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## ***FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT***

### ***HOLLYWOOD COMMUNITY PLAN AREA***

***This document together with the Draft EIR and its appendices comprise the Final EIR  
as required under the California Environmental Quality Act***

### ***Hollywood Community Plan Update***

***ENV-2005-2158-EIR***

***CPC no. 97-0043***

***State Clearinghouse No. 2002041009***

***Council Districts 4, 5 and 13***

***Project Location:*** The Hollywood Community Plan covers 25 square miles, extending roughly south of the Cities of Burbank and Glendale and the Ventura Freeway, west of the Golden State Freeway, north of Melrose Avenue and south of Mulholland Drive and east of the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

***Project Description:*** The Proposed Hollywood Community Plan (Proposed Plan) includes changes in land use designations and zones that are intended to accommodate growth anticipated in the SCAG 2030 Forecast and allow for additional development. Hollywood is a prime location for transit-oriented development. The investment in transit infrastructure in Hollywood provides an opportunity for integrating transportation planning with land use planning. The recommended pattern of land use directs future growth to areas of Hollywood where new development can be supported by transportation infrastructure and different types of land uses can be intermingled to reduce the length and number of vehicle trips. Mixed-use development around Metro stations and transit corridors would give residents and visitors mobility choices that would enable reduction in the number and length of vehicle trips thus reducing greenhouse gas emissions associated with travel behavior, in accordance with recent legislation (SB 375). As part of redirecting growth, the Proposed Plan includes removing and/or revising development limitations on commercial zones and multi-family residential zones that were imposed during the previous Update in 1988. The Proposed Plan also contains policies and programs to protect the character of low-scale residential neighborhoods and the rich built history of key buildings and places that are considered historically and culturally significant. Modified street standards are proposed to align standards with existing conditions and use of streets, as well as accommodate features of streets that are identified as Historic-Cultural Monuments, such as the Hollywood Walk of Fame. Proposed land use changes would be implemented by Plan amendments, zone changes, and height district changes and other long-range implementation programs.

### **PREPARED BY:**

Los Angeles City Planning Department  
October 2011

**HOLLYWOOD COMMUNITY PLAN UPDATE  
FINAL ENVIRONMENTAL IMPACT REPORT**

**RESPONSE TO COMMENTS**

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## **1.0 INTRODUCTION**

### **Purpose**

This document is the Final Environmental Impact Report for the Hollywood Community Plan Update. This document together with the Draft EIR and its technical appendices comprise the Final EIR. The document has been prepared by the City of Los Angeles Planning Department pursuant to the California Environmental Quality Act (“CEQA”) Guidelines Section 15088 et seq.

The Final EIR is required under Section 15132 of the CEQA Guidelines to include the Draft EIR or a revised version; comments and recommendations received on the Draft EIR either verbatim or in summary; a list of persons, organizations, and public agencies who commented on the Draft EIR; the responses of the Lead Agency to significant environmental issues raised by those comments in the review and consultation process; and any other relevant information added by the Lead Agency (including minor changes to the EIR); the Mitigation Monitoring and Reporting Program is a separate document that accompanies the Final EIR.

The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

### **Process**

As defined by Section 15050 of the CEQA Guidelines, City of Los Angeles Planning Department is the Lead Agency, preparing both the Draft and Final EIR for this project. A Notice of Preparation (NOP) was prepared and circulated April 28, 2005, through May 31, 2005 for the required 30-day review period.

The Draft EIR was prepared and circulated for a period of 90 days (in excess of the 45-day public review period required by State law), beginning on March 3, 2011, and ending on June 1, 2011. Comments on the Draft EIR were received during the comment period, and those comments are set forth and are responded to in this Final EIR.

This Hollywood Community Plan together with this Final EIR will be submitted to the Planning Commission and City Council for requested certification of the Final EIR and action on the Plan. The City Planning Commission and City Council will review the Final EIR, together with the proposed Hollywood Community Plan Update and will decide whether to certify the Final EIR and approve the Plan Update.

**Contents of the Final EIR**

As discussed above, the primary intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City of Los Angeles Planning Department has reviewed and addressed all comments received on the Draft EIR prepared for the Hollywood Community Plan Update. Included within the Final EIR are written comments that were submitted during the required public review period.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR has been prepared in four parts. A description of each part plus the separate Mitigation Monitoring and Reporting Plan is as follows:

- Chapter 1 provides a brief introduction to the Final EIR and its contents.
- Chapter 2 provides a list of commenting agencies, organizations and individuals as well as copies of each comment letter received.
- Chapter 3 provides responses to written comments made by both the public agencies and interested parties. Some of the comment letters received on the Draft EIR also provide comments on the Proposed Plan (not the anticipated environmental impacts). These Plan-related comments require no response in the EIR process, but the opinions expressed by the commenter will be forwarded to the Planning Commission and City Council for their consideration in the project decision-making process.
- Chapter 4 provides a list of corrections and additions to the Draft EIR. None of the changes significantly impact the conclusions presented in the Draft EIR.
- The Mitigation Monitoring and Reporting Program (“MMRP”) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the CEQA Guidelines is prepared as a separate document to accompany the Final EIR.
- Appendices to the Final EIR include attachments to comment letters and a proposed Land Use map. These appendices are included on a CD included in a sleeve inside the back cover.

**Review and Certification of the Final EIR**

Consistent with State law (Public Resources Code 21092.5), responses to agency comments are being forwarded to each commenting agency more than 10 days prior to the public hearing. In addition, at the same time responses are being distributed to all commenters who provided an address.

The Final EIR is available for public review at the following locations:

Srimal Hewawitharana  
City of Los Angeles  
Department of City Planning  
200 Spring Street, Room 750  
Los Angeles, CA 90012  
Telephone: (213) 978-1359  
E-Mail: [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)

Central Library  
630 W. 5th Street,  
Los Angeles, CA 90071

Frances Howard Goldwyn-Hollywood Regional Branch Library  
1623 N. Ivar Avenue  
Hollywood, CA 90028

Cahuenga Branch Library  
4591 Santa Monica Boulevard  
Los Angeles, CA 90029

John C. Fremont Branch Library  
6121 Melrose Avenue  
Los Angeles, CA 90038

Los Feliz Branch Library  
1847 Hillhurst Avenue  
Los Angeles, CA 90027

Will & Ariel Durant Branch Library  
7140 W. Sunset Boulevard  
Los Angeles, CA 90046

Additionally, the Final EIR can be downloaded or reviewed via the Internet at the Department of City Planning's website [<http://planning.lacity.org/> -- click on "What's New?" and then "Final Environmental Impact Report" or click on "Environmental" and then "Final EIR"]. The Final EIR can be purchased on cd-rom for \$7.50 per copy. Contact Srimal Hewawitharana of the City of Los Angeles at [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org) to purchase one.

## 2.0 LIST OF COMMENTERS AND COMMENTS

### List of Commenting Agencies, Organizations and Individuals

The public comment period for the Draft EIR extended from March 3, 2011 to May 2, 2011. The table below lists all the letters received on the Draft SEIR.

<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
<b>1</b>	<b>State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit</b>	<b>Scott Morgan, Director</b>	<b>June 2, 2011</b>	<b>3-11</b>
<b>2</b>	<b>South Coast Air Quality Management District</b>	<b>Ian MacMillan, Program Supervisor</b>	<b>June 1, 2011</b>	<b>3-11</b>
<b>3</b>	<b>City of Los Angeles Council District 5</b>	<b>Councilmember Paul Koretz</b>	<b>May 31, 2011</b>	<b>3-11</b>
<b>4</b>	<b>Department of Public Works Bureau of Sanitation</b>	<b>Ali Poosti, Acting Division Manager Wastewater Engineering Services Division</b>	<b>May 31, 2011</b>	<b>3-12</b>
<b>5</b>	<b>Central Hollywood Neighborhood Council</b>	<b>Scott Campbell, President</b>	<b>May 27, 2011</b>	<b>3-13</b>
<b>6</b>	<b>East Hollywood Neighborhood Council Planning and Entitlement Review Committee</b>	<b>Armen Makasijian, District 5 Representative Member Planning and Entitlement Review Committee</b>	<b>May 31, 2011</b>	<b>3-20</b>
<b>7</b>	<b>East Hollywood Neighborhood Council</b>	<b>Eric J. Moore, Vice President Public Safety Committee Co-Chair</b> <b>&amp;</b> <b>Craig E. Cox, Vice President Public Safety Committee Co-Chair</b>	<b>May 31, 2011</b>	<b>3-21</b>
<b>8</b>	<b>Greater Griffith Park Neighborhood Council</b>	<b>Ron Ostrow, President, GGPNC Board</b> <b>&amp;</b>	<b>May 17, 2011</b>	<b>3-22</b>

<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
		<b>Gary Khanjian Chairman, Planning, Zoning, Historic Preservation Committee</b>		
<b>9</b>	<b>Hollywood Hills West Neighborhood Council</b>	<b>Anastasia Mann, President</b>	<b>June 1, 2011</b>	<b>3-27</b>
<b>10</b>	<b>Hollywood Hills West Neighborhood Council</b>	<b>Rev. Robin Moren, BSW Area 3 Chair, HHWNC Program Director, Project Saving Grace</b>	<b>Undated, emailed May 31, 2011</b>	<b>3-34</b>
<b>11</b>	<b>Hollywood United Neighborhood Council</b>	<b>Susan Swan, President &amp; David H. Schlesinger, PLUM Committee</b>	<b>May 23, 2011</b>	<b>3-35</b>
<b>12</b>	<b>MidCity West Community Council</b>	<b>Jeff Jacobberger, MCWCC Chair &amp; Charles Lindenblatt, MCWCC PLUC HCP-DEIR Working Group Chair</b>	<b>May 20, 2011</b>	<b>3-36</b>
<b>13</b>	<b>Sunland-Tujunga Neighborhood Council</b>	<b>Cindy Cleghorn, Secretary, Sunland-Tujunga NC/Land Use Committee Member</b>	<b>June 1, 2011</b>	<b>3-38</b>
<b>14</b>	<b>Cahuenga Pass Property Owners' Association</b>	<b>Bryce C. Lowery, President</b>	<b>June 1, 2011</b>	<b>3-38</b>
<b>15</b>	<b>Fix the City</b>	<b>James O'Sullivan</b>	<b>June 1, 2011</b>	<b>3-39</b>
<b>16</b>	<b>Franklin/Hollywood Blvd. West Homeowners' Association</b>	<b>Branden Chapman &amp; Don Andres, President</b>	<b>May 26, 2011</b>	<b>3-44</b>
<b>17</b>	<b>Friends of Griffith Park</b>	<b>Gerry Hans, President</b>	<b>May 31, 2011</b>	<b>3-44</b>
<b>18</b>	<b>Hollywood Chamber of Commerce</b>	<b>Leron Gubler, President and CEO</b>	<b>May 31, 2011</b>	<b>3-46</b>
<b>19</b>	<b>Brown/ Meshul Inc, representing Hollywood</b>	<b>Mark Brown, President</b>	<b>June 1, 2011</b>	<b>3-48</b>

<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
	<b>Community Housing Corporation</b>			
<b>20</b>	<b>Hollywood Heritage, Inc</b>	<b>Richard Adkins, President</b>	<b>May 5, 2011</b>	<b>3-48</b>
<b>21</b>	<b>Hollywood Knolls Community Club</b>	<b>Daniel Savage, President</b>	<b>June 1, 2011</b>	<b>3-52</b>
<b>22</b>	<b>Los Angeles Conservancy</b>	<b>Adrian Scott Fine, Director of Advocacy</b>	<b>June 1, 2011</b>	<b>3-53</b>
<b>23</b>	<b>La Brea Willoughby Coalition</b>	<b>Lucille Saunders, President</b>	<b>June 1, 2011</b>	<b>3-54</b>
<b>24</b>	<b>The Silverstein Law Firm, representing the La Mirada Avenue Neighborhood Association</b>	<b>Bradly S. Torgan, AICP</b>	<b>June 1, 2011</b>	<b>3-60</b>
<b>25</b>	<b>La Mirada Avenue</b>	<b>Suriya Prasad</b>	<b>June 1, 2011</b>	<b>3-63</b>
<b>26</b>	<b>La Mirada Neighborhood Association</b>	<b>Arthur Kassan, registered Traffic Engineer and registered Civil Engineer</b>	<b>May 31, 2011</b>	<b>3-63</b>
<b>27</b>	<b>Loyola Marymount University Environmental Action Team</b>	<b>Greer Gosnell Briana Berstrom Andrea Daly Darryl Yip Kimberly Tomicich Brian Treanor, Ph.D.</b>	<b>April 30, 2011</b>	<b>3-64</b>
<b>28</b>	<b>Mullholland Scenic Design Review Board</b>	<b>Alan Kishbaugh, Chair</b>	<b>June 1, 2011</b>	<b>3-64</b>
<b>29</b>	<b>Outpost Estates Homeowners Association</b>	<b>Marla Strick, Secretary</b>	<b>June 1, 2011</b>	<b>3-64</b>
<b>30</b>	<b>Alpha Design</b>	<b>Pablo &amp; Jackie Ruiz Hollywood Studio District Neighborhood Council PLUM Committee members</b>	<b>June 1, 2011</b>	<b>3-65</b>



<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
31	Craig Lawson & Co., LLC	Craig Lawson President	May 31, 2011	3-67
32	Forest Lawn Memorial-Parks & Mortuaries	Darin B. Drabing President and Chief Executive Officer	June 1, 2011	3-67
33	LT Properties	Vytas Juskys	May 31, 2011	3-67
34	NBCUniversal	Tom Smith SVP, West Coast Real Estate	June 1, 2011	3-68
35	Paramount Contractors & Developers, Inc.	Brian Folb	March 7, 2011	3-68
36	Jeffer Mangels Butler & Mitchell LLP, Quite Lion 1, L.P.	Kevin K. McDonnell	May 27, 2011	3-68
37	Sheppard, Mullin, Richter & Hampton LLP, representing Sunset Studio Holdings, LLC	James E. Pugh	May 26, 2011	3-69
38	Siren Studios	Dean Gavoni (? Signature illegible) CEO/President Siren Productions LLC	May 26, 2011	3-69
39	Resident of Outpost Drive	Craig Albert	May 27, 2011	3-69
40	Resident of Outpost Drive	Bob Barker	May 27, 2011	3-70
41	Resident of Outpost Drive	Kenneth W.E. Berry	May 31, 2011	3-70
42		Robert Blue	June 1, 2011	3-70
43		Elaine Brown	June 1, 2011	3-71
44	Resident, Outpost Drive	Shell & Craig Cardon	May 27, 2011	3-71
45		Joyce Dillard	June 1, 2011	3-71
46		Brian Dyer	May 31, 2011	3-73

<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
47	Resident, Outpost Drive	Robert Eicholz	May 31, 2011	3-74
48		Orrin Feldman (Vice president of HHWNC, writing as an individual)	June 1, 2011	3-74
49		Terry L. Hake Church	June 1, 2011	3-78
50	Resident, Outpost Drive	Don G. Howard	May 27, 2011	3-79
51		Edward Villareal Hunt Chair, HSDNC PLUM/Housing/Parks Committee (personal comments)	June 1, 2011	3-79
52	McQuiston Associates	J.H. McQuiston, P.E.	May 26, 2011	3-80
53	Resident, Outpost Drive	Debra Nodelman	May 27, 2011	3-89
54	Resident, Outpost Drive	Caroline Pintoff	May 27, 2011	3-89
55	Resident, Outpost Drive	Lynne Pirtle	May 27, 2011	3-89
56		Richard H. Platkin	June 1, 2011	3-89
57		Jay Pirincci	May 31, 2011	3-89
58		Richard Spicer Member, GGPNC's PZHP Committee	May 31, 2011	3-89
59	Resident, Outpost Drive	Claire Torlel (?)	May 27, 2011	3-90
60	Resident, Outpost Drive	Barbara Turner	May 27, 2011	3-90
61	Resident, Outpost Drive	Nicholas S. West	May 27, 2011	3-90
62	V.O.i.C.E., STNC Land Use Committee, SaveTheGolfCourse.Org	Karen Zimmerman Member, Sunland-Tujunga Neighborhood Council Land Use Committee	June 1, 2011	3-90

<b>Letter.</b>	<b>Organization</b>	<b>Commenter Name</b>	<b>Comment Date</b>	<b>Response Page Number</b>
<b>63</b>		<b>Gordon Hessler</b>	<b>May 27, 2011</b>	<b>3-90</b>
<b>64</b>		<b>Carol Sidlow</b>	<b>May 31, 2011</b>	<b>3-90</b>
<b>65</b>		<b>Nadia Connors</b>	<b>May 25, 2011</b>	<b>3-91</b>
<b>66</b>	<b>Land Use Coalition of Public Counsel's Early Care and Education Law Project</b>	<b>Allen W. Hubsch</b>	<b>May 16, 2011</b>	<b>3-91</b>
<b>67</b>	<b>East Hollywood Neighborhood Council</b>	<b>David Bell, President &amp; Doug Haines, Chair, Planning Entitlement Review Committee</b>	<b>May 31, 2011</b>	<b>3-91</b>
<b>68</b>	<b>Residents of Harold Way &amp; Serrano Ave</b>	<b>[Q] Condition Petition</b>	<b>Received June 1, 2011</b>	<b>3-91</b>



STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT

JERRY BROWN  
GOVERNOR

June 2, 2011

Srimal P. Hewawitharana  
Los Angeles City Planning Department  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JUN 09 2011

ENVIRONMENTAL

Subject: Hollywood Community Plan Update  
SCH#: 2002041009

Dear Srimal P. Hewawitharana:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 1, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

1-1

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2002041009  
**Project Title** Hollywood Community Plan Update  
**Lead Agency** Los Angeles, City of

**Type** EIR Draft EIR  
**Description** Note: Extended Per Lead

The Proposed Hollywood Community Plan (Proposed Plan) includes changes in land use designations and zones that are intended to accommodate growth anticipated in the SCAG 2030 Forecast and allow for the additional development.

**Lead Agency Contact**

**Name** Srimal P. Hewawitharana  
**Agency** Los Angeles City Planning Department  
**Phone** (213) 978-1359 **Fax**  
**email**  
**Address** 200 N. Spring Street, Room 750  
**City** Los Angeles **State** CA **Zip** 90012

**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long** 34° 05' 54" N / 118° 19' 33" W  
**Cross Streets** Hollywood Community Planning Area  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** Hwy 101, I-5  
**Airports** No  
**Railways** No  
**Waterways** No  
**Schools** Several  
**Land Use** Various

**Project Issues** Air Quality; Archaeologic-Historic; Economics/Jobs; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; CA Department of Public Health; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 03/04/2011 **Start of Review** 03/04/2011 **End of Review** 06/01/2011



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-Mailed: June 1, 2011  
Srimal.Hewawitharana@lacity.org

June 1, 2011

Ms. Srimal Hewawitharana  
Room 750, City Hall  
Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Hollywood Community Plan Update Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (final EIR) as appropriate.

2-1

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant operational air quality impacts given that the project could place new sensitive land uses<sup>1</sup> and intensify existing sensitive land uses within 500 feet of the 101 Freeway. The 101 Freeway is a potentially significant source of toxic air pollutants due to the approximate 221,000 vehicles per day that travel along this section. Therefore, consistent with the CARB Land Use Handbook<sup>2</sup> the lead agency should include mitigation in the final EIR that precludes the placement of new sensitive land uses or the intensification of existing sensitive land uses within 500 feet of the 101 Freeway. If the lead agency determines that a mitigation measure requiring a 500 foot buffer between the 101 Freeway and sensitive land uses is infeasible then the potential health risk impacts to these receptors should be quantified. In the event that the final EIR demonstrates significant adverse air quality impacts the lead agency should require

2-2

<sup>1</sup> Sensitive land uses are land uses where sensitive individuals are most likely to spend time, including schools, schoolyards, parks, playgrounds, day care centers, nursing homes, hospitals, and residential communities.

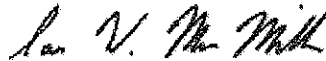
<sup>2</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

mitigation pursuant to Section 15092 of the California Environmental Quality Act (CEQA) Guidelines. Further, AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines additional mitigation measures are considered to minimize the project's significant construction-related air quality impacts. Details regarding these comments are attached to this letter.

2-2  
cont.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC110308-06  
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion regarding toxic air contaminants (Section 4.6) in the draft EIR the proposed project includes sensitive land uses within 500 feet of the 101 Freeway. As a result, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic that would travel in close proximity to these land uses.

2-3

The lead agency relies on the use of air filters with a minimum efficiency reporting value (MERV) of 13 placed in residential HVAC systems combined with other measures (e.g., inoperable windows facing the freeway) to mitigate the project's health risk impacts from the 101 Freeway below the significance level. While these measures can be effective against particulate pollution they do not have the ability to remove a wide variety of gaseous pollutants (i.e., NOx, TAC's and VOC's) associated with traffic-related pollution. These measures also have no effectiveness on outdoor activities associated with residential uses and filters can require long term and potentially costly maintenance. Lastly, without quantifying the level of potential air quality impacts from the freeway, nor the effectiveness of the proposed mitigation measures, the lead agency has not demonstrated that this impact is less than significant. Therefore, AQMD staff recommends that the lead agency maintain the 500-foot buffer specified in the CARB Land Use Handbook for any new residential project built close to a freeway.

2-4

2-5

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant construction-related air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines Section 15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by revising mitigation measure one (1) on page 4.6-26 and 4.6-27 of the draft EIR as follows:

2-6

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,



- Construct or build with materials that do not require painting,
- Require the use of pre-painted construction materials,
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
- Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications,
- Prohibit truck idling in excess of five minutes,
- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
  - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

2-6  
cont.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

2-6  
cont.

Committees:

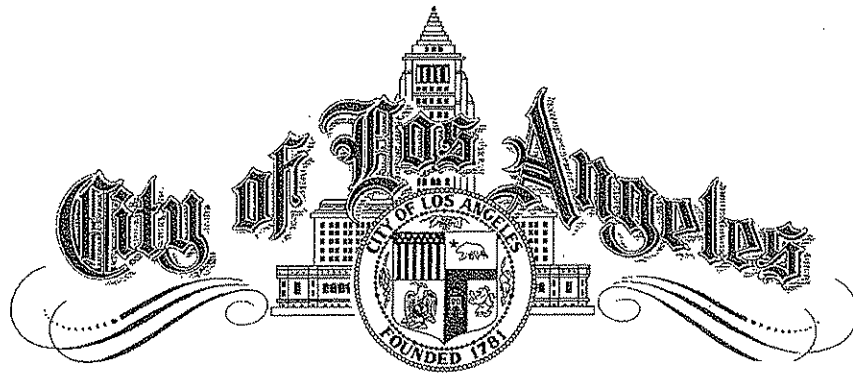
Chair  
Audits & Governmental  
Efficiency

Vice Chair  
Personnel

Member  
Budget & Finance  
Energy & Environment  
Transportation

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**PAUL KORETZ**  
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May 31, 2011

Director Michael LoGrande  
Department of City Planning  
200 North Spring Street, 5<sup>th</sup> Floor  
Los Angeles, CA 90012

Re: Hollywood Community Plan Update – EIR Comments

Director LoGrande:

I am extremely pleased to see the Hollywood Community Plan Update near completion. Prepared over the course of years, this plan reflects input from thousands of stakeholders and employs the most progressive and neighborhood-friendly planning principles available. Significant within this plan is the concentration of growth within transit-served major boulevards with preservation and retention of existing single-family neighborhoods as well as no increase in density in hillside communities.

3-1

There are still some outstanding concerns nevertheless regarding the plan and I ask that the final EIR will address the following:

Change areas SA 38 and 38A lie along La Cienega Boulevard within the La Cienega Design Quarter (LCDQ). This area is a collection of design services, furnishing and other high-end boutiques with businesses within both Los Angeles and West Hollywood. This contiguous business district is walkable and its agglomeration of design shops in close proximity is its strength. The final plan should provide for the protection and enhancement of this unique commercial district. La Cienega Design Quarter could be enhanced by requiring a ground-floor commercial component in all new development, requiring pedestrian oriented design and as part of the implementation program for the plan-update supporting a business improvement district or other entity to tie the LCDQ together.

3-2

While the development of the southwest corner of La Brea and Willoughby is already entitled and restrained by litigation regarding that development, the proposed zone-change referenced as 39:4 seems to allow additional residential development instead of the stated purpose to "provide

3-3



an incentive for maintaining targeted media related industrial uses.” The zone change to CM-2D will allow the construction of dense multifamily housing within precious industrial land. There are three potential negative consequences: purely residential buildings do not improve pedestrian activity on the street, loss of space for postproduction and other media businesses will be devastating for the Los Angeles economy, and new residents of such development may create a conflict with adjacent industrial users creating further pressure to move those industrial users out of Los Angeles.

3-3  
cont.

My office has worked extensively to retain filming and the media business in Los Angeles. This effort involves promoting filming, easing conflicts between residents and film crews, tax reform and incentives but also must include retention of the very land where the industry operates from. A zone change on these parcels to M1-2D would still give greater flexibility than today’s zoning allowing parcels to operate on both sides of the blurry line between commercial and industrial but still designate this area as inappropriate for housing. In this alternative the resulting land-use would also be more compatible with SA 40 which is adjacent and proposed as prohibiting residential units. The final EIR should evaluate this alternative and while the EIR is not, in and of itself, an economic document, I do expect the Planning Department to provide decision-makers such as myself with the relevant forecasts, job-creation potential and consequences of these land-use changes, particularly to the film industry in Los Angeles

3-4

On the transportation front, the proposed modified street standards are to be applauded. Particularly on La Brea Avenue there is simply no productive reason to widen a street, narrow the sidewalk and achieve no additional traffic lanes. This hopefully will replace the current practice of requesting modifications through the tract map process on new discretionary project and individual council-motions to adjust by-right developments.

3-5

Martel Avenue north of Melrose should be re-evaluated for its street width and standard. This stretch of Martel functionally serves as a local street and it should be so designated. Furthermore, the section of Martel that continues into the City of West Hollywood does not function as a major street but rather as a local. The current street designation prevents the city from installing speed tables and other traffic-calming measures. We ask that this stretch of Martel be downgraded to a local street to facilitate the installation of these improvements which are necessary to protect the residents and pedestrians along Martel.

3-6

The final EIR must also provide additional details and implementation measures to maintain and improve the infrastructure in Hollywood. While the honesty in stating that impacts to parks, water and transportation are significant and unavoidable even after mitigation is laudable, we all need to be challenged to do more to upgrade our City’s infrastructure. The question for the planning process should not simply be can the infrastructure handle growth but rather how can we assure that new development fully mitigates and in fact contributes to the City’s infrastructure.

3-7

Precedents for impact fees and programs to address infrastructure already exist within the family. The West Los Angeles and the Coastal Corridor Transportation Impact Specific Plans both address the incremental costs of development on the transportation system. Closer to downtown the Central City West Specific Plan covers a number of infrastructure issues, and within the

3-8

valley the Warner Center Specific Plan covers transportation in yet another fashion. New development does not only impact our streets but also our sewer pipes, our water mains, our police and fire stations, parks, libraries, schools and other public resources. Regardless of the exact tool, the plan should identify an implementation mechanism by which development is charged for the full incremental impact on all City infrastructure.

3-8  
cont.

I look forward to reviewing a final document that addresses all of these issues.

Thank you,

A handwritten signature in black ink, appearing to read "Paul Koretz". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end of the name.

PAUL KORETZ

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: May 31, 2011

TO: Srimal Hewawitharana, Environmental Specialist II  
Department of City PlanningFROM: Ali Poosti, Acting Division Manager  
Wastewater Engineering Services Division  
Bureau of SanitationSUBJECT: **Hollywood Community Plan Update – Draft EIR**

This memo is in response to your April 14, 2011 letter requesting wastewater service information for the proposed project area. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the existing sewer structural condition and capacity within the vicinity of your proposed project location.

The City of Los Angeles sewer system consists of primary sewers (16-inches and larger in diameter) and secondary sewers (less than 16-inches in diameter). The secondary sewers service the property laterals and feed into the primary sewer lines. The primary sewers in turn discharge to the trunk, interceptor, and outfall pipes. The wastewater is ultimately conveyed to the Hyperion Treatment Plant which has sufficient capacity for current and future development.

4-1

Your project description lacks sufficient detail for us to conduct a thorough capacity analysis. However, we have enclosed as much information as possible in the form of our latest Primary Sewer Basin Master Plans, some sewer gauging data for the secondary sewers and a list of current and/or future wastewater Capital Improvement Projects (CIPs) within your project area.

4-2

**PRIMARY SEWERS**

Based on the project description, the Hollywood Community Plan Update is located within or intersects the Griffith Park, Hollywood, North Hollywood-Sunland, and Northeast Wilshire Primary Sewer Master Planning Basins. In the attachment CD, a copy of each basin report has been provided for your reference. The reports include current conditions, sewer flow capacity projections to the year 2050, and available gauging information. The Master Plans discusses the projected hydraulic capacity conditions and needs of the basins in detail. The hydraulic capacity assessments are based upon modeling which makes use of flow gauging together with projected estimates of future wastewater generation. The condition assessments are based on closed circuit television (CCTV) inspection data and are not projected to the future.

4-3

CCTV inspection ultimately results in a rank or grade that reflects the structural condition and determines the course of action to follow. The structural condition ranks are described in Table 1.

Table 1: Structural Condition Ranks		
Ranking	Description	Action
A	Pipe is in very good condition.	No action required.
B	Pipe is in good condition.	No action required.

<b>Table 1: Structural Condition Ranks</b>		
<b>Ranking</b>	<b>Description</b>	<b>Action</b>
C	Pipe is in fair condition.	Lower priority for rehabilitation project. Conduct another CCTV inspection in five years.
D	Pipe is in poor condition.	Schedule for rehabilitation.
E	Pipe requires emergency repair or replacement.	Issue emergency contract for repair/replacement.

4-3  
cont.

Based on the structural conditions, most of the primary sewer lines in the Hollywood Community Plan Update are in good to very good condition, although there is one on-going rehabilitation project currently planned in the Griffith Park Basin. Our hydraulic capacity modeling analysis indicates no additional hydraulic relief projects are needed at this time.

## SECONDARY SEWERS

Based on existing gauging information, the secondary sewers within the proposed project location do not exhibit capacity deficiencies for current and future development. The current approximate flow level (d/D) in the secondary sewer basins are shown in Figure 1 and Table 2.

4-4

<b>Table 2: Existing Gauging Data</b>			
<b>MH #</b>	<b>Pipe Location</b>	<b>Current Gauging d/D (%)</b>	<b>Gauged Date</b>
468-10-047	Rowena Ave	0.31	2010
469-13-003	Highland Ave	0	2007
469-13-017	Ivar Ave	0.14	2008
469-13-061	Las Palmas Ave	0.33	2007
469-13-081	Las Palmas Ave	0.3	2007
469-13-111	Highland Ave	0.07	2007
469-13-196	De Longpre Ave	0.23	2005
469-14-018	Vista del mar Ave	0.16	2007
469-14-035	Vine St	0.48	2007
469-14-042	Argyle Ave	0.3	2010
469-14-069	Selma Ave	0	2008
469-14-084	Argyle Ave	0.23	2007
469-14-107	Sunset Blvd	0.5	2010
469-14-118	Gower St	0.3	2007
469-14-122	Sunset Blvd	0.24	2008
469-15-051	Normandie Ave	0.72	2008
469-15-102	Western Ave	0.12	2008
469-16-076	Sunset Blvd	0.63	2008
492-04-019	Orange Dr	0.48	2010
492-04-033	Orange Dr	0.09	2007
492-04-041	Santa Monica Blvd	0.18	2006
492-04-051	Orange Dr	0.14	2006
492-04-066	Romaine St	0.5	2007
492-04-073	Poinsettia pl	0.23	2008
492-04-074	Formosa Ave	0.21	2008

<b>Table 2: Existing Gauging Data</b>			
<b>MH #</b>	<b>Pipe Location</b>	<b>Current Gauging d/D (%)</b>	<b>Gauged Date</b>
492-06-003	Croft Ave	0.19	2007
492-06-112	Harper Ave	0.47	2007
492-06-125	Melrose pl	0.33	2007
492-07-109	Fairfax Ave	0.28	2009
492-08-042	La Brea Ave	0.25	2008
492-08-056	Sycamore Ave alley	0.45	2007
493-01-008	Fountain Ave	0.19	2010
493-01-034	Las Palmas Ave	0.16	2007
493-01-068	Cole Ave	0.11	2010
493-01-084	Seward St	0.21	2010
493-01-104	Santa Monica Blvd	0.39	2006
493-01-237	Seward St	0.32	2006
493-02-022	Gower St	0.23	2007
493-02-068	Vine St	0.22	2008
493-03-027	Normandie Ave	0.37	2009
493-05-025	Seward St	0.15	2009
493-05-030	Cahuenga Blvd	0.11	2008
493-05-032	Lillian Wy	0.09	2010
493-05-068	Melrose Ave	0.12	2010
493-07-014	Lemon grove Ave	0.37	2008
494-01-178	Lockwood Ave	0.52	2010

4-4  
cont.

**Structural Condition**

Our latest CCTV inspection results indicate most of the secondary sewers in the project area are in fairly good condition. Figure 2 shows the current conditions of the sewers within the project study area. A few of the Secondary Sewer Plan Reports within the area is currently pending and will be completed in the near future. Based on the preliminary results, the reports recommend 59 future sewer point repair projects, 314 sewer renewal projects, and 1054 sewer replacement projects on the existing sewers within Hollywood Community Plan Update and is shown in Figure 3 and listed in Table 3. Please note that these results may change upon finalizing the planning report.

4-5

**SUMMARY**

A more detailed review of your project, or individual elements of your project, will be required as your project progresses and sufficient details are developed. At that time you will need to submit a Sewer Capacity Availability Request (SCAR) and will need to provide detailed project information showing the exact building location, type, use, and occupancy along with the projected wastewater flow rates and the proposed sewer connection. If the public sewer has insufficient capacity for any proposed building project then the developer will be required to build public sewers to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time.

4-6

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.



Encl: Figure 1 – Hollywood Community Plan Update Sewer Map  
Figure 2 – Hollywood Community Plan Update Secondary Condition Assessment Ranks Map  
Figure 3 – Hollywood Community Plan Update Secondary Condition Assessment Recommendation Map  
Table 3 – Hollywood Community Plan Update Recommended Projects  
CD – Primary Sewer Master Plans that intersect the Hollywood Community Plan Update Area

cc: Kosta Kaporis, BOS  
Daniel Hackney, BOS  
Rowena Lau, BOS



May 27, 2011

Srimal Hewawitharana  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012  
Email address: Srimial.hewawitharana@lacity.org

RE: Hollywood Community Plan Update  
Draft Environmental Impact Report

Dear Srimal Hewaswitharana,

As the first certified Neighborhood Council in Hollywood, Central Hollywood Neighborhood Council wishes to provide comment on the H-CPU DEIR. We thank the Planning Department for providing additional time in which to review this document.

We appreciate the great potential of the Hollywood Community Plan Update. However the DEIR fails to provide essential mitigations for the severity of the impacts described. CHNC requests that all mitigations not only be feasible but also enforceable. This would be accomplished through the adoption of a Community Plan Implementation Ordinance whose purpose is to provide for supplemental development regulations tailored to each Community Plan area, ensuring that development enhances the unique architectural, environmental, and cultural qualities of each Community Plan area, integrates improvements and enhancements to the public right-of-way, and maintains compatible land uses, scale, intensity, and density and to create an approval process to enable infill development that will positively impact communities.

5-1  
5-2

The following identifies DEIR deficiencies or inadequacies and describes why proposed mitigations do not appear to be sufficient or appropriate. Our recommendations are also included.

**Land Use**

*Assessment:*

**Open Space**

The Community Plan must not conflict with Elements of the General Plan including the Framework Element. Chapter 6 of the Framework Element, Open Space and Conservation, includes the goal to have, “an integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.” Further, Object 6.4, Community Stability, seeks to, “ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass” and includes the policy (Policy 6.4.6) to, “explore ways to connect neighborhoods through open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.”

5-3

The Community Plan Update discusses, but does not set as a policy the creation of the Hollywood Central Park which would provide the establishment of open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.

*Further Analysis & Mitigation:*

The Community Plan must adopt Policy 6.4.6 of the General Plan Framework Element and include as its own policy the establishment of the Hollywood Central Park. Failing to do so would conflict with the General Plan Framework Element.

5-3  
cont.

*Assessment:*

**Subarea 40:1A (Southeast corner of Mansfield and Santa Monica)**

The Zone Change is not consistent with the General Plan Designation. [Q]M1 is not a corresponding zone within the Commercial Manufacturing Land Use Designation.

5-4

*Further Analysis & Mitigation:*

**Correction:** Existing Land Use Designation is Limited Manufacturing, not Commercial Manufacturing. If Commercial Manufacturing is the proposed General Plan Designation it needs to be reflected in Table 4.1-1 (Land Use Designations - Existing and Proposed Plans) as a change in the land use designation. If Commercial Manufacturing is not the proposed Land Use Designation, the subarea needs to be corrected to read Limited Industrial.

*Assessment*

**Subarea 40:2B (East side of Seward, north of Willoughby and south of industrial zone)**

The Zone Change is not consistent with the General Plan Designation. C4 is not a corresponding zone within the Commercial Manufacturing Land Use Designation. Commercial Manufacturing is not consistent with surrounding Land Use Designations, which are Limited Industrial.

5-5

*Further Analysis & Mitigation:*

**Correction:** Existing land use is industrial, not commercial.

*Assessment*

**Subarea 40:2E (Southwest corner of Romaine and Hudson)**

The Zone Change should be consistent with CPC-2009-3158-GPA-ZC-SPR in preserving height limits along Hudson Avenue and include all three parcels along Hudson Avenue.

5-6

*Further Analysis & Mitigation:*

**Correction:** Existing Land Use Designation is Limited Manufacturing, not Medium Commercial.

*Assessment*

**Subarea 40:3 (Both sides of Steward between Melrose and Waring)**

The matrix shows corresponding zones which are not consistent with the Commercial Manufacturing Land Use Designation.

5-7

*Further Analysis & Mitigation:*

**Correction:** The correct zones should be CM, CMX, and P.

*Assessment*

**Subarea 40:5 (Generally the east side of Vine betw. Eleanor and Melrose, incl. Block s. of Waring, e. of Lillian Way, n. of Melrose, w. of Vine & n. side of Willoughby betw. Lillian Way & Vine)**

*Further Analysis & Mitigation:*

The Zone Change should include all properties which front Vine Street and Lillian Way, with the exception of PF zoned properties. Otherwise Zone Change could be considered "spot zoning".

5-8

*Assessment*

**Subareas 17:3 (South of Lexington, east of McCadden, north of Santa Monica, west of Seward), 39:3 (Eastern half of block generally south of Romaine, east of Formosa, north of Willoughby, west of La Brea) and 39:4 (Both sides**

5-9

**of La Brea, generally between Romaine and Willoughby, extending west to include most of the eastern half of the block s. of Romaine, e. of Formosa, n. of Willoughby, w. of La Brea)**

Total existing buildable floor area is approximately 1,706,404 sq. ft. Proposed General Plan Amendment and Zone Change could result in loss of 908,682 sq. ft. of floor area.

5-9  
cont.

### **Public Services**

#### *Assessment:*

The environmental analysis clearly identifies Public Services which would be impacted to a level of significance as a result of the implementation of the Community Plan Update however it does not attempt to propose reasonable and tangible mitigation measures (not only implementation of Community Plan policies) to reduce project impacts.

5-10

Several resources sited are inconsistent. In some areas of this section, current Police stats are ignored in favor of outdated data.

5-11

Consideration of inadequacy for Open Space is further discussed above in the Land Use Section.

#### *Further analysis & mitigation:*

1. The City must conduct a nexus study to determine the impact of future development on Public Services in Hollywood, and develop community-wide mitigations funded by impact fees. This cannot be a policy of the Community Plan, but mandated. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and would include mitigation measures for all new development and a fee structure by which all new development would be required to pay its fair share of fees to mitigate all potential Public Services impacts.

5-12

### **Utilities**

#### *Assessment:*

- 1) Given the uncertainties in the water supply horizon and in capacities of local delivery systems, impacts to water are considered potentially significant. There is no mitigation measure offered beyond the promise to work with LADWP on future projects to ensure expansion, upgrade and/or improvement of the local water distribution system within the CPA.

5-13

#### *Further Analysis & Mitigation:*

- 2) I see three solutions: 1. A plan for drastic and severe water rationing and conservation with serious enforcement.
2. Limit growth (Alternative Plan #2).
3. Future projects pay fees into desalination plant construction fund.

5-14

The City must conduct a nexus study to determine the impact of future development on water consumption in Hollywood, and develop community-wide mitigations funded by impact fees. This cannot be a policy of the Community Plan, but mandated. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and would include mitigation measures for water resources, including construction of a desalination plant, and a fee structure by which all new development would be required to pay its fair share of fees to mitigate potential impacts.

5-15

### **Transportation/Circulation**

#### *Assessment:*

The environmental analysis clearly identifies specific street segments which would be impacted to a level of significance as a result of the implementation of the Community Plan Update however it does not attempt to propose reasonable and tangible mitigation measures (not only implementation of Community Plan policies) to reduce project impacts.

5-16

#### *Further Analysis & Mitigation:*

The EIR must acknowledge those street segments and propose reasonable and tangible mitigation measures (not only implementation of Community Plan policies) to reduce project impacts.

Furthermore, the City must conduct a nexus study to determine the impact of future development on traffic in Hollywood, and develop community-wide mitigations funded by impact fees. This cannot be a policy of the Community Plan, but mandated. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and would include mitigation measures for all impacted street segments and intersections

5-17

and a fee structure by which all new development would be required to pay its fair share of fees to mitigate potential traffic impacts.

5-17  
cont.

*Assessment:*

The Community Plan Update seeks to amend a portion of the Transportation Element of the General Plan, the Bike Plan, by to include a number of bike lanes, bike routes or bicycle boulevards to then be studied by the Bike Plan. As the Community Plan Update is a General Plan Amendment, and amendments to the Transportation Element would be General Plan Amendments, any amendment to the Transportation Element should be done as part of the General Plan Amendment process with the Community Plan Update.

5-18

*Further Analysis & Mitigation:*

Page 115 of the Bicycle Plan says, “as each Community Plan update is updated future bicycle lanes in that planning area will be analyzed with regard to potential environmental impacts.”

The Community is being updated and proposes specific bike lanes, bike routes or bicycle boulevards. In order to be consistent with the policy of the Transportation Element, and the Bike Plan, and the analysis of those bike lanes, bike routes or bicycle boulevards must be performed “with regard to potential environmental impacts”. Failing to do so would conflict with the General Plan.

In addition, the General Plan Amendment which will enact the Community Plan Update should include the proposed amendments to the Transportation Element and its Bike Plan.

5-19

**Air Quality**

*Assessment:*

1. The policies of the Plan do not require the City to meet any standards, and instead only speaks of private development. The City should seek to implement its own climate policy, ClimateLA.
2. The Plan intends to increase density adjacent to the 101 Freeway and other major thoroughfares, resulting in exposure of sensitive receptors to substantial pollutant concentrations.

5-20

5-21

*Further Analysis & Mitigation:*

1. The EIR must analysis the policies and strategies of ClimateLA and the City must fully implement those actions which are under the purview of the City and are related to the Hollywood CPA, by 2030.
2. The Plan should provide as a policy, the implementation of the Hollywood Cap Park, and the EIR should analysis the potential air quality impact of such a project.
3. The City must conduct a nexus study to determine the impact of future development on air quality in Hollywood, and develop community-wide mitigations funded by impact fees. This cannot be a policy of the Community Plan, but mandated. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and would include mitigation measures for all new development and a fee structure by which all new development would be required to pay its fair share of fees to mitigate potential air quality impacts.

5-22

5-23

5-24

**Noise**

*Assessment:*

A1) The Plan states that Construction Noise and Vibration impacts that would occur are uncertain at this time and impossible to predict and would have to be evaluated further under subsequent CEQA actions. This is inadequate. It is not reasonable to shift the responsibility and impacts from the known design of the Plan and land use developments in the Plan onto future projects and not take into account cumulative impacts from multiple projects

5-25

A2) . New mitigations need to be prepared for the all the planned added development happening at similar time. i.e., requiring staggering construction that is within a certain radius, only allowing a certain number of projects to proceed within the radius in a given amount of time.

5-26

B1) The Plan states that the implementation of Implementation Program P12 mitigation measures to achieve an interior noise level of 45dB would reduce potential noise impacts to a less than significant level. This is a faulty and inadequate mitigation measure in that it does not take into account “green” building standards and project designs that are also applied, voluntarily or required, to new projects, which often include building orientation to prevailing winds and open windows for passive cooling. The DEIR itself is recommending mitigation measures (on

5-27

pages 4.4-17 and 4.4-19 under Utilities, Electricity and Natural Gas) of project orientation and energy-efficient building designs which would include open windows, making interior noise levels of 45dB not possible.

5-27  
cont.

B2) Modern cutting edge, environmentally friendly building requirements and incentives need to be considered in how they fit with Implementation Program P12. The DEIR mitigation measures recommended under different sections need to be compatible.

5-28

C2) Future development needs to be scaled back to the point that the impact is no longer significant (Alternative Plan #2).

5-29

*Assessment:*

The DEIR acknowledges on page 4.7-15 that, "increased traffic in the Plan area would significantly increase noise levels at sensitive receptors along certain street segments."

5-30

Section 114.02 of the LAMC (Chapter 11, Noise Regulations, Motor Driven Vehicles) states that:

(a) It shall be unlawful for any person to unreasonably operate any motor driven vehicle upon any property within the City or to unreasonably accelerate the engine of any vehicle, or unreasonably sound, blow or operate the horn or other warning device of such vehicle in such manner:

1. As to disturb the peace, quiet and comfort of any neighborhood or of any reasonable person residing in such area
2. That such activity is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source;
3. As to create any noise which would cause the noise level on the premises of any occupied residential property, or if a condominium, apartment house or duplex, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

(b) This section shall not be applicable to any vehicle which is operated upon any public highway, street or right-of-way or to the operation of any off-highway vehicle to the extent it is regulated in the Vehicle Code.

Furthermore, Section 115.02 states that:

It shall be unlawful for any person, other than personnel of law enforcement or governmental agencies, or permittees duly authorized to use the same pursuant to Sec. 103.111 of this Code, to install, use, or operate within the City a loudspeaker or sound amplifying equipment in a fixed or movable position or mounted upon any sound truck for the purposes of giving instructions, directions, talks, addresses, lectures, or transmitting music to any persons or assemblages of persons in or upon any public street, alley, sidewalk, park or place, or other public property except when installed, used or operated in compliance with the following provisions:

(a) In all residential zones and within 500 feet thereof, no sound amplifying equipment shall be installed, operated or used for commercial purposes at any time.

(b) The operation or use of sound amplifying equipment for noncommercial purposes in all residential zones and within 500 feet thereof, except when used for regularly scheduled operative functions by any school or for the usual and customary purposes of any church, is prohibited between the hours of 4:30 p.m. and 9:00 a.m. of the following day.

(c) In all other zones, except such portions thereof as may be included within 500 feet of any residential zone, the operation or use of sound amplifying equipment for commercial purposes is prohibited between the hours of 9:00 p.m. and 8:00 a.m. of the following day.

(d) In all other zones, except such portions thereof as may be included within 500 feet of any residential zone, the operation or use of sound amplifying equipment for noncommercial purposes is prohibited between the hours of 10:00 p.m. and 7:00 a.m. of the following day.

(e) The only sounds permitted shall be either music, human speech, or both.

(f) Sound emanating from sound amplifying equipment shall be limited in volume, tone and intensity as follows:

1. The sound shall not be audible at a distance in excess of 200 feet from the sound equipment.

2. In no event shall the sound be loud and raucous or unreasonably jarring, disturbing, annoying or a nuisance to reasonable persons of normal sensitiveness within the area of audibility.

(g) Except as provided in (b) above, no sound amplifying equipment shall be operated upon any property adjacent to and within 200 feet of any hospital grounds or any school or church building while in use.

(h) The operation or use of any sound amplifying equipment installed, mounted, attached or carried in or by any sound truck is further prohibited:

1. Within the Central Traffic district at any time;
2. **Upon Hollywood Boulevard between Vermont Avenue and La Brea at any time;**
3. Upon Wilshire Boulevard at any time;
4. **Upon Sunset Boulevard at any time;**
5. **Upon Vine Street at any time;**
6. Upon any street between the hours of 4:30 p.m. and 9:00 a.m. of the following day;
7. Upon any street on any Sunday.

*Further analysis & mitigation:*

Therefore, consistent with the analysis done by the DEIR (and in consideration of the traffic analysis which shows increased traffic and diminished Level of Service at various street segments), and the LAMC in regards to noise regulations the following mitigation measures should be included:

1. The appropriate City agency shall install signage along Franklin Avenue, Hollywood Boulevard between Vermont Avenue and La Brea, Sunset Boulevard, Fountain Avenue, Santa Monica Boulevard, Melrose Avenue, Gower Avenue, Vine Street, Cahuenga Boulevard, Highland Avenue and La Brea Avenue notifying drivers that it is illegal to unreasonably sound, blow or operate the horn (pursuant to Section 114.02 of the LAMC) or play loud music in excess of that permitted in Section 115.02.

2. The City Council shall direct the Los Angeles Police Department is rigorously enforce noise related violations in the Hollywood Community Plan Area, and specifically those areas identified in the mitigation above as certain levels noises are detrimental to the health and welfare of the citizenry or the public interest.<sup>1</sup>

**Geology and Soils**

*Assessment:*

2. No discussion about the strength or ability of areas like the reservoir to withstand an earthquake. In the section on Tsunamis, floods and Seiche (page 4.5-5) there is no risk mentioned

*Further analysis & mitigation:*

3. Further analysis of structural and seismic stability of the Hollywood Reservoir.
4. Further analysis of the structural and seismic stability of the subway system throughout the Plan area.
5. Soil and geologic conditions are site-specific and there is little, if any, cumulative relationship between this project and other projects in the area.

**Cultural and Archaeological Resources**

*Assessment:*

The L.A. CEQA Thresholds Guide asks if a would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, which may be important individually or as part of a district or grouping of complementary resources.

The area between Santa Monica Boulevard, Highland Avenue, Wilcox Avenue and Sunset Boulevard includes the following inventory of potentially historic properties.

---

<sup>1</sup> Section 111.05 states that "the Police Department shall have the power and duty to enforce the following noise control provisions of this Code: Section [41.32](#), Section [41.40](#), Section [41.42](#), Section [41.44](#), Section [41.57](#), Section 63.51(m), Section [112.01](#), Section [112.04](#), Section [112.05](#), Section [112.06](#), Section [113.01](#), **Section [114.01](#) through Section [114.05](#), inclusive, Section [115.02](#)**, and Section [116.01](#)

- 1) All but three (3) properties on the 1100 block of Hudson Avenue includes structures built prior to 1966, therefore potentially eligible for historic designation. All but four (4) properties include structures building during the 1920's.
- 2) All but one (1) property on the 1300 block of McCadden Place includes structures prior to 1966, therefore potentially eligible for historic designation. Most of the structures were built prior to 1930.
- 3) All but three (3) properties on the 1300 block of Las Palmas Avenue includes structures built prior to 1966, therefore potentially eligible for historic designation. Many of the structures were built prior to 1920.
- 4) All but one (1) property on the 1300 block of Cherokee Avenue includes structures built prior to 1966, therefore potentially eligible for historic designation. Many of the structures were built prior to 1920.
- 5) All but one (1) property on the 1300 block of June Street includes structures built prior to 1966, therefore potentially eligible for historic designation. Many of the structures were built prior to 1930.
- 6) All properties on the 1300 block of Seward Street include structures built prior to 1966, therefore potentially eligible for historic designation. Many of the structures were built prior to 1930.
- 7) All properties on the east side of the 1200 block of McCadden Place include structures built prior to 1966, therefore potentially eligible for historic designation. Most of the structures were built during the 1950's.
- 8) All but four (4) properties on the 1200 block of Las Palmas Avenue includes structures built prior to 1966, therefore potentially eligible for historic designation.
- 9) All but six (6) properties on the 1200 block of Cherokee Avenue include structures built prior to 1966, therefore potentially eligible for historic designation.
- 10) All but five (5) properties on the 1200 block of June Street includes structures built prior to 1966, therefore potentially eligible for historic designation.
- 11) All properties on the 6500 block of Lexington Avenue include structures built prior to 1966, therefore potentially eligible for historic designation. Most of the structures were built during the 1920's.
- 12) All but two (2) properties on the 1200 block of Wilcox Place include structures built prior to 1966, therefore potentially eligible for historic designation.
- 13) All properties between the 6500 to 6700 blocks of DeLongpre Avenue include structures built prior to 1966, therefore potentially eligible for historic designation. Many of the structures were built prior to the 1930's.
- 14) All properties between the 6500 to 6600 blocks of Leland Avenue include structures built prior to 1966, therefore potentially eligible for historic designation.
- 15) All but one (1) property on the 6500 block of Homewood Avenue includes structures built prior to 1966, therefore potentially eligible for historic designation. Most of the structures were built during the 1920's.

*Further analysis & mitigation:*

Further analysis must be done to ensure potentially significant historic resources are not lost. This would be done through the following mitigation measure:

- 1) The City (the Director of the Planning, the Cultural Heritage Commission, or the City Planning Commission) shall initiate a Historic Preservation Overlay Zone for the area bounded by Santa Monica Boulevard, Highland Avenue, Wilcox Avenue and Sunset Boulevard.



*Assessment:*

The L.A. CEQA Thresholds Guide asks if a would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, which includes resources evaluated as potentially significant in a survey or other professional evaluation?

Pages IV.C-3 to IV.C-8 of the Draft Environmental Impact Report (*ENV 2007-3810-EIR*) for the Hollywood Archstone Project found several potential historic districts identified in a survey by Hollywood Revitalization in 1979, which studied from Santa Monica Boulevard on the south to Sunset Boulevard on the north, and from Highland Avenue on the east to La Brea Avenue on the west, and included the “1100-1400 Block of Orange Drive” district and the “6800-7000 Block of Lexington Avenue” district, and other districts along Mansfield Avenue, Citrus Avenue, and Sycamore Avenue.

*Further analysis & mitigation:*

The Draft EIR for the Hollywood Community Plan Update does not acknowledge or consider the results of the Hollywood Revitalization study or the subsequent analysis done as a result of the EIR for the Hollywood Archstone project. The DEIR for the Hollywood Community Plan Update must include this analysis and impose appropriate mitigation on the affected properties. This would include:

- 1) For the “1100-1400 Block of Orange Drive” district and the “6800-7000 Block of Lexington Avenue” district the following “Q” Condition would be adopted:
  - a. In consultation with the City’s Office of Historic Resources, the applicant of any building or demolition permit shall diligently pursue feasible suitable donor sites for relocation of the seven contributors out of the eight Orange Drive properties and the one Lexington Avenue property in order that the historic setting and context of the bungalows remain consistent. Suitable sites for the Orange Drive properties shall be located within the Orange Drive district. A suitable site for the Lexington Avenue property shall be located within the Lexington Avenue district. A structural engineer/mover specializing in the relocation of historic properties is recommended to oversee this work. If feasible suitable donor sites are not found and the buildings cannot be relocated, then the impact of demolishing the eight bungalows would be significant and unavoidable.

A feasible suitable donor site shall be a site that is capable of being acquired in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Among the factors that may be taken into account when addressing the feasibility of suitable donor sites are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, and whether the applicant can reasonably acquire, control or otherwise have access to the donor site.

- b. Regardless of whether the bungalows are demolished or relocated, the properties shall be photographed and documented in their current location in an archival manner similar to Historic American Buildings Survey (“HABS”) standards, and the documentation shall be donated to a suitable repository, such as the Hollywood Heritage. The National Park Service’s website, [www.nps.gov](http://www.nps.gov), defines the HABS standards as the following: “The Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation define the products acceptable for inclusion in the Heritage Documentation Programs (HABS/HAER/HALS) collections in the Library of Congress as measured drawings, large-format black & white photographs, and written histories. They require that the documentation captures the significance of the site or structure; is accurate and verifiable; has archival stability; and is clear and concise. “The Guidelines provide advice and technical information on meeting the standards. Most important, they outline an approach to historic architecture, engineering and landscapes that helps ensure the documentation will meet the Secretary's Standards while creating a comprehensive understanding of the site or structure. They also provide recommendations on research methods and report organization, line weight and sheet layout, photographic paper and negative preparation, and the disposition of field notes”.

- 2) The City (the Director of the Planning, the Cultural Heritage Commission, or the City Planning Commission) shall initiate a Historic Preservation Overlay Zone for the area bounded by Santa Monica, La Brea, Sunset and Highland.<sup>2</sup>

5-33  
cont.

**Safety/Risk of Upset**

*Assessment:*

1. The Plan intends to change 10.99 acres of industrially zoned land to another use. This land may contain hazardous materials due to its current use, and therefore could cause an increased risk of exposure to hazards as a result of the changed land use and/or zone.
2. The Plan intends to adopt the Hybrid Industrial Incentive "Q" Condition which states:  
*Residential uses shall only be permitted if a project incorporates a minimum FAR of 0.7:1 targeted media-related industrial uses, including: film, tape, television, video, internet and other media production, editing and reconstruction; film archiving, storage and exchange; studio equipment manufacture, rental and storage; music, film, television and internet publishing; sound recording; broadcast studios; facilities for the development of software and other computer and media-related products and services.*

5-34

5-35

*The result of this incentive would effectively allow industrially zoned land, which currently is planned to be developed at a 1.5 FAR, to instead be developed with only .7 FAR of industrial related uses, a potential loss of .8 FAR.*

*Further Analysis & Mitigation:*

1. The EIR must analyze those parcels which are being changed from industrially zoned property to another use and proposed, if necessary, mitigation measures relating to the clean-up of hazardous materials.
2. The EIR must analyze those parcels where the Hybrid Industrial Incentive "Q" Condition is being adopted and acknowledge the potential loss of industrial floor area as a result of proposed incentives. Appropriate measures must be adopted to mitigation any potential impact.

5-36

5-37

CHNC's H-CPU Ad-Hoc Committee presented its recommendations to the Board on May 23, 2011. The Board voted unanimously to accept and approve the Committee's comments and recommendations.

Sincerely,



Scott Campbell  
President  
Central Hollywood Neighborhood Council  
323-252-9870  
[AftonNeighbor@aol.com](mailto:AftonNeighbor@aol.com)

cc: Council President Eric Garcetti, CD 13  
Council Member Tom LaBonge, CD 4  
Marcel Porres, CD 13  
Renee Weitzer, CD 4

<sup>2</sup> This mitigation would be consistent with the Cumulative Impact analysis for ENV 2007-3810-EIR, which provides that the demolition of other similar bungalows on the 1100- 1400 Block of North Orange Drive, or the larger area bounded by Santa Monica, La Brea, Sunset and Highland, would diminish the pool of historic single family housing stock in this part of Hollywood, the cumulative effect on historic bungalows in Hollywood would be significant.

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PLANNING AND ENTITLEMENT  
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May 31, 2011

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**JUN 01 2011**

**ENVIRONMENTAL**

Srimal Hewawitharana  
City of Los Angeles  
Department of City Planning  
200 Spring Street, Room 750  
Los Angeles, CA 90012

**COMMENT ON THE  
DRAFT EIR FOR THE HOLLYWOOD  
COMMUNITY PLAN**

On behalf of the East Neighborhood Council's Planning and Entitlement Review Committee, please note the summary of findings based upon economic studies and review of the proposed plan:

- Population decrease between the years 2000 and 2010 within the Hollywood community plan varies within neighborhoods and range from 3.8% to 14.9%. | 6-1
- Vacancy rates in Los Angeles County have increased from 5.6% to 6.1% which would impact the Hollywood plan area due to the proposed increase in density. | 6-2
- Office vacancy rates have increased from 16% to 17%. | 6-3
- The forecasted growth in the retail sector faces risk due to increasing prices for food and gasoline which would reduce discretionary spending. | 6-4
- The City of Los Angeles has always failed to implement the standards set forth in the community plan. | 6-5
- The Draft Plan fails to consider the public's desire for parking access and the need for community resources. | 6-6

According to the proposed plan, local population forecasts are based upon SCAG's analysis which erroneously concludes that the population within the Hollywood area has increased. Please refer to the 2010 Census Data as reported by the New York Times: <http://projects.nytimes.com/census/2010/map>. According to the census data, the population decrease varies between neighborhoods: it ranges from 3.8% to 14.9% total decrease which does not justify the plan's increase in density by up to 600% in certain neighborhoods. According to our analysis of the 2010 census, the population in the Hollywood Community Plan area was 199,249 which is almost 15,000 less than the planning department's 2005 estimate. | 6-7

The Draft Plan calls for an increase in density along commercial areas by encouraging mixed use "live-work" developments and an increase in commercial developments without considering their potential, negative impacts due to current economic conditions and forecasts. According to Los Angeles Economic Development's (LAEDC) February 2011 report and forecast, both the apartment and nonresidential sectors will continue to be negatively impacted by the current economy. According to the report, Los Angeles County was the only area that experienced an increase in the apartment vacancy rate by the third quarter in 2010. The vacancy rate increased to 6.1% from 5.6% | 6-8

from a year ago while the average rental rate fell by 0.4% (see LAEDC Economic Forecast, February 2011 p. 91). Due to the high rental rates, many renters are choosing to “double-up” to save money. Theoretically from an economic perspective, the downward trend in rental rates should continue until an affordability threshold is reached. However, in my experience as a professional in this field, the elimination of rent control on new developments allowable under the proposed plan would negate the downward trend in rental rates by creating an incentive to reduce the number of rent-controlled units which would result in a reduction in affordable housing units.

6-8  
cont.

The LAEDC report also states the following: the vacancy rate for office space increased by the end of 2010-the average vacancy rate was 17% compared to 16% from a year ago while vacancy rates for 2011 will remain elevated due to weak job growth (LAEDC Economic Forecast Feb. 2011, p. 93-94); retail sales in Los Angeles County are expected to increase 5.7% in 2011. However, the key risk to the forecast is the increase in food and energy prices. Food and gasoline prices are relatively inelastic. (LAEDC Economic Forecast Feb. 2011, pp.101-102).

6-9

Given the above forecasts for rental, office space, and retail, the Hollywood Plan fails to consider the current economic situation and erroneously calls for a substantial increase in commercial building density which may result in the real estate market’s inability to absorb the additional units.

6-10

Due to the proposed increase in density, a multitude of developments will result in non-homogeneous designs within neighborhoods. Properties benefit from similar and harmonious features. This has been proven in West Hollywood where the city encouraged property rehabilitation and neighborhood preservation. Contrary to this, the deviations from the existing Hollywood Community Plan have resulted in developments with modern architectural designs that do not blend into established neighborhoods and has negated historic preservation efforts. Due to the proposed intensive land uses, developers will go above and beyond the proposed standards as they have done in the past. In other words, they will continue to ask for entitlements and variances which will result in deviations from the proposed plan as well. The community plan has always failed to implement its set standards.

6-11

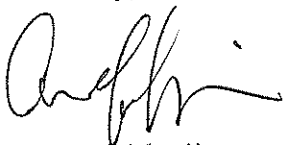
Finally in 2010, a public survey was completed by the Central Hollywood Community Studio which has been disregarded by project developers. According to the survey, which was undertaken in conjunction with the Hollywood Community Redevelopment Agency, negative changes were expressed toward the following: “traffic (67%), access to parking (70%), affordable rent (50%), ....” The survey further indicates that respondents with higher levels of education tend to drive more and avoid public transportation (43% of respondents) while 68% want more community resources such as libraries and museums: Source: Central Hollywood NOW Survey 2010 Hollywood Community Studios. In contrast, the proposed plan calls for an increase in density in areas where the need for public transportation is not the primary determinant for a demand in housing. Under the current community plan, numerous projects have used the density bonus law which has resulted in entitlements “by-right” rather than implementation of set standards. This has resulted in a reduction in parking allocation for new projects. Based upon data from the Central Hollywood Community Survey results, this will only result in a decrease in demand for new housing where availability of parking plays a significant role in the community.

6-12

The East Hollywood Neighborhood Council’s concern is that, based upon current economic studies, the proposed plan will have a negative impact on the community. Given the aforementioned increases in vacant residential and nonresidential units and the decrease in the overall population, the proposed plan will result in an oversupply of units. As in the past, the proposed plan, coupled with the current density bonus laws, will also result in deviations that will continue to set precedence on future developments and will fail to consider the needs of the community as expressed in public surveys.

6-13

Cordially,



Armen Makasjian  
East Hollywood Neighborhood Council  
District 5 Representative.  
Member Planning and Entitlement Review Committee  
Certified General Appraiser  
Property Valuation Instructor

# CITY OF LOS ANGELES

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ANTONIO R. VILLARAIGOSA  
MAYOR

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May 31, 2011

Ms Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Hewawitharana and Members of the Department of City Planning,

As the chairs of the East Hollywood Neighborhood Council's Public Safety Committee we are very concerned with many of the elements brought forth in the recent update of the Hollywood Community Plan's Environmental Impact Report (EIR). One specific concern is the section which addresses safety, (Section 4.3 on Public Services) regarding the mitigation measure for police services. (Please see quoted section on the following page, for reference.)

7-1

The EIR indicates that based on the current population we should have 898 sworn police officers. This figure is in stark contrast to the number of actual currently sworn officers, which is 314. Using this rubric, based on what the EIR indicates, an increase in the population of 24,636 by the year 2030 should increase the need to 996 officers to support this increased population.

While the EIR says that this should not be a concern or rather "not a significant impact" because the "mitigation measure is to have more officers" it has demonstrated no way of providing for these officers, especially in this time of economic hardship for the city.

Based on this data, if only 314 sworn police officers are the current status, when we should have over 900, we are only at 1/3 of the officers that we need. To increase this disparity between these numbers is not realistic. As representatives of the public safety of our stakeholders, we have serious concerns about this plan and cannot get behind it. In order to support this plan, we need specific and actual plans on how we will get the appropriate number of officers necessary to service Hollywood for the higher density since we do not have sufficient officer coverage now.

The reality of the situation, as I am sure you know, is that we already have a decrease in police and fire services and no indication of increased financing to cover this disparity. This blatantly seems like a recipe for disaster, especially since East Hollywood is serviced by three different LA Police Divisions (North-East, Hollywood, and Rampart).

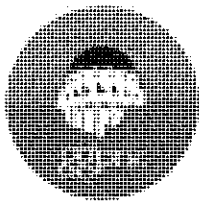
Please take into account these concerns when completing the final evaluation of the Hollywood Community Plan.

We thank you for your time and the attention you are offering to this matter.

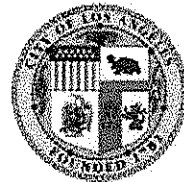
Respectfully yours,

Eric J. Moore  
Vice President, Public Safety Committee Co-Chair  
East Hollywood Neighborhood Council

Craig Cox  
Vice President, Public Safety Committee Co-Chair  
East Hollywood Neighborhood Council



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May 17, 2011

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ENVIRONMENTAL  
UNIT

Mary Richardson  
Srimal Hewawitharana  
Kevin Keller  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012

**SUBJECT: Draft Hollywood Community Plan (DHCP) and Draft Environmental Impact Report (DEIR): GGPNC Board Comments and Recommendations Submitted During the Public Comment Period March 3 through June 1, 2011**

Dear Ms Richardson and Hewawitharana and Mr. Keller:

This letter and the enclosures are comments and recommendations that are intended to be addressed in the Planning Department's written staff report on the DHCP and the written replies to written comments on the DEIR.

There are two sets of enclosures. One set includes general comments made by some of the nearly 50 stakeholders on the evening of March 30, 2011, Wednesday at the GGPNC and its Planning, Zoning, and Historic Preservation Committee forum on the DHCP and DEIR. The forum consisted of a power point presentation by the Planning Department staff, questions and answers, and public comments. All the audio portions were recorded.

The second set of enclosures includes the official questions, comments, and recommendations approved by the GGPNC Board, based on proposals from its committees. These six documents were submitted to the planning department, as well as elected and appointed city officials. They are dated as follows: May 5, 2005, July 18, 2006, April 15, 2008, May 25, 2010, August 24, 2010, and December 31, 2010.

The second set of enclosures follows this letter in their entirety. Additionally, they may be found by following the links below:

GGPNC 14 questions/concerns 5/5/05 ([CLICK](#))

GGPNC Recommendations adopted 7/18/06 ([CLICK](#))

GGPNC Revised Recommendations adopted 4/15/08 ([CLICK](#))

GGPNC Position on Draft Hollywood Community Plan May 25, 2010 Objections and Suggested Revisions ([CLICK](#))

GGPNC Letter to Planning Department, August 24, 2010, Urging extended review period for DHCP ([CLICK](#))

GGPNC Letter to City Planners, December 31, 2010, Preliminary Comments and Recommendations on Draft Hollywood Plan Urban Design Guidelines ([CLICK](#))

We look forward to written responses to the comments in this letter and the enclosures.

This submittal from the workshop and the re-submittal of past comments is based on an email and telephone conversation with Kevin Keller, Mary Richardson, and Richard Spicer after the March 30, 2011 workshop as the way to ensure that past and current comments from the GGPNC will be responded to in writing. The Department estimates that these responses will be in August or September 2011, as part of a workshop and public hearing for stakeholders in the Hollywood Community Plan area.

Thanks for past communications and work with the GGPNC Board and Committees and best wishes for the continued progress and completion of the DHCP and DEIR.

Sincerely,



Ron Ostrow  
President, GGPNC Board

Gary Khanjian  
Chairman, Planning, Zoning, Historic Preservation Committee

Cc: Jessica Kornberg, GGPNC Secretary  
GGPNC Governing Board

Enclosures as described above.

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**GGPNC@GGPNC.org**

May 4, 2005

Ms. Mary Richardson  
Los Angeles Department of Planning  
Community Planning Bureau  
200 N. Spring St., Room 667  
Los Angeles, CA 90012

**Re: Draft Hollywood Community Plan**

Dear Ms. Richardson:

The Greater Griffith Park Neighborhood Council ("GGPNC") has prepared the following questions regarding the Draft Hollywood Community Plan ("DHCP"). These questions reflect the concerns of the GGPNC. We hope to learn the answers to these questions at the mid-May scoping meeting.

- 1a. Will the proposed increased density in the DHCP for the GGPNC area actually increase public transit ridership? | 8-1
- 1b. Are there studies that demonstrate what conditions lead to, or do not lead to, increased public transit ridership when zoning and plans allow for increased density? | 8-2
- 2. What public and private transit will be in place and planned for areas of increased density (e.g., rapid, regular buses, public dash, private shuttle, metro, etc.)? | 8-3
- 3. What proposals will be included in the DHCP to provide parking at transit centers? | 8-4
- 4. Is the DHCP being developed in close coordination with the Los Angeles City Department of Transportation, the Los Angeles County Metropolitan Authority, Caltrans, and Southern California Council of Governments? | 8-5
- 5. What safeguards will be in the DHCP to preserve the character of the existing neighborhoods? | 8-6
- 6. How will the DHCP address affordable housing? | 8-7
- 7. How does the DHCP complement other areas of the city and plans in those areas? How does it conform, and how is it at cross-purposes? | 8-8
- 8. How does the DHCP increase walkability in the neighborhoods, such as on Hyperion west of Rowena? | 8-9
- 9. Once the DHCP is completed and approved, what is the time frame for implementation? | 8-10



10. Are sufficient funds available for completing the HCP?

8-11

11. What will the impact of the DHCP be on traffic and safety, for example, traffic flow, synchronized traffic signals, pedestrian walkways, and prevention of crimes?

8-12

12. Are architectural design controls on development included in the DHCP?

8-13

13. What will be the impact of the DHCP on school enrollment in the neighborhoods covered by the plan?

8-14

14. How will the DHCP identify and address sites of historical and cultural significance in the community?

8-15

Thank you for your consideration.

Sincerely,

Charley Mims, President

By Ronald Weinstein  
Chair of the Planning, Zoning and Historic Preservation Committee

cc: Mr. Bruce Carroll, Acting Secretary

Mr. Jonathan Brand

Mr. Richard Spicer

Ms. Molly Rysman

# **DRAFT HOLLYWOOD COMMUNITY PLAN (HCP): GGPNC'S**

## **RECOMMENDATIONS APPROVED BY BOARD 7/18/06**

### **Introduction**

The Greater Griffith Park Neighborhood Council (GGPNC) Board and Planning, Zoning, and Historic Preservation Committee (PZHP) developed, discussed, and approved these recommendations on the Draft HCP in June and July 2006. The recommendations are based on the Board and Committee members' participation in the planning process and information provided by stakeholders starting in 2005.

At our regular public meetings, we hosted several presentations and discussions of concepts and drafts of proposed zoning changes presented by Mary Richardson, her supervisors, and other staff. We participated in the two workshops (2005 and 2006) on the HCP. Maps and other materials from the workshops have been used at our meetings. The Board approved a set of questions on the plan (enclosed), which were mailed to the City Planning Department in May 2005 and submitted to the workshop in 2005. Information on the HCP, including the proposed zoning changes and map, has been posted for months on our web site: [www.ggpnc.org](http://www.ggpnc.org)

Relevant public comments were received at our regular meetings in 2005 and 2006, on our web site, and at our booth at the Los Feliz Street Fair in June 2006. Our second annual newsletter (June) included articles on the HCP and our forum on the Derby.

A major source of stakeholder perspectives on planning for the area was the forum that we hosted on a proposed development at the site of the Derby and Louise's Restaurant at Los Feliz and Hillhurst in the fall 2005. More than five hundred stakeholders attended a three-hour public forum at which they heard presentations for and against the proposed development, supplemented by technical information from city staff from Planning and Transportation.

At the forum, the questions, comments, and written responses to survey questions expressed a virtually unanimous support to sustain the historical and cultural character of the Derby as well as the residential area and the Los Feliz Village on Vermont and Hillhurst. Those views, including a major concern about the shortage of parking and worsening traffic congestion in the neighborhood, are reflected in the GGPNC's recommendations for the Hollywood Community Plan.

This neighborhood is one of the few within the City that has economic and social diversity with all strata of society integrated into the community. These recommendations are designed to preserve this very valuable characteristic.

8-16

### **A. Recommendations Re Proposed Zoning Changes by Street**

#### **1. Hillhurst, Franklin to Los Feliz**

8-17

Retain Current Zoning. Limit height to two stories. (Retain village character; parking shortage and traffic congestion, GGPNC's number 1 & 2 problems, would worsen with increased density; retain current light and openness.)

8-17  
cont.

2. Hillhurst, Sunset to Franklin and Vermont; Hollywood Blvd. to Franklin

Revert to pre-SNAP (Vermont-Western Station Neighborhood Area Plan) Zoning. Limit height to two stories

3. Hyperion, Fountain to Rowena.

Support the City Proposed Zoning Change to prohibit and phase out auto and auto related land uses. Plus support the procedures to implement this change. (Consistent with PZHP action in May to support auto use ordinance CPC 200c-1953-CA). [Ricardo Gomez proposed and is following up.]

4. Hollywood Blvd., Hillhurst to Vermont; Hollywood Blvd, Vermont to Western; Western, Hollywood Blvd. to Franklin.

Support City Proposed Zoning Change Increase as part of Vermont-Western Station Neighborhood Area Plan (SNAP) (Adopted by city earlier to encourage greater residential density and neighborhood commerce at/near rail transit stations and bus/DASH transit on Vermont, Hillhurst, Sunset, and Hollywood).

**B. Historic Preservation Overlay Zone (HPOZ) Study and Implementation Procedures**

Support the completion of the HPOZ study by the end of December 2006, including the review of the consultant's report by City Planning staff. Include the study in the HCP by reference

8-18

Support the start of the process to examine the pros and cons of implementing the HPOZ study and listing of the local, state, and federal tools and funding sources useful for implementing the recommendations of the study. Include the implementation process in the HCP, tools, and funding by reference

**C. GGPNC's Questions on HCP (May 2005) Transformed into Policy Recommendations [Questions mailed to City Planning Department and submitted at the Department's workshop in May 2005.]**

8-19

1. Retain historical residential neighborhood character of the GGPNC area [Q5 and 14]. (See also Historic Preservation Overlay Zone Study above at B.)

2. Retain historical character of the Los Feliz (Hillhurst and Vermont) Village. [Q5 and 14]. (See Historic Preservation Overlay Zone Study above at B. See also GGPNC recommendations on the proposed development at the Derby/Louise's on southwest site at Los Feliz and Hillhurst intersection. See also decision of the City Council that designates the building containing the Derby as a Cultural-Historic Monument.)	8-19 cont.
3. Retain and improve walkability in the GGPNC area [Q6].	8-20
4. Explore possibilities for neighborhood parks in the GGPNC area. Include in the plan and Draft Environmental Impact Report on the HCP public and private funds (including fees on development) for increasing and improving parks and open spaces.	8-21
5. Account for and provide school classrooms K through 12 needed to serve the new population and employment forecasts by the HCP. The plan should explore and promote possible multiple uses of existing and future school sites for recreation, senior, and other community needs.	8-22
6. The HCP and Draft Environmental Impact Report (DEIR) should demonstrate how traffic would be managed to retain no more and preferably less than current traffic congestion, through appropriate means and incentives, such as carpools, rail, bus, shuttles, trams, bikes and bike facilities, and walking. Use public and private incentives [Q1a/b, 2].	8-23
7. The HCP and DEIR should demonstrate how parking facilities, existing and new, would be managed and built to improve parking and meet the demand for parking, based on the population and employment forecasts in the HCP [Q3].	8-24
8. The HCP and DEIR should demonstrate how the proposed changes in permitted uses would promote affordability of housing [Q6].	8-25
9. Develop the HCP in close cooperation with city planning, transportation agencies (local, regional, state, and federal), recreation and parks commission, and the Los Angeles Unified School District and private schools.	8-26
10. Include in the plan and DEIR sources of funds to implement the HCP.	8-27
<b>D. Signage: Include appropriate restrictions on signs and billboards.</b>	8-28
<i>GGPNC HCP Approved Recom 5.doc</i>	

**GGPNC OFFICERS**

**PRESIDENT**  
Charley Mims

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Rosemary De Monte - Outreach

**SECRETARY**  
Kurt Rademaekers

**TREASURER**  
Joel Friedman

**CITY OF LOS ANGELES**



**GREATER GRIFFITH  
PARK  
NEIGHBORHOOD  
COUNCIL**

**GREATER GRIFFITH PARK  
NEIGHBORHOOD COUNCIL**

**Certified Council #36**

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GGPNC@GGPNC.org

April 16, 2008

S. Gail Goldberg  
Director of Planning  
Department of Planning  
City of Los Angeles  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Proposed Revision to Hollywood Community Plan

Dear Ms. Goldberg:

With our letter to you of September 11, 2006 ("2006 letter"), we gave your Department our comments and advice with respect to the then-proposed revised Hollywood Community Plan to the extent it directly affects our area.

In the year and a half since our advice we have gained more insight into the needs and desires of our stakeholders. We are now advised that your staff is in the process of completing its review of comments and advice received and is considering the proposed revised plan for issuance to the public. Therefore, we have reviewed our advice contained in our 2006 letter, and we advise you as follows:

We confirm the advice given you in the enclosure to our 2006 letter with the following modifications:

1. **Hillhurst, Franklin to Los Feliz.** Our comments remain the same except that the first sentence should read: "Retain Current Zoning, except limit the height to 25 feet."
2. **Hillhurst, Sunset to Franklin, and Vermont, Hollywood to Franklin.** Our comments remain the same except the last sentence should read: "Limit height to 25 feet."
3. **Hyperion, Fountain to Rowena.** The FAR should not be increased higher than 1:1 and the heights allowed should be limited to 25 feet northerly of Tracy and 30 feet southerly of Tracy.

8-29

4. There should be a new paragraph 5 under A as follows:

**Down zoning to current usage.** All areas in our community in which the predominant current usage is single family or duplex should be down zoned to that prevalent usage.

5. Item 4 in our Section C should be amended to provide for an increase in the number of neighborhood parks in our area.

6. Our Section D should be amended to read:

All new billboards shall be prohibited.

Every billboard not demonstrably built or modified with a valid building permit, if so required at the time of construction or modification, shall be removed before any discretionary action may be applied for.

There shall be no modification of any existing billboard to provide for electronic "enhancement" or conversion to any other nontraditional style. No billboard shall have any audible sound.

For ease of your review and the review by your staff we enclose the advice given with our 2006 letter, modified as set forth above.

We understand that your staff is in the process of responding to the questions contained in our letter to Mary Richardson dated May 4, 2005, and we eagerly await such responses. A copy of that letter is also enclosed for your information.

Very truly yours,

Charley Mims, President



By Kenneth E. Owen, Chair, Planning, Zoning and Historic Preservation Committee

Enclosures:

Revised advice and May 4, 2005 letter

Cc: Renee Weitzer with enclosures

Mary Richardson, with enclosures

8-29  
cont.

## **DRAFT HOLLYWOOD COMMUNITY PLAN (HCP): GGPNC'S**

### **RECOMMENDATIONS APPROVED BY BOARD 7/18/06 revised 4/15/08**

#### **Introduction**

The Greater Griffith Park Neighborhood Council (GGPNC) Board and Planning, Zoning, and Historic Preservation Committee (PZHP) developed, discussed, and approved these recommendations on the Draft HCP in June and July 2006. The recommendations are based on the Board and Committee members' participation in the planning process and information provided by stakeholders starting in 2005.

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#### **A. Recommendations Re Proposed Zoning Changes by Street**

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**2. Hillhurst, Sunset to Franklin and Vermont; Hollywood Blvd. to Franklin**

**Revert to pre-SNAP (Vermont-Western Station Neighborhood Area Plan) Zoning. Limit height to 25 feet**

**3. Hyperion, Fountain to Rowena.**

**Support the City Proposed Zoning Change to prohibit and phase out auto and auto related land uses. Plus support the procedures to implement this change. The FAR should not be increased higher than 1:1 and the heights allowed should be limited to 25 feet northerly of Tracy and 30 feet southerly of Tracy.**

**4. Hollywood Blvd., Hillhurst to Vermont; Hollywood Blvd, Vermont to Western; Western, Hollywood Blvd. to Franklin.**

**Support City Proposed Zoning Change Increase as part of Vermont-Western Station Neighborhood Area Plan (SNAP)**

**5. Down zoning to current usage.**

**All areas in our community in which the predominant current usage is single family or duplex should be down zoned to that prevalent usage.**

**B. Historic Preservation Overlay Zone (HPOZ) Study and Implementation Procedures**

**Support the completion of the HPOZ study by the end of December 2006, including the review of the consultant's report by City Planning staff. Include the study in the HCP by reference**

**Support the start of the process to examine the pros and cons of implementing the HPOZ study and listing of the local, state, and federal tools and funding sources useful for implementing the recommendations of the study. Include the implementation process in the HCP, tools, and funding by reference**

**C. GGPNC's Questions on HCP (May 2005) Transformed into Policy Recommendations [Questions mailed to City Planning Department and submitted at the Department's workshop in May 2005.]**



1. Retain historical residential neighborhood character of the GGPNC area [Q5 and 14]. (See also Historic Preservation Overlay Zone Study above at B.)
2. Retain historical character of the Los Feliz (Hillhurst and Vermont) Village. [Q5 and 14]. (See Historic Preservation Overlay Zone Study above at B. See also GGPNC recommendations on the proposed development at the Derby/Louise's on southwest site at Los Feliz and Hillhurst intersection. See also decision of the City Council that designates the building containing the Derby as a Cultural-Historic Monument.)
3. Retain and improve walkability in the GGPNC area [Q6].
4. Increase the number of neighborhood parks in the GGPNC area. Include in the plan and Draft Environmental Impact Report on the HCP public and private funds (including fees on development) for increasing and improving parks and open spaces.
5. Account for and provide school classrooms K through 12 needed to serve the new population and employment forecasts by the HCP. The plan should explore and promote possible multiple uses of existing and future school sites for recreation, senior, and other community needs.
6. The HCP and Draft Environmental Impact Report (DEIR) should demonstrate how traffic would be managed to retain no more and preferably less than current traffic congestion, through appropriate means and incentives, such as carpools, rail, bus, shuttles, trams, bikes and bike facilities, and walking. Use public and private incentives [Q1a/b, 2].
7. The HCP and DEIR should demonstrate how parking facilities, existing and new, would be managed and built to improve parking and meet the demand for parking, based on the population and employment forecasts in the HCP [Q3].
8. The HCP and DEIR should demonstrate how the proposed changes in permitted uses would promote affordability of housing [Q6].
9. Develop the HCP in close cooperation with city planning, transportation agencies (local, regional, state, and federal), recreation and parks commission, and the Los Angeles Unified School District and private schools.
10. Include in the plan and DEIR sources of funds to implement the HCP.

**D. Signage:**

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**There shall be no modification of any existing billboard to provide for electronic “enhancement” or conversion to any other nontraditional style. No billboard shall have any audible sound.**

8-30  
cont.

Revised 4/15/08



## **GGPNC OFFICERS**

**PRESIDENT**  
Ron Ostrow

**VICE-PRESIDENTS**  
Tor Hyams - Administration  
Luisa Nubaravacharyan- Outreach

**SECRETARY**  
Jessie Kornberg

**TREASURER**  
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# CITY OF LOS ANGELES **GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL**

Your Neighborhood. Your Voice. Your Council.

May 25, 2010



**Certified Council #36**

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S. Gail Goldberg, AICP  
Director of Planning  
Department of Planning  
City of Los Angeles  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Dear Director Goldberg:

On May 18, 2010, the Greater Griffith Park Neighborhood Council (GGPNC) Board adopted by consensus the recommendations on the Draft Hollywood Community Plan documents from its following three committees: Planning, Zoning, and Historic Preservation (PZHP), Transportation, and Education. These recommendations are for consideration by the City Planning Department and city appointed and elected officials.

The recommendations, including comments, from the PZHP Committee are below in this letter, the enclosures are the goals from the Draft Hollywood Community Plan Text, and the recommendations from the Transportation and Education Committees.

The GGPNC has been actively engaged with the Los Angeles City Department of Planning regarding the proposed revision of the Hollywood Community Plan (Plan) since at least early 2005. These comments are based on months of review of draft documents made public during the summer and early fall of 2009.

The GGPNC Board sent to the Planning Department recommendations and questions on an earlier draft Plan in May, 2005, September 2006, and April 2008. The May 5, 2005 letter contains questions that remain unanswered. However, the draft Plan documents made public in the summer and early fall of 2009 appear to address some of the Board's and its committees' questions and recommendations. The above GGPNC actions are available at its web site: [www.ggpnc.org](http://www.ggpnc.org)

The Board and its Education, Transportation, and Planning, Zoning, and Historic Preservation Committees reviewed with interest the current partial drafts of the Plan.

Below are preliminary comments for your assistance in completing and modifying the Plan.

### **I. Preliminary Comments.**

A. We have concern that the Plan, having been in process for so many years, may be predicated on projected population, housing, and employment trends that are no longer the best available, and therefore the recommendations in the Plan may not be appropriate or necessary. We have asked your staff for the underlying predicates for these assumptions. We have not received a response. If the projections are in error, then the Plan would need to be rethought and modified to fit the revised projections.

8-31

B. The Plan should be modified to meet what we understand is the commonly adopted best practice of identifying problems and proposing solutions in each chapter.

C. The Plan should reflect, when discussing “affordable housing”, the common sense understanding that existing housing is the most affordable housing. The Plan ought not to be used as a tool to destroy existing housing under the guise of creating affordable housing when the purpose is otherwise. If the purpose of creating new purportedly “affordable housing” is to increase tax revenue and to create temporary constructions jobs, the Plan should honestly state the same and be a subject of discussion in the community affected by the Plan and the City at large.

D. The Plan should identify various possible options for economic development of a lasting nature and make recommendations to assist in the most favorable economic development possible.

E. The Plan should not presume funding for necessary infrastructure, but should propose methods for improving the existing infrastructure not simply as a condition to growth, but to support the existing population, housing, and businesses. See more below at II, C.

## II. Goals for the Plan

The Plan should explicitly state the goals for the community.

Those goals should include:

A. Preservation and refurbishment of the existing housing stock. This is to preserve the existing housing, which we deem to be the most affordable, and allow for the bringing of such housing up to current environmental standards. Thought should be given to economic assistance to owners of such properties.

8-32

B. Preservation of our current neighborhoods. We note many neighborhoods in the Plan area have special characteristics, which should be preserved and protected from homogenization.

C. There should be no increase in density in any part of the Plan area except that part of the area abutting principal means of effective transportation. This does not mean treating every street with a bus line as available for increased density. The people’s willingness to be inconvenienced by transportation projects should be considered along with measures to reduce the inconvenience. Moreover, there should be no increase in density in any area unless and until all aspects of the infrastructure reasonably necessary to support both the existing and proposed increased population, housing, and business have been put in place. Infrastructure includes (but is not limited to): satisfactory water supply to the city as a whole as well as water mains to the area; sewage removal and treatment; electric and gas utilities at an affordable cost, neighborhood parks, transportation, parking, and schools.

D. Provide funding for the city’s historic survey and for any Historic Preservation Overlay Zone (HPOZ) sought by members of communities in the Plan area.

E. Preserve the cultural and historic aspects of the Plan area including and beyond those identified as Historic Cultural Monuments in the Plan Appendix, text, and maps.

F. Provide a comprehensive street scape plan for the various parts of the Plan area, including street trees (to be done on a planned basis rather than the haphazard basis of the past), street lighting, and sidewalk appurtenances with a view to making the sidewalks attractive and avoiding the clutter partially sponsored by the city’s policy of

selling advertising. Note the success of the Virgil Village in the choice of street lighting and attractive comprehensive tree planting. Cobra lighting and the like are inappropriate.

8-32  
cont.

G. Provide for the development of small neighborhood parks located in areas in which there is a concentration of park using groups: adults and children.

H. Provide that Hollywood will ultimately be billboard free. The Plan should incorporate the current moratorium on new construction and should provide a mechanism to remove existing billboards: the illegal billboards should be removed without delay and the owners of legal billboards should be notified that their billboards will be removed within a sufficient period of time to allow return on investment. A good example of this approach is in the Los Angeles County plan.

I. Provide for parking at reasonable rates adjacent to all Metro stops.

J. Downtown Hollywood should not be left to nightclubs and tourists. It should be returned to its historic function of providing businesses to accommodate the many residents of the Plan area. Note the success of Old Town Pasadena and the failure of the past thirty years of efforts in downtown Hollywood.

### III. Specific Comments on Currently Available Portions of the Plan.

While we do not have Chapter 5 Community Facilities and Infrastructure and the Draft Environmental Impact Report, below are some preliminary comments on specific proposals in the publicly available portions of the Plan.

8-33

Support the enclosed nine vision goals of the Draft Hollywood Community Plan Text as stated in Chapter 3 Land Use Plan, page 39.

Support the enclosed comments on specific policies, programs and action in the Plan Text approved by the Transportation and Education Committees to the GGPNC Board.

Absence of comments on other parts of the plan means that no comments have been developed or that the comments developed and reviewed have not yet been acted on by a committee or the board.

Very truly yours,



Ron Ostrow, President

By Tom Wilson,  
April Chair, Planning, Zoning, and Historic Preservation Committee and Richard Spicer, Coordinator on Plan review.

Cc: Tom LaBonge, Councilman, District 4  
Eric Garcetti, President City Council  
Ed P. Reyes, Chair, Planning and Land Use Management Committee

Goals, policies and programs are numbered and identified with the initials "LU".

The vision of the Hollywood Community Plan can be summarized by the following goals:

- Conserve viable neighborhoods, districts, historic/cultural resources and public right of way
- Provide a range of employment and housing opportunities
- Make streets walkable
- Improve open space, parks and public spaces
- Provide adequate public infrastructure
- Provide adequate public services
- Encourage sustainable land use
- Expand mobility options
- Ensure that buildings and neighborhoods are well-designed

The following section introduces the goals of the Community Plan along with policies and programs that will be used to achieve these goals.

#### Land Use Goals, Policies and Programs

**Goal LU.1** Conserve viable neighborhoods, industrial districts, pedestrian-oriented districts, historic/cultural resources and alleys.

Many areas of the Hollywood Community Plan are well-planned and effectively serve the needs of the community. The Hollywood Community Plan identifies those areas where the existing uses or features are desirable and appropriate and where infill development should reinforce this existing context.

These areas include regionally significant employment districts (Map 13), areas with distinctive cultural resources (Map 14), historic neighborhoods (Maps 15-16), neighborhoods planned for single family uses, areas with distinctive topography, such as hillside areas (Map 23), existing transit-oriented districts (Map 4), the existing alley system (Map 20,) and existing pedestrian-oriented districts (Maps 21 and 22). The Hollywood Community Plan also protects identified historic resources, including resources which may or may not be located in change areas.

#### *Policies to conserve industrial jobs:*

**Policy LU.1.1:** Preserve the core of the Media District south of Santa Monica Boulevard for industrial uses (Map 13). Protect the Media District from encroachment by residential uses.

**Policy LU.1.2:** Prohibit all residential uses in the MR1 zones, except for accessory residential uses.

**GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL (GGPNC) BOARD ADOPTED ON MAY 18, 2010 THE FOLLOWING TRANSPORTATION COMMITTEE RECOMMENDATIONS ON CHAPTER 4 MOBILITY PLAN OF THE DRAFT HOLLYWOOD COMMUNITY PLAN TEXT, SUMMER 2009:**

**The Transportation Committee acted March 2, 2010. Chair: John F. John. Coordinator: Richard Spicer**

### **Introduction**

The introduction in the Mobility Plan, Chapter 4, describes briefly a ***few transportation problems*** in the Hollywood Community Plan (HCP) area and describes ***goals, policies, programs, and mitigation measures*** to address those problems. These solutions are organized by the topics outlined below in **bold type**.

The **draft recommendations** for the Transportation Committee include some general and specific statements, as well as suggestions to support, oppose, support or oppose with modifications, clarify, set aside, and other distinctions regarding the proposals in the Draft HCP Text, Chapter 4 Mobility Plan.

A **bonus recommendation** at the end is that the DHCP Text should describe and require the use of a newly developed set of analytical tools presented to stakeholder in February 2010 and available on line in March 2010. The set of tools were developed by the Center of Transit-Oriented Development, Reconnecting America.

The tools provide a profile of information for a 1/2 mile radius around each rail transit station in the City of Los Angeles. Information is included on current station area performance (e.g., transit ridership, mode to work data, and auto ownership rates), development potential by individual parcel, neighborhood changes, and existing and expiring affordable housing units.

Examples of the tools and information will be available at the meeting. On line, see <http://atod.reconnectingamerica.org/>

### **Problems**

“Provide Hollywood’s residents and visitors with as many mobility options as possible, so that their trip choices contribute minimally to the traffic congestion that already exists in this community,” from trips that begin or end in Hollywood or pass through this area. [page 93, paragraph 1].

“Traffic impact of new development allowed by the [draft] Hollywood Community Plan”, as determined in the study: Traffic Improvement and Mitigation Program [page 96, paragraph 3.]

“The proximity of residential neighborhoods to vibrant commercial districts, congested freeways, street closures due to special events, and congestion caused by big shows at entertainment venues, all contribute to overflow of traffic into residential neighborhoods.” [page 93, paragraph 3.]

**Recommend defining the amount of current and future traffic congestion quantitatively in specific street locations in Hollywood and its subparts in order to understand the scale and subareas of congestion caused by both local and pass through trips and extent of traffic to be mitigated.** [This information in substantial detail should be in the Draft Environmental Impact Report and summarized in the Mobility Chapter.]

8-34  
cont.

**Recommend that the Draft Environmental Impact Report include specific program and funding measures to mitigate significant traffic impacts; provide more detail than in the policies, programs, and funding measures in the mobility chapter; and include schedules and budgets: operating, capital, and studies.**

**Recommend that the names of institutions responsible for city-wide, county, regional, state, and federal transportation and environmental planning (including air quality) be added to the mobility chapter, including Los Angeles City and County Departments, Metro, Southern California Association of Governments, Caltrans, South Coast Air Quality Management District, CA Air Resources Board, Environmental Protection Agency, and Federal Department of Transportation, along with the schedule for plan and capital budget adoptions.**

## Goals

"Create a healthy, sustainable, and economically prosperous city in which jobs, services, and amenities are easily accessible to all residents and visitors, which respects the city's unique communities and neighborhoods and which is supported by a first class, multimodal transportation system (page 93, fifth paragraph.) The "overreaching goal of the City's transportation policies" in DHCP and City's General Plan Framework and Transportation Element.

8-35

Focus on mitigating "locally-generated traffic, that is trips which either begin or end in Hollywood, many of those trips generated in the expanding residential and commercial uses in the Hollywood downtown regional center are anticipated to be short trips. [page 93, paragraph two.]

## Traffic Improvement and Mitigation Program (TIMP)

**Recommend support of the overall goal M.1 with the understanding each policy will be considered separately.** [page 96, paragraph 6]

Transportation System Management (TSM) Strategies [page 96 - 98, Policies M.1.1-M.1.2.15]

**Recommend supporting all the policies, except as indicated below:**

**Clarify and identify which "several locations highlighted for attention, page 97, two sentences at top of page.**

**Policy M.1.2.6: Withhold recommendation until clarify meaning of parking restrictions to provide additional capacity in periods of peak traffic, page 97.**



Policy M1.2.7: Withhold recommendations until clarify the meaning, signing, and costs involved to drivers in “improve enforcement of all parking restrictions...including tow-away response”, especially with regard to the procedures, practices, incentives, and appeals pertinent to “tow-away response”, page 97.

Policy M.1.2.8: Withhold recommendation until explain and identify locations of types of improvements on all Major Class II and Secondary Streets, and along collector Streets Throughout the HCP area, especially explain the impact of widening streets on traffic, sidewalks, and private and public property along the proposed street improvements, as well as notify stakeholders of proposed improvements, for certain neighborhood councils. page 97.

Policy M.1.2.9: Withhold recommendations until pros and cons are explained regarding additions or prohibitions of left turn along Hollywood Blvd. in East Hollywood, and clarify “implement improvements”, page 97.

Policy M.1.2.13: Withhold recommendations until clarify maintenance and rehabilitation of all highways and streets, as well as address how to fund, page 98.

Policy M.1.2.14: Withhold recommendations until explain meaning of “develop optimum street maintenance strategies with an emphasis on full-width resurfacing” and clarify distinctions and costs of filling pot holes, resurfacing periodically, and replacing concrete streets with concrete streets, page 98.

Transit Improvements (pages 98 - 99, Policies M.1.3 - M.1.3.7)

Recommend support these policies, except as noted below:

Policies 3.6 and 3.7: Withhold recommendations until on # 6 explain meaning and funding for “appropriate surface streets and freeways for preferential bus lanes, and # 7 explain meaning and funding regarding street improvements to facilitate movement of buses, such as “jog eliminations, street widenings, bus bays or turnouts, street signage, striping, colored pavement”, page 99.

Transit Access and Connectivity Strategies (page 99 - 100, policies M.1.4-M1.4.13)

Recommend support except as noted below for three policies below:

Policies #: 7, 11, and 13, until explain re taxi layover, especially on management, space required, and trash pickup; shared cars and basis for using on street parking; and articulated buses related to traffic interference and minimize driveways on streets served by this type of bus, page 100.

Non-Motorized Transportation Policies --Bicycling Mobility (page 100 - 102)

Non-Motorized Transportation Policies--Pedestrian Mobility (page 102)

Transportation Demand Management (TDM) Strategies (page 103 - 104)

Capital Improvements (pages 104 - 106)

Neighborhood Traffic Management Plans (pages 106 - 107)

Parking Policies (pages 107 - 109)

Bonus Recommendation Transit Oriented Development Information and Analysis Tools around Rail Stations in the City of Los Angeles Rail (not in the 2009 Draft HCP Text)

**1. Add a description of the Transit Oriented Development and Analysis Tools to the HCP Text, in the land use and mobility plan chapters 2. Require the use of these tools in proposed development around rail stations in the HCP area, and 3 make the information from the analysis available to stakeholders, city staff, and city elected officials.**

**GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL (GGPNC) BOARD ADOPTED ON MAY 18, 2010 THE FOLLOWING EDUCATION COMMITTEE RECOMMENDATIONS FOR THE DRAFT HOLLYWOOD COMMUNITY PLAN TEXT, SUMMER 2009:**

From the minutes of the April 27, 2010 Education Committee:

3. Hollywood Community Plan - Richard Spicer distributed summaries of the plan and focused on the impact the plan would have on schools (and parks). This is a 30-year plan. The Community Facilities Report and the Draft Environmental Report are due to be released in June. After that, the public will have a minimum of 45 days to respond, which is not much time given the size of the document, currently about 200 pages. The Zoning Ordinance will be adopted at the same time. The Planning, Zoning & Historic Preservation Committee has already prepared several pages of comments, as has the Transportation Committee. The Transportation Committee suggested changing some of the verbs from "encourage" to "require". They thought that some parts of the plan seemed developer-friendly. The plan calls for higher density in central Hollywood.

- Policy LU.6.7 regarding shared public use of non-classroom facilities: Marshall HS was forced to lock the gate to the new track/field because people were abusing it. In spite of posted signs prohibiting dogs and bicycles on the field, dogs are defecating on the artificial turf and bicycles are causing ruts, which must be rolled out. Principal Harrison is looking for alternatives, money and other programs, which would cover supervision of the field so that it can be open to the public.

- Policy LU.6.2/LU.6.3/LU.6.4: The goals regarding anticipating school populations are idealistic; the reality is that it is very difficult to estimate future enrollment.

- Policy LU.6.6: Proposed language change as follows: "~~Maximize the use of public schools for neighborhood use~~ *Create community school parks at older elementary schools in 'park poor' neighborhoods and maximize the use of local open space, public facilities and parks for school use.*"

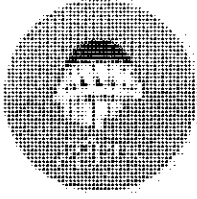
- Policy LU.6.9: Proposed language change as follows: "Encourage LAUSD and the Department of Recreation and Parks to continue the shared-use program to facilitate the shared use of schools and recreational facilities in Hollywood. Encourage public schools to site jointly with other community facilities, such as libraries, parks and auditoriums *and work with other community stakeholders (e.g., Business Improvement Districts, other public/private partnerships).*"

- Policy LU.6.10: Proposed language change as follows: "~~Encourage the provision of Support charter schools as an effective alternative method of delivering quality public educational facilities as the neighborhood level.~~"

- Policy LU.6.11: Delete the following proposed policy. Committee felt that charter schools should not be created for the sole purpose of alleviating overcrowding: "~~Encourage the location of charter schools in the Hollywood Community Plan as a means to alleviate overcrowded school conditions.~~" Add the following policy: "*Encourage partnerships between elementary*

*schools, middle schools and high schools to facilitate the development of shared educational opportunities."*

- Policy LU.6.14: Proposed language change as follows: "~~Encourage~~ *Require* public school design that buffers classrooms from *negative* noise and *air quality* sources. Incorporate noise mitigation measures to reduce adverse environmental impacts in compliance with California Environmental Quality Act (CEAA) and *South Coast Air Quality Management District (SCAQMD) Guidelines.*"
- Policy LU.6.23: Proposed language change as follows: "Support the school-specific agreements with LAUSD which will enable communities to jointly use schools for recreational purposes *and community/school parks.*"
- Policy LU.6.27: Proposed language change as follows: "Promote the provision of security and patrols of public parks and recreational facilities by the Los Angeles Police Department *and the Department of Recreation and Parks.*"



**PRESIDENT**  
Ron Ostrow

**VICE PRESIDENTS**

Tor Hyams - Administration  
Luisa Nubaravacharyan - Outreach

**TREASURER**

Christina Khanjian

**SECRETARY**

Jessica Kornberg

**GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL**  
*"Your Neighborhood. Your Voice. Your Council"*



**CERTIFIED COUNCIL #36**

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August 24, 2010

Kevin Keller  
Senior City Planner  
Planning Department  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

**SUBJECT: Draft Hollywood Community Plan (DHCP) Documents & Draft Environmental Impact Report (DEIR): Time for Public Comments**

Dear Mr. Keller,

On Tuesday, August 17, 2010, the Greater Griffith Park Neighborhood Council (GGPNC) approved, by consensus, a motion that the public comment period on the above documents be extended from the minimum 45 days to 180 days. On August 4, 2010, the board's Planning, Zoning, and Historic Preservation (PZHP) Committee approved the same motion by consensus.

The recommendation for a 180 days review period is based on the number of documents, the interconnection between them, their length and complexity, and the range of interconnected issues, goals, objectives, policies, programs, and implementation tools. Some neighborhood councils and resident organizations in the Hollywood Plan area raised these concerns during late July and early August via e-mail.

The DEIR, which the Planning Department staff hopes to post on line in August 2010, has been in preparation for up to two years. The revised draft land use and zoning document is to be posted this month. The revised DHCP Text (221 pages)

was posted on the city web site on July 15, 2010; six black and white print copies for each Neighborhood Council in the Hollywood Community Plan Area became available in mid-August with revisions in the text marked in grey. There is also another document of proposed changes in width and other features of streets and sidewalks.

The GGPNC Board has made initial comments and recommendations on DHCP documents in May 2010, 2008, 2006, and 2005. The Board supports the nine goals. The Board thanks the Planning Department for the meeting in June on those initial comments and that some of the suggestions from the board and its three committees were included in the DHCP Revised Text. The board still has other suggestions and concerns, which may be, addressed the DEIR and the revised land use and zoning documents scheduled for posting in August 2010.

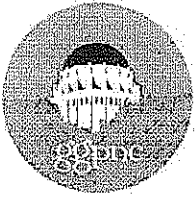
Thank you for considering the extension of time from 45 to 180 days for public comment on the DHCP Documents, including in the DEIR.

Sincerely,

A handwritten signature in cursive script that reads "Ron Ostrow".

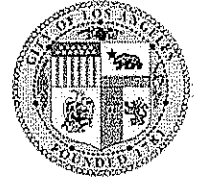
Ron Ostrow  
President, Greater Griffith Park Neighborhood Council

Cc: Councilman Tom LaBonge,  
Councilman Eric Garcetti  
Councilman Paul Koretz,  
William Roschen President City Planning Commission  
Vincent Bertoni, Acting Planning Director  
James Williams, Executive Assistant CPC  
Jessica Kornberg, Secretary, GGPNC  
Gary Khanjian, Chair PZHP Committee  
Richard Spicer  
GGPNC Board



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CERTIFIED COUNCIL #36

December 31, 2010

William Roschen, FAIA, President  
City Planning Commission  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Kenneth H. Fearn, Chairman  
CRA/LA Board of Commissioners  
Hollywood Regional Office  
6255 Sunset Blvd. Suite 2206  
Los Angeles, CA 90028

SUBJECTS: GGPNC preliminary comments and recommendations on:  
(1) Draft Hollywood Community Plan (DHCP), Chapter 7, Urban Design Guidelines, available in two publications: Revised Text, dated July 15, 2010, pages 164-212 (48) and Text, dated June 24, 2009, pages 172-220 (48). Page references in this communication are to the Revised Text July 15, 2010.  
(2) CRA Hollywood Blvd. and Franklin Ave. Urban Design Plan and Guidelines--10/25/10 redline version.  
(3) Sunset Blvd./Civic Center Urban Design Plan and Guidelines--9/15/10 redline version.

Dear Mr. Roschen and Mr. Fearn,

The Greater Griffith Park Neighborhood Council (GGPNC) Board requests that the Los Angeles City Planning Department (PD) and Community Redevelopment Agency (CRA) continue to notify neighborhood councils in

the Hollywood Community Plan area, including the GGPNC, of proposed changes and adoption of urban design guidelines, standards, and plans, as well as their application to proposed developments and signs. We further request that you make all documents available in multiple formats—on line, compact disk, power point, and print and that you confer with neighborhood councils.

8-37  
cont.

The Board recommends that the City Planning Commission and CRA Board and staffs continue to work together, as during the joint meeting of the two boards on December 2, 2010, on the development, comparison, coordination, checklists, sustainability, implementation, and enforcement of urban design guidelines, standards, and plans. All three documents should include schedules for adoption and explanations of how the design guidelines, standards, and plans will be implemented, monitored, enforced, and funded.

Regarding the Planning Department's Urban Design Guidelines in Chapter 7 of the DHCP Revised Text, dated July 15, 2010, the GGPNC Board supports the purpose, in general, (page 165), the nine goals (page 166), and ten "citywide urban design principles" (page 167).

The Board also supports all the checklist topics, the use of checklists by land use types, and the use of images (photos and drawings) with explanations to illustrate the numbered design concepts in each checklist.

The Board recommends adding a checklist on historic architecture, a section on implementation (retain emphasis on early consultation with staff), a section on funding, and a list of authors and the process for developing the chapter. All images should include word descriptions to clarify the intent of the image. We also recommend adding images to convey diversity of architecture.

Please see the enclosed attachment for more detail and suggested changes in language.

Thank you for your consideration of these preliminary comments and recommendations.



Sincerely,

A handwritten signature in cursive script that reads "Ron Ostrow".

Ron Ostrow, GGPNC President and Gary Khanjian, Chairman Planning,  
Zoning, and Historic Preservation Committee

cc: Councilmen: Eric Garcetti and Tom LaBonge

Michael J. LoGrande, Director; Kevin Keller, Mary Richardson, Blake  
Lamb (Planning Department)

Christine Essel, Chief Executive Officer, Kip Rudd, and Alison Becker  
(CRA)

Jessica Kornberg, GGPNC Secretary

GGPNC Governing Board

Enclosure: Preliminary Comments and Recommendations

GREATER GRIFFITH PARK NEIGHBORHOOD COUNCIL  
PRELIMINARY COMMENTS AND RECOMMENDATIONS ON DRAFT  
URBAN DESIGN GUIDELINES FOR THE HOLLYWOOD  
COMMUNITY PLAN AREA AND CENTRAL HOLLYWOOD

General Comments:

1. Notification and Involvement of Neighborhood Councils.

The Planning Department and Community Redevelopment Agency should notify neighborhood councils, including the Greater Griffith Park Neighborhood Council, of meetings and proposals on urban design guidelines; post the documents on web sites, provide CDs as well some print versions; and confer with the neighborhood councils on their comments and recommendations. The GGPNC is wholly in the HCP area and CRA has two project areas that collectively cover a significant part of the GGPNC area.

8-38

2. PD and CRA Continue Coordination.

PD and CRA staffs and boards should continue to work together in the development of and implementation of urban design plans, guidelines, and standards. To that end, build on the power point comparison on December 2, 2010, Joint Board meeting of the PD and CRA guidelines. For example, do a checklist comparing at general level what is included or not included: goals, principles, standards, checklist of guidelines included in a proposed projects, topics (signs, implementation process, protection of views, conservation and respect for Hollywood's historic buildings and architecture, open/space and plazas, streetscape, sidewalks, density, height, etc.). As in the power point presentation, compare specific topics for being the same, similar, or in conflict.

3. Processes and Schedules.

PD and CRA should explain in their urban design reports the processes and schedules for using and applying the guidelines to proposed projects and signs in decisions by staffs, CRA and CPC boards, zoning administrators, city council committees, city council, public hearings, and mayor.

4. Checklists.

PD and CRA should retain checklists as part of the guidelines and require that the checklists be completed by persons and organizations in their

proposed developments and signs so that stakeholders have a uniform basis for evaluating proposals.

8-38  
cont.

#### 5. Monitor and Enforced Guidelines.

PD and CRA should explain in their guideline reports how the guidelines and standards agreed to for specific developments and signs will be monitored and enforced during the construction and use of the projects.

#### 6. Environmental and Sustainable Design.

PD and CRA should ensure that the urban design guidelines and standards include provisions on sustainability, green construction (including references to different levels such as gold and platinum), as well as state clean air and clean water requirements and recommendations, and environmental impact reports.

Preliminary Recommendations and Comments on Proposed Urban Design Guidelines, Chapter 7 in the PD's DHCP Revised Text, dated July 15, 2010

#### 1. Support Purpose with Qualifications.

The GGPNC supports, in general, the purpose of the Urban Design Guidelines as stated in the first two paragraphs of chapter 7 on page 165 with strong emphasis on "further the Hollywood legacy by guiding future development with a consistent standards applied throughout the Plan Area".

This general support is subject to some qualifications as indicated below and above in the general recommendations and comments, such as notifying and conferring with neighborhood councils on the PD and CRA application of the design guidelines to particular proposed projects and signs.

#### 2. Recognize Whole and Effective Transit System.

Add to the second paragraph, second sentence after "between fixed rail" and its effective connections to an on-time bus and shuttle system, as well as bicycles "and land use."

#### 3. Identify Intent of All Images and Add Images on Range of Architecture.

Put words under each photo and drawing to convey the intent of the image, for example, on pages 164-167, add pictures to provide a sense of the diversity of residential and cultural architecture (e.g., Barnsdall Park) in neighborhoods in Central Hollywood, but especially in other neighborhoods.

4. Recognize Design Relationships.

Recognize the design relationship of this chapter to other city plans, as described in the two paragraphs under the section “Relationship to Other Plans in Hollywood”; and support “baseline design standards are needed for the whole of the plan area, based on land uses by utilizing special districts as key examples that will illustrate proposed design principles.” [Page 165]

5. Add a Checklist on Historic Architecture.

Cross reference historic architecture section in the land use chapter pages 55-68, which includes the Hillhurst Avenue Design District and the Oaks Hillside Study Area. Also cross reference the Appendix: Table 1 Designated Historic-Cultural Monuments and Table 2 List of Protected Buildings in Mixed Use Incentive Areas: Hollywood Community Plan. [Was in 2009 Text, but not in the 2010 Revised Text.]

6. Support the Nine Hollywood Community Urban Design Goals on page 166.

7. Support in general the ten “Citywide Urban Design Principles” on page 167, and “Early consultation with Planning staff, including consideration of long term maintenance, is one essential way of assuring implementation of these Principles through the urban design guidelines for Hollywood.” Consultation with staff should be mandatory.

8. Substitute Smart for Compact Growth.

In the first sentence on page 167, just after the title, delete “compact” before “growth” and replace “compact” with “smart”. “Compact” here is oversimplified and does not apply to many residential neighborhoods and commercial areas in the Hollywood Community Plan area.

9. Support all Seven of the Checklist Topics, the use of checklists by land use types, and the use of images with explanations, photos and drawings, to illustrate the numbered design concepts in each checklist. See above for recommendation to add a checklist category on Historic Design.

10. Add Credits on Authors and Process.

In the public meetings and the final draft of the HCP Text, include the process for developing the content of Chapter 7 and cite the authors and organizations responsible text, tables, drawings, and photographs.

11. Add Funding Options.

To fund the completion and implementation of the urban design guidelines and plans at PD, consider all the funding sources described on page 161 of the DHCP Revised Text and other effective and imaginative sources, including general revenue and public/private combinations.

**GGPNC/PZHP FORUM ON DHCP/DEIR MARCH 30, 2011: PUBLIC COMMENTS FOR THE LOS ANGELES DEPARTMENT OF CITY PLANNING FOR ITS WRITTEN RESPONSE.**

**COMMENTS BELOW PREPARED FOR TRANSMITTAL TO THE DEPARTMENT OF CITY PLANNING, ALONG WITH A COVER LETTER FROM GGPNC PRESIDENT, RON OSTROW, AND PZHP COMMITTEE CHAIR, GARY KHANJIAN AND THE SIX PAST BOARD COMMUNICATIONS ON THE DHCP/DEIR.**

**THE TRANSMITTAL INCLUDES A LINK TO A RECORDING OF ALL THE ORAL STATEMENTS MADE AT THE FORUM, INCLUDING INITIAL RESPONSES BY THE PLANNING DEPARTMENT STAFF TO SOME OF THE PUBLIC COMMENTS. THAT LINK MAY BE FOUND AT THE END OF THIS DOCUMENT.**

**THE TRANSMITTAL TO OCCUR PRIOR TO THE CLOSE OF THE 90 DAY PUBLIC COMMENT PERIOD ON JUNE 1, 2011.**

**Background**

The forum was developed by Greater Griffith Park Neighborhood Council and its Planning, Zoning, and Historic Preservation Committee in cooperation with the Los Angeles City Planning. The forum was held at Our Mother of Good Counsel Church's Parrish Hall during the period 6:30 to 9:30 pm. Several display boards were arrayed in the hall. Gary Khanjian served as the moderator. Mary Richardson made a power point presentation, supplemented by comments from her and Kevin Keller. Public comments followed, which included some responses by Mary and Kevin. They were assisted by two other staff from the Department who helped with the presentation and sale of the documents and CDs. About 50 people attended the forum. The PZHP Committee team also included Frank Masi, Jacqueline Kerr, Rosemary DeMonte, Richard Spicer, and Kiyoshi Graves who did an audio recording of the forum.

**Rex Link**

Are there any provisions that apply directly to **Griffith Park** and to parking in Griffith Park?

**Ed Hunt**

The proposed DHCP and its DEIR are based on **population growth forecasts**. In some areas of the HCP area, the growth permitted by these forecasts will be substantially exceed when combined with the additional growth permitted under the provisions of the **California Law SB 1818** and the companion Los Angeles City Ordinance.

The DHCP, DEIR, and related proposed zoning changes should be revised to prevent the growth in excess of the forecasts that would be permitted by SB1818 and the companion local ordinance. Moreover, the forecasts on which the DHCP and DEIR are based, should be revised to taken into account the **2010 census results** as well as facts that some of these areas in Hollywood have lost population between 2000 and 2010.

Those revisions should lead to a revision downward in the DHCP and DEIR proposed land uses and related zoning changes.

**John Mozzer**

DHCP and DEIR are **inconsistent with September 2010 proposed Hillside Ordinance.**

There needs to be **citywide design standards**, not just ones proposed for Hollywood Community Plan area.

**Nyla Arslanian**

The DHCP and DEIR should **foster good and attractive urban and building design.** How will these two documents accomplish that?

**Gerry Hans**

**Severe Park Shortages:** Jerry presented statistics documenting the severe shortage of park space per person, based on national standards, in the Hollywood Plan area and urged additional measures and funding be added to the DHCP and DEIR to address, reduce, and resolve this issue.

**Ken Owen**

On **Hillhurst Ave.** between Franklin Ave. and Los Feliz Blvd. retain existing zoning height and Floor Area Ratio (FAR), instead of the DHCP and DEIR proposed changes to the provisions in SNAP (Vermont Western Stations Neighborhood Area Plan).

On **Hyperion Ave.**, retain height and FAR as in existing zoning, for example at 25 feet not as proposed in DHCP and DEIR to increase height to 30 feet. The proposed plan is for the community and what the community wants so the Planning Department's reasoning to bring these features to a city wide average does not apply.

**Frank Masi**

**Supports** the DCHP's recommendation of a **Community Design Overlay Zone** for Hillhurst Ave. between Franklin Avenue and Los Feliz Blvd. and asked how our neighborhood can initiate this process with the Department of City Planning.

**Rosemary DeMonte**

In response to the Planning Department's draft/working schedule described orally at the workshop, Rosemary recommended that instead of having the Department's **Workshop/Open House and Public Hearing** for the entire Hollywood Plan area in August/September 2011, those events definitely should not be until **September** after public school start and people have returned to the city from summer vacations.

**Dora Herrera**

**Retain Los Feliz Village Character.** To retain the village character, she supports the Community Design Overlay and opposes the proposal in the DHPC and DEIR to increase height and Floor Area Ratios to be compatible with the SNAP (Vermont Western Stations Neighborhood Area Plan). Retain the small business character of the village.

## Richard Spicer

**Add Private Schools and Enrollments.** In the DEIR, in addition to the current and forecasted enrollment in public schools grades K through 12, add the same information for private schools because of their importance in providing education options in the GGPNC and Hollywood Community Plan areas. The same information should be provided on public and private pre-schools and on two and four year colleges.

**Revise Growth Forecasts.** Reassess in the DHCP and DEIR the growth forecasts for population, housing, and jobs by taking in to account the 2010 United States Census and the in process draft forecasts that are being developed by the Southern California Association of Governments, in consultation with counties and cities, including Los Angeles. Those draft forecasts are taking into account the 2010 census and other information.

**Areas of Significant Impacts Even with Mitigation Measures:** Based on the DHCP and DEIR, identify additional measures and funding to further reduce the significant impacts in these area. Those significant impact areas even with the proposed mitigation measures are: Parks, Water, Transportation, Air Quality, Noise, and Cultural Resources.

**Community Design Overlay:** Support the proposal in the DHCP and DEIR to develop a CDO to the Franklin Ave. between Franklin Ave and Los Feliz Blvd. In addition, recommend that CDO be developed on Franklin between Hollywood Blvd. and Franklin and also on Vermont Ave. between Hollywood Blvd. and Franklin.

**Historic Preservation Overlay Zone Study:** Identify in the DHCP and DEIR means and funding for completing the study in GGPNC area for the Los Feliz area.

**Nexus Study:** Support the Nexus Study and the funding set aside for that Study in the DHCP and DEIR. Urge that the study be started soon after the DHCP, related zoning, and DEIR are finalized and approved. The study would look at ways to reduce and resolve some of the significant impacts, such as traffic, resulting from the proposed land use and zoning.

**Links to an audio file of the GGPNC/PZHPC - Department of City Planning DHCP/DEIR  
March 30, 2011, Public Forum.**

### Zip File:

[www.kiyoshigravesconsulting.com/GGPNCMeeting3-30-11.zip](http://www.kiyoshigravesconsulting.com/GGPNCMeeting3-30-11.zip)

### MP3 Audio File:

[www.kiyoshigravesconsulting.com/GGPNCMeeting3-30-11.mp3](http://www.kiyoshigravesconsulting.com/GGPNCMeeting3-30-11.mp3)

The Zip file is a compressed file that you should be able to save to your computer, open and then listen to the audio.

The MP3 Audio file is audio, and you also should be able to save it to your computer, but some systems may try to default to playing the audio, rather than letting you save it.

That is why we have provided two ways to access the same file.

The download will take a bit of time, so give about 20 minutes of time to save the file.

Try the Zip file first. It should be more straightforward.





June 1, 2011

Ms. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

[Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

RE: Comments on the Hollywood Community Plan Update DEIR  
Case No. EIR-2005-5158-EIR  
State Clearinghouse Number: 2002041009

Dear Ms. Hewawitharana:

The Board of Directors of Hollywood Hills West Neighborhood Council (HHWNC) thanks the Planning Department of City of Los Angeles for the opportunity to respond in writing to the Hollywood Community Plan Update Draft Environmental Impact Report and for the extended deadline within which to review and comment on the document.

Certified in 2002, HHWNC represents well over 45,000 stakeholders, and spans as far west as Laurel Canyon, east as far as Cahuenga Boulevard, and portions of Lake Hollywood, north as far as Mulholland Drive, Universal Studios, the L. A. River, Forest Lawn Drive and Barham Boulevard, including the residential communities of Hollywood Knolls, Hollywood Manor, and Oakwood Garden Apartments and portions of Lake Hollywood, and south along Fountain Avenue from Fairfax Boulevard to La Brea Avenue and then Sunset Boulevard to Crescent Heights (West Hollywood boundary), and Hollywood Boulevard to Cahuenga Boulevard.

Our constituent footprint, including parts of, and areas adjacent to the Proposed Community Plan area, provides us with unique knowledge of the great potential of the Proposed Community Plan Update. However, it also provides us unique knowledge of the potential environmental impacts of the Proposed Community Plan Update.

It is our understanding that the Proposed Community Plan Update must be consistent with the General Plan of the City of Los Angeles. This may not be the document to address several inconsistencies with respect to zoning and designations, between the two plans, but we wish to note that we believe they exist.

Given the complexity and volume of information presented in the DEIR, we will focus our comments to several but not all of the major issues. In summary, the DEIR falls short of providing essential mitigations to address the severity of the impacts described. Almost all

9-1



proposed mitigations depend on complex administrative procedures, voluntary enforcement of policies and costly upgrades of equipment and infrastructure, complex and unenforceable administrative policies and hiring of additional staff. None of these mitigations are tied to tangible, identified, dedicated, or enduring funding sources. In light of the current local, state and federal economy, we believe that most of the proposed mitigations appear infeasible and/or enforceable.

We maintain that a nexus study must be a requirement of the Proposed Community Plan, to determine the measurable impacts of future development in Hollywood, and develop community-wide mitigations funded by impact fees. This plan requires unidentified, dedicated, and enduring funding sources. We urge that the nexus study be completed in no less than 12 months of the adoption of the Community Plan Update and include mitigation measures for all new development and a fee structure by which all new development would be required to pay its fair share of fees to mitigate all potential measurable impacts. No new development should be approved until the nexus study fee structure is implemented.

9-1  
Cont.

In the absence of an identified funding source for the nexus study, we maintain that a reduction in the intensity of development is the only meaningful mitigation at this time.

The following identifies DEIR deficiencies or inadequacies and describes why proposed mitigations do not appear to be sufficient or appropriate. Our recommendations are also included.

### **LAND USE**

There are, no mitigation measures proposed that guarantee insignificant development impacts. To the extent possible, all relevant policies found in this section of the document must be upgraded to requirements.

9-2

#### **Assessment:**

The goals, objectives and policies to promote the preservation of quality housing and development of new housing to meet the diverse economic and physical needs of the existing residents and accommodate the projected population increases are commendable.

As are the commercial land use goals, objectives and policies to encourage strong and competitive commercial sectors that promote economic vitality that serves the needs of the community via well-designed, safe, and accessible areas, while preserving historic and cultural character.

9-3

#### **Further analysis and mitigation should be required.**

1. The impact of three-story or higher structures directly adjacent to the back or side yards of single-family homes has not been adequately addressed in the DEIR. This is a significant land



use impact, as it renders the private use of one's back yard unusable. The impacts of the loss of privacy, shade and shadow, noise have not been addressed.

9-3  
Cont.

We propose as a mitigation measure that the DEIR require that all multi-family and commercially zoned properties adjacent to single-family zoned properties be restricted to a 30-foot, two-story height limit.

2. The noise impact of commercial and mixed-use developments adjacent to residential neighborhoods has not been adequately addressed in the DEIR.

9-4

We propose a mitigation measure be added to the DEIR that prohibits the commercial use of any rooftop on a mixed use development that is within 500 feet of a residentially zoned parcel.

We also propose that entertainment venues have noise abatement plans.

3. The entire Proposed Hollywood Community Plan area is parking deficient.

9-5

We propose that no commercial development be approved without an approved commuter management plan providing incentives, (e.g., financial, use of remote work sites) and infrastructure/amenities (e.g., showers) for users of transportation modes other than single occupancy vehicles.

9-6

We propose that no residential development be approved without an approved parking management plan that provides incentives, (e.g., financial) to encourage use of alternative commute modes, such as transit.

9-7

The impacts of the Proposed Hollywood Community Plan proposal to increase the allowed density to FAR 1.5:1 from 0.5:1 in the following three areas have not been adequately addressed:

9-8

SA 1.1 –East Corner of Hollycrest and Barham

SA 1.2—Northeast and Southeast sides of Barham and Lake Hollywood intersection

SA 1.3—Northeast Corner of Forest Lawn and Lake Hollywood

Barham Boulevard is the only major artery connecting the 101 (and Fire Station 76) and the adjacent residential neighborhoods. Identification of the impacts of and development of tangible, enforceable mitigation is needed to address the impacts of increased density in the corridor. Under today's conditions, it can easily take 40 minutes during heavy traffic periods to travel the short distance between Forest Lawn Drive and Lake Hollywood Drive.

9-9

It is not clear whether there have been parking need/impact studies and mitigations proposed to support the parking requirements of enhanced development specific to this area.

9-10

## **PUBLIC SERVICES**



There are, no mitigation measures proposed that guarantee insignificant development impacts. To the extent possible, all relevant policies found in this section of the document must be upgraded to requirements. The document itself states that implementation of the Community Plan “could result in a significant adverse impact to fire fighting capabilities in the area.” It also states “Without additional staff, facilities and equipment police service levels could drop and traffic conditions could adversely affect response times for police emergencies.” We cannot agree more.

9-11

Assessment:

The Proposed Community Plan must require upgrading of improvements of existing fire protection equipment and infrastructure, and additional police officers, civilian employees and corresponding increase or expansion in police facilities and equipment.

9-12

Further analysis and mitigation should be required.

All proposed mitigations require unidentified dedicated and enduring funding for costly upgrades and administrative processes and are therefore unenforceable and/or infeasible.

9-13

Emergency Management Services (EMS)

The document is silent with respect to impact on emergency preparedness. Reduced response times for police and fire due to increasing gridlock conditions as a result of the Plan’s proposed increased densities is mentioned but no meaningful mitigation is proposed. What is not mentioned is that the increased gridlock could exacerbate evacuation efforts by residents within and adjacent to the Proposed Hollywood Community Plan area in the event of fire or earthquake. The document is also silent on the impact on the arrival time of first responders.

9-14

Increased development and impact on traffic conditions can also complicate access to area schools and public assembly facilities that could be used as shelter locations for residents made temporarily or permanently homeless by fire or earthquake events.

9-15

The impact of the plan on high occupancy venues such as the Hollywood Bowl, (18,000), Ford Amphitheatre (1749), Kodak Theatre (3,600), and other high intensity uses such as hotels and entertainment centers is not addressed in the document. Under existing conditions, street closures are already implemented within the HHWNC area in an attempt to manage traffic impacts but they actually increase gridlock and divert traffic into residential areas.

9-16

The impact of the plan on aging above-ground utility infrastructure through-out the Proposed Community Plan and neighboring residential areas is also not addressed. The plan is also silent with respect to adequacy of water and water pressure to meet the needs of fire fighters.

9-17

Further assessment and mitigation should be required.

The document is silent regarding the impacts of the Proposed Hollywood Community Plan on emergency management services.

9-18



The document should mandate required mitigations for public services. The City must identify funding to conduct a nexus study to determine the impact of future development on Public Services in Hollywood, and develop community-wide mitigations funded by impact fees. This must be a requirement of the Community Plan. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and include mitigation measures for all new development and a fee structure by which all new development would be required to pay its fair share of fees to mitigate all potential Public Services impacts.

9-19

9-20

**UTILITIES**

The proposed mitigations are inadequate due to lack of funding required to implement them and enforcement mechanisms to ensure compliance.

9-21

Assessment:

Water

Given the uncertainties in the water supply horizon and in capacities of local delivery systems, impacts to water are considered potentially significant. There is no proposed mitigation measure offered beyond the promise to work with LADWP on future projects to ensure expansion, upgrade and/or improvement of the local water distribution system within the CPA.

9-22

Energy Resources

Proposed Mitigation measures include promotion of energy conservation to the “maximum extent” “cost effective and practical” and provision of incentives for development and use of alternative sources of energy.

9-23

Waste Water

Proposed mitigation measures include implementation of existing conservation measures, incentives for development of new markets and uses for reclaimed water, rehabilitate existing sewers in poor structural condition and construction of relief sewers.

9-24

Solid Waste

Proposed mitigation measures include implementation of the Solid Waste Integrated Resources Plan to achieve zero waste by 2025, provide incentives for processing and marketing of recyclable item and accelerate ongoing efforts to provide alternative solid waste treatment processes and expansion and establishment of landfill sites.

9-25

Further analysis and mitigation should be required.

Each of the proposed mitigations needs identified, dedicated and durable funding sources and enforcement mechanisms. Either reduced intensity development thresholds need to be adopted or a nexus study to develop community-wide mitigations funded by impact fees needs to be funded.

9-26



**TRANSPORTATION/CIRCULATION**

The environmental analysis clearly identifies specific street segments which would be impacted to a level of significance as a result of the implementation of the Proposed Community Plan Update but the document does not attempt to propose reasonable and tangible mitigation measures (only implementation of Proposed Community Plan policies) to reduce project impacts.

9-27

There are inaccuracies in roadway descriptions within the HHWNC area. This raises concern about the validity of any proposed mitigation in this area.

9-28

**Assessment:**

The document confirms that streets in Hollywood that are already extremely congested today will be significantly impacted by the level of development allowed by the Hollywood Community Plan. It notes that 41% of individual blocks on streets in Hollywood are over capacity today. It forecasts that 58% of the blocks will be over capacity in the future. It is logical to assume that as gridlock increases, drivers will increasingly seek alternative commute routes around the gridlock by using residential streets never intended to accommodate such traffic. The mitigation measures in the document are not adequate to protect our residential neighborhoods.

9-29

Three major intersections vital to neighborhoods in the eastern portion of HHWNC: Cahuenga East/Barham, Cahuenga West/Barham, and Barham/Lake Hollywood Drive -- are all considered to be at Failure levels already. Therefore, any increase in traffic through these intersections makes the existing Failure condition that much worse.

9-30

Another critical corridor within the HHWNC area is Highland Avenue between Hollywood Boulevard and I-101. It is a major connector to the San Fernando and San Gabriel Valleys. The existing high intensity commercial development is among the densest in the Community Plan area. Additional development and traffic congestion will contribute to increased commuter cut-through traffic that neighboring hill side residential streets cannot accommodate safely.

9-31

Laurel Canyon Boulevard is at HHWNC's western boundary. When it becomes congested (an event that occurs every week day,) commuters seek cut thought routes – residential roads cannot safely accommodate this increase in traffic safely.

9-32

As mentioned under the Public Services comments, we also have serious concerns about the impact of this additional traffic congestion on emergency services. The additional response time for fire trucks and paramedics to reach our neighborhoods due to this additional congestion will create life threatening situations.

9-33

A goal of the plan is to concentrate development in close proximity to major transit facilities and encourage transit usage and via mixed use development, encourage transit usage and walking and bicycle trips. This is very commendable, yet Table 4.5-12 illustrates that the Proposed Plan

9-34



results in “an increase in trips of nearly 55% as compared to Existing (2005) Conditions.” The proposed plan must be revised to reduce the amount of development allowed or enforceable transportation mitigation measures must be adopted, to reduce the increase in traffic. Public transit expansion and improvements must be expedited for it to ever become a travel mode of universal consideration, let alone choice.

9-34  
Cont.

P 4.5-30, states: “There would still be a significant adverse transportation impact as a result of the Proposed Hollywood Community Plan.” We couldn’t agree more and we do not believe that the City should be able to ignore this conclusion of its own DEIR and ignore this fact with a statement of overriding considerations.

9-35

The only mitigation measure proposed is to rely upon the development review process to ensure that the policies of the Community Plan’s Mobility Element are adhered to by each development. Stronger measures need to be mandated by Ordinance to the plan to cap the number of trips that can be generated by developments in Hollywood, (potentially with trip caps by sub-area), and coupled with requirements for developers to subsidize transit passes and encourage other transportation modes such as cycling as noted under the LAND USE comments. The policies in the plan intended to enhance walkability and improve many streets with parkways is commendable, but without tangible, identified, dedicated and enduring financing mechanisms the plan will fail.

9-36

Further analysis and mitigation should be required.

Until such time as the nexus study recommended in the DEIR is completed and there is a funding mechanism in place for transportation improvements in Hollywood, the level of development should be curtailed. We cannot rely on the development review process to extract mitigations from individual developments that will be adequate to address the bigger picture congestion issues in Hollywood. A regional approach to the transportation problems resulting from the Proposed Hollywood Community Plan is required. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and would include mitigation measures for all impacted street segments and intersections and a fee structure by which all new development would be required to pay its fair share of fees to mitigate potential traffic impacts.

9-37

We are concerned by what is best an unclear, and at worst incorrect descriptions of several streets in the HHWNC area. This creates concern that proposed mitigations are based on incorrect assumptions. For example, in the DEIR:

9-38

- Barham Boulevard is described as having “two lanes in each direction with on-street parking on both sides of the street, with length of time restrictions in many blocks.” This is inaccurate.

9-39



- Hollywood Boulevard is described as having two lanes in each direction. This is accurate during only during peak commuting hours when the parking land is converted to a second travel lane in each direction. 9-40
- Fountain Avenue is described as having metered parking on both sides of the street between Fairfax Boulevard and La Brea Avenue. This is incorrect. 9-41

We also maintain that Franklin Avenue between La Brea Avenue and Sierra Bonita, and Gardner Street between Fountain Avenue and Franklin Avenue be downgraded from Secondary Highways to local streets. 9-42

A final issue of concern with respect to the traffic impacts of the Proposed Hollywood Plan is increase in “cut through” commuter traffic. The City of Los Angeles has installed peak turn restrictions onto certain streets in the HHWNC area. This is a barely adequate mitigation measure as the signage is rarely enforced. However, it is one that we recommend be further studied. 9-43

Additional comment:

The Community Plan Update seeks to amend a portion of the Transportation Element of the General Plan, the Bike Plan, to include a number of bike lanes, bike routes or bicycle boulevards to then be studied by the Bike Plan. As the Community Plan Update is a General Plan Amendment, and amendments to the Transportation Element would be General Plan Amendments, any amendment to the Transportation Element should be done as part of the General Plan Amendment process with the Community Plan Update. 9-44

If the Community Plan Update does not analyze the potential impacts of the proposed bike lanes, bike routes or bicycle boulevards, it must clearly explain under what circumstances those bike lanes, bike routes or bicycle boulevards would be analyzed (i.e. during environmental review of site-specific projects, or through other means discussed in the Bike Plan). 9-45

It is recommended that the following policies and should be mandated:

Policy LU.3.6-The siting of parking lots next to sidewalks which carry high volumes of pedestrian traffic is PROHIBITED.

Policy LU.3.13-It is MANDATED that there must be an improvement to pedestrian access to large entertainment venues, such as the Hollywood Bowl. 9-46

Program M.1.87.2-There MUST BE an implementation of Neighborhood Traffic Management plans along canyon routes and associated streets across the Hollywood Hills, and flat land, including the neighborhoods generally located between the following streets:

- Franklin Avenue and Hollywood Boulevard
- Sunset and Hollywood Boulevards





- Laurel and Nichols Canyons
- Sunset and Santa Monica Boulevards
- Franklin Avenue and Mulholland Drive

9-46  
Cont.

### **AIR QUALITY**

The document states: Implementation of the Proposed Plan would result in substantial criteria pollutant emissions,” “...and could expose sensitive receptors to substantial pollution concentrations...”...”Implementation of the Proposed Plan would result in increased GHG emissions that would contribute significantly to global climate change.”

9-47

#### **Assessment**

The document’s proposed mitigations appear to rely solely on policies rather than on mandates. The policies of the proposed plan do not require the City to meet any standards, and only address private development.

#### **Further analysis and mitigation should be required.**

The City should seek to implement its own climate policy, ClimateLA. The plan proposes to increase density adjacent to the 101 Freeway and other major thoroughfares, resulting in exposure of sensitive receptors to substantial pollutant concentrations.

9-48

The City must conduct a nexus study to determine the impact of future development on air quality in the Proposed Hollywood Community Plan area, and develop a community-wide mitigation plan funded by impact fees. This cannot be a policy of the Proposed Community Plan but mandated. The nexus study must be completed within 12 months of the adoption of the Community Plan Update and include mitigation measures for all new development and a fee structure by which all new development would be required to pay its fair share of fees to mitigate air quality impacts.

9-49

### **NOISE**

It is clear that increased density results in increased noise, much of which is not addressed in the document.

9-50

#### **Assessment:**

The Plan states that Construction Noise and Vibration impacts that would occur are uncertain at this time and impossible to predict and would have to be evaluated further under subsequent CEQA actions. This response is obviously inadequate. It is not reasonable to shift the responsibility and impacts from the known design of the proposed plan and land use developments in the proposed plan onto future projects and not take into account cumulative impacts from multiple projects.

9-51



Further analysis and mitigation should be required.

New mitigations need to be prepared for all of the planned added development occurring simultaneously. For example, the Final EIR should require staggered times of construction on projects within a certain radius of one another and limits on the number of projects that can proceed within the radius in a given amount of time.

9-52

The HHWNC Board reviewed this correspondence on May 26, 2011. Eleven of the Board members voted to accept and approve the Committee's comments and recommendations. One member abstained.

We appreciate the opportunity to comment on the DEIR. We encourage all of the stakeholders in the HHWNC area, including individual homeowners associations and business groups, to comment on the proposed land use and zone changes included in the proposed Plan for the sub-areas in or near their particular areas. We anticipate that HHWNC will be submitting further comments on the Hollywood Community Plan itself as it moves through the Area Planning Commission, Planning Commission and City Council. As noted above, many of our concerns have to do with increased density and transitions between residential and non-residential uses, as well as the unmitigated impacts associated with the levels of development contemplated in the Plan.

Sincerely,

Anastasia Mann  
President  
Hollywood Hills West Neighborhood Council

cc: Council President Eric Garcetti, CD 13  
Council Member Tom LaBonge, CD 4  
Council Member Paul Koretz, CD 5  
Kate Henning, CD 13  
Renee Weitzer, CD 4  
Christopher Koontz, CD 5  
Michael LoGrande, Director of Planning  
Mary Richards, Department of Planning  
Kevin Keller, Department of Planning

# Project Saving Grace

2011

Letter 10

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RE: Case No. EIR-2005-5158EIR, State Clearinghouse No. 2002041009, Council Districts: 4, 5, 13  
Community Plan Area: Hollywood, Project Address: Hollywood Community

Dear Ms. Hewawitharana:

I am writing with a few concerns about the Plan that effects our area which we lovingly call Yucca Village. This area covers Hollywood Blvd North to Franklin Avenue South, Cahuenga Blvd West and Highland Avenue East. In this area we are currently 400 residential parking spaces short. There are a number of buildings in our area that either have no parking or very limited parking causing many residents to park on the street. When you add the valet companies that don't have parking lots and the businesses that don't have places for all of their employees to park, you are talking about a massive safety and environmental issue.

Every day from the hours of 5:00 p.m. 8:00 p.m. there are cars that drive in circles looking for a place to park, which in itself adds more carbon dioxide to the area as they are burning more fuel in order to park their vehicle. Also, while on this daily search for parking, the drivers are often going slow in order to find a parking space which aggravates other drivers who eventually go around them only to screech on their brakes to avoid an accident.

Then there is Franklin Avenue, which the city considers a secondary highway. I find that title in itself ridiculous as it is on one lane going in each direction and there are cars parked on both sides of the street. Currently the DASH bus also runs through this section of Franklin and if there ever were an accident, it would tie up traffic all the way back to Cahuenga.

Not only will traffic get built up on Cahuenga, but due to the fact that cars will now have to turn down the side streets, Wilcox Avenue, Whitley Avenue, Cherokee Avenue and Las Palmas Avenue, it will not only create a traffic nightmare, but will make it harder for pedestrians to safely cross the street as well as hold up an emergency vehicle that needs to go through as these streets are all one lane in either direction streets. Although an accident is a possibility, I have seen such traffic backups in years past, due to work on Franklin by the DWP.

With that amount of traffic coming through our neighborhood, it really increases the amount of pollutants in the air on top of the ones we get from being so close to the 101 freeway. Although wanting to build more in the area may sound great if the area was empty, but it is not, and building on top of new mixed use buildings which are at 50% rental at best is not a well thought out plan.

I am just asking that city make a return trip to the area and actually stay longer than 10 minutes and go over the area that it wants to change so much. On any given day you will see the traffic that residents have to deal with as well as the loud noise from vehicles as valets speed around the area looking for places to park their cars. I would love if anyone from the city would come to this area on a Friday or Saturday after 7:00 p.m. and stick around for about 2 hours so that you can understand the impact on our fragile environment that we are already dealing with not to mention what we may have to deal with if the city doesn't bother to take a second look at what it's proposing.

Thank you for your time,

Robin Moreno

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Los Angeles, CA 90028  
(323) 957 – 6487  
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[www.projectsavinggrace.net](http://www.projectsavinggrace.net)

Helping to Build A Strong Community One Road at a Time

10-1

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Susan Swan  
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Erik Sanjurjo  
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Charles Suhayda  
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CITY OF LOS ANGELES



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JUN 08 2011

ENVIRONMENTAL  
IMPACT

23 May 2011

Michael J LoGrande  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012

Re: Hollywood Community Plan Update  
ENV-2005-2158-EIR  
CPC no. 97-0043  
State Clearinghouse No. 2002041009

The Board of Directors of the Hollywood United Neighborhood Council comment upon the Draft Program Environmental Impact Report on the proposed Hollywood Community Plan Update as follows. [Underlined references are to the published DEIR] [This letter was approved unanimously by the Board at its regular meeting on 16 May 2011.]

1. We wish to commend and thank Mary Richardson and Kevin Keller of the City Planning Department for their work on this intimidatingly large project. The format is handsome and readable. Their presentation to our Council was excellently organized. 11-1
2. We wish to note that this revision to the Hollywood Community plan is by law years overdue. The time for considering it allotted to us-----60 days--- --is very short when compared with the time that the Planning Department has taken to prepare it, replete with numerous postponements, often six months in length.
3. We have found many reasons to object to the Plan. Prime among them is the overloading of already inadequate Hollywood infrastructure. 11-2
  - Traffic: "...the Proposed Plan would result in an increase in trips of nearly 55% as compared to Existing (2005) conditions." Page 4.5-29 As expressed, the data supporting this figure are six years old. However, traffic in Hollywood increases annually. At present Franklin Avenue, for example, has severe gridlock morning and evening.

The EIR promises that there will "result in an unavoidable significant adverse transportation impact." Page 4.5-30 The lost time, annoyance, increase in smog and dust resulting from a 55% increase in traffic are daunting to contemplate. The Plan offers no relief from this impact.

11-2  
cont.

- Utilities: Most of Hollywood's sewers and water mains are almost a century old. Notable lately in the news have been explosions of water mains in other parts of the city, attributed by the DWP to aging mains. With an increase in pressure to obtain more water for the new dwellings and enterprises projected for Hollywood such failures can be expected here. The EIR is silent on the impact on sewers in the Hollywood area, only remarking that the Hyperion plant on the seacoast can accommodate the projected increases. Electrical and fuel gas service lines will be overloaded as well. It is true that all these pipes, mains and cables can be replaced with larger, adequate lines. The cost will be very great, and it will fall upon the taxpayers and ratepayers, not the developers involved in this growth.

11-3

A further detailing of objections is redundant. The operant philosophy underlying the Hollywood Community Plan is mistaken. We challenge what we feel is an unexamined assumption in the Draft EIR and the Plan itself----- namely, that the Hollywood area should be forced to accommodate an increase in population density. Many impacts that seem "unavoidable" are in fact avoidable, if we simply choose to delay further population growth (other than natural increase from current residents, of course). This should not seem like a radical idea. Additionally, Hollywood has already met its population goals.

11-4

We do not believe the report adequately demonstrates any evidence that greater population density is either desired or necessary. Recent studies have indicated that previous population increase projections have not taken place.

Our public officials, Federal, State and City are all currently engaged in a desperate search for funds to maintain the present social and material facets of our country, state and city. This is not the time for projecting increased loads on the environment and infrastructure. Additionally, we challenge the idea that our HUNC area, and the larger Hollywood area in general, can be designed as a discrete piece, without regard to the other changes planned in our City. We challenge the impacts of putting more projects in "Redevelopment Areas," since these do not increase the tax base. Hollywood is already resurgent, no longer subject to large areas of "blight."

And we challenge the notion that increased density, on the model of New York City is appropriate or desirable for Hollywood, where our climate and our customs and traditions are different to other cities'.

Please direct your earnest efforts toward changing the plans contemplated for Hollywood.



SUSAN SWAN, President  
Hollywood United N C



DAVID H SCHLESINGER,  
PLUM Committee, HUNC

Cc: Mayor Antonio Villaraigosa

Councilmembers:

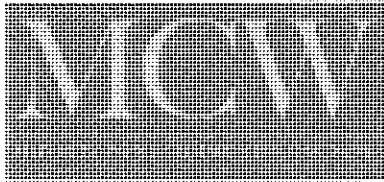
Dist 1 Ed Reyes  
Dist 2 Paul Krekorian  
Dist 3 Dennis P Zine  
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Dist 5 Paul Koretz  
Dist 6 Tony Cardenas  
Dist 7 Richard Alarcon  
Dist 8 Bernard Parks  
Dist 9 Jan Perry  
Dist 10 Herb J Wesson jr  
Dist 12 Bill Rosendahl  
Dist 13 Greig Smith  
Dist 14 Eric Garcetti  
Dist 15 Janice Hahn

Beachwood Canyon  
Neighborhood Association

The Oaks Homeowners  
Association

Hollywoodland Homeowners  
Association

The Hollywood Dell  
Homeowners Asso



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ENVIRONMENTAL

543 N. Fairfax Avenue, Suite 106  
Los Angeles, CA 90036  
May 20, 2011

Srimal Hewawithrana  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012

**RE: Hollywood Community Plan (HCP) and Draft Environmental Impact Report (DEIR): Case Numbers: ENV-2005-2158-EIR, CPC no. 97-0043**

Dear Srimal Hewawithrana:

At its meeting of Tuesday, May 10, 2011, the Mid City West Community Council (MCWCC) Board of Directors decided, by a vote of 32 yes, 0 no, and 2 abstentions, to submit written comments reflected in this letter, developed by its Planning and Land Use Committee's (PLUC's) Hollywood Community Plan-Draft Environmental Impact Report Working Group, as part of the public comment period.

12-1

For purposes of discussion, this letter will first address issues of note to our neighborhood council, relating to the content of the Hollywood Community Plan itself, and then address issues of note relating to the Draft Environmental Impact Report.

In regards to the Hollywood Community Plan, MCWCC wants to submit the following comments:

12-2

1. Of the General Plan Framework's Guiding Principles listed in Chapter 1, page 20 of the Plan, Mid City West in particular supports the goals to:
  - a. Conserve existing residential neighborhoods;
  - b. Create more small parks, pedestrian districts, and public plazas; and
  - c. Improve mobility and access.

2. Mid City West has concerns regarding Chapter Two, page 48, Table 2-1, Adjusted Projected Population, Housing, and Employment. Concerns have been expressed by some in the planning community that these population estimates are not accurate, and that the Planning Department should integrate the latest Census data into the Plan. Specifically, Dick Platkin, a former City of Los Angeles planner, in a presentation to PlanCheckNC on April 9, 2011, stated that:

12-3

“One new development which favors community-directed plan updates is that the new 2010 census data reveals that nearly all of Los Angeles's Community Plan and Specific Plan areas have had stable or declining population during the last 10-20 years. The formal planning rationale for up-planning and up-zoning, as presented in the legally adopted General Plan Framework Element is a clear demonstration that population and housing...have increased to the point that they have surpassed zoned capacity.

- Stable and declining populations, however, reveal exactly the opposite, that there are no capacity deficiencies with existing zoning. It is fully adequate to meet the needs of the city's population." 12-3 cont.
3. MCW strongly supports Chapter 3 (Land Use Plan), Policy LU.1.19, on page 62, to "[s]upport design standards to achieve transition in scale where neighborhoods planned for multifamily residential uses abut neighborhoods planned for single family residential uses (Map 19)," as it would rezone Hayworth and a few blocks west of Fairfax to install regulations developed in an Interim Control Ordinance (ICO) for an area near there, which is very similar to this new area. 12-4
  4. We have concerns about Chapter 3, Policy LU.1.25.1 (page 64) and 1.26.1 (page 68); both would directly affect our neighborhood. Policy LU.1.25.1 would "[p]repare an Alley Maintenance Plan for the alleys located behind the commercial uses along Melrose Avenue between Fairfax and La Brea Avenues," and Policy LU.1.26.1 would "[c]reate design guidelines for commercial uses along Melrose Avenue between Fairfax and La Brea Avenues (Map 21) to maintain and improve the pedestrian-oriented scale and character." In particular, one of the questions we have about LU.1.26.1 is why does this only go from Fairfax to La Brea? Some feel that this should stretch as far west as Orlando. 12-5
  5. MCW wants to note that there is difference of opinion within our community to language in Chapter 3, page 71, regarding "hybrid industrial zones (Map 30)" that "allow a mixture of industrial uses with residential or commercial uses along the borders of the Media District, to provide a transition between industrial uses and surrounding neighborhoods." 12-6
  6. Regarding Chapter 3, Policy LU.2.13, which would "[u]tilize higher Floor Area Ratios to incentivize mixed-use development around transit nodes and along commercial corridors served by the Metro Rail, Metro Rapid bus or 24-hour buslines (Map 28)," Mid City West is specifically concerned about the effects that this would have on Subparcel 38:A, described in the "Matrix of Existing Planned and Proposed Land Use for the Hollywood Community Plan" as "[e]ast and west sides of La Cienega betw. Sta. Monica and Melrose Place generally". 12-7
- For this subparcel, Mid City West supports appropriate transition between buildings on La Cienega and buildings behind on the east and west side. Mid City West also supports a maximum height district of 50 feet in this subparcel.
7. Similarly to point 5, Mid City West notes that there is a difference of opinion in our community regarding Chapter 3, Policy LU.2.28 and LU.28.1. LU.2.28 is designed to "[p]rovide incentives for mixed-use development which incorporates and maintains targeted uses in specific hybrid industrial zones and industrial opportunity areas," whereas LU.28.1 "[e]stablish[es] new zoning districts that encourage a mix of industrial uses with commercial or residential uses around the perimeter of industrial districts, where appropriate." Some in our community are supporting the preservation of industrial land; they are concerned that a mixed-used development with both industrial and residential uses would limit the types of industrial uses available. Some support the language because they believe that hybrid industrial zoning will preserve industrial uses. 12-8
  8. Regarding Chapter 3, Policy LU.3.1, which seeks to "[w]iden sidewalks to a minimum of 15 feet, or maintain existing sidewalk widths of 15 feet, along major and secondary highways with high levels of pedestrian traffic[, and s]upport the adoption of Modified Street Standards (Map 32) for the sake of preserving sidewalks which are already wide (15 feet or wider) and widening sidewalks which are narrow (less than 15 feet)," Mid City West: 12-9
    - a. supports the walkability and pedestrian friendly emphasis of this policy;
    - b. supports the downgrading of Martel, Willoughby, and Vista from a secondary highway; and
    - c. does not support the widening of Fairfax.



9. Mid City West supports Chapter 3, Policy LU.3.18.1, which seeks to “[d]evelop Streetscape Plans (Maps 33 and 34) for...selected street segments,” particularly La Brea Avenue between Franklin and Rosewood Avenues. 12-10
10. Mid City West supports Chapter 3, Goal LU.4, “[i]mprove open space, parks and public spaces.” Specifically, Mid City West encourages looking for more opportunities for open space within our area, and in projects that are built.
11. In Chapter 4, Mobility Plan, some in the Mid City West area have expressed concern about the possible effects of Policy M.1.8, to “[i]mplement parking restrictions to provide additional capacity in periods of peak traffic, where appropriate. Discourage peak hour parking restrictions on streets with high volumes of bicyclists and older residential neighborhoods which have deficits of off-street parking.”
12. Mid City West supports Chapter 4, Policy M.1.12, to “[s]tudy the use of one-way streets to ease traffic congestion.”
13. Mid City West recommends that the bicycle-related policies described in Chapter 4, particularly Policies M.1.44 through M.1.48, relating to amending the Bicycle Plan to designate certain streets as Class III bike routes; connecting existing and proposed bike paths, lanes and routes in the Hollywood Community Plan to those in other areas; implementing public right of way improvements on Fairfax Avenue between Willoughby Avenue and Melrose Avenue; and amending the Bicycle Plan to include various routes as study corridors for potential bike lanes, routes or boulevards, respectively, need to be made consistent with the Bicycle Plan, as the Bicycle Plan came out well after the Hollywood Community Plan had been prepared back in July of 2010. 12-11
14. Regarding Chapter 4, Program M.1.87.1, which provides for a “[s]tudy [of] cut-through traffic in the area bounded by Hollywood Boulevard on the north, La Brea Avenue on the east, Fountain Avenue on the south, Fairfax Avenue on the west, and the area bounded by Hollywood Boulevard on the north, Fairfax Avenue on the east, Sunset Boulevard on the south, Laurel Canyon Boulevard on the west, and prepar[ation of] a neighborhood traffic management plan, pending results of study,” Mid City West feels that the study needs to incorporate the area that is south of what is listed here, namely the Mid City West area. 12-12
15. In regards to Chapter 5, dealing with Community Facilities and Infrastructure, Mid City West has the following comments: 12-13
  - a. Mid City West wants to encourage maintaining the current level of fire stations and staffing; and
  - b. Mid City West feels that the City should do the required infrastructure report to have a better assessment and monitoring of the various resources expressed in this section, namely the public facilities and services such as police, fire and emergency services, libraries, schools, parks; and the infrastructure including water, water supply infrastructure, wastewater, solid waste, stormwater, and energy; and
  - c. if the City decides to upzone, it should have the infrastructure in place to sustain the upzoning.

Next, Mid City West offers the following written comments related to the Draft Environmental Impact Report (DEIR) of the Hollywood Community Plan:

1. Mid City West would like to highlight the paragraph in Section 2, Summary, page 2-3, which reads, in part:

12-14

“Although the Proposed Plan would not potentially create land use conflicts, it could initiate changes that could result in impacts to the character of some neighborhoods due to changes in the intensity of residential land uses from lower density residential land uses to higher density residential land uses. The Proposed Plan also includes a few areas being converted from non-residential to residential and vice versa.”

Mid City West believes that the above paragraph does indicate that our neighborhoods could be affected by this Proposed Plan, and that if the Plan is to go forward, that significant efforts should be made to minimize these impacts.

2. Mid City West is concerned about part of the next paragraph in Section 2, page 2-3, which reads:

12-15

“The Hollywood Community Plan Update is undertaken to accomplish several purposes. As of 2005, there were approximately 224,426 persons living in the Plan area. Based on the SCAG estimates, it is anticipated that, by 2030, there will be 244,602 persons, or 20,176 more people living in the same area.”

The issue that Mid City West has with this paragraph is that the SCAG estimates are not based on the 2010 Census, which was described in Hollywood Community Plan Comment 2, above; Mid City West also notes that there was a building boom prior to the Census being taken.

3. Section 4.0, Land Use, page 4.1-5, part of the first paragraph is also of concern to Mid City West:

12-16

“As part of redirecting growth, the Proposed Plan includes removing and/or revising development limitations on commercial zones and multi-family residential zones that were imposed during the previous Update in 1988.”

Mid City West believes that some of these development limitations were imposed for a reason, at the time, and therefore, if the Plan is to go forward, that adequate outreach will be done to notify the residents and businesses in the affected areas of these changes.

4. Mid City West notes that, in addition to the comments on the La Brea Willoughby block and the rezone to “hybrid residential”, the La Brea Willoughby Coalition, part of whose operating area is located within the Mid City West area, is submitting public comment on the areas in and affecting their neighborhood, namely the following subparcels:

12-17

- a. 39.3, described as the “[e]astern half of block generally south of Romaine, east of Formosa, north of Willoughby, west of La Brea”;
- b. 39.4, described as “[b]oth sides of La Brea, generally between Romaine and Willoughby, extending west to include most of the eastern half of the block s. of Romaine, e. of Formosa, n. of Willoughby, w. of La Brea”; and
- c. 40, which is described as “[s]outh of Santa Monica, east of La Brea, north of Willoughby, west of the Hollywood Signage District along west side of Highland,” to the Department of City Planning.

5. Mid City West supports the preservation of the existing housing stock of the most affordable housing option, which is to say, instead of tearing down existing housing and building SB 1818 housing with fewer affordable housing units, so the number of affordable housing units decreases, Mid City West supports the preservation of the existing housing stock. 12-18

6. Regarding Section 4.3, Public Services, Mid City West would like to make the following general observations: 12-19

- a. there are expected significant impacts in several different areas, and often times, significant mitigation measures associated with those impacts, and there is some question regarding whether the City has, or will have, the funds to all of the mitigation; and
- b. we have no control over the funding levels of the various City departments.

7. In Section 4.5, Transportation, page 4.5-15, the Hollywood/West Hollywood DASH route is described in significant detail. Mid City West would like to note the following: 12-20

- a. in the period of time since this Environmental Impact Report was prepared, the Hollywood/West Hollywood DASH has been eliminated as part of a recent round of budget cuts; and
- b. we do not control the level of services provided by the Metropolitan Transportation Authority (MTA), or how the money is allocated among various elements of the mass transit system; and
- c. some in our community believe that there is no basis for their study, because the infrastructure study has not been done.

8. Also in Section 4.5, on page 4.5-30, Mid City West notes the following paragraph, indicating the “significant adverse transportation impact” from the Plan: 12-21

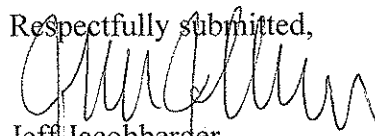
“In summary, the Proposed Plan compared to 2005 conditions would result significant negative impact. The percentage of links [--the term for intersections--]at LOS[--Level of Service--]E or F would increase significantly and the weighted V/C ratio[--Volume/Capacity ratio--]would increase from 0.939 to 1.000.”

Mid City West is concerned about this situation, as it is with most issues which can affect traffic in our area.

9. Regarding the final Sections 4.6-4.10—Air Quality, Noise, Geology, Cultural Resources, and Safety Risk, respectively—Mid City West reiterates its concern that there are lots of mitigation measures offered to address these impacts, and its concern that there will be resources available to provide these mitigation measures once the Proposed Plan is implemented. 12-22

Thank you very much for considering the Mid City West Community Council’s written comments regarding the Hollywood Community Plan (HCP) and the Draft Environmental Impact Report (DEIR) on the Hollywood Community Plan.

Respectfully submitted,



Jeff Jacobberger  
MCWCC Chair



Charles Lindenblatt  
MCWCC PLUC HCP-DEIR Working Group Chair



Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

# RE: Hollywood Community Plan Update

3 messages

Cindy Cleghorn <cindy@cmprintmail.com>

Wed, Jun 1, 2011 at 6:03 PM

To: Srimal.Hewawitharana@lacity.org

The following is submitted for the Hollywood Community Plan official FEIR file. Thank you,  
Cindy

RE: EIR-2005-5158-EIR / State Clearinghouse Number: 2002041009  
Comments on FEIR for Hollywood Community Plan Update

Dear DEIR Administrator Hewawitharana,

The Hollywood Community Plan Update will be the first to be completed. It will set a precedent for all Community Plans. It is important for the city to be "extra thorough" | 13-1

This community plan needs to include 2010 Census data. The 2000 data is too old, outdated and inaccurate. |

This new community plan needs to include an infrastructure plan. | 13-2

This new community plan needs to include a design plan. | 13-3

Do not increase zoning in any areas. The infrastructure and overall ability to function are being impacted by poor planning. | 13-4

Submitted by:

Cindy Cleghorn  
10034 Commerce Avenue  
Tujunga  
818-353-7135  
Secretary, Sunland-Tujunga Neighborhood Council / Land Use Committee Member

Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

Thu, Jun 2, 2011 at 8:49 AM

To: Cindy Cleghorn <cindy@cmprintmail.com>

Dear Ms. Cleghorn,

Thank you for your comments on the Hollywood Community Plan Draft EIR. We will be responding to all comments received during the review period, in the Final EIR.

Sincerely,

Srimal P. Hewawitharana  
Environmental Specialist II

[Quoted text hidden]



# Cahuenga Pass Property Owners Association

*Representing the Cahuenga Pass since 1952*

June 1, 2011

Ms. Srimal Hewawitharana, Environmental Review Coordinator, EIR unit  
City of Los Angeles, Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles CA 90012

RE: Hollywood Community Plan  
Draft Environmental Impact Report  
EIR Case No. 2005-2158-EIR, Clearinghouse Number 2002041009

Dear Ms. Hewawitharana:

For over fifty years, the Cahuenga Pass Property Owners' Association (CPPOA) has represented the interests of owners and residents of both commercial and residential properties in the Hollywood Hills west of the 101 Freeway, north of Mulholland Drive, and south of Vineland Avenue. There are approximately 1500 homes and businesses in our hillside community. We submit these remarks to become part of the official record as well as part of the FEIR. Unless otherwise stated, please consider statements as well as questions to be in need of an appropriate response. Our concerns and questions are as follows:

The Cahuenga Pass continues to be a heavily traveled region, notable because it provides one of the few passages from the San Fernando Valley into Los Angeles. Because of its unique nature, streets such as Barham Boulevard and Cahuenga Boulevard West quickly become alternative routes for commuters. When these larger boulevards reach capacity, neighborhood streets become the next alternative for desperate motorists. The DEIR suggests increased density along Barham Boulevard, despite its reputation as an already notoriously congested corridor. Given other suggested developments in the area that will also increase automotive trips, such as the NBC/Universal Evolution Plan and the MTA Universal Station Project, why are the parcels along Barham Boulevard being considered for increased density from 0.5 to 1 FAR to 1.5 to 1 FAR? Does the traffic analysis include anticipated augmented automobile trips to and from these locations as a result of this increase? Do the traffic estimates take into account these other two projects (NBC/Universal Evolution Plan and the MTA Universal Station Project)? If not, why?

14-1

14-2

14-3

In the DEIR, it is suggested that Cahuenga Boulevard West runs from Franklin Boulevard to Barham Boulevard. These are actually two different streets. South of Odin, the street is known simply as Cahuenga Boulevard; it turns into Cahuenga Boulevard East north of Odin. North of Odin, on the west side of the freeway, is Cahuenga Boulevard West, which branches off Highland

14-4

Avenue as it terminates into the 101 Freeway. Why does the DEIR conflate Cahuenga Boulevard West and Cahuenga Boulevard despite their distinctively different characteristics?

14-4  
cont.

Cahuenga Boulevard West is suggested as a Major Highway – Class II. As noted in the DEIR, this generally includes 12’ wide sidewalks, 4 full-time through lanes, 2 part-time parking lanes and a median or left turn lane. While this may characterize Cahuenga Boulevard, it fails to recognize that Cahuenga Boulevard West actually has limited pedestrian access, 3 full-time through lanes in some areas, limited or non-existent parking, and no median or left turn lane for significant sections of its length. Might it be more prudent to consider reclassifying this roadway to reflect its true character and recognize its limited capacity to carry additional automobile traffic unless significant infrastructure improvements are made?

14-5

14-6

Why is the speed limit not included in the description of Cahuenga Boulevard West?

14-7

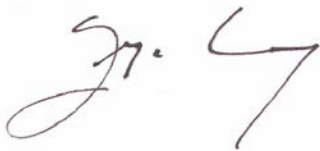
Why is the sign district in Hollywood not part of the environmental analysis? Proliferation of signage has clear impacts on both the quality of life and appearance of a community, and it should also be considered in the analysis.

14-8

As President of the Cahuenga Pass Property Owners’ Association, I thank you for your time. Our organization welcomes the opportunity to work with you and the City of Los Angeles to create a socially, culturally, and ecologically sustainable vision for Hollywood.

14-9

Respectfully,



Bryce C. Lowery  
President  
Cahuenga Pass Property Owners’ Association

cc: Michael LoGrande, Director, City of Los Angeles Department of Planning

City of Los Angeles Councilmember Tom LaBonge, 4th District  
Renee Weitzer

Los Angeles City Councilmember Ed Reyes  
Los Angeles City Councilmember Paul Krekorian  
Los Angeles City Councilmember Dennis P. Zine  
Los Angeles City Councilmember Paul Koretz  
Los Angeles City Councilmember Tony Cardenas  
Los Angeles City Councilmember Richard Alarcon  
Los Angeles City Councilmember Bernard Parks  
Los Angeles City Councilmember Jan Perry  
Los Angeles City Councilmember Herb J. Wesson, Jr.  
Los Angeles City Councilmember Bill Rosendahl

Los Angeles City Councilmember Greig Smith  
Los Angeles City Councilmember Eric Garcetti  
Los Angeles City Councilmember Jose Huizar  
Los Angeles City Councilmember Janice Hahn  
Mayor Antonio Villaraigosa

June 1, 2011

James O'Sullivan  
FixTheCity

Comments on DEIR, Hollywood Community Plan Update

Srimal Hewawitharana,  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
[Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

Re: Hollywood Community Plan Update  
Case No. EIR-2005-5158-EIR  
State Clearinghouse Number: 2002041009

Section 1.1 Background of the Introduction to the Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update states that the update builds on the 1996 General Plan Framework Element and further states that the proposed Hollywood Community Plan incorporates principles set forth in the General Plan Framework, an element of the City's General Plan that was implemented to guide the update of other General Plan elements in 1995.

***IN THE ABSENCE OF AN EXPLICIT INCLUSION OF GENERAL PLAN POLICIES AND REQUIRED MITIGATIONS, IT IS ASSUMED THE DEIR INCORPORATES ALL POLICIES AND REQUIRED CEQA MITIGATIONS IMPLEMENTED AS PART OF THE GENERAL PLAN EIR PROCESS. IF THIS IS NOT THE CASE, THIS MUST BE DISCLOSED.***



15-1

Section 1.2 Authorization and Focus:

The purpose of this EIR is to provide a document that will inform the Department of City Planning, the City Planning Commission, the City Council, the Mayor, and other reviewing agencies as well as the general public of the environmental effects of the Proposed Plan. An EIR does not determine whether a project will be approved. According to Section 15121 of the CEQA Guidelines, its purpose is to identify all potentially significant effects of a project on the physical environment, to determine the extent to which those effects could be reduced or avoided, and to identify and evaluate feasible alternatives to the project. When an EIR determines that a project could cause significant impacts on the physical environment, those agencies with permit authority over the project are required to make one or more of the following findings before the project can be approved:

1. The project has been altered to avoid or substantially lessen significant impacts identified in the Final EIR.



2. The responsibility to carry out mitigation is under the jurisdiction of another agency.
3. Specific social, economic or other concerns render the mitigation measures or alternatives to the project infeasible.

According to the CEQA Guidelines (Section 15151), the EIR need not be exhaustive in its analyses of a project, but should analyze important issues to a sufficient degree that permitting and approving agencies can make informed decisions. Disagreements between experts, for example, do not render an EIR inadequate, but the major points of such disagreements should be summarized in the EIR.

15-1  
cont.

***HOW DOES THE PLAN CORRELATE THE TYPE, AMOUNT AND LOCATION OF DEVELOPMENT WITH THE AVAILABILITY OF CITY-WIDE AND REGIONAL INFRASTRUCTURE?***

15-2

***WHAT TRIGGER LEVELS DID THE CITY USE TO DETERMINE IF THE PLAN WOULD CAUSE ANY INFRASTRUCTURE ELEMENT IN THE CITY TO BE THREATENED? PLEASE LIST IN THE FEIR.***

15-3

***“WHAT MONITORING DATA, CONSOLIDATED DATA OR DATA ANALYSIS WAS USED TO MAKE THE DETERMINATION OF EACH ELEMENT OF THE BASELINE CONDITION OF SCHOOLS, PARKS, LIBRARIES, POLICE, FIRE, TRANSPORTATION?”***

15-4

***DOES THE HOLLYWOOD PLAN REQUIRE THE ABANDONMENT OF GENERAL PLAN REQUIRED MITIGATIONS AND POLICIES?***

15-5

***PLEASE IDENTIFY WHICH MITIGATIONS AND POLICIES ARE BEING ABANDONED.***

15-6

***WHAT TRIGGER LEVELS WERE USED TO DETERMINE IF ANY INFRASTRUCTURE ELEMENT IN THE CITY TO BE THREATENED?***

15-7

***“WHAT MONITORING DATA, CONSOLIDATED DATA OR DATA ANALYSIS WAS USED TO MAKE THE DETERMINATION OF EACH ELEMENT OF THE BASELINE CONDITION OF SCHOOLS, PARKS, LIBRARIES, POLICE, FIRE, TRANSPORTATION?”***

15-8

## CEQA MITIGATION POLICES

The DEIR for the Hollywood Community Plan Update states that based on its Initial Study, it was determined that implementation of the proposed Community Plan Update has the potential to result in significant adverse impacts to the following issue areas:

1. Land Use
2. Population, Employment and Housing
3. Public Services
4. Utilities
5. Transportation/Circulation

6. Air Quality
7. Noise
8. Geology
9. Cultural/Archaeological Resources
10. Safety/Risk of Upset

***DID THE INITIAL STUDY USE INFORMATION GATHERED AND ANALYZED PER CHAPTER 9 OF THE FRAMEWORK ELEMENT AND THE MONITORING PROGRAM (POLICY 3.3.2)?***

15-9

***HAVE YOU STUDIED THE IMPACTS OF THE INFRASTRUCTURE ASSUMPTIONS IN THE DEIR ON THE SURROUNDING COMMUNITY PLAN AREAS.***

15-10

Chapter 9 of the Framework Element (Infrastructure and Public Services) states that the goals, objectives and policies found within this section address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include:

15-11

1. [Wastewater](#)
2. [Stormwater](#)
3. [Water](#)
4. [Solid Waste](#)
5. [Police](#)
6. [Fire](#)
7. [Libraries](#)
8. [Parks](#)
9. [Power](#)
10. [Schools](#)
11. [Telecommunications](#)
12. [Street Lighting](#)
13. [Urban Forest](#)

‘Consequently, the linkage between future growth and services will occur through the implementation of a monitoring program that provides information regarding "real" demands and service levels in order to guide public decisions regarding infrastructure and service investments. Successful application of this system would mitigate the need to restrict development to ensure adequate level of service.’

***IS THIS PLAN INTENDED TO BE CONSISTENT WITH THE GENERAL PLAN POLICIES AND MITIGATIONS?***

FIRE

15-12

In addition to the Fire Protection and Prevention Plan and the Safety Plan, the

proposed Hollywood Community Plan incorporates programs and policies that help mitigate community-specific fire and emergency response issues. In addition to these programs and policies, the following **mitigation policies** are proposed:

15-12  
cont.

1. Identify areas of the Hollywood CPA with deficient fire protection facilities and/or services and prioritize the order in which the areas should be upgraded to established fire protection standards to ensure acceptable fire protection at all times.

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?***

15-13

2. Continue to require, in coordination with the Fire Department, adequate fire service capacity prior to the approval of proposed developments in areas currently located outside of the service areas or capability of existing city fire stations.

15-14

***WHAT PRECISELY DOES “ADEQUATE” MEAN?***

***WHAT IS THAT “ADEQUATE” SERVICE AND HOW WAS IT DERIVED AT?***

3. Promote continued mutual assistance agreements with neighboring cities, the County of Los Angeles and other applicable agencies for the provision of fire protection services to the residents of the Hollywood CPA.

4. Implement the Hollywood Transportation Improvement and Mitigation Program (TIMP) contained in Section 4.5 of the DEIR (Transportation) to improve traffic conditions thereby improving fire and life safety in the community.

15-15

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL***

15-16

**FACTORS?**

15-16  
cont.

Relevant Policies of the Proposed Hollywood Community Plan

CF.5.17: Maintain fire protection services and emergency medical services which are sufficient to ensure the safety of Hollywood residents, visitors and businesses.

15-17

**WHAT ARE “SUFFICIENT” FIRE PROTECTION SERVICES AND EMERGENCY MEDICAL SERVICES? HOW WAS THIS DETERMINED?**

**WILL THE ATTAINMENT OF THESE “SUFFICIENT” SERVICES REQUIRED BY THE HOLLYWOOD PLAN IMPACT ANY SURROUNDING COMMUNITY PLAN AREAS?**

15-18

CF.5.18: Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.

CF.5.19: Promote continued mutual assistance agreements with neighboring cities, the County of Los Angeles, and other applicable agencies, for the provision of fire protection services to the residents of the Hollywood Community Plan Area.

POLICE

The Proposed Hollywood Community Plan states that it incorporates programs which help mitigate significant adverse impacts it may have on the provision of police protection to the residents Hollywood CPA. In addition to these programs and policies, the following mitigation policies are proposed:

15-19

1. Hire and deploy additional police officers growth or development generated by the implementation of the Proposed Plan pursuant to LAPD hiring and deployment procedures.

**IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?**

**IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)**

**WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?**

15-20

2. Expand and/or upgrade existing police protection equipment and/or facilities in

15-21

areas of the CPA that do not receive adequate police protection services.

15-21  
cont.

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?***

15-22

3. Pursue State, Federal and other nonconventional funding sources to expand the number of sworn police officers.
4. Promote the establishment of police facilities that provide police protection at a neighborhood level.
5. Implement the Hollywood Transportation Improvement and Mitigation Program (TIMP) contained in **Section 4.5** of the DEIR (Transportation), to improve traffic conditions thereby improving police response times in the community.

***The revised findings and statement of overriding considerations for the readopted Framework Element dated July 17, 2001 states the following for Police.***

**J. POLICE**

**1. Impacts**

The amount of population, employment and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990). Based on the planning ratio standard used to determine the adequacy of the supply of sworn officers, a total of 17,673 officers would be needed to adequately accommodate the City's 2010 average day/night population. This is in comparison to the 8,817 sworn officers that were on the force as of 1990.

15-23

These impacts are potentially significant.

**2. Mitigation Measures**

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to pay for added police protective services. Additionally the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.

15-24

In addition to the Framework Plan, other mitigation measures include:

15-25

- Planning Standards indicating the most appropriate number of sworn police officers for implementing police services shall be established.
- The existing number of sworn police officer shall be enhanced by meeting the established planning standards.

### 3. Significance

Imposition of these mitigation measures and/or alterations will reduce impacts to a less than significant level.

***DID THE DEIR STUDY THE IMPACT ON PUBLIC SAFETY OF A REDUCED CITY ATTORNEY BUDGET GIVEN THAT 70% OF ALL ARRESTS MADE MUST BE PROCESSED BY THE CA'S OFFICE.***

15-26

***DID THE CITY ATTORNEY WEIGH IN ON THEIR ABILITY TO PROSECUTE CRIME THROUGHOUT THE CITY?***

15-27

### \ PUBLIC LIBRARIES

The Proposed Hollywood Community Plan states that it includes policies that help mitigate potential significant adverse impact.

15-28

***IN ORDER TO MAKE THAT ASSERTION THE CITY HAS TO COMPARE BASELINE TO PROJECTED AND ALSO A LEVEL THAT IMPLIED SIGNIFICANT ADVERSE IMPACTS.***

***WHAT IS THE "TRIGGER LEVEL"? PLEASE PROVIDE EACH TRIGGER LEVEL AND EVIDENCE TO CORROBORATE THE TRIGGER LEVEL FOR EACH AREA.***

15-29

### PARKS

The Proposed Hollywood Community Plan states that it includes policies that help mitigate potential significant adverse impact.

15-30

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY***

***SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?***

15-30  
cont.

**WATER**

1. As part of review of individual projects, the Planning Department shall work with LADWP to ensure appropriate expansion, upgrade and/or improvement of the local water distribution system within the CPA as may be necessary to accommodate anticipated growth.

15-31

***WHAT AGENCIES OR DEPARTMENTS DID YOU COLLECT INFORMATION FROM IN ORDER TO GATHER THE INFORMATION TO MAKE THESE STATEMENTS?***

**ELECTRICITY**

1. Promote energy conservation and efficiency to the maximum extent that are cost effective and practical.
2. Encourage and provide incentives for the development and use of alternative sources of energy.
3. Adopt and implement a program to provide technical assistance and incentives to property owners and developers on building design and/or the use of energy-efficient systems in new residential, commercial and industrial developments to exceed existing State of California Energy Code standards.
4. Promote the responsible use of natural resources in consonance with City environmental policies.
5. Expand, upgrade or improve local distribution lines and facilities within the community plan area whenever necessary to accommodate increased demand for energy.

15-32

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?***

15-33

WASTE WATER

1. Continue to implement existing water conservation measures, including ultra low flush installation and, school educational, public information, and residential programs, and develop new ones as needed.
2. Adopt a comprehensive water reuse ordinance that will establish, among other things, goals on reuse of reclaimed water.
3. Establish water reuse demonstration and research programs and implement educational programs among consumers to increase the level of acceptance of reclaimed water.
4. Provide incentives for the development of new markets and uses for reclaimed water.
5. Rehabilitate existing sewers in poor structural condition and construct relief sewers to accommodate growth whenever necessary.
6. Expand or upgrade existing local sewers in the community plan area to accommodate increased wastewater flow whenever necessary.

***IS THE DEIR CONSISTENT WITH THE HYPERION SETTLEMENT? IF SO PLEASE LIST ALL DATA TO BACK UP THAT ASSERTION.***

15-34

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

15-35

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)***

***WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?***

15-36

SOLID WASTE

1. Implement the Solid Waste Integrated Resources Plan to maximize source reduction and materials recovery and minimize the amount of solid waste requiring disposal with the goal of leading the City to achieve zero waste by 2025.
2. Encourage and provide incentives for the processing and marketing of recyclable items.
3. Accelerate on-going efforts to provide alternative solid waste treatment processes and the expansion of existing landfills and establishment of new sites.

***IS THIS MITIGATION CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

15-37

***IF YES, THAT CONCEPT WAS REJECTED BY THE SECOND APPELLATE DISTRICT DIVISION THREE, FEDERATION OF HILLSIDE AND CANYON***



**ASSOCIATIONS V. CITY OF LOS ANGELES (LOS ANGELES COUNTY SUPER.CT. NO. BS042964)**

15-37  
cont.

**WHAT MITIGATION MEASURES ARE NOT CONDITIONAL ON EXTERNAL FACTORS?**

15-38

TRANSPORTATION

1. Implement development review procedures to ensure that the applicable Mobility policies of the Hollywood Community Plan are applied and implemented by individual development projects when they are considered for approval in the plan area.

**Further Recommendation:** In order to provide an additional source of funding for transportation improvements, beyond the local and regional funds typically available to the City of Los Angeles, it is recommended that a nexus study be conducted to determine the transportation impact of development accommodated by the 2030 Proposed Plan, estimate the cost of implementing the transportation mitigation measures recommended by the Hollywood Community Plan Update, and develop a means of allocating the cost of such measures to individual development projects.

15-39

**WHAT BASELINE YEARS WERE USED TO ESTABLISH DATA FOR THIS DEIR?**

15-40

**DID THIS DEIR STUDY CURRENT TRANSPORTATION CONDITIONS TO ARRIVE AT IMPACT SENERIO'S?**

15-41

**ARE MITIGATION SOLUTIONS CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?**

15-42

**IF CURRENT DATA WAS NOT USED IN THIS DEIR, IT SHOULD BE REVISED TO INCLUDE PRESENT YEAR IMPACTS AND BE RECIRCULATEED.**

15-43

AIR QUALITY

The proposed Hollywood Community Plan incorporates sustainable programs and policies that would help mitigate significant impacts on regional and local air quality. In addition to these programs and policies, the following additional Mitigation Policies are recommended:

1. The City, as a condition of approval of all discretionary projects, shall require contractors building projects within the Hollywood CPA to:
  - i) use properly tuned and maintained equipment. Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations
  - ii) use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalyts) to the extent they are readily available and feasible
  - iii) use heavy duty diesel-fueled equipment that uses low NOx diesel fuel to the extent it is readily available and feasible

15-44

iv) use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible

15-44  
cont.

v) maintain construction equipment in good operating condition to minimize air pollutants.

vi) use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.

2. The City, as a condition of approval for all discretionary projects, shall require developers to implement applicable GHG reduction measures in project design and comply with regulatory targets.

3. In the event that future projects under the Community Plan cover areas greater than 5 acres, appropriate analysis and modeling would be required for CO, NOx, PM10 and PM2.5

***WHAT BASELINE YEARS WERE USED TO ESTABLISH DATA FOR THIS DEIR?***

15-45

***DID THIS DEIR STUDY CURRENT CONDITIONS TO ARRIVE AT IMPACT SENERIO'S?***

15-46

***ARE MITIGATION SOLUTIONS CONDITIONED ON SUFFICIENT CITY BUDGET SUPPORT?***

15-47

***IF CURRENT DATA WAS NOT USED IN THIS DEIR, IT SHOULD BE REVISED TO INCLUDE PRESENT YEAR IMPACTS AND BE RECIRCULATEED.***

15-48

## NOISE

1. Re-route truck traffic away from residential streets, if possible. If no alternatives are available, route truck traffic on streets with the fewest residences.
2. Site equipment on construction lots as far away from noise-sensitive sites as possible.
3. When construction activities are located in close proximity to noise-sensitive sites, construct noise barriers, such as temporary walls or piles of excavated material between activities and noise sensitive uses.
4. Avoid use of impact pile drivers where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives where geological conditions permit their use. Use noise shrouds when necessary to reduce noise of pile drilling/driving.
5. Use construction equipment with mufflers that comply with manufacturers' requirements.
6. Consider potential vibration impacts to older (historic) buildings in Hollywood as part of the approval process.

15-49

## CHAPTER 5 OF THE HOLLYWOOD DEIR. ALTERNATIVES

Alternative #1 is the Proposed Plan analyzed by this EIR. This alternative will serve as the Project. The Proposed Plan, in general, has a reasonable anticipated level of development for land use and population, which is greater than the level of development projected as anticipated to occur during the Proposed Plan period according to the SCAG 2030 Forecast.

15-50

Alternative #2 is the Existing 1988 Plan Reasonable Expected Development (No Project) Alternative. With this alternative, there would be no project and no revision of the existing community plan. Development could not exceed the levels of reasonable development anticipated to occur under the existing community plan that was adopted in 1988.

Alternative #3 is the SCAG 2030 Forecast alternative. Under this alternative, employment, housing and population levels are analyzed at levels based on those projected by SCAG for the year 2030.

Table 5-1 compares the environmental effects of the Proposed Plan and the alternatives against the existing (2005) conditions.

***THE BASELINE FOR THIS DEIR MUST BE PRESENT DAY CONDITIONS.***

15-51

***DO YOU HAVE ANY CURRENT DATA?***

***DOES THIS DEIR INCLUDED ANALYSIS OF RECENT INFRASTRUCTURE CHALLENGES FACED BY THE CITY INCLUDED REVELATIONS ABOUT THE AGING WATER SYSTEM?***

15-52

***IF CURRENT DATA HAS NOT BEEN IN THE PREPERATION OF THIS DEIR THEN I AM RESPECTFULLY REQUESTING THAT THE PLAN BE WITHDRAWN, REVISED AND RECIRCULATED TO INCLUDE CURRENT DATA AND IMPACTS FROM THE PRESENT-DAY BUDGETARY RESTRICTIONS, WITH AN EMPHASIS ON PUBLIC SAFETY AND TRANSPORTATION INFRASTRUCTURE.***

15-53

Sincerely:

James O'Sullivan  
FixTheCity



## Request regarding Proposed Draft Hollywood Community Plan

4 messages

**Branden Chapman** <Branden@grammy.com>

Thu, May 26, 2011 at 2:17 PM

To: "Mary.Richardson@lacity.org" <Mary.Richardson@lacity.org>, "kevin.keller@lacity.org"

<kevin.keller@lacity.org>, "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

Cc: "andres2007@sbcglobal.net" <andres2007@sbcglobal.net>, "jeanne.min@lacity.org" <jeanne.min@lacity.org>

Following the Town Hall Meeting that occurred a few weeks ago, I would like to weigh in with my support on the following request regarding on the Proposed Draft Hollywood Community Plan.

Request: Change the designation of North Gardner Street (from Hollywood Blvd to Franklin Avenue) and Franklin Avenue (from Gardner Street to La Brea Avenue) to be strictly residential and NOT a collector secondary highway for through traffic.

Rationale: These two streets are strictly a residential historic neighborhood filled with families and small children. The Traffic flow going West from Highland to Franklin has been primarily diverted at La Brea south to Hollywood, and continuing West. The same traffic flow pattern should be used going East from Hollywood Blvd (near Fairfax) to Highland, and not diverted to drive through this residential historic neighborhood.

The current designation unfortunately adds to the dangerous nature of these busy streets dissecting our neighborhood.

Thank you for your attention,

Branden Chapman  
1732 N. Sierra Bonita Ave.  
Los Angeles, CA 90046

**Mary Richardson** <mary.richardson@lacity.org>

Thu, May 26, 2011 at 4:02 PM

To: Branden Chapman <Branden@grammy.com>, nadia@treemedia.com

Cc: "kevin.keller@lacity.org" <kevin.keller@lacity.org>, "srimal.hewawitharana@lacity.org"

<srimal.hewawitharana@lacity.org>, "andres2007@sbcglobal.net" <andres2007@sbcglobal.net>,

"jeanne.min@lacity.org" <jeanne.min@lacity.org>

Brandon, Don and Nadia:

I have reviewed the Draft Modified Streets Standards regarding our recommendations for Franklin between Sierra Bonita and La Brea and our proposal is essentially a "downzone", redesignating Franklin from a Secondary Highway with a 90 foot right-of-way to a Modified Collector with right-of-ways ranging from 50 feet to 68 feet. This is a big change. In effect, we have proposed to make the Modified Collector standard match the existing dimensions, which means there would be no change to the existing width of the roadways, although on Franklin between Vista and La Brea we have proposed to introduce parkways which would affect the width of the sidewalk.

The Mobility Plan of the Draft Hollywood Community Plan (page 116 - Program M.1.87.1 and Program 1.87.2) does propose a study of cut-through traffic in your neighborhood as the basis for preparing a neighborhood traffic management plan. I notice that the boundaries identified for study do not extend as far north as Franklin. I would advise you to submit written comments by June 1st recommending that the northern border of the study area be

6/6/2011

City of Los Angeles Mail - Request rega...

charged from Hollywood to Franklin. Your comments should be addressed to:

Srimal Hewawitharana  
Department of City Planning  
Environmental Analysis  
200 N. Spring St., Room 750, Mail Stop 395  
LA, CA 90012

Mary Richardson  
Department of City Planning  
Policy Planning  
200 N. Spring St., Room 667, Mail Stop 395  
LA, CA 90012

Thanks for the input.

Mary

[Quoted text hidden]

—  
Mary Richardson  
Associate Planner  
200 N. Spring St., Rm. 667  
LA, CA 90012  
213 978-1478  
FAX 213 978-1477  
[Mary.Richardson@lacity.org](mailto:Mary.Richardson@lacity.org)

---

Don Andres <[andres2007@sbcglobal.net](mailto:andres2007@sbcglobal.net)>

Thu, May 26, 2011 at 6:05 PM

To: Mary Richardson <[mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)>, srimal.hewawitharana@lacity.org  
Cc: kevin.keller@lacity.org, jeanne.min@lacity.org, Branden Chapman <[Branden@grammy.com](mailto:Branden@grammy.com)>, nadia@treemedia.com

Mary,

Thank you for your response. I did see your proposal in the Plan to downgrade Franklin/Gardner to a "Modified Collector". This proposal is definitely in the right direction but does not go far enough, and it still enables a large amount of commuter traffic through this historic residential neighborhood. That was the reason for my original Request to you to make these streets strictly residential and not just "Modified Collectors".

16-2

**Request:** Change the designation of the Franklin Avenue west of La Brea and Gardner Street north of Hollywood Blvd from Modified Collector Streets to strictly Residential streets.

I further read the following Mobility Plan on page 116 of the Draft Hollywood Community Plan:

**Policy M.1.87:** Continue to implement traffic calming measures in residential neighborhoods which are impacted by regional and arterial street traffic, while

maintaining pedestrian and bicycle circulation.

**Program M.1.87.1:** Study cut-through traffic in the area bounded by Hollywood Boulevard on the north, La Brea Avenue on the east, Fountain Avenue on the south, Fairfax Avenue on the west, and the area bounded by Hollywood Boulevard on the north, Fairfax Avenue on the east, Sunset Boulevard on the south, Laurel Canyon Boulevard on the west, and prepare a neighborhood traffic management plan, pending results of study.

**Program M.1.87.2:** Consider the implementation of Neighborhood Traffic Management Plans along canyon routes and associated streets across the Hollywood Hills, as well as neighborhoods generally located between the following streets:

- Franklin Avenue and Hollywood Boulevard
- Sunset and Hollywood Boulevards
- Sunset and Santa Monica Boulevards
- Santa Monica Boulevard and Melrose Avenue
- Franklin Avenue and Mulholland Drive

I am now making the following request:

**Request:** Recommend that the northern border of the study area be changed from Hollywood Blvd to Franklin Avenue in Program M.1.87.1 as a means to reduce the commuter traffic in the Franklin Avenue area west of La Brea.

**Don**

Don Andres, President

***Franklin/Hollywood Blvd. West Homeowners Association***

7470 Franklin Avenue

Hollywood, CA 90046-2242

[andres2007@sbcglobal.net](mailto:andres2007@sbcglobal.net)

323.333.7445 (cell)

**Note: The Franklin/Hollywood Boulevard West Homeowners Association consists of more than 150 residents. Their respective email addresses do not appear due to privacy reasons.**

---

**From:** Mary Richardson [mailto:[mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)]

**Sent:** Thursday, May 26, 2011 4:03 PM

**To:** Branden Chapman; [nadia@treemedia.com](mailto:nadia@treemedia.com)

**Cc:** [kevin.keller@lacity.org](mailto:kevin.keller@lacity.org); [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org); [andres2007@sbcglobal.net](mailto:andres2007@sbcglobal.net); [jeanne.min@lacity.org](mailto:jeanne.min@lacity.org)

**Subject:** Re: Request regarding Proposed Draft Hollywood Community Plan

[Quoted text hidden]

---

**Jeanne Min** <[jeanne.min@lacity.org](mailto:jeanne.min@lacity.org)>

**Fri, May 27, 2011 at 9:50 AM**

To: Mary Richardson <[mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)>, [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org), [kevin.keller@lacity.org](mailto:kevin.keller@lacity.org),  
Renee Weitzer <[renee.weitzer@lacity.org](mailto:renee.weitzer@lacity.org)>, Doug Mensman <[doug.mensman@lacity.org](mailto:doug.mensman@lacity.org)>

Hi Mary:

I have been reading the e-mail exchange between you and Don Andres (who is NOT copied to this email) and I wanted to provide you with some context. He and his neighbors are frustrated with the impact of the popularity of Runyon Canyon Park, and I think he believes that downgrading Franklin to a "residential" designation will prevent the public from parking/speeding/utilizing the street to access the park. The change itself will probably do nothing to solve their issues.

Our office, including several other city departments, has been working with the community to address its concerns, and they are dissatisfied with the results.

Hope this helps.

Thank you,  
Jeanne Min

[Quoted text hidden]

—  
Jeanne Min  
Chief of Staff  
Office of Councilmember Tom LaBonge  
(213) 473-7004  
[jeanne.min@lacity.org](mailto:jeanne.min@lacity.org)

For Council District 4 news and updates, please visit the Councilman's website: [www.tomlabonge.com](http://www.tomlabonge.com)



Friends of Griffith Park  
P.O. Box 27573  
Los Angeles, CA 90027-0573  
friendsofgriffithpark.org

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JUN 03 2011

ENVIRONMENTAL

May 31, 2011

Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring St., Room 750  
Los Angeles, CA 90012

Re: Hollywood Community Plan's Draft Environmental Impact Report  
ENV-2005-2158-EIR

Dear Mr. Hewawitharana:

Friends of Griffith Park is a charitable non-profit organization focused on advocacy, service, education, and support of Griffith Park, the most significant of parks falling within the boundaries of the Hollywood Community Plan. We have limited our comments to issues of "Public Parks" section only, under Public Services (4.3). We hope our comments are well-taken and acted upon appropriately.

**Inadequate Park acreage of Community and Neighborhood Parkland (CF.5.51):**

The Draft Environmental Impact Review (DEIR) accurately cites the City's Public Recreation Element of the General Plan's criteria for parkland acreage of:

- Two acres of community parkland per thousand residents,
- Two acres of neighborhood parkland per thousand residents, and
- Ten acres of regional parkland per thousand residents.

However, in reporting whether the existing conditions meet these three separate criteria, only an overall ratio is figured. This is not acceptable methodology for analysis for obvious reasons to be explained.

Per our own calculations, based upon numbers in Table 4.3-8, the regional park criteria is easily reached, skewed significantly by Griffith Park's inclusion in the Community Plan Area, with approximately 19.4 acres per thousand residents. However, we calculate a much lower than desired ratio for both Community and

17-1



Neighborhood Parks, when they are looked at on their own respective merits, as follows:

- Community parks - 0.28 acres per thousand residents (City Standard is 2.0 per thousand)
- Neighborhood parks – 0.09 acres per thousand residents (City Standard is 2.0 per thousand)

The reason why the City General Plan separates criteria by separate types of parks is that each provides unique purposes, and they serve varying needs of the citizens of Los Angeles. The vast acreage of Griffith Park, considered “regional parkland”, provides a wilderness experience and satisfies multiple passive recreational needs, such as hiking. It also has various facilities and attractions such as golfing, concessions and museums. Regional parks, according to the City General Plan, generally serve a larger audience, persons from throughout the Los Angeles basin.

Community parks, according to the General Plan, should be designed to serve residents of all ages in several surrounding neighborhoods. Its facilities serve a much wider interest range than do those of a Neighborhood site.

Neighborhood parks, according to the General Plan, should provide space and facilities for outdoor and indoor recreational activities. It is intended to serve residents of all ages in its immediate neighborhood.

Regarding “standards” for parkland, the General Plan also says: A satisfactory recreation system must measure up to accepted standards in three respects: first, there must be sufficient land area set aside for recreation; second, the recreation areas must be properly distributed in residential areas; and third, there must be facilities to meet different recreation needs - including both active and passive recreation, and have provisions for all age groups.

A portion of the Community parkland deliverables may be somewhat served by Griffith Park which is within reasonable distance from some of the Hollywood Community Plan Area. The General Plan sets this guideline: 1) A service radius of a community site is approximately 2 miles, and 2) the community park should be easily accessible to the area served.

It is the Neighborhood parkland which is most severely lacking from inclusion in the proposed plan. These are the small “pocket parks” which should be detailed now as a part of the planning process, not in the future. Although some of the needs may be met with sharing arrangements with public schools, the planning for even sharing with LAUSD is lacking. The General Plan sets these guidelines for Neighborhood Parkland: “The service radius of a neighborhood recreational site is approximately one-half mile.

The park space should be located within a neighborhood so that users are not required to cross a major arterial street or highway when walking to the site.”

17-1  
cont.

Because of the shortage of Community and Neighborhood parkland and the lack of accommodation for such parks in the proposed plan, we ask that the Final EIR include all the above-mentioned criteria set forth by the General Plan.

Furthermore, in the end, the DEIR comes to the same conclusion as the writer of this letter, even though the obvious facts regarding the General Plan’s requirements were obscured by showing only the composite calculation in the DEIR: “Unavoidable significant adverse impacts” on parks and recreation are expected as a result of the implementation of the proposed plan. Since this is - without argument - the case, we ask for an alternative to the proposed plan. The alternative plan should correct rather than perpetuates the lack of parks and recreational facilities in the Hollywood Community Plan Area, and the alternative plan should conform to the standards set by the City General Plan.

**Illumination at Night (CF.5.59)** We remind you that illumination at night is not appropriate in most regional parks, and this should be corrected in the Final EIR.

17-2

**Headworks (CF.5.64)** A correction is needed for the Final EIR, since Headworks is part of Griffith Park, therefore it is already parkland. Since LADWP has provisions to use this portion of Griffith Park, we would expect that considerable efforts will be made to make the affected land again usable for passive recreation.

17-3

**Equestrian and hiking trails (CF.5.66)** With more than 50 miles of trails in Griffith Park alone, any plans to “expand equestrian and hiking trails” should be considered a very low priority and should only be done based upon adequate needs assessments.

17-4

Sincerely,



Gerry Hans  
President  
Friends of Griffith Park



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JUN 03 2011

ENVIRONMENTAL

May 31, 2011

Ms. Srimal Hewawitharana  
 Los Angeles City Planning Department  
 Environmental Analysis  
 200 N. Spring Street, Room 750, Mail Stop 395  
 Los Angeles, CA 90012

RE: Hollywood Community Plan Update  
 Draft Environmental Impact Report

Dear Ms. Hewawitharana:

On behalf of the Hollywood Chamber of Commerce, we are submitting our comments on the Hollywood Community Plan Update (H-CPU) and Draft Environmental Impact Report (DEIR). We would like to express our appreciation to the Planning Department for the years of work that have brought us to this point. We believe the H-CPU will provide major benefits for Hollywood and the City. A great deal has happened in the more than 20 years since the plan was last updated. Hopefully, this update will clearly guide development and planning for Hollywood for many years to come – taking into consideration the opportunities that exist in this historic and great urban community.

Please consider the following issues that the Chamber has identified:

**1. Urban Design Guidelines (Chapter 7)**

**Issue:** These guidelines have different requirements in adjacent and overlapping areas of jurisdiction. The result will be increased uncertainty and unclear expectations on the part of property owners and community stakeholders. Most are overly proscriptive where they are used as a standard. They include:

- A. CRA's Hollywood Blvd. & Franklin Ave. Urban Design Plan and Guidelines
- B. CRA's Sunset Blvd. and Civic Center Urban Design Plan & Guidelines
- C. SNAP Specific Plan

Since 1921...  
 Promoting and enhancing the business, cultural and  
 civic well-being of the greater Hollywood community.

18-1

- D. Any future design guidelines to be created for specified areas such as the El Centro Residential Area (Map 27)
- E. Proposed CRA historic districts

18-1  
cont.

**Recommendation:** To avoid confusion and complexity, the Guidelines should be compared and coordinated with CRA Design Guidelines and Specific Plan Design Guidelines for consistency prior to adoption. Were the guidelines to be used as a clear statement of intent, then each project could adapt to market, use, site, leasing and community concerns without getting dinged for deviation.

## 2. Implementation of the Design Guidelines

**Issue:** The development rights of Property Owners should not be diminished by the discretionary implementation of the Design Guidelines.

18-2

**Recommendation:** The Urban Design Guidelines should include language that requires substantial compliance to the extent feasible but in no case will the guidelines trump the Community Plan or any development rights.

## 3. Modified Parking Requirement

**Issue:** The vision of the proposed ordinance is to reduce reliance on motor vehicles and increase reliance on alternative means of transportation. It is unclear if the proposed Modified Parking Requirement ordinance will be approved and in what form.

18-3

**Recommendation:** The strategies and tools included in the Modified Parking Ordinance should be included in the Hollywood Community Plan. The City should consider a cap on the maximum required parking. This would not prevent a developer or tenant to provide more parking.

## 4. Consistent Scale of Residential Areas

**Issue:** Except for certain streets, residential zones were not specifically addressed in the Community Plan. It is not clear whether consistency is directed at the 4-to-5 story midcentury development or many of the higher density landmarks from the 20s, 30s as well as the 60s. The result of the citywide downzoning that occurred in the 1980s, is inconsistent development patterns on many streets. While the prevailing building type on a given street may be four-to-five story multifamily structures, current zoning, typically RD 1.5, precludes replacement of smaller single-family or duplexes to match the density and height of the multifamily structures without a request for zone change. However, where the prevailing development pattern on a given street is single family or duplexes, we request the scale remain consistent on that street.

18-4

**Recommendation:** Consistent scale of development in multifamily residential areas should be a Land Use goal. On streets where the prevailing height and density of neighboring existing multifamily residential developments are greater than current zoning would allow, matching height and density for new multifamily housing projects should be encouraged to maintain consistent scale.

18-4  
cont.

#### 5. Live/Work for Mixed-Use Zone

**Issue:** We feel encouraging mixed use (Map 28) as an incentive for increased FAR is a worthwhile goal. However, it is unlikely that office or retail will be feasible on any streets except major thoroughfares.

18-5

**Recommendation:** The definition of commercial space for mixed-use development should include Live/Work units which will encourage mixed-use developments on side streets.

#### 6. El Centro Residential Area (Map 27)

**Issue:** We agree higher density housing is a desirable goal in that neighborhood. We noted a special Design Standards Area is proposed along El Centro Avenue.

18-6

**Recommendation:** Unique design guideline standards specific to this area are not necessary and would encumber development.

#### 7. SNAP Specific Plan

**Issue:** The SNAP Specific Plan has proven to be unworkable in encouraging higher density development adjacent to Metrorail Stations. This is due primarily to the transitional height requirements and the limitations on combining Subarea A (Neighborhood Conservation) lots.

18-7

**Recommendation:** We recommend the SNAP ordinance be reviewed for consistency with the Community Plan and recommendations for revisions be adopted.

#### 8. Removal of "D" Restrictions

**Issue:** Removal of "D" restrictions to achieve higher FAR is subject to discretionary action. This process is subject to extreme uncertainty.

18-8

**Recommendation:** We request a list of program elements be defined, that if incorporated into a project, will suffice for approval of the higher FAR.

**9. Highly Reflective or Tinted Glass**

**Issue:** In the interest of energy conservation, reflective or tinted glass on commercial buildings is often a good design strategy.

**Recommendation:** The prohibition on reflective or tinted glass should be applied only to the ground level. The level of reflectivity or tinting above the ground should be specified.

18-9

**10. Prohibit Windows Facing Windows**

**Issue:** In a compact urban environment, the prohibition of windows facing windows is unworkable.

**Recommendation:** The prohibition of windows facing windows should be limited to windows that are immediately across from each other, at the same level and less than 20-ft. apart.

18-10

**11. Signage Districts (H-CPU pg. 81)**

**Issue:** The City of Los Angeles already has signage regulations regarding the creation and adoption of sign districts.

**Recommendation:** Given that there is already a policy, we recommend that Policy LU 2.26 limiting the number of sign districts should be eliminated.

18-11

**12. Bicycle Plan (DEIR, pg. 4.5-16)**

**Issue:** The City recently adopted the 2010 Bicycle Plan. The DEIR and Community Plan should provide clarity as to how the policies of the Community Plan will be reconciled with the competing interests of various travel modes (cars, buses, pedestrians and bikes). For example, can the proposed modified street standards accommodate the competing interests of vehicular, transit, pedestrian, and bicycle uses?

**Recommendation:** Both the DEIR and Community Plan should acknowledge the various travel modes' competing interests and policies and provide flexibility regarding their implementation.

18-12

**13. Methane (DEIR, pg. 4.10-6)**

**Issue:** With regard to methane, one of the proposed mitigation measures states the City should prohibit construction of any building where there is potential for methane gas hazards. This is inconsistent with the City's methane ordinance, which allows for construction measures to address such potential hazards. Compliance with the City's methane ordinance should reduce potential impacts to a less-than-significant level.

18-13

**Recommendation:** The proposed mitigation measure for methane should be made consistent with the City's methane ordinance.

18-13  
cont.

#### 14. Hazardous Site or Condition (DEIR, pg. 4.10-6)

**Issue:** The DEIR requires the implementation of specific mitigation measures prior to the approval of a residential or public facility within 1,000-ft. of a designated "hazardous site or condition," but no definition of a "hazardous site or condition" is stated. Since many businesses may have "hazardous" materials on-site (which can be ordinary cleaners and solvents), a definition would be helpful.

18-14

**Recommendation:** The DEIR should provide a definition of "hazardous site or condition."

#### 15. Trip Projection Methodology

**Issue:** DEIR Page 4.5-9 states that existing 2005 traffic conditions were modeled using "socioeconomic data" for the 2004 Regional Transportation Plan. This model was used to project the number of daily and various peak hour trips currently generated within the Hollywood Community Plan. Similarly, while not expressly stated in the DEIR itself, Appendix C, Transportation Improvement and Mitigation Program ("TIMP"), clearly states that "socioeconomic data" was used to project future 2030 traffic conditions.

18-15

DEIR page 4.5-22 also states that two projects outside the Community Plan Area, Metro/Universal and Universal Vision Plan were considered as part of the traffic analysis.

DEIR page 4.5-27 table 4.5-10 states the estimated number of trips under existing conditions and the projected number of trips under the 2030 Proposed Plan conditions.

**Recommendation:** While the DEIR refers to various Southern California Association of Governments' models and documents, the DEIR does not expressly define or state the "socioeconomic data" used to project existing or future trips. It is not clear if simply-estimated and projected population form the basis of these trip projections or if some other factors are utilized. Generally, the existence of persons in an area does not necessarily translate into vehicle trips. Rather, the existence of various uses and those uses' development intensity and density translate into a definable trip projection. If only population, both resident and potential employees in the area, were used to estimate current and projected future trips, the DEIR does not adequately analyze the proposed Community Plan changes. Such an approach may account for residential dwelling unit trip generation and employment trip generation (which is not entirely clear in the DEIR), but it completely fails to analyze trip generation from tourist and entertainment related uses (e.g., hotels, restaurants, bar, theaters, nightclubs, music venues, etc.). Tourist and entertainment related uses tend to be high trip generator and

attract people onto the road network whose sole purpose is to frequent such a use. As a Regional Center with many of these uses in existence and with Community Plan Policies designed to continue similar development, the DEIR's use of undefined socioeconomic data to estimate current and future traffic conditions does not take these uses into account. Therefore, the DEIR does not adequately analyze traffic impacts associated with the Community Plan.

18-15  
cont.

Additionally, neither the DEIR nor the TIMP include any trip projections from the Metro/Universal or Universal Vision Plan projects. Therefore, while the DEIR states that the projects were considered as part of the analysis, there is no data to support that any trips generated by these project that could impact the Community Plan area were adequately analyzed.

Consistent with the comments set forth above, Table 4.5-10 is not supported by any data or analysis contained in the DEIR or the attached Appendices. The DEIR must contain an analysis supported by substantial evidence establishing the existing number of trips and the projected number of trips in the 2030 Proposed Plan scenario.

#### 16. Level of Development

**Issue:** DEIR Page 4.5-22 (second bullet point) states that the 2030 Proposed Plan analysis is based on the "level of development reasonably expected to occur by 2030 under the proposed plan's distribution of land uses."

18-16

**Recommendation:** The DEIR does not expressly define what is meant by the "level of development reasonably expected to occur". The proposed Community Plan includes various increases in Floor Area Ratio ("FAR"), residential density, development intensity and other similar definable envelopes in various subareas of the Community Plan area. While some of this potential development may not occur, a statement that the 2030 analysis is based on a "reasonable" level of development does not adequately convey the assumptions used in the 2030 Proposed Plan scenario. In fact, it is possible that the Community Plan area could be developed to its highest permissible density and intensity. The DEIR should have defined the level of development as the most dense and intense land uses permitted in the various subareas to adequately study the truly potential impacts associated with the Community Plan. Therefore, by not adequately analyzing the potential level of development, the DEIR does not accurately analyze potential traffic impacts.

#### 17. Aesthetics

**Issue:** The DEIR does not analyze potential aesthetic impacts. Page 6-7 of the DEIR discusses aesthetic impacts in a single paragraph that simply concludes no significant impacts will occur because design guidelines will be implemented.

18-17



**Recommendation:** The DEIR proposed both FAR and height increases in various subareas. These increases will result in taller or bulkier buildings within the Community Plan area. At times, these buildings could be sited adjacent to or near existing historical resources. Aesthetic impacts would, therefore, be potentially significant and would require mitigation to achieve a level of less than significance. The proposed design guidelines included in the draft Community Plan may not actually be adopted or may be adopted in a different form and, thus, are not proper mitigation. Additionally, the Community Redevelopment Agency is proposing design guidelines for portions of the Community Plan area. These guidelines may conflict with the Community Plan guidelines. Additionally, it is not clear how the guidelines will be enforced when they conflict with by-right development rights granted by the Community Plan and the implementing zoning ordinances.

18-17  
cont.

The DEIR should have analyzed, at minimum, the massing of potential structures, assuming the maximum permissible development envelope granted by the Community Plan to properly assess potential impacts associated with aesthetics.

## CONCLUSION

The Hollywood Chamber of Commerce would like to thank City staff for their years of hard work preparing the H-CPU and the DEIR. We also appreciate the outreach work conducted in connection with this process. However, we are concerned that the DEIR is broadly drafted and does not analyze all potential significant impacts that could occur as a result of the H-CPU build-out. Hollywood is a Regional Center that will experience more than a reasonable level of development, which is assumed but undefined in the DEIR. Basing the DEIR's analysis on this assumption has resulted in a DEIR that does not analyze all potentially-significant impacts and potential mitigation measures that might reduce these impacts to a level of less than significance. The DEIR is an opportunity to assess the potentially significant impacts associated with Hollywood's future development as a Regional Center, but because of the assumptions used in the DEIR, it does not capture an opportunity that is seldom available.

18-18

Sincerely,



Leron Gubler  
President & CEO



June 1, 2011

Los Angeles Department of City Planning  
200 N. Spring Street, Room 667 & 701  
Los Angeles, CA 90012

Attn: Kevin Keller  
Srimal P. Hewawitharana  
Mary Richardson

Re: Draft Environmental Impact Report  
State Clearinghouse No. 2002041009  
City of LA EIR No. 2005-2158(EIR)  
CPC No. 97-0043 (CPU)

**VIA EMAIL**

Dear Planning staff,

On behalf of our client, Hollywood Community Housing Corporation (“HCHC”), we are communicating to request that the recommendations for Subarea 9:2 be considered for revision to a less restrictive R3-1 zoning or deletion. The recommended Plan Amendment/Zone Change actions were proposed several years ago as a targeted strategy to discourage real estate speculation that might have resulted in the loss of existing bungalow courts interspersed with the more dense housing found in the immediate and adjacent neighborhood. In the intervening years, however, there has been significant public and private investment to retain and substantially upgrade bungalow courts within this sub area. This change in circumstances has included, but is not limited to, the HCHC purchase and rehabilitation of three bungalow courts properties, located in Subarea 9:2 at 1516, 1544 and 1554 N. Serrano Avenue, for occupancy by affordable housing tenants. Most important, the impact of adopting the current recommendations would be that a substantial amount of the existing housing within Subarea 9:2 would become non-conforming as a result of the proposed zoning actions.

19-1

Since its founding in 1989, HCHC, a nonprofit housing development corporation, has significantly increased the availability of affordable housing in the greater Hollywood and surrounding communities. HCHC has developed and oversees management of 22 buildings with over 700 units of safe, attractive and centrally-located affordable housing in new construction and restored properties, with an additional 236 units now in pre-development. HCHC has 7% of its properties designated for seniors; 75% designated

19-2

Los Angeles Department of City Planning  
Re: Draft Environmental Impact Report  
State Clearinghouse No. 2002041009  
City of LA EIR No. 2005-2158(EIR)  
CPC No. 97-0043 (CPU)

June 1, 2011

for families and 18% for individuals; with 30% of the overall portfolio designated for disabled and/or formerly homeless or chronically homeless households.

19-2  
cont.

Under the current zoning, HCHC has a pending development application for a 54 unit multi-residential building containing 53 restricted affordable units and one non-restricted managers unit on property located between 1600-1608 N. Serrano Avenue and 1601 N. Hobart Boulevard, with the Serrano frontage within Subarea 9:2. This application, filed on June 9, 2010 is being processed in City Plan Case No. APCC 2010-1554-SPE-ZV-DB-SPP. Since portions of the subject property are located in the Hollywood Redevelopment Project and the East Hollywood/Beverly Normandie Earthquake Disaster Assistance Project, the Community Redevelopment Agency is the lead agency for environmental clearance of the proposed project.

19-3

The CRA/LA prepared a draft Mitigated Negative Declaration (“MND”) on August 18, 2010. A Notice of Intent (“NOI”) to Adopt the MND and an Errata to the MND was circulated from October 18, 2010 to November 8, 2010. The NOI was mailed to the Department of City Planning, as a recognized responsible agency. However, the Department of City Planning did not provide any comments during the comment period. Furthermore, neither the Draft Hollywood Community Plan Update nor Draft Community Plan Update EIR acknowledge projects that are currently underway in the planning process that may conflict with the proposed land use designations and changes. More importantly, the Cumulative Impact Analysis fails to address the Proposed Plan’s consistency with other adopted Plans or policies such as the Hollywood Redevelopment Plan and Regional Housing Needs Assessment that promote and encourage affordable housing.

19-4

19-5

Within Subarea 9:2 there are a total of seventeen ownerships. Utilizing information available from the Department of City Planning Zoning Information and Map System and Assessors Maps, of the eleven properties existing along the east side of Serrano Avenue, five would become non-conforming by adoption of the proposed recommendations. There are six properties along the west side of Serrano Avenue and five would become non-conforming.

19-6

Given the existing dense built environment, each property within Subarea 9:2 has unique surroundings dependent on adjacent development. In lieu of the proposed Plan Amendment/Zone Change which would result in much of the housing stock to become nonconforming, utilizing the existing regulations to review density, scaling and other aspects of specific development is sufficient to achieve the stated goals associated with the recommendations since the entire neighborhood is within the boundaries of the Vermont/Western Transit Oriented District Specific Plan.

Los Angeles Department of City Planning  
Re: Draft Environmental Impact Report  
State Clearinghouse No. 2002041009  
City of LA EIR No. 2005-2158(EIR)  
CPC No. 97-0043 (CPU)

June 1, 2011

Sincerely,



Mark Brown  
President

cc: via email

Maura Johnson, HCHC  
Jenny Healy, HCHC  
Kip Rudd, CRA  
Shane Parker, Parker Environmental



**HOLLYWOOD HERITAGE, INC.**  
**P.O. Box 2586**  
**Hollywood, CA 90078**  
**(323) 874-4005 • FAX (323) 465-5993**

May 5, 2011

Srimal Hewawitharana  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Hewawitharana:

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the Hollywood Community Plan, and the accompanying Draft Environmental Impact Report (DEIR).

For three decades Hollywood Heritage has been a staunch advocate of the preservation and protection of Hollywood's historic resources and has long anticipated the update of the Community Plan. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans in transportation zones and neighborhoods and in property entitlement discussion involving historic resources. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood. Today we find ourselves with the opportunity to codify preservation policy for the area in the Community Plan and to provide systematic implementation goals for resource protection in a planning document which should serve as the umbrella and the guide for all other plans, design guidelines, and entitlements.

Unfortunately, the Plan in its current form does not fulfill its stated policy goals to protect historic resources. In fact, many of the Plan's implementation measures are detrimental to existing resources. Mitigation measures, while positive, lack specificity, defer implementation, and do not offer an appropriate monitoring program.

20-1

We find the current version of the Draft EIR to be deficient in the following areas:

- 1. The Plan does not contain sufficient information regarding the location, type and status of resources in Hollywood.**

20-2

Earlier this year, Hollywood Heritage was encouraged to review the findings of the long-awaited *Hollywood Historic Resources Survey Update* for the CRA area and to participate in the Planning Department's Survey LA program for Hollywood. These surveys were undertaken to assess the current number and relative significance of historic resources, including Hollywood's historic core, its neighborhoods, the National Register of Historic Places Hollywood Boulevard Commercial and Entertainment Historic District (HBCEHD) and various entertainment-related sites. These surveys will ensure that the community, planners, developers, property owners and preservationists have reliable, updated, contextual information regarding Hollywood's historic resources.

The current surveys build upon older surveys. Since 1986 there have been three geographically-based historic resources surveys of the Hollywood Redevelopment Project Area (1986, 2003 and 2009) and two site-specific surveys of damage connected to the civil unrest of 1992 and the Northridge Earthquake of 1994. In addition, there have been numerous site-specific assessments conducted for project review by CEQA and Section 106 activities. Both geographic and thematic contexts in which to evaluate resources have been prepared. Many of Hollywood's significant structures have been recognized and their significance confirmed by multiple studies. Significant properties identified in studies, whether designated or not, are considered historic resources under CEQA and thus subject to environmental review.

Given the substantial amount of research done to identify historic properties in Hollywood over the years, we are disappointed by the Plan's current state of resource identification and lack of specific protections for these resources.

The Plan has understandably focused on new development. However, even if that were its sole purpose, to make sense of the outcome, the Plan needs to include better information regarding existing conditions, most importantly the presence of historic buildings. To rectify this issue, the Plan should contain the following:

- Existing Land Use Maps: A map of current land use and development intensities in the Plan areas is missing.
- Comprehensive List of all designated and eligible resources in the Plan area. This "inventory" should include designated resources from the National Register, the California Register, City of Los Angeles Historic Cultural Monuments (HCM), and Historic Preservation Overlay Zone (HPOZ), those identified on the Historic Resources Inventory and those identified in categories 1 through 5 in current surveys (CRA 2009 update, SurveyLA Year 1). Furthermore, the historic resources listed in the Cultural Resources Section of the DEIR do not match the historic resources listed in the Plan. Nor are these resources, and those identified as eligible in recent surveys, adequately mapped or described.
- Historic Resources Map: A comprehensive map of designated and eligible historic resources in all categories is missing. HCMs, HPOZs, historic districts, and identified historic resources is fundamental information for a Plan purporting to sensitively develop around them. There are several individual maps which address a portion of this map, however there is no complete map.
- Proposed Land Use Maps: The current zoning and proposed Community Plan land use and development intensities should be mapped and included in the Plans.
- Proposed Land Use Conflicts Map: An overlay map indicating conflicts of existing land uses with proposed land uses is missing. Without such a map, two basic issues of the Plan are left vague and may be misunderstood—on which sites should development take place, and on which sites would the existing or proposed development intensity threaten historic buildings?

Decision makers and the public require simple, complete illustrations of existing conditions. The current maps and charts in the Plan do not present a holistic framework; there is no sense of which maps could combine to highlight the magnitude of impacts on resources.

20-2  
cont.

Finally, several potential neighborhood historic districts have been identified in recent surveys. In order to protect these areas, basic land use mapping with historic resources identified must be added to this Plan. To mention the protection of and compatibility with historic resources and existing historic settings without clearly identifying all of them is a glaring inconsistency, especially when that information is readily available. In the absence of these basic maps, it is impossible to gauge whether the Plan as a whole is meeting its objectives, and legally complying with other Plan, including the CRA's Hollywood Redevelopment Plan. There is no way to evaluate whether the proposals in this Plan are effective, desirable, or ineffectual, as they are inadequate as illustrated.

**2. Most significantly, the plan does not provide explicit recognition of significance for the internationally recognized Hollywood Boulevard Commercial and Entertainment Historic District, nor does it provide adequately for the preservation of this resource.**

20-3

The heart of Hollywood is listed in the National Register of Historic Places and functions as one of the City of Los Angeles major tourist destinations and economic engines. Each and every reviewer who has worked on this response with Hollywood Heritage returned with the same alarming conclusion: the Plan as conceived allows for the radical redevelopment of the National Register Hollywood Boulevard Commercial and Entertainment Historic District (HBCEHD) and has the potential to permanently damage the District. After resolving a lawsuit with the CRA which revolved around the appropriate procedures for preserving historic resources, Hollywood Heritage did not expect that this Plan, which functions as an umbrella to the Redevelopment Plan and other specific plans or urban design plans, would result in potential adverse affects to our most significant resources.

The HBCEHD contains 103 of the most important buildings in Hollywood, listed at the national level of significance in the National Register of Historic Places. While some stand alone as individual, internationally-recognized monuments including the Grauman's Chinese, the El Capitan, and the Egyptian Theater, these landmarks are among 100 other structures on Hollywood Boulevard between Orange and Argyle that make up the most significant historic district in Hollywood and arguably in Los Angeles, surpassing even downtown Broadway in national and international significance.

The District was formally designated by the National Park Service on behalf of the Secretary of the Interior in 1985. At the time, there were over 60 contributors and approximately 40 non-contributors which all dated from the period of significance 1905-1935. Since its listing, the District has seen significant and positive restorations, now having the largest collection of restored historic theaters in use in the nation. The District can count the beneficial reuse of the Broadway and Equitable Buildings, the Hollywood Professional Building, and the Nash Building, and many restorations, spurring the renaissance of Hollywood.

But the District has suffered the loss of several contributors, and seen the addition of large developments such as Hollywood and Highland, the W Hotel and Madame Tussaud's. Other buildings are currently non contributors due to bad remodeling. Hollywood Heritage continues to monitor the District and to identify potential contributors, which have significance, historic association and integrity and have attained the commonly accepted 50-year threshold of age.

In addition structures, constructed between 1935 and 1960, which were previously ineligible due to age, may now meet the criteria to be included in the district as contributors. The organization believes that a small collection of significant contributors in adjacent lots and side streets,

including such landmarks as the Montalban Theater have clear association with the historic district.

20-3

For purposes of this Plan, all buildings and features built before 1964 within the boundaries of the HBCEHD should be treated as resources of the district regardless of their current individual evaluation, until the district has been formally amended to reflect the extended period of significance and the current level of integrity of the properties. Hollywood Heritage recommends that the properties within the district boundaries be treated as an HPOZ or Community Design Overlay district which preserves historic buildings and adjacent construction according to the *Secretary of the Interiors Standards and Guidelines for Rehabilitation*, as contained in the *Secretary of the Interiors Standards for the Treatment of Historic Properties*.

**3. The plan acknowledges that historic resources are an important component of planning policy. However, the Plan does not adequately protect those resources through overall land use policy or stated mitigations**

20-4

The Plan states:

*The Proposed Hollywood Community Plan also contains policies and programs to protect the character of low-scale residential neighborhoods and the rich built history of key buildings and places that are considered historically and culturally significant.*

*Long range implementation programs include proposed historic preservation studies and districts, a Neighborhood Character Front Yard Paving ordinance, an Alley Improvement Plan, an Alley Maintenance Plan, commercial design overlay districts, nexus studies, streetscape plans, and a hillside neighborhood study.*

*"To make the height districts in Hollywood's commercial areas consistent with those in other community plans, the Proposed Plan proposes to remove the development limitations that were imposed by the 1988 Update."*

*"They promote architectural compatibility and landscaping for new multiple family residential developments to protect the character and scale of existing residential neighborhoods, support historic preservation goals in neighborhoods of architectural merit and/or historic significance, and promote the preservation and rehabilitation of individual residential buildings of historic significance."*

The Plan contains:

*A map of numbered subareas where the Proposed Plan recommends various changes in land use designations, zones, height districts, qualifying conditions (Qs) and development limitations (D), Draft Planning Land Use and Zone Change Map.*

*A matrix to be referenced when reading the Draft Matrix of Existing, Planned and Proposed Planned Land Use which contains detailed information regarding the Qualifying conditions and Development Limitations which are either removed, changed or added by the Proposed Plan, Draft "Q" Qualified Conditions and "D" Development Limitations. P3-6 The Proposed Plan includes the following:*

*A policy that reiterates the Cultural Heritage Ordinance policies regarding treatment and review of designated Historic-Cultural Monuments.*

*A policy (LU.1.6) aimed at recognizing building permit review of buildings listed on or eligible for the National Register (see also Mitigation Measure 2 below).*



*Programs (LU.1.5.1, LU.1.5.2, LU.1.5.3) that encourage additional study and HPOZ designation of areas (see also Mitigation Measure 3 below).*

*A policy and a program (LU.1.15, LU.1.5.4) encouraging generalized support for SurveyLA and additional study of a particular area to be surveyed (see also Mitigation Measure 4 below).*

*A policy (LU.1.7) stressing conformance with the Secretary of the Interior's Standards for high-density projects impacting historic resources and addressing potential impacts to projects located adjacent to historic districts (see also Mitigation Measure 5 below regarding project specific review).*

*A policy (LU.1.11) to protect historic resources in FAR Incentive areas (see also Mitigation Measure 6 below).*

The Plan's Goals and Objectives are well presented, however the Plan does not provide enough tools or proposals for the clear implementation of the Goals and Objectives. The Community Plan must be the primary tool for protection; compatible and sensitive new development should be appropriately regulated by this Plan to avoid significant impacts.

The following tools can be used to ensure protection of existing resources:

- Use transfer of development rights to benefit historic buildings. In order for this tool to work, surrounding land use and density must be contained so that a developer wishing to increase entitlements can augment the existing land use and density through preservation incentives. If the plan already allows a substantial increase in height and density there is no incentive to retain historic buildings that are developed below the heights and density of the current plan. In order to support the financial viability of maintaining historic buildings, a TDR program could provide private compensation for property owners who have landmark buildings. Sale of development potential taken from these historic sites should not be used on other sites which demolish historic buildings.
- Coordinate the demolition process of any building 50 years old, or older with approved plans for development. In addition, no empty lot shall be permitted to remain unimproved.
- Use the Secretary of the Interior's standards and guidelines for all rehabilitation projects involving historic resources, including the SOIS guidelines for additions and in-fill. The Community Plan and all other Specific or Urban Design Plans should not attempt to excerpt the Secretary of the Interior Standards, but should rather simply present them verbatim for use. Reinterpreting the Standards is a dangerous and unnecessary undertaking. Specific sources must be cited for analyzing the impact of new construction on historic districts. Users should be referred to an OHR staff member, preservation professional, the National Park Service, and other specific sources. The Standards must be the starting point for any review in an historic district, including analysis of the effect of an undertaking on the district as a whole.
- Encourage the use of the 20% Federal Investment Tax Credit for use in the rehabilitation of National Register listed and eligible buildings.
- Improve and streamline the building permit process to provide early technical assistance by the staffs of Planning, Building and Safety and/or Redevelopment to ensure compatible rehabilitation. Rehabilitation of commercial store fronts is a significant example in which Secretary of the Interior compliant rehabilitation would be of great benefit.

#### **4. By permitting inappropriate heights and density, the Plan facilitates the destruction of historic buildings.**

The Plan may have made a sincere attempt to control the design of buildings of greater height, but the permission of “by right” development to Plan standards, is incompatible with the goal of protecting historic structures.

In the past, the City Planning department imposed a “D” condition on properties fronting Hollywood Boulevard. This prevented the use of development rights without acknowledging the presence of historic buildings. Those “D” condition requirements remain today. However the Planning Department is proposing removing them in this document. Therefore if the plan in its current form is adopted, land use policies will endanger existing historic buildings.

- Under the proposed plan a blanket height of 45 ft would be allowable in the center of the Boulevard, an area dominated by one and two story buildings. Of this area, all but two blocks are nationally significant. This 45’ height limit may have been proposed to protect the historic buildings, but it is abstract and doesn’t prevent demolitions. It doesn’t squarely address and solve the basic conflict that gave rise to this plan.
- At the western end of the Boulevard height limits of 150 ft are permitted even though this portion of the District includes the most architecturally significant block, the southern side of Hollywood Boulevard between Highland and La Brea. In this stretch of the Boulevard, this is a particularly alarming and arbitrary scenario.
- At the eastern end of the Boulevard certain parcels within the HBCEHD also fall in the unlimited height district area. Maps should be amended to clarify the status of vacant parcels outside the District boundaries.
- Potential multifamily residential historic districts are threatened by a blanket height limit for new construction of 60ft. Height should be limited to existing for landmark buildings, and should be determined by individual neighbor sites to allow for sensitive additions rather than a monolithic 60ft height. The traditional patterns of development should be respected and enforced- respecting parcel lines, and forbidding the joining of no more than two parcels for a single project. Traditional lot coverage requirements and setbacks should be maintained.
- Height proposals appear arbitrary and are not adequately explained in context.
- The west and east sides of Highland Avenue have two different suggested heights, both overlain on important historic buildings. Sections of the HBCEHD are in areas allowing 150’.

#### **5. The mitigation measures as currently written are inadequate.**

The Plan contains a number of mitigation measures which are designed to lessen the impact of the Plan on historic resources. However, the language of each of the eight measures does not permit the reader to evaluate the measures feasibility and the likelihood of appropriate implementation. The mitigation measures as stated in the Plan lack specificity and are potentially deferred mitigation. In the Plan, mitigation measures are to be conducted and monitored by the woefully understaffed Office of Historic Resources. While the staff is experienced and knowledgeable, it is not reasonable to expect that they can fulfill this task. The language of some mitigation measures is vague; in particular numbers 4 and 5. Hollywood Heritage supports the intent of these measures, but as written they are not implemented, merely discussed. How is one to monitor these good intentions? Can these measures comprise a “preservation plan” for Hollywood which is followed by all relevant agencies? Why restrict input from the Office of

20-5

20-6

Historic Resources (mitigation #5) to projects where the Department of City Planning is the lead agency if this Plan is to govern all development in Hollywood? We would also like the Plan to explain how mitigation measure #6 will be utilized if the height and densities identified in the Plan are adopted. Why not combine portions of mitigation measures 1,2,5,7 and 8 into an overall specific preservation plan for the Hollywood Boulevard Commercial and Entertainment Historic District?

20-6  
cont.

Hollywood Heritage suggests the following additional mitigation measures to protect historic resources and further mitigate the Plan's acknowledged significant impacts:

- Tie demolition permits on buildings 45 years or older to approved building plans (see the Station Neighborhood Area Plan or the CRA/Hollywood Heritage interim settlement agreement for models). This ensures early project review by appropriate parties and will lessen the impact for designated and eligible resources.
- Create a rehabilitation plan for the Hollywood Boulevard Commercial and Entertainment Historic District using the Secretary of the Interior's Standards.
- Implement a technical assistance program for owners of historic properties using appropriate city agencies, qualified non-profits (Hollywood Heritage, Los Angeles Conservancy or the Hollywood Community Housing Corporation) and HPOZ board members. Use Neighborhood Councils, homeowner associations and electronic media to facilitate communication.

**6. Provide a preservation alternative to the Hollywood Community Plan which lessens the impact of the proposed plan on historic resources**

20-7

CEQA requires that alternatives to the proposed project be prepared which would lessen the impact on historic resources. While the Plan correctly states that each and every demolition of a resource would in fact be a significant effect on the built environment, it has not addressed an alternative which would lessen any adverse affects on individual resources or the entire population of resources. Such an alternative should include, at a minimum, more precise language regarding the redevelopment of property with existing historic structures and a consideration of more precise height and bonus density tools to better integrate existing historic structures into the planning process.

**7. The Plan lacks a technical report analyzing the impacts. It is not enough to state the potential impacts without careful examination.**

20-8

The DEIR lacks a technical report which identifies the existing condition of historic resources and then analyzes the impacts of the Plan on those resources. The Cultural Resources Section of the DEIR globally identifies impacts, but does not present adequate information about the number and types of resources in sufficient detail. Further, the DEIR states potential impact but does not analyze the cumulative effect of the proposed land use height and density changes.

**CONCLUSION**

20-9

This Plan may have aimed to encourage the preservation, restoration, and re-use of historic structures. However, until historic buildings are specifically identified, and specific and directed planning tools developed to protect them, the Plan fails to meet this goal. In fact, the Plan seriously endangers Hollywood's historic resources, including most significantly, the nationally renowned Hollywood Boulevard Commercial and Entertainment Historic District.

The final version of the Plan must be changed to protect historic buildings, not simply regulate the new buildings that replace them. The Plan does not eliminate the incentives to demolish historic

buildings. Specifically, it does not give a clear picture of what is historic in Hollywood, nor does it highlight the potential benefits of rehabilitation. The Plan does not sufficiently represent the historic development of Hollywood, especially the Studios and Hollywood Boulevard – one of the city's most important assets.

The current version of the Plan does not encourage the protection and preservation of resources within the nationally significant Hollywood Boulevard Commercial and Entertainment Historic District, sensitive adjacent neighborhoods, nor significant individual resources throughout the Plan area. Instead, it permits high densities and tall buildings on the sites of existing low-density historic buildings, and does not deal with the conflict of permitted zoning and existing buildings.

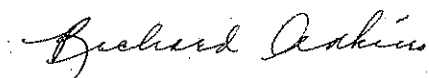
It is alarming and mysterious to us that documents currently being prepared by the Planning Department and other entities such as the Community Redevelopment Agency, though seeming to share similar goals, are not integrated in their approaches. The Hollywood Community Plan should provide a consistent, integrated and responsible approach to future planning, entitlements, and land use based upon the preservation of existing historic structures.

The City Council, the Planning Department and the Redevelopment Agency, as the permitting agencies of the City responsible for Hollywood, are the stewards of its historic resources. Decisions for development shall not impair the integrity (setting, location, design, materials, workmanship, association, and feeling) of Hollywood's historic resources through attrition, demolition, or inappropriate alteration. The Plan should facilitate good preservation practice and stewardship of resources. This approach will ensure the healthy economic development of this popular tourist destination and provide a livable community for its residents.

The lack of a preservation alternative and incomplete, inadequate, potentially deferred and unenforceable mitigation measures are serious defects in the structure of the DEIR. Further, it is inappropriate to use the existing 1988 Community Plan as a base project. Planning for historic resources has evolved substantially in two decades. The goal should be to have a better plan with fewer impacts than the 1988 effort.

Hollywood Heritages remains appreciative of the Planning Departments efforts in this extremely important Plan. We value and respect the Plan's inclusions. We will work diligently with you to ensure that the urgently missing pieces-- to preserve and protect the Hollywood Boulevard Commercial and Entertainment Historic District, its historic residential neighborhoods, and entertainment industry related sites --are included through regulation, incentives and technical assistance.

Sincerely,



Richard Adkins  
President

20-9  
cont.



**Hollywood Knolls Community Club**

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**3360 Barham Boulevard, Hollywood, CA 90068**

**(323) 436-0364**

June 1, 2011

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

[Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

RE: Comments on the Hollywood Community Plan Update DEIR

Case No. EIR-2005-5158-EIR  
State Clearinghouse Number: 2002041009

Dear Ms. Hewawitharana,

The Board of Directors of Hollywood Knolls Community Club (HKCC) thanks you, the City of Los Angeles for the opportunity to respond in writing to the proposed Hollywood Community Plan Update Draft Environmental Impact Report. HKCC is the residents' association covering close to 800 homes in the Hollywood Knolls, Hollywood Manor and Lakeridge Estates. Our physical proximity to the proposed upzoning makes us especially concerned with all aspects of it. What follows are our comments and questions on the proposed increase in commercial density and height in our neighborhood. Further, this organization reserves all rights to comment and provide

21-1

additional relevant information at some future date, without reservation and as allowed us by all past, present and future administrative processes.

21-1  
cont.

According to the document, there are three locations in our neighborhoods which are proposed to be upzoned, as described in the Draft Matrix of Existing, Planned and Proposed Land Use. In each case, the proposal is to increase the allowed density to FAR 1.5:1 from 0.5:1. This increase would be dramatic and have immediate, negative effects on the immediately proximate neighborhoods and surrounding region.

SA 1.1 –East Corner of Hollycrest and Barham

SA 1.2—Northeast and Southeast sides of Barham and Lake Hollywood intersection

SA 1.3—Northeast Corner of Forest Lawn and Lake Hollywood

First, a general comment. Barham Blvd is an already impossibly congested thoroughfare. Barham is the only major artery connecting the 101 (and Fire Station 76) and the neighborhoods on either side. ANY increase in density, especially commercial space which creates incremental traffic in very concentrated times during the work day, would be disastrous. As it is, it can easily take 40 minutes during heavy traffic periods to travel the short distance between Forest Lawn Drive and Lake Hollywood Drive. Adding commercial density can only make this condition worse.

21-2

Three major intersections vital to our neighborhoods--Cahuenga East/Barham, Cahuenga West/Barham, and Barham/Lake Hollywood Drive -- are all considered to be at Failure levels already. Therefore, any increase in traffic through these intersections makes the existing Failure condition that much worse.

A major issue is that Hollywood traffic gridlock backs up North into the Cahuenga Pass (Cahuenga to Barham) making it difficult for life safety vehicles (fire, paramedic, police) to reach emergencies in the Pass and the Hollywood Knolls, Lakeridge Estates The Hollywood Manor, the Oakwood Apartments and Griffith Park, the last two of which having had major fires recently. Backed up traffic also has immediate negative effects on North Hollywood, Toluca Lake and Studio City.

21-3

During rush hour, Barham Boulevard comes to a standstill. During off-rush-hour times, Barham is a high-speed, dangerous road that cannot accommodate increased activity in and out of the adjacent properties. In the not too distant past, there was a fatal accident at the corner of DeWitt Drive and Barham precisely because drivers were exceeding the speed limit. To permit more intense development at the crest of Barham Boulevard, where drivers are routinely traveling at near-freeway speeds, would be the height of irresponsibility.

The increased density is proposed without any of the necessary traffic fixes or improvements in public transportation, all of which need to be *a priori* to an increase in density.

Increased commercial density also means worsening the situation with parking on the adjacent residential streets. What studies have been done to determine how much, if any, extra parking could be absorbed on the local streets? The residential streets next to all three sites proposed for upzoning already have a terrible problem with visitors to existing commercial properties taking up residential street parking.

21-4

There is no parking for increased development. Because of the impact of the development that already exists along Barham, residents have had to secure permit parking on many of the streets of our neighborhood. Yet despite repeated calls to report violators, the City does not routinely or consistently enforce the permit parking, which means that most of the time we cannot park near our houses during business hours.

Local parking capacity is already maxed out and is worse than the document's preparers must have thought since they have their basic facts wrong. For example, in the DEIR, Barham Blvd is described as having "two lanes in each direction with on-street parking on both sides of the street, with length of time restrictions in many blocks." This assertion regarding the parking is completely inaccurate. There is absolutely NO parking on any part of the west side (southbound) of Barham. Further, the Universal Evolution Plan DEIR calls for adding an extra southbound lane on Barham which would even wipe out what little parking lot parking there is for the current businesses there.

On the east side (northbound) stretch of Barham there is only street parking for about 10 cars in front of a two story condo complex and room for approximately 15 more cars just a little farther north. These spaces are not near any building so their usefulness is negligible. Besides these small areas, not only is there no parking for the entire 1.1 miles of Barham but it is redcurbed as "No Standing Any Time."

The properties in question along Barham Boulevard are in a canyon that is entirely overlooked by a residential neighborhood of mostly single family homes. Increased height along Barham will block views and sunlight for residents. In the 1980s the City permitted an oversized office building at the corner of Blair Drive and Barham that has for two decades been an eyesore in our community, blocking views and dwarfing the small-scale residential streets that adjoin it.

21-5

Increased commercial density plus the accompanying increased traffic also further harm all of the wildlife (flora and fauna) in the adjacent streets and neighborhoods, especially with Barham and Forest Lawn sitting in the midst of a wildlife corridor. There is inadequate information in the DEIR regarding any acceptable studies on the short- and long-term negative impacts on the local and regional environment caused by the proposed increased commercial density.

21-6

These issues concern all three areas proposed for increased density. In addition, there are some specific problems. For example:

21-7

SA 1.1 sits at the beginning of the Hollywood Knolls, an entirely residential (almost entirely single family residences) neighborhood. The car repair business which is there

has already caused severe problems in terms of creating traffic and taking up residents' parking spaces. Increased density at this site would also add to an already terrible problem with traffic, noise, air pollution and visual blight in this 100% residential neighborhood.

21-7  
cont.

SA 1.2 sits at the entryway to the Hollywood Knolls, a 100% residential neighborhood, made up of almost entirely single family homes. Increased commercial density at these two sites would make a bad traffic situation even worse, backing up into Lake Hollywood Drive into the neighborhood which is already overburdened by terrible cut through traffic. Several years ago, the neighborhood petitioned the City for signs on Cahuenga East, prohibiting right hand turns off of Cahuenga into the neighborhood (Benda and Hollycrest) during morning rush hour to mitigate the cut-through traffic. The City acknowledged that this problem existed and was deemed the situation bad enough to warrant installing no-right-turn (during morning hours) signs. Some of the more popular cut-through routes are as follows:

21-8

- Cahuenga East to Hollycrest Drive to Primera to Lake Hollywood Drive to Barham Blvd.
- Cahuenga East to Benda to Primera to Lake Hollywood Drive to Barham Blvd.
- Cahuenga East to Lakeridge Place to Wonder View Drive to Tareco to Wonder View Drive to Lake Hollywood Drive to La Suvida to Lake Hollywood Drive to Barham Blvd.
- Franklin Ave to Beachwood Drive to Ledgewood Drive to Mulholland to Tahoe to Lake Hollywood Drive to La Suvida to Lake Hollywood Drive to Barham Blvd.
- Cahuenga East to Hollycrest Drive to Benda to North Knoll Drive to Lindo to La Falda to Lake Hollywood Drive to Barham Blvd.

Were these cut-through routes studied as part of the preparation of the DEIR to determine how the admitted increase in traffic, brought on by increased commercial density especially along Cahuenga East, Cahuenga West and Barham Blvd. (northbound and southbound), would exacerbate this already significant problem? What specific mitigations have been planned to make sure that cut-through traffic does not increase as a result of additional traffic demands?

Other negative impacts to this residential neighborhood include the aforementioned parking issue along with traffic, noise, air pollution and visual blight with buildings inconsistent to the single family residences right next door.

21-9

SA 1.3 is said to be at "Northeast Corner of Forest Lawn and Lake Hollywood" except there IS NO SUCH INTERSECTION. From the accompanying maps elsewhere in the DEIR one can infer that the preparers meant the parcel on the corner of Forest Lawn and Barham on which there is already has a huge office building. There is very limited parking on the west side of Forest Lawn, creating a huge parking problem on the east side which is completely filled during the day. Often, students of the New York Film Academy have to park a half mile away on Forest Lawn as a result and become a

21-10



serious safety issue as the cross the street (there is a very long stretch with no crosswalks or traffic lights) to go to class.

Being at the north end of the traffic funnel, with the constant heavy flow of cars coming off the 134 to get down to the 101, an increased density in this area would already make this traffic issue that much worse, inconveniencing residents, negatively affecting their quality of life because of increased air pollution and noise and putting them in peril as emergency vehicles would be slowed in their response.

21-10  
cont.

When the issue of upzoning on Barham last came up in 2006, our entire community made it manifestly clear to Mary Richardson and other involved public officials that we were totally opposed to such a plan for most of the reasons outlined in this letter. We are deeply disappointed and incredulous that no attention has been paid to our consistent, strong opposition to these proposed changes and we find ourselves having to once again point out the obvious flaws in the plan.

21-11

HKCC is opposed to ANY zoning changes which would result in increases in density or height along Barham Blvd. and we urge you to preserve the existing zoning ordinances.

Regards,

Daniel Savage  
President  
Hollywood Knolls Community Club

CC: Councilmember Tom LaBonge



June 1, 2011

**Submitted by email**

Ms. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012  
Email: [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)

**RE: Hollywood Community Plan Update Draft EIR, ENV-2005-2158-EIR**

Dear Ms. Hewawitharana:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education.

The Conservancy, along with Hollywood Heritage, has long been active in protecting the historic resources in Hollywood. While we appreciate that efforts to protect historic and cultural resources are woven throughout the most recent draft of the Hollywood Community Plan dated July 2010 (Proposed Plan), we remain concerned that potentially significant adverse impacts to historic resources are not fully evaluated in the DEIR. We also believe additional refinements to the Proposed Plan can further mitigate adverse impacts while developing meaningful tools and incentives to shape future growth in Hollywood without sacrificing its irreplaceable heritage.

**I. Historic and Cultural Resources in Hollywood**

With development starting prior to its establishment as an independent city in 1903, and growing exponentially in the first few decades after it consolidated with the City of Los Angeles in 1910, Hollywood has one of the highest concentrations of designated historic resources in the City of Los Angeles. The Proposed Plan area alone includes more than 150 Los Angeles Historic-Cultural Monuments (HCMs), representing about 15% of all HCMs in the city. The Proposed Plan area also includes several historic districts at the national, state, and local levels (called Historic Preservation Overlay Zones or HPOZs in the City of Los Angeles), including the nationally recognized Hollywood Boulevard Commercial and Entertainment District (Hollywood Blvd.).

22-1

**a. A map locating identified historic resources should be included and overlaid with development goals and land use changes in the Proposed Plan**

Identifying and locating historic resources is the first step in understanding how the Proposed Plan may impact these resources. Appended to the Proposed Plan is a list of HCMs as of an unspecified date, but no map accompanies the list. Maps illustrating locations of HPOZs and the California and National Register historic districts are included, but without benefit of overlay with land use changes or the Floor Area Ratio Incentive Area(s) put forth in the Proposed Plan. Inclusion of such graphic representations would greatly increase understanding of how the Proposed Plan will impact designated historic resources and districts, and facilitate development of more nuanced and specific planning tools to protect these resources.

As with any list of identified historic resources, a map would be ever-changing as new resources are identified and designated. We urge the inclusion in the Proposed Plan a statement similar to that found in the DEIR that the inventories of listed resources are constantly updated by the inclusion of new historic resources and should not be viewed as the single definitive register. An effective date of the inventories should also be included, as well as directions to contact the Planning Department for the most up-to-date information.

As a matter of accuracy, the DEIR includes a list of historic resources within the Proposed Plan boundaries that are in the National Register of Historic Places, but it appears several resources are mistakenly labeled with status code 1D as contributors to a National Register district when they are in fact 1S or individually listed in the register. This includes the Montecito Apartments, the Ennis-Brown House and the Lovell House, among others. We ask that the information is reconciled and corrected in the Final EIR.

**b. Potential historic resources identified through surveys should be included and mapped in the Proposed Plan/DEIR**

Hollywood has benefited from several historic resource surveys in the past, of which two are especially timely. The Community Redevelopment Agency of Los Angeles (CRA) updated its survey of the Hollywood redevelopment area within the Proposed Plan boundaries in 2009 and expects to finalize the results in 2011. Similarly, Hollywood is among the communities surveyed in Year 1 of SurveyLA, the first-ever comprehensive program to identify significant historic resources throughout the City of Los Angeles. Most of the Year 1 field surveys have been completed as of May 2011, and are being reviewed by the City's Office of Historic Resources.

Surveys are intended to help identify eligible individual historic resources and concentrations of contributing resources that might qualify as potential historic districts in the future. The data from CRA and SurveyLA exists and should be fully incorporated into the Proposed Plan and made available in a user-friendly format so that it is useful for long-term planning purposes and balancing preservation and development priorities.

The Proposed Plan should articulate – both graphically and in data form – a clear understanding of the survey results to better plan for preservation and development in the future. This information is critical as a starting point in identifying potentially significant resources. Similar to the identified historic resources, mapping the potential resources – and layering this with proposed land use -- will greatly aid this effort.

## **II. Additional clarity of the Proposed Plan’s impacts on historic resources is required**

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”<sup>1</sup> CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>2</sup> Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.<sup>3</sup>

Currently, the DEIR concludes that adoption of the Proposed Plan “could result in development projects affecting properties listed or eligible,” for the National Register, California Register, or designated as an HCM or eligible for inclusion or part of an HPOZ, and that “development incentives contained in the Hollywood Community Plan may spur increased development activity in certain areas that contain historic resources.”<sup>4</sup> However, no evaluation or technical report is provided to substantiate this conclusion. It is unclear which or how development incentives may increase activities in areas with historic resources, or what mitigation measures can substantially lessen or avoid adverse impacts to historic resources.

At a minimum, direct and cumulative impacts of height district, zoning, and plan amendment changes proposed for and adjacent to areas with identified national or local historic districts should be evaluated. For instance, the areas south of Hollywood Blvd are targeted for height district change that, according to the draft matrix of land use changes, appear to be an increase in FAR from 2:1 to 3:1, while the eastern end of the district at Vine Street is in a Regional Center with proposed FAR incentives and the ability to build up to a 6:1 FAR. The impacts of these changes on individual resources, as well as on the district as a whole, should be evaluated and mitigated as needed to plan for and direct development pressures away from historic resources. Alternatively, the Selma-Labaig Historic District appears to be targeted for downzoning to match the scale of the historic

<sup>1</sup> Public Resource Code, Sec. 21001 (b),(c).

<sup>2</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

<sup>3</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

<sup>4</sup> Los Angeles City Planning Department, *Draft Program Environmental Impact Report: Hollywood Community Plan Area*, March 2011, pg 4.9-27.

neighborhood, but some areas around it are targeted for removal of a plan footnote. The footnote is not easily found, and the impact of its removal is unclear.

The implications of these, and other proposed changes, as well as the potential to increase or decrease development pressures on historic resources should be fully detailed and evaluated in the EIR. Such evaluation should extend to individually listed resources as well as potentially eligible historic districts or concentration of resources identified by CRA or Survey LA. Nonetheless, a map with the land use and zone changes overlaid with identified and potential historic resources could pinpoint areas for additional study.

The Conservancy has concern that this base level of documentation and coordination with proposed planning and land use measures is not provided in the Proposed Plan. What is provided is insufficient, as it does not provide a coherent or user-friendly approach for determining how development will impact specific historic resources.

The Hollywood community, and the remaining built environment reflecting its early heritage, has been greatly impacted by development pressures in recent years, with many resources lost. The Proposed Plan should foster an appreciation for Hollywood's remaining historic resources and attempt to provide a fully transparent plan that guides and balances the need for carefully-planned growth as well as preservation.

### **III. The Final EIR should include at least one preservation alternative and mitigation measures that minimize or avoid adverse impacts on historic resources in Hollywood**

As previously stated, the Conservancy has concerns regarding the statement within the DEIR that development projects may affect historic resources. Again, without any substantive evaluation of these impacts, it is difficult to fully understand the Proposed Plan. However, given that there will be impacts, the DEIR should evaluate a "range of reasonable alternatives...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."<sup>5</sup> As a fundamental charge of CEQA, the DEIR fails in this respect and contains insufficient information to properly evaluate impacts and possible preservation alternatives.

With no preservation alternative included, the proposed mitigation measures generally only reiterate existing Planning Department policy. Additional analysis of potential impacts of the Proposed Plan is an opportunity to develop at least one feasible preservation alternative in the Final EIR, as well as mitigation measures with meaningful tools, incentives, and implementation strategies to direct development to appropriate areas.

Among a number of mitigation measures to consider is a transfer of development right (TDR) program specifically to protect historic resources most at risk from current or anticipated development pressures. This may be particularly important for Hollywood

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<sup>5</sup> State CEQA Guidelines §15126.6(a).

Boulevard., the anchor of historic Hollywood and a particularly fragile resource where past development pressures have already started to chip away at the cohesive nature of the boulevard and district. The proposed zone and height district changes for lots north and south of the boulevard, and in the Regional Center area at Hollywood and Vine, may direct development toward historic resources like the one-story contributors along Hollywood Blvd or the existing collection of multi-family housing north of the boulevard.

A TDR program that allows transfer or sale of unused air space rights from low-scaled contributors to adjacent lots that can accommodate additional development can effectively protect Hollywood Boulevard, if such transfers are linked to the protection and maintenance of the historic resources.

Another possible mitigation measure might be a provision to prevent preemptive demolitions that state no demolition permits shall be issued for identified or potential historic resources prior to the issuance of a building permit for a replacement project.

Other incentive programs could seek opportunities to link goals of the Proposed Plan to an appropriate reuse of existing historic resources, including

- Incentivizing studios to encourage employee housing in bungalow courts and other housing types originally constructed for studio housing, and adjacent to nearby studio employers.

This type of incentive program has been successfully implemented elsewhere, most notably with universities and colleges that encourage employees to support and reinvest in the surrounding community, while also maintaining a more walk-friendly community.

- Incorporating development and preservation with smart growth and sustainability principles. The reinvestment, reuse and “greening” of the existing building stock – including Hollywood’s historic and older buildings – is a fundamental of sustainable development that can improve energy efficiency, reduce carbon usage, and be employed to combat climate change.

#### **IV. Conclusion**

As the first updated community plan to be implemented, the Hollywood Community Plan will effectively set a standard for others to follow. We commend the City and the Department of City Planning for moving forward on this long-anticipated project. However, in regards to preservation, greater attention needs to be placed on clearly articulating current and eligible historic resources, possible impacts, preservation alternatives, and appropriate mitigation measures.

We urge the City to include a Historic Resources Technical Report in the Final EIR that correctly identifies and maps existing listed and eligible historic resources from the recent CRA survey update and SurveyLA.

Thank you for the opportunity to comment on the Draft EIR for the Hollywood Community Plan Update. Please feel free to contact me at 213-430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine  
Director of Advocacy

cc: Hollywood Heritage, Inc.  
Council President Eric Garcetti, CD 13  
Office of Historic Resources, City of Los Angeles

# La Brea Willoughby Coalition

*Save the Neighborhood!*

843 North Detroit Street Los Angeles, California 90046

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CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENTAL

June 1, 2011

Srimal Hewawitharana,  
City Planning Department  
Council District 5

**RE: Hollywood Community Plan DEIR/EIR No. 2005-2158  
LA BREA WILLOUGHBY COMMENTS**

## INTRODUCTION

**The La Brea Willoughby Coalition (“LWC”) is most concerned about subareas 39.3, 39.4, and 40, described further below, in the proposed update to the Hollywood Community Plan (“HCP”).**

The detailed descriptions of the subareas, proposed changes, with [City] document(s) pages and map figures are indicated/cited.

LWC corrections to the Draft EIR texts will be noted. Relevant supporting evidence is attached.

**Subarea 39:3:** Location boundaries: eastern half of block generally south of Romaine Street, east of Formosa Avenue, north of Willoughby Avenue, west of La Brea Avenue. Existing uses consist of industrial and retail commercial uses. Proposed changes to 3.25 acres are from Limited Manufacturing and MR1-1 (FAR 1.5:1) to Commercial Manufacturing and [Q]CM-2D (FAR 3:1) to amend the Plan and change the zone and height district to provide incentive for maintaining targeted media-related industrial uses and increase housing production.

**Subarea 39.4:** Location boundaries: both sides of La Brea Avenue [east to “alley”], generally between Romaine Street and Willoughby Avenue, [Bracketed portions repeat 39.3 and are not 39.4 areas. --extending west to include most of the eastern half of the block south of Romaine Street, east of Formosa Avenue, north of Willoughby Avenue, west of La Brea Avenue.] Existing land uses consist of retail commercial and industrial. [4.45] acres would change from Limited Industrial and MR1-1 (FAR 1.5:1) to Commercial Manufacturing and [Q]CM-2D (FAR 3:1) to provide incentives for maintaining targeted media-related industrial uses and increase housing production.

Description p 4.1-33 (DEIR, p 94). Map figure 4.1.8 (DEIR, p 95).

Appendix A-5 Draft Matrix of “Existing and Planned Land Use,” p. 88.



**Subarea 40:** The LWC is most interested in Willoughby to Romaine; La Brea “alley” to Highland. This site would have its zone changed while retaining the existing land use designations of Commercial Manufacturing. There are existing multiunit residential dwellings on Willoughby from Sycamore to Citrus.

Description: DEIR, p 4.1-35, Map Figure DEIR, p 4.1-9.  
Appendix A-5 Draft Matrix of “Existing and Planned Land Use,” p. 89.

### **LWC REQUESTS AND RECOMMENDATIONS:**

The La Brea Willoughby Coalition has long been actively involved in development of the Hollywood Community Plan Update. This opportunity for community input into its local area(s) is welcomed.

LWC requests the following:

- 1) **No zone change of industrial land, subareas, 39.3 and 39.4** (to include La Brea/Willoughby-Formosa/Romaine, except for the La Brea Gateway project, and La Brea east side to alley), **maintain the current FAR, and implement a height limit of 45-feet as transition to the residential neighborhood. Develop a streetscape plan for La Brea. Prohibit billboards, digital displays, supergraphic signs, and all off-site signs as defined in LAMC 14.4.2.**
- 2) **In Subarea 40**, the LWC addresses the area of Willoughby to Romaine, La Brea “alley” to Highland. There are many existing multiunit residential dwellings along Willoughby from Sycamore to Citrus. This area would have its zoning changed while retaining the existing land use designations of Commercial Manufacturing. **LWC requests height limits of 35-feet to make suitable transition to residential areas south of the subarea with its established height limits.**

### **LWC COMMENTS ON THE DRAFT EIR:**

This process gives opportunity for more needed attention to address the community/neighborhood goals/input.

**The Summary Paragraph from the DEIR: The proposed Plan would allow infill development consistent with existing and proposed land use patterns, intensities, and building types. The proposed plan conserves the majority of the area's existing patterns and intensities of use. The proposed plan would allow increased density and or mixed uses in specific, primary commercial areas. In these locations, more intense land uses could potentially result in larger, higher buildings, more dense development and a larger daytime population than is currently permitted in the existing community plan.**

23-1  
cont.

23-2

23-3

**The LWC finds the DEIR works to justify the Plan's proposed changes as stated above. The Plan policies-- and the DEIR summary was reached though many problems and downsides of proposed policies/changes have been ignored and/or not identified. Excessive density impacts were not adequately addressed in each DEIR chapter, therefore solutions, mitigations and alternatives not addressed. For example, potential and cumulative impacts of noise, traffic in any land use changes have been ignored.**

23-3  
cont

Likewise, the Vision Statement 2030 is vague to the point of meaninglessness. It does point to change and that change includes unlimited density without factual or logical justifications.

There is no monitoring programs for existing Community Plans to determine where or what needs to be changed? What worked?

23-4

Some information is outdated or erroneous. Just one example, the LWC neighborhood is now in the Wilshire LAPD, not Hollywood. That section will not be addressed in these comments.

23-5

The DEIR simply compiles a list of infrastructure policies and programs. Actual infrastructure in the City has not been identified or measured since 2000. Therefore an analysis of the CPA infrastructure capacity, infrastructure gaps, and analysis how the relationship between these two factors will change during the lifetime of the updated Community Plan, from 2010 to 2030 is not possible.

23-6

For example, not measured, monitored, or analyzed are the assumptions for the policies and standards for the provision of an adequate transportation system. The DEIR states the following, but has no implementation policies:

(1) Specification of a local accessibility plans that:

-- assesses the mobility and accessibility needs of community residents, including access to work opportunities, unmet transit needs, access to essential services, and access to regional line-haul transit services; determines the community's current highway and transit accessibility levels;

-- revises citywide accessibility standards as needed to address unique community problems and issues; identifies actions to achieve the desired level of accessibility; -- and includes measures intended to preserve the existing character of conservation areas while also maintaining and enhancing accessibility within these parts of the City.

23-7

(2) Definition of neighborhood traffic management strategies to protect residential areas from the intrusion of traffic from nearby developments and regional traffic.

(3) Identification of highway segments by user priority (pedestrian, transit or other vehicle) [see Chapter 5:Urban Form and Neighborhood Design and Chapter 8:Transportation].

## 1. Land Use

**Previous LWC recommendations (Attachment 1) to Department of City Planning (“DCP”) act to safeguard and preserve neighborhood vitality and character and to underpin HCP stated policies to “serve and preserve the neighborhoods.” The LWC supports the current industrial zone, with the current FAR, but requests the only change be the implementation of a height limit of 45-feet to maintain heights consistent with scale and character of the adjacent residential areas.**

23-8

The updated Hollywood Community Plan (“Plan”) intends to adopt the Hybrid Industrial Incentive “Q” Condition which states:

Residential uses shall only be permitted if a project incorporates a minimum FAR of 0.7:1 targeted media-related industrial uses, including: film, tape, television, video, internet and other media production, editing and reconstruction; film archiving, storage and exchange; studio equipment manufacture, rental and storage; music, film, television and internet publishing; sound recording; broadcast studios; facilities for the development of software and other computer and media-related products and services.

The Plan purports to “encourage/support large, more dense projects and zones” (DEIR, p 4.2.6).

The “Zone/Height District Changes” states “ ... in addition to land use designation changes, several other parcels of land would have their zone and/or height districts changed to provide incentives for housing production,,to increase housing capacity... to maintain height consistent with scale of existing and/or adjacent residential areas... (DEIR, p 4.1-9).

The Plan claims more residential housing and incentives are necessary to accommodate the greater growth to meet population, housing, employment forecast for 2030 (SCAG estimate). It is deemed required to avoid “unreasonable overcrowding,” and “adversely affecting affordable housing.” (DEIR, P 4.2-3).

These statements made in the DEIR are false as the data shows there is no need for more housing in this area, nor is there a need to accommodate greater growth. As the U.S. Census data (inserted and attached below) shows, people are LEAVING Los Angeles for more livable cities with better quality of life. The SCAG estimate is not based in reality, and in fact, as the U.S. Census data evidences, the vacancy rate has increased since 2000. Hence, as more units have come on line, there has not been a corresponding increase in population growth. Instead, the vacancy rate of residential units has increased.

The DEIR exhibits a general lack of factual foundations, poor analysis, lack of solutions, and weak mitigations for reducing land use impacts resulting from this proposed update to the Hollywood Community Plan. There is no rationale for upzoning this area and in fact the census population counts directly contradict the DEIR’s justification for upzoning.

The following Plan maps (attached)

- 1) Draft Land Use and Zone Change, Plan, figure 3.2c;
- 2) Media District Industry Retention Area, Plan, map 13, and
- 3) Hybrid Industrial Areas, Plan, map 30 will clearly demonstrate:

1) The La Brea/Willoughby-Formosa/Romaine industrially zoned subareas 39.3 and 39.4 are currently zoned MR1-1, which is Restricted Industrial except for the recently approved (zone change) La Brea Gateway mixed-use project. There are no height limits, but the FAR is 1.5:1, which seriously limits how massive a project can be. It can be as tall as they want, but the building would be very narrow. The adjacent Commercial lots are zoned C4-1VL, which limits projects to 3 stories (or 45 feet if used for residential) and FAR of 1.5:1. The residential area (south of the block) is zoned [Q]R3-1XL, which limits buildings to two stories or 30 feet.

The block is surrounded by industrial and commercial-manufacturing zones. On the east is a concrete plant and the west, high tension wires. Romaine (to the north) is the City of West Hollywood border and immediately presents a blank wall of a parking structure and a concrete plant to this block.

2) It has been claimed this is the “only industrial block west of La Brea,” but this block is contiguous with the media/industrial zones from Western west to La Brea, La Brea south to Sunset, and that continue west into West Hollywood studios to Martel.

3) To propose “hybrid residential” of mixed residential in the same structures with industrial projects, as this proposed Plan update does, flies in the face of reason and all good land use planning. We assert if one moves into in such a “residential” area that is clearly industrial--or vice-versa--occupants are more likely to move more quickly than if in an explicit zone. This “hybrid” will promote highly transient business and residential occupancy and a highly unstable community.

#### **A. Industrial Land (“IL”) Use**

Industrial areas have been sought by developer interests for mixed-use/residential project on low(er) cost industrial land. This is in opposition to the CRA/DCP Industrial Land Use Study/Report (“ILUR”) January 3, 2008 memo (attachment #3) which advocates protection and preservation of diminishing industrially zoned land.

This memo, page 1, states:

“The City’s adopted policy is to retain industrial land for job producing uses.”

It continues: Industrial land is “...essential component of the City’s diversified economic base. The industrial vacancy rate in Central (sic) Los Angeles is less than one percent, by far the lowest of any major metropolis in the nation.”

The HCP DEIR states “industrial land use goals, objectives, and policies reflect the need to provide sufficient land for light industrial uses with employment opportunities that are safe for the environment and workers, and which gave minimal adverse impact on adjacent uses.” (DEIR p 2-6).

It continues, “These goals, objectives and policies seek to retain existing industrial uses and promote future development, especially in entertainment and high technology applications, which contributes to job opportunities and minimize environmental impacts, designate and preserve lands for the continuation of existing industry and for the development of new industrial parks, research and development uses, light manufacturing, and similar uses, and encourage compliance with environmental protection standards and health and safety requirements through the enforcement of environmental protection standards and health and safety requirements.

“They [Plan goals, objectives and policies] encourage new industrial development designs to be compatible with adjacent land uses, seek to buffer residential/industrial land uses, and promote a transition of industrial uses, from intensive uses, in those areas in close proximity to residential neighborhoods. They promote light industrial uses and accompanying employment bases in location that are in close proximity to public transportation facilities and are compatible with surrounding land uses. (DEIR, p 2-7, p 4.1-7)

Contrary to the DEIR’s representations, the Plan for subareas 39.3 and 39.4 proposes zone changes from industrial land to “hybrid residential.” Thus, the DEIR fails to address the inconsistency between the stated policies and goals and the proposed zone changes. Instead, it appears the goals of the HCP are to increase residential density of designated portions of the plan area, NOT to preserve industrial zoned land and industrial job base. (Plan LU.2.28 p 83, map 28) . This Plan to “encourage large, commercial, residential and mixed used projects within walking distance to metro station(s)” (Plan, p 109), sets these projects as goals, but the DEIR has not logically determined, justified the needs for upzoning.

23-9  
cont.

Existing land use in the Community Plan Area (“CPA”); Of the 292 acres (1.8% of the CPA) designated as Industrial (DEIR, p 4.1-1, 4.1-4). The predominant land use is residential or 43% of the CPA. There is already a dearth of industrial land in the CPA. Yet the Plan proposes a [further] decrease of 13.6 acres of industrial land in CPA (DEIR, p4.1-8). Subareas 39.3 and 39.4 constitute 3.25 acres of vital industrial land.

23-10

Thresholds of Significant Impact Assessment cite if:

2. “...substantial change in the residential density and commercial development intensity of an area as a result.
3. “... substantial increased potential for land use conflicts and nuisance relationships between existing and future land uses as a result.
- 4.” ... substantial existing developed area would be converted from a residential use to non-residential use over time or vice versa as a result. (DEIR, p 4.1-4)

The finding of all the above significant impacts and the known consequences of the proposed zone change clearly cannot be mitigated to a level of insignificance. The City ILUR declares the undeniable and irreparable critical effects of permanent losses of industrial land and industrial jobs. This is especially untenable to LWC for the specific benefit of residential development projects in the face of the clear lack of need of such increased intensity of land use.

The DEIR has been found sorely lacking substantiation of Plan goals through factual studies and analysis of the loss of industrially-zoned land, and the purported need for more residential housing. Even the policy's purported economic/jobs framework is undermined by the proposed changes to industrial land use. It seems more intent to promote and benefit specific mixed-use and residential projects/developments. The guise of "hybrid residential" doubles the FAR from 1.5 (IL) to 3.0, with "if 0.7 use for industrial use/media related use" clearly does not promote, establish, or maintain stable industrial nor stable residential occupancy within the same projects.

### **1. Other Impacts from Industrial Land Loss not addressed in the DEIR**

- Such losses result in permanent zoning of higher paying industrial jobs with subsequent decrease of industrial land tax base(s).
- The erosion of industrial land takes away ability to provide enough square footage to consolidate manufacturing base/location to maintain an industrial base.
- The entertainment industry needs smaller related/supporting industries, e.g., for the "Lot" (on Santa Monica Boulevard at Formosa) studio sound stages, editorial services, mixing stages, screenings. Or they will move to Burbank and other locations.

The City of Los Angeles has too long relied on construction starts to supply the majority of local jobs. To replace perfectly good industrial jobs with retail/housing, and then encourage industrial jobs somewhere else is ecologically and financially unsound. The best "Green" building is reuse of existing resources, not to tear down and rebuild "Green."

The US and local economy relies on two things, Consumer Spending and Housing Construction. Dependence on these two factors is much more damaging and wasteful than our reliance on fossil fuels. The LWC promotes more adaptive reuse and green technology developments in the urban core in order to move forward. To that end, LWC opposes the updated HCP because it fosters more "bedroom communities" than holistic long-term jobs/housing balance.

### **2. Further Assessments and Considerations:**

1. The Plan intends to change 10.99 acres (includes other CPA subareas) of industrially zoned land to another use. This land may contain hazards materials due to its current use, and therefore could cause an increased risk of exposure to hazards as a result of the changed land use and/or zone.

23-10  
cont.

23-11

23-12

2. The EIR must identify possible options for economic development of a lasting nature and make recommendations to assist in the most favorable economic development possible. Cost/benefit analysis of industrial-based v retail and residential entities must be conducted.
3. The EIR must analyze those parcels where the Hybrid Industrial Incentivē “Q” Condition is being proposed. Appropriate measures must be adopted to mitigation any potential and cumulative impacts of proposed zone changes.
4. A concern raised is the increase in density envisioned by the new HCP will eliminate requirements for parking, open space, landscaping, dedications, without notice, hearings, etc. for “by right” development projects must be clarified.
  - We look to “reasonable, expected population and housing needs” (plan, p 50)
  - To [truly] preserve our viable neighborhood and jobs (plan, p 54)
  - Provide walkable, open space (plan, p 54)
  - [Ensure] adequate public infrastructure for Plan/changes (plan, p 54)
  - Well-designed transitions in/of heights (plan, p 55) design and scale (plan, map 19) to residential neighborhoods to maintain existing desirable neighborhood features

### **Unavoidable Significant Adverse Impacts**

With more accurate assessment and implementation of the appropriate mitigation measures, impacts would be less than significant.

The City has failed to comply with its General Plan, as it has not produced annual reports on growth and infrastructure since 1998. Crucial current status and future needs of infrastructure measures have not been made and therefore cannot be mitigated.

The policy and DEIR state “development will be based on infrastructure,” but the DCP planners give only the [Hollywood] subway as new, improved infrastructure.

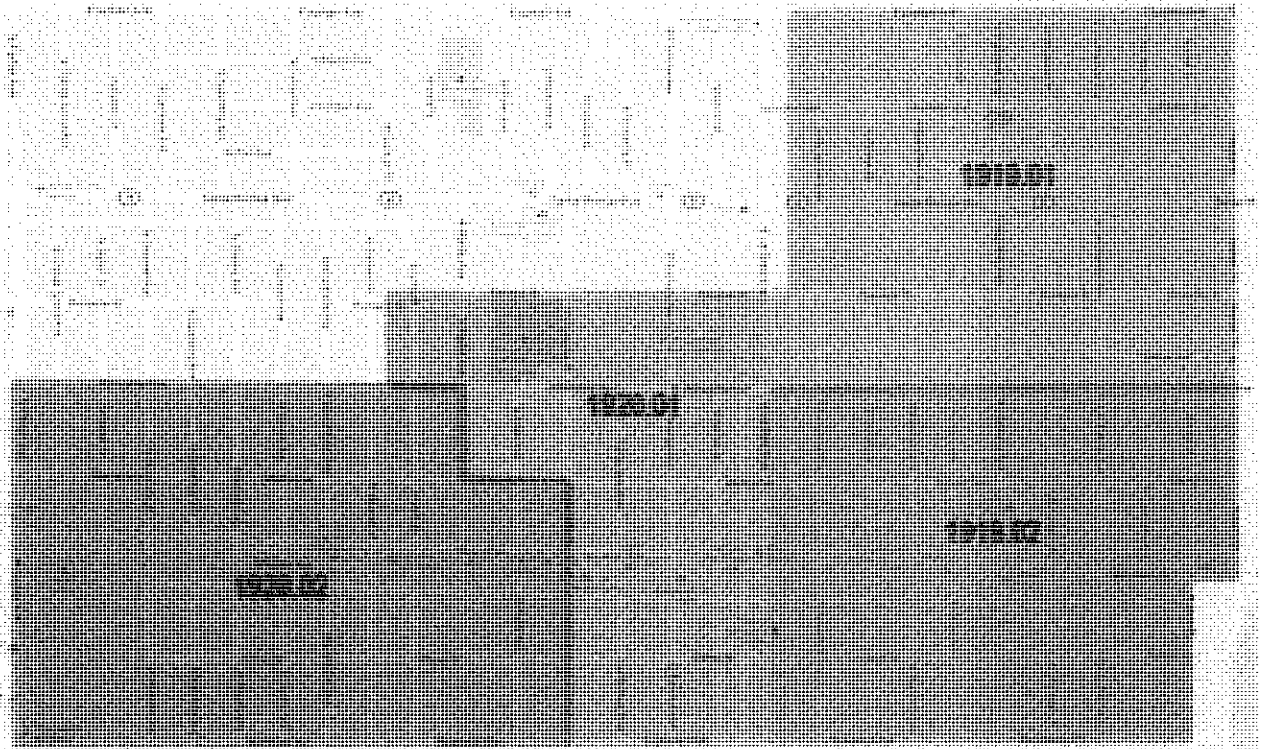
Predictable, cumulative impacts of proposed zone changes have not been addressed.

Vague terms, eg, “may require, encourage, estimated, anticipated, likely to be needed” do not give factual basis for plan. Nor for adequate public review and comment.

## 2. Population, Employment and Housing

The LWC asserts present zoning supports the capacity of present and trending future population numbers, employment, and housing needs. There is no need for “upzoning” and higher density.”

### La Brea Willoughby Coalition Neighborhood Map U.S Census Bureau Tracts 1919 and 1920



<b>1920</b>	<b>1919</b>
North: Willoughby to Romaine	North: Fountain
West: Fairfax	West: La Brea
South: Rosewood	South: Rosewood
East: La Brea	East: Seward

The above image is the U.S. Census Bureau’s thematic map used to segment the collected census data. The image above display’s two spate tracks marked 1919 and 1920, which correspond to the La Brea-Willoughby neighborhood in the Hollywood area of Los Angeles. The blue highlighted area shows the 1920 tracts while the red highlighted area shows the 1919 tracts. Tract 1919 and 1920 are further divided up into two halves which are marked 1919.01;1919.02 and 1920.01;1920.02 respectively.

Recommendations in the Plan may not be appropriate or necessary. The DEIR use of SCAG population projections to 2030 is inaccurate. The Plan is based on “estimates,” “assumptions,” and “anticipated” population growth rather than actual trends reflected in recent Census data.

\*Actual (v estimated) census figures in comparison matrix for census tracts (“CT”) 1920 (w/o La Brea) and CT 1990 (e/o La Brea) are below.

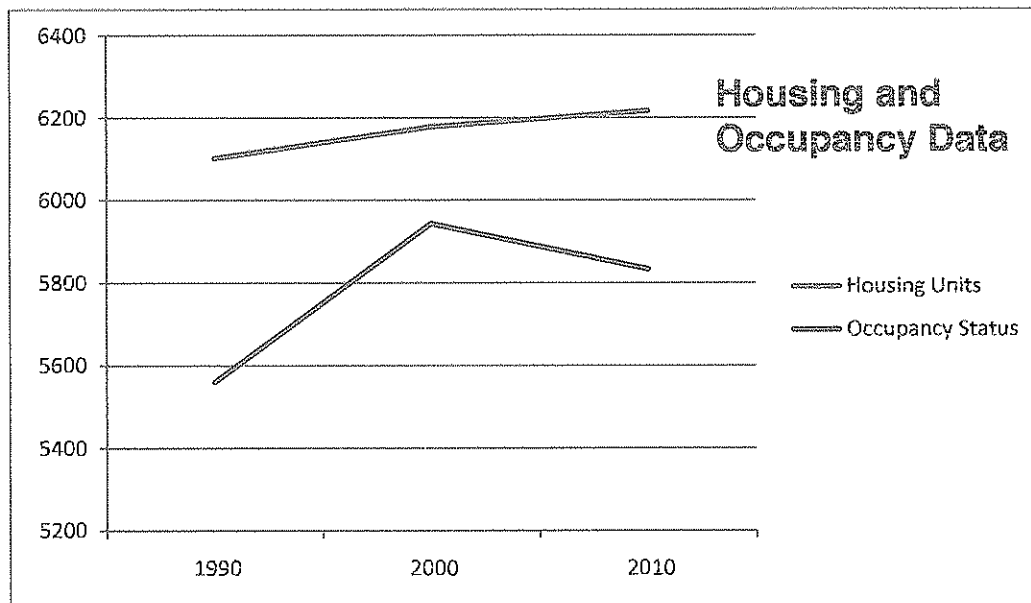
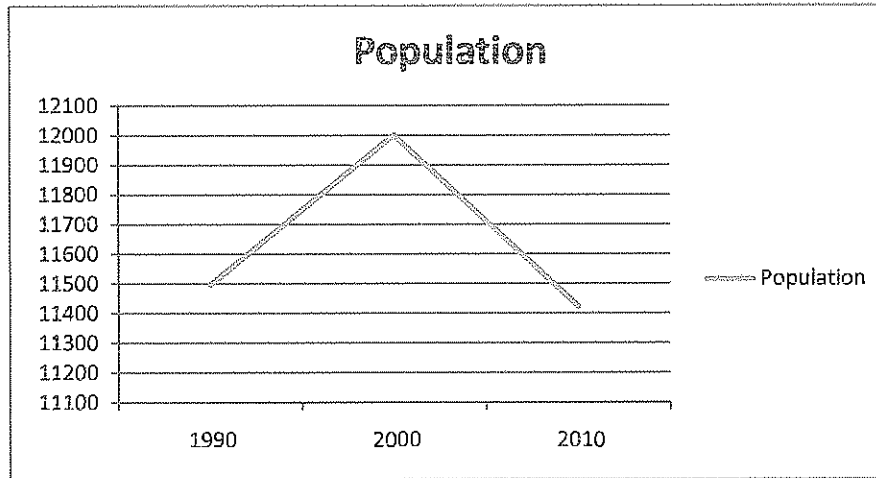
\*The equation will include years 1990, 2000, and 2010. Indices will include population, employment, housing, and unassisted



Source: U.S. Census Bureau  
 Census Data for Years 1990, 2000, 2010  
 Census Tracts 1919; 1920  
 La Brea Willoughby Coalition Neighborhood

**Total Population, Housing Units, Occupancy**

	1990	2000	2010
<b>TOTAL POPULATION</b>	11,496	12,001	11,423
<b>HOUSING UNITS</b>	6,102	6,178	6,217
<b>OCCUPANCY STATUS</b>	5,560	5,943	5,833
Percentage vacant:	9%	4%	6%



23-12  
 cont.

From 2000 to 2010, the vacancy rate increased from 4% up to 6%. This clearly demonstrates the demand for housing stock in this area has gone down. In addition, during the same period, the areas in question have sustained a 5% decrease in population (in 2000 population was 12,000, in 2010 it was 11,420). This substantial population decrease indicates that people are finding other neighborhoods in the region more desirable.

Yet, the proposed HCP assumes outdated, and in this case, substantially inflated growth rates. This is what is called bad city planning in which the zoning is ramped up to serve this imaginary population, while the city's infrastructure and services have been so decimated they cannot even serve the existing or even declining population. Increasing allowable density in neighborhoods that have thoroughly documented increase in vacancy and decrease in population is bad planning. Rather than unnecessarily expend precious resources on up-zoning these areas at a time when the city is struggling to remain solvent, the city should invest these resources in sorely needed infrastructure improvements and baseline maintenance.

The Planning Department brief analysis of these trends, about two pages in Chapter 2 of the draft HCP, offers little counter data to this chart. It indicates the estimated current population, which is dated 2005, is 224,426, and the projected population in 2030 will be 244,602. In other words, even though subsequent to the 1995 Framework estimates, Hollywood has had a CRA project, mass transit stations, many land use entitlements, and much direct assistance to developers in the form of loans, grants, and fee waivers, Hollywood's 2030 population will still be 12,000 people short of what the Framework predicted in 1995 for the year 2010, without any of the upzoning or upplanning called for in the Hollywood Community Plan Update.

23-12  
cont.

"SCAG's 2030 forecasts for Los Angeles are based on historic and recent growth trends and are allocated to each of the thirty-five Community Plan areas in this way. The Planning Department further refines the allocations so that projected growth is directed in a fashion that is consistent with the Framework Element and other City policies. For example, the Framework Element directs development to certain areas, such as regional and commercial centers, and protects or directs development away from other areas, such as single-family and other residential neighborhoods. The 2005 estimate and SCAG's 2030 projected adjusted population, housing, and employment for Hollywood are shown in Table 2-1 below.

### **[CPA] Projected Population, Housing, and Employment**

	<b>2005 Estimate</b>	<b>2030 Projection</b>
Population	224,426	244,602
Employment	100,980	119,013
Dwelling Units	102,039	115,694

Source: SCAG, *City of Los Angeles DCP* (Plan, p 34, Table 2-1)

**[CPA] Population, Housing, and Employment Data  
 Capacity Existing (1988 HCP) Plan, Estimate 2005**

**CPA Census  
 Population**

	Existing HCP 2010	Estimate 2005	SCAG 2030	year	Census
Population	235,850	224,426	244,602	1990	213,912
Employment	108,722	100,980	119,013	2000	210,824
Dwelling Units	105,782	100,600	113,729	2010	**

Source: *City of Los Angeles DCP* (DEIR, p 4.2-6, Table 4.2-2)

Source: US Census

The housing statistics also present the same story. Updated estimates the CPA had 100,600 housing units in 2005, similar to the Planning Department's estimates of 102,629 in 2008. The HCP predicts 113,729 housing units for 2030, or 4,000 less than the Framework predicted for the year 2010.

Clearly the growth trends in the CPA are much lower than predicted in 1995, which should translate into down-zoning and down-planning, not its opposite, in the year 2010.

LWC requires the DEIR disclose the actual census population of the entire CPA for 1990, 2000, and 2010. Please put this information into graph form with a map of the area.

In the decade of the 1980's, Los Angeles's annual growth rate was about 2 % per year, the basis for the General Plan Framework Element. The city's growth rate has now slowed to .25 % per year, and in most of Hollywood, there was actual population decline. Yet, the proposed HCP assumes the City's former growth rates from 30 and more years ago will return and continue ad infinitum in the CPA. This is what is called bad city planning in which the zoning is ramped up to serve this imaginary population, while the city's infrastructure and services have been so decimated they cannot even serve the existing or even declining population.

There is no evidence the CPA and the Census Tracts addressed by LWC had such an expansion of population or increased housing need since the Framework was adopted in 1995 to require any up-zoning or up-planning because of local growth. More specifically, the current Framework predicted the CPA population would reach 257,000 by 2010. The Plan update states the CPA population will be a little above 240,000 by 2030, yet it still calls for massive upzoning and upplanning.

LWC does not find any rationale for these proposals, such as a clear demonstration the CPA once had the capacity for 257,000 people based on existing zoning and plan designations, but now requires a major expansion in zoning capacity to accommodate a much lower number of people and housing units. The Plan does not present a very logical or consistent argument to justify . It is also is quite a stretch to argue this is the local application of the General Plan Framework, when it flies in the face of the Framework's intent, goals, and policies.

## The General Plan Framework

Implementation of the General Plan Framework through the update of Community Plans must follow the broad guidelines for implementing the Framework presented in the City Charter. Section 556 of the Charter is to ensure General Plan consistency and conformance with all applicable provisions of the Los Angeles Municipal Code (LAMC).

**There is no evidence the General Plan Framework implementation through the HCP justifies any upzoning or upplanning. There is no basis for claims the draft HCP update is consistent with the General Plan Framework, and there is no rationale why any findings which make this claim should be accepted.**

23-13

### General Plan Framework Element's Growth Neutrality Policies:

**The purpose, intent, and provisions of the General Plan Framework are clear. As the City of Los Angeles's adopted planning document, the General Plan Framework Element is expressly a growth neutral document. This means it is not a slow, or no growth policy document, nor a pro-growth policy document. As explained in detail through the General Plan Framework Element, growth neutrality means two things:**

*"There should be a documented need for growth to justify increased density through changes in plan designations and zones. Assuming other legally required findings can be made, such up-planning and up-zoning must demonstrate documented growth to be consistent with the General Plan. Conversely, if there is no documented need for growth, such as a housing shortage in a local community, then the proposed community plan update would be growth inducing and therefore not compatible with the General Plan. This means that Community Plan updates intended to promote growth to reach a growth target would not be consistent with the General Plan.*

*"Growth neutrality also means that any proposed up-planning and up-zoning must be compatible with the capacity of public infrastructure, such as circulation and parking. As mentioned, I had anticipated that the recently released Chapter 5 would address this topic, but could find no references to existing infrastructure capacity or existing and projected user need."*

**To better understand the concept of growth neutrality, it is worthwhile to review the exact language of the General Plan Framework. The answer to this question of General Plan consistency is straight forward, as indicated by the following selections from the General Plan Framework Element, which indicate that the General Plan has been designed to respond to growth, not promote it, and that projected needs for additional commercial capacity can well be met within the city's existing zoning and plan designations:**

**EXECUTIVE SUMMARY:** "The Framework Element does not mandate or encourage growth."

"The City is not promoting... population growth. Rather, pursuant to conformity requirements, it has developed this Element to establish policies to best accommodate this growth when and if it should occur."

**LAND USE:** “The primary objectives of the policies in the Framework Element's Land Use chapter are to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, centers and boulevards and industrial districts particularly in proximity to transportation corridors and transit station.”

**INFRASTRUCTURE AND PUBLIC SERVICES:** “Maintain an adequate system/service to support the needs of population and employment. This encompasses the upgrade and replacement of existing facilities as they deteriorate as well as the expansion of facilities/services to accommodate growth.”

**IMPLEMENTATION PROGRAMS:** “Establish master plans for infrastructure and public services to upgrade existing deficiencies and meet the needs of future growth.”

**CHAPTER TWO: GROWTH AND CAPACITY:** “The theoretical capacities of the existing general plan at buildout, as shown in the Framework Element technical reports and Environmental Impact Report, are adequate to accommodate growth to the year 2010. While its housing capacity is more constrained than commercial and industrial uses, the Plan's capacity for growth considerably exceeds any realistic market requirements for the future. For example, there is sufficient capacity for retail and office commercial uses for over 100

years even at optimistic, pre-recession, market growth rates. At the same time, the impact assessments of the current general plan indicate that if all lands were to be developed with the uses at the maximum densities permitted, an unrealistic jobs/housing relationship would result and supporting infrastructure and public services would be unable to support this level of growth.

**CHAPTER THREE: LAND USE:** “The City's commercially-zoned corridors, districts, and centers have the capacity to accommodate growth that considerably exceeds economic market demands well into the 21st Century. While densities at a 1.5:1 floor area ratio (FAR) are generally permitted, existing development averages approximately 0.58:1 and market demand forecasts indicate increase of only 10 to 15 percent.”

### 3. Public Schools

The Los Angeles Unified School District (DEIR 4.3-22-36) gives existing sites, capacities, and plans. There no measures of education goals, achieved, or otherwise than the lists of schools.

The DEIR's statements on decreased student population and therefore no additional LAUSD capacity is needed are below:

*“The most salient data demonstrated in all sites/the numerous charts is the significant decline in enrollment from 2007/08 to 2008/09. Again the 2030 “anticipated” student populations numbers is proposed. The statement, “However since the actual student enrollments are below operating capacities (by 10% to about 20%)”, ...assumptions are “existing operating capacity of public schools have the potential to be sufficient to accommodate the increase in the student population under the Existing (1988) Plan in 2030.” (DEIR, p4.3.35).*

23-13  
cont.

23-14  
cont.

**Again the decline in the CPA population across all demographic groups, including students, must be considered in all plans and programs.**

#### **4) Public Services**

The DEIR frames "Public Services" elements eg, fire, water, traffic, transportations, waste water, solid waste, etc without calling it "infrastructure," though these elements are variables in the Annual Growth and Infrastructure Report (which has not been produced by the City since 2000).

**The LWC calls it what it really is and what which needed to guide and support Plan changes-- or not: Infrastructure.**

**The HCP cites**

**"...adjusts the population capacity of the CPA by modifying land use designations, heights districts and zones to accommodate this expected population increase. These changes are guided by the General Plan Framework...which contain infrastructure to support increased density." (DEIR, p4.1-5)**

CF.5.18 states "Coordinate [these public services]... during review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands." (DEIR, p 4.3-4)

The variables are described and assumptions made, also criteria has been "established," but no factual information or cumulative impacts [to all public services] are given based on the Plan's proposed changed zoning and higher density. For example, after the basic definitions and locations of fire services and stations, the "Impact Assessment" of proposed HCP states (CF 5.18): "Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments to determine the impacts on service demands."

The assessment continues" Implementations of the Plan could result in increased development in increase development...could require upgrading or improvement of existing... infrastructure."

Section 4.1 (proposed land use designation changes and anticipated impacts) cites:

"...any changes in land use designations that would allow a substantially greater housing density could require an unplanned upgrading or improvements of existing... infrastructure to accommodate future development. This could result in a significant adverse impact to...[fire, all public services] protection services." (DEIR 4.3-5).

Lack of factual report(s) of crucial infrastructure have been neglected, measures have not been made, and therefore all factors/policies cannot be adequately assessed and mitigated.

All aspects of infrastructure necessary to support the existing and proposed, increased population, housing, and business must be determined. These measures include, but not limited to adequate

water supply to the city as a whole as well as water mains to the HCP area, sewage removal and treatment, electric and gas utilities at an affordable cost, transportation, parking, and schools.

Further, there is no clear path defined as to who implements these policies or more importantly pays for them. Relying on policies does not insure mitigation.

With the development assumptions made in this document, Hollywood would require additional police and fire protection, and response times are increased due to the increase in traffic (and population). Additionally (and sadly) Hollywood will require an additional 60,000 square feet in library space to accommodate the planned growth.

## 5. Water

If we can water our lawns and gardens only 24-minutes a week, how can there be enough water for all these new, dense developments?

The DEIR (p 4.4-2) notes various significant decreases in water to the City. This includes decreased water deliveries through the Los Angeles Aqueduct ("LAA") due to extended drought, water reallocation for environmental mitigation and enhancement in the Eastern Sierra, and other water sources/supplies factors.

Between 1970 and 1986, LAA water deliveries provided for more than 75% of the City's water supply. From 2001 through 2004, only 34 % City water came through the LAA.

Water consumption acre-feet-per year for 2006-7 is Residential 71%, Commercial and Governmental 26%, and Industrial 3%. The Plan states "plenty water for expansion...might require upgrading local distribution systems...: (plan, p 132.)

The simplistic statement is "[D]espite concerns about ongoing water shortages and higher costs, [MWD has pledged] to plan for emergencies and natural disasters." But what is the plan? DEIR, p 4.4-3 optimistically states "Local groundwater will provide the City with a reliable, steady source of water."

If the increased density goes forth as planned, the demand for water quantity would increase. Along with decreased deliveries, increased imported water will also continue to be a major challenge and significant adverse impacts for the City.

### Unavoidable Significant Adverse Impacts

**Note: "the City of Los Angeles is faced with the challenge of providing a sufficient supply of safe, reliable, and affordable water to a growing population and business sector, while at the same time, dealing with the realities of the availability of water resources. Implementation of the Proposed Plan policies and the proposed mitigation measure (appropriate expansion, upgrade and/or improvement of the local water distribution system within the CPA as may be necessary to accommodate anticipated growth) would reduce the impacts of the Proposed Plan. However, given the uncertainties in the water supply horizon and in capacities of local delivery systems, impacts to water are considered potentially significant. (DEIR, p4.4-9)**

## 6. Utilities

No fault, no significant impacts or required mitigations in utilities was found in DEIR.

This shows shoddy analysis with no mitigation need noted for essential, such as

- Storm water Management and
- Other infrastructure utilities.

## 7. Transportation/Circulation

**Major Public Transit Corridors, Map 11, p 44 (LWC area attached) of HCP does not show any “transit oriented” in the LWC area. The LWC requests definitions to be clearly made and consistently used throughout all Plans and documents of “Transit corridors,” “transit nodes,” and “transit rich.” Subway route or stop? Bus route or stop? Bus type? Frequency (actual times, not what MTA schedule states). Future plans and implementation are bases for some policies--not current or actual transportation modes. What is “Metro?” It is used as subway and then bus system in different citations.**

Policy (p 13): Plan protect the district’s valuable historic resources and establishes programs to integrate the **emerging land uses with the area’s rich transit infrastructure.** [LS bolded.] **Please fully define this “transit infrastructure.”**

There is no identification of impacts, therefore no transportation mitigation due to the proposed up-zoning and increased density. This section does not specify how transportation will be improved, eg, routes, times, etc, or the present public transit cutbacks, rate increases, etc, impacts on the Plan.

Every street has a designation and standard. See “Existing Roadway Designations” map--figure 4.5-1 (DEIR). Sidewalks must be maintained for walkability. Streets will not be widened or re-designated.

In LWC area, please note primarily “local” and “collector” streets--already congested and difficult for 2-”typically-” sized vehicles to pass each other already on these narrow streets.

“Cut through traffic” is already a primary problem in the overburdened LWC local streets. Policy, p 160 claims “cut through only in Hollywood core.”

LWC calls for traffic studies in LWC area to demonstrate adverse, cumulative impacts of the proposed changes.

### **Other problems include:**

- Gross misconception: People who live near transit stations will use subways and do not need cars. Most current studies demonstrate transit stations and routes near workplace(s) are more likely to promote greater use of public transportation by all demographic groups.

23-17

23-18

23-19



- Traffic noise from pass through traffic
- Excessive honking – possible horn ordinance
- Excessive noise from Car Stereos and Motorcycles – LAPD jurisdiction

23-19  
cont.

## 8. Air Quality

The policies of the Plan do not require the City to meet any standards, and instead only speaks of private development. The City should seek to implement its own climate policy, ClimateLA.

A density increase adjacent to neighborhoods results in exposure of sensitive receptors to substantial pollutant concentrations.

### **Further Analysis and Mitigation:**

1. The EIR must analyze the policies and strategies of ClimateLA and the City must fully implement those actions which are under the purview of the City and are related to the Hollywood CPA, by 2030.
2. Mitigation measures should not be tied only to those going through discretionary action, but instead to the size of the development, i.e. residential projects over 5 units or commercial projects over 10,000 sf or which generate 42 trips. These numbers are arbitrary so the EIR should analysis the appropriate threshold and then require mitigation for those projects which exceed the threshold.

23-20

## 8. Noise

The DEIR states there will be various impacts of noise, from construction, traffic, etc., but then kicks the issue down the field into the future by saying the impacts will be addressed under subsequent CEQA documentation for individual projects proposed.

It then states there will be construction noise impacts from cumulative projects and recommends some standard mitigation measures for construction equipment and techniques, which is a little weak. Planning, et al have always missed the mark by only looking at one project at a time and not factoring in everything being developed within a neighborhood or area. So other projects proposed or underway within a certain radius should affect one another and made to have staggered construction.

23-21

For traffic noise, the DEIR states there will be impacts and offers future CEQA review for individual projects as mitigation but the chapter finishes by somewhat contradicting itself by saying "Increased traffic in the Plan area would significantly increase noise levels at sensitive receptors along certain street segments" and this would be an unavoidable significant impact.

The proposed Plan also contains goals, objectives and policies that promote development of new housing along mixed-use boulevards, in close proximity to regional and community commercial cen-

ters, subway stations, and bus route stops. Such development would have the potential to expose residential receptors to increased noise levels. The City's General Plan Noise Element Implementation Program p 6 would help reduce potential impacts by requiring appropriate design and insulation measures when processing building permits. Furthermore, Implementation Program p 12 requires when issuing discretionary permits for noise-sensitive uses mitigation measures must be implemented to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room.

23-21  
cont.

This may be achieved through design measures such as building orientation and buffering, installing insulation as recommended by an acoustical expert, or by applying other measures deemed appropriate by the City. These implementation plans would reduce potential impacts to a less than significant level.

### 9. Geology and Soils

Hollywood is a geologically complicated region, largely divisible into two areas; north of Sunset and south of Sunset. Both areas are crossed by at least two faults capable of producing a magnitude 6.6 earthquake. North of Sunset has somewhat more bedrock, while south is made up of run-off and deposit

- 1) Each site in the community is incredibly unique in terms of how it would react to ground shaking. Impacts, such as liquefaction are affected by the height of ground water to the surface. This is to say that construction of any project should conform to all relevant building codes.
- 2) Emergency measures, such as during an event like an earthquake, have not been included in this section.
- 3) There was nothing on the strength or ability of areas like the reservoir to withstand an earthquake. In the section on Tsunamis, floods and Seiche (p 4.5-5) there is no risk mentioned. The failure of the reservoir could be a devastating urban tsunami in an area that is utterly unprepared. Also, what would happen to the subway that bisects our community in the event of an earthquake?
- 4) "Soil and geologic conditions are site-specific" in the DEIR and there is little, if any, cumulative relationship between projects in the area.

23-22

### Further LWC Questions and Concerns: (not prioritized)

Note the Hollywood-Highlands/Kodak Complex cost about \$625m to build and a few years later, it was sold to CIM Group for only \$201m. Then the City underwrote \$30m to have the theater reconstructed. The DEIR is silent on the traffic nightmare the Complex caused in this portion of Hollywood. And though it is at a subway station, the project and parking facility are not financial successes.

23-23

The HCP (p 39) mentions the existence of the Metro Building/station on the S/E corner of Hollywood and Western. It conceals the fact that after 7-years, 50% of its retail space is still vacant.

To exceed local densities, there must be a clear rationale based on documented increases in population growth and housing demand which have outstripped locally permitted densities.

The HCP's implementation program of upzoning and upplanning is proposes to encourage growth to meet secondary Framework goals, such as transit use. This is an approach which turn LA's growth neutral General Plan on its head and conflicts with Charter Sections 556 and 558, which require consistency with the intent and purposes of the General Plan. The role of transit is to serve the public's need for mobility. Calls to increase density as a tool to increase transit use absolutely conflict with the General Plan.

The City's infrastructure has not been monitored since 1998. Claims existing user demand on the infrastructure, much less the demands of the larger population which predictably result from upplanning and upzoning, can be managed are questionable. Without demonstrated unused infrastructure capacity, there should be no increases in permitted density. Further, there is no proposal in the DEIR or the draft plan text to monitor local infrastructure conditions and effectiveness of the updated Plan's proposed policies and programs.

The DEIR uses year 2000 census data, estimates, and unfounded forecasts to justify the proposed changes. This methodology conflicts with State of California General Plan guidelines for a city's General Plan elements to be current and consistent. 2010 census is now available.

Attachments:

1. The La Brea Willoughby Coalition recommendations to the HCP planning process
2. CRA/DCP "Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential and Other Uses"
3. "Smart growth? Wise up. High density building increase, not decrease vehicular traffic;" LA Times Editorial
4. "We Need Jobs near Transit, Not Just Housing;" NBC LA
5. "Office Development, Rail Transit, and Commuting Choices. Nearly 3 times more riders likely to take public transit if stations near workplace, not residences. Robert Cervero, University of California, Berkeley. <http://www.worldtransitresearch.info/research/3442>
6. Census Data on Southern California's census and SCAG projections [www.scag.ca.gov/census](http://www.scag.ca.gov/census)
7. "Census shows steep decline in number of children; Daily Breeze 05/27/2011
8. US Census Data for LWC areas and Los Angeles. Total content as download.

Maps:

1. Draft Land Use and Zone Change , Figure 3-2c
2. Media District Industry Retention Area, Plan map13
3. Hybrid Industrial Areas, Plan map 13
4. Major Transit Corridors, LWC area, Plan map11

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6. Census Data on Southern California's census and SCAG projections [www.scag.ca.gov/census](http://www.scag.ca.gov/census)
7. Forecast Growth by Subregions and Community Plan Area, Table 2-2; LA DCP
8. "Census shows steep decline in number of children; Daily Breeze 05/27/2011
9. US Census Data for LWC areas and Community Plan Area Entire 34-page content as down load on request to LWC.
10. "For California, a Slower -Growing Population;" Jennifer Medina, NYTimes March 8, 2011
11. "USC study finds big drop in number of children living in LA County;" LATimes May 25, 2011
12. "California lowers population count;" Mark Lacter, LAObserved, April 29, 2011

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La Brea Willoughby Coalition  
*Save the neighborhood!*

**RE: HOLLYWOOD COMMUNITY PLAN/LWC "REAL" COMMUNITY INPUT**

**The La Brea-Willoughby Coalition (LWC), strongly involved with the 1988 Hollywood Community Plan (HCP, the Plan), has also long been involved with the evolving updated HCP. We again urge the Los Angeles City Planning Department (CPD) to address the LWC points made in its ongoing input of the issues below in the updated Plan DEIR.**

We applaud the CPD edict: To protect and preserve existing neighborhoods with balanced, "real" planning. The LWC encompasses such a vibrant, healthy neighborhood. Planning decisions have more often been made by individuals who have not been to, do not know, and most certainly do not live in our neighborhood. It has more often been developer-driven with the CPD giving "presentations" of what was the plan rather than to welcome and incorporate public, community input.

**The updated HCP process must be more open, transparent and participatory with real community involvement. To this end, the LWC welcomes the challenges posed by the updated HCP DEIR urge specifically to:**

- Analyze all possible alternatives for their long range economic benefits to the city and quality of life impacts in the neighborhood;
- Preserve the La Brea/Willoughby Formosa/Romaine block industrially zoned land for cleaner, greener industrial development(s).**
- Analyze jobs element and economic factors in industrial and in all alternative zoning to demonstrate industrial-zoned land promotes economic health and well-being of the city. Lost of Industrial-zoned land (all types, including low-intensity industrial zoned land) to more housing and retail will not lead to a strong local economy;**
- Project all cumulative, predictable impacts of increased density and FAR resulting from future SB1818 by-right density bonuses and multiple proposed developments to the [**determine for adequacy**] **infrastructure and the neighborhood;**
- Determine traffic studies through more realistic models, eg, the La Brea Willoughby Coalition Traffic Report, and Willoughby, already at gridlock, will not support the proposed height increases from La Brea eastward;
- Relieve cut through traffic on Willoughby and Waring, narrow collector streets;
- Retain sufficient transition from commercial and mixed use projects in size, scale, and character to the residential neighborhood, and
- Maintain zoning, height limits ([Q]R3-1XL) and FAR 3:1 set by current HCP to ensure moderate density.

23-24

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See FEIR Appendix for further Attachments to this letter.

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**VIA PERSONAL DELIVERY**

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**EMAIL [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)**

Ms. Srimal Hewawitharana  
City of Los Angeles  
Department of City Planning  
200 Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on the Hollywood Community Plan and Hollywood Community  
Plan Update Draft EIR, EIR No. 2005-2158 (EIR), State Clearinghouse  
No.2002041009, CPC No. 97-0043(CPU)

Dear Ms. Hewawitharana:

**I. INTRODUCTION.**

This firm and the undersigned represent the La Mirada Avenue Neighborhood Association of Hollywood, members of which work and reside in, and will be significantly and adversely affected by, the Hollywood Community Plan (“HCP”) Update as currently proposed. We submit these comments and objections on its behalf

24-1

Please ensure that all communications from the City to our client regarding the Project are also promptly copied to our office. All objections, including those regarding proper notice and due process, are expressly reserved. We also reserve the right to further comment on the HCP Update and HCP Update EIR. Please also ensure that notice of all hearings, actions, events and decisions related to the HCP Update are timely provided to this office.

**II. THE POPULATION FORECAST ON WHICH THE HCP UPDATE RELIES SUBSTANTALLY OVERESTIMATES POPULATION.**

The HCP update increases density substantially, asserting that the proposed changes in land use classifications, districts, and zoning are necessary to provide for anticipated population increases and to avoid potentially significant housing and population impacts that would result if density is not increased. This is tied entirely to

24-2

population and housing forecasts for 2030, based on 2005 projections derived from SCAG's 2004 Regional Transportation Plan ("RTP"). (DEIR, p. 42-2.)<sup>1</sup> However, past overestimations by SCAG combined with current census data provide substantial evidence that the 2030 forecast for the City also overestimates population.

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cont.

SCAG forecasts used in prior Los Angeles planning documents have turned out to be significantly overestimated. In Chapter 2 of the General Plan Framework Element, SCAG's 1993 forecast for the entire City of Los Angeles in 2010 was 4,306,000. The adopted 2008 SCAG RTP reduced the 2010 projection to 4,057,484. See [http://www.scag.ca.gov/forecast/downloads/excel/RTP07\\_CityLevel.xls](http://www.scag.ca.gov/forecast/downloads/excel/RTP07_CityLevel.xls) (accessed May 25, 2011), incorporated herein by this reference. The 2010 census, however, showed only 3,792,621 residents (**Exhibit 1**), meaning that SCAG's 1993 estimate had overestimated population by almost 12%. Even the 2008 RTP overestimated the City-wide 2010 population by 6.5%.

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The current HCP, at the time it was adopted in 1988, estimated a 2010 population of 219,000 for the HCP area. (HCP, p. HO-3.) At the time of the Framework Element adoption, the forecast for the HCP area was an increase in population from 213,869 in 1990 to 257,035 in 2010 based on SCAG projections. General Plan Framework Table 2-2: Forecast Growth By Subregional Community Plan Areas. (**Exhibit 2.**) However, the 2030 forecast now puts the plan area 2030 population at 244,602 – almost 13,000 less than had once been predicted for 2010.

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SCAG's 1993 housing forecast for 2010 for the entire City of Los Angeles was 1,556,000 households, but the 2010 census showed 1,318,168 occupied housing units city-wide. While households and occupied dwelling units may not be totally identical, it still reflects an overestimation of almost 16% by SCAG.

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This suggests modeling that presents higher population projections than will actually occur, creating substantial evidence of a forecast that overestimates population and housing for 2030.

The 2030 forecast relies on a base year of 2005. The 2006 City of Los Angeles CEQA Threshold Guide notes, however, that "every 10 years these estimates are reconciled by the U.S. Census." City of Los Angeles CEQA Thresholds Guide (2006), p. J.1-1, n. 1. (**Exhibit 3.**) Census data for 2010 are available and must be used to provide

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<sup>1</sup> See also, DEIR, p. 6-2 ("The population, housing and employment associated with the proposed project would be consistent with the growth anticipated for the City of Los Angeles as a whole. The proposed plan is designed to satisfy the projected growth forecast by SCAG.")

both an accurate baseline and a more accurate forecast. Use of the recently available census data is also critical because the HCP Update provides no means by which to monitor actual population and housing changes within the HCP area as required by General Plan Framework Policy 3.3.2. The 2010 census will, to a great degree, allow “ground truthing” of the baseline used in the Plan.

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cont.

Using 2010 census data available through public websites, [www.blogdowntown.com](http://www.blogdowntown.com) and [www.nytimes.com](http://www.nytimes.com), the 2010 population in the HCP area is approximately 197,085 – a decrease of approximately 6.5% from 2000. (See **Exhibit 4** [memorandum from D. Platkin to B. Torgan, May 31, 2011].) The boundaries for the Census data used in [www.blogdowntown.com](http://www.blogdowntown.com) and [www.nytimes.com](http://www.nytimes.com) are not identical to the boundaries used for the HCP because of slight differences in census tract boundaries and HCP boundaries, but they are close. Using those same [www.blogdowntown.com](http://www.blogdowntown.com) and [www.nytimes.com](http://www.nytimes.com) sources, the 2000 population figure for the area they covered in the 2010 census was 212,184 – a difference of less than 1% from the 2000 figures used by the City for the HCP area.

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This population decrease for the area is consistent with population decreases in adjacent municipalities. West Hollywood is bordered on three sides by the HCP area. Its population decreased by 3.8% percent from 2000 to 2010, from 35,716 residents to 34,339 residents.

While the slight variations in boundaries can explain some of the discrepancy between the SCAG projections and the actual population, it cannot explain away the difference between SCAG’s 2005 projection of 224,296 and the population of 197,085, a difference of over 13%. If anything, adjusting for the difference creates an even larger discrepancy between SCAG forecasts and the actual population.

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A SCAG forecast from 2004 for 2010 shows an even greater discrepancy. In the 2006 Paseo Plaza Hollywood EIR, the City used a SCAG 2004 forecast of 232,743 residents in the Hollywood Community Plan area – an overestimate of 33,494 residents, or nearly 15%. (**Exhibit 5.**)

The net result is a grossly inaccurate environmental baseline. Where, as here, the baseline environmental conditions have not been fairly or accurately described, it is impossible to accurately analyze and render conclusions about the environmental impacts associated with a project. As noted elsewhere in this correspondence, the census data available provides substantial evidence that the SCAG forecast are wildly inaccurate and ultimately lead to a plan that does not meet EIR objectives and is inconsistent with the General Plan.

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**III. USE OF AN INACCURATE BASELINE RESULTS IN A PLAN THAT DOES NOT MEET PLAN OBJECTIVES.**

The very first objective in the DEIR is “to provide additional housing, especially near supporting infrastructure and services, including public transit, for an anticipated population increase.” (DEIR, p. 2-5 [emphasis added].) In the context of the HCP, this objective means that the HCP update must only plan for the additional population forecast by SCAG for the year 2030. Building to accommodate only that which is anticipated helps avoid overbuilding and the attendant environmental and economic impacts that come with it. This “accomodationist” approach is apparently taken to ensure consistency with the Growth and Capacity provisions of the Los Angeles General Plan Framework Element, which provisions state that “it is not the intent of the Framework Element to cause any specific level of population growth to occur. It is a plan to accommodate whatever growth does occur in the future, which could include a loss of population.” See <http://cityplanning.lacity.org/cwd/framwk/chapters/02/02.htm>, accessed May 31, 2011. Deliberately providing for substantial excess capacity would, in effect, cause growth by providing for that which is not otherwise expected to occur, violating the intent of the Framework Element.

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From 2005 to 2010, the SCAG forecast anticipates that another 20,176 people will move into the HCP area. The HCP Update purports to provide for 4,460 new residents beyond the SCAG forecast, for a total of 24,636. Based on current population baseline figures from the 2010 census, though, the HCP Update is providing for at least an additional 49,813 residents – twice the amount acknowledged in the DEIR. This violates the accomodationist approach called for in the project objectives or General Plan Framework Element. It encourages growth and a growth rate significantly greater than that which would simply accommodate another 24,000 or so residents.

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Using the existing HCP, reasonable expected build out is 235,850 residents. This actually comes much closer to accommodating the anticipated growth in the HCP than provided for in the HCP Update.

**IV. USE OF AN INACCURATE BASELINE RESULTS IN A GROWTH INDUCING IMPACT THAT IS NOT ACKNOWLEDGED IN THE DRAFT EIR.**

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The grossly inaccurate baseline population also results in an inaccurate conclusion with respect to growth inducement. Pursuant to CEQA Guideline § 15126.2(d), an EIR must “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly,

in the surrounding environment....” It must “also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively....” The DEIR does no such thing. It merely concludes that the HCP Update is not growth-inducing because it only provides for the approximately 24,000 additional residents that are forecast for the HCP area in 2030. When reconciled with current census data, however, the HCP Update actually provides for over 50,000 new residents. The increase in density and upzoning to provide for this much larger number must be considered growth inducing. In this regard, though, the DEIR is silent.

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cont.

Increasing vacancy rates are also an indicator of the growth inducing nature of the HCP Update. According to census data available through the New York Times website, there were 95,578 occupied housing units in the HCP area in 2010. Another 8,365 units were unoccupied, for a vacancy rate of 8%. By comparison, City data show a 2000 vacancy rate of 4.62%. As population decreased, vacancy rates rose. Into this mix, the City has entitled or put in the planning pipeline at least another 5,000 units since 2005. (**Exhibit 6.**) Assuming the vacancy rate drops back to 2000 levels, existing unoccupied units combined with these already planned, but not yet built projects, means that the vast majority of additional housing needed by 2030 has already been accommodated. By seeking to increase density and thus increase excess capacity, the HCP Update is a growth inducing project.

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**V. THE DRAFT EIR FAILS TO ACKNOWLEDGE AND ANALYZE SIGNIFICANT AIR QUALITY IMPACTS AND HEALTH RISKS OF INCREASING RESIDENTIAL DENSITIES ADJACENT TO FREEWAYS.**

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The proposed HCP increases residential density/upzones in several areas of the HCP area within 500 feet of the Hollywood Freeway. This will result in increased exposure of sensitive receptors to substantial pollution during the operation of projects built under the proposed HCP, not just construction of those projects, as asserted by the Draft EIR. (See DEIR, p. 4.6-27.)

The Draft EIR itself notes CARB siting recommendations that include avoiding siting sensitive receptors within 500 feet of freeways and high-traffic roads. (*Id.*) Although not noted, SCAQMD has adopted similar land use planning guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 2005). What this means is that increasing the density of multi-family housing in which children may be present within 500’ of a freeway presumptively creates a significant impact to human health. This impact is well-documented, including the 2004 Children’s Health Study (see **Exhibit 7**), another 2007 study conducted by

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researchers at the USC Keck School of Medicine, which linked such exposure to increased risk of asthma and impaired lung development (see **Exhibit 8**), and a 2010 study that found a link between living adjacent to freeways and autism. (**Exhibit 9**)

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cont.

The Draft EIR suggests that the City’s policies and practices requiring filtration systems for those projects, generally precluding operable windows facing freeways, and dense landscaping, would reduce the impacts to a less than significant level. (DEIR, p. 4.6-22.) There is no substantial evidence, however, to support this conclusion.

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A recent article in the L.A. Weekly, (**Exhibit 10**, [“Black Lung Lofts, L.A. Weekly, March 6, 2010, <http://www.laweekly.com/2010-03-06/news/black-lung-lofts/>, accessed April 5, 2011]) indicated that policies generally requiring air-filtration systems are ineffective; “it is both a measure that scientists say [does] not keep fine-particulate matter out of the lungs of children and others because the dust is so pervasive and works its way through a building's tiniest cracks and holes.” Moreover, air filtration does not trap many gaseous pollutants. (**Exhibit 11** [Abstract of “Pilot Study of High Performance Air Filtration for Classroom Applications, October 2009].)

Additionally, air pollution is not a line of sight event rendering inoperable windows an ineffective tool. The back sides of buildings not facing the freeway will have almost the same levels of air pollution as windows facing the freeway.

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Because of these significant air quality impacts to public health, any changes in classifications or zones of residential property within 500 feet of the freeway that increase density will create an internal inconsistency with relevant HCP Land Use goals and policies. Specifically, these changes conflict with Goal LU.5: Encourage sustainable land use and building design. Part and parcel of this goal is the promotion of public health and livability. Establishing land use patterns that increase residential density within 500 feet of the freeway is contrary to that encouragement. Similarly, the proposed changes are inconsistent with Policy LU.5.1: Promote sustainable land use, streetscape and building policies to protect the environment and public health, for the same reason. Establishing land use patterns that increase residential density within 500 feet of the freeway is not consistent with a land use planning policy designed to protect public health.

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**VI. SEVERAL PROPOSED PLAN POLICIES ARE INCONSISTENT WITH THE GENERAL PLAN.**

Policy LU.2.3 in the proposed HCP Update is “Provide opportunities for commercial office and residential development within downtown Hollywood by extending the Regional Center land use designation to include Hollywood Boulevard and Sunset Boulevards, between Gower and the 101 Freeway.” This is directly inconsistent with the General Plan Framework Land Use Element, including Policy 3.1.4: “Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4).” Policy 3.4.1 also dictates development patterns in accordance with the General Plan Framework Long-Range Land Use Diagram. That diagram, Figure 3-1, clearly shows that the Regional Center does not extend east along Hollywood Blvd. and Sunset Blvd. to the Hollywood Freeway. (**Exhibit 12.**)

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While Policy LU.2.3 can be shown to be inconsistent merely by direct comparison, other policies are inconsistent when exposed to the correct environmental baseline. Policy LU.2.2, for example, “Utilize Floor Area Ratio bonuses to incentivize commercial and residential growth in the Regional Center,” is inconsistent because it has the effect of accelerating growth beyond the amount forecast for the HCP area. Policy LU.2.1, “use planning tools to encourage jobs and housing growth in the Regional Center,” suffers from a similar problem.

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The net result of these inconsistencies is not just a significant land use impact as defined by CEQA, but the inability of the City to make the General Plan consistency findings dictated by the City Charter.

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**VII. THE DRAFT EIR FAILS TO PROPERLY ANALYZE CUMULATIVE IMPACTS.**

“An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable....” CEQA Guidelines § 15130(a). “[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.” CEQA Guidelines § 15130(a)(1).

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The cumulative impact analysis here is meaningless because it provides no list or does not otherwise identify related projects, let alone sufficiently analyze the cumulative impacts. For instance, the HCP area borders West Hollywood to the south and west. The

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eastern portion of West Hollywood, closest to the HCP area, is undergoing significant growth and West Hollywood is currently undergoing its own General Plan update. The cumulative effect of increased development capacity (or even existing development capacity under the West Hollywood General Plan) could have potentially significant cumulative impacts on everything from land use to recreation to transportation, cumulative impacts that must be properly identified and analyzed.

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cont.

As stated in Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184: “Proper cumulative impacts analysis is absolutely critical to meaningful environmental review” (*id.* at 1217), and “questions concerning . . . cumulative impacts constitute important issues of broad public interest that are likely to reoccur.” *Id.* at 1203.

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“A cumulative impact analysis which understates information concerning the severity and significance of cumulative impacts impedes meaningful public discussion and skews the decisionmaker’s perspective concerning the environmental consequences of the project, the necessity for mitigation measures, and the appropriateness of project approval.” Citizens to Preserve the Ojai v. County of Ventura (1985) 176 Cal.App.3d 421, 431.

As the Supreme Court has stated, without proper consideration of cumulative impacts, this critical issue may be “submerged,” with potentially “disastrous consequences” to the environment. Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 283-284.

**VIII. POTENTIALLY SIGNIFICANT TRAFFIC IMPACTS GO UNALYZED IN THE DEIR.**

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The attached correspondence from Arthur L. Kassan, P.E., a consulting traffic engineer with over 50 years experience, is attached as **Exhibit 13**. It has been also been filed separately and is incorporated herein by reference.

**IX. THE ALTERNATIVES ANALYSIS IS INACCURATE AND FAILS TO PROVIDE FOR A REASONABLE RANGE OF ALTERNATIVES.**

According to the DEIR, “Alternative #2 is superior from a strictly environmental stand point, but it does not meet the goals and objectives of the City, County and SCAG in terms of preparing communities for social and economic changes that are expected through the year 2030. It accommodates some of the forecasted growth in population, but not all of it.” (DEIR, p. 5-9.) As noted above, however, Alternative #2 (the current HCP) more than

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accommodates the amount of growth forecast by SCAG when the environmental baseline is reconciled with current census data. Indeed, the current HCP can accommodate the amount of growth forecast by SCAG and still have a buffer for additional growth beyond that provided for in the proposed HCP Update.

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cont.

This also shows that the DEIR has failed to provide a reasonable range of alternatives, in further violation of CEQA. According to the Growth and Capacity chapter of the General Plan Framework Element, its intent is “to accommodate whatever growth does occur in the future, which could include loss of population,” and that the planning horizon for the plan may be adjusted to reflect actual levels of growth (<http://cityplanning.lacity.org/cwd/framwk/chapters/02/02.htm>). Based on this, an alternative that reflects actual growth, or in this case a loss of population over the last 20 years, must be analyzed.

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**X. CONCLUSION.**

For the foregoing reasons, the HCP Update DEIR is inaccurate and the HCP Update itself cannot be found consistent with the City of Los Angeles General Plan. Moreover, the DEIR is so inaccurate that the use of correct baseline data and the revised analysis will add significant new information, thus requiring recirculation pursuant to CEQA Guidelines § 15088.5(a).

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Thank you for the opportunity to provide these comments.

Very truly yours,



BRADLY S. TORGAN, AICP  
FOR  
THE SILVERSTEIN LAW FIRM

Attachments  
BST:aa

June 1, 2011

RECEIVED  
CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENTAL  
UNIT

Suriya Prasad  
5419 La Mirada Avenue  
Los Angeles, CA 90029

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Srimal:

Please note the following comments on the Draft Environmental Impact Report for the Hollywood Community Plan Update, ENV-2005-2158-EIR.

Five years ago I submitted the enclosed letter on behalf of my neighborhood to Ms. Mary Richardson of the Los Angeles City Planning Department. I received no reply, and your Draft Environmental Impact Report does not even acknowledge that I submitted comments on the proposed Hollywood Community Plan. Obviously, no one at the Planning Department cares about what our community has to say.

We do not want more density in our neighborhood. I have owned my home for almost forty years, and much has changed for the worse in Hollywood during that time. One thing, however, that hasn't changed is the friendship my neighbors and I have in our small area of remaining single-family homes. We do not want this stability destroyed by senseless densification that will bring more crime, traffic and trash to what once was a beautiful area.

Please respect the Hollywood community and downzone our neighborhood. The zoning right across the street is restricted density while we are zoned for high density. There is no physical difference between the two areas, except that we are unfortunately on the border of the CRA area and are zoned [Q]R4. This makes no sense.

As I stated in my letter five years ago, the Community Plan Update is supposed to reflect what the community wants. Please, start listening to what we have to say.

Thank you,

*Suriya Prasad*

June 4, 2006

Suriya Prasad  
5419 La Mirada Avenue  
Los Angeles, CA 90029

Mary Richardson/Community Planning Bureau  
City of Los Angeles, Planning Dept.  
200 N. Spring Street, Room 667  
Los Angeles, CA 90012

Dear Ms. Richardson:

My neighbors and I are writing you this letter in reference to the Hollywood Community Plan Update, City Plan Case No. CPC-2005-6082. Our neighborhood is referred to in the Draft Matrix as subareas 23:4 and 23:4A.

My neighbors and I are extremely concerned about your proposal to increase density in our community by removing the [Q] condition from our zoning. Twenty years ago the City made a terrible mistake by upzoning our quiet neighborhood to R4. Thankfully, the [Q] condition was also put in place to limit this density increase, in order to assess the impacts such increased density would create. The assessment of these impacts was never done, yet you now propose to fully implement this increased zoning density. This is unacceptable to this community.

Our neighborhood is a quiet, residential area of historic Hollywood. I have lived here for over 30 years, and many of my neighbors have owned homes here for even longer. We are a tight-knit community of extended families that work hard to keep our streets clean and our homes beautiful. We are also a neighborhood that emphasizes family over all else. My children and grandchildren all live with me, and my neighbor's children and grandchildren live together, also. This is a stable area of single-family homes, and we demand that the City Planning Department recognize this fact by downzoning this community with similar zoning found just across the street. Those areas are all zoned R1.5 with height limitations, and we insist on being zoned at this level, also.

The Community Plan Update is supposed to reflect what the community wants, not what developers want. The people in this neighborhood have lived here for generations, and we demand that our community is recognized as being just as worthy of preservation as other areas of Hollywood that the Community Plan proposes to downzone. To do otherwise is an insult to all of us who have worked so hard to make this area a truly wonderful place to live.

Thank you,

*Suriya Prasad*

*Francis Smith*  
Francis Smith

*Jose Garcia & Asuncion Lopez*  
Jose Garcia & Asuncion Lopez

*Gladys & Flavio*  
Gladys & Flavio

*Daniela Polanco*  
Daniela Polanco

*Alma Paula*  
Alma Paula

*Suriya Prasad*  
Suriya Prasad

*Evan Hunt*  
Evan Hunt

*James*  
James

*David*  
David

*John*  
John

*Michelle*  
Michelle

*Patricia*  
Patricia

*Sam*  
Sam

*June*  
June

25-1  
cont.



**ARTHUR L. KASSAN, P.E.**  
*Consulting Traffic Engineer*

May 31, 2011

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Hollywood Community Plan Update  
Case No. EIR-2005-5158-EIR

Dear Srimal Hewawitharana:

On behalf of my client, the La Mirada Neighborhood Association, I have reviewed the Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update, including Appendix C, "Transportation Improvement and Mitigation Program (TIMP)". I concentrated on the effects of the Plan on the La Mirada Neighborhood located east of Western Avenue and south of Fountain Avenue.

The neighborhood currently contains a mixture of single-family houses and small-scale multi-family residences. The up-dated plan proposes to increase the residential density of the neighborhood substantially by removing the Q condition from the current zoning designation, that is, from [Q]R4-1VL FAR3:1 to R4-1VL FAR3:1. [DEIR Appendix A.5 page 67 (SA 23:4)] The existing land use description in the Appendix of "multiple-family residential, office, commercial" is misleading. It ignores the existing predominance of single-family residential in the neighborhood; any office and commercial uses are very limited and located along Fountain Avenue only.

26-1

The neighborhood is somewhat isolated because it is bounded on the southwest side by the Hollywood Freeway, and there is relatively poor connectivity to the surrounding arterial streets:

- There is only one connection to Western Avenue (La Mirada Avenue) at which the neighborhood traffic is controlled by a STOP sign with no traffic control on Western Avenue; that makes it difficult for neighborhood traffic to turn left onto southbound Western Avenue;
- The two connections to Fountain Avenue (Serrano Avenue and Hobart Boulevard) are controlled by STOP signs with no controls on Fountain Avenue; that makes it difficult for neighborhood traffic to turn left onto westbound Fountain Avenue.

The proposed increase in residential density for this neighborhood is inconsistent with several of the stated goals of the plan update: "The Proposed Hollywood Community Plan also contains policies and programs to protect the character of low-scale residential neighborhoods ..." [DEIR page 2-3]; and "The recommended pattern of land use directs future growth to areas of Hollywood where new development can be supported by transportation infrastructure ..." [DEIR page 2-2].

The TIMP, which is Appendix C of the DEIR, and the analyses of its potential effectiveness are significantly flawed.

1. The measure that is used to compare the current traffic flow conditions throughout the community with potential flow conditions in the year 2030 is the "volume weighted average volume/capacity ratio". [Appendix C, page 4] The street network in Hollywood was divided into hundreds of individual links. The current or future (as appropriate) volume and capacity of each link were identified, and a volume/capacity ratio for each link was calculated. According to the TIMP, "The volume weighted average V/C ratio is calculated by taking each link volume and multiplying it by its corresponding V/C ratio. This is divided by the sum of the total volumes. It essentially represents the average V/C ratio for the entire network in Hollywood." [Appendix C, page 4]

That is a relatively crude method of analysis. Volumes vary along each link depending on the length of the link and the development that is adjacent to the link. Yet, the analysts claim that they are able to express the volume weighted average volume/capacity ratio for the entire 25-square-mile area of the Hollywood community as a single number that can be calculated to three decimal places. That implies a level of precision that is far beyond the level that can be expected from the analysis method and the base data, particularly when predicting conditions in the year 2030, the target date of the plan update, 20 years from the date of the TIMP preparation. As a result, the findings of the TIMP effectiveness analyses are seriously distorted.

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2. A similar distortion of the implicitly-claimed precision of the TIMP effectiveness analyses is shown in Table EX-8 [Appendix C, page EX-8], which is a comparison of predicted afternoon peak-hour travel characteristics in the year 2030 with two potential plans in effect – the existing plan; and the proposed plan plus the TIMP. For the number of "Hollywood Vehicle Trips" shown in the table, the difference between the two plans is only 158 trips out of a total exceeding 125,000. That is a difference of 0.13%, according to the text following the table. That level of difference is well within the error rate that would be expected in calculating two sets of traffic flow characteristics for a time 25 years after the base year for the data and 20 years after completion of the report. The TIMP report implies a level of precision that cannot be shown to be valid.

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3. The TIMP program, described on pages 50 through 74 of the Appendix C text, is vague and not subject to evaluation as to feasibility and effectiveness of its recommended measures. For example, the first item under "Transportation Systems Management Strategies" is "Provide a well-maintained, safe, efficient freeway, highway and street network." [Appendix C, page 53] It goes without saying that that should be the duty of every road transportation agency and does not have to be stated as if it is an improvement on the current situation.

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4. The TIMP has a brief section on Neighborhood Traffic Management Plans beginning on page 69 of the Appendix C text. The discussion is generalized, listing virtually every residential neighborhood in the Hollywood Community Plan area as a problem location. The City Department of Transportation (LADOT) has already designated the La Mirada Neighborhood as an attractor of significant volumes of by-pass traffic. Drivers avoiding the Santa Monica Boulevard/Western Avenue intersection use Serrano Avenue and La Mirada Street to travel through the neighborhood. Unfortunately, LADOT has disbanded the Neighborhood Traffic Management "unit" that is described in the TIMP [Appendix C, page 70], and there is no longer an LADOT section that addresses citizens' complaints

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about neighborhood traffic intrusion. Therefore, the up-dated community plan should address other means of solving those real and growing problems.

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cont.

5. Funding of the proposed provisions of the TIMP will be problematic. Typically, the City has relied on private developers as a major source of funding for transportation-related improvements as development projects are implemented. That is particularly true in areas such as that covered by the West Los Angeles TIMP and areas covered by control ordinances, such as the Ventura/Cahuenga Boulevard Corridor Specific Plan.

However, the ability to do that in the Hollywood Plan Update area has been severely compromised and, most likely, that funding source can not be used at this time. As stated in the TIMP, "In order to develop a new source of funding that would assess part of the costs of new transportation improvements to new developments through a development impact fee program, the City would need to develop a nexus study that clearly establishes the nexus between the trips generated by new development and the costs associated with the transportation improvements required to reduce the impacts of those developments." [Appendix C, page 73] The City has not begun such a study.

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In the past several years, many large projects have been approved in the Hollywood community, and none have them have been assessed the type of transportation impact fee that is called for in the TIMP. The opportunity to collect significant amounts of transportation mitigation fees that could be used for the improvement measures has thus been lost. Considering the magnitudes of those recently approved projects, the demand for and number of significant projects in the foreseeable future, after such time as an impact fee might go into effect, will be far less, and the funding for the TIMP may not be adequate to implement the most effective measures.

6. Fountain Avenue is the northern boundary of the La Mirada neighborhood. It is currently a narrow street that does not meet Secondary Highway standards, as it should. East of Western Avenue (including the segment adjacent to the La Mirada Neighborhood), there is only one traffic lane in each direction, and most intersections do not have left-turn lanes. One of the recommendations in the TIMP is to widen Fountain Avenue from Western Avenue to Sunset Boulevard. [Appendix C, page 49] Fountain Avenue through that section is lined with densely-spaced residential and commercial buildings, many built up to or close to the existing street right-of-way lines. It would not be feasible to widen the street roadway without destroying many of the residences and businesses along the street. Even with the recommended widening, Fountain Avenue, east of Western Avenue and adjacent to the La Mirada Neighborhood, will operate at Level of Service E or F during the afternoon peak hour in 2030 with the proposed plan and the TIMP in place. [DEIR main text, Figure 4.5-6, page 4.5-28]

26-7

7. The analyses of the effectiveness of the TIMP is based on the following assumption on the part of the consultants: "... it was estimated in consultation with LADOT, that the cumulative effect of the trip reduction policies would be a minimum of a 5% reduction in peak hour vehicle trips." [Appendix C, page 75] However, that is an arbitrary estimate without documentation or foundation. The only justification presented is the sentence: "This level of reduction has been achieved in many developments throughout southern California." [Appendix C, page 75]

26-8

Where is the list of "many developments throughout southern California"? Are any of them as large and complex as the 25-square-mile Hollywood community? Are there data about the success of those programs five years after implementation? Ten years after? 20 years after? Many of those programs may have initial successes which are reported by those who have implemented the programs and have a stake in their continuance and expansion. But, there is little, if any, information about the significantly long-term experience of such programs. The plan is meant to cover a period of almost 20 years, from now to 2030. Without answers to the foregoing questions, there is no substantial evidence to support the assertion of a minimum of a 5% reduction in peak-hour vehicle trips.

26-8  
cont.

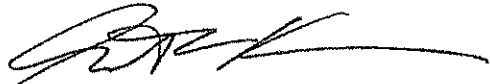
Based on that 5% trip reduction assumption, the consultants then go on to make calculations of future conditions to a precision of three decimal places. That is well beyond the level of precision that is warranted when the basis is an assumption for which no foundational evidence has been provided.

Even with that broad assumption of the TIMP trip reduction, the currently-proposed plan (with the TIMP) will result in worsened traffic conditions throughout the Hollywood community when compared with conditions under the existing (1988) plan – a weighted v/c of 1.000 with the proposed plan and TIMP compared with 0.993 with the existing plan.

Until the TIMP is modified and expanded with assurances that the recommended programs will be implemented and that there will be a fair and equitable funding system in place for that process, the objective of the Community Plan – new development that is supported by the transportation infrastructure – can not be attained. The up-date process should be extended to include a development impact fee program that is feasible and geared to immediate initiation.

I would be pleased to discuss my comments with City officials and staff members. Please contact me if there are any questions.

Very truly yours,



Arthur L. Kassan, P.E.  
Registered Traffic Engineer No. 152  
Registered Civil Engineer No. 15563

LMU Environmental Action Team

1

4/30/2011

Srimal Hewawitharana  
Los Angeles City Planning Department  
200 Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAY 04 2011

PLANNING

Dear Coordinator Hewawitharana:

As citizens interested in the long-term development of the Los Angeles region, we the members of the Loyola Marymount University Environmental Action Team respectfully submit the following comments with regard to the proposed Hollywood Community Plan Update. Our comments are organized as follows:

### 1. Summary

The following outlines our main points of both support and concern. While we are in support of many of the DEIR's goals and implementation plans, there are some significant changes that we believe are necessary in order for the Hollywood Community Plan Update to properly and thoroughly mitigate environmental impacts, encourage a more socially just community, and prepare for a sustainable future. These include:

- Incorporation of mixed housing into the goal of mixed use zoning
- Improvement of bicycle infrastructure
- Increased zoning for open space
- Prevention of excessive wastewater pollutants

We believe the inclusion of these points in the Final Environmental Impact Report will ensure improved health and environmental sustainability for the Hollywood Community Plan area.

### 2. Points of Support

- a) We value the city's commitment to mixed use zoning.
- b) We commend the city for aiming to increase green spaces and community garden space, and we greatly appreciate what the DEIR has stated as the encouragement of "green space, landscaping, and street management policies, [all of] which reduce the energy costs of cooling, support the pedestrian environment, and improve the public realm."
- c) We appreciate the plan's emphasis on parks and green infrastructure, stated as:

CF.5.66: Maintain, improve, connect and expand existing equestrian trails and hiking trails. implement standards for trails as outlined by the Department of Recreation and Parks.

CF.5.67: Coordinate with the Department of Recreation and Parks and Department of General Services to review and evaluate surplus property as potential sites for parks and recreational facilities.

27-1  
cont.

### 3. Suggestions

#### a) *Incorporate Mixed Housing into the goal of Mixed Use Zoning*

Mixed housing involves zoning an area to offer a variety of housing types that are accessible to a wide range of income levels.

Although the DEIR asserts that “mixed use” is a main goal of the zoning and land use changes to combine residential and commercial uses, mixed housing is not described as a goal. Mixed housing or “balanced communities” must be added as a goal of the zoning and land use changes, and the land uses should be zoned in order to facilitate mixed housing.

While mixed use is defined as “the development combining residential and commercial uses to improve jobs housing relationship in the CPA, which is consistent with the Housing Element policies of the General Plan,” this definition does not include mixed housing. Mixed housing involves zoning the land in order to allow for a variety of residencies in the same area. For example, on a single block, there could be single-family homes, multi-family residences (duplexes), and apartment buildings or condominiums. Mixed housing should be a goal within the DEIR’s preestablished goal of mixed use. Thus, a range of housing options can be located within an area that contains both residential and commercial land uses.

27-2

Benefits of mixed housing include:

- Ensuring safer communities
- Promoting stronger communities
- Promoting urban renewal
- Promoting social diversification
- Improving social mobility
- Enhancing living conditions for residents
- Improving community cohesion

A mixed housing community includes residents of varying incomes who tend to both live and work in the community. This makes crime less likely because residents are less likely to perpetrate damage upon their own community. Since residents have varying incomes and

varying hours of work, those who have more convenient hours can ensure that their community is represented as necessary with regard to politics, community organizing, education improvement, etc. For example, voters who can afford to get away from work in order to vote will be beneficial to those who cannot afford to leave work to vote. Thus, the needs of the community will be represented.

While we appreciate the environmental benefits of mixed use zoning, we assert that the social justice benefits of mixed housing are just as necessary and beneficial to the Hollywood Community Plan area. The results of a combination of mixed housing and mixed use would improve the quality of life for residents and commercial entities.

The DEIR states: "The residential land use goals, objectives, and policies reflect the need for a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Community," (page 2-6). In order to accurately achieve this goal, it is imperative that zoning allow for and facilitate mixed housing.

#### b) *Improve Bike Infrastructure*

We strongly commend the plan's attention to bicycle thoroughfares and its recognition of areas in need of enhanced bicycle infrastructure. The numerous benefits of bicycling in terms of its effects on carbon emissions, human health, and traffic reduction are often overlooked, and each new improvement in infrastructure increases the potential for such benefits to significantly improve our cities. We do, however, have some general comments regarding the improvement of bicycle safety and the encouragement of bicycle use. First, while Class III Bike Routes signify that streets are safe for bicyclists, very few inexperienced to moderately experienced bicyclists will venture onto a street without a Class II Bike Lane. Moreover, motorists are not sufficiently educated as to the significance of the Class III signage; therefore, the signs generally do not increase awareness of cyclists on these routes.

We recommend that the City look to increase the number of bike lanes and bike paths (Class I and II) and implement bicycle education programming to both increase the likelihood that this infrastructure is utilized and to increase awareness among motorists of bicycle traffic. Furthermore, we strongly support designating bikeways in the study corridors mentioned in the Draft Environmental Impact Report.

#### c) *Expand Zoning for Open Space*

27-2  
Ciont.

27-3

27-4

The Hollywood Community Plan Update shows that Hollywood has a high amount of open space. However, this high amount is mainly due to the presence of Griffith Park. While Griffith Park provides quality recreational land to the area, it is not universally accessible to all of the residents of Hollywood. Those who do not have access to personal transportation will find it difficult to enjoy the trails and land at Griffith Park. Furthermore, this plan outlines no future goals to create additional open space. The proposed changes, Subarea 4:1 and Subarea 24, are simply rezoning of existing park space.

27-4  
Cont.

We commend the plan for recognizing the lack of sufficient community and neighborhood parks in the area. However, we would like to see a further commitment to the development of more spaces like this. It is in the city's best interest to invest in evenly distributed park space. Studies indicate that access to green space contributes to the both the health and psychological well-being of a city's citizens (Gidlof-Gunnarsson et al., 2007). Buildings surrounded by more green space also exhibit lower property and violent crimes (Kuo et al., 2001). We suggest ensuring that new community gardens, public parks, and other green spaces are distributed evenly across varying ranges of densities and incomes. Community gardens should be located near high-density, low-income areas to ensure that food security and health issues can be improved.

#### d) *Prevent Excessive Wastewater Pollutants*

We also encourage the installment of screens over the catch basins in the Proposed Plan area. Marine debris is a growing problem with significant negative impacts on marine life, the economy, and human health. An estimated 80% of the debris found in the Pacific Ocean comes from on-shore sources, including trash that washes down streets into storm drains and through the watershed out into the ocean. The Los Angeles area, with its proximity to the ocean and the Los Angeles River, has a responsibility to take all precautions possible to prevent the flow of trash from the streets of L.A. into the ocean. While the City has stated its plans to install about 44,000 Catch Basin Opening Screen Covers throughout the city, we strongly encourage the City of Los Angeles to prioritize this endeavor, assuming funds permit.

27-5

### 3. Conclusion

In sum, we appreciate the plan's dedication to addressing environmental concerns. We strongly encourage the inclusion of mixed housing, improved bicycle infrastructure, additional green space, and provision of catch basins screens in the Final Environmental Impact Report.

27-6

Thank you in advance for your serious consideration of the above recommendations.



Respectfully submitted,

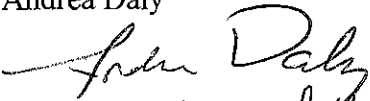
Greer Gosnell



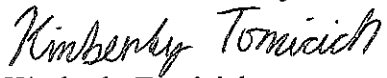
Briana Bergstrom



Andrea Daly



Darryl Yip 



Kimberly Tomicich



Brian Treanor, Ph.D.

The members of the Loyola Marymount University Environmental Action Team

Letter 28

Alan Kishbaugh  
8136 Cornett Drive  
Los Angeles, CA 90046  
(323) 654-3399

Via USPS and email

June 1, 2011

Ms Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on the Hollywood Community Plan Update  
DEIR Case No. EIR-2005-5158-EIR  
State Clearinghouse Number 2002041009

Dear Ms Hewawitharana:

Thank you for the opportunity to provide written comments to the Planning Department of the City of Los Angeles with regard to the Hollywood Community Plan Update Draft Environmental Impact report.

As Chair of the Mulholland Scenic Design Review Board, a body brought into existence with the passage of the Mulholland Scenic Parkway Specific Plan

#167,943 in 1992, I am herewith submitting this letter, which represents the combined comments and concerns of our entire board.

The Draft EIR for the Hollywood Community Plan update fails to consider impacts, either in the Land Use or Transportation sections, of the Class II Bikeway on Mulholland Drive to the Mulholland Scenic Parkway Specific Plan, specifically as it relates to the Core Trail (Section 8 of the Specific Plan).

28-1

As stated in the Specific Plan, the Core Trail, where feasible, "shall consist of two distinct, generally parallel pathways separated by vegetation, topography or other means. It shall not be paved with a hard surface. One pathway shall be designated for use by hikers and joggers and the other designated for use by equestrians."

Policy M.1.43 of the Hollywood Community Plan Update seeks to "maintain existing planned bicycle routes" which includes a Class II Bike Lanes on Mulholland Drive between Laurel Canyon Boulevard and the 101 Freeway.

The Streets and Highway Code Section 890.4 defines a Class II Bikeway (Bike Lane) as a facility that is provided primarily for bicycle travel and includes a striped lane for one-way bike travel on a street or highway.

First, the Class II Bikeway on Mulholland Drive is not presently striped and therefore must first be striped, before it is further maintained as the Community Plan policy seeks.

Second, given the physical constraints of the Mulholland Drive right-of-way, the EIR must consider how the striping and maintenance of the Class II Bikeway on Mulholland Drive would complement or be synchronized with the development of the Core Trail. This would require coordination with various public agencies, including the Bureau of Engineering (Street Services), the Department of Transportation and the Department of City Planning, and should involve consultation with the Mulholland Scenic Parkway Specific Plan Design Review Board and the Santa Monica Mountains Conservancy.

The result of this coordination and consultation would result in the development of the "Modified Street Standard," in an effort to better reflect Mulholland's use and existing condition (a scenic highway and Class II Bikeway), as well as accommodate the development of the Core Trail. This "Modified Street

Standard” must be included as part of the Final EIR for the Hollywood Community Plan.

Sincerely,

Alan Kishbaugh, Chair  
Mulholland Scenic Design Review Board

Cc: City Council President Eric Garcetti  
City Council Member Tom LaBonge  
City Council Member Paul Koretz  
LA County Supervisor Zev Yaroslavsky  
City Director of Planning Michael LoGrande  
Executive Director, J.T. Edmiston, Santa Monica Mountains Conservancy  
Mulholland Scenic Design Review Board



June 1, 2011

Letter 29

Ms Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

[Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

RE: Comments on the Hollywood Community Plan Update DEIR  
Case No. EIR-2005-5158-EIR  
State Clearinghouse Number: 2002041009

Dear Ms Hewawitharana:

Outpost Estates includes the approximately 450 single-family homes in the Hollywood Hills between the Hollywood Bowl and Runyon Canyon Park, north of Franklin Avenue. Our neighborhood was developed in the 1920s and is one of Hollywood's premiere residential areas. The Outpost Homeowners Association (OHA) has been steadfast in its efforts to protect and enhance the character of the neighborhood.

We have reviewed the Draft EIR for the Hollywood Community Plan and offer the following comments.

We support many of the goals of the proposed Plan as they relate to improving the pedestrian environment in Hollywood and encourage alternate modes of transportation. Development adjacent to the Metro Rail stations is appropriate, but we question the overall density of development allowed by the proposed Plan.

The Draft EIR confirms that streets in Hollywood are already extremely congested today and they will be significantly impacted by the level of development allowed by the Hollywood Community Plan. It notes that 41% of the streets in Hollywood are over capacity today. It forecasts that 58% will be over capacity in the future. As congestion of arterial streets increases, drivers will increasingly seek alternative commute routes through our neighborhood. Outpost is already a cut through route for traffic between the San Fernando Valley and Mid-Wilshire/Beverly Hills and any additional traffic added to the Cahuenga Pass will send more traffic through our neighborhood. The mitigation measures in the document are not adequate to protect Hollywood's residential neighborhoods.

29-1

A neighborhood traffic management program with funding for LADOT staff and neighborhood traffic management features must be included in the Plan.

29-2

We request that Outpost Drive be re-designated as a Local Street rather than a Collector. We understand that this change would not result in any physical change to the roadway, but it would set a policy guideline that Outpost Drive, a winding, 36-foot wide street without sidewalks along

29-3

most of its length, should not be used by long-distance commute traffic. Outpost Drive is lined with single-family homes, many of which are only a few feet from the curb.

29-3  
cont.

Attached is a graphic illustrating some additional comments. We request that the area labeled 3:1 D on the graphic be restricted to a two-story, 30 foot height limit. This area currently includes the two-story Highland Gardens Hotel and it abuts the back yards of single-family homes on the 1800 block of Outpost Drive. It would create a significant negative impact on the residents of these homes, were taller multi-family developments built behind them.

29-4

We also request that a policy statement be added to the Plan's land use section noting that the two single-family homes at the foot of Outpost Drive at Franklin Avenue are intended to remain single-family homes and that they should be removed from the Hollywood Redevelopment Project Area.

29-5

We would also request that all maps in the Hollywood Community Plan be revised to delete what appears to be a roadway between Outpost Circle and Fitch Drive. No such roadway exists and we do not want one to be built in the future should the Highland Gardens Hotel be redeveloped.

29-6

Thank you for the opportunity to comment on the Draft EIR. Please notify us of any upcoming hearings on the Community Plan itself, as we intend to raise our concerns with the Plan to the appropriate decision makers as they review the Plan and take action on it.

29-7

Sincerely,

Outpost Homeowners Association



Marla Strick  
Secretary

CC OHA Board  
Councilmember Tom LaBonge

Attachment

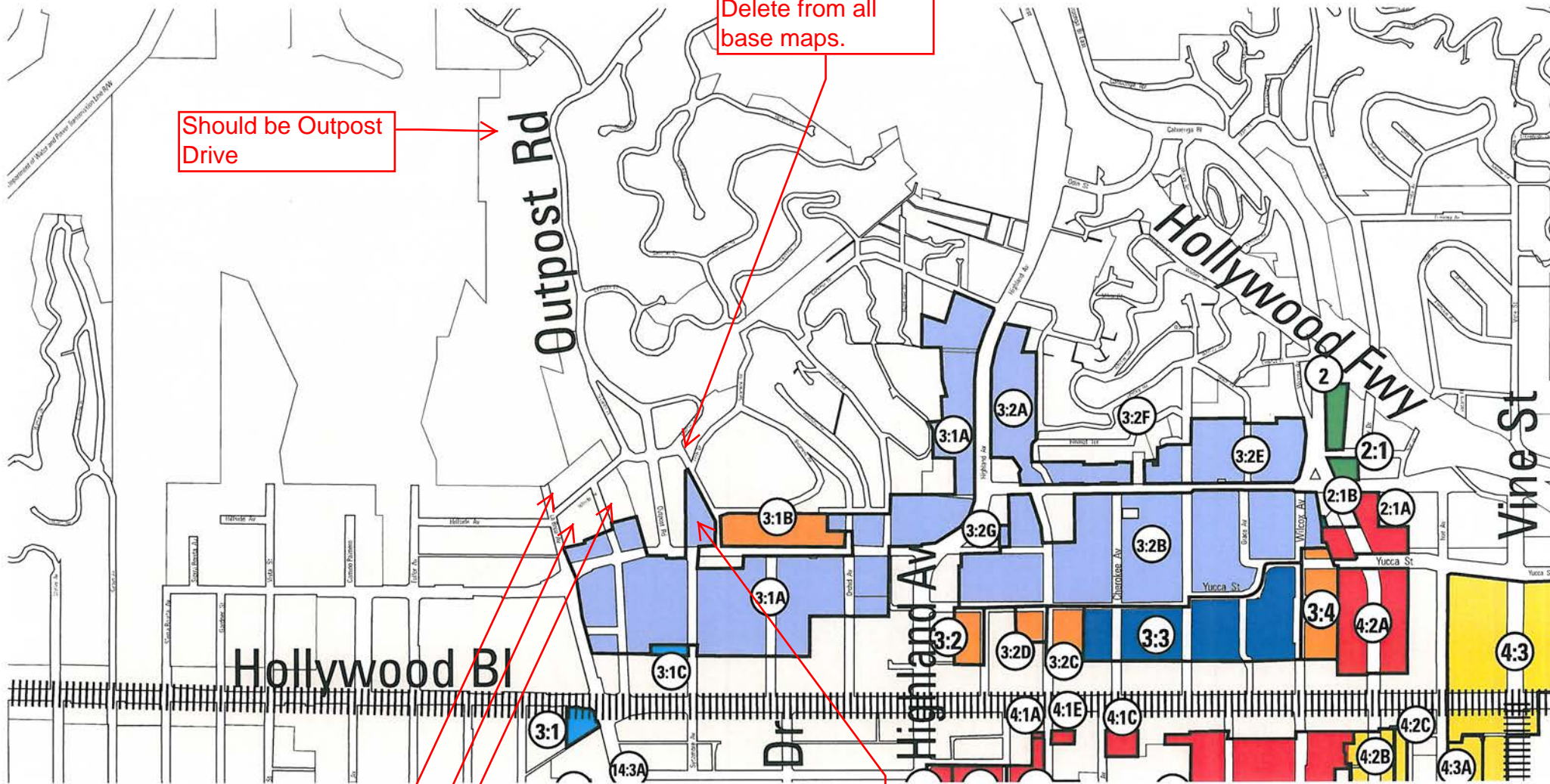
Should be Outpost Drive

This roadway between Outpost Circle and Fitch Dr does not exist. Delete from all base maps.

Why is this multi-family block not in 3:1A?

This sub-area north of Franklin should be area 3:1D and limited to two-story height limit

Comments of Outpost HOA Board



June 01, 2011

Page 1 Of 2

LOS ANGELES DEPARTMENT OF CITY PLANNING  
200 North Spring Street, Room 667 & 701  
Los Angeles, CA 90012

Attention : Ms. Mary Richardson [Mary.Richardson@lacity.org](mailto:Mary.Richardson@lacity.org)  
Mr. Kevin Keller [Kevin.keller@lacity.org](mailto:Kevin.keller@lacity.org)  
Mr. Srimal P. Hewawitharana [Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

RE: RESPONSE TO THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT  
HOLLYWOOD COMMUNITY PLAN UPDATE  
ENV-2005-2158-EIR CPC No. 97-0043  
State Clearing House No. 2002041009  
Council Districts 4,5, and 13

Dear Ms. Richardson, Mr. Keller and Mr. Hewawitharana:

First let me thank you for the presentation given to the Hollywood Studio District Neighborhood Council on April 26, 2011. We serve on the afore mentioned HSDNC PLUM Committee and Councilman Eric Garcetti’s Design Review Committee. We are residents in Hollywood since 1977. As professional architect and commercial designers and former residents of Manhattan, we, for the most part, have been supportive of development and are not strangers to density.

Our concerns and oppositions are as follows:

- 1) **Melrose Avenue Zoning and Density:** The Melrose Hill HPOZ – that may be expanded with the recent survey just taken - is in jeopardy with the proposed density/ heights proposed. Melrose Hill HPOZ - east of Western Avenue to the 101 Freeway - has no alleys or buffer zones between the commercial properties on Melrose. The existing heights are a result of previous neighborhood efforts to minimize nuisance impacts on the area. The designations proposed will invade back yards, destroy privacy, block sun, increase noise and diminish significantly the quality of the residential environment. Since there are no alley ways or other buffers it would be appropriate to let the existing height limitations remain. Projects abutting HPOZ areas should be required to come before the HPOZ Board and notification given to all HPOZ residents. Under no circumstance should a lot or development in or adjacent to any HPOZ qualify for “By Right Development.” HPOZ Areas are examples of the history of the city – and as such –should be a valued and protected area.
  - 30-1
  - 30-2

**Note:** Similar conditions of abutting properties without commercial buffers from R-1 structures exist in the Los Feliz Area also. “No Buffer Properties” should be exempt from “By Right” development.
- 2) **The proposed increase in density is based on year 2000 SCAG figures and is in direct conflict with the recent Census that shows a decreased population in Hollywood (8.9% decrease in our Hollywood Studio District Neighborhood Council).**
  - 30-3

The City General Plan Framework shows the city already has enormous untapped potential for population and housing expansion – In the Hollywood Studio District Neighborhood Council Area – the existing housing stock and that which is already approved to be built - exceeds the reports projections. Population growth is misrepresented resulting in substantial and cumulative skewed findings .
- 3) **Setting Heights by use of FAR calculations** sound reasonable until you find that the three (3) levels of above grade parking is not used in the calculations. (Above grade parking was originally deemed not to be desirable and still should be reconsidered.) If above grade parking is permitted – count it in the FAR. Ground Level parking should be behind retail and not be exempt from design review. Below Grade parking should be encouraged . Perhaps added entitlements of reduced parking should apply only to projects with below grade parking.
  - 30-4
- 4) **Retail stated configuration of 25’ depth is a particular problem.** Any one knowledgeable about retail would require a minimum of 45 feet. Hollywood has long been at a disadvantage in attracting retail occupancy due to the lack of depth in it’s building stock. This criteria is severely important to the retail future. The stated depth determined should be stated as a minimum – Otherwise it will become the norm and it is a disadvantage in attracting retail.
  - 30-5



- 5) Abandoning Height Limits after you travel East of the 101 Freeway along Hollywood and Sunset Blvds. coupled with Bonus Densities and often Increased entitlements by way of piece meal application seems irresponsible to the Eastern corridor of Hollywood. Add that to limited notification of neighboring property owners and tenants with all else being “by right” - Where is the City’s responsibility to those neighborhoods ? The Design Guidelines have no teeth and the precedent that these policies will make is an abdication of responsibility by The City with little concern for the people in the neighborhoods. As members of Design Review Committees in Hollywood for 25 Years ( Committees formerly under the CRA’s guidance and since Michael Woo - at the request of the 13<sup>th</sup> Council Person) – Design Review has helped the quality of projects in Hollywood. Review is not always successful – but context relationships, scale, pedestrian experience and other “quality issues “ are critical to the results of development. Good architecture helps to define a “Sense Of Place” and too many poorly designed projects are currently approved “By Right”. Surely the Planning Department and The City has a responsibility to the support aesthetics of Hollywood (and the City at large). Those sensibilities come to light by review of projects

30-6

30-7
- 6) Western Avenue between Melrose and Santa Monica is proposed for a 300% increase in FAR and for RASA. Santa Monica Blvd. is proposed for a 600% increase in FAR and also RASA. These seem grossly excessive and most areas are remote from rail transit. Actual projects – if any – will tower over single family and low density multi-family rear yards inches away. This excessive increase could promote speculation and foster instability.

30-8
- 7) To me this EIR reads as a document to support transit - which is a good thing – but it is not density based on population growth. It also says “single family uses are primarily in the hills and multi-family uses are in the flat lands” - There may be more apartments in the flat lands – but sheer geography makes this look inaccurate.

30-9
- 8) As far as transit is concerned – the thrust for public transit is a good intent for the long term – but it will take time to build, to make connections easy and in the meantime – planning for parking garages would help the short term – say the next 20 years – and support the communities.

30-10
- 9) Not documented is The City’s current state of infrastructure. Before increased densities are permitted, Demonstrated Unused Infrastructure Capacity should be included in this report. Water shortages, Electrical Brown Outs have occurred and if earthquake or interruption of sources /services occurred, The City would be in real crisis.

30-11
- 10) In a broad sense, the Place of Hollywood is the Hollywood Hills and the foothill community that stretches beyond to Downtown . It is time to protect Hollywood residential neighborhoods. Emphasize quality infill design and development over inflated proposed densities, so that every project , no matter how badly designed or inappropriate is not “By Right”.

30-12
- Another intrinsic character of Hollywood is the Hollywood Hills. This density will impact the view corridors by narrowing them drastically. Once lost , they will never return.

30-13
- Recent economic / growth trends are optimistically projected in light of the Year 2000. Unemployment – has not risen –but stymied. Significantly, under employment continues ( just look at the cut backs by The City of Los Angeles). Banks are still not lending to even the most pristine developers. Approved long term projects are selling their entitlements. Nationally, the debt is larger than ever. While we are optimistic and know these things occur in cycles, Hollywood would be better served with promotion of quality infill and building with better quality controls that are built into the process by the planning and governmental agencies.

30-14

Thank you for your consideration of these issues.

Sincerely,

Pablo and Jackie Ruiz

Letter 31  
**Craig Lawson & Co., LLC**  
**Land Use Consultants**

May 31, 2011

VIA ELECTRONIC MAIL

Srimal Hewawitharana  
Environmental Review Coordinator  
Department of City Planning  
City of Los Angeles  
200 North Spring St., Room 750  
Los Angeles, CA 90012  
[Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

Re: Draft Environmental Impact Report for the Hollywood Community Plan Update  
ENV-2005-2158-EIR

Dear Ms. Hewawitharana:

Thank you for inviting us to submit comments on the Draft Environmental Impact Report for the Draft Hollywood Community Plan Update (“Hollywood DEIR.”) We are pleased that the City Planning Department is moving forward with the Hollywood DEIR with an extensive community outreach process. This comment letter is focused on the Hollywood DEIR’s Land Use Section (Section 4.1) and the land use recommendations under the Draft Hollywood Community Plan Update.

31-1

**1. Pending Projects Should be Grandfathered from Inconsistent Development Standards under the Community Plan Update.**

While we generally agree with the land use recommendations for the properties within the Plan Update area, we think it is important to provide an appropriate transitional rule to take into account projects that are consistent with the existing Hollywood Community Plan and have been pending in the entitlement pipeline for a long period to ensure they are not prejudiced by the adoption of the Community Plan Update. For example, the entitlements for the proposed Hollywood & Gower Mixed-Use Project, at the southwest corner of Hollywood Boulevard and Gower Street, have been pending with the City Planning Department since July 24, 2008 (under Case Nos. VTT-70119-CN, CPC-2008-3087-ZC-HD-ZAA-SPR and ENV-2007-5750-EIR)(“Hollywood & Gower Project.”) The Hollywood & Gower Project proposes a new 21-story mixed-use high-rise development with 176 residential units over 7,200 square feet of ground floor retail uses fronting on both Hollywood and Gower, which would result in a total FAR of 4.5:1, including a 0.2:1 FAR for the commercial/retail portion of the project. The Notice of Preparation for the Hollywood & Gower Project’s Draft EIR was released on January 28, 2008, followed by the release of the Draft EIR on October 15, 2009 and the release of the Final EIR and Notice of Availability on July 10, 2010. The City Council approved a Zone/Height District change for the project on May 17, 2011 that includes development standards that are different than those proposed in the Draft Community Plan Update. Given that this project has been in process for over three years, it would not be fair to subject this project (and other similarly pending projects) to different development standards.

31-2

**2. The Proposed Minimum Retail FAR for Mixed Use Projects is Too High for Smaller Sites.**

The current version of the Draft Hollywood Community Plan Update (attached to the Hollywood DEIR as "Appendix A") designates the Hollywood & Gower Project Site as Subareas 4:4A and 4:4 (see Appendix A.4, Draft Land Use Zone Map,) and recommends a Zone Change and Height District Change to the [Q]C4-2D-SN and [Q]C4-2D Zones, respectively, to permit a 4.5:1 maximum FAR for commercial only or mixed-use projects, and a minimum 0.5:1 FAR for the commercial component of the project (see Appendix A.5, Draft Matrix of Land Uses.) The maximum proposed FAR for the Hollywood & Gower Project is consistent with the 4.5:1 FAR recommendation; however, the commercial portion of the Project would not meet the minimum 0.5:1 FAR.

31-3

The Hollywood & Gower Project presently provides 7,200 square feet of ground-floor retail, which, we believe, is appropriate given the size of the property (only 43,890 square feet in size), its corner location, and the proposed Project design. To meet the minimum commercial 0.5:1 FAR requirement, almost 22,000 square feet of commercial space would need to be provided (an increase of more than 14,000 square feet) which would be both economically and physically infeasible for such a small lot. The additional commercial space would be difficult to lease as the space would either require extra depth for the ground floor spaces or a second level of retail space, both of which would not be feasible from a leasing standpoint.

31-4

Such minimum FAR requirement for commercial spaces in mixed-use projects would force more retail on projects that cannot be feasibly leased. This will only result in empty retail spaces. Furthermore, it would be in conflict with the goals and objectives of the Proposed Hollywood Community Plan, which include "Improving the function, design and economic vitality of commercial areas" and "Preserving and strengthening commercial developments to provide a diverse job-producing economic base." (Page 4.1-6.) Alternatively, we suggest revising the land use recommendation to allow more flexibility in the minimum FAR requirements for commercial space, depending on the physical characteristic of the lot. For example, the minimum retail requirement could be based on a sliding scale formula which would depend on the lot size or the amount of street frontage available on the lot. In such cases, a property that covers an entire block or that is larger in size would be an appropriate location to require the 0.5:1 minimum retail FAR.

31-5

Thus, we feel the recommendations in Appendix A of the Hollywood DEIR (or the Draft Hollywood Community Plan Update) should be revised to allow exceptions to the minimum commercial FAR rule for smaller lots and for projects that have been in the pipeline for a long period of time.

31-6

Thank you for your consideration of our requests and comments. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Craig Lawson*

Craig Lawson  
President

c.c. Michael LoGrande, Director of LA City Planning  
Kevin Keller, LA City Planning Department  
Mary Richardson, LA City Planning Department



# Forest Lawn®

MEMORIAL-PARKS & MORTUARIES

1712 South Glendale Avenue • Glendale, CA 91205

1-800-204-3131 • ForestLawn.com

**VIA U.S. MAIL, FACSIMILE & EMAIL**

Srimal.Hewawitharana@lacity.org

June 1, 2011

Ms. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

Re: Hollywood Community Plan Update Draft EIR (ENV-2005-2158-EIR)

Dear Ms. Hewawitharana:

Forest Lawn Memorial-Park Association respectfully requests that the Hollywood Community Plan update acknowledge Forest Lawn Memorial-Park - Hollywood Hills, the existing cemetery use on Forest Lawn Drive that the City approved in 1948. The proposed Hollywood Community Plan and associated Draft EIR appear to suggest that all land in the Community Plan Area designated as Open Space consists of parks and other recreational areas. (See, for example, page 4.1-4 of the Draft EIR). However, although the Forest Lawn Memorial-Park - Hollywood Hills is designated with an Open Space land use designation, the approximately 444-acre property is a dedicated cemetery. Maps 35 and 36 within the proposed Hollywood Community Plan appear to indicate that the cemetery property and adjacent undeveloped property also owned by Forest Lawn to the west of the Memorial-Park are parkland and part of Griffith Park. Forest Lawn requests that this be clarified in the Final EIR and the final Hollywood Community Plan.

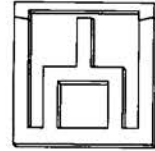
32-1

Additionally, the City recently published the Draft EIR for the Forest Lawn Memorial-Park - Hollywood Hills Master Plan (ENV-2007-1060-EIR) in February 2011, and Forest Lawn is seeking a public benefit approval and related entitlements to continue to serve the community in the years to come. Thus, we would appreciate acknowledgment of the long-term existing cemetery use in the Hollywood Community Plan.

32-2

Very truly yours,

Darin B. Drabing  
President and Chief Executive Officer



L.T. Properties

May 31, 2011

Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Hollywood Community Plan & Urban Design Guidelines

Dear Ms. Hewawitharana

I am thank full for the opportunity to comment on the Hollywood Community Plan and The Urban Design Standards and Guidelines. I would like to comment in particular to my property at 1750 N. Argyle Ave. There are very specific concerns that relate to my property specifically that I would like to address.

My property is located at 1750 N. Argyle Ave. Directly North of the proposed Clarett project which will consist of a shopping center and approximately 1000 apartments. It also sits 1/2 a block North of the new W Hotel, one block South of an office building approximately 6 stories tall and across the street from both the Pantages Theater (which has a proposed 10 story tower addition) and a large tower proposed by Argent Ventures and Millennium Partners. With no stretch of the imagination this is a fiercely commercial area in the heart of the entertainment district with large buildings in all directions.

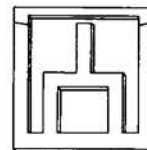
In the current guidelines, the CRA gifts Argent Ventures / Millennium Partners a "150/220 ft/ unlimited" designation. The Clarett Group a "105/150ft" designation and the office buildings a "60ft" designation while simultaneously reducing my lots designation to a 30 ft maximum. This is both inconsistent with the City of Los Angeles Planning Departments designations, but also inconsistent with designations in all directions of my lot.

Additionally, my lot has a split zone, which should be addressed. The front portion has a commercial designation, while the back portion is residential. Since Argyle is a commercial avenue. With shopping centers, hotels and some of the highest high designations in the neighborhood, I feel that my lot should not only be given a commercial zoning but also have the hight restrictions eliminated.

The Guidelines also attempt to put restrictions and rules on new parking developments. This will only cause more problems for redevelopment. The guidelines continue to state that no parking will be allowed on any lot where a historic building was removed. There is no reason for this and in the event of a disaster, can only further harm a property owner.

33-1

33-3



L.T. Properties

As they should be, historic properties are a big focus in the guidelines because of their character adding features. However, historic properties require a great deal of creativity for adaptive reuse and redevelopment. We look to the Secretary of Interior's Standards as a guide. It is unnecessary to add additional regulations that make the job of creatively and successful redeveloping a historic site more difficult.

33-2  
cont.

Thank you for your time and consideration in the above mentioned matters.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Vytas Jusky'. The signature is fluid and stylized, with a long horizontal stroke extending to the left.

Vytas Jusky  
L.T. Properties

cc: Councilmember Eric Garcetti  
Kelli Bernard, CD13

Letter 34

**NBCUniversal**

VIA EMAIL

June 1, 2011

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: Hollywood Community Plan Update Draft EIR (ENV-2005-2158-EIR)

Dear Ms. Hewawitharana:

It has come to our attention that the proposed Hollywood Community Plan contains the following Mobility Plan policies:

“Policy M.1.80: Support the construction of a new multi-lane roadway to extend from the intersection of Barham Boulevard/Forest Lawn Drive through the NBC/Universal site to Coral Drive adjacent to the 101 Freeway.

Policy M.1.81.: Restripe Barham Boulevard to allow three southbound lanes and two eastbound lanes within the existing roadway.

Policy M.1.82: Restripe Cahuenga East south to the 101 Freeway on-ramp near Pilgrim Bridge to provide two lanes on Cahuenga East between the 101 on-ramp and the 101 Barham Boulevard off-ramp and from there, three lanes northbound.

Policy M.1.83: Work with CalTrans and other regional agencies to improve the connection between the 101 Freeway and the 134 Freeway. Pursue the addition of connector ramps to connect the 101 Freeway south of this interchange with the 134 Freeway east of this interchange, to relieve the overflow of regional traffic through local streets, such as Forest Lawn Boulevard, Barham Boulevard and Lankershim Boulevard.”

34-1

Policies M.1.80 and M.1.81 are proposed project design features/mitigation measures of the NBCUniversal Evolution Plan project, a project for which the Draft EIR was circulated by the City from November 2010 to February 2011 and the Final EIR is being prepared. (Policy M.1.81 refers to two eastbound lanes which we assume is meant to be two northbound lanes.) We would like to point out that these traffic improvements have not been approved by the City (or the County) nor has the proposed Evolution Plan EIR been certified. As such these design features/mitigations measures are still pending before the City (and County) and should not be included within the proposed Hollywood Community Plan Draft EIR as guaranteed or committed improvements. Further, Policy M.1.80 refers to a proposed roadway on private property that is not within the Hollywood Community Plan area.

In addition, it is our understanding that Policy M.1.83 is inconsistent with Caltrans' suggested approach for addressing the 101/134 interchange. NBCUniversal is currently working with Caltrans to prepare a Project Study Report (PSR) that would address this interchange in a manner different from proposed Policy M.1.83. Policy M.1.82 is part of overall improvements to the 101 corridor being evaluated by Caltrans. A PSR has not been prepared for those improvements.

We respectfully recommend that Policy M.1.80 be removed from the proposed Hollywood Community Plan and that Policy M.1.83 be removed or revised to reflect Caltrans' suggested approach for addressing the 101/134 interchange. With regard to Policy M.1.81, again, we note that the improvement should not be included as a guaranteed or committed improvement given the fact that the proposed NBCUniversal Evolution Plan EIR has not been certified and the NBCUniversal Evolution Plan and related traffic improvements have not been approved by the City (or County).

Respectfully,



Tom Smith  
SVP, West Coast Real Estate  
NBCUniversal





# PROPOSED HOLLYWOOD COMMUNITY PLAN UPDATE

2 messages

Brian Folb <Brian@hollywoodoffices.com>

Mon, Mar 7, 2011 at 12:08 PM

To: "Srimal.Hewawitharana@lacity.org" <Srimal.Hewawitharana@lacity.org>

Cc: "alison.becker" <alison.becker@lacity.org>, Angela Motta <angela.motta@lacity.org>

Hi Srimal,

We are the original developers & owners of the high rise office buildings located at 6464 & 6565 Sunset Blvd. Hollywood, CA. 90028. In reviewing the proposed Community Plan Update, we are concerned about significant inconsistencies in historical designations given to certain properties & not to others & the resulting impact on future plans to redevelop these properties. Specifically our building located at 6464 Sunset has been given a historical designation of 1970's era architecture, while many (if not most) of the other high rise buildings in this area built during the same time period were given no such designation.

35-1

We are concerned this designation will place on unfair burden on our ability to redevelop our property in the future. When I spoke to Alison Becker about this several months ago, she indicated significant changes would be made with respect to the historical designations in the proposed Hollywood Plan & this situation regarding our 6464 Sunset Building would be corrected. Since we have yet to see these corrections, I felt the need to put on record our ongoing concern about this matter.

The favor of a reply with some kind of assurance with regard to the correction of this issue would be appreciated.

Thank you

Brian Folb

PARAMOUNT CONTRACTORS & DEVELOPERS, INC.

6464 Sunset Blvd., Suite 700

Hollywood, CA 90028

p. 323.462.6727

f. 323.462.0863

[www.hollywoodoffices.com](http://www.hollywoodoffices.com)

Kevin K. McDonnell  
Direct: (310) 201-3590  
Fax: (310) 712-3316  
KKM@jmbm.com

Letter 36

1900 Avenue of the Stars, 7th Floor  
Los Angeles, California 90067-4308  
(310) 203-8080 (310) 203-0567 Fax  
www.jmbm.com

Ref: 71866-0001

May 27, 2011

**VIA E-MAIL AND HAND DELIVERY**

Srimal Hewawitharana, Environmental Review  
Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Case No. EIR-2005-5158-EIR  
State Clearinghouse Number: 2002041009  
Draft Environmental Impact Report ("EIR")  
Comments on Hollywood Community Plan Update

Dear Srimal :

Our office represents Quite Lion 1, L.P., a property owner within the Hollywood Community Plan (the "Plan") area. Our initial review of the Draft EIR reveals substantial analytical gaps, and we offer the following comments.

**1. The Draft EIR Does Not Address Off-Street Parking Demand or Capacity.**

Section 4.5 (Transportation) of the Draft EIR describes on-street parking and its potential effects on traffic flow, but neglects to provide any meaningful discussion regarding the demand for, and capacity of, off-street public parking. Thus, the Draft EIR appears to ignore both the Initial Study, Section XV.f of which states that a potentially significant impact could occur regarding parking capacity, as well as clear policies within the Plan related to this issue. For example, Policies M 1.99-100, 105, and 106 collectively recognize that the loss of public parking through development in the Regional Center and elsewhere represents a potential impact on parking capacity, and that the City must encourage shared parking provided through new development, as well as the development of new off-street parking resources. However, the Draft EIR fails to consider overall parking demand in relation to existing and planned development, as well as whether and how these Plan policies could mitigate such an impact. Examples of potential mitigation measures include identification of opportunity sites for parking structures or other facilities, or identifying where the provision of additional public parking could

36-1

alleviate neighborhood intrusion by vehicles. Examples of such parcels include those immediately adjacent to established commercial corridors, such as along Sunset Boulevard.

The City must revise the transportation analysis to include a straightforward parking impact analysis, and to provide enforceable mitigation measures to address this impact. The lack of such an analysis renders the Draft EIR inadequate, as it deprives decision makers in an auto-dependent city of crucial information regarding the potential effects of the Plan.

## **2. Neither the Specific Plan Nor the Draft EIR Addresses Compatibility with Land Uses in Adjacent Jurisdictions.**

Section 4.1 (Land Use) of the Draft EIR fails to address potential inconsistencies between land use designations in the Plan Area and those in adjacent jurisdictions, such as West Hollywood. Although neither policies in the Plan nor mitigation measures in the Draft EIR can affect parcels outside the City, both documents can address potential inconsistencies presented by parcels in Los Angeles. According to page 4.1-8 of the Draft EIR, the purpose of some of the land use changes in the Plan is the minimization or elimination of non-conforming uses or lots. However, neither the Plan nor the Draft EIR identifies such properties. Particularly problematic are those that not only abut City boundaries, but are in fact divided by those boundaries. Further, those lots included within the block adjoining the City boundaries present opportunities for a proper zoning and land use transition from commercial to multi-family residential to single-family residential. Such transitions do not occur consistently in the Plan Area. The Plan does nothing to remedy those inconsistencies, even where the existing development provides those transitions, and the Draft EIR fails to evaluate them.

This condition occurs with regularity on the north side of Sunset Boulevard from Cory Avenue to Marmont Lane. Many of these properties are bisected by the Los Angeles/West Hollywood boundary. In many cases, the portion of the properties within Los Angeles are designated for residential use, while the portions within West Hollywood are designated for commercial use. Many of the properties adjoining the boundary properties to the north and located in the same block fronting Sunset Boulevard are designated for single-family residential use, but developed with multi-family residential uses.

Neither the Plan nor a Draft EIR mitigation measure could correct this problem by altering the designation of the property within West Hollywood, nor would such an action make sense in light of the established commercial corridor within which these properties are located. Rather, the Plan or the Draft EIR could address the inconsistency by designating the portions of those dual-jurisdictional properties within Los Angeles as commercial, to allow development that conforms with the character of the surroundings of the property. A proper zoning and land use transition could be completed by designating those northerly adjoining lots as multi-family residential, consistent with their actual uses.

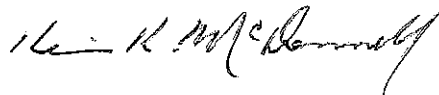
36-1  
Cont.

36-2

Srimal Hewawitharana  
May 27, 2011  
Page 3

We look forward to the provision of the additional analysis requested, which will cure the significant analytical gaps in the Draft EIR and provide the information necessary for informed decision making by the City. Please contact our office with any questions or concerns, and please provide this office with copies of all subsequent notices issued with respect to the Plan and the Draft and Final EIRs.

Very truly yours,



KEVIN K. MCDONNELL of  
Jeffer Mangels Butler & Mitchell LLP

KKM:neb

cc: Daniel M. Scott, via e-mail  
Kevin Keller, via hand delivery  
Mary Richardson, via hand delivery

See FEIR Appendix for Attachments to this letter.



333 South Hope Street | 43rd Floor | Los Angeles, CA 90071-1422  
213-620-1780 office | 213-620-1398 fax | [www.sheppardmullin.com](http://www.sheppardmullin.com)

**James E. Pugh**  
Writer's Direct Line: 213-617-4284  
[jpugh@sheppardmullin.com](mailto:jpugh@sheppardmullin.com)

May 26, 2011

Our File Number: 23DF-151670

Ms. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

**RECEIVED**  
CITY OF LOS ANGELES

**MAY 25 2011**

ENVIRONMENTAL  
LIMIT

Re: Draft Environmental Impact Report for the Hollywood Community Plan

Dear Ms. Hewawitharana:

This firm represents Sunset Studios Holdings, LLC ("Sunset Studios") with respect to its property located at the northwest corner of Sunset Boulevard and Bronson Avenue (the "Site") in Hollywood. Please see Exhibit 1: Site Location. The Site is within the Hollywood Community Plan (the "Community Plan") area of the City of Los Angeles (the "City") and is subject to certain changes per the Community Plan update. Sunset Studios is concerned that the land use and zoning designations for the Site, as proposed in the draft Community Plan, could stifle future development plans. Therefore, please review our comments below and consider integrating our requested changes in the adopted Community Plan and its Final Environmental Impact Report (the "Final EIR").

The Site is currently improved with a small security guard house and a perimeter block wall and fencing. The Site is primarily used as overflow parking for the Sunset Bronson Studios facility, which is located across Sunset Boulevard. The Site is approximately 67,300 total square feet ("SF") and is comprised of two separate parcels. The south parcel's land use designation is Highway Oriented Commercial and it is zoned C4-1-SN. The north parcel's land use designation is Highway Oriented Commercial and it is zoned P-1. Accordingly, the south portion of the Site allows for retail and office uses and the north portion of the Site allows for below grade and surface parking uses.

The Draft Environmental Impact Report (the "DEIR") for the Community Plan update proposes changes for both portions of the Site. The DEIR has separately designated the southern portion of the Site as within "Subarea 6:1" and the northern portion of the Site as within "Subarea 6:4." Please see Exhibit 2: Subarea Designations. These subarea titles correspond with the following proposed land use and zoning changes.

Ms. Hewawitharana  
May 26, 2011  
Page 2

On the southern parcel, the DEIR proposes to change: (1) the land use designation from Highway Oriented Commercial to Regional Center Commercial; and (2) the zoning from C4-1-SN to [Q]C4-2D-SN.<sup>1</sup> The DEIR states that these changes would "... provide incentives for construction of commercial office uses and mixed-use with design standards."<sup>2</sup> Sunset Studios appreciates these changes and the City's effort to stimulate commercial growth within certain areas of Hollywood.

On the northern parcel, however, the DEIR proposes to change the land use designation from Highway Oriented Commercial to General Commercial.<sup>3</sup> The zoning would remain P-1 for parking uses.<sup>4</sup> In other words, the DEIR proposes only a nomenclature change that does not materially affect the permitted uses or density on the northern portion of the Site. Sunset Studios anticipates revitalizing the Site with a development plan that would creatively use both portions of the Site. Hence, adjusting the land use and zoning designations to be consistent across the Site would be good planning and is a ripe issue for the Community Plan update. Therefore, we respectfully request that the City revise the DEIR and Community Plan so the land use designation on the northern portion of the Site (i.e., Subarea 6:4) is Regional Center Commercial and the zoning is [Q]C4-2D-SN.

At this time, we understand that the City's proposed "Q" conditions and "D" development limitations (as noted above in the proposed zoning) would allow for a 4.5:1 Floor Area Ratio ("FAR") in commercial-only or mixed-used projects and prohibit residential-only projects.<sup>5</sup> If the City's qualifications and limitations go beyond this understanding, then Sunset Studios would reconsider its support of the proposed [Q]C4-2D-SN zoning across the Site.

Nonetheless, the changes requested here would result in consistent zoning across the Site and would be consistent with the several of the Community Plan's goals and policies to promote commercial growth in the regional center. We believe that these changes are in the best interests of the City and Sunset Studios.

In addition, Sunset Studios would welcome the opportunity to discuss these requested changes with the City. Ultimately, the goal would be to ensure that the adopted land use designations and zoning for the Site are mindful of Sunset Studios' development intentions, while also being cognizant of the Community Plan's larger purposes and vision. We applaud the

<sup>1</sup> Draft Matrix of Existing, Planned and Proposed Land Use for the Hollywood Community Plan, September 30, 2009, p. 32.

<sup>2</sup> DEIR, p. 4.1-31.

<sup>3</sup> Draft Matrix of Existing, Planned and Proposed Land Use for the Hollywood Community Plan, September 30, 2009, p. 34.

<sup>4</sup> Id.

<sup>5</sup> DEIR, p. 4.1-31.

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37-3

SHEPPARD MULLIN RICHTER & HAMPTON LLP

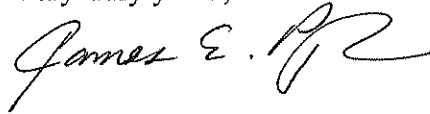
Ms. Hewawitharana  
May 26, 2011  
Page 3

City's effort to update the Community Plan and intend to be engaged as a key stakeholder until it is adopted.

37-3  
Cont

Thank you for considering these comments. Please do not hesitate to contact us if you have any questions.

Very truly yours,



James E. Pugh

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

W02-WEST:1JEP2M403560838.2

cc: Kevin J. Keller, AICP  
Christopher J. Barton  
Jerold B. Neuman, Esq.

See FEIR Appendix for attachments to this letter.



RECEIVED  
CITY OF LOS ANGELES

6063 W. Sunset Blvd. Hollywood, CA 90028 (323) 467.3559

JUN 01 2011

ENVIRONMENTAL

Gentlemen:

This letter addresses what I believe is an oversight in the Planning Department's decision to not change the land use designation for lots 12 through 20 in TR 1229, M B 18-4 (lot 14 is cut into two lots). Nine of these parcels front on Harold Way, westerly of Labaig Avenue.

These lots should be designated Highway Oriented Commercial for the following reasons:

- With the exception of the portion of lot 14 that fronts on Harold Way, the current uses of all these parcels are inconsistent with their High Medium Residential designation.
- The City is aware of the planned expansion of Siren Studios (including the Complete Post property).
- The commercial use of these parcels is completely consistent with Project Goals and Objectives 1, 3, 4, 5 and 6.
- The proposed change in designation affects only 1.2 acres, resulting in a change of only 1/100<sup>th</sup> of one percent of total multi-family residential and commercial acreage in the plan area. As a result, there would be no change in the significance of the plan's impacts and no change in the analysis of project alternatives.

38-1

For the foregoing reasons, I respectfully request the enumerated parcels be redesignated to Highway Oriented Commercial.

Sincerely,

CEO/President  
Siren Productions LLC



RECEIVED  
CITY OF LOS ANGELES

JUN 03 2011

ENVIRONMENTAL

Camp Arbut

1800 OUTPOST DRIVE

LA CA 90068

May 27, 2011

310-795-4908

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

On the west side of the first block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost Circle, which is inside a hillside residential neighborhood.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,



Bob BARKER

1851 OUTPOST DR.

HOLLYWOOD, CA 90068

May 27, 2011

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENT

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

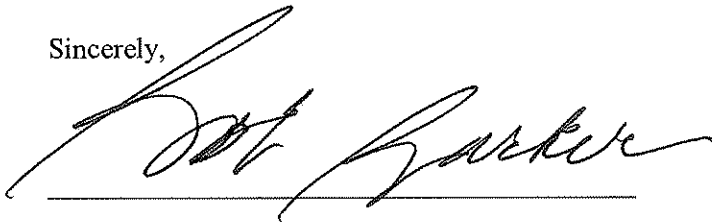
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The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,

  
\_\_\_\_\_

Letter 41

KENNETH W. E. BERRY  
1900 Outpost Drive  
Los Angeles, California 90068

May 31, 2011

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JUN 03 2011

ENVIRONMENTAL  
LIVABLE

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharma,

We are residents on the corner of Outpost Drive and Hillside Avenue, the northerly intersection of the first block of Outpost Drive above Franklin Avenue. The first and second blocks of Outpost Drive are a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. The first block is surrounded on three sides by commercial properties.

On the west side of this block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is at 7047 Franklin Avenue. The Hotel also has a back driveway off of Outpost Circle, which directly impacts our corner and residence at Outpost Drive and Hillside Avenue adjacent to Outpost Circle.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first blocks of Outpost Drive.

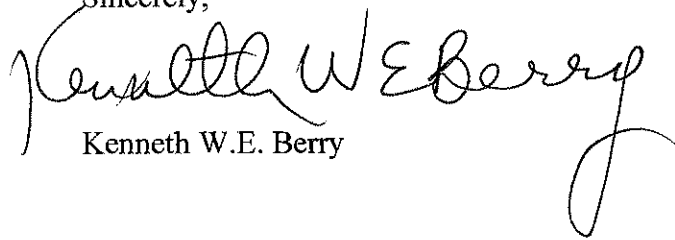
Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low-density hillside residential neighborhood from the potential

41-1

negative impacts to the commercial properties that surround the neighborhood on three sides.

41-1

Sincerely,

A handwritten signature in cursive script that reads "Kenneth W.E. Berry". The signature is written in black ink and is positioned above the printed name.

Kenneth W.E. Berry

(1 outpost DEIR letter)

**Robert Blue**

1001 N. Wilton Pl  
Hollywood, CA 90038  
Email: bob.b.blue@gmail.com

June 1, 2011

Srimal Hewawitharana, Environmental Review  
Los Angeles City Planning Department  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Sent Via Email : [SRIMAL.HEWAWITHARANA@LACITY.ORG](mailto:SRIMAL.HEWAWITHARANA@LACITY.ORG)

RE: Comments on the Draft Environmental Impact Report for the Hollywood Community Plan Update  
Case No. ENV-2005-2158-EIR

## **I. INTRODUCTION**

The inaccuracy of the Environmental Report for Case No. ENV-2005-2158-EIR, its assumptions, and projections of growth will have a significant impact on the quality of life for the residents, the local economy, and the infrastructure both within the boundaries of the Hollywood and City-wide.

The projections of population growth are far greater than the actual count based on the 2010 Census for the Plan area. Furthermore the actual census count for 2000 and 2010 shows a declining population trend. Based on the actual population and the vacancy count, the need for additional housing has already been met and it is not necessary to increase density within the Plan area.

By using the wrong data, the DEIR allows for excessive growth which will significantly impact the aging infrastructure and put a further burden on Los Angeles' limited water supply (impacting all of Los Angeles). Furthermore, the changes made to zoning ("up-zoning") and increased density threatens the preservation of residential neighborhoods, historic resources, traffic, and the local economy. These impacts affect the quality of life of the residents.

## **II. ACTUAL POPULATION VERSUS PROJECTED POPULATION IN DEIR**

### **A. DEIR Overstates Population**

The actual Census population count and number of vacant units has been submitted by others and is available at the following links:

A look-up map that pulls data from the Official US Census website can be found at:  
<http://projects.nytimes.com/census/2010/map>

A look-up by Zip Code and then by Census tract can be found at this site which will show a net decrease in population and a net increase in vacant housing units.

42-2

The projections cited in the DEIR are over the actual Census population count. For example the DEIR cites a population estimate for 2005 of 224,426 for the area. The actual US Census 2010 population count for the area is 199,249.

### **B. Housing Needs Are Met Without the Need to Increase Density or “Up-Zone”**

Based on actual US Census population counts and number of housing units for the Plan area, the housing requirements have already been met. Therefore the justification for increasing density is no longer needed. The EIR needs to reflect that fact by including the actual population and housing unit counts.

42-3

Since increasing density has many significant negative Environmental impacts and since the need for increased density is not shown with the actual Census data, the Hollywood Community Plan should instead reflect a sustainable Environmental goal by not increasing density and in some cases reducing density through reduced Floor Area Ratios (FAR) and reduced height allowances.

## **III. WATER SUPPLY**

The DEIR proposes to increase density which will mean a net increase in the number of water fixture units within the Plan area which will result in dramatically increased water usage. Los Angeles faces long-term drought conditions and diminishing water supplies and through its water utility is taking measures to reduce consumption (demand) of water. But those steps are counteracted by this plan. This affects all Los Angeles residents.

42-4

According to James B. McDaniel, Senior Assistant General Manager [Head of the Water System] of the Los Angeles Department of Water and Power (LADWP), Los Angeles will continue to face limited water supply. In his article published in the Los Angeles Daily News dated April 10, 2011 titled “Drought is over but water still precious” Mr. McDaniel states “Because the reality is we live in a semi-arid climate, prone to drought, with a limited native water supply that was used up years ago (the Los Angeles River) or has become largely contaminated (the San Fernando basin groundwater).”

### **A. Global Climate Change’s Affect on Water Supply in Los Angeles**

Mr. McDaniel also points out that “The reality is that climate change is creating new uncertainties for the traditional water supply.”

## **B. The Available Existing Water Supply Sources are Diminished**

Additionally, Mr. Mc Daniel stated:

“The reality is that years of little snow and rainfall, pumping restrictions and other legal or environmental obligations have vastly reduced the amount of water that we can import from these traditional sources [Eastern Sierra and Owens Valley, the Sacramento-San Joaquin Delta, and the Colorado River]

“... Today, almost 40 percent of the water historically diverted to Los Angeles now stays where it belongs in the Eastern Sierra watershed - restoring the Lower Owens River, replenishing Mono Lake, calming dust storms at Owens Dry Lake, and improving vital habitat.

“Over the past few years, the combination of these environmental commitments and years of below-normal snowfall in the Sierra have triggered a citywide call for water conservation. Los Angeles is not alone in this. Drought conditions and pumping restrictions due to environmental concerns have reduced water deliveries to much of the Southern California region and elsewhere in the state, while the population continues to grow. Even as normal rain and snowfall return this year, these regions can expect to see water shortages.”

Given these facts, the DEIR should not increase density because of the severe impact on water supply this would have on all residents of Los Angeles and its ability to attract new businesses and jobs. This is not sustainable.

42-5

## **C. Deferred Analysis Using Flawed Data**

The DEIR does not adequately analyze the impact on the infrastructure including the Water Supply. Deferred analysis and mitigation is a clear violation of the California Environmental Quality Act (“CEQA”).

The very purpose of an EIR is to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “*identify ways that environmental damage can be avoided or significantly reduced.*” (Cal. Code of Regulations, Title 14, §15002(a)(2). Per the Courts, the EIR’s “*purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’*” Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.

42-6

“*The absence of information from the environmental impact report is a prejudicial abuse of discretion if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.*” Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners (App. 1 Dist. 2001).

#### **IV. AGING INFRASTRUCTURE**

Allowing increased density in the Hollywood Community Plan DEIR will have a detrimental and negative impact on the aging infrastructure. Instead of “putting the cart before the horse,” the plan needs to adequately address infrastructure issues by specifically planning for its modernization and upgrades just to handle the current population and the growth already allowed with vacant housing units.

Adding additional density, especially when it is unwarranted, only overtaxes the capacity of the infrastructure – Neglected streets are unable to handle additional traffic flow including additional buses, the sewer system will not be able to adequately handle additional flow, the Water and Power distribution systems will see additional and more frequent outages and failures.

##### **A. Water and Power Infrastructure**

According to a March 25, 2008 press release, the General Manager of the Los Angeles Department of Water and Power said: “First, it is indisputable that our infrastructure is deteriorating and must be renovated.” He went on to say “Our infrastructure has served us well, but is now creaking like a tired workhorse under the weight of generations of heavy use. Much of our system of power poles and transformers, power lines and water mains is between 40 and 70 years old. It has been maintained and repaired, but now needs a major overhaul to meet the needs of the City and its residents. This fact is well documented by study after study that our assets are old and our outages are becoming more frequent.”

On June 10, 2010, the former DWP General Manager and Deputy Mayor Austin Beutner stated “...years of deferring maintenance on the DWP's infrastructure has created a backlog of hundreds of millions of dollars worth in upgrades that need to be made to outdated power facilities and aging water pipes.

"This is a great place (but one) where we have deferred costs for years," Beutner said. "It would be real easy for me to say, 'let it slide.' But, we are getting to a point where we can no longer afford to do that."

##### **B. Streets, Trees, Sidewalks and Parks**

The City of Los Angeles including the DEIR Plan area faces a backlog of up to 80 years in the City's schedule to repair sidewalks, streets, and trim trees located on sidewalks. This issue is not adequately addressed in the DEIR. Furthermore, the Plan area is drastically underserved in its open and park spaces based on population-based City-wide standards. The DEIR does not adequately address and prioritize these community assets.



## **V. HISTORIC RESOURCES**

The DEIR Plan area includes many historic resources including those on the National Registry of historic places such as the Hollywood Boulevard Commercial and Entertainment District. Many of these historic resources are threatened by demolition for newer development. The unnecessary increased zoning/density proposed under the DEIR further threatens the future of these historic resources by increasing the value of the land for new development and by overwhelming existing historic structures with over-height and largely massed buildings.

42-9

The preservation and protection of historic resources should be of the highest priority in the Plan's DEIR.

### **A. Preservation is Environmentally Preferred**

Tearing down an older homes or buildings for the purposes of constructing a new structure has a larger impact on global warming and the environment.

An older home or building represents a substantial investment in energy. It took energy to mill the timber, energy to manufacture the bricks or cinderblocks, energy to create glass for the windows, energy to produce the pipes. It also took energy to transport those materials to a construction site. And it took still more energy to assemble the materials into a building.

Keeping existing buildings intact, updating and improving as needed, saves energy and conserves natural resources. Preventing demolition and promoting preservation reduces the waste stream sent to landfills.

42-10

## **VI. PROTECTION OF SCENIC VISTAS**

The Hollywood Hills, the Hollywood Sign, and the Griffith Park Observatory are some of the most recognizable landmarks in the World. People travel from around the world to see these. The attraction of these landmarks adds to the local, City, and regional tourism economy.

The protection of scenic views should be a critical part of. The DEIR does not adequately address these issues. Building height restrictions should be part of the Plan to protect scenic views. Instead the Plan allows tall buildings that will block scenic views and shadow pedestrian walk ways and small historical buildings.

42-11

## **VII. DEIR DOES NOT ADQUEATLY ANALYSIS ALTERNATIVES**

According to the California Supreme Court, an EIR is required to “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.” Wildlife Alive v. Chickering (1976) 18 Cal.3d 190, 197. This discussion of alternatives must be “meaningful” and must “contain analysis sufficient to allow informed decision making.” Laurel Heights Improvement Assn. of San Francisco, Inc., v. Regents of University of California 47 Cal.3d at 403-404.

42-12

An “agency preparing the EIR may not simply accept the project proponent’s assertions about an alternative; rather, the agency ‘must independently participate, review, analyze and discuss the alternatives in good faith.’” Save Round Valley 157 Cal.App.4<sup>th</sup> at 1460. The “applicant’s feeling about an alternative cannot substitute for the required facts and independent reasoning.” Id at 1458.

“In finding the alternatives analysis flawed, the court [in San Joaquin Raptor (1994) 27 Cal.App.4<sup>th</sup> 713, 738] pointed out the EIR’s ‘discussion of alternatives does not foster ‘informed decision making’ because it is ‘devoid of substantive factual information from which one could reach an intelligent decision as to the environmental consequences and relative merits of the available alternatives to the proposed project...’ Here, as there, ‘[b]ecause the discussion of alternatives omitted relevant, crucial information, it subverted the purposes of CEQA and is legally inadequate.’” Friends of the Eel River v. Sonoma County Water Agency (2003) 108 Cal.App.4<sup>th</sup> 859, 873.

“[T]he FEIR was required to identify a reasonable range of environmentally superior alternatives and to set forth facts and ‘meaningful analysis’ of these alternatives rather than just the agency’s bare conclusions or opinions.” Preservation Action Council v. City of San Jose, (2006), 141 Cal.App.4<sup>th</sup> at 1353.

“[T]he Legislature has also declared it to be the policy of the state ‘that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects...’ (§ 21002.) ‘Our Supreme Court has described the alternatives and mitigation sections as “the core” of an EIR.’ (Los Angeles Unified School Dist. V. City of Los Angeles (1997) 58 Cal.App.4<sup>th</sup> 1019, 1029.)” Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4<sup>th</sup> 587, 597.

According to the California Supreme Court, an EIR is required to “ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.” Wildlife Alive v. Chickering (1976) 18 Cal.3d 190, 197. This discussion of alternatives must be “meaningful” and must “contain analysis sufficient to allow informed decision making.” Laurel Heights Improvement Assn. of San Francisco, Inc., v. Regents of University of California 47 Cal.3d at 403-404.

**VIII. CONCLUSION**

The Plan's DEIR is not accurate because it makes false assumptions about the existing and projected population and vacant housing units. These assumptions are part of the basis for increasing density which significantly negatively impacts the Plan area, including but not limited to the Infrastructure, the City's Water supply, historic resources, the integrity of residential neighborhoods, traffic, and scenic views.

42-13

Sincerely,

*Robert Blue*

Robert Blue

See FEIR Appendix for attachments to this letter.



Letter 43

Kevin Keller <kevin.keller@lacity.org>

# Fwd: Hollywood CP Case No. EIR-2005-5158-EIR State Clearinghouse Number: 2002041009

1 message

**Srimal Hewawitharana <srimal.hewawitharana@lacity.org>** **Wed, Jun 1, 2011 at 3:36 PM**  
To: Mary Richardson <mary.richardson@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Wendy Lockwood <wl@siriusenvironmental.com>

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

From: <[LANNYB1@aol.com](mailto:LANNYB1@aol.com)>  
Date: Wed, Jun 1, 2011 at 2:38 PM  
Subject: Hollywood CP Case No. EIR-2005-5158-EIR State Clearinghouse Number: 2002041009  
To: [Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

From: Elaine Brown  
11445 Skyland Rd  
Sunland, CA 91040  
818 353-9331  
Member of Sunland Tujunga NC LUC  
President of Commerce Owners and Business Association, Inc

RE: Comments on FEIR for Hollywood Community Plan Update

Dear DEIR Administrator Hewawitharana,

The Hollywood Community Plan Update will be the first to be completed. It will set a precedent for the remaining 34 Community Plans. 43-1

The Update includes densification through upzoning of the General Plan Framework based on what community input?

The densification is based on projected population increases which are not justified.

The Update is using figures from the 2000 census rather than 2010. The population decreased during the last decade and the projections for future population should be balanced. 43-2

There are no infrastructure provisions for monitoring the capacity for what exists or plans to improve infrastructure for an increased population.

SHELL & CRAIG CARDON  
1958 OUTPOST CIRCLE  
LA, CA 90068

May 27, 2011

RECEIVED  
CITY OF LOS ANGELES

JUN 09 2011

ENVIRONMENTAL

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

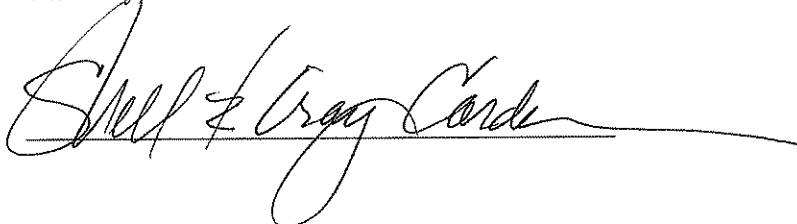
On the west side of the first block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost Circle, which is inside a hillside residential neighborhood.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,





## Comments to Draft EIR Hollywood Community Plan Update due 6.1.2011

3 messages

Joyce Dillard <dillardjoyce@yahoo.com>

Wed, Jun 1, 2011 at 4:41 PM

To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>, The Honorable Carmen Trutanich <CTrutanich@lacity.org>

Comments to Draft EIR Hollywood Community Plan Update due 6.1.2011

You state:

**“The recommended pattern of land use directs future growth to areas of Hollywood where growth can be supported by transportation infrastructure. The changes in land use designations and zones presented in the Proposed Plan are intended to accommodate growth anticipated in the 2030 SCAG Forecast and allow for additional development. Hollywood is a prime location for transit-oriented development. The investment in transit infrastructure in Hollywood provides an opportunity for integrating transportation planning with land use planning. Mixed use development around Metro stations and transit corridors would provide residents with mobility choices that would enable them to reduce the number and length of vehicle trips thus reducing greenhouse gas emissions.”**

Transportation infrastructure seems to be limited to transit with no consideration for vehicles including goods movement.

You are talking about a Regional Sustainable Communities Strategy which SCAG has in draft for the 2012 Regional Transportation Plan and is part of SB 375. SCAG has adopted Framework and Guidelines for Subregional Sustainable Communities Strategy.

45-1

You present no such guidance.

According to a presentation at SCAG’s Annual Demographic Workshop, the anticipated 2035 SCAG region projection by age is:

0-20 Years 29%  
21-64 Years 55%  
65+ Years 17%

Los Angeles County has about a 55% market share. You have not done due diligence to show that the Hollywood community fits into this average criteria and application.

45-2

The Planning Demographic Census Tract data for Council Districts 4 and 13 show substantial vacancies.

45-3

LAUSD for Local District 4, which encompasses Hollywood, shows a decline of 16.4% enrolled students from 2005-2006 which would effect SCAG's regional average.

45-3  
cont.

Charter Schools are not incorporated into the General Plan as is Workforce Housing.

45-4

Southern California Compass, as described by SCAG:

**“In an effort to provide local decision-makers with the tools they need to plan more effectively for the six million new residents projected to live in Southern California by 2030, SCAG undertook an unprecedented growth visioning initiative called Southern California Compass. The initial objective was to develop a comprehensive new vision for Southern California over the next 30 years by taking a more all-encompassing, inclusive approach to planning at both the local and regional levels. The vision, called ‘The 2% Strategy,’ offered mixed-use and infill development strategies for long-term growth that would only incorporate an additional 2% of the region’s available space. Upon the receipt of a \$1.2 million statewide planning grant, SCAG has entered the Compass Blueprint phase, now offering cities, counties and subregions a suite of services to plan for growth using Compass principles. The new growth vision resulting from Southern California Compass is unprecedented in both approach and scope, and it continues to provide a framework to guide all of SCAG’s land use, transportation, housing and other regional planning initiatives.”**

SCAG’s Growth Vision Report June 2004 refers to Transportation Analysis Zones TAZ, scenarios for determination and a Total Jobs-Housing Balance. We see no such projections for this Community Plan and no application for the expected age groups and their needs including the growth of families.

45-5

The 2007 SCAG Member Handbook, pdf. page 9 states:

**“One thing is certain – our population will continue to grow. Millions of new residents will call Southern California home by 2030, with the majority of that growth resulting from births within the region. This tremendous growth will have impacts that transcend city and county borders, and we must work together regionally to address challenges associated with growth. Decisions made by individual communities have increasingly important implications on other communities and the region as a whole.”**

On pdf. page 11, the Regional Transportation Plan RTP is addressed:

45-6

**“The RTP provides a projection of the overall growth and economic trends in the SCAG region to the year 2030 and also provides strategic direction for transportation investments during this time period. The RTP is critical in that major transportation projects within the region seeking either federal or state funding must be consistent with provisions in the plan. The RTP serves as a catalyst for linking various transportation agency investments within the SCAG region in order to provide a**

**cohesive, balanced and multi-modal transportation system that addresses regional goals and is consistent with federal and state requirements. SCAG is responsible for reviewing all Congestion Management Plans for consistency with regional transportation plans.”**

Transportation investments, their funding and their ownership (ie Public-Private Partnerships P3) should be addressed to see the viability of the planning. Without investment or debt, the timely completion of transportation investments is unlikely.

45-6  
cont.

If P3s are used, is their affordability in the fees charged to make use of the new linkages.

Non-disclosure places the citizens and taxpayers at risk of losing valuable services to debt financing and repayment and changes the intent of the Community Plan.

AB 32 planning is being addressed by the Los Angeles Regional Collaborative LARC. It is a chartered organization with participation by the City, CF 08-3388.

The Deputy Attorney General participating in this group plans to tie in Climate Change Action Plans into the General Plan.

45-7

The objections are:

- **“Build a Regional Climate Action Plan to**
- **1) establish baselines of current greenhouse gas emission levels,**
- **2) identify greenhouse gas emission reduction targets and mandates,**
- **3) develop a mechanism for tracking progress in reducing those emissions,**
- **4) identify a full range of measures for reducing greenhouse gas emissions and adapting to climate change, and**
- **5) provide strategies to help meet those goals.**
- **Proactively create cross-jurisdictional and public-private partnerships in support of the regional action plan development and implementation.**
- **Work together to leverage local, state and federal resources to implement the Regional Climate Action Plan.**
- **Share information and best practices on climate change and other sustainability goals.**
- **Develop a consistent communication plan for informing stakeholders of the Los Angeles region of the urgency in addressing global climate change and reducing greenhouse gas emissions.”**

You have a ClimateLA, an action strategy plan, issued by the Mayor not yet adopted.

You state:

**“1996 General Plan Framework Element as well as more recent planning theory associated with smart growth, transit oriented development and the planning and land use response to reduction of greenhouse gas emissions, including Senate Bill (SB)**



375 (legislation requiring local communities to reduce greenhouse gas emissions through integrated land use and transportation planning that reduces vehicle miles travelled). The intent of the CPU program, including the Hollywood CPU, is to evaluate existing land use policies and programs and to revise them as appropriate to guide future development consistent with current planning practice (especially in light of recent global warming legislation including AB 32 and SB 375) through an appropriate horizon year.”

45-7  
cont.

The 1996 General Plan Framework does not include changes such as Ordinance 179681 Affordable Housing Incentives and its impacts, monitoring and mitigation.

Regional entities are not part of the 1996 General Plan, yet their cooperation is necessary to execute the regional demands of state legislation.

The Hollywood Basin is not adjudicated leaving groundwater rights to the individual property owners. This is an important factor in the planning of recycled water because groundwater cannot be extracted by the LADWP unless it is on their own property. No spreading grounds are in the Hollywood Community Plan. Spreading grounds are a source of groundwater recharge.

Purple pipe infrastructure should be addressed.

Stormwater permits MS4 and NPDES discharges, are under the jurisdiction of the Regional Water Quality Board and are permitted to the County of Los Angeles.

45-9

Watershed planning and Total Daily Maximum Load TMDL pollutants should be addressed with scientific measurement, monitoring and mitigation and source detection.

The participation of the City of Los Angeles in the Greater Los Angeles Integrated Regional Water Management Plan IRWMP should be addressed as this entity was not in effect in the 1996 General Plan Framework Element.

Green Acres and Kern County for biosolids is in litigation with no alternative replacement.

Electricity needs should be assessed on current levels of supply, future renewable supply and transmission needs. Any financial interests in transmission lines, such as the Desert Southwest line should be disclosed.

45-9

Participation in the California Transmission Planning Group CTPG, the Southern California Public Power Authority SCPA and the Bonneville Power Administration should be incorporated into this document to address the utility needs, monitoring and mitigation.

Recycling centers, its impacts, monitoring and mitigation should be addressed.

45-10

Low Impact Development, its impacts, discretionary approvals, monitoring and mitigation should be addressed,

45-11

Oil, methane and other gas migrations should be addressed for monitoring and mitigation.

45-12

Jurisdictional issues and regional planning issues with the Santa Monica Mountains Conservancy should be addressed.

Development with the approval of the Department of Transportation, Department of Housing and Urban Development and/or the Department of Labor should be addressed.

Dependence on federal transportation funding should be addressed.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

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**Srimal Hewawitharana** <[srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)>  
To: Joyce Dillard <[dillardjoyce@yahoo.com](mailto:dillardjoyce@yahoo.com)>

Thu, Jun 2, 2011 at 8:42 AM

Dear Ms. Dillard,

Thank you for your comments on the Hollywood Community Plan Draft EIR. We will be responding to all comments received during the review period, in the Final EIR.

Sincerely,

Srimal P. Hewawitharana  
Environmental Specialist II

[Quoted text hidden]

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**Srimal Hewawitharana** <[srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)>  
To: Mary Richardson <[mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)>, Kevin Keller <[kevin.keller@lacity.org](mailto:kevin.keller@lacity.org)>, Wendy Lockwood <[wlockwood@siriusenvironmental.com](mailto:wlockwood@siriusenvironmental.com)>

Thu, Jun 2, 2011 at 8:43 AM

[Quoted text hidden]

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Letter 46

Kevin Keller &lt;kevin.keller@lacity.org&gt;

## Fwd: Comment on Hollywood DEIR

1 message

Srimal Hewawitharana &lt;srimal.hewawitharana@lacity.org&gt;

Tue, May 31, 2011 at 2:56 PM

To: Mary Richardson <mary.richardson@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Wendy Lockwood <wl@siriusenvironmental.com>

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

From: **Brian Dyer** <bwdyer@hotmail.com>  
 Date: Tue, May 31, 2011 at 2:05 PM  
 Subject: Comment on Hollywood DEIR  
 To: [Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)  
 Cc: Robin Moreno <[robinm@projectsavinggrace.net](mailto:robinm@projectsavinggrace.net)>

Dear M. [Hewawitharana@lacity.org](mailto:Hewawitharana@lacity.org)

After perusing the Draft Environmental Impact Report, I have several comments.

1. The State Enterprise Zone extends up to Franklin Avenue between Highland and Cahuenga. This would enable this area to have a lower parking ratio. However, the area immediately south of Yucca is considered commercial and extends past Sunset. The area North of Franklin is restricted parking which the residents south of Franklin can not access. The combination of the SEZ borders with the Permit Parking districts surrounding the area has flipped parking/street resources to such a degree that it hugely impacts the area life of the residents. The older, taller building, more highly dense buildings in the corridor were built in an era for which parking wasn't planned. The lessening of the ration, due to this border, will reduce the parking resources to an unlivable amount. The red-line, no matter how well intentioned, does not serve everyone in the area. 46-1
2. The City has allowed variances on height restrictions on most new buildings in this area. Even though there is a plan in place, and no change imminent for the area, the City frequently doesn't follow this.
3. There is minimal road infrastructure between bordered by Franklin, Hollywood Blvd, Cahuenga and Highland. Franklin is only two lanes between Cahuenga and Highland, creating traffic back-ups. Due the frequency of street closures for the Chinese and Kodak theatres, people drive through the residential neighborhood above the speed limit all the time. Drivers will not reduce to residential speeds even when pedestrians are in the sidewalk, and there is nothing in the plan (speed humps, stop signs or lights) to mitigate the change in people's behavior due to the changes that high density will make. Also, for any corrections to the problems to occur, funding sources would need to be found. As other areas of the City are still waiting for funding, how will the city be able to make the streets safe for the residents? Increasing density in the area will be like "pouring 10 pounds of mud into a 5 pound bag." It's bound to come apart at the seams, and the seams are the residential streets. 46-2
4. During public, city sponsored events (Academy Awards, Christmas Parade, Movie premieres) the street parking is removed, making it that much more difficult on residents.

5/31/2011

City of Los Angeles Mail - Fwd: Comme...

For these reasons above, I believe the city is misguided in lowering the variances in the neighborhood. Also to consider if the city revenues will be enough.

46-2  
cont.

5. Due to the variance in city dollars and to cutbacks seen in the last 20 years that the previous City Plan was in effect, can the city guarantee the need for traffic directors and maintenance of the infrastructure to serve the area? During Bowl and special events, the Freeway 101 exit on Cahuenga is manned and sometimes, the Highland Franklin intersection is. During other times, the backup that drivers create by trying to get through the intersection before the light turns red backs up Franklin into La Brea, into Fountain. It also creates Havoc on Hollywood Boulevard West of La Brea. This is not only in commute times. Since Hollywood is central to most of Los Angeles, it creates a tremendous percentage of commute time for all workers within a five mile radius of the Cahuenga Pass.

I am also concerned how high density creates vulnerabilities in Hollywood to natural disasters. Considering that the Hollywood Red Line had difficulty foreseeing an underground river, and the San Andreas fault created the Cahuenga Pass and toppled many buildings in the 90s. With the Hollywood Bowl, Kodak Theatre, Pantages and John Anson Ford theatre all within one freeway exit after coming through the pass, business traffic trying to get on the freeway to access the valley or downtown and the continual onslaught into the area for the 'club scene', the street infrastructure is insufficient to provide emergency access if higher and higher density levels continue. New high density buildings on Vine and Argyle are planned, along Highland they are already built.

46-3

Respectfully,

Brian Dyer



Letter 47

Kevin Keller &lt;kevin.keller@lacity.org&gt;

## Fwd: Comments on Draft EIR - Hollywood Community Plan

1 message

**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>

Tue, May 31, 2011 at 10:25 AM

To: Mary Richardson &lt;mary.richardson@lacity.org&gt;, Wendy Lockwood &lt;wl@siriusenvironmental.com&gt;, Kevin Keller &lt;kevin.keller@lacity.org&gt;

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

From: **Robert Eicholz** <[beicholz@pacbell.net](mailto:beicholz@pacbell.net)>

Date: Tue, May 31, 2011 at 7:56 AM

Subject: Comments on Draft EIR - Hollywood Community Plan

To: [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)Cc: "Steven J. Scott" <[ssdi@me.com](mailto:ssdi@me.com)>

May 27, 2011

Mr. Srimal Hewawitharana  
 Environmental Review Coordinator  
 Los Angeles Department of City Planning  
 200 North Spring Street, Room 750  
 Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawithama;

I am a resident on just off of Outpost lower Outpost Drive. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

The proposed expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

As background, on the west side of the first block of Outpost Drive is a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive. On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost

Circle, which is inside a hillside residential neighborhood.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low-density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

47-1  
cont.

Sincerely,

Robert L. Eicholz  
1966 Outpost Circle  
Los Angeles, CA 90068

---

2733 Woodstock Road  
Los Angeles, CA 90046-1118

June 1, 2011

Via USPS and email

Ms Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on the Hollywood Community Plan Update DEIR  
Case No. EIR-2005-5158-EIR  
State Clearinghouse Number 2002041009

Dear Ms Hewawitharana:

Thank you for the opportunity to provide written comments to the Planning Department of the City of Los Angeles with regard to the Hollywood Community Plan Update Draft Environmental Impact report (DEIR).

I am writing to you as an individual even though I am the vice president of the Hollywood Hills West Neighborhood Council (HHWNC), which is one of Los Angeles' certified neighborhood councils. HHWNC has written a separate letter to you regarding the DEIR. I support the recommendations stated in that letter, including the recommendation that a nexus study needs to be done, and that mandatory mitigations and improvements are needed before we can support the DEIR. This letter is to provide supplementary comments and suggested corrections on the DEIR.

I also am one of City Council Member Tom LaBonge's appointees on the Citizens Oversight Committee for District One of the Santa Monica Mountains Conservancy's (SMCC) use of the open space bond funds. Again, I am writing this letter as an individual, rather than on behalf of the SMCC or the committee.

The footprint of the HHWNC includes an extensive part of the Hollywood Community Plan Area (CPA). HHWNC's area is bounded by Laurel Canyon on the west, Mulholland Drive, the Cahuenga Pass and the Los Angeles River on the north, Mt. Tom, part of Lake Hollywood and Cahuenga on the east, and Hollywood Blvd, LaBrea and Fountain on the south. Similarly, the SMCC Citizens Oversight Committee for District One covers the hillside areas from the 405 to Griffith Park. Involvement with both

48-1

organizations provides substantial knowledge of the potential impacts of the Proposed Community Plan Update.

48-1  
cont.

The Hollywood Community Plan Update (CPU) has been a long term project for the City of Los Angeles' Planning Department. It has taken at least 17 years for the Planning Department to release the Hollywood CPU for public comments, such as this letter. It is sad that, after so much time, the DEIR doesn't seem to provide a sufficient analysis of the significant impacts which the CPU would have on Hollywood in order to satisfy CEQA.

This is particularly suprising since Mayor Antonio Villaraigosa has stated in public interviews, including with the Los Angeles Times, that the Hollywood CPU, as well as the redevelopment of NBC-Universal's MTA station area on Lankershim and the studio's back lot, which are approximately 400 acres, were among his top priorities. The NBC-Universal back lot is also (i) in HHWNC's area and (ii) adjacent to the Hollywood CPA.

It is very important for HHWNC's stakeholders that both the Hollywood CPU and redeveloping NBC-Universal's back lot be done well, accurately and in accordance with applicable laws, such as the California Environmental Quality Act (CEQA).

Ironically, the Hollywood CPU's DEIR seems to start falling short of those goals on its cover page. The cover page states that the DEIR's project location is Hollywood. Hollywood is defined, in part, as being "east of Mulholland Drive". With all due respect, most people think that Mulholland Drive is more of an east-west route, rather than a north-south route. The same seemingly erroneous statement also is made in the project location description section at DEIR, Section 2.0. These statements should be corrected to describe Hollywood accurately.

48-2

The Hollywood CPU DEIR's cover page continues with "a project description". The project is described as the Proposed Hollywood Community Plan, and states that it consists of changes in land use designations and zones which are intended to accommodate growth anticipated in the SCAG 2030 Forecast and allow for additional development. There is no real statement explaining why additional development is needed or appropriate. Towards the end of the DEIR, in Section 6.2, there is a statement that the Planning Department considers the DEIR's proposed land use capacity changes and adjustments to accommodate anticipated growth to not be growth inducing, but growth accommodating. This seems to be the only rationale for the proposed land use changes.

48-3

The unfortunate truth, however, is that several of the proposed land use changes in HHWNC's area, as well as other parts of the Hollywood CPA, are growth inducing, rather than growth accommodating.

For example, the increased density being proposed for the Barham corridor running from Cahuenga West to Forest Lawn Drive is growth inducing, rather than growth accommodating.



Similarly, the increased density being proposed by downsizing the required minimum residential unit size for the Franklin corridor running generally from LaBrea through and beyond the 101 to the east is going to induce growth, rather than accommodate growth. Increasing zoning to allow more small residential units means more growth and more density. The impact of inducing that growth is either minimized or ignored in the DEIR.

48-3  
cont.

Substantial portions of these two corridors already are too densely populated and suffer from traffic gridlock, insufficient parking, and insufficient infrastructure. Instead of increasing the density in these corridors, the zoning and density in these corridors should be kept at their current levels unless and until traffic improvements/mitigations are required and implemented, including additional parking for residents and visitors.

Barham/Cahuenga, the 101 and Highland, Franklin/Hollywood/Sunset and Fountain often can be simultaneously gridlocked by an accident or special event. These streets form an almost inverted “T” shaped traffic corridor through the Cahuenga Pass area and downtown Hollywood. Their traffic problems are interrelated. In order to support additional density and development in these areas, there needs to be mandated improvements today. Statements suggesting that we share or have aspirations for improving traffic and mobility by 2030 are little more “wishful thinking”. Several years ago, our HHWNC board members took our City Planners for an afternoon rush hour tour to demonstrate the problem(s); it’s sad to see that their tour isn’t reflected in proposals for improving traffic flow, parking spaces, parking facilities etc. The Hollywood Mobility Plan is more aspirational than anything else. It doesn’t provide or require the significant improvements which are needed.

48-4

From a real estate development perspective, specifically, in the Barham corridor, the lots fronting on Barham Blvd generally aren’t suitable to land use designation increases. The lots aren’t suitable to massive redevelopment. Because the lots are not large/deep enough.. To upgrade the zoning there to provide higher buildings and more commercial enterprises is impractical. The traffic and parking for such buildings would tie up the already all too congested Cahuenga/Barham/Pass Avenue corridor even more often and for longer periods of time.

48-5

A third example of growth inducing development is provided by the NBC Universal’s proposals for redeveloping the MTA station area at Lankershim and the studio’s back lot.

The MTA station at Lankershim is a public asset adjacent to the Hollywood CPA. The MTA and NBC-Universal have proposed building two office towers of approximately 30 stories each there along with an additional parking structure(s). The MTA station would remain a public asset, but it largely would serve the needs of NBC-Universal. Currently, it serves the entertainment company’s needs as well as the needs of the Hollywood, Studio City and North Hollywood communities. Essentially, a public asset, the MTA station, would be redeveloped to serve largely one private corporation’s interests. This could be viewed, realistically, as privatizing the MTA station.

48-6

And, if the Evolution Plan were adopted to redevelop the almost 400 acres of the NBC-Universal back lot, which is adjacent to the Hollywood CPA, approximately 2400 additional housing units would be developed on a new road which would be parallel to, and west of, Barham. The new 2400 housing units would put significant additional traffic pressure on the Barham corridor. Even if the proposed traffic mitigations under the Evolution Plan project were implemented, and there currently is no requirement to do so, the Hollywood CPU's proposals to up-zone the sites of the current local flower shop at Barham/Cahuenga, the strip mall at Lake Hollywood Drive, and the tennis club at Forrest Lawn will only induce additional growth and congestion, rather than accommodate growth. There is no reasonable rationale for supporting these proposed land use changes. The 2400 additional housing units also would be in the area of the NBC-Universal back lot which is the furthest away from the MTA station, which flies in the face of the frequent statements in the DEIR that new housing should be located near public transportation stations and routes.

48-7

Similarly, there is no reasonable rationale for the DEIR's frequent statements that height districts in Hollywood's commercial areas should be made consistent with the height limitations in other community plans, or to remove the development limitations that were imposed by the 1988 update. Is consistency for its own sake a reasonable or rational basis for changing the permissible heights of buildings in Hollywood's commercial sections? Any environmental impact statement should provide a clear explanation for any such proposed change; this DEIR does not do so. The DEIR should be revised to provide additional analysis and a new round of public comments should be provided if the Planning Department wants to continue proposing the elimination of the current height restrictions in Hollywood.

48-8

For another example, see Section 4.1 at page 4.1-5, where there is a statement that removing the height limitations is intended to make Hollywood's height limitations in commercial areas consistent with the limits in other parts of the City of Los Angeles. Sadly, again, no reason for making this proposed change is stated. Merely repeating that changes should be made for consistency doesn't make any proposed change any more convincing, accurate, or true.

Our County Supervisor, Zev Yaroslavsky, has spoken often about the value of retaining the 1988 height limitations which he and former City Council Joel Wachs worked hard to enact when they were on the Los Angeles City Council. However, the Hollywood CPU DEIR is completely silent as to the rationale for the Planning Department's administrative recommendation to remove those limitations now. Why? How can the DEIR's silence possibly satisfy CEQA's requirements?

The rationale for imposing those height limitations in Hollywood and elsewhere in 1988 was to limit building heights, maintain views, provide more sunshine, reduce shadows etc. Do those reasons any less legitimacy in 2011? This proposed change seems to be just "gift-giving" to developers.

Again, the point is that the DEIR does not adequately discuss the rationale for eliminating the 1988 heights limitations, or the impacts which eliminating the 1988 height limitations would trigger. For example, in the Vine/Franklin area, eliminating the 1988 height limitations would remove the view sheds of downtown currently available in large parts of Hollywood Heights and Whitley Heights. The DEIR doesn't mention or analyze these impacts.

48-8  
cont.

While I've drawn your attention to the DEIR's Summary section, please note that there is an open question as to whether the 2010 US Census results are similar to the SKAG 2030 forecast. If those results are inconsistent, shouldn't the inconsistency be analyzed in the DEIR?

48-9

There are additional errors in the project location section at page 2-1. The reference to the Santa Monica Mountain Range should be to the Santa Monica Mountains Range. On page 2-2, the DEIR states that the Los Angeles Rivers define the northeastern edge of the Plan area; my understanding, however, is that there is only one Los Angeles River. Also, in the second paragraph of the "Existing Transportation System" description on the same page, the word "primarily" seems like it should be changed to "primary" when referring to compass points.

48-10

In Table 2-2 on page 2-13 of the DEIR, the description of Hollywood's parks doesn't mention the long distance from some parts of Hollywood to Griffith Park. It also doesn't mention Runyon Canyon Park, which is regional magnet, or even the City's Recreation and Parks Department. The table mentions that a possible mitigation measure is to develop joint-use agreements with the school district, but omits to mention that there already probably is one such agreement with the Helen Bernstein High School regarding the use of the school's track and field.

In the table's description of the water supply, it seems that no one has talked to the Department of Water and Power's water managers, who will tell you that many of Hollywood's old water pipes need to be replaced and will not be repairable. Increased conservation doesn't begin to describe the required mitigations or the significance of the problem(s) which already exist. In the last few years, over 5000 linear feet of water pipe in Nichols Canyon was replaced because it was not repairable. Could the water pipe in Nichols Canyon be the only such water pipe in Hollywood? Did anyone ask the DWP's managers? It seems unlikely that the Nichols Canyon water pipe is the only fresh water pipe in the Hollywood CPA which needed to be replaced. The DEIR should provide a real analysis of the impact of proposed land use changes on Hollywood's water infrastructure. Just making a statement that conservation will keep water usage within a reasonable limit doesn't seem to be a sufficient analysis for CEQA.

48-11

In the table's description of the electrical supply, there is no mention of the unusually old infrastructure in the Hollywood CPA or the numerous outages which occur each year. There is no mention of the numerous overhead electrical wires and their obsolescence.

With regard to the table's description of solid waste mitigation at page 2-18, the DEIR states that impacts would be less than significant in 2030 with the implementation of recommended mitigations. Does anyone believe that is possibly accurate without requiring mitigation measures, like replacing much of the almost century old sewer system? The discussion on solid waste generation and disposal in the DEIR's Section 4.4 doesn't discuss this issue forthrightly. Instead, the DEIR's text keeps stating that, if mitigation measures are adopted, the problem(s) will be less than significant. That isn't a reasonable or rational discussion of the possible environmental consequences of Hollywood's growing solid waste problem(s). It's almost tautological to write that "if we hope things turn out well, then we won't have a problem". Is that a satisfactory analysis and discussion for CEQA purposes? To me, it seems unlikely to meet CEQA's requirements. Again, the DEIR should be revised to provide a real analysis of the current facts and a real analysis of the impacts which proposed land use changes would have. This DEIR doesn't seem to provide this information and analysis. Therefore, it should be revised and circulated for additional public comment(s).

48-12

In Section 3.3 of the DEIR, we once again have the "east of Mulholland Drive" and "Santa Monica Mountain Range" errors, which should be fixed. Also, in Section 3.4, the first bullet point presumably meant to refer to "public rights of way", rather than a singular one.

48-13

Table 4.3-3 purports to be a list of City fire stations serving the Hollywood Community Plan area. If so, then why is LAFD's Fire House 97 not listed there? The firehouse is on the north side of Mulholland Drive and just east of Laurel Canyon Blvd. Fire House 97 has primary responsibility for fire fighting in the Mulholland corridor, the Woodrow Wilson area and other northern parts of the hillside communities on the south slopes of the Santa Monica Mountains Range. For example, Fire Fighter Glen Allen, who died while fighting a fire in Hollywood earlier this year when a roof collapsed on him, was a member of LAFD Fire House 97. The firehouse should be on your list in Table 4.3-3.

48-14

Similarly, in Table 4.3-8, the DEIR lists parks and recreational facilities in the Hollywood CPA. However, the list omits to mention any land held by the Santa Monica Mountains Conservancy, such as the approximately 40 acres on Briar Summit or the almost 14 acres on Oakshire. Shouldn't those holdings be listed? And, below the table, on page 4.3-19, there is a statement that there is no formal shared use agreement for recreational facilities with LAUSD. If the Helen Bernstein High School's agreement was formalized, this statement also should be corrected.

48-15

On the next page, CF5.53 refers to "open Space". Shouldn't both words be initial capitals?

With regard to these types of public facilities and others, like libraries, the DEIR mentions that there are inadequacies which don't meet either City or State requirements. Shouldn't required mitigation measures be made? Isn't it time to require improvements, rather than merely to aspire to obtain funding for improvements?

48-16

In the explanation below Table 4.4-8, the DEIR states that the existing DWP electrical distribution facilities in the community plan area are capable of meeting present demands. We know from experience that is not a true statement. Initially through the good auspices of Council District 4, HHWNC has worked for several years with the DWP to understand why our area's electrical system fails so often. It doesn't seem that the Planning Department has listened to HHWNC's discussions or had its own similar discussions with the DWP. So, what research did the Planning Department unearth to support the assertion that the electrical system is capable of meeting current power demands?

48-17

The DWP's aged infrastructure is a cause of numerous blackouts. So, how can a DEIR contain such a statement? What empirical information is there to support it? The electrical managers of DWP have told us that the Hollywood CPA's electrical infrastructure is some of the oldest in the City of Los Angeles. Upgrading the CPA's electrical infrastructure should be a required mitigation measure before any additional growth in HHWNC's portion of the CPA is authorized. Again, the DEIR doesn't seem to analyze the current facts or the possible impact(s) of the proposed land use changes. It seems to fall short of satisfying CEQA.

The traffic discussion in Section 4 omits to focus sufficiently on the true nature of Hollywood's traffic gridlock, which can occur at any time of any day or night. Whether it's a day time commute or a late evening when Hollywood's entertainment venues are open, the 101 can become bumper to bumper. Highland, Franklin, Hollywood, Sunset and Fountain can become impassable.

48-18

The occurrence of any of the award shows at the Kodak Theatre has similar impacts on traffic in the Hollywood CPA. The special two-week road closures during the annual Oscars hosted in Hollywood provide greater impacts. The multiple months season of the Hollywood Bowl already require massive expenditure for traffic mitigation and management. Hollywood Boulevard between Highland and Orange is closed almost weekly, and often more than once in any week to provide space for special events, like movie premieres. HHWNC helped to fund a website, [www.navigatehollywood.com](http://www.navigatehollywood.com), which helps to alert people to these problems.

However, these traffic problems are barely mentioned in the DEIR. In order to comply with CEQA, where is the appropriate analysis? Where are required mitigation measures to make the current conditions better, let alone those projected for 2030? Required traffic mitigations and improvements should be required before any additional development is authorized under the DEIR in HHWNC's area of the Hollywood CPA. Again, the DEIR should be revised to provide a description of the current fact and analyze the impact of the proposed land use changes. The DEIR doesn't seem to satisfy CEQA's requirements.

In Section 4.7's discussion of noise, the DEIR states at page 4.7-10 that there are no relevant impacts associated with the Burbank-Glendale-Pasadena Airport are just astoundingly false. The airport's management generally doesn't permit airplanes to fly over any of those three cities for their takeoffs and landings! Instead, airplanes' take-offs

48-19

generally are made in a southwest direction from the airport. Planes make a wide turn over the Studio City or North Hollywood areas. Just to the south of the airport, the Hollywood CPA's Laurel Canyon and Mulholland corridor areas get the sounds of each jet as those jets turn usually to go further west and north to reach their eventual flight paths and destinations! Similarly, incoming planes come into the airport by flying over North Hollywood from the west to east direction towards the airport's runways. The impact of local aviation from the Burbank-Glendale-Pasadena airport is significant, especially where you consider that hundreds of airplanes take off daily from the airport.

Similarly, the DEIR's noise section omits any discussion of the impact of helicopter noise. Leaving LAPD's helicopter units aside, experience shows that helicopter noise can and does occur throughout the days and nights in both the hillside and flatland communities in the CPA. Why is it appropriate to not consider the noise generated by these helicopters in the DEIR? Almost every morning news show in Los Angeles depends on flying helicopters over Hollywood to provide traffic, crime and other coverage on every weekday when cloud coverage doesn't preclude helicopters from flying. There are numerous other helicopters flying over Hollywood throughout the remainder of almost every day. Most of the helicopter traffic seems to emanate from the Van Nuys airport, but the Van Nuys airport isn't even mentioned in the DEIR. It's not a new airport. Again, the DEIR should be revised to accurately describe the current facts and analyze the impacts of proposed land use changes. The current DEIR doesn't seem to satisfy CEQA.

48-19  
cont.

While the Planning Department needs to go back to redrafting the DEIR to accurately describe the facts, the Planning Department also should proactively require mitigation measures and downsize various proposals for increasing growth. As I have stated several times in this letter, the environmental impacts need to be properly assessed in order to satisfy CEQA. Merely aspiring to obtain funding sources to make civic improvements to support additional density isn't (and shouldn't be) sufficient to clear the current DEIR as a prelude for adopting the proposed Hollywood Community Plan update.

48-20

As of yet, the DEIR doesn't represent SMART growth, but just provides incentives to provide more growth without improving Hollywood. Our goal should be to improve Hollywood, rather than merely to provide additional growth.

One additional point needs to be made. The new Small Subdivision Ordinance has generated several proposals for new and denser subdivisions in HHWNC's area. What HHWNC and the residents have seen is that the ordinance does not provide sufficient incentives or protections to guarantee good design proposals, amenities for future residents, landscaping and open space, adequate parking for residents and visitors, traffic flow, good plans for service vehicles, including trash pickups, and emergency managements services, such as LAFD and LAPD access. The Planning Department should assess the value of this ordinance, and also analyze its impact when the ordinance could be used in conjunction with the proposed land use changes in the CPU/CPA. This information and analysis would seem to be required in order for the DEIR to comply with CEQA.

48-21

I urge you to decline to approve the DEIR in its current form. The Planning Department should rewrite the DEIR to adequately discuss the environmental impacts with regard to the problems I've raised and make the corrections I've suggested. Until the DEIR complies with CEQA's requirements, the DEIR should be reviewed and revised. Real improvements should be mandated and required in HHWNC's area in the Hollywood CPU, and there should not be any additional development, density or zoning increases in HHWNC's area authorized per the Hollywood Community Plan Update until the Planning Department determines how the increases can be mitigated.

I suspect that it may even be appropriate to place a moratorium on implementing any land use changes which would increase density in the Hollywood CPU until a revised DEIR is written, recirculated and approved with mandated and required improvements for the entire Hollywood Community Plan Area.

The numerous deficiencies in the DEIR should be resolved before the Proposed Hollywood Community Plan is adopted. The resolution of these problems seems to be required now by CEQA as a condition precedent to any approval of the DEIR.

Sincerely,

Orrin Feldman

Via Emails

Cc: City Council President Eric Garcetti  
City Council Member Tom LaBonge  
City Council Member Paul Koretz  
LA County Supervisor Zev Yaroslavsky  
City Director of Planning Michael LoGrande  
City Planner Kevin Keller  
City Planner Mary Richardson



# Fwd: Comments re: The Hollywood Community Plan

1 message

**Srimal Hewawitharana** <srimal.hewawitharana@lacity.org>

Wed, Jun 1, 2011 at 4:03 PM

To: Mary Richardson <mary.richardson@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Wendy Lockwood <wl@siriusenvironmental.com>

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

From: **Terry L. Hake Church** <tl\_hake\_church@verizon.net>

Date: Wed, Jun 1, 2011 at 3:29 PM

Subject: Comments re: The Hollywood Community Plan

To: [Srimal.Hewawitharana@lacity.org](mailto:Srimal.Hewawitharana@lacity.org)

Sir,

Regarding the Hollywood Community Plan, I wish to comment on the fact that you have put too much density into the plan where such density is totally unnecessary. My first objection is that you are using year 2000 data when year 2010 data is available. The 2010 data clearly suggests the area (and Los Angeles as a whole) is losing population. Further, in 2004, SCAG was touting a number of 6 million in growth. Toward the end of that year, the California Department of Finance, the people that makes these estimates, reduced the the prediction to 4 million. These estimates covered the area that SCAG represented which, at the time, included 52% of the population of California as I recall. The numbers you are using are 50% greater than the number that the State of California has published as the "official" estimates.

49-1

49-2

Additionally I have communicated with several people, the comments are largely summed up in letters from one of them, Mr. Richard H. Platkin, AICP, a former planner for the City of Los Angeles. He makes these comments:

1) Most of the plan's policy language is irrelevant. No decision makers ever look at it in making budget or land use decisions, except for footnotes related to discretionary actions.

49-3

2) The focus of comments should be opposition to sections of the DEIR which sanction broad increases in density through general plan amendments and zone changes because:

-- These plan and LAMC amendments will become a template for dramatic increases in permitted densities in the remaining 34 community plans. Many private projects which now require discretionary actions will sail through as by-right projects.

-- There is no planning rationale for this up-planning and up-zoning based on the "growth neutrality" intent of the Genera Plan Framework Element. The



city, according to the Framework, has enormous untapped potential for population and housing expansion based on adopted plan designations and zones.

49-3  
cont.

To exceed local densities, you must have a clear rationale based on documented increases in population growth and housing demand which have outstripped locally permitted densities.

-- In fact, in the Hollywood Community Plan's implementation program of up-zoning and up-planning is proposing to encourage growth to meet secondary Framework goals, such as transit use. This is an approach which turn LA's growth neutral General Plan on its head and conflicts with Charter Sections 556 and 558, which require consistency with the intent and purposes of the General Plan. The role of transit is to serve the public's need for mobility, but calls to increase density as a tool to increase transit use absolutely conflict with the General Plan.

-- As far as we know, the city's infrastructure, which has not been monitored in over 11 years, cannot handle existing user demand, much less the demands of the larger population which might result from up-planning and up-zoning. Without demonstrated unused infrastructure capacity, there should be no increases in permitted density. Furthermore, there does not appear to be any proposal in the DEIR or the draft plan text to monitor local infrastructure conditions and the effectiveness of the updated Plan's policies and programs.

49-4

-- The DEIR uses year 2000 census data, even though current 2010 census is now available. This methodology conflicts with State of California General Plan guidelines for a city's general plan elements to be current and consistent.

49-5

Further, regarding the DEIR for the Hollywood Community Plan, he notes:

- 1) The DEIR never analyzed the build out capacity of existing residential zones. There is no evidence that it is not sufficient to absorb many more people without up-zoning or up-planning.
- 2) The DEIR does not use 2010 census data, which means it is not timely.
- 3) If they did use current data, it would demonstrate that Hollywood has had population loss, not population gain, and there is no rationale for increasing density to accomodate many more people they claim will be there by the year 2030.
- 4) The Plan and the DEIR also fails to incorporate any monitoring program, so if/when any of the population or infrastructure features change after adoption, there is not way to know and make appropriate changes to the plan and its implementation program.

49-6

49-7

I urge you to take this plan back to the table and come up with something sane.

49-8

Terry L. Hake-Church

Don G. Howard  
1823 Outpost Dr  
Los Angeles, CA 90068  
May 27, 2011

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENTAL  
PLANNING

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

On the west side of the first block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost Circle, which is inside a hillside residential neighborhood.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,

Don G. Howard



## Comments to ENV-2005-2158-EIR, Hollywood Community Plan Update

1 message

**edward <edvhunt@earthlink.net>**

**Wed, Jun 1, 2011 at 2:58 PM**

To: Srimal.Hewawitharana@lacity.org

Cc: Kevin' Keller <kevin.keller@lacity.org>, Mary Richardson <mary.rich@att.net>, Melrose Hill Neighborhood Association <melrosehill@yahoogroups.com>, hsdncboard@googlegroups.com, Alpha Design <alphadesignpartnership@yahoo.com>, Bob Blue <bob.b.blue@gmail.com>, "Hilton, Elizabeth" <ehilton@jsanet.com>

Dear Planners,

Here are my comments to the Hollywood Community Plan update: These are my PERSONAL comments and not those of organizations to which I belong:

My thanks to Kevin Keller and Mary Richardson that I know have worked very hard on this plan and I hope will respond to stakeholder comments with a greatly improved final document.

Basically this draft plan is a top down document with true emphasis in only one thing – up-zoning for greatly increasing density capacity so that virtually all projects are by right, thereby escaping community notice, scrutiny and input resulting in greatly diminished quality of planning and design. In addition to escaping public input, the reality is that there are a myriad of quality of life code requirements that do not apply to “by right” projects.

51-1

The population projections and associated counts are inaccurate and highly manipulated. The reality is that Hollywood substantially declined in population since the last census. My Hollywood Studio District Neighborhood Council area declined 8.9% to now 28,534 and my Melrose Hill Neighborhood declined 8.5% to 4,505 persons in 1490 housing units.

51-2

Hollywood also has enormous capacity for increased units, even without any of the projected up-zoning. Our neighborhood has capacity for about 80% expansion in the R-zoned areas with no zoning changes at all and that is without any SB 1818 changes which add easily another 35% in addition to automatic menu items and reduced parking.

51-3

Kevin and Mary have admitted that their population and capacity projections do not include current census information, accurate capacity surveys, projects recently constructed, projects entitled but not constructed or projects in the pipeline but not yet entitled; but instead are based on a “theoretical model.”

51-4

In spite of this reality, the plan proposes enormous up-zoning of several hundred percent. As an example, on

Melrose Avenue, a 2-lane street most of the day, no red bus; the plan proposes a 300% increase in FAR and permit RAS4 at one unit/400 sf of lot. At the same time the planners completely ignored 18 years of input from the adjacent neighborhoods for a plan for improving Melrose from the Studios to the Hollywood Freeway as a well designed pedestrian shopping district. Where the commercial properties back up to the HPOZ they propose a 3-story height, which means an automatic 4-story height for SB1818 projects right against the HPOZ R1 back yards. The point is the plan projects several percent of up-zoning while completely ignoring all community suggestions for quality planning and development.

51-5

The situation is similar on Western Avenue between Melrose and Santa Monica where the plan proposed again a 300% increase in FAR to FAR-3 and also permitting RAS4. This is of course in addition to SB1818 mandatory additional height and zoning increases. With a one block exception, these commercial properties directly back up to typical one story residential properties without even an alley as a buffer. On Santa Monica the plan proposes an FAR increase of 600% and also including RAS4.

To give you an idea of this density, the planning department recently approved a project at 5245 Santa Monica at 6 times the existing FAR for 5 stories height, 39 residential units plus almost 15,000 sf of commercial within a 150' wide site. If you do the math, that is one residential unit for every 3.8'. Using the same density on both sides of Santa Monica or Western, that works out to a capacity of one unit for every one foot, 11 inches (1'-11") plus the Commercial resulting in several hundred percent of the total projection on just these two streets through the plan area.

51-6

Now imagine a 5-story residential building of that density on Western Avenue backing up to the 1-story bungalows, duplexes and 2-story period apartments immediately adjacent. This overly high proposed zoning is true overkill and inappropriate. I can see this kind of density in the urban core, but not in these historic neighborhoods between Melrose and Santa Monica.

On June 27, 2006, at the request of the Planning Department for Plan input, the Hollywood Studio District Neighborhood Council sent in a 11 page letter of suggestions. To their credit, the planners recommend the proposed HPOZ for the portion north of Melrose Avenue between Paramount and the 101. These are stable 90 and 100-year old neighborhoods with a number of Courts. Unfortunately, most of the other quality of life, traffic easing, and parking suggestions were ignored in favor of density. I believe these should be reevaluated.

51-7

Hollywood as a community has matured and is declining in population. The opportunity should be to promote quality infill planning and design and not just mindless by right density.

51-8

Sincerely,

Edward Villareal Hunt, A.I.A., A.S.L.A.

Chair, HSDNC PLUM/Housing/Parks Committee

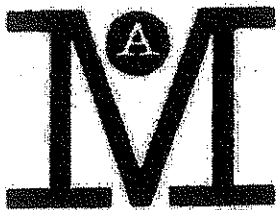
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May 26, 2011

**STATEMENT of J.H. McQUISTON on  
DEIR 2005-2158 HOLLYWOOD COMMUNITY PLAN REVISION**

Honorable Planning Department:

**Qualifications**

I am a graduate of Caltech and a Licensed Engineer by the State of California. I have lived continuously in the Hollywood-Plan area since 1933. I was elected to the Hollywood Project Area Committee and before that participated in every part of the CRA project for Hollywood. I checked each parcel in the Hollywood Plan for "highest and best use", for both the 1988 Plan Revision and the SNAP amendment. I served as the Planning Representative for the East Hollywood Community Association. I served as a Director of the Hollywood Media B I D. I served on Committees organized by Street Services and Sanitation. I serve on the Rampart Citizen's Police Advisory Board. I am known as an expert on the City's Budget.

I have advised numerous Neighborhood Councils on various important matters .

I commented to the City on policy and legality of numerous projects within and without the Hollywood Plan. All of the participation was *pro bono*.

**A. General Comments**

The DEIR is legally-defective in its particulars, which makes its conclusions legally-unsustainable per Section 1094.5, California Code of Civil Procedure. *See, e.g, Topanga Assn v County of Los Angeles*, 11 C3d 506, 514-516.

52-1

Data in the DEIR substantially-conflict with data derived from SCAG, from EIR's of the 1988 Plan and SNAP, and from Reports lately-issued by Planning and by CRA, concerning Hollywood.

52-2

Design controls may cause substantial litigation-with, and/or City payments to-, property owners on account of unsupportable City restrictions and amendments on use, configuration, design or special privileges for property.

52-3

**1. DEIR's Historical Misdirection Obscures DEIR's Raison d'Etre**

DEIR focuses its history wrongly on Hollywood movie-making, but **Hollywood's environment prospered and collapsed on account of Radio Broadcasting.**

Continental United States (excl Alaska) has four time zones. **In Radio's heyday there was no "tape".** Disc program- recording was inferior. **So, radio programs were repeated "live", with a three- hour interval between to cover East and West coasts.**

Performers of 15- to 30- minute shows **spent the interval at Hollywood businesses**, and so did their audiences and technicians; Hollywood shops ,restaurants and agencies depended on their patronage.

52-4

**Bing Crosby killed the Hollywood economy** after personally- obtaining a German "tape recorder" post- WWII; he persuaded a motor-manufacturer named "Ampex" to manufacture them. **Thereafter no one needed to lay-over in Hollywood; its economy was ruined.**

**Video studios with their smaller audiences moved elsewhere** since the radio halls were incompatible. **I personally saw stores, restaurants, agencies closing**, victims of the "technical obsolescence".

To recover, Hollywood looked elsewhere to regain visitors it needs for viability, but attracting and keeping visitors is tough. Former shops, restaurants, and agencies proved unsuitable. Hollywood required entirely-different planning.

2. **Movie, Film, and related Industries remain;** but Planning and CRA report that industrial space in Hollywood is insufficient to satisfy industrial needs. Commercial property by law being prohibited to industrial-size groups, "Hollywood" could reasonably- decide to locate elsewhere.

**Instead of expanding capacity to fill need, provide jobs, and bolster the economy, the Plan amendment wrongly- reduces industrial zoning by 58.2 acres and may cause the Hollywood recession to repeat.**

3. **The DEIR perpetuates segregation long after laws prohibit it.**

On TV, Honorable Lee Yuan Kew said that when Raffles laid-out Singapore, he set up mono-ethnic zones, to segregate. Lee said Singapore still suffers from Raffles' act.

Congressman John Lewis of Civil-rights fame lately told me that Los Angeles is the most-segregated city he has visited. The City praises ethnic ghettos, and zoning law acts to segregate economic classes.

Lily-white Hollywood used to mix palatial estates with multi-family flats, and mix single-family houses with apartment-houses. We matured knowing that "poor" didn't mean "stupid" or "inferior". People learned lessons regarding good and bad choices, due to that environment.

After WWII temporarily-disrupted ethnic segregation in East Hollywood, owners fled elsewhere and converted their East Hollywood houses to mega-units. Lily-white Hollywood householders denigrated as "trash" people living over or behind shops.

Because the City believes East Hollywood is where "they" (i.e, the "trash") live, East Hollywood was inundated with multiple-units (i.e, "put the density where "they" live, not on the Westside where "we" live). Single-family houses were demolished, or else Planning denies they exist. Absentee-owners are rife. A beneficial mix was destroyed on account of segregation-forces.

The 1988 Plan Revision occurred because the City was ordered to bring its General Plan and zoning into conformance by March 1988. Before amendment, the sum of City plans allowed for a population of 11 million, without appropriate reasoning and greatly in excess of any foreseeable census figure. There was a substantial excess of multiple-units and a substantial dearth of all infrastructure.

City-wide renters amount to 55 percent. 1988 proposed to cut Hollywood's 90 percent to 80 percent, but regardless Hollywood is unequally-burdened by its excess; its environment is degraded.

A Community Plan relying on "public transportation" abets discrimination; there is proof that "rich" classes don't "spend" the time it requires to utilize in spread-out Los Angeles. This DEIR relying on public transportation as panacea is unlawfully-discriminatory without any doubt.

Moreover, since the commercial base of Hollywood requires tourism, and visitors necessarily cannot use public transportation to visit remote sights quickly, substantial vehicular-traffic day and night is not just job-commuters and a reasonable assessment and cure is required.

Laws maintaining *de facto* City segregation despite Federal laws to the contrary substantially damage the City environment, exhausting its resources. It won't stop until the City takes corrective-action.

4. **The DEIR fails to show reasonableness of Plan population and lifestyle.**

Consolidated Hotels in its heyday throughout Hollywood converted parcels of two adjacent single-family houses into delightful, two-story 40-unit "homes", commanding very-reasonable un-subsidized rents. Sixty years later these units are still attractive to every class and ethnicity. Their designs are maintainable and energy-frugal, and inhabitants can be rescued by the City if various public-safety disruptions occur.

52-4  
Cont.

52-5

**DEIR errs by failing to assess environmental impacts of this class of housing. Its lifestyle-shock is minimal versus domiciles proposed in the Plan Amendment; moreover, demand for City resources and infrastructure is reduced by its two-story configuration.**

**The 1988 Plan Revision “accommodate[d] the year 2010 projected population, plus a 10-15 percent buffer [272,000 people, 122,000 housing units]. See EIR CPC 1070 (CRA area added)**

**SNAP, a narrow strip centered on the Red Line (East of the 101 Fwy but extending to Third St, below the Plan’s boundary at Melrose) increased 1988 Plan residential-density to 159,602 in its 2.3 sq mile area (69,392/ sq mile, instead of City- average 5,979/ sq mile). It also added 6,201 residential units at R3 sizing (but R4 permitted), At least 2/3 being within the Plan, 8,888 people were added to the 1988 population, totaling 281,000 people, 126,000 units. Expect piecemeal density- increases to occur on demand.**

**DEIR incorrectly reports “existing” capacity as “accommodating” just 235,850, and only 110,000 units. DEIR omitted a calculation showing why its incorrect statistical assertions could be valid.**

**Even accepting the DEIR’s over-extrapolated population and understated 1988 and SNAP values, the DEIR erroneously-concluded that “no project” is not environmentally-superior alternative if based simply on population and residential capacity.**

**But if its rationale depends on appropriateness of trend, then omitting 2010 data is wrong. Moreover, foreclosed or vacant housing within and without Los Angeles now constitute a large surplus which economists predict may not be used-up until 2023. Census data showing 20-percent fewer local children forecasts an overlooked population-decrease for 2030.**

**Even if further-introduction of City rail or other transportation increases City population, land values elsewhere indicate population may live elsewhere instead.**

**DEIR fails to prove its case as required by Section 1094.5**

**5. DEIR failed to show that cutting industrial capacity is environmentally-conservative.**

**Section 12, Los Angeles Zoning Code, prohibits production in any of the “commercial” zones if more than 5 (five) persons are engaged therein. “Production” includes “objects” like artwork, commercials, videos, films, compact discs, manuscripts, etc, on which the State would impose at retail a sales-tax. Hollywood needs adequate “industrial” acreage for its Media businesses, thereby to retain “Hollywood” for its business-model.**

**Industrial property differs from all others: Because there should be no street-pedestrians, police have reasonable cause to stop any pedestrians there, but they can concentrate more on commercial and residential properties.**

**Cutting industrial property not only deprives jobs but also increases policing and other costs.**

**The Mayor and CAO forecast severe cuts in existing City services, accelerating each following year for perhaps twelve succeeding years. Industrial- parcel properties need consolidation to drive out non-contributors, to free-up space and protect Hollywood from environmental failure.**

**The Revision of 1988 Listings:**

**“\* \* development capacity represents ‘practical’ capacity rather than maximum capacity of the Plan, based on the assumption that an individual parcel will *not* be redeveloped if existing square footage is more than 25% of the square footage permitted by the Plan, and existing buildings are not substantially deterior-ated, or existing buildings are of historical or architectural significance, or existing uses are open space, recreation, public, quasi-public or institutional.”**

<b>Industrial floor space:</b>	<b>CRA 5 million sq ft</b>	<b>All other 12 million sq ft (All 17 million)</b>
<b>Maximum Plan capacity:</b>	<b>CRA 11 million sq ft</b>	<b>All other 16 million sq ft (All 27 million)</b>
<b>Total practical acreage:</b>	<b>CRA 81 acres</b>	<b>All other 244 acres (All 325 acres)”</b>



The SNAP Revision:

Section 5D of SNAP permits Industrial use (up to 20 persons may do actual production of certain authorized items). The commercial and residential parcels permitted industrial uses are restricted to:

“Subarea B \* \* and Subarea C \* \* that have a lot line adjoining any of the following streets: Virgil Avenue, Vermont Avenue [Franklin to Melrose], Normandie Avenue [Franklin to Fountain], Western Avenue [Franklin to Fountain], Hollywood Blvd [Virgil to 101 Fwy], Sunset Blvd [Virgil to 101 Fwy], Fountain Ave [Virgil to Edgemont], Santa Monica Blvd [Virgil to Edgemont], and Melrose Ave [Virgil to Edgemont].”

Estimated Subarea parcels: 70 acres

Combining 1988 and SNAP Industrial Acreage:

Estimated acreage: 395 acres

Practical capacity: 367 acres (24 million square feet)

Per DEIR assumption, (550 square feet per employee): 43,636 employees in Industrial acreage

Comparing DEIR with above:

“Land Use Designation: Industrial Existing Plan (Acres) 292.2 Proposed Plan 278.6”

Apparent loss of zoning: 74.8 acres

Loss alleged in DEIR: 16.6 acres

DEIR discrepancy: 58.2 acres

Apparent jobs to lose: 6,900

DEIR’ claim of only 8.6 million square feet available in present Plan conflicts with the “practical capacity” of 24 million square feet from the 1988 and SNAP EIR. The error requires resolution before the Amendment progresses. In 2006 document, Planning and CRA asserted Plan’s Industrial properties are being almost fully-utilized, whereas the DEIR admits only to 36 percent.

52-6

Jobs to Population Balance

DEIR asserts that the Plan Amendment is designed so workers will live near their jobs.

It estimates the 2030 population at 249,682 and jobs at 130,203, for a jobs/population ratio of 0.52. DEIR fails to break down the number into Industrial jobs and commercial jobs.

The Media Industry comprises the majority of present industry in Hollywood. Industry presently lacks enough acreage in Hollywood; Planning-CRA Reported vacancy of only 2 percent. If expansion is denied, “Hollywood” will develop facilities in Los Angeles County outside the City.

Support facilities adjacent to studio facilities enable repetitive visits between them without arterial traffic. But executive and creative personnel probably will remain domiciled on the West Side and elsewhere. Thus the Plan’s jobs/population balance should be considerably higher than the norm.

**IT IS AXIOMATIC THAT MOST SERVICE-PERSONNEL WILL NOT RESIDE IN THE PLAN,** because the cost of high-FAR or high-rise residences dissuades or prohibits their occupancies. Therefore, commercial uses catering on tourists and using low-wage personnel should not be located near industrial-zoned Plan parcels.

6. Since the last Plan Amendment LAUSD built numerous schools therein without regard to Plan zoning. Plan should re-site units suitable for school-age children close to schools respectively-suitable for the childrens’ ages, observing that aging moves parents to other domiciles as children eventually leave. The process will expose locations suitable for various commercial-support limited to a few scattered parcels close-by. Nothing in the Amendment addresses this important environmental issue.

52-7

7. Although DEIR recognized that the 90% living in the “flats”mostly have very-low incomes, and the 10% living in the “hills” have little commercial contact, it failed to recognize that unique situation and its effect on the Plan’s environment. DEIR erred because this substantial environmental defect was not addressed.

52-8

8. This Comment concerns *presentations* of conclusions regarding zone alterations.

The definition of SCAG Data sets forth that the Data in DEIR came instead from Planning and encompasses only a period of unparalleled growth prior to the “great collapse of 2007-08”. Economists predict no recovery for at least a decade. Extrapolation of growth before collapse to draw conclusions thereafter is improper.

The 1988 Plan assigned numbering to the subareas in the Plan. These numbers have been used in zoning matters except for this Plan revision. Substituting new numbering in this revision for subareas made it difficult to cross-check restrictions for consistency and legal-justification.

Adding or removing restrictions on land without “equal protection of law” for similar, adjacent lands runs afoul of Section 65906, California Government Code and Amendment XIV, U.S. Constitution. The California Supreme Court in *Topanga Assn v County of Los Angeles*, 11 C 3d at 520, said breaking-up or altering land already carefully-planned for “highest and best use” is rarely legally-justifiable, and cannot focus exclusively “on the qualities of the property” because “these data lack legal significance”.

In *World Wide Rush v City of Los Angeles*, Nos 08-56454, 09-55792, 09-55791, CA9 (2010), the Federal Court of Appeal cited the City’s Zoning-Code statement of purpose, “to ‘promote safety and welfare’”. The Court accepted the purpose as a necessary exception to Amendment I, allowing the City to “take” a right without compensation therefor (although in *WWR* the Constitutional issue was Amendment I, the same reasoning applies to Amendment XIV and *WWR* also indirectly applied XIV in deciding).

52-8  
Cont.

DEIR fails to explain why the City’s zoning changes do not damage the City environment by loss of successful inverse-condemnation actions. Each change needs a rationale which is not mere *ipse dixit* but legally-pertinent.

City planners may have overlooked the foregoing *Topanga* and *WWR* restraints, which underlie the decision against the City in *Philip Anaya v City of Los Angeles*, No BS 099892 (Sup Ct 2006), ( from which the City did not appeal). *Anaya* mandates setting-forth legally-pertinent rationales per *Topanga*.

9. Subsequent to the Court-mandated 1988 Plan Revision, the voters approved an entirely-different form of government for the City. The Charter removed Executive power from the Council and returned it to the Mayor, who controls the Planning Department.

The re-structure obsoleted the proposition that the Plan is “advisory for the Council”; as an Ordinance it is law “Required to be executed” by the Mayor. Laws are not permitted to be “vague”.

52-9

DEIR incorrectly validates major and contentious parts of the revision only by leaving the issues to be addressed in another document following adoption of this Revision. But since the tactic leaves the Plan’s impact on the environment legally-vague, the DEIR is incomplete and faulty.

10. Budget cuts in coming years will cut the City’s Summer Youth Jobs and Summer Night Lights programs. Youth employment for FY 2011-12 plummets from over 10,000 to just 250-750. Most is outside Hollywood even though it has a large youth population compared to other Plans.

52-10

DEIR must address how the environment will cope with increased shortfall of City youth-opportunities.

11. Experience with SNAP should be a Warning regarding Goals and CD Adherence

SNAP was enacted in 2000, over 11 years ago. Several years ago one veteran CD Planning Chief admitted she hadn’t even looked it over until then. No CD has ever insisted on following its law. The Planning Dept won’t follow it either . (NIH Rules!)

52-11

I’m sorry, but Planning’ labor over this Plan’s niceties will get SNAP’s fate unless the Mayor exerts the authority given him by the present City Charter and forces CDs to cease scoffing at City laws on Planning and Zoning. It’s high time for the Mayor to do so, But Plan and DEIR need re-writing.

## B. Prior and Continuing Statements Believed Necessary and Appropriate for Plan and DEIR

### 1. May 24, 2005

“Honorable Con Howe, Director, and Members of the Planning Department:

In 1988, the Hollywood Plan was down-zoned to be consistent with the existing City Plan. This action was taken in response to State legislation, and a court order following a lawsuit, which required the General Plan and zoning to be brought into conformance by March 1988.

The specifics of zoning in the Hollywood Plan were executed by Gruen Associates, the only instance where an independent contractor performed a Plan revision for the City of Los Angeles. The details were set forth in the *Hollywood Community Plan Revision: Background Report*, Gruen Associates, July 15, 1987.

The Gruen Recommendations for zoning everywhere in the Hollywood Plan are contained in the Table of City Plan Case No. 86-831 GPC.

The Final Environmental Impact Report for the Hollywood Community Plan Revision is EIR No. CPC 1070-GP/ZC, SCH No. 87112504, citing specifics from the *Gruen* work.

However, the Plan left to the CRA the assignment of zoning within the 1100-acre Hollywood Redevelopment Project Area. The CRA published an EIR January, 1986, (SCH 85052903) which was incorporated within the EIR of the Hollywood Plan, and the zoning which the CRA suggested was incorporated in the 1988 Plan.

Since 1988, the City published an amendment, which was designated as a “Framework”, to its General Plan. Under City Plan Case No. 94-03554(GPF) supported by EIR No. 94-0212, SCH No. 94071030, the City essentially increased its population capacity while “managing Los Angeles’ continued growth and will provide strategies to promote a *more livable and economically strong city*”. (Emphasis added.)

The *raison d’etre* listed in the Framework is that the “transit system assumed in the Centers Concept was not implemented. \* \* \* More critically, the goals and policies of the Centers Concept were not linked to programs for their implementation. Thus real growth did not necessarily occur in the patterns envisioned in the Centers Concept \* \* \*. In addition, growth experienced in the 1980's had significant environmental impacts. \* \* \* More recently, [there are] further strains on the City’s ability to provide services and ‘community livability’, reinforcing the need for comprehensive planning.” (Emphasis added.)

The City Council articulated specific goals for the City Plan:

Revitalize depressed communities.	Support the creation of new jobs.	Stimulate the production
of affordable housing.	Distribute public resources Citywide.	Provide adequate parks.
Reduce traffic.	Encourage pedestrians.	Get a more-livable City.

In January 2001 the City enacted Ordinance 173749, the Specific Plan entitled Vermont/Western Station Neighborhood Area Plan (“SNAP”) covering 2.2 square miles within the Hollywood and Wilshire Plans, and *supreme* over such Plans (and the proposed amendments thereto). SNAP substantially increased the by-right population without providing any additional infrastructure nor employment areas. The population density in the SNAP area *by right* is 69,392 per square mile. The population density when SNAP was enacted ranged, within its parts, from 10,000 to 30,000 per square mile. A proposal to plan the area at a density of 20,302 per square mile, with appropriate infrastructure additions including elementary, middle, and high schools, and also local and community park facilities complying with the City requirements, was rejected by the Planning Department.

At that time, the Citywide population density was about 8,000 per square mile.

#### 1988 Hollywood Plan

To update reasonably the 1988 Plan the Environmental Impact must be analyzed with knowledge of its EIR analysis and results therefrom.

The methodology Gruen pursued was to walk every parcel and to propose its highest and best use, provided that the *environment was placed in its best condition* by so doing. Gruen concluded that **substantial mitigation was required just to achieve the down-zoned level it proposed. The infrastructure could not handle the existing population, even down-zoned.**

#### 2001 SNAP

To incorporate SNAP into an amended Hollywood Plan will necessarily require further down-zoning ,**unless substantial infrastructure additions occur, and unless additional employment provisions are created.**

#### Framework

A flaw in the Framework *promotes segregation*. It fails to deliver the Council’s goals as stated above, because:

It aims to preserve “single family housing”, but fails to recognize as such, any lot **not zoned exclusively for such use. Thousands of such housing in the Hollywood Plan are being ignored thereby.**

It aims to “increase density on *existing* public-transportation routes”, which effectively keeps high-income areas

“safe from density increases” while subjecting low-income areas to absorb all the population, but grants no parks, schools, or other infrastructure.

It fails to provide sufficient mix of employment opportunities in the areas it designates for its populations.

It dictates a lifestyle on areas, which segregates people according to race and culture.

### Hollywood Plan Amendment EIR

#### Reiterate and Support Goals of Prior Plan

An EIR addressing an amendment to the Hollywood Plan will have to address how the amendment will achieve the goals set forth in the Framework, noting also the Framework flaws, and how that environment will be compatible with the statistical projection for the City as a whole during the period set forth for the Plan. And, how Hollywood goals will be served.

Neighborhood Councils, Area Associations, Chambers of Commerce, Business Improvement Districts, Parent-Teacher Associations, and other socially-interested groups and individuals want to see a *comprehensive* EIR which *will show that the goals of the Framework and Hollywood will be attained by the Plan.*

#### Prove Pedestrian-capability

The East Hollywood Community Association is especially concerned that no attention has been given to the environmental effect of segregating uses into long strips, which *prohibits pedestrian activity.*

#### Provide Protection of City Standards for Infrastructure

We are concerned because the environment *lacks local and community recreational and child-care centers.* The lack thereof is critical and *substantially degrades the environment.* There can be no mitigation for the lack thereof. The City standard to provide one acre of local park per 1000 people *within 1 mile*, plus one acre of community park per 1,000 people *within 3 miles* does not count regional parks such as Griffith and Barnsdall. The area in the 1988 Plan was intended to serve a population of 199,000 *plus the CRA population of 87,900*, or a total of 286,900. Local and community parks require 572 acres divided into 114 separate parks not counting Griffith nor Barnsdall. No parks in this area comply with the standard.

Lack of suitable and supervised recreation/child care parks promotes juvenile crime and repels development. This environmental hazard is substantial and must be mitigated in the Plan, by *providing for their inclusion.*

#### Balance jobs, housing, and services to Minimize Traffic Requirements

The East Hollywood Community is concerned because the amendment willy-nilly increases density of residents without providing *additional acreage* with which to develop workplaces for them. This is a substantial hazard for the environment, because it will increase traffic *even if the residents resort to public transportation.*

Buses with their frequent stops on narrow Hollywood streets disrupt the even flow of traffic, also.

The E.I.R. must address how the expected population may reasonably-conduct their daily routines without social impact from time lost commuting, health impairment from increased air pollution, electrical power excesses from loss of air quality and heat/cold amelioration, and it must show some positive locational inducements.

#### Keep the Manufacturing Reserve in the Hollywood Plan commensurate with the population increase

In the Manufacturing District known as Hollywood Media B.I.D, there is pressure to convert from manufacturing to commercial zoning. Such conversion would reap a *windfall profit for speculators*, inasmuch as commercial property is valued *substantially higher* than industrial property. The collapse of the freeway route from the area toward both Downtown and Century City caused pullout of major manufacturers, because no economical truck routes now serve the area.

Nonetheless, a substantial amount of Hollywood-plan residents should work in the B.I.D. area. Manufacturing is capable of employing the *greatest number of workers in the least area.* If the residential population is to be increased it follows that *the manufacturing area must increase proportionately.* The E.I.R. *must address that point, and prove compliance.* Probably at least 5,000 additional jobs should be located therein.

The Media B.I.D. area was formulated as a *reserve for manufacturing*, similar to areas which were designated as reserves for agriculture. Unique in the MR zone code is the statement of purpose. Purpose is not shown in other zoning categories, and states:

“Purpose: 1. To protect industrial land for industrial use, and *prohibit unrelated commercial and other non-industrial uses.*”

Establishment of the MR-1 zone protected our Hollywood film, recording, and television industry. It halted the runaway flight caused by conversion of land to non-industrial use.

We believe the MR-1 zone cannot be densified merely by adding another story on a parcel. Most industrial purposes must be conducted at ground-floor level. Yet there must be an expansion of the available acreage to keep “Hollywood” in Hollywood. It could be made more compact yet larger.

It would be a substantial catastrophe in Hollywood for every person, if Hollywood is deserted by the media industry.

The E.I.R. must address the issue and mitigate the overcrowding, probably by reducing the residential area surrounding the Media District in order to increase compactly the MR area, and by readjusting density of allowable residences elsewhere.

The Police Departments in the United States depend on the zoning to exclude pedestrians in a manufacturing zone. It is a fact that when this is observed, police may devote more time to commercial and residential zones, because they are not deterred by nefarious pedestrians in the manufacturing zone. A pedestrian in a manufacturing zone, being rare and out of character, may be taken to be a threat and accosted. This only works if the zone is compact and free of commercial operations.

The preservation of manufacturing preserves is *not assisted merely by a Q designation*. The preservation is assured *only with the "R" restriction*. For example, the Wilshire-zone Q designations resemble thus: "Subarea 941. The use of the property shall be limited to those uses permitted by the R2 and P zones." The Q just doesn't do the trick, and is not accompanied by a purpose, so it is usually ignored in practice.

Consider growth of population tied to growth of employment potential

Hollywood is limited by the narrow streets, regarding movement of traffic. The 1988 plan predicted LOS F for 28 of 39 intersections studied, even at the population/business level in the adopted Plan. We know it is getting worse. *Much of the traffic congestion is always present*. "Rush hour" is practically 24/7 now. Topography substantially limits amelioration.

Adjustment of zoning and its distribution may be a means to mitigate some of the traffic congestion. It is folly to believe that Southern Californians, outdoors-people, will merely retreat to their cubicles like perhaps people in snowbound climes. And, our traditions and wants, plus our aerospace history, directs us to being long-distance travelers; here, where time is of the essence, the automobile *must be served by the City Plan*.

Safety

Policing in Hollywood involves many types of street criminals. The Police recommend *designing for safety*. The E.I.R. must show that the Plan is designed to be safe.

Hillside Streets Are Too Narrow for Adequate Fire Protection

The Fire Dept discovered this year that parking on hilly streets prevented timely responses. Life was lost. The E.I.R. must mitigate or else propose an alternative to the present street widths so that the hillsides will be safe.

Seismic threat

Hollywood is within the system of at least three major fault systems, each of which carries a prediction of generating a seism having a ground motion of at least 6 feet and a magnitude of over 7. Our Code does not protect people's lives from such a seism. To encourage density in a known seismic field could probably not only cost the City hundreds of billions of dollars, but also it could be determined to be criminal negligence.

The E.I.R. must address this issue and explain how it may be mitigated.

Besides the above, the EHCA believes the E.I.R. must address the CEQA minimums, plus also:

- Relation to Hollywood Redevelopment Area and controls thereon
- Slope preservation and density
- Cluster zoning for pedestrian encouragement
- Distributed zoning for neighborhood-building
- School placement relative to busy streets and commercial areas
- Circulation within and without the Plan
- Conservation and effect it has on segregation
- continuance
- Non-conforming uses and time limitations
- Public and Private Parking
- Conversion controls on using garages for non-parking uses
- Enlargement of garages to meet modern auto standards
- Homeless shelters and public restrooms
- Public nuisances and mitigation
- Justification of Plan Amendment if parts incapable of mitigation
- Relationship of CRA authority over planning in Amended Hollywood Plan

Establishment of Standards for each of the Council Goals and their Achievement and Verification thereof

NOTE: We request per Sec 54954.1, California Government Code, to be notified (FAX ok) reasonably in advance of every meeting the Department holds on the subject of the Hollywood Plan and its parts."

**Note the call to implement the Parks Requirement of the Framework. Inasmuch as the population of the Plan is larger than 2,000 per square mile, parks for 2,000 must not be separated by 2 miles, but must be closer. E.g, at a density of 20,000 per sq mi there must be 40 parks within the square if only 1 acre, or 8 parks within the square if regulation-size 5 acres.**

**To accommodate the required parks for the Plan (112 five-acre parks properly-situated) Planning must zone residences to surround park open-space and locate in juxtaposition with schools, or else the Framework requirement will cause the Plan and zoning to be invalid and vulnerable to defeat.**

The environmental cost of the parks must be addressed in the DEIR. Who will pay? Not Quimby, not

developers, not Parks First (SNAP).

## 2. July 5, 2005

**"Section 65860, California Government Code, requires the Hollywood Plan to conform to City and County Plans.**

The 1988 Hollywood Plan was created by an independent planning firm, as a consequence of a court action filed by a coalition, because the Plan did not conform to the General Plan. Downzoning, that firm considered the effects of housing diversification, balance of jobs with housing, occupational diversity, traffic, parking, schools, recreation and parks, and other issues before determining the acceptable mix of zoning for the area.

However, the 2001 Vermont/Western Station Neighborhood Area Plan re-introduced housing capacity without adding any infrastructure and without adding job capacity to the 1988 Plan.

### Reservations

Several Sections of the California Government Code highly restrict the options available for the current update. We are concerned because **State Code requirements appear to be ignored by this update.** Failure to comply may cause not only economic hardship for the City but also may cause a "rustbelt" condition in later years.

We believe it is **imperative to follow the State Code,** especially because of the built-out condition of Hollywood.

### Jobs-Housing Balance Issue

There is already a massive population increase allowed by the lately-enacted Vermont-Western Station Neighborhood Area Plan (a Special Plan which by statute overrules the present and future Hollywood Plan). It allows by-right a Plan-population increase of perhaps 30,000 without affording more job locations than those in the 1988 Plan.

We believe the additional population increase in the Plan revision cannot be assimilated, unless more parcels may be *local* workplaces. Specifically-lacking in Hollywood are workplaces where *typical Hollywood residents and workers may work.* If such are not prescribed, the additional residents will have to travel elsewhere to make a living.

**A FAR increase alone will not provide for new jobs. Jobs usually require ground-level locations.**

Moreover, the spectacular increase in Plan parcel values makes it questionable whether business will expand to compete with high-density housing for locations in the Hollywood Plan area, **unless the Plan is revised.**

52-14

### Single Room Occupancies

Currently homeless are being transported daily to Hollywood from Downtown, to relieve Downtown of their presence during daytime. There is an implied movement to create more single-room units in Hollywood so that the homeless may stay there at night rather than being transported daily. We believe creating single room units out of the presently-zoned **restricted manufacturing zone** would result in the loss of manufacturing jobs.

**"Hollywood" would cease to be Hollywood.** The City would no longer be a film capital and would also lose its tourists and associated businesses.

**If single room units are to be added, they should be situated away from the manufacturing zone and close to heavy commercial zoning.** Specifically, **the existence of the MR Zone in Hollywood must not be threatened by introducing zoning susceptible to use as SRO units nearby.**

**Recreation Issue:** Local and community recreation and park land were notably deficient in the 1988 Plan.

The General Plan for Los Angeles prescribed two levels of park and recreation opportunities. A denser City intensifies the consequence of shorting local and community recreation and park locations. Reports cited by the City Planning Department call for correcting the deficiencies. **A managed park must contain at least 5 acres, per City criteria . Griffith and Barnsdall Parks do not qualify as local or community parks. The Hollywood Plan contains almost no local or community parks. The Plan is short by about 500 acres, for the required 109-more separate and accessible local recreational facilities.**

Surrounding the parks could be high-density housing and jobs. The parks will stimulate redeployment of jobs and residences. **Organized supervised recreation provides valuable training in teamwork and competition, while providing a necessary outlet for the energy people would otherwise spend on nefarious acts.**

### Schools

Recent construction by public and private schools removed commercial and industrial parcels and separated schools and residences. Invading business and industrial areas with schools subjects students to physical jeopardy, besides making transportation more difficult.

Schools should [have] be[en] sited according to the level of their students: small children need to be close, without exposure to traffic, whereas larger children require access to public transportation.

For safety, **schools cannot be used also for public recreation; but a public facility next to a school could provide the playground for the school..**

### Mobility

**Article 2.9, California Government Code, beginning at Section 65890, declares that the State's policy is to provide jobs**

close to residences, to minimize traffic generation. That is also SCAG, CRA, and MTA policy, and the City Planning Director endorsed it publicly.

The 1988 Hollywood EIR expressed concern, because most street intersections in the Plan clog even with the lower density prescribed by that Plan. No streets have been altered to escape the intense gridlock that was predicted and is coming to actuality.

Eastern-based models for mobility cannot prevail in Southern California. The radically dissimilar climate promotes a different lifestyle. Autos operate cheaply. Distances to destinations (due to inappropriate prior zoning) make time-consuming public transportation uneconomic for most residents.

Jobs increasingly require mobility. Widely-separated attractions encourage families to own many vehicles, even if they are not all used.

The Santa Monicas divide the City, congesting traffic at the few passes. Lacking valley jobs, cross and through traffic is the result. A more-equitable residential/jobs/diversions City Plan is imperative for good planning.

The Hollywood Plan is thus beset with "gateway" traffic having no connection to the Plan area. The paucity of gateways through the Santa Monicas is handicapping the Plan's businesses and residents.

Hollywood was laid out in the Model-T Era. Most of its streets are now deemed too narrow. Widening to relieve traffic and increase mobility would severely reduce major parcels and cause substantial destruction of buildings. But adding more buses on narrow streets, by their stop-and-go will reduce mobility. *Street widening remains a substantial issue to be resolved before promoting additional population.*

A remedy may be to require retrofitting parcels to increase on-site parking. Presently, Model-T width garages may not accommodate a single on-site auto. Some garages have been converted (legally or otherwise) into residences, or other non-garage uses, leaving no on-site parking whatsoever.

There should be (1) an inspection requirement, to ascertain the uses of all garages and parking places in the Plan area, and (2) remedial action, to cure out-of-Code uses. Absent C of C for non-Code use, no grandfathering should be permitted to apply to Code-noncompliant parking.

Governmental use of parcels should comply with Code requirements for on-site parking. It is unfair to require others to comply if governments do not.

Removing parcel-sited autos from on-street parking may mitigate traffic jams. Licenses should be checked by computer against address and on-site garaging. Preferential street parking should not be allowed if on-site garaging ability is less than the Code capability.

Residential properties are required to have garages, while business properties may be exempt. The intent is to let visitors park on the street. State Code permits cities to enact preferential street parking for businesses, but Los Angeles does not now do so. Contrarily, residents now get street-parking permits for their vehicles because they do not use their garages for parking.

Exceptions arise because the City cannot require State schools provide off-street parking. Students may flood streets with their vehicles, excluding all else, unless preferential parking restores a reasonable balance. The Hollywood Plan does contain State schools which have little on-site parking.

#### **Protective Overlays**

A neighborhood might propose a Protective Overlay to escape taking its share of density; but the Plan must assure that the Plan is as homogeneous as practical, to remove unnecessary and unfair congestion elsewhere.

## **2. Specific Amendments**

### **A. Normandie from Melrose to Hollywood**

Downgrading Wilton put stress on Normandie as a means of traverse. The noise and congestion makes it doubtful that Normandie between Melrose and Hollywood should remain solely residential.

Until the Hollywood Freeway was begun, Normandie in that area contained many local convenience stores, for food and incidentals. Normandie is within pedestrian distance to a large population, who now are procuring items from unlawful curbside vehicles.

Restoring commercial uses to Normandie will curb the unlawful, unsanitary sales from vehicles. It will provide access to needed stores for pedestrians. It will add jobs for residents. It can promote mixed uses.

A suitable zoning amendment may be CR or C1, situated at cross streets and nearby but not uniformly as a strip-zoning which does not encourage a pedestrian milieu

### **B. Melrose from Western to Freeway Overcrossing**

This stretch suffers because Melrose needs widening to match the width west of Western.

We believe Melrose should be widened on the south side to match west of Western. Widening may cease at the freeway overpass.

52-14  
Cont.

52-15

52-16

Because the freeway link from Vermont to Century City was canceled, traffic on Melrose (and to some extent on other east-west avenues) is now substantial and will no-doubt stay choked unless this segment is widened.

**C. Mariposa from Santa Monica southward to cul-de-sac**

This dead-end segment is exceptionally ripe for conversion to local recreation, with a mixed-use wall at Santa Monica. By vacating the street and converting properties lining it, there is a perfect area for a badly-needed park facility which will comply with City standards for such supervised sports facilities. A soccer field, day-care center, and other amenities encourages densification in the area as well as eliminating blight and criminal activity on this street.

52-17

This amendment converts all properties facing on the dead-end street, except those on Santa Monica, to PF. A few properties on Normandie may be added at a later date, but the intent is (1) to keep park visitation to locals by shielding the park from sight of major streets, and (2) to keep the park close to the two major schools and to other public-interest facilities close-by this location.

There is no other location which conforms to the City requisites for conversion to a local recreation center.

**D. Fountain and Harvard southward**

This dead end segment provides another street and facing properties suitable for local recreation. The existing properties are becoming or are blighted, but adjacent properties are densified.

Conversion provides another badly-needed recreational/ child-care facility. It is situated close to new school developments, is off major highway, and can support use as soccer field.

52-18

Development as a recreational facility also supports commercial development at Normandie and on Fountain. Zoning amendment should be to PF.”

Not enough of the above suggestions are incorporated into the Plan Revision yet to make it viable.

**3. March 3, 2006**

“TO: Jose Romero And Mary Richardson FROM: Jim McQuiston March 6, 2006  
SUBJECT: SNAP Zoning in Hollywood Plan

There is no C-2 remaining in the SNAP part of the existing Hollywood Plan. Refer to Ordinance 173749:

- 1. Section 3 B threw out any conflicting underlying zones. SNAP is paramount to the Hollywood Plan of the 1980's and must be obeyed as it states the zoning.
- 2. Section 7 B limits commercial property uses to “Neighborhood Retail” and “Neighborhood Serving” and ground-floor limited. NO C-2 uses. (Areas “A”)
- 3. Section 8 A limits commercial property uses to C1.5 except for controlled Live/Work and Small Assembly workshops. NO C-2 uses. (Areas “B”)
- 4. Section 9 A limits commercial property uses to C4 except for hospital and medical uses, Live/Work and Small Assembly workshops. NO C-2 uses. (Areas “C”)

52-19

Your proposal lists areas in SNAP as having existing C-2, and is incorrect. You may not amend SNAP with a change to the Hollywood Plan.

We bitterly objected to eliminating all C-2 in SNAP, at its development, but Planning decided (and City Council agreed after hearing our objections) to eliminate all C-2.”

C-2 entitling freer use of land, a City liability for prohibiting C-2 per 173749 from enactment to repeal will ensue. The liability will be based on the differential-value loss in the period of prohibition. If C-2 designation is removed from maps showing SNAP, it is merely a technical correction because the SNAP Ordinance is supreme over the Plan designation. See, e.g. City of Redondo Beach v Cate, 136 Cal 146 S Ct 1902) ( Law for specific area overrides law for general area ).

**4. July 3, 2006**

Honorable Director Gail Goldberg:

The Hollywood Plan presently in force is not being followed by the Planning Department. There is in force a Specific Plan within and without its boundary, namely the Vermont-Western Station Neighborhood Area Plan (“SNAP”). That Specific Plan was duly enacted by Ordinance 173749, January 29, 2000.

52-20

Section 3B of SNAP established its supremacy over and supersedure of the Hollywood Plan and all of the Planning Code pertaining to its area. The plain language of SNAP may not be mis-interpreted otherwise.

If the Hollywood Plan Amendments proposed in the Update will have any force in the SNAP area, then there must be a corresponding amendment of SNAP. Agreement on such an amendment is highly unlikely.



The SNAP area was divided into several sub-areas, each area being "substantially re-zoned" as specified within SNAP itself. The May 31 Draft violates those zonings. Moreover, SNAP permits specified manufacturing where otherwise prohibited in the commercial zones. The May 31 Draft fails to address those permitted uses.

Prominently, SNAP prohibits all commercial uses above C-4, and highly restricts most commercial uses and parking uses. The May 31 Draft violates the prohibitions.

**Rather than inviting lawsuits as the City densifies certain areas and not other but "equal" areas, there are some imaginative approaches that the City could adopt:**

- 1. Restrictions on transitional height** should be amended, so that neighboring properties shall be assumed to be developed to their maximum-allowable height-limits before measuring the transitional-height limit of a property. This amendment will justifiably-relieve a substantial restriction on densification, while curing a potential liability for compensation which the City might incur otherwise.
  - 2. Where the walking distance to a transit stop is less than 700 ft along a sidewalk in Hollywood**, density should not occur in the substantial presence of exhaust fumes. It makes no sense to place people in jeopardy where they reside, especially now that it was established that schools are unfit to be placed there, and the time in a school is less than the time at a residence.
  - 3. Look to "even out" the placement of areas to work, to play, to learn, and to reside. Make the population mix more homogeneous throughout Los Angeles. Cut down on the need to travel distances to those areas.** Establish ratios for the City as a whole and areas also. Provide a maximum deviation from the City-wide ratio which will be permitted an area. This will provide needed development where otherwise it will not be provided.
  - 4. Enact requirements which control development based in-part on an equitable allocation of transportation rights.** The first development should not capture the transportation-capacity of the entire neighborhood, but only that allocable to the land-area of that development.
  - 5. Recognize the reality of life in Los Angeles** with regard to work schedules, family commitments, and the natural environment. People must carry loads when they shop here. There is no way to schedule deliveries by third party carriers. Public transportation can't handle a week's groceries nor a large-screen TV. There must be adequate circulation and parking near shopping centers, closely-situated to large residential developments also.
  - 6. Recognize the necessity for putting 5-acre supervised playgrounds within 700 ft, coupled with substantial density nearby.** The Draft proposes only linear development, which will not permit "walking neighborhoods" nor permit activities conducive to public safety and welfare. Hollywood didn't need playgrounds before; yards were large enough when it was bungalows and vacant-lots. **Now is a new era and infrastructure is desperately needed.**
  - 7. It is time to budget for the acquisition of infrastructure areas.** Properties in East Hollywood which sold about 10 years ago are now selling for 20 times the price. Although the City has enjoyed a substantial return on invested capital before, it cannot find a better investment now than purchasing infrastructure. There is sufficient City money at hand that can be used for that purpose. **Planning should take a leading role in such.**
  - 8. There should be an adjustment of properties along traditional thoroughfares that recognizes the effect on neighborhoods as traffic increases. Namely: Wilton, Bronson, Van Ness, Fountain, Normandie, Edgemont, Selma, Romaine, and Willoughby** are candidates for limited "CR" zoning, so that small shopping areas will be allowed to grow there and not pushcart and truck sales. The May 31 Draft did not create any such zoning.
- We will be pleased to confer and assist in the Hollywood Plan amendments, just as we participated in the 1988 Down-zoning as devised by Gruen Associates (the only Plan not devised by the Planning Department).**

Respectfully submitted, /s/ J. H. McQuiston, P.E.

### **C. Specific Edits Requested in DEIR**

The comments herein do not cover all shortcomings of interest in the DEIR, just those few for which there was time to comment. A comment on a particular item does not mean no other comment on the item is appropriate or necessary.

xi. Alquist-Priolo: Sec 2822(b), Calif Public Resources Code, says: "Concerned jurisdictions shall submit all comments to the State Mining and Geology Board \* \* \*".

The City is a concerned jurisdiction and by law *must assist the State to identify faults and to notify the State regarding their whereabouts if any are missing or mismapped* on State maps. The Definition as set forth in DEIR is substantially-misleading because it implies the City has no mandate to assist the State.

xii. Earthquake: Earthquake potential when strong is set forth by potential displacement and acceleration besides a Richter number, which number is a logarithmic scale. Other scales than Richter measure destructive force. Building Code neither protects property from earthquake damage nor persons from injury, particularly-not from strong-motion occurrences.

Existing Hollywood Plan: Add after “adopted”: “in 1986 (CRA area) and “. Add after “through” : “Special Plan, Charter and” .

Fault: Remove last sentence and replace with: A fault line may be on a slant, which may reflect or intensify the effect of an earthquake on that fault, or from any other fault. Remove “surface” and “within the last 11,000 years,”.

xiii: Seismicity: Add to hazards: Collapse, Upset, Fire, Death, Injury, Property Damage, . Add: Hazards may be the result of a remote seismic occurrence.

xiv: Proposed Update: Add after “Plan”: “including the CRA Area” .

xv: SCAG Forecast: Add after “rate.” : The period omitted the current recession and its effects on the Plan.”

1.1 Add before “On”: “In 1986 and” , and after “Plan” add “as mandated by Court settlement”

1.4 Uniformity with Regional Transportation, in the Hollywood economy, is less a factor than others and was mistakenly-set forth otherwise.

2.0 Delete sentence: “Hollywood is a prime location for transit-oriented development.” Delete part of sentence after “choices”.

Project Location: ( Franklin is an avenue not a boulevard; “Rivers” is “River”),

Major corridors in E. Hollywood include Melrose, Santa Monica, Sunset, Hollywood, Franklin, and Fountain (E-W), and Hoover, Virgil-Hillhurst, Vermont, Normandie, and Western,

Major corridor in Los Feliz are Los Feliz and Riverside.

Add: The unsolved bottleneck for transportation is because the Santa Monicas choke major public and private transportation to and from Coastal Los Angeles and Interior points.

Existing Transportation System: Delete “numerous” and replace “neighborhood” with “little-patronized and limited-operation” . Delete “A network of” and add “Little-used”, and add after “includes”: “a” and make “Pats” singular.

Project Characteristics: Delete “increases in”. Delete “transportation” before “infrastructure”. Delete sentence beginning “Mixed-use development”.

P2-3: Delete “removing and/or”. Replace “protect” with “continue” and replace all of sentence after “neighborhoods” with “if existing zoning coincides with as-built conditions.” After “district changes” add “for properties denied equal protection of law or inverse-condemnation conditions.” Delete following sentence.

Delete “not” before “potentially”, and replace “changes” with “a special privilege” after “initiate”. Replace “SCAG” with “Planning” and add after “area” “which is less than the Current-Plan capacity of 281,000“. Delete sentence beginning “These changes”.

Replace “by encouraging” with : “by allowing” and replace end of sentence after “development” with “only where it advances public safety and welfare”. Delete the following sentence.

Replace “increase housing” with “adjust” and add after “capacity” to increase public safety and welfare”.

**Table 2-1: Correct improper and unsubstantiated data therein, in accordance with accumulated data.**

Project goals:

1. Replace “additional” with “safer”, and end item after “transit”.

2. Delete "higher intensity".
4. Replace "existing" with "actual" and replace all after "densities" with "if not mono-zonal."
6. This one is nonsense. Delete.
9. Replace "preserve" with "recognize".
10. Replace "correct" with "update" and delete all after "PF".

P2-6: Delete paragraphs beginning "These goals" and ending before "Alternatives".

ALTERNATIVES: Replace "an" with "the" and replace end of sentence after "alternative" with "compared to several reasonable alternative programs.

Replace "consider" with "rate" before "the impacts".

Alternative #1 : Delete all after first sentence. The growth does not exceed the current Plan capacity, so if desired retain "Because the level" sentence only use "development changes" for "growth". Delete the last sentence unless proof and rating system is added to DEIR.

Alternative #2: First sentence may be untrue. At any rate, the "best" alternative may be different than the three, when planning is corrected for better performance. **Alternative obviously does accommodate the growth to 235,850. What was not analyzed in each alternative is growth of pass-through congestion, which can't be mitigated by this Plan alone.**

Alternative #3: **There is no such thing as a "SCAG Forecast". And, the SCAG number cited is smaller than the present Plan capacity. I see no tangible data regarding this alternative in this DEIR. No evaluation may therefore be accepted as reasonable for its comparison.**

Environmentally-Superior: **The "because" are nonsense. The two should be rated on better terms.**

**I believe the TIMP is severely-flawed and unexplained sufficiently to get a reasoned answer.** The Transportation analysis for the present Plan was flawed but better-reasoned, and inasmuch as it predicted about what is the case now, I trust it to be better-grounded.

What is necessary is to correct the monocultures in the "bedroom-areas" before expanding the ghetto in Hollywood to build energy-sucking high-rises. As a long-time planner of the Hollywood area, I know that this DEIR doesn't validate anything, and just listing extrapolated facts won't produce a reasoned choice.

**Table 2-2: Nothing supports or explains column "Land Use", Nothing qualifies "Mitigations" as achievable or environmentally-beneficial, Nothing quantifies LOS after Mitigation; but also the table doesn't compare alternatives item by item, only the one alternative is listed therein.**

In Summary, the Summary isn't convincing at all. Please review the former Hollywood EIR's to see how to construct an acceptable Summary.

**3.0 The Title should say "Update Description", or "Program" if it is truly that.**

**3.2 Table 4.2-3 estimates that retail jobs are dwarfed (1/6) by non-retail jobs (5/6) and falling (15%). And, zoning proposals in 4.1 "box and reduce" the available Industrial land in the Plan.**

**The third paragraph is an oxymoron; DEIR Section 4.1 rezoning does not permit Industrial jobs to increase, but allegedly "increases" housing.**

If the Revision is to "increase" population because the public transportation system allows them to go somewhere else, then reason directs the domiciles to be placed *somewhere else*, thereby improving density, transportation, air quality, noise, and safety.

If the Revision wants more in-Plan jobs, then **Industrial land must be protected and increase.**

DEIR overlooked the garment industry, in which many residents work by commuting-away. There used to be large garment factories on Plan's Industrial land, especially on Santa Monica.

52-23  
Cont.

52-24

East Hollywood lobbied for SNAP to provide zoning therein for garment-work, and CM-like zoning in SNAP 5D was the result. However, to decrease internal truck traffic more CM locations near freeways would be environmentally-dictated, to permit jobs in walking-distance but isolate trucks bringing their materials and removing their products.

Media Industry jobs may be mis-counted due to Industry job-setups, but the Industry is the Plan's largest. Nothing in the DEIR explains why those in Media will desert their domiciles in Toluca Lake, Bel Air, Malibu, and Beverly Hills to live at Santa Monica and Seward. Nothing in the DEIR shows why those Moguls will ride myriad public transportation to make deals. DEIR must conclude the above.

The CRA Project Area Committee labored-long to ameliorate Hollywood traffic issues. West Hollywood prohibited "best practice" modification for Santa Monica. Construction sabotaged rebuilding Highland from Sunset to Franklin. Los Angeles Planning's error at Highland and Fountain stymied improvement of Fountain. New routes through the Santa Monicas were thwarted. Years of deliberations finally delivered no relief. So, there can be no trust that paragraph 4 is a reasonable promise for traffic relief.

Nothing in this Plan is necessary to accommodate Historic Cultural Monuments; other regulations adequately-control. City cannot force restrictions unrelated to safety and public welfare on owners without paying for the "inverse condemnation".

#### Trends

Table 3-1: Out of date. SCAG possesses 2010 data which DEIR lacks. There is issue about where SCAG gets data; DEIR Definitions avers data came from City. It is unethical to disguise a source.

Data as presented proves 2010 projections from 1988 exceed listed 2030 projections. The "existing plan capacities" are grossly erroneous.

#### Land Use Strategy

There is no "strategy" listed. Strategy should tell how Hollywood will recover from (1) its demise, with attention to the land-bust the area recently is undergoing, (2) the Plan's deficient infrastructure, and (3) City's economic malaise curtailing services.

#### Regional Vision

There is no connection shown to this Plan. I believe it is unnecessary to include this point.

#### Greenhouse gas

Remove here because it is unnecessary.

3.3 Existing Land Uses: Delete "and entertainment" after "tourist". Tourist encompasses entertainment, and listing separately has a different connotation which is unwarranted.

(Note: Western Avenue was the west boundary of Los Angeles when Hollywood was a separate city, so East Hollywood can't claim Western runs "through" it.)

Delete stat on where sf uses are located. More sf houses are located in flats than in hills; their land was just up-zoned without actual structural change (verified by physical count).

Add after "compass points." : Streets in the hills are generally too narrow for modern dimensional-standards.

See comments per 2.0, above for items repeated in 3.3.

3.4 Shouldn't the last-listed Objective be the most important, and listed first?

4.1 Paragraph 3 omits reference to zone changes and variances which ensued after 1988 and changed the Plan thereby. Were those case-by-case changes factored-in? The DEIR should answer the query.

Table 4.1-1: Is inaccurate; also may be updated if corrections requested amend stats.

Residential Land Use: Mostly-influenced by rezoning to corral low-income residents into flats and away

52-24  
Cont.

52-25

from hills and Westside. Important to set this into paragraph 1.

**Characterizing percent of use by acres is grossly-misleading. FAR and zoning makes acres immaterial. Likewise, the percentages are inconsequential to public safety and welfare. Some percentages are not truly mathematical: Reducing an area by fifty percent means something, but saying an area of 1 % is reduced to an area of 0.5% hides the impact of the reduction and is unethical.**

**Please re-write all of the Land-use descriptions to show pertinence instead of acreage. Gross Product is more-important than the acreage on which it derives, for example.**

**Impact Assessment:**

1. This statement has no bearing on environmental issue. It is purely-administrative.
2. The impact would not necessarily be felt on the environmental restraints.
3. This is not a criterion but a possible result perhaps not environmentally-sensitive.
4. This is also not a criterion.

**Instead of the above irrelevances or irrelevant truisms, restate. One environmental effect is caused by spot re-zoning which defies Section 65906, thereby trashing the Plan unlawfully but demoralizing good planning as a result. It makes people work less-hard on Plans which won't be obeyed regardless of merit.**

**The environmental significance is the Impact to be the threshold of significance in a DEIR.**

**Assessment: This section's shortcoming is that it fails to set up issues of legal significance, the facts associated with each issue, the choice of decision, and the reason the facts dictate the decision chosen.**

**Instead, it is essentially just a statement of censored facts and bare choices. It does not comply with the mandate of Section 1094.5 CCP, *Topanga*, and *Philip Anaya*. That is not to say that appropriate curing will invalidate the assessment's conclusion.**

52-25  
Cont.

**However, some of the statements are invalid factually and damage faith that the conclusions can be believed.**

**Also, "environmental character" is only in the eye of the beholder; others may disagree. *Broadway, Laguna v Board*, 66 C 2d noted at 776 that "contemplated design [is not of legal significance in the Code]".**

**Failure to let the property owner use owner's imagination robs the City of fresh ideology. Planning shouldn't substitute its own limited development ideas for those of its millions of creative people.**

**For example, the Eiffel Tower was called a monstrosity needing destruction when initially-built. B&S demanded that Watts Towers must be demolished. Both survived, because other opinions ruled.**

**Proposed Land Use Changes**

**There is an amount of *hubris* in the ten points which shouldn't be included. The Plan is not perfect, though the points indicate it is after changes listed. The statements following thereafter appear to "prove" its superiority by merely listing acreage again. The listings prove nothing.**

**General Plan Consistency**

**The Plan Revision is inconsistent. It fails parks consistency. It fails transportation consistency. It fails equal-protection consistency. It fails safety-consistency. This list is not all-encompassing.**

**The closest DEIR comes to admitting failure-of-consistency is to say, "Some of the land use \* \* \* to be made consistent", implying the Plan does not conform and is thus unlawful and in contempt of the Court settlement.**

**Zone Height District: The Northridge Quake was "pointed at" raw land between Los Angeles and Santa Clarita. Nonetheless, it "exposed" the location of the major fault which lies beneath Hollywood as it cuts across from Los Feliz and Griffith Park to and beyond Bronson and Carlton. Tall slender buildings are especially-vulnerable to catastrophic destruction near this fault. Modeling shows certain building heights are to be avoided. *Alquist-Priolo* holds the City liable if it fails to warn properties and inhabitants.**

Federal law holds failures to perform such services by government employees to be criminal acts regardless of lack of intent.

The environmental effect of height districts is of major importance in Hollywood and for City personnel.

### Land Use Changes:

Subarea    Comment ( Number incorporates comment in Part A )

A6    Increases restriction and bestows privilege. See 8.

A9-2    Requires SNAP amendment and EIR. See A6 comment *supra*.

A13-3C    Reduces restriction and bestows privilege. See 8.

A23-4B    See A6 *supra*.

Planning prior disregarded actual development and only considered zoning. The above changes impact by analogy at least 2,000 other parcels and perhaps 5-figures' worth. It requires more justification than extant.

B9-3    No change discernable from DEIR. Requires more explanation of change. See 8.

B23-4A    See A6 *supra*.

These parcels lose value and change must be predicated on safety or welfare, which seems improbable.

C3-2B    See B9-3 *supra*.

C3-2F    See B9-3 *supra*.

C3-2G    See B9-3, but office commercial is not a use allowed in R zone.

C3-3    See B9-3, *supra*.

C4-7    See A6, *supra*.

C9-1    See A9-2, B9-3 *supra*

C25-3    See B9-3, *supra*.

C41    See A6, *supra*.

The Impact statement does not set forth a legally-valid excuse for overturning what was asserted was legally-valid before. It is mere assertion changes have no environmental impact.

D13-1I    See A13-3C, *supra*.

D13-1J    Change requires more explanation. See A6, A13-3C, *supra*.

D13-1K    See D13-1K, *supra*.

Restrictions in zoning must not be arbitrary, but must be required to maintain safety and welfare. These parcels may be community concerns, but the uses certainly don't affect safety nor welfare, although relocating may increase travel for repairs and thus abuse the environment. **Take care regarding re-zoning which appears to abuse rights and degrade environment, just for cosmetic improvement. The listed impact defiles the stated purpose of the Revision: to get services closer to residences.**

E7A    SNAP already is enforceable without assistance from this Plan. Implied incorrect assertion is that SNAP does not supersede the Plan. (The 1988 EIR in footnote stated that 1988 Plan was merely advisory; SNAP specifically states SNAP is the law.)

E10-1D    See E7A, *supra*. **Note that SNAP specifically-prohibits C-2 and legislative history made clear that is its intent. SNAP permits industrial uses additionally.** See 5.

E18-4    This invades a MR-1 street and jeopardizes industrial growth. Housing must be prohibited to maintain security and welfare; the proposed change degrades the environment.

E18-5    This jeopardizes MR-1 properties adjacent. Rezoning beyond change to CM not indicated for environmental protection of primary Hollywood industry.

E19-A    See A13-3C, *supra*.

E19-2    Part of an existing industrial use. Change requires more explanation. Perhaps can justify CM but not more. See 8.

E19-2A    See E19-2, *supra*. Existing CM may validate the three E19 parcels by present and historic use.

E31-1A    See E10-1D, *supra*.

E31-4    See E10-1D, *supra*. SNAP prohibits use above C-4.

E42-3    Change requires more explanation.

52-25  
Cont.

- E42-4** Zone consistency requires C-4. See E42-3.  
 These affect more than nomenclature and do have environmental impact not admitted in the Impact text.
- F4-8A** The zone proposed still will not make the use approved. Section 65906 requires *explicit permission* of use. CR may be the only explicit "R" zoning category permitting "hotels", except for its outdated isolation requirement (A (d) ).
- F4-8 B** Code permits use of one parcel adjacent to commercial use for parking. See E42-3.
- F4-8C** See F4-8A. See A6, *supra*.
- F13-5A** See A6 and A13-3C *supra*.
- F13-5B** See A6, *supra*.
- F13.5C** See E42-3, *supra*.
- F13-6A** See E42-3, *supra*.
- F42-1A** See A6. This will impact substantially. The island of C-2 is required per the Plan Goal. Because the parcels are not adequately described, the changes' true environmental impacts remain **hidden**. However, it appears that the Revision's goals are contravened. The result is **environmental degradation according to the Revision's goal-statement**. The actual loss-percentage of the change is also **hidden**. See associated comment about percentages in 4.1, hereinbefore.
- G2-1** See E42-3, *supra*.
- G3-1** See E42-3, *supra*.
- G4-5D** Important to preserve CM. See A13-3C, *supra*.
- G5** **Extreme quake-danger zone**. Retain HD1 and apply Alquist-Priolo protective process. Discourage large residential population, for safety and welfare.
- G5-2 & 3** **Quake danger zone**. Reduce FAR and residential density. See G5, *supra*.
- G5-3A & 3B** See G5, G5-2, *supra*.
- G5-4** If change, use CM and 1.5 FAR. See comment in 3.2 regarding small-industrial needs.
- G6-1** "Mixed-use, no residential" requires explanation. **Extreme quake danger zone**. See G5-2, *supra*.
- G6-2** Change would remove competition and reduce availability of auto service, needed in the vicinity. See A6, *supra*. **Quake danger zone**. See G5-2 *supra*.
- G6-3** See G6-2, *supra*.  
 These would **substantially-impair the City's treasury due to seismic activity, unless Alquist process is undertaken**. Impact will be extreme and not just in the Hollywood area.
- H17-3** "Restricted" zoning improperly called "Limited", which caption is assigned to entirely different zone. Use is drastically-limited solely to retain Industry. Proposed change will **destroy Plan's industrial base by creating huge arbitrage-situation**.
- H39-3** State preemption invaded part of land zoned solely for Industry. Regardless, Industry needs remaining land preserved per Code Purpose, namely for Industry. See 5.
- H39-4** Commercial invasion is welcomed by arbitrageurs but threatens Hollywood industrial capacity and thus its continuance. **If commercial use will be permitted** (present uses were due to lapses in City sensibilities) on industrial sites, **compensating sites must be granted within the adjacency of the MR-1 tract**. See A13-3C, *supra*. See 5.
- H40-2A** Invades MR zone area. **Zone change must only be to MR-1 for safety and welfare**. See 5.
- H40-2B** See H40-2A.
- H40-4B** See H40-2A. **Only "MR" will "preserve" industrial sites and prohibit profiteers from destroying Hollywood's main source of jobs**.
- The Revision's proposed zone changes would substantially-degrade the entire Hollywood environment because industry would flee**. The impact statement ignored the exodus-issue. It also ignored the extreme valuation-difference between restricting land for industrial use and permitting other uses.
- I40-2E** MR is *not* "limited". That appellation applies only to ordinary land which may actually be used for commercial and residential purposes. "Limited" primarily refers to motor horsepower and the power of earth-shaking or noise-making appliances in buildings.

52-25  
 Cont.

“Restricted” pertains to prohibitions on *uses* which otherwise would destroy Industry.

There can be no “Medium residential” and “MR1-1” designations on any land; they are mutually-exclusive. A “Q” would be impertinent.

**I40 Zone & Height District Changes:** These lands need further identification. See also 8 regarding special privileges. A change to M-1 from MR-1 would be drastic and not preserving the integrity of the area designated for industrial purposes.

**Result of “approximately 217.8 acres” changed to M1 “limited manufacturing” will be ecological disaster for the entire City as “Hollywood” takes its extreme profits and departs.**

**J4-1 and 24** Open space has no need for FAR above 0.5, because it is intended to be open. Anything higher is contrary to the goals alleged by the Revision and not environmentally correct. Declining “PF” zoning implies the parks are not to be permanent.

**Impact is substantial because the Plan deliberately ignores the park requirements set forth in the City’s Master Plan since time immemorial. More-important than rezoning bits to provide owners with unconstitutional special-privileges is the urgent necessity to plan for eventual location of parks required to deliver public safety and welfare as now commanded by the Framework.**

**Failure to provide the City’s inhabitants with services promised in the framework is designated as “fraud” by Section 1346 of Title 18, United States Code. This criminal offense by public servants is actively-prosecuted by the Attorney General.**

**K1-4 & 1-4A** FAR 3 is unreasonable. Amend to 0.5.

**K11-1** SNAP controls, and with FAR 1.5.

**K14.1 & 14.2** City should not set PF FAR larger than private FAR of same use. Leave at FAR 1.5.

**K20 & 20A** Reduce FAR to 1.5 to match surrounding commercial FAR. Property no longer residential.

**K21 thru K34** See K20 , *supra*.

DEIR sets forth no legally-pertinent impact-assessment for these changes.

**East Hollywood is entitled to substantial relief also, but by ignoring East Hollywood’s lack of relief the DEIR does not fully-address environmental issues in the Plan area.**

## MITIGATION MEASURES

1. Nothing in the DEIR proves that the Proposed plan actually mitigates anything or will be implemented. **To the contrary, experience with SNAP policies, etc over the 10-year period of existence brought absolutely none of them into reality. Their intentional snugging suggests that, unless the Mayor will exert the Charter authority and responsibility it returned to the Mayor from the Council, CDs will continue to act as independently of Code policies as they wish.**

2. Nothing in SNAP, a Specific Plan, deters the CDs from acting with impunity now. Why will the development standards in this Plan fare better than the development standards enacted in great detail in SNAP?

3. SNAP is advertised as a TOD by Planning, although its title is “Neighborhood Area Plan”. How will **“implementation where appropriate”** reduce neighborhood angst if neighborhoods believe they are powerless to control developments pushed by CD offices despite laws and regulations?

I add:

4: Who will have the gumption to take charge in Hollywood, without fear of later reaction to that person’s plans for that person’s property-developments?

5. What source of funding will materialize to enable any of the policies to be enforced?

To 4 & 5: **No one has come forth yet since the time of Dorothy Chandler. That was over 50 years ago.**

## Unavoidable significant adverse impacts

DEIR statement of “less than significant impact” relies on “implementation of the above mitigation measures”, **implying the Revision generates significant adverse impacts but without their identification. I see nothing**

52-25  
Cont.

52-26



**mitigating predicted seismic catastrophes in the Plan and DEIR. I see nothing mitigating youth unemployment in the DEIR. I see nothing mitigating job losses in the DEIR. I see nothing mitigating traffic jams on main thoroughfares in the DEIR. I see no funding sources to implement policies in the DEIR. So, impacts stay unavoidable but larger because of the Revision.**

52-26  
cont.

#### **4.2 Populations, Employment and Housing**

**This Revision was long in the making; perhaps with Planning's employment-turnover the delay was the result of the "learning curve for new workers", but 2005 is not the "current time" any more. It is almost time for 2012. Statistics for Hollywood for "current 2010" are available.**

52-27  
cont.

**Since 2005, there was a major setback to jobs, construction, population, and the City Budget. The basis for all of 4.2 was invalidated by events which 4.3 failed to predict. Thus its predictions for future years fail credibility.**

**It appears that the predictions for 2010 contained in the 1988 EIR may not be reached nor exceeded in 2030, except perhaps for through-traffic.**

**DEIR does not assess through-traffic as the major environmental issue it obviously remains. It could be that if other industrial and commercial centers may be permitted to establish themselves in the various mono-residential City areas, through-traffic will ease. But that option was not made a part of the DEIR and environmental effect on Hollywood remains wishful thinking.**

52-28

**But if Hollywood density is over 3 times other Plans, even though smaller in area, then it would follow that other- Plan amendments are more-urgent to correct.**

#### **4.3 Public Services**

**Fire protection: After severe cuts in firefighters and administration and civilian personnel, the Department mothballed apparatus and adopted a reduction in operating scheme. The "existing condition in DEIR no longer is true. The Chief said the amended Departmental scheme is permanent regardless of recovery.**

**People are arguing over the RIF's effect on the environment, but those arguments are not in the DEIR where they should be.**

52-29

**The pertinent tables therein are invalid and conclusions cannot be drawn from them.**

**What is new and pertinent are enormous fees for Fire Dept services. Fees may dissuade developers. Non-payment may cause current services to cease because of funding shortages.**

**These conditions affect the environment and omission invalidates EIR conclusions.**

**Mitigation measures: Nowhere does the Plan mitigate the City's serious Budget shortages. Nowhere does it prove how its mitigation measures can be realized successfully now or in the future.**

**Police protection: Los Angeles claims its PD is under-staffed compared to any other large City. Its relatively-low crime rate is due to the designs of its Planning areas. Segregation played a positive but heinous role.**

**As the Budget Crisis deepens, police eventually will face sworn layoffs, just as they already lost civilian employees. That future will find Planning and B&S unable to process development and oversight requests.**

**So, Planning's ability to operate or mitigate the Revised Plan may be thwarted because the Police Department exerted its apparent authority to consume almost the entire City Budget .**

**This situation is not addressed in the DEIR, but it must be or else environmental damage is improperly assessed.**

**Mitigation: The principal mitigation, "Hire and deploy additional officers", is unrealistic. "Upgrading" also is**

a non-starter. State and Federal funding is being cut down. HR 1 threatens considerably-more cuts in existing Federal and State aid. Additional police facilities are impossible. TIMP won't reduce crimes which drive visitors away and reduce City income to finance Dept. Budgets.

**Libraries:** Recent public approval of increasing the Charter set-aside for libraries reduces the portion of the Budget available for other Departments such as Fire, Police, Planning, and B&S. Budget short-falls due to increased library funding rights will adversely impact the safety and welfare of Hollywood visitors due to impaired responses by City departments.

**Parks:** Previously-addressed regarding lack of required local and community parks.

The Regional parks are affected strongly by the new requirement for them to pay for infrastructure from their budget allotments. They are also affected strongly by budget and manpower cutbacks. Fee raises will have another environmental effect on Hollywood inhabitants, possibly cutting visits to businesses also.

Volunteers supporting park operations may cut back their contributions due to hard times.

None of this is assessed in the DEIR.

Mitigation won't be possible if funding dries-up, priority may cause most Hollywood parks to close, LAUSD also has shortages and may not allow use of their properties, and monitoring manpower for merely identifying more than that 112 parks are required and not delivered in Hollywood.

**Schools:** The publicized 20 percent drop in County children forecasts a surplus of schools and their employees. "Critical overcrowding" may be followed by "weedy, abandoned parcels".

According to Table 4.3-11, salvation means converting multi-family units into single-family units. While that won't happen, it signals that the reservoir of single-family housing is keeping schools open, despite promoting segregation. This situation needs environmental attention.

**Water & Power:** Before lots of lawns in the Valley it was unbearably-hot. Evaporation from grass cooled it off.

With a drive to eliminate lawns, water must be evaporated by air-conditioning instead. Air conditioners brought Legionnaires' Disease to the City. And, air conditioning consumes great quantities of power, substantially produced by the City from coal which is polluting the world.

Maybe the environmental answer is to plant more grass and trees, and stop air-conditioning, but high-rise construction can't survive without air-conditioning and the power it requires.

Norris Poulson, before serving as Mayor was in Congress and was instrumental in getting the Colorado River Compact for the City's fall-back water supply. But now the City's Owens supply increasingly must be "dumped" to wet the Owens Valley dust, replaceable only by untapped recycling.

**Wind:** The City is blessed with abundant sea breezes, tempering the climate. Barriers block breezes. So, blocking sea breezes is an environmental issue for Hollywood, and it is ignored in DEIR.

**Solid Waste Conversion:** Germany has waste-to-energy facilities set beside housing with no deleterious environmental effect. Los Angeles needs similar sites, not concentrated in low-income areas. Mr Smith of CD15 has led to advance SWIRP but he is leaving.

There is no place in the Revised Plan for SWIRP although it is ready for pilots. The waste Hollywood generates mandates siting plants therein. Substantial environmental hazards including life-threatening diseases and accidents caused by excessive transportation of wastes should be assessed in DEIR.

**4.5 Transportation:** A parking lane shouldn't be considered a "traffic lane". Listed streets should have lanes listed without including lanes temporarily widened or narrowed. Businesses depend on parking lanes for customer parking, so temporary taking for movement or other purpose is a degradation to the environment.

Transportation effects on the environment are discussed hereinabove throughout the Statement and will not be

52-29  
cont.

52-30

repeated here. However, because the TAZ model was amended, comparison with 1988 and CRA studies would have needed re-computation to afford realistic validation with contemporary values. There is no showing that such was done (The KAKU work was “secret” but thoroughly-analyzed at the time to find a way to cut D, E, and F intersections).

**Selected Highway Segments:** Delete “seldom” after “roadways” and replace “but” with “as” before “they”.

A forgotten environmental factor is that people use streets for non-transportation uses as well as for non-auto/truck transportation.

**Existing Link Levels:** Kaku report was derived from on-the-scene counts, but the TIMP apparently is a mere “calculation” as written here. **Clarify if actually-counted, and what year counted.** Traffic after 2006 is distorted from prior by the dive in activity, jobs and visitors.

While DOT does employ many implanted vehicle counters it is not fair to extrapolate from pre-crash 2005. Moreover, using V/C calculations from arterial streets to predict future vehicle movement is risky if the assumption is that people in large numbers will in the future use public transportation instead of private vehicles.

First, if the public transportation involves long waits for rides, there is a strong reason not to use it. **I have been able to walk the two miles from Hollywood & Vine to Santa Monica and arrive near La Brea without seeing a single bus in the direction I walked.** Of course, the result is never to opt for public transportation.

Second, if an artery is crowded every engineer knows traffic will move onto “secret routes” avoiding delays, but **public transportation cannot.** Thus only the tourists will be “stuck in slow traffic”, and their **delay may cost them one or more attractions.**

Third, the transportation plan depends on activity in surrounding Plans and Cities. While not belittling DOT’s TIMP, because of excluded variables and Planning’s perhaps-unrealizable idea of **reducing jobs and putting wage-earners on public transit I believe the result amounts to GIGO.**

Even with partial variables and controversial Plan, the LOS figures are **too high to encourage much development if it is the only selling-point.** Why not develop where land and demolition costs less, transportation is equal or better, zoning is more-amenable? Did Mr Caruso choose Hollywood? Mr Anschutz? Why not may be the pertinent question for this DEIR.

**Further Recommendations:** There is no prospect to fund the recommendations listed. If funds were found they would be used for a higher-priority program, like restoring the Fire Dept.

**Air Quality:** Connected to pollution is dispersal. Wind movement is affected by building masses and heights and proximities. DEIR failed to examine zoning restrictions for pollution enhancement, dispersal and direction characteristics, but only emissions. Emission data may be highly speculative and inconclusive.

#### **4.8 Geology and Soils**

##### **The City Risks Future Viability on Account of Hollywood’s Geology**

Reports, including the Federal SEIS/SEIR for the Metro Rail Red Line, the Southern California Earthquake Center, the California Institute of Technology’s Divisions of Geology and Civil Engineering, and other Experts, agree that **Hollywood is situated upon a fault considered “active” and capable of destroying it in the near future.**

Figure 4.8-1 is one of several fault maps the City has proffered. **It suffers by not revealing the true length of the system, said in 1995 to be more than 130 miles long and evidencing a more than 17-mile left-lateral strike-slip movement in 6.5 million years (averaged 14-foot movement per thousand years ).**

Enclosed is an amended Figure 4.8-1 showing its fault through Hollywood connected as prescribed to form the 130-mile Raymond-Hollywood-Santa Monica-Malibu Coast-Santa Cruz Island-Santa Rosa Island Fault.

52-30  
cont.

52-31

Active trenching and boring in Hollywood for the Red Line SEIR/SEIS revealed traces of the Hollywood Fault, and damage from the Northridge Quake indicated the approximate location of the Santa Monica Fault.

An estimate of the seismic potential of both faults was reported as greater than 7.0 if the western half of the system breaks, with a displacement larger than six feet, every 1800 years. Because quake intervals seem to be about 4000 years the potential may exceed 7.3, or as others predict, above 7.2. At this intensity, the City building code protection for buildings is ineffective. For example, a seism originating in Parkfield about 175 miles away, will cause an 18-story modern steel structure in Canoga Park to bend in half and collapse if the seism's magnitude in Parkfield is only 7.8.

If the Santa Monica Fault system breaks its entire known length, the seism may equal or exceed a magnitude of 7.6. Probable damage will exceed \$100 billion as experts calculated in 1990 dollars.

The fault zone is delineated by map issued by the State from data supplied it presumably by the City. **The flaw in State maps arises if the City does not apprise the State that an active fault exists within it.** When the United States in Red Line SEIS defined faults in Hollywood as "active", the City vigorously-objcted: "On page 3-47 of \* \* \* draft SEIS, the statement is \* \* \* Hollywood Fault is considered active." The Federal Response: "Notwithstanding the State Geologist's classification, consultants for the Metro Rail Project consider the Hollywood Fault to be active," The "active" determination was final.

Maps of general and specific locations of "dangerous" known faults (from SEIS) are enclosed. The main Hollywood trace is near Franklin Ave east of Franklin's western terminus, and the Yucca trace follows Yucca St. The Santa Monica Trace runs diagonally, crossing Franklin near Vermont, Vine near Fountain, and Fairfax near Melrose. Its zone is very wide because the structure is *en echelon*.

My experience in reinforcing buildings for better seismic performance proves **there is no protection for any Hollywood construction near these fault traces regarding their expected seisms.**

Section 2621.8 requires the City to warn fault-zone property owners of restrictions and prohibitions on buildings constructed in a fault zone considered "active", or face liability for earthquake-related injuries or deaths caused by City's failure. **Requirement to warn being germane for Hollywood, it should be in the Plan and issue should be subjected to environmental analysis.**

Building heights and configurations in seismic zones must allow the Fire and Police Depts to rescue inhabitants.

**Threshold of Significance:** It's erroneous to dismiss per 1 (a) only a fault rupture. Northridge for example was hidden, did not break surface in the City, and was not recorded per State map prior to the quake. Currently by the criterion of 1 (a), the City is not protecting present and proposed inhabitants of the Plan's areas of seismic danger. City approves new construction therein which City apparatus cannot reach for rescue purposes.

**Assessment:** Compliance with Building Code will not reduce safety hazard in the area to minimal level. Only extraordinary rules within the Plan framework will improve but not guarantee hazard of death and injury from expected levels of seismic destruction. Protection from shaking in the near-zone is a budgetary impossibility.

**Adverse impacts for both inhabitants and for the rest of the City on account of liability for negligence are so great as to prevent the Plan from a reasonable enactment.**

## 5.0 Alternatives

**Because the facts relied-upon by this DEIR are incorrect as shown hereinbefore, there is no credence to be attached by this DEIR Section until the facts are corrected.**

**Scoring must be quantitative not qualitative as aspresent.**

## 6,0 Other CEQA Considerations

**A major consideration not assessed is the most important: Quality of life. If quality is missing, the environment is inappropriate.**

Nothing in the Plan encourages creative answers to Hollywood life. Planning is more than merely writing generalities and hoping someone more-creative will think up better solutions to living conditions.

52-33  
Cont.

**The material statements in this Section advance nothing but allude to vast issues with no cures set forth. Planning requires solutions and the Department is supposed to create good ones.**

**Intentions are not solutions, and “address topics” does not mean “bring up unanswered issues”.**

## CONCLUSION

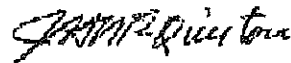
After review, I believe the DEIR is just a work early in progress and needs substantial revision before it will satisfy the CEQA requirements for a comprehensive review and clearly show causes and their effects.

52-34

Until that work is more-complete, this DEIR cannot be published as “Final”.

I believe the comments herein were submitted with respect and that they will be helpful and pertinent.

Respectfully submitted,



c: Interested parties

J. H. McQuiston, P.E.  
Resident and affected Property Owner

See FEIR Appendix for attachments to this letter.

52-26

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\_\_\_\_\_  
\_\_\_\_\_

May 27, 2011

RECEIVED  
CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENTAL

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

On the west side of the first block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost Circle, which is inside a hillside residential neighborhood.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,



1842 Outpost Dr.  
Los Angeles  
CA 90068

May 27, 2011

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CITY OF LOS ANGELES

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Sincerely,

  
\_\_\_\_\_  
PINTOFF

PINTOFF

Lynne Pirtle (formerly Bierdz)  
1835 OUTPOST DR  
LA, CA 90068

May 27, 2011

RECEIVED  
CITY OF LOS ANGELES

JUN 03 2011

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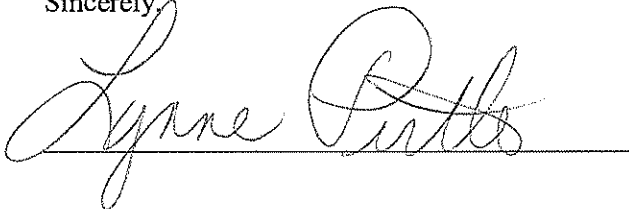
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Sincerely,





**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE HOLLYWOOD COMMUNITY UPDATE**

**Submitted by:**

**Richard H. Platkin  
6400 W. 5<sup>th</sup> Street  
Los Angeles, CA 90048-4710  
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E-mail: rhplatkin@yahoo.com**

1) The DEIR does not present a credible planning rationale for the Plan's 105 pages of up-planning and up-zoning based on the "growth neutrality" intent of the General Plan Framework Element. The city of Los Angeles, according to the General Plan Framework, has enormous untapped potential for population and housing expansion based on adopted plan designations and zones when the Framework was prepared in the mid-1990s. To exceed local densities in Hollywood, you must therefore have a clear rationale based on documented increases in population growth and housing demand which have outstripped locally permitted densities. In the case of this Plan there is no analysis of the remaining buildout potential for the privately zoned parcels in the Plan area, nor any demonstration that it is not capable of meeting the future needs for housing and employment in the Plan area.

56-1

56-2

2) The process of updating this community plan is based on outdated data. California State planning laws and guidelines requires General Plans, including their land use elements (i.e., the Hollywood Community Plan) to be current and internally consistent among its required and optional elements. In this case the General Plan Framework Element is based on 1990 census data which was extended to the Plan's 2010 horizon year. The update of the Hollywood Community Plan, which is supposed to flesh out the Framework at the local level, is, however, based on year 2000 data, augmented by 2005 estimate, and then extended to the year 2030. The two plans are not only inconsistent with each other, but neither is current because the new 2010 census data is now available and should be used for all plan reviews and updates.

56-3

3) If 2010 census data had been used for the DEIR, it would demonstrate that Hollywood had a serious population decline from 2000 to 2010 of about 15,000 people , on top of a totally static population from 1990-2000. This

56-4

means that DEIR's population projections, obtained from the Department of City Planning and from the Southern California Association of Governments are highly inflated, inaccurate, and therefore not acceptable for the DEIR.

56-4  
cont.

4) To be updated correctly, the General Plan Framework Element should be totally revised based on new demographic and infrastructure data. Once this process is completed, only then should the 35 local community plans, including Hollywood, be updated. But, at this point, to implement an outdated General Plan at the local level, much less with different base and horizon year, defies both common sense and State of California planning guidelines.

56-5

5) In fact, in the Hollywood Community Plan's implementation program of up-zoning and up-planning is being proposing to encourage growth to meet secondary Framework goals, such as transit use. This is an approach which turn LA's growth neutral General Plan Framework Element on its head and conflicts with Charter Sections 556 and 558, which require consistency with the intent and purposes of the General Plan. The role of transit is to serve the public's growing need for mobility, but calls to increase density in Hollywood as a planning tool to increase transit use absolutely conflict with the intent and purposes of the General Plan.

56-6

6) As far as we know, the city's infrastructure, which has not been monitored in over 11 years, and in some categories not planned in over 40 years, cannot handle existing user demand, much less the demands of the larger population which might result from the extensive up-planning and up-zoning of Hollywood. Without demonstrated unused infrastructure capacity, there should be no increases in permitted density according to the General Plan Framework. Furthermore, there does not appear to be any proposal in the DEIR or the draft plan text to monitor local infrastructure conditions, including changing demographics and user demand, as well as the effectiveness of the updated Plan's policies and programs.

56-7

City of Los Angeles  
Department of City Planning  
c/o Srimal Hewawitharana  
cc Kevin Keller  
cc Mary Richardson

Re; The Hollywood Community Plan Update EIR

Dear Mr. Hewawitharana;

Please consider the following as my comments for the Hollywood Community Plan Update EIR.

In 2010 I proposed a lot split for my property at 8875 Thrasher Ave. in the Hollywood Hills to the Los Angeles Department of City Planning. This application, Case No: ENV-2009-642-EAF, was denied mainly because of the Slope Density Ordinance.

The following is information and a scenario of what has transpired.

I first made my application in the middle of November, 2008. The people who accepted my application in the beginning of my process, Mary Richardson, the Hollywood Community Planner and Jennafer Monterrosa, the city Case Manager and Planning Assistant both informed me that my property complies with all the necessary codes including Slope Density in order to obtain a lot split as long as each parcel was a minimum of 40,000 square ft. The property is 87,451 square feet and in the application each parcel was designed and proposed to be a minimum of 40,000 square feet.

All departments approved and recommended the lot split.

Mark Worshing's Staff report stated that the slope density formula did not apply and recommended approval.

Garland Chang, the head of the board stated he is inclined to grant this in the first hearing but gave the opposition out of courtesy and politics an extension.

The grading department alone took approximately a year requiring civil engineers, surveys, geological engineers, boring samples, soils reports, architects and biological surveys, arborists and many other related fields in order to attain approval.

I spent approximately \$20,000 in fees and \$30,000 in professional services totaling over \$50,000 for a mere lot split.

The whole process was approximately a 20 month process.

At the second hearing my application was suddenly denied because of the Slope Density Rule. Despite my property having a size of 87,451 square feet, the Slope Density ruling reduces my zoning from a Very Low II to the minimum of .5-1 dwelling per acre but also reduces it to a one dwelling per lot. This is very confusing and also I feel an incorrect application of the ruling.

I am in a RE-15 zoning and surrounded by properties that are 15,000 sq. ft. or less mostly less as low as 7,000 square feet that are 5 feet apart from each other and consume almost 90% of their lots. I am also limited to 40% lot coverage and a one retaining wall ordinance with a height limitation that reduces any proposed structure on my lot to almost a 35 feet width. With a lot this big, I'll have a huge portion of the lot that will be unused. I am only looking for only two lots in an area where according to size I should be allowed 6 lots. My property is the largest lot in the area.

The Slope Density ruling is purely aesthetics. It has nothing to do with engineering since I have soil that is exposed bedrock and provides a very stable supportive structure for any building as described in my approved soils reports by my geological engineer Geo-concepts.

This application also conforms to the Subdivision Map Act which also allows waivers not to imply that I need a waiver since the act alone allows for a lot split. .

This ruling seems to be applied according to the situation, politics or per case basis rather than according to the law and grossly unfair to me.

In addition this property was part of an 11 acre parcel made up of two parcels, one 2 acres and one 9 acres which was not allowed to be split apart due to a covenant in the deed until 2004 when the City of Los Angeles created a waiver to divide it in two without applying the slope density ordinance which is when I purchased the 2 acre parcel. Again at that time the City of Los Angeles allowed a lot separation without application of the Slope Density rule. That act voided the application of this rule and therefore should not be applied to my application. They adjusted the lot line without any considerations to slope density making one larger than the other. This means they can make these lots any size without application of the slope density ruling. What if one did not conform with the adjustment. Shouldn't this have been taken into consideration before the ruling. The point is it was not and therefore it should not be considered in my request for a lot split.

This application has been treated in a very unfair manner and I would respectfully request that your office assist in my dilemma.

I would like to request that possibly the language in the new Hollywood Plan can be revised to help people like myself with very large parcels. This is not a safety or engineering issue since the land is in a very stable area nor is it a zoning issue since I have plenty of land for not only 2 parcels but 6 parcels. Please advise on whether your department can solve my predicament.

Thank you for your time.

Jay Pirincci  
301 174<sup>th</sup> St.  
Apt. 914  
Sunny Isles Beach, Fl. 33160  
917-922-5460



## DHCP/DEIR: Request Update on Schedule for Response to Comments/Staff Report/Workshop/PH

2 messages

Richard Spicer <spicerrichard@yahoo.com>

Tue, May 31, 2011 at 1:27 PM

To: Mary Richardson <mary.richardson@lacity.org>, Srimal.Hewawitharana@lacity.org, kevin.keller@lacity.org

Cc: masi@ggpnc.org, garyk@ggpnc.org, Ron Ostrow <RonOstrow@ggpnc.org>, jkomberg@ggpnc.org

Good Afternoon,

1. Congratulations on completion of 90 day Public Comment Period (in two days) & the Presentations/Q&As to groups!
2. a. Given your engagements with a range of stakeholder organizations and the public written comments received, including those from the GGPNC. what is the schedule for response to comments on the DEIR and the staff report regarding comments on the DEIR?

b. The Planning, Zoning, and Historic Preservation Committee of the Greater Griffith Park Neighborhood Council has its monthly meeting on **June 8th, Wednesday, 7 pm.**, at which there will be an update on the DHCP/DEIR public comment period and the proposed schedule for the above items in the Subject line.

About how many organizations and individuals made written comments during the 90 days?

- c. Will the written responses to comments on the DEIR and the staff report on the comments on the DHCP be available to the public **prior** to the the workshop, **on line** and a few copies **in print**?
- d. Will the Planning Department hold a public hearing as part of the workshop or a separate date, time, and location?

3. This e-mail is also a request to confirm that each of you received from the GGPNC President, Ron Ostrow, (a) a cover letter, dated May 17, 2011, (b) with the written report on the public comments made at the Forum on March 30, 2011, (c) all the previous letters and comments/recommendations on the DHCP/DEIR, (d) the link to the recording of the audio of the Workshop, and the (e) links to GGPNC web location of the letters/comments/recommendations.

Thanks for considering the above questions.

Best for the next phases on the DHCP and DEIR.

Richard Spicer  
Member, GGPNC's PZHP Committee  
(323a0 665-6080)



Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

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## DHCP/DEIR: Request Update on Schedule for Response to Comments/Staff Report/Workshop/PH

2 messages

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Tue, May 31, 2011 at 1:27 PM

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Richard Spicer  
Member, GGPNC's PZHP Committee  
(323a0 665-6080)

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JUN 03 2011

ENVIRONMENTAL

Claire Turkel

1903 Outpost Drive

LOS ANGELES, CA 90068

May 27, 2011

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

Dear Mr. Hewawitharna:

I am a resident on the first block of Outpost Drive between Franklin Avenue and Hillside Avenue. The first block of Outpost Drive is a low density, single family, hillside neighborhood with historic Spanish-style homes and parkway sidewalks. It is surrounded on three sides by commercial properties.

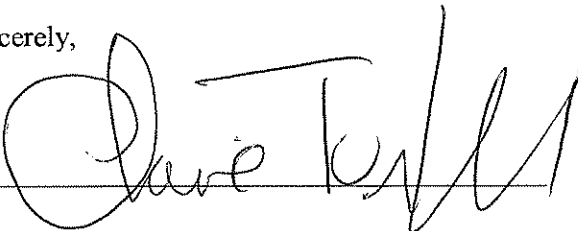
On the west side of the first block of Outpost Drive are a series of low to mid-rise apartment buildings. These buildings overlook the backyards of the homes on Outpost Drive.

On the east side of the first block of Outpost Drive is the Highland Gardens Hotel, which includes a two-story main building and a separate smaller one-story building in back. Both Hotel buildings overlook the backyards of the homes on Outpost Drive. The front entrance of the Hotel is on Franklin Avenue (7047 Franklin Avenue), but the Hotel also has a back driveway off of Outpost Circle, which is inside a hillside residential neighborhood.

The expansion of the commercial properties on either side of the first block of Outpost Drive would have serious negative impacts on the homes on Outpost Drive, including loss of privacy, loss of views, hotel and car noise, late night noise, trespassing, crime, illegal parking, automobile traffic and foot traffic. These negative impacts would hurt the quality of life and property values on the first block.

Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

Sincerely,



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CITY OF LOS ANGELES

JUN 01 2011

ENVIRONMENTAL  
DIVISION

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\_\_\_\_\_  
May 27, 2011

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Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

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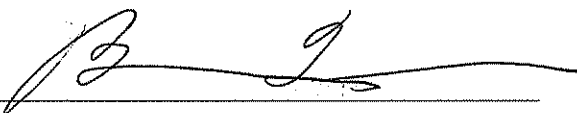
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Sincerely,

  
\_\_\_\_\_



Letter 61

**Nicholas S. West  
1836 Outpost Drive  
Los Angeles, CA 90068**

May 27, 2011

**RECEIVED  
CITY OF LOS ANGELES**

**JUN 03 2011**

**ENVIRONMENTAL  
DIVISION**

Mr. Srimal Hewawitharana  
Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan

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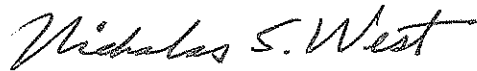
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Please include provisions in the new Hollywood Community Plan that would prevent the commercial properties on either side of the first block of Outpost Drive from increasing their size, height, density, or commercial use. These provisions are necessary to protect and preserve a low density hillside residential neighborhood from the potential negative impacts of the commercial properties that surround the neighborhood on three sides.

**The above comments are particularly relevant to our house at 1836 Outpost Drive, which is the fifth house up from Franklin Avenue on the east side of Outpost Drive. Our house is located in the shadow of the rear building of the Highland Gardens Hotel. The Hotel building is on higher ground than our house, which increases its height above our house. In addition, the back driveway and parking area of the Hotel are immediately behind our house. My wife and I and our neighbors on the east side of Outpost Drive are extremely worried about the future of the Hotel, as well as the back driveway and the parking area. We urgently request a meeting with you to discuss this situation. Please contact me at your earliest convenience so that we can set up a meeting. My cell phone is: (626) 390 2591; and my email address is: [nsw.locus@gmail.com](mailto:nsw.locus@gmail.com)**

Sincerely,



Nicholas S. West  
Resident  
1836 Outpost Drive



---

## Public Comment: Hollywood Community Plan

3 messages

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karen zimmerman <zimzip@ca.rr.com>

Wed, Jun 1, 2011 at 4:49 PM

To: Srimal.Hewawitharana@lacity.org

As a member of the Sunland-Tujunga Neighborhood Council Land Use Committee I have great concerns about the densification elements in the Hollywood Community Plan update.

Since the 1980s the City of Los Angeles has erroneously based planning decisions using population projections that did not pan out. The City has defaulted on new statistics. In addition, the City has failed for over ten years to do the annual assessment that is required.

62-1

In fact the 2000 census numbers used in the HCP are out of date. The most recent census information is available and must be used if the plan is to be considered legitimate. Failing to take those more current numbers into account raises questions about DEIR.

Projecting housing needs based on inflated projections has pushed our city headlong into over development of multi-unit projects. And many of these exceed the size and scope of the neighborhoods in which they are built.

The City has a responsibility to compare the numbers used in the DEIR with the recent census.

In addition, there is a major conflict in the HCP's up-zoning. It conflicts with elements of the City's General Plan, in which consistency is critical.

Our own community plan is to be revisited in the near future. Allowing an inadequate DEIR for the HCP sets an inaccurate precedent for our own.

We ask you to rethink the HCP DEIR in light of the newer census information. To do otherwise is an injustice not only to the residents of Hollywood, but to all Angelenos.

Thank you,

Karen Zimmerman

Tom Zimmerman

Karen Keehne Zimmerman

V.O.i.C.E.

STNC Land Use Committee

SaveTheGolfCourse.Org

---

**Srimal Hewawitharana** <[srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)>  
To: karen zimmerman <[zimzip@ca.rr.com](mailto:zimzip@ca.rr.com)>

Thu, Jun 2, 2011 at 8:44 AM

Dear Ms. Zimmerman,

Thank you for your comments on the Hollywood Community Plan Draft EIR. We will be responding to all comments received during the review period, in the Final EIR.

Sincerely,

Srimal P. Hewawitharana  
Environmental Specialist II

[Quoted text hidden]

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**Srimal Hewawitharana** <[srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)>  
To: Mary Richardson <[mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)>, Kevin Keller <[kevin.keller@lacity.org](mailto:kevin.keller@lacity.org)>, Wendy Lockwood <[wl@sinusenvironmental.com](mailto:wl@sinusenvironmental.com)>

Thu, Jun 2, 2011 at 8:44 AM

[Quoted text hidden]

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## Change of Deignation

1 message

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Gordon Hessler <goh@msn.com>

Fri, May 27, 2011 at 11:05 AM

To: Mary.Richardson@lacity.org

Cc: Don Andres <Andres2007@sbcglobal.net>

Dear Ms. Richardson,

I support the proposed "Change of designation" proposal for North Gardner Street (from Hollywood Blvd to Franklin Avenue) and Franklin Avenue (from Gardner Street to La Brea Avenue) to be strictly residential and not a collector secondary highway for through traffic. This would be a positive step in helping to ease a part of the crisis we are facing from an out of control Runyon canyon park which is causing an unbearable strain on the residents. The park is an ecological nightmare and a disgrace to the city.

63-1

Sincerely,

Gordon Hessler



# Hollywood Community Plan - DEIR - Case #:EIR - 2005-5158

1 message

Carol Sidlow <csidlow0264@aim.com>

Tue, May 31, 2011 at 12:53 PM

To: srimal.hewaitharana@lacity.org

Cc: mary.richardson@lacity.org, kevin.keller@lacity.org, shawn.bayliss@lacity.org, Anastasia@comiche.com

In reviewing the Hollywood Community Plan's DEIR, I would like to make the following comments regarding the DEIR:

## Schools - Page 4.3-28

64-1

It is my understanding that Wonderland Elementary school currently has approximately over 500 students, between the "Home School" and the Magnet. It is my understanding that many of the students who attend are driven into this hillside area on a daily basis, representing a significant impact on the traffic patterns of a school located in a High Fire Severity Zone. It may be the only LAUSD Elementary school in the Hollywood Community Plan which is located in a City designated HFSZ and Landslide area unfortunately, without adequate parking or mitigations for parking.

## Page 4.5-9 - Signalized Intersections and Traffic Control Devices

64-2

"currently, the whole signal system in Hollywood is online with the ATSAC system"

Is this correct? Is Laurel Canyon Boulevard on the ATSAC system? I had heard that it was not. If not, shouldn't it be?

Thank you for taking the time to review these comments.



## Urgent Request Re: Draft Hollywood Community Plan

2 messages

Nadia Conners <nadia@treemedia.com>

Wed, May 25, 2011 at 12:53 PM

To: Mary.Richardson@lacity.org, kevin.keller@lacity.org, srial.hewawitharana@lacity.org

Cc: PRESIDENT@hhwnc.org, vicepresident@hhwnc.org, dneilson@dnaepr.com, jeanne.min@lacity.org, Don Andres <andres2007@sbcglobal.net>

May 25, 2011

Dear City Planners,

I am a new Mother and I am a new homeowner in the area designated as Franklin/ Hollywood Blvd. West. We have lived here six months. Since we have moved in we have been utterly horrified by the reckless driving in this neighborhood. There is a blatant disregard for the stop signs at the corner of Franklin and Gardner as well as other stop signs. Cars simply sail through at high speeds. These are cars using Franklin as an alternate route to Hollywood boulevard during rush hours for about four hours in the morning and four hours in the evening.

This is an urgent plea to designate Franklin Avenue West of La Brea through to Sierra Bonita as a residential road and not, as you have planned to list it, as an alternate collector roadway. Not only is your current designation a dangerous idea it is a terribly destructive one as well. We are a group of about 125 residents in the homes north of Hollywood boulevard, West of La Brea and East of Sierra Bonita who are struggling to build a safe community in an historic neighborhood with its architecturally significant homes. Yet we seem to be fighting to create a community in the midst of a major road way. It is not merely that this is a busy street. It has some of the most aggressive and dangerous driving I have seen in this city. Obviously these are frustrated drivers coming off long commutes and hoping this short cut will buy them a few seconds. **It is just a few blocks that they gain but a neighborhood that we lose.** I would understand designating Franklin as a collector route if it was a through street but it is not – it comes to a natural terminus at Sierra Bonita. In fact this whole little community is almost a natural cul-de-sac were it not for these drivers cutting though it at top speeds and ignoring all stop signs. I could easily send you a video recording of car after car speeding through the signs. My garage is directly on the corner of Gardner and Franklin and I have many times been almost run off the road as I try to make my way into our garage. **This is an accident waiting to happen.** I have written my Councilmember Tom LaBonge about this issue months ago.

Please hear this urgent plea. I would like to request that you grant us full residential street status – whatever that official term may be. I see an easy solution in the future of redirecting traffic heading west at La Brea. Every block on Franklin west of La Brea has a stop sign already. For traffic heading East there should be greatly reduced light time at Gardner and be speed humps placed up and down Gardner, Sierra Bonita, and Franklin.

Please help us save this small neighborhood and protect our children. The President of our Homeowners Association Don Andres has already written you a note. Please accept this letter as a show of additional

6/1/2011

City of Los Angeles Mail - Urgent Requ...

65-1  
cont.

support for his request. I'm am circulating my letter to other mothers in our area so that they may sign on as well.

Sincerely,  
Nadia Conners  
7475 Franklin Avenue  
Los Angeles

---

Kevin Keller <[kevin.keller@lacity.org](mailto:kevin.keller@lacity.org)>  
To: [mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)

Wed, May 25, 2011 at 3:24 PM

Let's research this tomorrow and send out a polite response to stave off any misunderstanding. I don't think we are upgrading the street. We are modifying to keep the same, right?

See you tomorrow- lots of emails regarding the plan.

---

**From:** Nadia Conners <[nadia@treemedia.com](mailto:nadia@treemedia.com)>  
**To:** [Mary.Richardson@lacity.org](mailto:Mary.Richardson@lacity.org) <[Mary.Richardson@lacity.org](mailto:Mary.Richardson@lacity.org)>; [kevin.keller@lacity.org](mailto:kevin.keller@lacity.org) <[kevin.keller@lacity.org](mailto:kevin.keller@lacity.org)>; [srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org) <[srimal.hewawitharana@lacity.org](mailto:srimal.hewawitharana@lacity.org)>  
**Cc:** [PRESIDENT@HHWNC.ORG](mailto:PRESIDENT@HHWNC.ORG) <[PRESIDENT@HHWNC.ORG](mailto:PRESIDENT@HHWNC.ORG)>; [vicepresident@hhwnc.org](mailto:vicepresident@hhwnc.org) <[vicepresident@hhwnc.org](mailto:vicepresident@hhwnc.org)>; [dnelson@dnaepr.com](mailto:dnelson@dnaepr.com) <[dnelson@dnaepr.com](mailto:dnelson@dnaepr.com)>; [jeanne.min@lacity.org](mailto:jeanne.min@lacity.org) <[jeanne.min@lacity.org](mailto:jeanne.min@lacity.org)>; Don Andres <[andres2007@sbcglobal.net](mailto:andres2007@sbcglobal.net)>  
**Sent:** Wed May 25 12:53:42 2011  
**Subject:** Urgent Request Re: Draft Hollywood Community Plan

[Quoted text hidden]





Letter 66

ALLEN W. HUBSCH  
(310) 785-4741  
allen.hubsch@hoganlovells.com

Hogan Lovells US LLP  
1999 Avenue of the Stars  
Suite 1400  
Los Angeles, CA 90067  
T +1 310 785 4741  
F +1 310 785 4601  
www.hoganlovells.com

May 16, 2011

VIA E-MAIL AND OVERNIGHT DELIVERY

Mary Richardson  
Department of City Planning, Mail Stop: 395  
City of Los Angeles  
200 North Spring Street  
Los Angeles, California 90012  
E-mail: [mary.richardson@lacity.org](mailto:mary.richardson@lacity.org)

Re: Hollywood Community Plan

Ladies and Gentlemen:

Thank you for this opportunity to comment on the Draft Hollywood Community Plan.

I am a member of the Land Use Coalition of Public Counsel's Early Care and Education Law Project. Public Counsel is the nation's largest pro bono law firm. One of the missions of the Land Use Coalition is to engage planning agencies in collaborative efforts to improve the child care infrastructure in Los Angeles County.

The Office of Child Care of the Chief Executive Office of Los Angeles County periodically conducts comprehensive child care needs assessments within the County of Los Angeles. The 2006 needs assessment for the community of Hollywood Monte shows a very substantial shortfall of childcare services in all three reported categories: infant childcare, pre-school childcare and school age (i.e., after-school) childcare. See attached spreadsheet and the website of the Office of Childcare, County of Los Angeles, <http://gismap.co.la.ca.us/childcare>.

Childcare is not only extremely important to working families, it is important to the communities in which they live and work. In January 2008, the County of Los Angeles partnered with several other agencies to author "The Economic Impact of the Early Care Education Industry in Los Angeles County". <http://ceo.lacounty.gov/ccp/pdf/LA%20Economic%20Impact%20Report-Jan08.pdf>. I have included a copy of this report about the importance of childcare to our communities, and I urge you to review it.

66-1

Mary Richardson, City of Los Angeles  
May 16, 2011  
Page 2

66-1  
cont.

In December 2007, the County of Los Angeles Child Care Planning Committee adopted a strategic plan entitled "Forging the Future: The Strategic Plan for Child Care and Development for Los Angeles County". <http://ceo.lacounty.gov/ccp/pdf/Strategic%20Plan1-%20Web-final.pdf>. The Planning Committee serves as the local child care planning council for Los Angeles County as mandated by AB 2141; Chapter 1187, Statutes of 1991. One of the pertinent objectives adopted by the Planning Committee in the Strategic Plan are:

"Continue working to reduce barriers due to zoning regulations and expensive permit requirements in cities throughout the County";

Unfortunately, a word search of the Land Use Plan reveals almost no use of the terms "childcare," "day care," "after school care" or similar words. I would suggest some small, but very important, revisions to the General Plan Public Review Draft March 2011. See the handwritten comments and Insert "A" which are attached to this letter.

I would welcome the opportunity to discuss further with you in person or by telephone.

Yours truly,



Allen V. Hubsch

cc: Karla Pleitéz, Esq., Public Counsel (via e-mail, w/encl.)

See FEIR Appendix for attachments to this letter.

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CALIFORNIA

EAST HOLLYWOOD  
NEIGHBORHOOD COUNCIL

EAST HOLLYWOOD  
NEIGHBORHOOD COUNCIL

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May 31, 2011

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ENVIRONMENTAL

Srimal Hewawitharana, Environmental Review Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012-4801

**RE: Hollywood Community Plan Update *Draft Environmental Impact Report*  
ENV-2005-2158-EIR; State Clearinghouse No. 2002041009**

The Hollywood Community Plan Update's *Draft Environmental Impact Report* ("DEIR") fails to adequately assess the correlation between proximity to a freeway and acute physical and mental disabilities within the human population, especially among children. While the DEIR does reference the standards of review for determining air quality health risks as devised by both the California Air Resources Board ("CARB") and the Southern California Air Quality Management District ("SCAQMD"), it avoids any discussion of the primary recommendation of these agencies that densification adjacent to freeways and high-traffic roadways be discouraged.

On this and other topics, the Hollywood Community Plan's DEIR avoids its fundamental purpose under the California Environmental Quality Act, which is to provide public agencies and the public in general with adequate information about the effect that a proposed project is likely to have on the environment, and to "identify ways that environmental damage can be avoided or significantly reduced." (Cal. Code of Regulations, Title 14, §15002(a)(2). The EIR's "purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus the EIR 'protects not only the environment but also informed self-government.'" Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.

Densification near freeways is a significant, long-term safety impact, yet the DEIR ignores its obligation to properly review this risk. Chapter 4.6 of the DEIR, "Air Quality," acknowledges on page 4.6-5 that the SCAQMD identifies "retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities" as sensitive receptors of heightened vulnerability. The DEIR at page 4.6-22 also references the CARB's 2005 recommendation that such sensitive land uses should be located where they "keep children and other vulnerable populations out of harm's way with respect to sources of air pollution and TACs. Sources of particular concern include freeways and high-traffic roadways..." Yet the DEIR only once mentions that the 101 Freeway "runs through the Hollywood CPA," stating: "If receptors are sited within close proximity to the freeway, impacts would be potentially significant." The DEIR then briefly references City policy that projects in proximity to freeways be conditioned to contain air filtration systems and inoperable windows. Passive mitigation from dense foliage is also suggested to reduce health risks from airborne toxic particulate contaminants.

Cars and trucks release over forty different toxic air contaminants, including diesel particulate, benzene, formaldehyde, 1,3-butadiene and acetaldehyde. Levels of these pollutants are generally concentrated within 1,500 feet of freeways and very busy roadways. As explained in two landmark USC studies published in 2004 and 2007 in the *New England Journal Of Medicine*, "fine particulate matter is ubiquitous...and readily penetrates indoors." The USC studies focused on the deleterious health effects of freeway diesel exhaust and road dust particulate exposure, finding that "routine exposure to dirty air during childhood harms lung development, leading to a permanently reduced ability to breathe." The USC studies concluded that children living within 500 yards of a freeway had on average a lifelong 9% decrease in lung capacity. Air filtration, inoperable windows, and foliage are therefore ineffective in mitigating these overwhelming and pernicious health risks.

67-1  
cont.

Furthermore, in a study published last December and reported widely by the media, researchers from the USC Keck School of Medicine and Children's Hospital Los Angeles announced that children born to mothers who live within 1,000 feet of a freeway have twice the risk of autism. This risk was consistent even when researchers controlled for several other factors that may affect prenatal development.

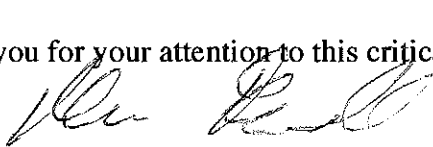
For residents of East Hollywood, such risks are not theoretical. Many children not only live next to freeways, they are also forced to attend schools for their entire K-12 education next to freeways, such as Grant Elementary, Le Conte Middle School, and Helen Bernstein High. For these youths, the only recreational facility within walking distance is Lemon Grove Park, which is also immediately adjacent to the 101 Freeway.

The DEIR ignores the cumulative impacts of such exposure on the health of residents of the Plan Area. Instead, the DEIR supports further densification of areas located within close proximity to the 101 Freeway. These subareas include matrix numbers 5:0, 5:1 and 43:1 west of the 101 Freeway, and subareas 23:4, 25:3, 26:1, 26:2, 28:0 and 45:0 east of the freeway. These neighborhoods, which are relatively far from a Metro Red Line station, include some of the most densely populated census tracts in the United States. These subareas also include Reporting Districts with the highest violent crime rates in Hollywood, with a disproportionate share of homicides.

The Board of the East Hollywood Neighborhood Council voted unanimously at its February 28, 2011 meeting in opposition to the Community Plan's proposed increases in allowable density near freeways. Further densification of such areas is, in our experience, simply untenable. Instead, the East Hollywood Neighborhood Council voted to support the only mitigation conceivable for property within 1,500 feet of a freeway, which is to downzone those areas to RD2 or RD1.5-1XL to discourage further development.

For years, members of this neighborhood council has repeatedly asked Staff at the Community Planning Bureau to seriously consider the wealth of scientific data showing that densification near freeways is dangerous. Our requests have unfortunately been completely ignored. We therefore respectfully request that the City Planning Commission and City Council consider what is best for the people of Los Angeles, and reject the Hollywood Community Plan Update's *Environmental Impact Report*.

Thank you for your attention to this critical matter.



David Bell, President, East Hollywood Neighborhood Council  
Doug Haines, Chair, Planning Entitlement Review Committee

# To the Los Angeles City Planning Dept.: We demand that the [Q] Condition be kept in the new Hollywood Community Plan.

68-1

Enacted by our City leaders in 1990, the [Q] Condition has preserved historic neighborhoods by restricting high-density development in Hollywood.

We demand that the restrictions of the [Q] condition be retained in the new Hollywood Community Plan and that **sub-areas 9:1, 9:2, 23:4, 23:4A and 25:3 be down-zoned to low/medium residential (RD1.5-1XL, FAR 3:1).**

Sub-area 9:1 is located south of Hollywood Blvd. between Western & Serrano; sub-area 25:3 is Serrano Ave. between Sunset Blvd. and Fountain Ave.; and sub-areas 23:4 & 23:4A are located south of Fountain between Western and Serrano.

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Angela Jones 1310 N. Serrano Av. 90027

Byron Contreras 1310 1/4 Serrano Av. 90027

**Our neighborhoods already suffer from too much residential density!**

**To the Los Angeles City Planning Dept.:  
We demand that the [Q] Condition be kept in  
the new Hollywood Community Plan.**

68-1  
cont.

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Name:                      Address:

CAITLYN MONTGOMERY                      5418 1/2 HAROLD WAY / LOS ANGELES, CA 90027

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MICHAEL DODGE                      5416 1/4 HAROLD WAY LA CA 90027

Darby Mastan                      Harold Way LA 90027

JOSE MORALES                      Los Angeles Harold. WY 90027

**Our neighborhoods already suffer from too much residential density!**

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## 3.0 RESPONSES TO COMMENTS

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Los Angeles Planning Department) to evaluate comments on environmental issues received from public agencies and interested parties who review the Draft EIR and prepare written responses. This Chapter provides written responses to all comments received on the Draft EIR.

A number of comments make common claims, so rather than respond to each comment individually this Final EIR presents three Master Responses (MR), which are:

MR-1. Population Changes and Projections

MR-2. Infrastructure

MR-3. Opinions and General Support or Opposition to the Project

In Chapter 2 comment letters and specific comments are given specific numbers for reference purposes. This Chapter presents complete responses, numbered to correspond to each specific comment letter and number identified in Chapter 2. In Chapter 4, Corrections and Additions, changes are made to the Draft EIR text in response to comments from this Chapter 3, or as initiated by staff, show changes to the Draft EIR. In general, where text of the Draft EIR is excerpted the text is indented and/or shown in italics or quotes. Changes to the Draft EIR text are shown in ‘underlined text’ for additions and ‘~~text strikeouts~~’ for deletions.

### **Master Responses**

#### ***MR-1. Current Population and Population Projections***

Several commenters have expressed concern that the Hollywood Community Plan Update proposes an increase in housing capacity exceeding the amount needed to accommodate future population. Commenters state that recently released 2010 US Census data shows that Hollywood’s population has declined, the vacancy rate has increased, and the Plan already has enough capacity to meet future housing demand. Also commenters have indicated that use of 2005 projected data is now outdated and 2010 census data should have been used.

Several commenters also indicate concern that the Hollywood Community Plan Update is inconsistent with the General Plan Framework because the time horizons of the two plans are different from each other, stating that the General Plan Framework is “growth neutral” while the Hollywood Community Plan is “growth inducing”. Comments claim that growth-inducing effects are not discussed in the Draft EIR.

#### **I. The 2005 Population Baseline Estimate**

The recent release of 2010 Census data has raised questions about the accuracy of the Draft EIR’s 2005 baseline population estimate for Hollywood. According to the 2010 Census there were 198,228 persons living in the Hollywood Community Plan Area in 2010. The baseline 2005 population estimate used in the Hollywood Community Plan Update was 224,426 persons.

The California Environmental Quality Act (CEQA) indicates that an EIR should normally examine the impact of the proposed project (the Hollywood Community Plan Update) on *physical conditions that existed at the time the notice of preparation was published*, which in this case was April 28,

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2005. Because the year 2005 falls between the decennial census years of 2000 and 2010, no physical count of Hollywood's population is available for the baseline year. Since no actual population count exists for 2005, the Draft EIR uses an estimate.

Estimates of the population of Hollywood in 2005 are available from several sources. Each source has limitations. The U.S. Census Bureau conducts an annual survey called the American Community Survey (ACS) that is based on a sample of 2.5% of all households in the City. In Los Angeles, the ACS surveys 24 Public Use Microdata Areas (PUMAs). The boundaries of the 24 PUMAs do not align exactly with the boundaries of the 35 community plan areas, and the sample sizes of the PUMAs are too small to yield population estimates that have an acceptable margin of error. More information on the American Community Survey can be found at <http://www.census.gov>.

The population estimate of 224,426 people presented in the Draft EIR was taken from the 2004 Regional Transportation Plan produced by the Southern California Association of Governments (SCAG), the metropolitan planning organization (MPO) of six of the ten counties in Southern California. SCAG is responsible for developing demographic projections for use in preparing various regional plans mandated by federal and state law.

At the regional level SCAG demographic projections are based on the major factors of population dynamics: fertility, mortality, and migration rates. Migration rates are adjusted to reflect economic trends, using labor force participation rates and unemployment rates, etc. At the local level, population projections are based on trends in occupied housing units and average household size. The effect of local policymaking, such as General Plan updates, and the mandates of federal and state plans are also taken into consideration. More detail on SCAG's forecast methodology can be obtained at <http://www.scag.ca>.

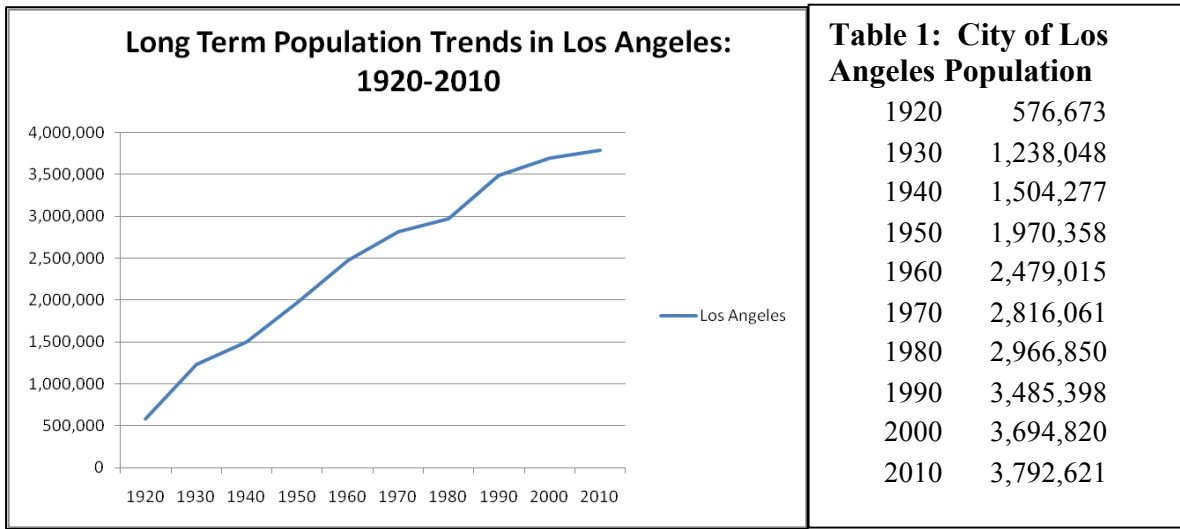
## II. Analysis of 2010 Census Data for Hollywood

It is too soon to determine whether slower growth in the 1990s and 2000s marks the beginning of a long-term trend or is a temporary pattern. The City of Los Angeles population increased by 97,801 persons between 2000 and 2010 (Chart 1, Table 1); however, the Hollywood population declined by 12,566 persons during this period (Chart 2, Table 2). There are at least four census tracts in central Hollywood that exhibited a net population gain. These tracts include census tracts 1905.1, 1905.20, 1907, and 1910; see Map 1. All four of these census tracts are located within the Community Redevelopment Agency Project Area and are areas where the Hollywood Community Plan is proposing increased capacity. As more variables of the 2010 Census become available, a more complete picture of the demographic shifts that contribute to population trends in Hollywood may be developed. For example, although overall the population of Hollywood declined between 2000 and 2011, the number of persons between the ages of 45 and 64 increased by 6,381, a 15.7% increase.

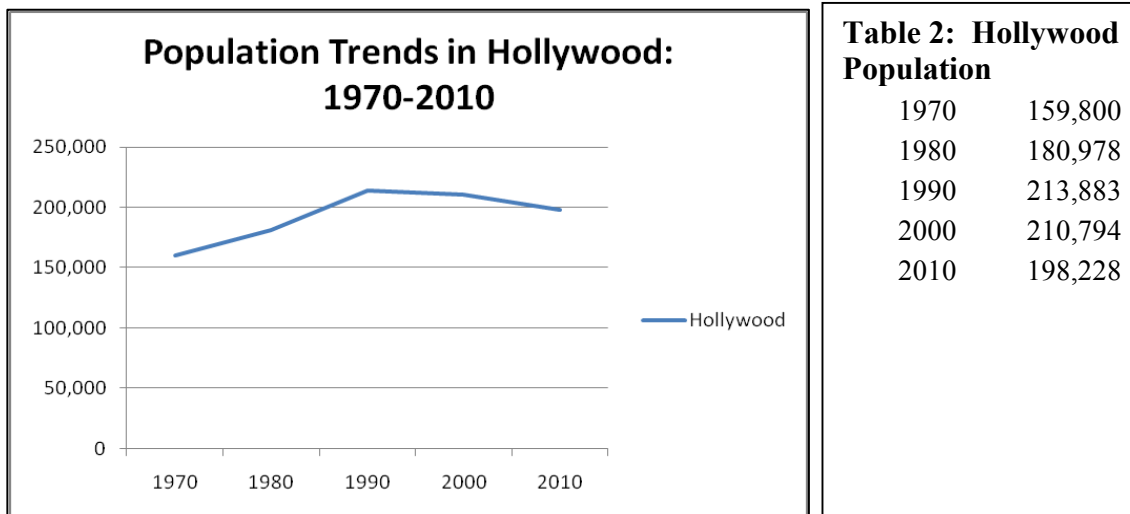
Given that the City of LA is still growing, that some census tracts and population groups in Hollywood are showing growth, there is reason to expect that net growth may return to Hollywood and that planning for this level of growth, if it were to occur, is desirable. Historically, Southern California has been a region of rapid growth (Table 1). Both the General Plan Framework and the Hollywood Community Plan aim to guide growth when and if it returns. The Proposed Plan is designed to accommodate a forecasted level of development through the year 2030. Development may happen at slower intervals or faster intervals over this period.



**Chart 1**

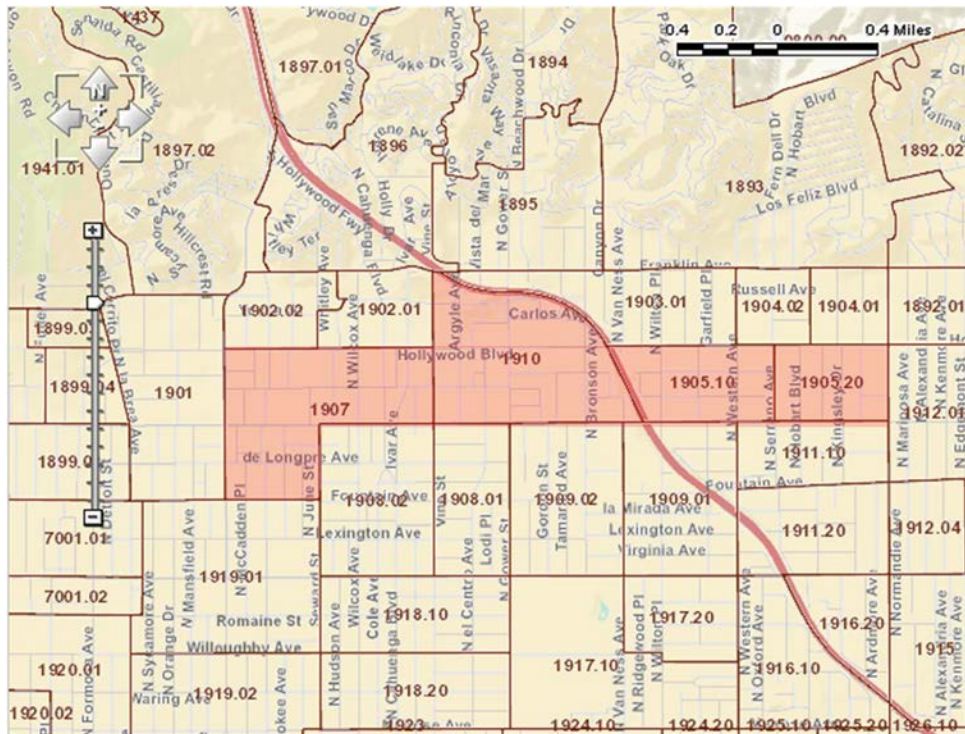


**Chart 2**



III. 2030 Population Forecast

The 2030 population forecast used by the Hollywood Community Plan Update was also taken from SCAG’s 2004 Regional Transportation Plan. The 2004 RTP was developed using baseline data from the 2000 Census. Commenters state that the Hollywood Community Plan Update should use the recently released 2010 Census data to provide a more accurate baseline count of population on which to produce a more accurate 2030 forecast – the proposed Hollywood Community Plan Update began in 2005 and all data for Existing Conditions were taken from SCAG estimates for that year.



**Map 1: Hollywood Census Tracts with Population Growth between 2000 and 2010**

The most current Regional Transportation Plan is RTP 2008, based on data from 2003. RTP 2012, based on 2008 data, is now in preparation and will be completed in mid-2012. After that, the next RTP will be RTP 2016. It is possible that RTP 2016 will use 2010 Census numbers, but it is more likely that RTP 2016 will use a baseline population estimate for 2011 or 2012 that is informed by the 2010 Census.

The cycles of RTP preparation do not regularly coincide with the release of Census data. The timing of RTP 2004 did allow for the use of the 2000 Census, but the release of census data with the initiation of an update of the RTP is not always synchronized. Because of the time involved in preparing the RTP, there is a lag between the times the census data is released or population estimate is prepared and the time that the RTP makes population estimates available. An additional lag occurs between the time the Planning Department receives SCAG's population estimates for the baseline and horizon year, and the time a draft community plan and EIR are completed.

The Planning Department is required by law to use SCAG's population numbers for the year that the Notice of Preparation was released for the EIR, which was 2005.

#### IV. Plan Capacity

Commenters note that the current Hollywood Community Plan already has capacity for approximately 235,850 persons and, since vacancy rates have gone up, increases in capacity are unnecessary. While current capacity and vacancy rates may be enough to accommodate the existing population in the near term, assuming that economic cycles return to a pattern of growth, these figures fall short of the capacity needed in the long term. SCAG's 2030 population forecast for Hollywood in 2030 is 244,602.

The Hollywood Community Plan seeks to increase commercial capacity as well as residential capacity. Commercial zoning in Hollywood in the Existing Plan is restricted by Development Limitations on Floor Area Ratio that were imposed in 1988 when the existing Plan was adopted. At that time Floor Area Ratios in Height District 1 in commercial zones citywide were lowered from 3:1 to 1.5:1. However, in Hollywood, Floor Area Ratios in several commercial land use designations have been further restricted to 1:1 and 0.5:1. Removing and/or adjusting these Development Limitations to allow more square feet of development is important for economic development in Hollywood.

Aside from accommodating future growth, there are other reasons for the targeted increase of capacity in Hollywood, such as focusing growth and conserving existing residential neighborhoods.

#### Focusing Growth

The Hollywood Community Plan proposes to redirect growth, strategically increasing capacity in certain areas in a manner that is consistent with the General Plan and achieves General Plan Framework goals. The General Plan Framework proposes that growth be directed to “targeted growth areas” located in proximity to major rail and bus transit corridors and stations. Objective 3.2 of the General Plan Framework aims for a spatial distribution of development that facilitates a reduction of vehicle trips.

The Hollywood Community Plan focuses growth around the Red Line Metro Rail and the Metro Rapid bus lines in conformance with the Framework Element. Focused growth and a mix of uses designed to reduce trips also conform to State and regional regulations and policies (including SCAG’s regional growth vision) that encourage infill development and high-density activity centers near transit to achieve the mandated clean air and greenhouse gas emission targets. Further detail on this growth strategy may be found in the Draft EIR’s Project Description.

#### Conserving Residential Neighborhoods

Another primary goal of both the General Plan Framework (Goal 3B and Goal 3C, Objective 3.7) and the Hollywood Community Plan (Goal LU.1) is the conservation of residential neighborhoods. According to the General Plan Framework, all areas outside of “targeted growth areas” are considered “conservation areas. New development in “conservation areas” should be comparable in type and scale with existing development.

The Hollywood Community Plan promotes mixed-use development in commercial zones, alleviating pressure to up-zone many residential areas and helping to preserve existing affordable housing and maintain existing neighborhood character.

In other words, the Hollywood Community Plan proposes to up-zone some commercial areas so as to minimize the need to up-zone residential areas. The first land use goal of the Hollywood Community Plan is to conserve viable neighborhoods, industrial districts, pedestrian-oriented districts, historic/cultural resources, and alleys. Increasing capacity outside of residential areas in commercial zones helps make it possible to conserve housing in existing residential neighborhoods at the existing price and scale.

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## V. Inducing Growth

Commenters have alleged that the Hollywood Community Plan is inconsistent with the General Plan Framework's principle of growth-neutrality because it provides capacity for 249,062 persons, 4,460 more than the 2030 SCAG Forecast. There are several reasons why the Proposed Plan Reasonable Expected Development (2030) exceeds the SCAG 2030 Forecast.

Excess capacity was included to give the Hollywood Community Plan a degree of flexibility to accommodate additional population, if necessary, to meet the requirements of the Sustainable Communities Strategy that is being prepared by SCAG as part of the 2008 RTP's response to Assembly Bill 32, the California Global Warming Solutions Act of 2006, and Senate Bill 375.<sup>1</sup> These legislative acts require that California cities lay out a vision for regional growth that considers the relationship of land use to transportation in reducing vehicle trips to achieve greenhouse gas emission reduction targets.

Because of significant transit infrastructure investment with the opening of the Red Line Metro Rail in 1996 and a large downtown area zoned for Regional Center commercial uses, Hollywood's land use pattern supports increased transit use. In acknowledgement that Hollywood is a prime location for added density, the 2008 RTP raises the population forecast for Hollywood to 249,062, from the previous forecast of 244,602 in the 2004 RTP.

As noted in Section 6.2 of the Draft EIR, since SCAG anticipates this level of growth in Hollywood, increases in capacity proposed by the Hollywood Community Plan Update are growth-accommodating rather than growth-inducing.

## VI. Growth Inducing Impacts and Consistency with the General Plan Framework

Commenters claim that the Hollywood Community Plan Update is growth-inducing and, therefore, not consistent with the General Plan Framework, which is growth-neutral. Commenters also note that the two Plans have different baseline and horizon years.

The Draft EIR contains thresholds of significance for determining whether or not the proposed Hollywood Community Plan Update would create growth-inducing impacts (see page 6-1). A project is considered to result in growth-inducing effects if it causes either the extension of infrastructure to an area currently undeveloped and/or lacking adequate infrastructure, or the provision of housing or employment to an area currently undeveloped or lacking in adequate housing or employment. Since Hollywood is an area where growth is anticipated and encouraged, due to the area's investment in transit infrastructure, the Draft EIR analysis finds that the proposed Hollywood Community Plan is growth-accommodating, not growth-inducing.

The General Plan Framework, which was adopted in 1996, is intended to offer "a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements". The General Plan Framework is not a required element of the General Plan and is not intended to cause population or employment growth to occur but, rather, to accommodate changes in population and employment that may occur in the future.

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<sup>1</sup> AB 32 requires California's Air Resources Board to adopt a statewide greenhouse gas emission limit for 2020, equivalent to statewide levels in 1990. SB 375, passed in 2008, provides a means for achieving AB 32 goals through regulation the emissions produced by cars and light trucks.

The Hollywood Community Plan is consistent with this framework for growth. Implementing zone changes and policy language in itself does not cause growth. It is the interaction of signals within the Plan and market forces, in addition to a host of other demographic, economic, political, and environmental factors that cause growth. The Hollywood Community Plan's vision of concentrating growth around commercial centers and corridors supported by transit infrastructure incorporates principles of the General Plan Framework. The General Plan Framework encourages compact development located close to transit infrastructure and activity centers.

The baseline year for the General Plan Framework is 1990, compared to 2005 for the Hollywood Community Plan Update. The horizon year for the General Plan Framework is not as far in to the future as the year 2030 for the Hollywood Community Plan Update. However, the Proposed Hollywood Plan area's current and projected populations for 2030 are within the range analyzed in the General Plan Framework. It is not necessary or reasonable for the baseline and horizon years of these two plans to coincide exactly because this would involve redoing the General Framework each time a community plan is adopted and there are 35 community plans in the City of Los Angeles. It is important that the Community Plans embody the principles contained in the General Plan Framework.

***MR-2. Infrastructure Capacity, Funding Improvements and Monitoring***

A number of comments address infrastructure capacity, the funding of improvements, and monitoring that may be required because of the proposed zone changes and increased density in the Hollywood Community Plan Area. As described in Sections 4.3 and 4.4 of the Draft EIR, Public services and utilities are delivered by a number of City departments and bureaus as well as non-City agencies and private companies (such as the Los Angeles Unified School District, Metro, SoCalGas).

The City of Los Angeles Fire Department provides fire protection services. The Los Angeles Police Department provides police protection services. The City of Los Angeles Public Library System provides library services. The Los Angeles City Department of Recreation and Parks manages city-owned parks. The Los Angeles Unified School District provides public elementary and secondary education to City residents.

The City of Los Angeles Department of Water and Power delivers water and electricity. SoCalGas provides natural gas. The City of Los Angeles Department of Public Works' Bureau of Sanitation coordinates wastewater collection and treatment, as well as disposal of solid waste. The transportation system is managed by the Department of Transportation, working in conjunction with Metro and the City of Los Angeles Department of Public Works' Bureau of Street Services and Bureau of Street Lighting.

Levels of public services and infrastructure capacity are determined by estimates of population, land use designations, zoning and reasonably expected development levels, existing infrastructure resources and other factors. As population and demand increases, infrastructure is updated and enhanced to keep pace with demand.

The Department of City Planning has always tracked growth and development activity. Approximately every four years, as part of the regional planning process, local planning departments (including the City of Los Angeles Department of City Planning -- DCP) work together with SCAG to develop population projections for the City of Los Angeles and the southern California region

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SCAG publishes regional transportation plans every four years and is currently working on the 2012 Regional Transportation Plan.

The Planning Department provides quarterly and annual data on building permit activity in the City of Los Angeles by community plan area (<http://cityplanning.lacity.org/DRU/HOMEDRU.cfm>). City departments access building permit data, population projections as well as U.S. Census data and other data pertinent to their department (for example most recent data on service and utility usage rates), to prepare public service and infrastructure plans.

Examples of City department plans which can be accessed on the City's website include: the 2009 Citywide Parks Needs Assessment Report, the 2010 Integrated Resources Plan, and the 2010 Urban Water Management Plan.

LADWP's energy resource planning is guided by an Integrated Resource Plan (IRP). The 2010 Power IRP is an energy resource planning document that is being used to determine the energy resources necessary to provide electricity to Los Angeles for the next 20 years.

The Department of Public Works Bureau of Sanitation has also prepared an Integrated Resources Plan to plan for future wastewater management in the City of Los Angeles through the year 2020. This IRP includes a Facilities Plan that will address the wastewater, recycled water and storm water related facilities and needs of the area for the year 2020.

The Department of Public Works Bureau of Sanitation has prepared a Solid Waste Integrated Resources Plan (SWIRP) for the City of Los Angeles. This plan will guide how the City will manage the solid resources generated in the City through the year 2025.

The Department of Public Works Bureau of Street Services provides services such as street tree maintenance, curb ramps to facilitate access, street and sidewalk maintenance, etc. The Bureau of Street Services depends on its Pavement Preservation Program to determine pavement condition, maintenance needs, and the optimal time for rehabilitation by predicting future pavement conditions. While the Bureau of Street Services has prepared a 10-year plan to improve the street network, it has adopted a "sustainability mode" until the right level of resurfacing funding is available.

The LAUSD has a Strategic Execution Plan (SEP) in place to guide new school constructions, repair and modernize existing facilities, and otherwise accommodate future educational development needs.

Upgraded information systems have expanded the ability of City departments to assess service and infrastructure needs, as well as track the provision of services and infrastructure. Computer technology enables City departments to consider a variety of factors in assessing the need for services and infrastructure.

One example of use of information systems is the method used by LAPD for determining police officer deployment across Hollywood. LAPD uses a computer model called Patrol Plan, which considers 25 different variables, such as forecast call rate, average service time, etc. The Police Department uses computer modeling to target personnel where and when they are most needed. Using Patrol Plan, LAPD has succeeded in reducing crime for nine years in a row.

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Similarly, under the new LAFD Deployment Plan the service delivery area of each fire station is drawn so that fire apparatus can reach any address in that district within a specified response time. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, LAFD can shift resources to meet local demands for fire protection, as needed.

Public use of services and infrastructure changes from year to year. Some infrastructure per-capita or per-dwelling unit usage levels have decreased in recent decades. For example increased use of water conservation measures, such as low-flush toilets, has resulted in a decrease in water use per capita over the last 30 years in Los Angeles.

The DCP and the service and utility departments continuously upgrade their systems which monitor changes in the utilization of services and infrastructure and continually undertake long-term planning to deliver budgeted public services and infrastructure. Each Department typically looks at least 20 years ahead to plan for improvement within its area of responsibility.

Metro's Long Range Transportation Plans prepare thirty-year projections for traffic patterns in the southern California region based on census data and travel surveys. Metro's Travel Demand Simulation Model evaluates how well the highway and transit systems function under existing conditions and a series of future year alternatives, looking at traffic volumes and speeds. This analysis is conducted to determine the effectiveness of alternative transportation strategies and assist in the development of program and project recommendations. The proposed Hollywood Community Plan Update includes a Transportation Improvement and Mitigation Program (TIMP) that also uses travel demand modeling to recommend traffic mitigation measures.

Infrastructure in the Hollywood Community Plan Area is not separate from the City as a whole. The City takes an integrated approach to addressing growing service demand. Programs such as LADWP's 2010 Urban Water Management Plan and the City's Integrated Resource Plan (IRP) call for water and energy efficiency as well as innovative strategies for water conservation and waste management. In addition, Demand Side Management (DSM), involving conservation policies and programs to reduce per-capita usage, increases the capacity of existing systems.

LADWP has initiated a Power Reliability Program to replace aging infrastructure and make permanent repairs. As development occurs incremental improvements and upgrades will take place under the direction of LADWP. Any general improvements or construction of new facilities are funded by customer revenues and funds allocated to City departments.

An example of local infrastructure planning in the Hollywood area is provided by Public Works in their comment on this document (see Letter 4) that indicates planned improvements and indicates that sewer capacity is adequate in the Planning area for future uses.

The General Plan Framework Element provides a summary of City department monitoring programs and reports; indicating departments and agencies responsible for specific programs. Given the size and complexity of infrastructure systems in the City, all departments work with the Department of City Planning guided by the principles of the General Plan Framework.

The Hollywood Community Plan includes a Mitigation Monitoring Plan, adopted with the Final EIR, which addresses programs specific to the proposed Hollywood Community Plan. Although the proposed Plan allows for increased density in targeted areas, future discretionary city project approvals shall also be subject to CEQA, requiring individual environmental review and evaluation.

The Mitigation Monitoring Plan, included with this Final EIR addresses measures/programs specific to the Proposed Hollywood Community Plan and identifies the responsible agency for monitoring each.

As a program EIR, this document does not provide project level environmental clearance for subsequent discretionary projects. It would not be reasonable and it would be speculative to prepare and analyze the range of impacts for all future projects through 2030 in Hollywood based on project type, construction, operation, location and proximity of uses, and current environmental conditions at the time of adoption of this program EIR. Each discretionary project review and approval will require its own environmental clearance at that time.

***MR-3. Opinions and General Support or Opposition to the Proposed Plan***

Many comments received express opinions of the author and whether the individual supports or opposes the proposed project: the Hollywood Community Plan Update. The City of Los Angeles welcomes all comments; however, opinions and expressions of opposition and support unrelated to physical environmental impacts should be appropriately addressed outside the CEQA process. The purpose of an EIR is to objectively present information regarding potential environmental impacts of a project. The purpose of accepting comments on a Draft EIR and subsequent publication of a Final EIR is for any errors to be identified and corrected. Opinions concerning issues not addressed by CEQA (such as socio-economic issues) and opinions regarding environmental issues already addressed in the EIR, as well as expressions of opposition or support for a project, are forwarded to the decision-makers for their consideration in taking action on the project, but such comments do not require detailed response in a CEQA document.

Regarding comments on the Proposed Plan itself and recommendations for different designations, the Proposed Plan includes a range of recommended densities on various sites based on broad-scale planning principals and site-specific factors. Final Planning Staff recommendations on the inclusion, exclusion and revisions to various land use change subareas analyzed in this document are currently being prepared; these recommendations will be incorporated in to the Staff Report that will be prepared after the initial public hearings prior to action by the City Planning Commission or City Council. After the required public hearing, Staff will recommend Plan refinements (to be included in the Staff Report) that take into consideration the information provided through the hearing process. In addition, as part of the decision making process, decisionmakers may find that area-specific and other factors result in not all subareas proposed for change being as suitable for the recommended use or density as others, and that may result in further refinements to the Proposed Plan. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts.



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**Specific Responses****1. Governor's Office of Planning and Research State Clearinghouse and Planning Unit, Scott Morgan, Director, June 2, 2011**

1-1 The letter from the State Clearinghouse indicates no comments were received from state agencies. No response is necessary.

**2. South Coast Air Quality Management District, Ian MacMillan, Program Supervisor, June 1, 2011**

2-1 See detailed responses below.

2-2 The City understands the concern with developing residential use within 500 feet of a freeway. The Draft Hollywood Community Plan Update (as with many planning documents in the state) identifies potential locations for development based on a number of factors including land use compatibility, preservation of historic resources, proximity to uses that reduce trips, and so on. Health risk is an evolving issue area that must be addressed as part of residential development. Page 4.6-22 of the Draft EIR indicates that, the impact of locating receptors within close proximity to the freeway would be potentially significant. Currently the City undertakes review of health risks associated with proximity to freeways as part of individual project review. See Section 4, Corrections and additions for mitigation measures added to address this issue.

2-3 See Response 2-2 above.

2-4 Comment noted. See Response 2-2 above for the added mitigation measure addressing health risk.

2-5 See Response 2-2 above.

2-6 See Section 4, Corrections and Additions for page 4.6-26 and additional conditions added to Mitigation Measure 1.

**3. City of Los Angeles Council District 5, Paul Koretz, Council Member District 5, May 31, 2011**

3-1 General comments acknowledged regarding the Proposed Hollywood Community plan update. See detailed responses below.

3-2 The commenter's recommendations for La Cienega Boulevard, including requiring a ground-floor commercial component in all new development, requiring pedestrian-oriented design and support for a business improvement district, will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating this area of change for revised recommendations. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.

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- 3-3 The commenter raises the concern that the zone change to (Q)CM-2D in Subarea 39:4 will allow purely residential uses, diminish opportunities for industrial uses and create the potential for conflicts between residential and adjacent industrial uses. This subarea is proposed as a Hybrid Industrial Zone which would allow a Floor Area Ratio (FAR) of 3:1 for a mix of industrial and residential, or industrial and commercial uses, when a minimum square footage of targeted industrial uses is maintained (see Draft Text of Q Conditions, Appendix A.3). The proposed Qualifying Condition expressly prohibits residential only projects. By conditioning approval of the bonus FAR on specific identified media-related uses (see Draft Q and D Conditions, Appendix A.6), the zoning proposed by the Draft Plan is intended to incentivize the retention of media-related uses. Concerns about incompatibility of industrial and residential uses will be forwarded to the decisionmakers for their consideration. See Response MR-3.
- 3-4 The commenter's recommendation that Subarea 39:4 be zoned M1-2D, and the commenter's request that the Planning Department provide a report on the economic impact of the proposed zone change will be forwarded to the decisionmakers for their consideration. See Response MR-3.
- 3-5 The commenter's support of Modified Street Standards on La Brea Avenue is noted and will be forwarded to the decisionmakers for their consideration. See response MR-3.
- 3-6 The commenter asks that Martel Avenue north of Melrose be designated as a local street to facilitate the installation of speed tables and other traffic-calming measures. Staff is evaluating this inclusion. This request will be forwarded to the decisionmakers for their consideration in taking action on the Plan. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.
- 3-7 The commenter asks that the EIR include an implementation mechanism by which development is charged for the full incremental impact on all City infrastructure. The Draft EIR and the Draft Plan both recommend that a nexus study be conducted to determine the cost of implementing traffic mitigation measures and develop a means of allocating the cost of mitigation to individual development projects (Program M.1.1.1). The Draft Plan also recommends that a nexus study be conducted to determine the impact of future commercial and multifamily residential development on the need for open space and develop community-wide mitigations funded by impact fees (Program LU.4.1.1). The request that development be charged for impacts on all other City infrastructure will be forwarded to the decisionmakers for their consideration. See Responses MR-2 and MR-3.
- 3-8 The commenter refers to the Central City West Specific Plan and the Warner Center Specific Plan as examples of Plans that establish impact fees for infrastructure. Commenter's reference is noted and will be forwarded to the decisionmakers for their consideration. See Responses 3-7, MR-2 and MR-3.
- 4. City of Los Angeles Public Works, Ali Poosti, Acting Division Manager Wastewater Engineering Services Division Bureau of Sanitation, May 31, 2011**
- 4-1 Comment noted. The commenter summarizes the existing sewer infrastructure framework.
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- 4-2 Comment noted. The Hollywood Community Plan provides generalized planning guidance to future development and does not seek discretionary project level environmental clearance. Specific project-level detail is not available at this time. Additional environmental review will be undertaken as appropriate as specific projects are proposed.
- 4-3 The comment from Public Works indicating that the condition of primary sewers in the area is generally good to very good with one rehabilitation project planned and no additional relief projects needed at this time, is noted. In addition the fact that adequate capacity exists is also noted.
- 4-4 The comment from Public Works indicating that the capacity of secondary sewers are adequate for current and future development is noted.
- 4-5 The sewer repair, renewal, and replacement projects identified by the commenter in Table 3 are currently planned and proposed to be funded through currently anticipated fees already collected (or anticipated to be collected) from the regular Sewer Service Charge. Individual development projects will be subject to additional CEQA review as appropriate and, if they are found to create additional significant impacts to existing (or planned) lines (or other sewer facilities), the developer will be required to pay a fair share contribution (or possibly payment in full as may be appropriate) towards the costs of repairs, upgrades, or replacement sewer lines and/or facilities.
- 4-6 Comment noted. As indicated above, additional environmental review will be undertaken on individual projects as appropriate as such projects move through the project review and entitlement process.

**5. Central Hollywood Neighborhood Council, Scott Campbell, President, May 27, 2011**

- 5-1 Comment noted. See MR-3. The commenter indicates the opinion that the Draft EIR fails to provide essential mitigations for the severity of the impacts described and request that all mitigations be not only feasible but also enforceable. The Planning Department believes that all mitigation measures presented in the Draft EIR are feasible and enforceable and that mitigation measures are identified as appropriate for each impact. The commenter identifies specific deficiencies believed to exist in the following comments; detailed responses are provided below.
- 5-2 Comment noted. The commenter proposes the adoption of a Community Plan Implementation Overlay to provide for supplemental development regulations that are tailored to each Community Plan Area. A Community Plan Implementation Overlay is an ordinance that may further regulate and tailor development regulations at a neighborhood level. The comment is acknowledged and will be forwarded to the decisionmakers for consideration. Staff is evaluating this area of change for revised recommendations. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. Policy LU.2.5 of the Proposed Plan Text supports the creation of a design overlay for the Hollywood and Sunset Boulevard areas, as shown on Plan maps 25 and 26. Commenter's suggestion that a Community Plan Implementation Overlay be initiated with expanded boundaries is noted and will be forwarded to decisionmakers for their consideration in taking action on the Proposed Plan.

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- 5-3 The comment regarding the implementation of open space linkages is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Commenter's request that a policy supporting the creation of the Hollywood Central Park be included in the Plan is acknowledged and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is developing a policy for consideration by decisionmakers. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.
- 5-4 The comment regarding inconsistencies in land use changes proposed by the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Propose Plan. The subject zone change is the addition of a [Q] qualifying condition to the pre-existing M1 zone to preserve industrial land uses. See Response MR-3.
- 5-5 The comment regarding inconsistencies in land use changes proposed by the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. The intent of the subject zone change is to recognize the existing industrial land uses, per commenter's statement, and shall be evaluated. See Response MR-3.
- 5-6 The comment regarding inconsistencies in land use changes proposed by the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration. The commenter's reference to Case No. CPC-2009-3158-GPA-ZC-SPR is acknowledged. The intent of the subject zone change is to recognize the heights and setbacks set in CPC-2009-3158-GPA-ZC-SPR and is being evaluated by staff. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.
- 5-7 The comment regarding inconsistencies in land use changes proposed by the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration. The commenter identifies a typographical error in the list of corresponding zones for Subarea 40:3, and is being addressed per the comment. See MR-3.
- 5-8 The comment regarding zoning proposed by the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 5-9 The commenter states that proposed zoning for SubArea 17:3 would create a loss of allowable Floor Area Ratio (FAR) from the current allowed FAR of 1.5:1. The proposed Hybrid Industrial Incentive would allow a higher FAR of 3:1 when a minimum 0.7:1 FAR of targeted media-related industrial uses are incorporated in a project. A maximum FAR of 1.5:1 would continue to be allowed for projects that comply with zoning requirements.
- 5-10 The commenter states that while the environmental analysis clearly identifies which Public Services would be significantly impacted, the Draft EIR does not propose reasonable and tangible mitigation measures to reduce project impacts. The Draft EIR includes mitigation measures (beyond the Plan policies) for each of the Public Services (Fire, Police, Public

Libraries, Parks and Public Schools). These additional mitigation measures are listed in each section and summarized in **Table 2-2: Summary of Impacts and Mitigation Measures** in the Draft EIR. The commenter does not specifically identify which mitigation measures could be ineffective and why, therefore no further response is possible.

- 5-11 The commenter notes that in some areas of the Public Services section, current Police statistics are not included, and the provided data is outdated. The Initial Study was prepared in 2005, and the “Existing Conditions” for the Draft EIR analysis were based on the conditions as they existed in 2005. While the information used was current at the time it was written, as the commenter notes, some of the information has become dated. While none of the outdated information is critical to the conclusions presented in the Draft EIR, more recent information is provided, where available, in this Final EIR, both in these responses to comments and in the Corrections and Additions in Section 4 of this document. The most recent citywide and Hollywood area police crime statistics available on the LAPD website are for the dates 07/17/11 to 08/13/11 and are included below, along with crime statistics, year to date, for the years 2011, 2010, and 2009:

Crime Type	Hollywood Area			Citywide				
	07/17/11-08/13/11	YTD* 2011	YTD* 2010	YTD* 2009	07/17/11-08/13/11	YTD* 2011	YTD* 2010	YTD* 2009
<b>Violent Crimes</b>								
Homicide	0	3	10	8	20	182	200	194
Rape	3	37	35	22	47	417	501	554
Robbery	40	290	331	415	813	6,193	6,874	7,599
Aggravated Assaults	31	254	216	303	732	5,548	5,922	6,853
<b>Total Violent</b>	<b>74</b>	<b>584</b>	<b>592</b>	<b>748</b>	<b>1,612</b>	<b>12,340</b>	<b>13,497</b>	<b>15,200</b>
<b>Property Crimes</b>								
Burglary	45	306	314	395	1,238	10,143	10,495	11,165
Grand Theft Auto	25	296	335	409	1,136	9,512	10,501	11,309
Burglary Theft From Vehicle	123	919	825	854	1,822	15,595	17,610	17,791
Personal/Other Theft	105	1,003	1,008	1,007	1,930	16,377	16,741	17,314
<b>Total Property</b>	<b>298</b>	<b>2,524</b>	<b>2,482</b>	<b>2,665</b>	<b>6,126</b>	<b>51,627</b>	<b>55,347</b>	<b>57,579</b>
<b>Total Part I</b>	<b>372</b>	<b>3,108</b>	<b>3,074</b>	<b>3,413</b>	<b>7,738</b>	<b>63,967</b>	<b>68,844</b>	<b>72,779</b>
Child/Spousal Abuse (Part I & II)	33	246	260	278	836	6,911	7,662	7,857
Shots Fired	4	28	23	32	192	1,768	1,879	1,869
Shooting Victims	1	10	20	9	84	841	889	810
* Year to Date								
Source: Los Angeles Police Department, <a href="http://www.lapdonline.org">www.lapdonline.org</a> , COMPSTAT Citywide and Hollywood Area Profiles, 07/17/11-08/13/11								

Arrests by Type	Hollywood Area				Citywide			
	07/17/11-08/13/11	2011	2010	2009	07/17/11-08/13/11	2011	2010	2009
Homicide	1	11	6	11	26	170	191	232
Rape	0	5	9	7	13	139	177	153
Robbery	20	105	113	139	289	2,085	2,314	2,588
Aggravated Assault	25	229	223	258	692	5,391	5,748	6,273
Burglary	10	98	82	89	249	2,088	1,958	2,164
Larceny	25	225	279	258	647	5,380	6,208	5,338
Auto Theft	5	47	38	47	157	1,239	1,351	1,360
<b>Total Violent</b>	<b>46</b>	<b>350</b>	<b>351</b>	<b>415</b>	<b>1,020</b>	<b>7,785</b>	<b>8,430</b>	<b>9,246</b>
<b>Total Part I</b>	<b>86</b>	<b>720</b>	<b>750</b>	<b>809</b>	<b>2,073</b>	<b>16,492</b>	<b>17,947</b>	<b>18,108</b>
<b>Total All Arrests</b>	<b>1,188</b>	<b>9,240</b>	<b>9,543</b>	<b>9,232</b>	<b>12,921</b>	<b>101,585</b>	<b>105,374</b>	<b>114,986</b>

Source: Los Angeles Police Department, [www.lapdonline.org](http://www.lapdonline.org), COMPSTAT Citywide and Hollywood Area Profiles, 07/17/11-08/13/11

5-12 See Response 3-7.

5-13 Ensuring an adequate water supply continues to be one of the major challenges facing the City of Los Angeles. The City is committed to providing residents with adequate water and the Los Angeles Department of Water and Power (LADWP) is in charge of delivering water to the City. As such, the Planning Department will continue to work with LADWP to ensure sufficient water supply as needed in the future. Any mitigation measures proposed by the Planning Department must be compatible with LADWP policies and requirements.

The LADWP 2010 Urban Water Management Plan documents the current, and forecasts the future, supply and demand of water. While currently the City purchases almost half of its water supply from the Metropolitan Water District (MWD), LADWP's measures to implement conservation, recycled water, stormwater capture, and water transfers will effectively reduce the City's reliance on MWD water purchases significantly.

The City of Los Angeles Water Supply Action Plan 2008 outlines the review of new development as a long-term strategy to enhance water conservation; accordingly the Los Angeles Green Building Code Ordinance provides a checklist of mandatory codes and voluntary actions to promote water efficiency and conservation. The mandatory codes require new development projects to include separate meters (determined by size and use), plumbing fixtures and fittings that reduce the overall use of potable water, methods to reduce the generation of wastewater, and restricted landscape irrigation. Incentives are also available for projects that comply with LADWP's Green Building Policy and take extra steps to conserve water. The City has been successful in reducing water demand through the implementation of conservation measures. According to the City of Los Angeles' Water Supply Action Plan water demand in 2006-2007 was about the same as it was 25 years prior, despite a population increase of 1 million people.

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The growth projections for the Hollywood Plan area are within the assumptions of the 2010 Urban Water Management Plan for the City as a whole.

- 5-14 The commenter's suggestions to address water supply are noted. See MR-3. See also Response 5-13 regarding the 2010 Urban Water Management Plan. Water rationing (through structured water rates) and conservation, are already in effect in the City of Los Angeles. The degree of rationing and conservation requirements and enforcement, will vary with the availability of water, with more stringent measures being put into effect as needed.
- 5-15 See Response 5-13 regarding the City's Urban Water Management Plan Projections for Hollywood are consistent with growth assumptions for the City as a whole.
- 5-16 As noted in the comment, the EIR states (page 4.5-27), "A total of 58% of Hollywood roadways are forecast to operate at an LOS E or F in 2030 under the Proposed Plan scenario, the same as for the Existing Plan scenario. Figure 4.5-6 identifies the location of all links that are forecast to operate at LOS E or worse for the 2030 Proposed Plan conditions during the PM peak hour." The Mobility policies of the Community Plan are designed to provide tangible mitigation for these impacts.
- 5-17 The nexus study and the development of a Hollywood-wide traffic impact fee is a recommendation of the EIR and a future implementation program of the Hollywood Community Plan policy text; it is not a required impact mitigation measure (see page 4.5-30), rather it is one mechanism to ensure that all improvements identified in the Plan/TIMP are implemented. A mitigation measure that recommends a future study without identification of when the study would occur or what the outcomes could lead to would be impermissible under CEQA (deferred mitigation); this EIR does not inappropriately defer mitigation for foreseeable impacts. Rather impacts that can be identified are included in the EIR; the nexus study would simply provide a mechanism to fairly distribute costs. City guidelines for traffic impact studies require project-specific studies for all developments that generate 500 or more daily trips or 43 or more PM peak hour trips. Such project-specific traffic studies include mitigation measures as feasible and appropriate to address impacts on a project-by-project basis.
- 5-18 The Community Plan Update does not amend the Bicycle Plan. Adoption or amendment of the Bicycle Plan requires a separate action of the City Council. The Community Plan is consistent with the Bicycle Plan. The Draft Hollywood Community Plan was prepared and circulated to the public in advance of adoption of the Bicycle Plan. The Bicycle Plan provides analysis of routes that are proposed, but many routes (including within the Hollywood Community Plan Area) have not been determined in detail and will require subsequent environmental review as they are planned in detail and impacts can be evaluated. The Department of Transportation and the Department of City Planning are coordinating a Five Year Implementation Plan for the Bicycle Plan. As projects are designed, approximately annually, project's anticipated to be implemented in the following year will be analyzed as appropriate, those projects that are not already sufficiently addressed in other environmental documents will be addressed in an EIR. The physical improvements associated with the Bicycle Plan in Hollywood have not been finalized and therefore cannot be addressed in detail in this EIR. (See Corrections and Additions for page 4.5-17.)

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- 5-19 This is a procedural comment and not an environmental impact issue. The comment is acknowledged and the requested update of the City’s Transportation Element is part of the Planning Department’s future work program.
- 5-20 ClimateLA is an existing policy document of the City of Los Angeles that would apply to the Hollywood area. The Hollywood Community Plan is the land use component of the General Plan for the Hollywood planning area. The land use planning documents are complementary to ClimateLA. ClimateLA is discussed on p. 4.6-14 of the Draft EIR, how the Proposed Plan would address ClimateLA is discussed on page 4.6-23 through 4.6-26 of the Draft EIR.
- 5-21 Comment noted. The Draft EIR discusses (pages 4.6-21 through 4.6-22) that emission controls are anticipated to reduce criteria pollutant emissions (CO in particular) in the area. Impacts to sensitive receptors are also discussed in a general manner on page 4.6-22. See also responses to Letter 2 regarding health risks adjacent to the 101 Freeway.
- 5-22 See Response to 5-20 above.
- 5-23 The Hollywood Cap Park is a separate project that is proposed independently from the generalized land use plan that is the proposed Hollywood Community Plan Update. Page 90 of the Draft Proposed Plan indicates, “[t]he difficulty of creating open space in an urban environment where real estate is expensive and built out has led to many creative proposals for alternative conceptions, such as the proposal to create a park over the Hollywood Freeway. The Hollywood Community Plan endorses these creative proposals and encourages the reimagining of open space to include public spaces as well as parkland.” Policy M.1.85 (page 116 of the Proposed Plan) indicates, “[s]upport the construction of pedestrian pathways, bicycle paths and facilities, and the reconnection of Van Ness Avenue, as part of any park space built over the 101 Freeway.” Page 98 of the Proposed Plan includes a map of the proposed Hollywood Cap or Central Park; the map indicates the location of the park and that the, “Freeway Park [is] under study.” Such a park has the potential to have a number of location-specific impacts that are most appropriately discussed in a project-specific environmental document. Also see Response 5-3.
- 5-24 The Draft EIR provides an overview analysis of air quality impacts anticipated to result from the Plan. As discussed in Response 5-21 CO hot spots are anticipated to decrease due to emission controls. State-wide and regional air quality is addressed through both the Federal and State Clean Air Acts. Site-specific mitigation will be identified in project specific environmental analyses as appropriate. A community study of air quality is not needed since it is not anticipated that the Plan itself would result in generalized community impacts.
- 5-25 The Proposed Plan provides land use development guidance and controls. The specific nature of development and location of development with respect to proximity to sensitive receptors and historic buildings is not known. Development of site-specific noise mitigation is required (as appropriate) as individual projects are proposed and proceed through the project-specific environmental review process.
- 5-26 See Response 5-25 above. Details of specific development (location, duration, specific activities to be undertaken) are not known or currently knowable over the 19-year planning horizon of the plan. Project-specific environmental documents are required to address cumulative impacts with other known projects in their vicinity.
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- 5-27 Comment noted. Interior noise levels of 45 dBA (windows closed) are a standard requirement for residential use to ensure that residents are able to sleep comfortably.
- 5-28 Comment noted. See Response 5-27. Building design is up to the individual developer and regulations as they apply to each site including environmental regulations. Optimization of a number of differing factors will result in differing solutions in different locations. The Plan provides only general guidance that must be tailored for each site by individual developers.
- 5-29 Comment noted. Minimizing Greenhouse Gas emissions statewide is now a high priority; high-density development adjacent to transit is one strategy that is anticipated to result in substantial emission reductions. As noted in response 5-28, individual developers must optimize designs to address impacts particular to their location.
- 5-30 Comment noted regarding existing City noise ordinance that applies citywide. A notice advising drivers on particular roadways of the requirements of the citywide noise ordinance is not appropriate as the ordinance applies citywide. This comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 5-31 The Proposed Plan would have no effect on the Hollywood Reservoir or on the subway. Seismic issues associated with these projects are addressed in project-specific environmental documents, as appropriate; as the commenter notes, soil and geologic conditions are site-specific and, therefore, most appropriately addressed in site-specific documents.
- 5-32 The comment identifies a primarily residential area bounded by Santa Monica Boulevard, Highland Avenue, Wilcox Avenue, and Sunset Boulevard and states that portions of the subject area are eligible for designation as a historic district based on the fact that many properties are over 45 years of age. Age alone does not render a property or properties eligible for designation. Properties must be evaluated for significance according to criteria for listing in the National Register, California Register and under the City's Historic-Cultural Monument and Historic Preservation Overlay Zone ordinances. The majority of the subject area is located within the Community Redevelopment Agency's Hollywood Redevelopment Area. That portion was surveyed as part of the Hollywood Historic Resources Survey Update and the results are in draft format. Contact the Community Redevelopment Agency for further information about these findings. The remaining portion of the subject area was surveyed by SurveyLA, the citywide historic resources survey administered through the City Planning Department. Preliminary findings for SurveyLA did not identify any properties or districts within the boundaries identified above in the SurveyLA area eligible for designation under the criteria of the programs listed above. Findings of SurveyLA and the CRA survey are in draft format and undergoing formal review processes which includes public hearings.
- 5-33 The commenter discusses the findings of the 2007 Draft EIR for the Hollywood Archstone Project with regard to potential impacts of the project to historical resources. The City Planning Department has no plans to reference the Hollywood Archstone Project EIR or proposed mitigation measures as part of the Hollywood Community Plan as the project was terminated. The commenter's request for the initiation of a Historic Preservation Overlay Zone for the area bounded by Santa Monica Boulevard, La Brea Avenue, Sunset Boulevard, and Highland Avenue shall be referred to the decisionmakers.
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- 5-34 The potential presence of hazardous materials and increased risk of exposure are as a result of developing land that has been industrially zoned is addressed in Section 4.10. As indicated in the analysis presented in the Draft EIR regulatory review and existing regulations address the need to clean up sites as may be necessary. Any contamination on individual sites will be addressed as part of the review and entitlement process on a project-by-project basis.

For the most part, industrially zoned land is being changed to non-residential/commercial use, from Commercial Manufacturing to General Commercial and Regional Center Commercial, and from Limited Manufacturing to Commercial Manufacturing, with some Commercial Manufacturing and Limited Manufacturing being changed to Public Facilities. These changes are being made to reflect and provide consistency with existing land use and to minimize land use conflicts.

- 5-35 The Hybrid Industrial Zone allows a Floor Area Ratio of 3:1 for projects that incorporate a minimum Floor Area Ratio of 0.7:1 for targeted industrial uses. The minimum Floor Area Ratio of 0.7:1 of targeted uses to trigger the incentives does not prevent higher Floor Area Ratios of industrial uses. Existing Floor Area Ratios of 1.5:1 are maintained per the pre-existing uses and zoning.

5-36 See Response 5-34.

5-37 See Response 5-35.

**6. East Hollywood Neighborhood Council Planning and Entitlement Review Committee, Armen Makasjian, District 5 Representative, May 31, 2011**

6-1 See Response MR-1.

6-2 See Response MR-1.

6-3 See Response MR-1.

6-4 See Response MR-1.

6-5 The commenter's opinions regarding the implementation of community plan standards are noted. See Response MR-3.

6-6 The Hollywood Community Plan Update includes parking policies in Chapter 4. – The Mobility Plan, Policies M.1.90-M.111.

6-7 See Response MR-1.

6-8 See Responses MR-1 and MR-3. Commenter's opinions regarding rental prices of new housing units are noted. The City's Rent Stabilization Ordinance does not currently apply to any new development in the City of Los Angeles or within the existing Hollywood Community Plan. The proposed Hollywood Community Plan Update does not modify these provisions.

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- 6-9 The commenter quotes a report by the LAEDC concerning vacancy rates and the economic forecast. No response is needed.
- 6-10 The commenter’s opinion regarding the impact of the LAEDC economic forecast on Hollywood has been noted and forwarded to the decisionmakers for their review. See Responses MR-1 and MR-3.
- 6-11 The Hollywood Community Plan Update contains many policies that are intended to promote development that blends with the character and scale of existing development in residential neighborhoods and neighborhood commercial areas. See Policies and Programs to protect historic neighborhoods, pages 57-62; Policies to preserve stable single-family residential neighborhoods, pages 62-64; Policies to protect the character of front yard landscapes in residential neighborhoods, page 64; Policies and Programs to maintain existing pedestrian-oriented districts, pages 64-68; and Policies to protect hillside neighborhoods, page 68. The Hollywood Community Plan Update also includes Chapter 7 – Urban Design Guidelines, which provide policy guidance to decisionmakers to improve the quality of the built environment and achieve compatible infill development.

The commenter’s opinions about the incompatibility of new development with existing development and the use of variances is noted and forwarded to decisionmakers for their review. See Response MR-3.

- 6-12 The commenter’s opinions regarding the Central Hollywood NOW Survey and the use of density bonuses are noted and forwarded to decisionmakers for their review. See Response MR-3.
- 6-13 The commenter summarizes concerns regarding vacancy rates, the decline in population, density bonus laws, deviations from community plan standards, and the needs of the community. Comments are noted and will be forwarded to decisionmakers for their review. See Response MR-3.

**7. East Hollywood Neighborhood Council, Eric J. Moore & Craig E. Cox: Vice President, Public Safety Committee CoChairs**

- 7-1 The commenter notes that the number of police officers in Hollywood today falls short of the General Plan Framework ratio of coverage. The EIR indicates the thresholds of significance for impacts to police services could result if the Proposed Plan were to: (1) induce substantial growth or concentration of population beyond the capacities of existing police personnel and facilities; or (2) cause deterioration in the operating traffic conditions that would adversely affect the police emergency response time.

The method used today by LAPD for determining police office deployment across Hollywood is a computer model called Patrol Plan (not the ratios identified in the General Plan Framework), as described in Section 4.3 of the Draft EIR, which considers 25 different variables such as forecast call rate, average service time, etc. Patrol Plan is an example of information-led policing. It targets police officers where they are needed most and has enabled LAPD to reduce crime with fewer resources. Using Patrol Plan, LAPD has succeeded in reducing crime for nine years in a row. Part I crimes (violent crimes and property crimes) declined 6.9% in LA between 2009 and 2010, and 66.5% between 1992

and 2009. In 2010 there were fewer than 300 murders in LA compared to approximately 1000 murders every year in the 1990s.

The commenters' concerns will be forwarded to the decisionmakers for their consideration. Also, see MR-2.

**8. Greater Griffith Park Neighborhood Council, Ron Ostrow & Gary Khanjian, Chairman, Planning, Zoning, Historic Preservation Committee, June 1, 2011**

- 8-1 Increased density by itself does not increase transit ridership. However, increased density located in close proximity to high-quality transit service provides more residents and employees with the option to use transit services. Many variables effect transit ridership, including availability of a car, parking costs, transit speeds and fares, levels of congestion on roadways, etc. There is a higher potential of transit use when potential transit riders are located in close proximity to the transit service. Comment is noted and referred to the decisionmakers.
- 8-2 The Comment does not raise a specific question relating to the Draft EIR, and does not reference a specific study or aspect of the environmental analysis. There are many external studies relating to transit oriented development. Comment is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 8-3 Transit service in the area in question is provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Los Angeles (LADOT's DASH and Commuter Express). Page 43 of the Hollywood Community Plan Update text outlines the many types of transit service available in Hollywood. Map 11 of the Hollywood Community Plan Text shows major transportation routes. Full routes are available at [www.metro.net](http://www.metro.net).
- 8-4 While the Proposed Plan does not propose adding public parking at transit centers, it does include Policy M.103: "Encourage owners of existing parking resources with excess parking, whose parking facilities are located within walking distance of a Metro station to offer monthly leases to Metro commuters to park onsite."
- 8-5 The City of Los Angeles Planning Department is the lead agency for environmental review purposes and developed the Draft Hollywood Community Plan Update. Other City and local government agencies were consulted and/or provided with the opportunity to review, comment, and provide input at various points in the preparation of the document.
- 8-6 The Proposed Plan recognizes the importance of preserving the character of existing neighborhoods. For a complete list of recommended policies, see the Proposed Plan's Chapter 3, Goal LU.1 Conserve viable neighborhoods, industrial districts, pedestrian-oriented districts, historic cultural resources, and alleys, Page 55.
- 8-7 The Proposed Plan strives to promote a diverse range of housing types. See Chapter 3, LU.2 Provide a range of employment and housing opportunities: Policies to provide an adequate range of housing opportunities (Policy LU.2.17-LU.2.23) page 81.
- 8-8 Several policies in the Hollywood Community Plan Update complement policies in adjacent communities and cities. Policies to prohibit auto-related uses and a height limit are proposed

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along Hyperion Avenue between Rowena Avenue and Santa Monica Boulevard to complement policies in the Silver Lake Community Plan. For example, Policy M.1.46 on page 110 of the Hollywood Community Plan Update’s Mobility Plan proposes to restripe Fairfax Avenue between Willoughby Avenue and Melrose Avenue to allow for bike lanes to complement bikeway improvements in the City of West Hollywood.

- 8-9 The Hollywood Community Plan Update proposes many policies to improve walkability – see Chapter 3 of the Land Use Plan, Goal LU.3. Make Streets Walkable. Proposed policies for segments of Rowena Avenue restrict auto-related uses and modify street standards to widen sidewalks.
- 8-10 The Proposed Plan’s Draft EIR has been circulated and review of this Final EIR and Mitigation Monitoring Report is the next step in the process. The Area Planning Commission, the City Planning Commission, and the Planning and Land Use Management Committee of the City Council will review the Proposed Plan and Final EIR, and final action will be taken by the City Council. Final action is anticipated in early to mid-2012.
- 8-11 The comment regarding the availability of funding for completing the Hollywood Community Plan Update is noted. The Draft EIR and full draft plan were completed and circulated for review in March 2011.
- 8-12 The Draft EIR notes that, “[a] total of 58% of Hollywood roadways are forecast to operate at an LOS E or F in 2030 under the Proposed Plan scenario, the same as for the Existing Plan scenario.” This compares to 41% at E or F today, indicating more congestion and slower travel speeds. The policies of the DHCP propose numerous improvements to the pedestrian environment, including street standards with wider sidewalks and parkways along sidewalks. The EIR authors are not aware of any data correlating traffic levels with crime levels.
- 8-13 See Chapter 7 of the Proposed Plan, which presents draft urban design guidelines for the review of projects. Program LU.1.27.1, in Chapter 3 – the Land Use Plan, proposes that design guidelines be developed for commercial uses on Hillhurst Avenue between Franklin and Los Feliz Avenues.
- 8-14 See EIR Section 4.3 Public Schools, starting on page 4.3-22 for an analysis of impacts to schools.
- 8-15 See EIR Section 4.9 for an analysis of Cultural Resource impacts.
- 8-16 The comment describes the “economic and social diversity” of the Hollywood community as a preamble to recommendations beginning in comment 8-17. No response is needed..
- 8-17 Comments recommending zone changes by street are noted and will be forwarded to the decisionmakers for further review. See Response MR-3.
- 8-18 Comments recommending Historic Preservation Overlay Zones are noted and will be forwarded to decisionmakers for further review. See Section 4.9 for an analysis of impacts to Cultural Resources and proposed mitigation measures.
- 8-19 The Draft Hollywood Community Plan Update includes a series of policies and programs to protect historic neighborhoods – see page 55 of Chapter 3, the Land Use Plan. Two

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programs are proposed specifically for the Greater Griffith Park Neighborhood Council area. Program LU.1.5.1 proposes to develop a historic preservation district or districts in Los Feliz, including the recently adopted Hollywood Grove Historic Preservation Overlay Zone. Program LU.1.5.4 proposes to study the garden apartments in the block bounded by Prospect Avenue on the north, Rodney Drive on the west, Lyman Place on the east, and the alley north of Hollywood Boulevard on the south for potential historic significance.

The commenter expresses concerns regarding retaining the historic character of Los Feliz Village. Los Feliz Village is located within the boundaries of the Vermont-Western Station Neighborhood Area Plan (the SNAP). The SNAP requires review of individual projects for compliance with SNAP regulations and offers the opportunity for review of project design. The Proposed Plan upholds the SNAP and does not propose any change to this area except clarification regarding the jurisdiction of the SNAP.

8-20 Comment noted. See Response MR-3.

8-21 The commenter requests that the Draft EIR explores the possibilities for neighborhood parks in the area and includes public and private funds for increasing and improving parks and open spaces were taken into consideration.

The Public Parks section of Chapter 4.3 Public Services addresses the existing and anticipated park and recreation facilities and notes the need for additional community and neighborhood parks as well as the factors which effectively prevent the development of additional parks, such as a high level of development and resulting lack of lands available for conversion into parks and the existing budget constraints.

Using public and private funding for the acquisition and construction of new community and neighborhood recreation and park facilities is identified as proposed Mitigation Measure 1 (page 4.3-22 of the Draft EIR), “[d]evelop City or private funding programs for the acquisition and construction of new Community and Neighborhood recreation and park facilities.”

8-22 The Public Schools section of Chapter 4.3 Public Services addresses the need for school classrooms K through 12 to serve the forecasted population in the Community Plan Area. Multiple use of school sites are taken into consideration in proposed Mitigation Measure 1 in the Public Schools section (page 4.3-36 of the Draft EIR), which states, in part, “[d]evelop plans to address issues relating to siting and the joint use of facilities.” In addition, proposed Mitigation Measure 3 in the Public Parks section states (page 4.3-22 of the Draft EIR), “[e]stablish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the CPA.”

8-23 The Draft EIR in Section 4.5 demonstrates traffic conditions with the proposed plan.

8-24 The Proposed Plan contains Mobility policies M.1.90 through M.111 that address parking issues. The availability of parking is not an environmental issue addressed by CEQA unless lack of parking could lead to other physical environmental impacts.

8-25 See Response 8-7.

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- 8-26 Comment noted. The Hollywood Community Plan Update is a document prepared by the City Planning Department, in cooperation with other City Departments, government agencies and the Los Angeles Unified School District.
- 8-27 The commenter recommends including sources of funds to implement the Update in the Proposed Plan and Draft EIR. In general, implementation of the Proposed Plan and the mitigation measures listed in the Draft EIR will be funded from the City's General Fund as part of each implementing department's annual budget, as the proposed Plan and mitigation measures are incorporated into each implementing department's work program. In some instances, special fees may be charged to help fund the implementation of some of the Plan's programs and mitigation measures, as feasible. See also Response MR-2.
- 8-28 Comment noted. The Hollywood Signage Supplemental Use District was adopted in 2004, by Ordinance No. 176172, to promote signage that complements the historic architecture and signage of Hollywood Blvd. This ordinance was amended in the fall of 2010 to further prohibit the installation of new supergraphic off-site advertising.
- 8-29 Comments are noted and will be forwarded to the decisionmakers for further consideration. See Response MR-3.
- 8-30 Comments noted. See Responses 8-17 to 8-28.
- 8-31 Comments noted. See Response MR-1. See Response 8-7 regarding "affordable housing." The Proposed Plan identifies policies to provide a range of employment and housing opportunities (Goal LU. 2) HCP, page 71. See Response MR-2 regarding infrastructure funding.
- 8-32 Comments regarding the goals stated in the plan are acknowledged and noted and will be forwarded to decisionmakers for further consideration. The Draft EIR analyzes the impact of the Proposed Plan to the existing environment; this document provides responses for comments to the Draft EIR. The Draft Hollywood Community Plan Update proposes policies to preserve existing housing stock, viable neighborhoods, historic and cultural resources, walkable streets, improved open space and public spaces, and sustainable land use and building design. See Draft HCP Chapter 3 Land Use Plan. See Response MR-3.
- 8-33 Comment noted. The requested Chapter 5 – Community Facilities and Infrastructure and the Draft Environmental Impact Report were circulated for public review in March 2011.
- 8-34 Figure 4.5-6 illustrates the roadways that will operate at LOS E or F in 2030 with the Proposed Plan. The Appendix containing the Hollywood Community Plan TIMP provides the detailed information requested on volumes on individual roadway segments. The Draft EIR contains the recommendation that a nexus study be conducted to provide a source of funding for transportation infrastructure improvements. Chapter 4.0 of the Hollywood Community Plan TIMP includes information on regional transportation planning conducted by many of the agencies noted in this comment. They are also mentioned in many of the Mobility policies in the Hollywood Community Plan.
- 8-35 This comment relates to Mobility policies that the commenter suggests should not be recommended until they are further clarified. No comments are made concerning potential

environmental impacts in any CEQA impact category. The comment will be forwarded to the decisionmakers for further review and consideration. See also Response MR-3.

- 8-36 Comments regarding revisions to the policies of the Proposed Plan are noted and will be forwarded to the decisionmakers for further review and consideration. Staff is refining policies in the Community Plan text and evaluating this suggestion. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.
- 8-37 Drafts of the Hollywood Community Plan and EIR are available on <http://cityplanning.lacity.org> under 'Latest Plan Update.' Hard copies can be obtained from the Department of City Planning.

For a more information regarding implementation, monitoring, and potential funding sources for the plan see the Proposed Plan Chapter 6 Implementation, page 151. The chapter outlines recommendations and proposed programs and identifies responsible parties. A Mitigation and Monitoring Report for the Draft EIR will be adopted with the Final EIR.

Comments expressing support for sections of the plan are noted. The Board's recommendations are noted and will be forwarded to the decisionmakers for further review and consideration. See response MR-3.

- 8-38 The comments in response to the Urban Design Guidelines of the Proposed Plan are noted and will be forwarded to the decisionmakers for further review and consideration. Staff is refining text in the Community Plan and evaluating these suggestions. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. See Response MR-3.
- 8-39 The comments in the transcript of the GGPNC/PZHP Forum on DHCP/Draft EIR March 30, 2011 are noted and will be forwarded to the decisionmakers for further review and consideration. See Response MR-3.

For more information regarding Griffith Park, see DHCP Chapter 3 Land Use Plan Goal LU.4, page 90 and Draft EIR Section 4.3 Public Services: Public Parks, page 4.3-18.

Comments regarding population and Census 2010 should refer to MR-1.

The Draft Hollywood Community Plan and Draft EIR strive to promote consistency with the General Plan and all citywide documents. Staff is refining text in the Community Plan to correspond with the recently adopted Hillside ordinance. It is not anticipated that changes to the Proposed Plan will result in any significant changes to the analyses or conclusions presented in this Final EIR. In general, refinements to the Proposed Plan are anticipated to if anything, decrease impacts. The policies in the Community Plan are in concert with efforts to limit mansionization and permit appropriately scaled development in the hillside areas of the city.



The urban design guidelines outlined in the Proposed Plan provide recommendations to guide future development in the Community Plan Area; however individual projects are reviewed on a case-by-case basis. The inclusion of Chapter 7, Urban Design Regulations, further details the Citywide Design Guidelines adopted by the City Planning Commission in June of 2011. Together, these design guidelines form the basis of creating transparent and consistent expectations for quality development responsive to surrounding neighborhood character. All discretionary decisionmaking may reference these tools. Furthermore, the Plan proposes the establishment of a design overlay for Hillhurst Ave (Policy LU.1.27.1).

Additional comments regarding park shortages, proposed zoning changes, the requested retention of scale and the establishment of additional height restrictions, the establishment of a Community Design Overlay Zone, the recommendations for a workshop date, and comments regarding Los Feliz Village are noted. Staff is revising the proposed changes and comments will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

The Draft EIR analyzes LAUSD public schools in the Hollywood CPA as a baseline for students residing in the area and their operating capacity as the population increases. For a more complete analysis see Draft EIR Section 4.3 Public Services: Public Schools, page 4.3-22.

See MR-1 in regards to growth forecasts.

Mitigation measures and programs identified in the plan will be further outlined in the Mitigation and Monitoring Report of the Final EIR. The report will also identify agencies and departments responsible for implementation and monitoring. Commenter identifies those impacts that are significant and unavoidable after mitigation.

The comments regarding the expansion of the proposed Community Design Overlay for Hillhurst Avenue, future Historic Preservation Overlay Zones, and a Nexus Study for transportation impact fees are noted and will be forwarded to the decisionmakers for further review and consideration. See Response MR-3 and 5-17. For more information regarding strategies and policies to mitigate and manage mobility and access, see Draft EIR Section 4.5 Transportation and Appendix C Transportation Improvement and Mitigation Program TIMP.

**9. Hollywood Hills West Neighborhood Council, Anastasia Mann, President, June 1, 2011**

9-1 Background information and general comments and opinions provided by the commenter are noted. The inclusion of a nexus study to develop impact fees for transportation and open spaces is a part of the programs called for in the Hollywood Community Plan. Also see Response 3-7 and Response 5-17. See detailed responses to specific comments below.

9-2 The proposed project is the update of an existing community plan to accommodate anticipated growth over the 19-year Plan horizon. In general, such anticipated growth is expected to have some impact. The goal of the proposed mitigation measures is to minimize the anticipated impacts to a level of insignificance.

Individual discretionary projects must be consistent with the General Plan. The proposed Hollywood Community Plan is a component of the Land Use Element of the General Plan.

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The approval of individual projects will be in the context of the Hollywood Community Plan's policies, goals, and programs. Community Plans provide guidance and relevant policy to decisionmakers. Specific standards and regulations may be implemented through site-specific zoning and creation of tailored overlay districts.

The majority of the land use changes are being proposed to maintain consistency between the land use designation and zone, to reflect existing land use and minimize land use conflicts. The impacts from these changes are not considered to be significant from a land use perspective. The proposed mitigation measures are meant to address potential impacts that were considered significant at the plan level and are designed to reduce those impacts to a less than significant level. Mitigation measures for other impact areas are included in the Draft EIR, including public services, utilities, transportation, air quality, noise, geology, cultural resources, and risk of upset. Subsequent discretionary project approvals relating to specific projects shall require additional environmental clearance, and additional mitigation measures may be imposed as appropriate.

- 9-3 Comments regarding the Proposed Plan's goals, objectives, and policies are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3. The commenter's suggestion that multiple-family-zoned and commercially-zoned properties adjacent to single family-zoned properties be restricted to a 30-foot height limit is noted. No specific subareas are referenced in the comment; however Subarea 13:6 of the Proposed Plan is likely one of the intended areas of reference. Staff is evaluating the height recommendation in this area and notes the recommendation, which will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 9-4 See Section 4 Corrections and Additions for page 4.7-15, for noise mitigation added to the Draft EIR.
- 9-5 The adequacy of parking is not an environmental impact issue addressed by CEQA unless lack of parking could result in other physical environmental impacts such as air quality impacts. Mobility policies M.1.90 through M.1.111 address parking issues.
- 9-6 The Proposed Plan includes policies supporting the inclusion of transportation demand strategies, as stated by the commenter, as part of discretionary project approvals. Commenter's request that all project approvals require a mandatory commuter management plan is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed plan. See Response MR-3.
- 9-7 The Proposed Plan does not change existing requirements for residential parking for new development. The comment regarding parking management plan is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response 9-6 and Response MR-3.
- 9-8 The comment is acknowledged. A change in Height District has been analyzed in the EIR for Subareas 1:1, 1:2, and 1:3, which increases the permitted FAR to 1.5:1 for consistency with citywide standards to accommodate economic growth in designated areas. Staff is re-evaluating this recommendation as part of revisions. The comment will be forwarded to decisionmakers for their consideration in taking action on the Proposed Plan.

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- 9-9 The comments regarding traffic along Barham Boulevard are noted. See Response 9-8. New development proposed in the area with significant impacts to existing traffic conditions will be subject to mitigation measures and review.
- 9-10 The Proposed Plan does not modify existing parking requirements for new development. See Response 9-5 above.
- 9-11 See response to comment 9-2, above.

The proposed project is the update of an existing community plan to accommodate anticipated growth over the 19-year Plan horizon, if it should occur. In general, such anticipated growth is expected to have some impact on public services. The goal of the proposed mitigation measures is to minimize the anticipated impacts to a less than significant level. However, it would not be possible to guarantee less than significant impacts from new development. As individual projects are proposed, project level review will lead to specific mitigation measures, as appropriate, which will mitigate any impacts to public services to a less than significant level.

- 9-12 The Draft EIR contains proposed mitigation measures in the Public Services Section 4.3 that address the upgrading and improvements of existing fire and police facilities and equipment (pages 4.3-5 to 4.3-6 for fire services mitigation measures, and page 4.3-12 for police services mitigation measures).
- 9-13 Comment noted. See response to comment 8-27.
- 9-14 Comment noted. The Transportation Improvement and Mitigation Program (TIMP), which was prepared as the transportation component of the Draft EIR, is designed to anticipate traffic impacts associated with planned future developments in the Hollywood Community Plan Area. A number of recommendations included in the TIMP are intended to mitigate increased traffic volume and reduce impacts. Plan policies relevant to mobility and transportation are listed on Page 4.5-21 of the Draft EIR. Furthermore, implementation of the TIMP is listed as one of the mitigation measures in Section 4.3 Public Services, under both Fire Protection Services and Police Protection Services, in order to address this issue.
- 9-15 See Response 9-14 above. The Proposed Plan directs growth primarily around transit infrastructure to minimize impacts on hillside streets and shift greater percentages of travel trips onto mass transit. The comment does not discuss specific geographic Subareas of proposed change. The response is acknowledged and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 9-16 See Response 9-14 above. The Proposed Plan's policies recognize that special events contribute to cut-through traffic on residential streets and diminished mobility. Individual events that require specific traffic mitigation measures, such as street closures to accommodate extra traffic, are usually reviewed on a case-by-case basis and applicable traffic control measures, which tend to be time specific and temporary, are put into effect as needed. Plan policy M.1.74 calls for increased messaging systems to alert motorists to congestion resulting from street closures and events.
- 9-17 Impacts to utility infrastructure are addressed in Section 4.4 Public Utilities and mitigation measures include expanding or upgrading existing utility facilities as needed. The impact on

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water pressure to meet the needs of fire fighters is addressed in Section 4.3 Public Services-Fire Protection Services, where the required fire flow by type of land use is indicated in Table 4.3-1. Mitigation measures include continuing to require adequate fire service capacity prior to the approval of proposed developments. This environmental clearance does not clear any specific project level development. Future development requiring discretionary action will be evaluated under project-level environmental clearance. All existing life safety and building code requirements are supported by the Proposed Plan.

- 9-18 The commenter states that the document is silent regarding the impacts of the Proposed Hollywood Community Plan on emergency management services. The Draft EIR discusses the impacts to Fire and Police protection services in terms of impact to response times due to increased traffic, (page 4.3-5, Operating Traffic Conditions for Fire Services and pages 4.3-11 to 4.3-12, Operating Traffic Conditions, for Police Services), and the TIMP is intended to reduce such traffic-related impacts. Also see response 9-14 above.
- 9-19 The Draft EIR includes a number of mitigation measures that address public services. These mitigation measures are listed in Section 4.3, Public Services (pages 4.3-5 to 4.3-6 for Fire Services, page 4.3-12 for Police Services, page 4.3-22 for Public Parks, pages 4.3-35 to 4.3-36 for Public Schools) and in Section 4.4, Utilities (page 4.4-9 for Water Resources, page 4.4-19 for Energy Resources, page 4.4-27 for Wastewater System, page 4.4-34 for Solid Waste Generation and Disposal). They are required by the EIR and enforcement is detailed in the Mitigation Monitoring and Reporting Plan included in this Final EIR.
- 9-20 Regarding funding, conducting a nexus study, and use of impact fees, see Response 3-7, Response 5-17, Response 9-1 and MR-2.
- 9-21 The commenter states that the proposed mitigations are inadequate due to lack of funding required to implement them and enforcement mechanisms to ensure compliance. In general, implementation of proposed mitigation measures will be funded from the City's General Fund, as part of each implementing department's annual budget, as the mitigation measures are incorporated into each implementing department's work program. In some instances, special fees may be charged to help fund the implementation of some of the mitigation measures, as appropriate and necessary.
- 9-22 Comment noted. While providing adequate water supply continues to be a concern, the City and LADWP are committed to providing residents with sufficient water for their needs. The Planning Department will continue to work with LADWP to ensure that residents receive adequate water supply, as feasible; for example, the water conservation measures recommended by LADWP as mitigation measures on individual projects have been included.
- 9-23 Comment noted. The proposed mitigation measures do include the promotion of energy conservation and the development and use of alternative sources of energy.
- 9-24 Comment noted. The proposed mitigation measures do include the implementation of existing conservation measures, incentives for development of new markets and uses for reclaimed water, rehabilitation of existing sewers, and the construction of relief sewers.
- 9-25 Comment noted. The proposed mitigation measures do include implementation of the Solid Waste Integrated Resources Plan, providing incentives for processing and marketing of

recyclable items, accelerating ongoing efforts to provide alternative solid waste treatment processes, and the expansion and establishment of landfill sites.

- 9-26 The comment stating that each of the proposed mitigations needs identified, dedicated, and durable funding sources and enforcement mechanisms is noted. Please see response to Comment 9-21, above, for a discussion of funding. As for enforcement, the Mitigation Monitoring and Reporting Plan that is contained in this Final EIR identifies which department or agency will be responsible for the implementation and monitoring of mitigation measures. Please also see MR-2.
- 9-27 The comment stating that the document does not attempt to propose reasonable and tangible mitigation measures, beyond implementation of Proposed Community Plan policies, to reduce traffic-related project impacts is noted. The Proposed Plan includes a TIMP that would reduce traffic related impacts. As noted on Page 4.5-25 of the Draft EIR, the TIMP includes various elements, including:
- Transportation System Management (TSM) Strategies
  - Transit Improvements
  - Non-Motorized Transportation
  - Transportation Demand Management (TDM) Strategies
  - Capital Improvements
  - Residential Neighborhood Traffic Management Plans

Programs and policies for each element are included in the TIMP. Since the TIMP is included as part of the Proposed Plan, the proposed mitigation measure to implement the applicable mobility policies of the Proposed Plan as applicable is considered both reasonable and tangible.

The Mobility policies of the Community Plan are designed to provide tangible mitigation for these impacts. In addition, City guidelines for traffic impact studies require project-specific studies for all developments that generate 500 or more daily trips or 43 or more PM peak hour trips. Such project-specific traffic studies include mitigation measures as feasible and appropriate to address impacts on a project-by-project basis.

- 9-28 See Corrections and Additions Section 4 of this Final EIR.
- 9-29 The commenter correctly cites the findings of the Draft EIR. The Hollywood Community Plan TIMP includes the following discussion beginning on page 69 to address the concerns about neighborhood traffic impacts:

“Several neighborhoods that have experienced neighborhood traffic intrusion and where additional attention should be paid to traffic calming measures include:

- Canyon routes and associated streets across the Hollywood Hills
- Neighborhoods between Franklin Avenue and Hollywood Boulevard
- Neighborhoods between Sunset and Hollywood Boulevards
- Neighborhoods between Sunset and Santa Monica Boulevards
- Neighborhoods between Santa Monica Boulevard and Melrose Avenue
- Neighborhoods between Franklin Ave and Mulholland Drive

- Neighborhood bounded by Hollywood Boulevard on the north, La Brea on the east, Fountain Avenue on the south and Laurel Canyon Boulevard on the west between Sunset and Hollywood Boulevards.

#### Traffic Control Measures

The types of neighborhood traffic control devices that have been used to regulate, warn and guide traffic in residential areas include the following:

- Diverters
- Semi-diverters or partial street closures
- Chokers (narrowing of the roadway)
- Turn Restrictions
- Turn Channelization
- Stop signs
- Traffic circles
- Speed humps
- Special pavement
- On-street Parking
- Bikeway Striping
- Warning or Advisory signs

Installation of certain types of traffic control devices such as stop signs, require satisfaction of specific criteria to justify their installation. The City must study conditions within the neighborhood to determine if the installation on such traffic control devices is warranted.”

- 9-30 The comment is consistent with the analysis in the Draft EIR. Barham Boulevard and Cahuenga Boulevards East and West are shown to be congested now and in the future.
- 9-31 The Draft EIR analysis confirms that Highland Avenue will be operating at LOS E/F indicating that drivers may seek alternate routes. See Response 9-29 with regard to measures on residential streets.
- 9-32 The Draft EIR analysis confirms that Laurel Canyon Boulevard, south of Mulholland, will be operating at LOS E/F indicating that drivers may seek alternate routes. See Response 9-29 with regard to measures on residential streets.
- 9-33 The comment with regard to emergency response time is acknowledged. The Draft EIR analysis confirms that traffic congestion will increase in the HCP area.
- 9-34 The Proposed Plan’s TIMP includes many measures intended to reduce vehicle trips and encourage alternate modes of transportation, but the Draft EIR does confirm and disclose that the level of vehicular trip generation will increase significantly as noted in this comment. The commenter’s opinion with regard to the need for reduced levels of development and the expediting of public transportation improvements will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 9-35 The Draft EIR discloses potentially significant impacts and attempts to fully mitigate them with a series of mitigation measures. The final decisionmakers must determine if the

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remaining impacts are acceptable given the positive aspects of the Proposed Plan, and must adopt a statement of overriding considerations.

- 9-36 The commenter's suggestion for a cap on trip-generation in Hollywood will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 9-37 The commenter references the need for additional financing measures to implement the Proposed Plan's policies and programs. See Response 3-7, Response 5-17, and Response 9-1 in regards to developing a nexus study and impact fee to fund improvements. The nexus study is a recommendation of the EIR rather than a mitigation measure; it would provide one method of ensuring all the improvements identified in the proposed Plan/TIMP are implemented. City guidelines for traffic impact studies require project-specific studies for all developments that generate 500 or more daily trips or 43 or more PM peak hour trips. Such project-specific traffic studies include mitigation measures as feasible and appropriate to address impacts on a project-by-project basis.
- 9-38 The comments are noted and corrections and additions are included in the Final EIR (see Section 4, Corrections and Additions) to address each street description more completely.
- 9-39 See Section 4, Corrections and Additions, page 4.5-5, for changes to the description of Barham Boulevard.
- 9-40 See Section 4, Corrections and Additions for page 4.5-3, for changes to the description of Hollywood Boulevard.
- 9-41 See Section 4, Corrections and Additions, pages 4.5-4 and 4.5-5, for changes to the descriptions of Fairfax and Fountain Avenues.
- 9-42 The commenter's opinion on the desired classifications of Fountain Avenue and Franklin Avenue will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 9-43 The commenter states support for additional use of peak-period turn restrictions to limit residential cut-through traffic. Peak-period turn restrictions are one type of measure included in the "tool box" of neighborhood traffic management measures. Please refer to Response 9-29.
- 9-44 The Community Plan identifies a number of bike lanes that are consistent with the adopted Bike Plan, which is part of the Transportation Element of the City's General Plan. The Community Plan does not amend the recently adopted Bike Plan. The Community Plan identifies a number of additional study corridors that reference the Bike Plan. See Response 5-18. For future implementation of bike lanes identified as study corridors, see Response 9-45.
- 9-45 As the City prepares to implement specific components of the Bicycle Plan in Hollywood, such as bike lanes, bike routes, or bicycle boulevards mentioned in this comment and as specific details of bicycle facilities are finalized, City staff will determine the appropriate level of environmental clearance required for each bicycle facility. The Department of Transportation and the Department of City Planning are coordinating a Five Year Implementation Plan as part of the Bicycle Plan, which is a separate adopted document. The

physical improvements associated with the Bicycle Plan in Hollywood have not been finalized and therefore cannot be addressed in detail in this EIR.

- 9-46 The suggested policy language in this comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

The Mobility policies of the Community Plan are designed to provide tangible mitigation for impacts to local streets. In addition, City guidelines for traffic impact studies require project-specific studies for all developments that generate 500 or more daily trips or 43 or more PM peak hour trips. Such project-specific traffic studies include mitigation measures as feasible and appropriate to address impacts on a project-by-project basis. The Hollywood Community Plan TIMP (Appendix C of the EIR) includes the following discussion beginning on page 69 to address the concerns about neighborhood traffic impacts:

In the Hollywood Community there is a predominance of local residential streets. As traffic volumes build up on the arterial street network, some drivers seek alternate routes on residential streets to avoid the arterial congestion. This is often referred to as "cut-through" traffic. Areas with grid system patterns of streets are particularly susceptible to cut-through traffic because the local streets are often parallel to major and secondary highways and provide convenient alternate routes. Similarly, areas with only limited arterial streets and collector streets connecting neighborhoods often experience cut-through traffic on those collectors when drivers look for alternate routes. Several of the neighborhoods in the Hollywood CPA experience commuter cut-through traffic daily and others experience cut-through traffic related to events at the Hollywood Bowl, Mann's Chinese Theater, and other popular Hollywood venues.

- 9-47 See Response 5-24.
- 9-48 See Response 5-20.
- 9-49 See Response 5-20.
- 9-50 Comment noted. See Responses 5-25 and 5-26. The Hollywood Plan Update Draft EIR addresses reasonably foreseeable noise impacts; site-specific noise impacts and project specific mitigation will be required as appropriate.
- 9-51 See Responses 5-26 through 5-28.
- 9-52 See Response 5-26.

**10. HHWNC Project Saving Grace, Rev. Robin Moreno, BSW Area 3 Chair HHWNC Program Director Project Saving Grace, May 31, 2011**

- 10-1 Comments regarding the proposed changes to Yucca Village, defined by the area bounded by Hollywood Blvd, Franklin Ave, Highland Ave, and Cahuenga Blvd, are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. A number of Subareas are contained within this general vicinity. No specific reference to areas of change is mentioned, but Subareas include 3:2B and 3:3. Subarea 3:2B proposes to eliminate a [Q] Qualifying condition that currently restricts the level of



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residential development below that permitted by the R4 density. The 60-foot height limit is retained, and parking requirements remain unchanged for new development. Comment regarding the existing inadequacy of parking is noted and will be forwarded to decisionmakers for their consideration in taking action on the Proposed Plan. Subarea 3:3 proposes to restrict new development to a height limit of 60 feet to be consistent with the adopted height limits to the north. A change in land use designation from High Density Residential to High Medium Density Residential is proposed. See also Response MR-3. The proposed Plan strategically accommodates growth in areas located near public transit and infrastructure to minimize carbon emissions. The TIMP also analyzes the impact of the Proposed Plan and identifies strategies and policies to manage and improve mobility and access. Please see Draft EIR Hollywood Transportation Improvement and Mitigation Program TIMP, Appendix C for recommended strategies and policies. See also Response to Letter 2 regarding development near freeways. Commenter's suggestion to visit the area during peak travel hours is noted and forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

**11. Hollywood United Neighborhood Council; Susan Swan, President, HUNC and David H. Schlesinger, PLUM Committee, HUNC, May 23, 2011**

- 11-1 The commenter expresses concerns regarding the length of time it has taken the Planning Department to prepare the Proposed Plan. The existing Hollywood Community Plan was adopted in 1988. The Proposed Plan has been in preparation since 2004. According to Government Code 65300 it is expected, although not required, that cities revise their General Plans every ten years.
- 11-2 The commenter's opinions are noted. See Response MR-3.
- 11-3 The comments pertaining to the utility infrastructure are noted. Maintenance and replacements of aging infrastructure is ongoing, and mitigation measures take that into account. On Page 4.4-9 of the Draft EIR, the mitigation measure for water resources states, "...to ensure appropriate expansion, upgrade and/or improvement of the local water distribution system within the CPA as may be necessary to accommodate anticipated growth," which includes water mains. On Page 4.4-19 of the Draft EIR, Mitigation Measure 5 for energy resources states, "Expand, upgrade, or improve local distribution lines and facilities within the community plan area whenever necessary to accommodate increased demand for energy." On Page 4.4-27 of the Draft EIR, Mitigation Measure 5 for the wastewater system states, "Rehabilitate existing sewers in poor structural condition and construct relief sewers to accommodate growth whenever necessary" and Mitigation Measure 6 states, "Expand or upgrade existing local sewers in the community plan area to accommodate increased wastewater flow whenever necessary." The Hollywood Community Plan includes a Mitigation Monitoring Plan, adopted with the Final EIR. See also, Response MR-2.
- 11-4 The commenter's opinions are noted, and will be forwarded to the decisionmakers for reference and their consideration in taking action on the Proposed Plan. Staff is refining the Community Plan recommendations in regards to land use and development intensities. See Response MR-3. See also Response MR-1 regarding population projections.

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- 12. Mid-City West Community Council, Jeff Jacobberger MCWCC Chair & Charles Lindenblatt MCWCC PLUC HCP-Draft EIR Working Group Chair, May 20, 2011**
- 12-1 See detailed responses below.
- 12-2 The commenter's support is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 12-3 See Response MR-3.
- 12-4 Comment noted. See Response MR-3.
- 12-5 See MR-3. The commenter's suggestion that the Alley Maintenance Plan proposed in Policy LU.1.25.1 should extend as far west as Orlando will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is refining text in the Community Plan and evaluating these suggestions.
- 12-6 The "difference of opinion" within the Mid-City West Neighborhood Council regarding "hybrid industrial zones" is noted.
- 12-7 The commenter's request for including a maximum height of 50 feet and appropriate scale transitions is noted and will be forwarded to the decisionmaker for their consideration in taking action on the proposed Plan. Staff is evaluating refinements to the Community Plan recommendations. See also Response MR-3.
- 12-8 The commenter's concerns regarding hybrid industrial zoning are noted and will be forwarded to the decisionmaker for their consideration in taking action on the Proposed Plan. Staff is evaluating refinements to the Community Plan policies. See also response MR-3.
- 12-9 The commenter's positions are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 12-10 The commenter's support, encouragement, and concern are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also MR-3.
- 12-11 The Draft Hollywood Community Plan Update aims for consistency with the Bicycle Plan by listing all of the proposed Bicycle Plan routes as study corridors (Policy M.1.47) in the Community Plan. As noted in Response 5-18, the timing of the two plans did not allow the Hollywood Community Plan EIR to environmentally clear all of those corridors. See also Response MR-3.
- 12-12 The neighborhood boundaries listed in Policy M1.87.2 are noted as "generally located between" the streets listed. Portions of Mid-City West are located between Santa Monica Boulevard and Melrose Avenue. Comment is acknowledged, and any neighborhood traffic management plan prepared for that area will consider the blocks immediately south of Melrose as well. Staff is evaluating refinements to the Community Plan policies in this regard. The Wilshire Community Plan begins south of Rosewood Avenue. See also Response MR-3.
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- 12-13 The commenter's suggestions regarding maintaining existing levels of fire station staffing, providing an infrastructure and public services report, and evaluating infrastructure levels are noted and will be forwarded to decisionmakers for their consideration in taking action on the Proposed Plan. Expansion and extension of service lines and facilities are recommended as demand increases. See also Response MR-2 and MR-3.
- 12-14 The commenter quotes a paragraph from the Draft EIR Summary which states that although the Proposed Plan would not potentially create land use conflicts, it could initiate changes in the intensity of residential land uses from lower density residential land uses to higher density residential land uses (page 2-3), and indicates that neighborhoods could be affected by the Proposed Plan and that significant efforts should be made to minimize those impacts. The EIR includes mitigation measures throughout designed to reduce impacts at the plan level. To the extent that land use impacts are reasonably foreseeable at the plan level they are anticipated to be less than significant. Additional review of discretionary projects will be undertaken as appropriate. The commenter's concerns are noted and will be forwarded to the decisionmaker for their consideration in taking action on the Proposed Plan.
- 12-15 See Response MR-1.
- 12-16 The commenters support of "adequate outreach" to notify property owners affected by the Proposed Plan is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating recommendations in regards to land use and development intensities.
- 12-17 As comments are submitted on the Plan they will be addressed by City staff and/or forwarded to decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 12-18 The commenter's support of maintaining existing housing stock is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 12-19 Comments noted. Mitigation measures will be funded from the general fund as part of the annual budgets of the relevant City departments, implementation through conditions on private development approvals (as may be appropriate) or (as noted in some of the mitigation measures) from impact fees. The Hollywood Community Plan EIR provides programmatic analysis. Project-level environmental analysis will be required for future discretionary project review
- 12-20 The changes in DASH service noted are acknowledged as is the comment that the City of Los Angeles does not control the level of service provided by Metro. See also Response MR-3.
- 12-21 The commenter's concern is noted and will be forwarded to the decisionmaker for their consideration in taking action on the Proposed Plan. See also Response MR-3.
- 12-22 See Response 12-19 above.

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**13. Sunland-Tujunga Neighborhood Council, Cindy Cleghorn, Secretary S-Tujunga NC/Land Use Committee Member, June 1, 2011**

- 13-1 Comment noted. See Responses MR-1 and MR-3 regarding the suggestion to include Census 2010 data.
- 13-2 The commenter identifies no specific concerns regarding the environmental analysis. The Draft EIR is a program EIR and programmatically evaluates impacts to public services, transportation, utilities, and other infrastructure. Future discretionary project approvals will require additional project-level environmental clearance, as appropriate, including project-specific mitigations for impacts to available infrastructure. See also Response MR-2.
- 13-3 Comment noted. Chapter 7 of the Proposed Plan includes design guidelines.
- 13-4 The commenter's position that poor planning is impacting infrastructure and recommendation to "not increase zoning in any areas" will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. No specific comments regarding the environmental analysis are made. The Draft EIR identifies areas of potentially significant environmental impact and recommends mitigation measures as appropriate. See also Responses MR-2 and MR-3.

**14. Cahuenga Pass Property Owners' Association, Bryce C. Lowery, President, June 1, 2011**

- 14-1 See Response 9-46 regarding impacts to neighborhood streets. Comment noted.
- 14-2 See Response 9-8 concerning increased density along Barham Boulevard. Staff is re-evaluating this recommendation as part of revisions. The comment will be forwarded to decisionmakers for their consideration in taking action on the Proposed Plan. The NBC/Universal Evolution Plan and MTA Universal Station Plan are not located in the boundaries of the CPA but have been included in the Transportation Improvement and Mitigation Program analysis due to the projected impact on traffic. See Draft EIR Section 4.5 Transportation and Appendix C TIMP.
- 14-3 The analysis does take into consideration these two proposed projects. Please see page 33 of the Hollywood Community Plan TIMP in Appendix C of the EIR for an explanation of the traffic forecasting approach to these two projects.
- 14-4 The street descriptions in the Draft EIR are brief descriptions of the general character of each Major and Secondary Highway, not block-by-block descriptions of each roadway. The block-by-block changes in the roadway characteristics are reflected in the traffic forecasting model. There was no attempt to "conflate" Cahuenga Boulevard West and Cahuenga Boulevard. The Draft EIR description notes that, "North of Odin Cahuenga transitions to three lanes northbound and one lane southbound to the Pilgrim Bridge and northbound US-101 on-ramp. North from the Pilgrim Bridge to Barham Boulevard, Cahuenga operates as two parallel streets on opposite sides of the US-101 freeway. Cahuenga East is a one-way northbound frontage road. Cahuenga West is a two-way street connecting Highland Avenue to Ventura Boulevard with one lane northbound and two lanes southbound."
- 14-5 See Response 14-4.

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- 14-6 The commenter’s opinion as to the appropriate classification for Cahuenga Boulevard West will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See MR-3.
- 14-7 See Section 4 Corrections and Additions, page 4.5-4, for the addition of a speed limit to the description of Cahuenga Boulevard West.
- 14-8 The Draft Hollywood Community proposes no changes to the Hollywood Signage Supplemental Use District, which was adopted in 2004, and amended to restrict supergraphics in 2010. The commenter’s concern about the proliferation of signage in Hollywood is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 14-9 Comments noted.

**15. Fix the City, James O’Sullivan, May 26, 2011**

- 15-1 In compliance with California State Law, the City of Los Angeles has adopted a General Plan with the requisite mandatory elements. Land use is one of the required elements of the General Plan. The City’s Land Use Element of the General Plan consists of 35 community plans (plus plans for the Port and Los Angeles International airport), of which the Hollywood Community Plan is one. The Hollywood Community Plan must be consistent with the provisions of the City’s General Plan. The City’s General Plan Framework Element, adopted in 1996, and updated in 2001, establishes development policy at a citywide level and each of the 35community plans enact the framework to guide development. The Hollywood Community Plan Update Program EIR has been prepared in compliance with CEQA and it’s Guidelines.
- 15-2 See Response MR-2 and MR-3.
- 15-3 The commenter asks about “trigger levels” to determine significant impacts on infrastructure. The Draft EIR analyzes impacts of the Proposed Plan on Public Services in Section 4.3 and Utilities in Section 4.4. The respective threshold of significance used to analyze each type of public service or utilities are presented under the subheading of “Impact Assessment” in each subsection. See also Response MR-2.
- 15-4 The baseline data for each factor for the base year 2005, which was when the NOP was prepared, were obtained from the relevant departments and entities. The baseline data for the Fire Protection Services were obtained from the Fire Department, the baseline data for the Police Protection Services were obtained from the Police Department, the baseline data for Public Parks were obtained from the Department of Recreation and Parks, the baseline data for Library Services were obtained from the Library Department, the baseline data for Public Schools were obtained from the Los Angeles Unified School District, and the baseline data for Transportation was based on data received from the Southern California Association of Governments. Also, see Response MR-2.
- 15-5 As explained in Response 15-1 above, the Hollywood Community Plan is one of the 35 community plans that comprise the Land Use Element of the City of Los Angeles General Plan. Adoption of the plan does not require the abandonment of General Plan required

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mitigations and policies. No required mitigations and policies are being abandoned. Upon adoption of the proposed plan, the prior 1988 Hollywood Community Plan will be updated with the new policies, land use designations, and zone changes analyzed in this environmental document.

- 15-6 See Response 15-5, above.
- 15-7 See Response 15-3. The thresholds used to determine if there is an impact in a given category are detailed in each of section.
- 15-8 Comment 15-8 is a repeat of Comment 15-4. Please see Response 15-4, above.
- 15-9 The Initial Study was prepared using the standard CEQA questions and thresholds used to prepare initial studies. See Response MR-2.
- 15-10 The EIR analyzes impacts of the generalized land uses and to the extent that other improvements are necessary they are analyzed to the extent they can be reasonably anticipated. Transportation modeling includes surrounding community assumptions as outlined in the TIMP. Other infrastructure analysis includes citywide data where available. As specific infrastructure (and other) projects move forward they will be subject to project-specific environmental review as appropriate.
- 15-11 The Hollywood Community Plan Update is consistent with the General Plan policies and mitigation measures.
- 15-12 This mitigation measure, which pertains to the identification of areas with deficient fire protection facilities and/or services and prioritizing the order in which they are upgraded, like the rest of the mitigation measures, shall be incorporated into on-going work programs, in order to minimize budgetary constraints.
- 15-13 See Response 15-12, above.
- 15-14 Commenter asks for clarification of the term “adequate” in the context of the fire service capacity. Adequate fire service capacity is reflected in the response times and overall level of service of fire fighting services. As stated in the introductory paragraph, under Existing Conditions (pages 4.3-1 and 4.3-2), fire protection services are provided pursuant to established standards that specify fire flow requirements, service radii, equipment, and personnel. An “adequate” service would mean being able to maintain the standards that have been set.
- 15-15 This mitigation measure, which pertains to implementing the TIMP contained in Section 4.5 of the DEIR to improve traffic conditions thereby improving fire and life safety in the community, shall be incorporated into on-going work programs. Discretionary project level review of development will require additional environmental analysis and the impositions of any required project level mitigations.
- 15-16 Please see Response 15-15, above.
- 15-17 The commenter asks for clarification of the term “sufficient.” The commenter is referring to Policy CF.5.17 of the Proposed Community Plan, which was listed on page 4.3-4 of the

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Draft EIR as a relevant policy, under the subtitle Relevant Policies of the Proposed Community Plan. While the actual terms used in the Proposed Community Plan and the Draft EIR might differ, the terms “adequate” and “sufficient” are generally listed as synonyms in dictionaries and thesauri. Therefore, the response to Comment 15-14 would apply: the term “sufficient” would mean being able to maintain the standards that have been set, which specify fire flow requirements, service radii, equipment, and personnel. The term sufficient is used in the context of an acceptable level of service, similar to the term “adequate.” See Response 15-14.

- 15-18 Maintaining “sufficient” levels of service and response times, as demand increase over time, would require upgrading or improving fire and police protection equipment or infrastructure. The DEIR analyzes impacts to the Hollywood Community Plan Area. The provision of sufficient levels of service and response times would not have a significant impact on surrounding communities per Section 6.6, Cumulative Impacts, pages 6-10 to 6-11. As noted by commenter, see Plan Policy CF. 5.19.
- 15-19 The comment regarding the mitigation policy to “Hire and deploy additional police officers...” is noted. DCP works in partnership with LAPD to determine how growth will affect levels of service and protection. If and when growth occurs and/or demand for police services increases, this mitigation shall be included in the existing operating plan of LAPD. See Response 7-1.
- 15-20 See Response 15-19 above.
- 15-21 The comment regarding the mitigation policy to upgrade police protection equipment and facilities in areas not receiving adequate police protection is noted. DCP works in partnership with LAPD to determine how growth will affect levels of service and protection. If and when growth occurs and/or demand for police services increases, this mitigation shall be included in the existing operating plan of LAPD. See Response 7-1.
- 15-22 See Response 15-21 above.
- 15-23 Comment noted. The commenter cites from the revised findings and statement of overriding considerations for the readopted Framework Element dated July 17, 2001, which states for Police, that the amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990) and that these impacts are potentially significant, as a preamble to subsequent comments. No response is required.
- 15-24 Comment noted. The commenter cites from the revised findings and statement of overriding considerations for the readopted Framework Element dated July 17, 2001, for Police, which pertains to the Framework Element’s economic development policy and the provision of adequate supporting infrastructure and public services, as a preamble to subsequent comments. No response is required.
- 15-25 Comment noted. The commenter cites from the revised findings and statement of overriding considerations for the readopted Framework Element dated July 17, 2001, for Police, which pertains to mitigation measures and significance, as a preamble to subsequent comments. No response is required.

- 15-26 The commenter asks if the Draft EIR studied the impact of a reduced City Attorney budget on public safety. The Draft EIR analyzed the impact of the Proposed Hollywood Community Plan update on the existing environment in the community plan area, on the existing infrastructure and public services, including police protection. The Proposed Project would not impact staffing levels at the City Attorney's office.
- 15-27 The commenter asks if the City Attorney "weighed in" on the ability to prosecute crime throughout the City. The City Attorney's office was notified of the preparation of the Proposed Plan and the Draft EIR and provided with opportunities to comment. Planning Department staff has worked in close cooperation with the City Attorney's office in the preparation of both documents.
- 15-28 Policies pertaining to library services contained in the Proposed Hollywood Community Plan are listed on Page 4.3-16 of the Draft EIR. Comparison of the baseline to projected service requirements is contained in the assessment section of the Draft EIR, on pages 4.3-17 and 4.3-18.
- 15-29 There are two "trigger levels" described under Threshold of Significance, on page 4.3-15 and 4.3-16 of the Draft EIR. They are: 1) the size of branch libraries, as established by the 2007 Branch Facilities Plan's guidelines, which recommend 12,500 square-foot facilities for communities with a population less than 45,000 and 14,500 square-foot facilities for communities with more than 45,000, regional branches of up to 20,000 square feet, and an additional branch library for communities with populations of 90,000; and 2) the State of California standard for public libraries, which requires 0.5 square foot of library space and two volumes of permanent collection per resident.
- 15-30 Mitigations regarding parks are listed on Page 4.3-22 of the Draft EIR. The general comment regarding park mitigations is noted. Mitigations shall be incorporated into the Recreation and Parks Department ongoing work program. Project-level environmental analysis shall be required for future discretionary development approvals and project-specific mitigations required, as appropriate.
- 15-31 The proposed mitigation measure cited in this comment reflects on-going City practices in which the Planning Department works in cooperation with LADWP as part of the review of individual projects to ensure that appropriate levels of water distribution systems are provided.
- 15-32 The comment regarding mitigations for energy resources is noted. These mitigations shall be incorporated into the ongoing work program for LADWP. As development occurs, incremental improvements and upgrades will take place under the direction of LADWP. Customer revenues throughout the life of the Proposed Plan will fund large-scale modernizations and maintenance.
- 15-33 See Response 15-32.
- 15-34 The commenter asks if the Draft EIR is consistent with the Hyperion Settlement. The comment does not raise any question regarding the adequacy of the EIR analysis. Legal settlement agreements between the City of Los Angeles and other parties are not analyzed by this environmental document. The comment shall be forwarded to the decisionmakers for further consideration in taking action on the Proposed Plan.



- 15-35 The comment references waste water mitigations. Implementation of these mitigation measures shall be incorporated into the ongoing work program of the related department. Customer revenues throughout the life of the Proposed Plan will fund modernizations and maintenance.
- 15-36 See Response 15-35.
- 15-37 The comment references solid waste mitigations. Implementation of these mitigation measures shall be incorporated into the ongoing work program of the related department. Customer revenues throughout the life of the Proposed Plan will fund modernizations and maintenance.
- 15-38 See Response 15-37.
- 15-39 This comment repeats text from the Draft EIR as a preamble to subsequent comments. No response is required.
- 15-40 The baseline for the travel demand-forecasting model was 2005 socioeconomic data provided by the Southern California Association of Governments. Census data from the 2000 Census was also used to characterize the travel patterns of residents in Hollywood.
- 15-41 See Response 15-40.
- 15-42 The primary transportation mitigation measure is to implement development review procedures to ensure that the applicable Mobility policies of the Hollywood Community Plan are applied and implemented by individual discretionary development projects when they are considered for approval in the plan area. Development review fees are set to provide full cost recovery for the services required to process developments, so this process should be self-supporting and not dependent upon City General Fund resources to proceed.
- 15-43 The data used in the Draft EIR was current as of the date the Notice of Preparation was published and the start of preparation of the analyses. See also Response MR-1.
- 15-44 The commenter presents mitigation measures for air quality from the Draft EIR as a preamble to other comments. No response required.
- 15-45 In accordance with CEQA the baseline for the EIR analysis is 2005, the year the NOP was published for the EIR. Updated information, especially concerning new regulations has been included as it became available during preparation of the Draft EIR. See also MR-1.
- 15-46 See Response 15-45.
- 15-47 Should the Proposed Plan be approved and the EIR certified, a Mitigation Monitoring and Reporting Program (included in this Final EIR) will also be approved that will allow for monitoring and enforcement of all mitigation measures. Only feasible measures are included in the EIR and therefore funding will be made available as appropriate, whether from the general fund, special funds or fees on private development.
- 15-48 See Responses 15-45 and MR-1.
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- 15-49 The commenter presents mitigation measures for noise from the Draft EIR as a preamble to other comments. No response required.
- 15-50 The commenter summarizes alternatives analyzed in the EIR as a preamble to other comments. No response required.
- 15-51 See Response 15-45. More current information than 2005 has been included as feasible and appropriate during the EIR preparation.
- 15-52 The comment regarding infrastructure challenges and aging systems is noted. Section 4-3 of the Draft EIR analyzes public services, including water resources. Customer revenues throughout the life of the Proposed Plan will fund modernizations and maintenance of water infrastructure. Also, See Response 15-31.
- 15-53 The comment regarding the evaluation of current data is noted. No specific question is raised regarding a data source or impact area. Please see Response MR-1 and the specific responses throughout 15-1 through 15-52.

**16. Franklin/Hollywood Blvd. West Homeowners' Association, Brandon Chapman & Don Andres, President, May 26, 2011**

- 16-1 The commenter's suggestion for the re-designation of Gardner Street and Franklin Avenue will be forwarded to policymakers for their consideration. See MR-3. It should be noted, however, that there is no roadway designation called "residential." The commenter's intent would appear to be a request for re-designation as Local Streets, rather than Collector or Secondary Highway. Staff is evaluating refinements to the Community Plan street designations in this area.
- 16-2 See Response 16-1.

**17. Friends of Griffith Park, Gerry Hans, President, May 31, 2011**

- 17-1 The commenter's observations regarding inadequate park acreage of community and neighborhood parkland and the fact that analysis was based on overall parkland totals are noted. While the Draft EIR does base its analysis on the existing overall total parkland acreages, as opposed to an analysis based on the three categories of parkland (regional, community, and neighborhood), it does acknowledge that the inclusion of Griffith Park skews the overall totals and the lack of adequate community and neighborhood parkland, in the Unavoidable Significant Adverse Impacts section, on page 4.3-22.

As stated on Page 4.3-18 of the Draft EIR, the Hollywood CPA has a total of nine community and neighborhood parks, which total 83.24 acres (plus seven small pocket parks, totaling an additional 2.76 acres). Table 4.3-8 (on page 4.3-19 of the Draft EIR), lists the individual parks, their classification (community, neighborhood, regional, mini park), acreage, etc. There are two community parks (Barnsdall Park and Recreation Center with 14.9 acres, and Wattles Garden Park, with 48.16 acres). The community parks acreage totals 63.06. The nine neighborhood parks range in acreage from 1.13 acres (Las Palmas Senior Citizen Center) to 6.21 acres (Poinsettia Recreation Center), and total 20.18 acres. A

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neighborhood park is generally one to 10 acres in size and a community park is generally 10 to 50 acres in size.

As stated on Page 4.3-18 of the Draft EIR, the recommended ratio of neighborhood parks and community parks to population is two acres of neighborhood parkland per 1,000 residents and two acres of community parkland per 1,000 residents, and six acres of regional parkland per 1,000 residents. According to these criteria, the Hollywood CPA, with its 63 acres of community parkland and 20 acres of neighborhood parkland, does not have sufficient neighborhood and community parkland for its residents. This fact is acknowledged in the Draft EIR, Public Services-Public Parks and is listed as an unavoidable significant adverse impact, on Page 4.3-22 of the Draft EIR.

Based on the 2005 estimated population of 224,426 residents, the Hollywood CPA would need approximately 449 acres of neighborhood parkland, approximately 449 acres of community parkland, and approximately 1,347 acres of regional parkland. The nearly 4,215 acre Griffith Park and the 134 acre Runyon Canyon Park, which are the two regional parks which serve the CPA, provides an average of 19 acres of regional parkland per resident, which is more than three times the required amount. However, the approximately 63 acres of community parkland means that there are 0.28 acres of community parkland per resident. And the approximately 20 acres of neighborhood parkland means that there are approximately 0.09 acres of neighborhood parkland per resident.

The commenter's request for an alternative plan, one which corrects rather than perpetuates the lack of parks and recreational facilities in the Hollywood Community Plan Area and which would conform to the standards set by the City's General Plan is also noted. The Hollywood Community Plan Area has a high level of development and land is not readily available for purchase and conversion into parks and recreational facilities at the community and neighborhood level. The Proposed Plan is one that has been designed for maximum balance between the various needs that must be taken into consideration. The Draft EIR takes the existing lack of adequate community and neighborhood parks into consideration and includes mitigation measures to address these deficiencies. For example, public parks mitigation measure #1 states, "[d]evelop City or private funding programs for the acquisition and construction of new Community and Neighborhood recreation and park facilities" and public parks mitigation measure #2 states, "[p]rioritize the implementation of recreation and park projects in parts of the CPA with the greatest existing deficiencies" (page 4.3-22).

- 17-2 The comment regarding CF.5.59 is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating revisions to the Plan policy regarding illumination of parklands in the regional park context per the comment. See Response MR-3.
- 17-3 The comment regarding CF.5.64 is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating revisions to this Plan policy regarding the use of the Headworks area of Griffith Park and encouraging passive park uses. See Response MR-3.
- 17-4 The comment regarding CF.5.66 is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating revisions to this Plan policy regarding equestrian and hiking trails. See Response MR-3.

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**18. Hollywood Chamber of Commerce, Leron Gubler, President & CEO, May 31, 2011**

- 18-1 Comments regarding the various urban design programs underway in Hollywood are acknowledged. The Proposed Plan includes Chapter 7, Urban Design Guidelines. These are guidelines, not requirements, to help inform future discretionary decisions and provide guidance to project applicants. None of the language in Chapter 7 is a required standard as the Proposed Plan policies are to be adopted as resolution, not ordinance. The commenter references other existing land use overlays that are not a part of this Proposed Plan. These comments will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 18-2 Chapter 7 of the Proposed Plan includes urban design guidelines. These are general in nature, not prescriptive standards, and will be used to guide discretionary review of projects. See Response 18-1.
- 18-3 The commenter references the Modified Parking Requirements (MPR) Districts ordinance currently under discussion by the City Council. The commenter's suggestion that a modified parking requirement district should be initiated for the Hollywood CPA will be forwarded to the decisionmakers for their consideration.
- 18-4 The comment regarding consistency in scale of development in multifamily residential areas is noted and will be forwarded to the decisionmakers for their consideration in taking action in the Proposed Plan. See Response MR-3.
- 18-5 The comment regarding the requirement of mixed-use development along selected incentivized corridors is noted. Staff is evaluating revisions to the qualifying levels of commercial and residential development achieving the mixed-use development incentive. See Response MR-3.
- 18-6 The commenter's support for the El Centro Residential Area is noted. Commenter's general statement that urban design regulations in this area would encumber development will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 18-7 The commenter's critique of the existing Station Neighborhood Area Plan in the Vermont/Western area is noted. The Proposed Plan references the allowable density levels per this pre-existing ordinance. The request for further review will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 18-8 The comment regarding existing and proposed "D" Development Limitations is noted. All "D" Development Limitations affected by this plan are listed in the "Draft 'Q' Qualifying Conditions and 'D' Development Limitations Matrix" included as in Appendix A of the EIR. See Response MR-3.
- 18-9 The comment regarding tinted glass is noted. See Response MR-3.
- 18-10 The comment regarding windows facing windows is noted. See Response MR-3.

- 18-11 The comment regarding the policy limiting the number of Sign Districts in Hollywood is noted. See Response MR-3.
- 18-12 The comment regarding the integration of the Proposed Plan and the Bike Plan is acknowledged. Staff is evaluating revisions to the policy to reflect the recently adopted Bike Plan. See Response MR-3.
- 18-13 Comment noted, see revised language for Mitigation Measure 1 in Section 4, Corrections and Additions for page 4.10-6.
- 18-14 Comment noted. See Section 4, Corrections and Additions for page 4.10-6 and Mitigation Measures 1 and 2.
- 18-15 The methodology used to forecast future trips in the Hollywood Community Plan area is consistent with the methodology used to forecast trips in planning studies throughout southern California, as it utilizes the Southern California Association of Governments regional database and regional travel demand-forecasting model. Population and employment statistics were developed for each Traffic Analysis Zone (TAZ) in the model to reflect the land use plan alternatives under consideration. The employment data is broken down by employment type to reflect the various trip generation characteristics of the land uses noted in the comment. As noted on page 4.5-36 of the Draft EIR, the Metro/Universal and Universal Vision Plan (now called Evolution Plan) were reflected in the model. The commenter is referred to the SCAG website (<http://scag.ca.gov/modeling/>) for additional details on the travel demand forecasting model.
- 18-16 Assumptions used to determine a reasonable level of development under the 2030 Proposed Plan is provided in Chapter 4.2 of the Draft EIR on pages 4.2-2 and 4.2-3. A sample calculation of reasonably expected population is provided on page 4.2-3. Given Hollywood's existing built environment, historic structures and districts, and various development limitations and site constraints, it would be infeasible and unreasonable to expect all parcels to be built out at the maximum density during the life of the plan.
- 18-17 The Proposed Project is the updating of the existing Community Plan. During the preparation of the Initial Study, it was determined that the Proposed Project would not have a substantial adverse effect on aesthetics. While there are FAR and height increases included in the Proposed Plan, the updating of the Community Plan is not anticipated to have a significant impact. As the updated plan is implemented, however, individual projects requesting discretionary approvals will be reviewed on a project-by-project basis to ensure compliance with design guidelines. Any impacts to aesthetics will then be analyzed and mitigated to the extent possible.
- 18-18 Comment acknowledged. The Draft EIR is programmatic in nature since it addresses a planning document and not specific development proposed on a given site. Planning documents provide general guidance for future development. This planning guidance together with other factors including economic forces shapes development in the community. Since the exact nature of future development is not reasonably foreseeable the generalized programmatic analysis presented in the EIR is appropriate for this planning document. Project specific environmental review will be conducted for specific development proposals as appropriate.

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**19. Brown/Meshul Inc., on behalf of Hollywood Community Housing Corporation, Mark Brown, President, June 1, 2011**

- 19-1 The commenter refers to SA 9:2. The proposed zone change, from High Residential to Low Medium II Residential, is intended to “rescale density and height district to protect historic bungalow courts and apartments.”
- 19-2 Comment noted. See Response MR-3.
- 19-3 The Hollywood Community Plan Update EIR analyzes the impacts of the proposed HCP. Individual projects are not addressed in the EIR.
- 19-4 See Response 19-3.
- 19-5 Comment noted. The Draft Hollywood Community Plan Update proposes land use policies to preserve and promote affordable housing in Hollywood. The Draft EIR Section 4.2 Population, Employment, and Housing, page 4.2-1, addresses the impact of the proposed Plan to the existing housing stock and expected demand. See Response MR-3.
- 19-6 The comments addressing properties in SA 9:2 are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is evaluating land use recommendations. See Response MR-3.

**20. Hollywood Heritage Inc., Richard Adkins, President, May 5, 2011**

- 20-1 Comment noted. See response to Comment 20-6.
- 20-2 The comments below request that the Hollywood Community Plan include more information regarding existing conditions and proposed uses within the Plan area, specifically with regard to historical resources.
- a) The comment requests a map of current land uses and development intensities in the Plan area. The Community Plan does not include a current inventory of land uses for each parcel within the plan area or current existing development intensity map; these are not required for the purposes of the Community Plan and are not reasonably feasible to produce for such a large area. Comprehensive information, including zoning, planned land use intensities, and land use designations for specific parcels, is available on the City Planning Department’s ZIMAS website <http://zimas.lacity.org>.
  - b) The comment requests the inclusion of a comprehensive list of designated and eligible historical resources in the Plan area. The Community Plan includes a Designated Historic-Cultural Monuments list (Appendix Table 1); this table will be updated to include all individual resources and districts listed in the National Register, California Register, and local Historic-Cultural Monuments and Historic Preservation Overlay Zones (HPOZs). See also the revised Table 4.9-1 in Section 4, Corrections and Additions, in this Final EIR.

The comment also requests that potential historic resources identified in the recent surveys of Hollywood completed by the Community Redevelopment Area and SurveyLA be identified in the Draft EIR and Community Plan. Final data from these

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surveys are not available at this time to be incorporated into the EIR or Community Plan. Findings are in draft format and undergoing formal review processes that include public hearings. The City Planning Department has added information to the Final EIR and will add information to the Community Plan, regarding access to finalized SurveyLA findings and contact information for the CRA (see Corrections and Additions for page 4.9-20).

- c) The comment requests a comprehensive map of designated and eligible resources be added to the Community Plan. Staff is preparing a revised map to be included in the Community Plan illustrating the location of the designated resources listed in Appendix Table 1 (as revised). The map will not include draft data from SurveyLA or the CRA survey of Hollywood. Final data from these surveys are not available at this time to be incorporated into the EIR or Community Plan. Findings are in draft format and undergoing formal review processes that include public hearings. Staff has added information to the Final EIR and will add information to the Community Plan, regarding access to finalized SurveyLA findings and contact information for the CRA (see Corrections and Additions for page 4.9-20).
- d) The comment requests a current zoning map and proposed Community Plan land use map be included in the Community Plan. Current zoning information is available online at the parcel level at <http://zimas.lacity.org>. Existing and proposed land use designations for all change areas are outlined in the Land Use Change Matrix included as an appendix to the EIR. For ease of research, staff has compiled the requested proposed Community Plan land use map as an additional appendix (see Section 4, Corrections and Additions for the EIR Appendix).
- e) The comment requests a land use conflicts maps be added to the plan. It is assumed for the purposes of this response, although not stated, that the intent of such a map would be to identify areas where the current existing use is either less intense or more intense than the proposed development intensity zoning of the plan. Staff has prepared a map overlaying the location of designated resources within the plan area and showing the relationship of these resources to the proposed areas of change in the Community Plan. Figure 4.9-5a has been added to the Final EIR and shows designated resources and boundaries of proposed Subareas of change (see Section 4 Corrections and Additions for Cultural Resources). See subparagraph (a) of this response in relation to providing existing built land use and intensity data at the parcel level.
- f) The comment relates to mapping potential neighborhood districts. The Community Plan includes a map of Existing and Proposed Historic Preservation Overlay Zones (Map 15). The map does not include draft data from SurveyLA or the CRA survey of Hollywood. Final data from these surveys are not available at this time to be incorporated into the EIR or Community Plan. Findings are in draft format and undergoing formal review processes that includes public hearings. The City Planning Department has added information to the Final EIR (see Section 4 Corrections and Additions for page 4.9-20), and will add information to the Community Plan, regarding access to finalized SurveyLA findings and contact information for the CRA.

20-3 Comments regarding the importance of the Hollywood Boulevard Commercial District are noted. The district has not been resurveyed as part of the Hollywood Community Plan Update. The comment will be forwarded to the decisionmakers for their consideration in

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taking action on the Proposed Plan. All permits for projects within the Hollywood Boulevard Commercial District, whether affecting a contributing or a non-contributing property to the district, are already flagged for review and clearance by the Office of Historic Resources. All proposed projects within the district that include a discretionary action or actions will undergo environmental review on a project-by-project basis. This review will include any potential impacts to historical resources constructed after the district's period of significance. Environmental review will analyze potential impacts to individual historical resources as well as the district as a whole.

20-4 Comment 20-4 requests clear implementation of the Plan's Goals and Objectives with regard to the protection of historic resources.

- a) Staff is evaluating revisions to the Community Plan policies and programs to include the future study of a Transfer of Floor Area Ratios (TFAR) ordinance (in Hollywood). The requested addition of a policy to develop a Transfer of Development Rights (TDRs) program as a preservation tool is acknowledged.
- b) The City Planning Department does not regulate the demolition process of any building 50 years old or older with approved plans for development, except in cases where environmental review is triggered by a discretionary action. The suggestion to require coordination in these cases will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- c) The Hollywood Community Plan includes a policy to promote use of the Secretary of the Interior's Standards and Guidelines for all rehabilitation projects involving designated historic resources (LU.1.12). The Office of Historic Resources staff provides technical advice and assistance on the application of the Standards.
- d) The Hollywood Community Plan includes a policy that promotes the use of Federal Investment Tax Credit program in the rehabilitation of properties listed in, or determined eligible for listing in, the National Register (LU.1.16).
- e) Staff is evaluating revisions to the Plan policies to add a policy to the Hollywood Community Plan to improve and streamline the building permit process and ensure compatible rehabilitation of historic resources by providing early technical advice and assistance from the staff of City Planning, Building and Safety, and the Community Redevelopment Agency.

20-5 The comment discusses "D" Development Limitations and assumes their removal from the Hollywood Community Plan. The City Planning Department is not proposing to remove all "D" Development Limitations as part of the Plan. The comment critiques building height limits for Hollywood Boulevard and adjacent residential neighborhoods. The Draft "Q" Qualifying Condition and "D" Development Limitation Matrix outlines the existing and proposed "D" limitations for all areas of change, including all existing and proposed height limits for areas of change. The referenced 45-foot height limit for the central portion of Hollywood Boulevard is currently in place and not proposed for change. The referenced 150-foot height limit for the portion of Hollywood Boulevard between Highland and La Brea is not accurate, and this area is not proposed for any changes as part of the Hollywood Community Plan. No height limit is currently in place for the majority of these properties, and no changes are proposed to any frontages along Hollywood Boulevard within this block.



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All proposed discretionary projects within the Hollywood Community Plan area will be reviewed for potential impacts to historical resources. All projects affecting City Historic-Cultural Monuments are discretionary under the Cultural Heritage Ordinance.

Creating height limits based on current building heights would create a patchwork of zoning designations for any given block and could be perceived as impermissible “spot zoning”; however, all proposed discretionary projects will be reviewed for potential impacts to historical resources, which include consideration of appropriate height and density. The commenter’s request for additional land use regulations for residential neighborhoods, including the regulation of lot assembly, setbacks, and lot coverage are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

- 20-6 The comment discusses mitigation measures relating to historical resources. The City Planning Department does not regulate the demolition process of any building 45 years old or older with approved plans for development, except in cases where environmental review is triggered by a discretionary action. This regulation is a broader policy discussion that is beyond the scope of the Hollywood Community Plan and would require development and preparation of a separate ordinance, including an extensive public process. While not now proposing to develop a technical assistance program, staff is evaluating revisions to the Plan policies to add a policy to the Hollywood Community Plan to ensure compatible rehabilitation of historic resources by providing early technical advice and assistance from the staff of City Planning, Building and Safety, and the Community Redevelopment Agency. The Plan already includes a policy to promote use of the Secretary of the Interior’s Standards and Guidelines for all rehabilitation projects involving historical resources (LU.1.12).
- 20-7 The comment relates to inclusion of a preservation alternative to the project. This is a plan-level EIR. There is no feasible preservation alternative available that would lessen the impacts to historical resources at a plan level. Even the “no project” alternative could have significant impacts to historical resources as it would allow new development to occur, subject to the provisions of the existing Community Plan, that could have an adverse effect on historical resources within the plan area. As part of the Hollywood Community Plan Update, the City Planning Department considered and rejected as infeasible an alternative that would place a blanket moratorium on demolition permits and project development.
- 20-8 The comment relates to inclusion of a technical report to assess impacts to historical resources. This is a plan-level EIR. Specific impacts to historical resources on a parcel-by-parcel basis cannot be reasonably foreseen in such way that can be studied in a technical report at this time. Technical reports analyzing potential impacts to historical resources will be required on a project-by-project basis when environmental review is triggered by a discretionary action.
- 20-9 The comment states conclusions to topics referenced throughout the letter. Commenter requests greater coordination between the Planning Department and CRA. Comments noted. See Response 20-1 through 20-8. See also Response 18-18. The commenter does not identify how a Preservation Alternative would differ from the Proposed Plan. The Proposed Plan encourages preservation; individual projects that have the potential to impact historic resources would be reviewed against these policies as well as being subject to individual project review.

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**21. Hollywood Knolls Community Club, Daniel Savage, President, June 1, 2011**

- 21-1 The comment addressing proposed zone changes in subareas is noted. Staff is currently evaluating revisions to land use recommendations in this area. See also Response MR-3.
- 21-2 The Hollywood TIMP anticipates traffic impacts associated with the Proposed Plan. The TIMP can be found in Appendix C of the Draft EIR. The TIMP and Draft EIR include mitigation measures and recommend policies to improve access and mobility in Hollywood. See Draft EIR Section 4.5 Transportation, page 4.5-21.
- 21-3 The Draft EIR confirms the level of congestion in the Cahuenga Pass noted in the comment (See Figure 4.5-2). The Draft EIR also documents the increased levels of congestion associated with the proposed land use plan. Appendix A of the Hollywood Community Plan Update Transportation Improvement Mitigation Program (TIMP) lists the volume-to-capacity ratios and levels of service on roadways in the Cahuenga Pass and discloses the traffic impacts of the proposed plan. See also Response 21-2.
- 21-4 The Hollywood TIMP recommends strategies for increased parking demand in Section 4.2.6 Neighborhood Traffic Management Strategies, page 72 Parking Policies. The mitigation measures and policies recommended in the TIMP and Proposed Plan seek to promote alternative modes of transportation, highlighting the use of existing transit infrastructure. Individual projects with significant impacts to existing traffic and parking will be subject to review and mitigation measures.
- 21-5 See Response 18-17. As the updated plan is implemented, individual discretionary projects will be reviewed on a project-by-project basis to ensure compliance with design guidelines. Any impacts to aesthetics will then be analyzed and mitigated to the extent possible.
- 21-6 The Hollywood Community Plan Area is a predominantly urbanized, developed area and it was determined, during the preparation of the Initial Study, that the Proposed Project (the updating of the Hollywood Community Plan) would not have a substantial adverse effect on biological resources. As the updated plan is implemented, however, individual projects will be reviewed on a project-by-project basis for any impacts to biological resources, and any site-specific impacts to biological resources will be analyzed and mitigated as appropriate.
- 21-7 The comment pertains to Subarea SA1.1. The commenter expresses concern that increased density at this site would add to existing problems with traffic, noise, air pollution, and visual blight already present at this site due to an existing car repair business in an otherwise residential neighborhood. Land use and density changes at various sites were proposed only after much study and analysis following the purposes identified in the Land Use section of the Draft EIR. Under the Proposed Plan, SA1.1 would retain its existing land use designation of Limited Commercial but will have its Height District (HD) restored to the full Floor Area Ratio (FAR) allowed by HD 1 to accommodate economic growth, as stated in the Draft Matrix of Land Uses (Appendix A.5 of the Draft EIR). The commenter's concerns regarding potential impacts of the proposed land use change in SubArea 1:1 on traffic, noise, air pollution, and visual blight are noted. The Draft EIR analyzes traffic, noise, and air pollution impacts at a programmatic level in Chapters 4.5, 4.7 and 4.6 respectively. Site-specific issues will be addressed in detail at the project level, as appropriate, as projects are proposed and reviewed. The commenter's concerns regarding visual blight will be

forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

21-8 The Hollywood Community Plan TIMP acknowledges the impacts of “cut through” traffic on residential streets and includes recommendations for additional neighborhood traffic management programs in the Plan area, specifically citing canyon routes and associated streets across the Hollywood Hills, including those referenced in this comment.

21-9 Comment noted. SA1.2 will retain its existing land use designation of Limited Commercial and have its zone changed. As stated in Response 21.7, land use and density changes at various sites were proposed only after much study and analysis, for purposes identified in the Land Use section of the Draft EIR. See also Response MR-3.

The commenter’s concerns regarding potential impacts of proposed land use change in SubArea 1:1 on traffic, noise, air pollution, and visual blight are noted. The Draft EIR analyzes traffic, noise, and air pollution impacts in Chapters 4.5, 4.7 and 4.6 respectively. The commenter’s concerns regarding visual blight will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

21-10 The Proposed Plan would not change the existing office building referenced in this comment nor affect the New York Film Academy and its students. The existing conditions associated with those facilities would be unchanged by the Plan. The boundaries of SubArea 1:3 will be corrected. Commenter’s opinions regarding increased density in SubArea 1:3 are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is currently evaluating revisions to land use recommendations in this area. See also Response MR-3.

21-11 Comments noted. The commenter’s opinions will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also response MR-3.

**22. Los Angeles Conservancy, Adrian Scott Fine, Director of Advocacy, June 1, 2011**

22-1 Comments noted.

22-2: The comment requests that a map locating identified historical resources be added to the Community Plan and that this map include an overlay illustrating development goals and land uses. The Community Plan currently includes a Designated Historic-Cultural Monuments list (Appendix Table 1); this list will be updated to include all individual resources and districts listed in the National Register, California Register and as local Historic-Cultural Monuments and Historic Preservation Overlay Zones (HPOZs). The map illustrating the location of these designated resources and showing the relationship of these resources to the proposed area of change in the Community Plan is added to the Final EIR (see Section 4 Corrections and Additions for Cultural Resources and the additions of Figure 4.9-5a-h).

The Hollywood Community Plan Draft EIR includes a statement regarding the fact that inventories of designated resources are continually updated by the inclusion of new resources and that no one list should be considered definitive. Staff is revising the plan policy text to add a similar statement to the Community Plan including contact information

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within the department for the most up-to-date survey information. In addition, the effective date will be added to the designated historic resources list and map.

- 22-3 The comment requests that potential historic resources identified in the recent surveys of Hollywood completed by the Community Redevelopment Area and SurveyLA be included and mapped in the EIR and Proposed Plan. Final data from these surveys are not available at this time to be incorporated into the EIR or Community Plan. Findings are in draft format and undergoing formal review processes that includes public hearings. See Section 4 Corrections and Additions for page 4.9-20 regarding access to finalized SurveyLA findings and contact information for the CRA.
- 22-4 The comment requests greater clarity in the analysis of potential impacts of the Community Plan to historical resources. This is a programmatic plan-level EIR. Specific impacts to historical resources on a parcel-by-parcel basis cannot be reasonably foreseen in such way that can be studied in a technical report at this time. Technical reports analyzing potential impacts to historical resources will be required on a project-by-project basis when environmental review is triggered by a discretionary action.
- 22-5 Comment requests the inclusion of at least one preservation alternative to the Draft EIR. See Response 20-7. This is a programmatic plan-level EIR. No feasible preservation alternatives are available that would lessen the impacts to historical resources at a plan level. Even the “no project” alternative could still have significant impacts to historical resources as it would allow new development to occur, subject to the provisions of the existing Community Plan, which could result in an adverse effect on historical resources within the plan area. As part of the Proposed Plan, the City Planning Department considered and rejected as infeasible an alternative that would place a blanket moratorium on demolition permits and project development.
- 22-6 Comments noted. See Responses 22-3 and MR-3.

**23. LA Willoughby Coalition, Lucille Saunders, President, June 1, 2011**

- 23-1 The commenter identifies areas of interest. See responses below.
- 23-2 Comments requesting changes to subareas are noted and will be forwarded to the decisionmakers for further review. The Hollywood Community Plan includes Program LU.3.18.1 to develop a streetscape plan for La Brea Avenue as requested. Staff is evaluating revisions to land use recommendations, including evaluation of height. See Response MR-3.
- 23-3 Comments noted. See MR-3. The Hollywood Community Plan Update EIR is a programmatic document that addresses impacts at a community level, not at a site-specific level. As individual discretionary projects on individual sites are proposed, impacts will be specifically assessed and mitigated through the discretionary review process, as appropriate.
- 23-4 The commenter indicates that the Proposed Plan should address current infrastructure issues before allowing increased density. The Hollywood DEIR analyzes impacts to public services and infrastructure that are expected over the life of the Proposed Plan. This Final EIR includes the Mitigation Monitoring and Reporting Plan (see Section 5), that identifies which agencies and city departments are responsible for implementing the proposed mitigation measures. The commenter expresses concerns about water and power

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infrastructure. The Draft EIR analyzes the impact of the Proposed Plan on water resources and energy resources in Section 4.4. See Response 48-17 for a discussion of DWP's Power Reliability Program. Please also see Response MR-2.

As stated in the Introduction Chapter of the Draft EIR, (Page 1-1), existing community plans, their land use policies, and programs are evaluated and revised as appropriate during the community plan update process.

- 23-5 Comment noted. As noted in 4.3 Public Services-Police Protection Services section, under existing conditions (Page 4.3-6 of the Draft EIR), the LAPD is divided into four Police Station Bureaus, each of which encompasses several communities. The Hollywood CPA is within the jurisdiction of LAPD's West Bureau, which also has jurisdiction over the Wilshire CPA. However, for purposes of the Draft EIR, only data for the Hollywood CPA were considered.
- 23-6 Comment noted. Please see Response MR-2. The Draft EIR analyzes the overall environmental aspects of the Proposed Plan at a community level. As individual projects on individual sites are proposed, the existing conditions at those particular sites will be determined and any impacts will be addressed.
- 23-7 The commenter quotes transportation programs from Chapter 10 - Implementation Programs of the General Plan Framework, not the Draft EIR. The General Plan Framework is an adopted element of the General Plan. As stated in Chapter 10, the decisionmakers determine how best to implement adopted policies of the General Plan to serve the public health, safety, and general welfare. Program implementation is contingent on the availability of adequate funding, priorities, and other conditions. The Hollywood TIMP examines existing transportation conditions and identifies needed transportation programs to accommodate projected growth in the area. The policies proposed in the Plan are based on the recommendations of the TIMP and are intended to improve mobility and access in the Hollywood Plan Area. For policies regarding accessibility, please refer to Hollywood Community Plan Chapter 4 Mobility Plan and Draft EIR Appendix C TIMP. The TIMP also defines traffic management strategies; see TIMP Section 4.2.1 Transportation Systems Management Strategies, page 51. The comment regarding highway segments is noted; see also Response MR-3.
- 23-8 Comment noted. The Proposed Plan accommodates future growth and is meant to guide development as it occurs. Staff is evaluating land use recommendations in this area, including height. See also Response MR-1.
- 23-9 The commenter expresses concerns regarding the proximity of industrial and residential uses which are proposed in hybrid industrial zones south of Romaine and east of Formosa, SubAreas 39:3 and 39:4. The Hollywood Community Plan Update restricts the offer of Floor Area Ratio Incentives to hybrid industrial projects which incorporate media-related industrial uses only. Adjacent residential uses are zoned Medium Residential multifamily, a designation that is compatible with media-related uses. The commenter's opinions will be forwarded to the decisionmakers for their consideration. See also Response MR-3. The commenter refers to SA 39:3 and 39:4 which is proposed to be zoned as Commercial Manufacturing with "Q" qualified conditions that prohibit "Residential Only" projects and provide a "Hybrid Industrial Incentive." The Plan seeks to preserve media related industrial

uses in the area bordering the Media District. Individual discretionary projects will be reviewed on a case-by-case basis subject to project-level environmental analysis.

23-10 Commenter voices concerns regarding loss of industrial land in SubAreas 39:3 and 39:4, and in the Hollywood Community Plan area. The proposed change from MR1-1 to [Q]CM-2D allows industrial uses. The Hollywood Community Plan Update intends to balance multiple goals. In SubAreas 21 and 22:1 the Hollywood Community Plan Update proposes to rezone industrial land as Public Facilities to reflect current use by new public schools. Commenter's opinions will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 23-9 and MR-3.

23-11 The commenter's opposition to the rezoning of existing industrial zones lands in the area as part of the Hollywood Community Plan Update is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3. It is not intended nor anticipated that the Proposed Plan would foster more "bedroom communities," through the use of industrial incentives; rather, the proposed policies seek to promote "jobs-housing balance," HCP Chapter 3 Land Use Plan page 76.

Comments regarding changes in land use designations are noted. Individual projects requiring discretionary approval on land previously zoned industrial would be subject to environmental review and mitigation. The Draft EIR does not address economic impacts, as this is not a topic addressed by CEQA.

The impacts of land use and zone changes proposed are analyzed in Draft EIR Section 4.1 Land Use, page 4.1-1. Specific description of SA 39.3 and 39.4, mentioned above, can be found on page 4.1-33 of the Draft EIR.

Comments regarding "by right" development projects are noted. Individual projects must comply with the development standards of the City and may be subject to review.

23-12 The commenter expresses concerns that the Draft EIR has not considered possible hazards involved in rezoning industrial land for other uses. This EIR is a programmatic environmental analysis. Project level environmental analysis will analyze possible impacts of future discretionary development on rezoned industrial land, including the risk of hazardous materials.

The commenter expresses concerns that the Draft EIR has not conducted a cost-benefit analysis regarding rezoning of industrial land. The purpose of the subject environmental analysis is to assess the impact of the proposed Hollywood Community Plan on the environment. The comment regarding economic cost-benefit analysis is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

The commenter expresses concerns that the Draft EIR does not propose mitigation measures for potential impacts of proposed zone changes in proposed hybrid industrial areas. The commenter states that with such implementation measures and mitigations, unavoidable significant adverse impacts would be mitigated. The Draft EIR proposes feasible mitigations at the programmatic level for the community plan update. Environmental analysis of impacts at the project level shall be made through project-level environmental clearance of discretionary project approvals, including development in the proposed hybrid industrial

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areas. All unavoidable significant adverse impacts of the proposed plan are identified in Section 4 of the DEIR and summarized on Page 6-3 of the Draft EIR. .

The commenter raises concerns that density increases proposed by the Proposed Plan will eliminate requirements for parking, open space, landscaping and dedications. The Plan does not propose changes to parking requirements, open space requirements, and landscaping requirements. Required street dedications, and the width of required sidewalks, may be modified from current standards as outlined in the proposed Draft Hollywood Street Standard re-designations. All proposed changes are described in the Draft Hollywood Community Plan Update, the Draft Matrix of Existing, Planned and Proposed Land Use, the Draft “Q” Qualified Condition and “D” Development Limitation Appendix, the Draft Land Use and Zone Change Map, the Draft Qualified Conditions and the Draft Modified Street Standards.

The commenter raises U.S. Census Bureau data for census tracts in the identified La Brea Willoughby Coalition Neighborhood Map area, including the concern that projected growth rates are inflated. Comment is acknowledged and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Please see Response MR-1. See also Responses MR-2 and MR-1.

- 23-13 The comments concerning implementation of the General Plan Framework are noted. The Proposed Plan’s changes in land use designations and zone changes reflect SCAG and City 2030 population estimates. The proposed policies of the Plan do not intend to promote growth, rather accommodate growth if and when it occurs, based on available data. The commenter includes an excerpt from a private party regarding the concept of growth neutrality, comment is noted and quotes the Executive Summary of the Framework Element of the General Plan. Infrastructure and public services respond to growth as it occurs; City departments monitor growth and determine schedules for maintenance, expansion, and construction of new facilities as demand increases. See also Responses MR-1 and MR-2.
- 23-14 The commenter raises questions about measures of educational goals of LAUSD schools. The purpose of the Draft EIR is to assess the impact of the Proposed Plan on the environment. The comment regarding the capacity of LAUSD schools is noted. CEQA does not require the EIR to examine the scholastic achievement of public schools. The Draft EIR analyzes the potential impact of population growth to existing public schools, the HCP proposes policies for continued partnerships with the LAUSD to monitor and forecast capacity and demand of school services in the HCPA. See also MR-1 regarding broader demographics in Hollywood.
- 23-15 Comments regarding the use of the term “Public Services” instead of “Infrastructure” in the Draft EIR are noted. The City of Los Angeles CEQA Initial Study Checklist was used in the preparation of the Hollywood Community Plan Update EIR. It lists Public Services and Utilities/Service Systems among its environmental factors. Listed under XIV Public Services are impacts to Fire protection, Police protection, Schools, Parks and Other Public facilities (which would include Libraries). XVII Utilities includes impacts to water, wastewater, and solid waste. The initial study checklist does not have an environmental factor listed as Infrastructure. The Draft EIR retained the environmental factors as listed in the Initial Study Checklist. However, some of the factors listed under Public Services and Utilities may be considered as Infrastructure and the terms may be used interchangeably

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under certain circumstances. In fact, Chapter 5 of the Proposed Community Plan is titled Community Facilities and Infrastructure.

Section 4 of the DEIR identifies thresholds, impacts, and mitigation measures for each of the public service areas identified under the general term “infrastructure.”

See Response MR-2 and 23-12. The Draft EIR analyzes the overall environmental impacts of the Proposed Plan at a community level. As individual discretionary projects on individual sites are proposed, the existing conditions at those particular sites will be determined and any impacts will be addressed through project-level environmental analysis, as appropriate.

The Final EIR includes a chapter containing the mitigation monitoring program, which identifies agencies and city departments responsible for implementing the proposed mitigation measures.

- 23-16 Comments about impacts to water are noted. The commenter cites from the Proposed Plan text as well as the Draft EIR text.
- 23-17 Comments noted. As development occurs, incremental improvements and upgrades will take place under the direction of DWP and other utilities. Customer revenues throughout the life of the Proposed Plan will fund large-scale modernizations and maintenance. See Response MR-2.
- 23-18 Transit services in the Plan area are provided by the Los Angeles County Metropolitan Transportation Authority (Metro) that includes both subway and bus service. The City of Los Angeles (LADOT) also provides some bus transit service (DASH and Commuter Express). The commenter states that sidewalks will be maintained for walkability and streets will not be widened or re-designated. The majority of street designations shall remain as currently in place, however proposed re-designations to streets are listed in the Draft Hollywood Community Plan Street Standards, and include the general re-designation of La Brea Avenue to include 15 foot sidewalks and a 70 foot roadway instead of the currently specified 12 foot sidewalks and 80 foot roadway. The majority of La Brea Avenue is currently improved with 15-foot sidewalks and a 70 foot roadway, in which case the impact of the re-designation will be to maintain existing conditions. No automobile travel lanes on La Brea Avenue are affected in either scenario. The LWC area is included in the areas where neighborhood traffic management plans are recommended (See Appendix C, Page 69 of Draft EIR).
- 23-19 Transit stations near residential and workplaces encourage the use of public transportation when access to the transit service is convenient and safe and the transit service itself is of high quality (i.e., frequent, fast service) and affordable. The Draft EIR does not assume that residents near transit stations will not have cars.
- 23-20 See Response 5-20 regarding the ClimateLA Plan. The commenter does not identify additional standards that the City ought to meet; the Draft EIR identifies applicable regulations (many of which include standards) and mitigation measures. No further response is possible. Existing requirements of other Citywide plans and policies (such as ClimateLA) apply to City actions within Hollywood. The Draft EIR finds that the Proposed Plan could result in significant impacts on sensitive receptors (see page 4.6-26):



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“Implementation of the Proposed Plan could expose sensitive receptors to substantial pollution concentrations in excess of the established LST during construction of individual projects.” As vehicular controls continue to tighten, it is not anticipated that mobile emissions will result in significant CO hotspots since emission rates are anticipated to be five times less in 2030 than in 2005 (see page 4.6-16). While air toxics are anticipated to continue to be an issue, the City will implement mitigation measures to address this issue (see Responses to Letter 2). Mitigation measures are dictated by a number of factors (location, use, etc.) not just project size. Using project size as the only indicator of mitigation for air quality impacts is not appropriate.

- 23-21 Construction impacts vary substantially from project to project depending on the type of development proposed, depth of excavation needed, proximity to sensitive uses, soil conditions, etc. It is not possible to address the variety of potential construction scenarios and appropriate mitigation in a programmatic document; such analyses must be conducted in project specific environmental documents. Similarly cumulative construction impacts from simultaneous construction activities in proximity to each other such that noise impacts overlap must be addressed on a project-by-project basis in the cumulative section of project-specific documents since the nature of overlapping impacts will differ depending on project-specific conditions.

Operational noise impacts are almost entirely traffic related. Table 4.7-6 shows locations where traffic noise would increase by 3 dBA or greater. As noted in the text on page 4.7-14, “increased traffic on the following street segments could result in a significant impact with regard to ambient noise levels: Griffith Park Boulevard between St. George Street and Hyperion Avenue, Hollywood Boulevard between Prospect and Vermont Avenue, and Fountain Avenue between Cahuenga and Vine.” Mitigation measures that reduce traffic would also reduce noise impacts, but based on traffic anticipated in the project area, traffic noise impacts would remain significant. As noted in the comment the Proposed Plan encourages mixed-use and residential development adjacent to transit and other noise sources. However, location of uses as recommended would be anticipated to reduce the number and length of trips overall in the area thus reducing area-wide noise. In deciding whether to approve the proposed Plan the decisionmakers must balance planning and environmental objectives.

The Citywide Noise Element of the General Plan is summarized on pages 4.7-8 and 4.7-9 of the Draft EIR and is applicable to development in Hollywood. Appropriate design, noise insulation and an interior noise level of 45 dBA are all current requirements for development in Hollywood that would continue to apply under the Proposed Plan. Nonetheless, exterior noise levels would continue to be over the threshold of significance and noise impacts would therefore remain significant.

- 23-22 As noted by the commenter, each site in the community is unique in terms of how it may react to groundshaking. There are numerous State and local regulations that address construction to ensure that all site-specific conditions are addressed as part of the permit process. Site-specific geotechnical investigations and foundation design are a key part of the permit process of projects in the City including Hollywood; all projects are required to comply with applicable codes and regulations. The Proposed Plan would not change the need for emergency preparedness. As noted in the Draft EIR, “[i]mplementation of the land uses changes permitted by the Proposed Plan would likely result in the replacement of older

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structures by new, better performing structures, thus reducing the level of risk on a site specific and cumulative basis.”

The Draft EIR generally addresses dam failure on page 4.8-5, “catastrophic failure of a major dam as a result of a scenario earthquake is regarded as unlikely . . . [c]urrent design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams ensure that all dams are capable of withstanding the maximum credible earthquake for the incentive area.”

23-23 The commenter expresses opinions about projects built at the Hollywood and Highland and Hollywood and Western metro stations. Development in these areas opened around 2001, and was included in the 2005 Existing Conditions for traffic analysis. Socio-economic issues are not addressed by CEQA. The Hollywood Community Plan will require findings pursuant to City Charter Section 556 and 558 as consideration for final adoption. Comments regarding compatibility with these Charter Sections and other elements of the General Plan will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Responses MR-1, MR-2, and above responses in regards to infrastructure, census data, forecasts, and estimates.

23-24 The commenter summarizes concerns regarding the Proposed Plan referenced throughout the comment letter. Please see Responses 21-1 through 23-23 and Response MR-3. Additional reference materials are noted and received in the file.

**24. The Silverstein Law Group. Bradly Torgan, representing the La Mirada Avenue Neighborhood Association, June 1, 2011**

24-1 The commenter states concerns regarding the existing conditions analyzed in the EIR and the recently released Census data available from the 2010 census. The commenter states that population within the Hollywood Community Plan has decreased. Comment noted. See Response MR-1.

24-2 See Response MR-1.

24-3 See Response MR-1.

24-4 See Response MR-1.

24-5 See Response MR-1.

24-6 See Response MR-1.

24-7 See Response MR-1.

24-8 See Response MR-1.

24-9 The commenter expresses concern over the use of existing conditions as a potentially inaccurate baseline that has not been fairly or accurately described. In accordance with CEQA the baseline for the EIR analysis is 2005, the year the NOP was published for the EIR. The baseline data for each factor for the base year 2005 were obtained from the

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relevant departments and entities. Comments regarding concerns over recently released census data are addressed in Response MR-1. See Response 24-10 through 24-13.

- 24-10 The horizon year of the Hollywood Community Plan is 2030. Population data, shifts in household sizes, and household formation rates may continue to change throughout the life of the plan. In accordance with CEQA the baseline for the EIR analysis is 2005, the year the NOP was published for the EIR. See Response MR-1 regarding population and housing estimates and the relation of recent 2010 Census data for Hollywood.
- 24-11 The commenter addresses the net population change between the base year of 2005, the 2010 Census, and the horizon year of 2030. In accordance with CEQA the baseline for the EIR analysis is 2005, the year the NOP was published for the EIR. The total population analyzed in the DEIR through 2030 is consistent. See Response MR-1 for population discussions using the 2005 base year and 2010 Census data. In addition, see Section 4, Corrections and Additions where 2010 data has been added to certain sections of the EIR.
- 24-12 See Responses 24-11 and MR-1.
- 24-13 The commenter summarizes concerns regarding changing vacancy rates and the number of occupied housing units for the base year of 2005, the 2010 Census, and the horizon year of 2030. In accordance with CEQA the baseline for the EIR analysis is 2005, the year the NOP was published for the EIR. The total number of housing units analyzed in the DEIR through 2030 is consistent. See Response MR-1 for housing unit data using the 2005 base year and 2010 Census data.
- 24-14 See Responses to Letter 2.
- 24-15 See Responses to Letter 2.
- 24-16 See Responses to Letter 2.
- 24-17 See Responses to Letter 2.
- 24-18 See Responses to Letter 2. In deciding whether to approve the Proposed Plan, the decisionmakers must weigh the anticipated impacts against the planning and environmental benefits.
- 24-19 The commenter states that Policy LU.2.3 in the Draft Hollywood Community Plan Update is inconsistent with the General Plan Framework. Policy LA.2.3 proposes to extend the Regional Center designation beyond the geography described in the General Plan Framework. On page 1-8 of Chapter 1 in the General Plan Framework it states that “As the City evolves over time, it is expected that areas not now recommended as neighborhood districts, community and regional centers, and mixed-use boulevards may be in the future appropriately so designated.” It is intended that the General Plan Framework Land Use Diagram will be amended concurrently with this action to reflect the land use changes proposed through the community plan update process.
- 24-20 The commenter states that Policy LU.2.2, which recommends the use of Floor Area Ratio bonuses to incentivize commercial and residential growth in the Regional Center, is inconsistent with the various elements of the General Plan because it promotes growth

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beyond the amount forecast for Hollywood. This is not accurate; the Proposed Plan analyzes the reasonably expected development in Hollywood through the year 2030. Policy LU.2.2 does not create any direct incentives not analyzed in this program EIR, and future programs supported by the plan policy would require project-level environmental analysis through future discretionary action. This policy is consistent with directing the forecasted levels of growth, if and when they occur, around transit infrastructure in the Hollywood Regional Center area of the plan. The Hollywood Community Plan will require findings pursuant to Chapter Section 556 and 558 as consideration for final adoption. Comments regarding compatibility with these Charter Sections and other elements of the General Plan will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

- 24-21 See Responses 24-19 and 24-20.
- 24-22 Comments noted. The commenter cites from the CEQA Guidelines on cumulative impacts.
- 24-23 Comments noted. Draft EIR Section 6.6 Cumulative Impacts, pages 6-9 through 6-13, discusses cumulative impacts. CEQA Guidelines, as cited by the commenter in Comment 24-22, above, states that a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Since the project evaluated in the Draft EIR, the Proposed Plan, is a planning project with a long-term horizon, and not an individual development project, the other applicable projects with which it might combine to create impacts are other plans and policies. The cumulative impacts section contained in Pages 6-9 through 6-13 of the Draft EIR analyzes each environmental factor and identifies which factors might result in a cumulatively significant impact and which would not.
- 24-24 The comments addressing cumulative impacts are noted. See Response 24-23, above.
- 24-25 See Responses 26-1 through 26-8.
- 24-26 The Draft EIR does indicate Alternative #2 (No Project) to be the Environmentally Superior Alternative because it allows for the lowest amount of development. However, as stated in the Draft EIR the existing plan (no project alternative) does not meet the “social, economic, and planning goals and objectives of the City” to direct growth in a manner that supports public transit and sustainable development. For comments concerning population data, see Response MR-1.
- 24-27 CEQA applies the “rule of reason” to the range of alternatives required in an EIR, in the Guidelines Section 15126.6 (f), further stating that “the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project.” Feasibility is defined by “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...” For comments concerning population data, see MR-1.
- 24-28 Comment noted. See Responses 24-1 through 24-7 and MR-3.

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**25. La Mirada Group, Suriya Prasad, Member, June 1, 2011**

25-1 The commenters' request regarding downzoning of the La Mirada Avenue neighborhood is noted. The recommendation to restore standard R4 density in the [Q]R4 area for SubArea 23:4 is currently being evaluated by staff for revision; the comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.

**26. Arthur Kassan, La Mirada Avenue Neighborhood Association, May 31, 2011**

26-1 Comment noted. See Response MR-3.

26-2 The detailed calculations of volume-to-capacity ratios by link and by direction on each link are included in the Appendices of the TIMP (the TIMP is Appendix C of the Draft EIR). The volume weighted average V/C measure was used to assess whether or not a land use alternative under consideration would have a significant impact, since the City's threshold of significance was based on a change in the volume weighted average V/C. To make the description of the volume weighted average V/C more understandable to the lay person, it was stated as the percentage of capacity of the street system, such on page 4.5-31: "The volume-weighted V/C ratio is 1.000 for the year 2030 Proposed Plan scenario. This indicates that on the whole, the streets in the Hollywood planning area would operate at 100 percent of capacity in the PM peak hour."

26-3 The commenter is correct to note that there was very little difference in the trip generation characteristics of the land use alternatives evaluated.

26-4 The key word in that phrase is "efficient" freeway, highway and street network. TSM improvements are largely designed to make the system more efficient.

26-5 The TIMP recommends that a nexus study be conducted to develop a potential funding mechanism for transportation improvements in Hollywood. This would include neighborhood traffic management measures in the list of improvements to be funded. Lacking such a funding mechanism, the Draft EIR relies upon the development review process to implement Mobility policies by individual development projects. Implementation could include improvements in the area noted in this comment if a development was shown to have an impact at the intersection of Santa Monica Boulevard/Western Avenue.

26-6 The nexus study is a recommendation of the EIR. In addition, City guidelines for traffic impact studies require project-specific studies for all developments that generate 500 or more daily trips or 43 or more PM peak hour trips. Such project-specific traffic studies include mitigation measures as feasible and appropriate to address impacts on a project-by-project basis.

26-7 The introductory paragraph to the list of improvements that include the widening of Fountain Avenue is the following: "The 2008 Metro Draft LRTP contained the list of projects below in the Hollywood area. The project list was eliminated from the adopted 2009 Long Range Transportation Plan, but the list illustrates the projects that the City of Los Angeles intends use LRTP funding programs to implement." This was not a list of TIMP recommendations, but rather background information on improvements the City has previously considered. The recommended street cross section for Fountain Avenue is

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contained in Appendix B of the TIMP. It is recommended as a Modified Secondary Highway with a roadway width of 56' in a 76" right of way.

26-8 The commenter summarizes the findings of the Draft EIR analysis. As noted, the proposed Hollywood Community Plan and TIMP will not result in conditions significantly different that would be forecast to occur under the existing Plan. See Response 26-6 with regard to the nexus study.

**27. Loyola Marymount University Environmental Action Team, Greer Gosnell, Member, April 30, 2011**

27-1 Comments noted. See MR-3.

27-2 The commenters' ideas about mixed zoning which encourages a mix of single-family homes, lower density multiple family housing, and higher-density apartment buildings are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.

27-3 All bikeways proposed by the City of LA Bike Plan are included in the Hollywood Community Plan Update as study corridors. See Responses 5-18 and MR-3.

27-4 The commenters' recommendations regarding improvement in the distribution of open space and the location of community gardens near high-density areas is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Policy LU.5.19 in the Hollywood Community Plan Update encourages the provision of space for a community garden as a public benefit. See also Response MR-3.

27-5 The comment regarding the installment of Catch Basin Screen Covers is noted. Such covers are identified in the City's Stormwater Program in partnership with the Department of Public Works and the Bureau of Sanitation; covers are expected to be installed in all City-owned catch basins as funds become available.

27-6 Comments noted. See Response MR-3.

**28. Mulholland Scenic Design Review Board, Alan Kishbaugh, Chair, June 1, 2011**

28-1 Policy M.1.43 suggests that planned bicycle routes, like the one on Mulholland Drive noted in this comment, remain on the Community Plan Map 12 as a Proposed Class II bikeway. This policy does not create a physical change to Mulholland Drive and therefore does not create an environmental impact requiring analysis. If/when the City of Los Angeles endeavors to implement the proposed bikeway, the coordination between the City departments and the Mulholland Scenic Parkway Design Review Board and the Santa Monica Mountains Conservancy will be appropriate and is likely to result in a Modified Street Standard, as suggested in this comment. The comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

**29. Outpost Estates Home Owners Association, Marla Strick, secretary, June 1, 2011**

29-1 The commenter summarizes the congestion levels forecast in the Draft EIR and correctly notes the potential for additional cut through traffic on residential streets, like Outpost Drive.

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This neighborhood is included in the areas where neighborhood traffic management plans are recommended (See Appendix C, Page 69 of Draft EIR).

- 29-2 The suggestion for funding of the LADOT neighborhood traffic management program will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 29-3 The suggestion that Outpost Drive be re-designated as a local street is currently being evaluated by staff and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 29-4 The commenters' proposed height limits along Fitch Drive and Sycamore Avenue north of Franklin Avenue are noted. Staff is evaluating revisions to the land use recommendations in this area, and these suggestions will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 29-5: The commenters' request regarding the retention of the two single-family homes at the foot of Outpost Drive is noted. Amendments to the Hollywood Redevelopment Plan are not proposed as part of this Plan update.
- 29-6 The commenter's request for a correction of the Plan map regarding a roadway between Outpost Circle and Fitch Drive is noted. The referenced map was produced for the purposes of identifying the locations of change areas only. It is likely that the street is a "paper street" with land already dedicated to the City. It is not proposed for build-out and staff is in the process of revising the map; the comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 29-7 The commenter's name and address has been added to the contact list for further notifications regarding the Hollywood Community Plan Update.

### **30. Pablo & Jackie Ruiz, June 1, 2011**

- 30-1 The height district and zone changes proposed in the subareas along Western Avenue and Melrose Avenue, near the Melrose Hill Historic Preservation Overlay Zone, allow for economic growth but include the "Q" qualifying condition that establishes pedestrian-oriented design standards. Although the Proposed Plan identifies higher Floor Area Ratios (FAR), the subareas are buffered by transition areas. The Proposed Plan recognizes the importance of preserving historic and cultural resources. Discretionary projects with the potential to result in significant impacts will require project-level CEQA review and mitigation measures to reduce any potentially significant impact of such development. The comment requesting additional design regulations for those areas abutting historic districts is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 30-2 The comment relates to potential impacts of the plan to the Melrose Hill HPOZ. The City's Historic Preservation Overlay Zone Ordinance does not require projects outside the boundaries of, or abutting, an HPOZ to be reviewed by an HPOZ Board or staff. However, potential impacts, including indirect impacts, to an HPOZ will be assessed when environmental review is triggered by requested discretionary approvals.

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- 30-3 See Response MR-1.
- 30-4 The comment requesting that above grade parking be included in Floor Area Ratio calculations is noted. No changes to the way in which floor area is calculated are proposed in the Plan, and parking areas generally are not counted towards floor area limitations. The commenter's suggestion that parking be below grade is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 30-5 Recommendations regarding minimum lot depths for retail are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. The commenter correctly identifies the subject 25 foot depth recommended for retail spaces as a minimum number. See Response MR-3.
- 30-6 Recommendations regarding height limits are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. The subject area falls under the existing Vermont/Western Station Neighborhood Area Plan, and no changes to the height regulations within this specific plan are proposed as part of this action. See Response MR-3.
- 30-7 Recommendations regarding design review are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 30-6 and MR-3. The Vermont/Western Station Neighborhood Area Plan contains project-level design review procedures per the existing ordinance in this area, which is not being revised.
- 30-8: The commenters' opinions regarding proposed Floor Area Ratio Incentive Areas on Santa Monica Blvd. and Western Avenue are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 30-9: Comment noted. See Response MR-3.
- 30-10: The commenters' recommendations regarding parking garages are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. No changes to existing parking requirements are proposed as part of this action. See Response MR-3.
- 30-11 See Draft EIR Section 4.4 Utilities, page 4.4-1 for further information about the current and projected infrastructure usage and demand. The City in conjunction with LADWP has measures in place to deal with emergency situations. LADWP's 2010 Urban Water Management Plan provides strategies to reduce citywide water use and measures to meet demand. The City's Integrated Resource Plan also focuses on energy efficiency and the development of renewable energy resource. See Response MR-2.
- 30-12 Comments noted. While the Proposed Plan encourages quality design, the purpose of the Draft EIR is to identify and analyze potentially significant impacts to the project area. The threshold of discretionary review is not being changed as part of this action. The commenter's request for additional development-level discretionary review procedures will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
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30-13 The proposed Hollywood Community Plan strives to protect the historic and cultural resources unique to Hollywood. The Draft EIR provides a programmatic analysis of the community as a whole. Projects triggering discretionary review will be subject to project-level environmental analysis, including shade/shadow and aesthetic analysis where required.

30-14 Comment noted. See Response MR-1.

**31. Craig Lawson & Co. LLC, Craig Lawson, President, May 31, 2011**

31-1 Comment noted.

31-2 Comment noted. The referenced project approval, CPC-2008-3087-ZC-HD-ZAA-SPR and VTT-70119-CN were approved by City Council on May 17, 2011. Staff is revising the land use designation and zone change areas to reflect this City action. Design guidelines within the Community Plan are not standards but shall be used as a resource for staff and applicants in assessing and applying for future discretionary approvals.

31-3 The comment regarding minimum required floor area ratios in relation to the recently approved development at Hollywood Boulevard and Gower Avenue is noted.

31-4 Comment noted. See Response 31-3. Staff is evaluating revisions to the land use recommendation in this area.

31-5 The commenter proposes a flexible minimum commercial component standard for future development that that considers the physical characteristics of the lot in lieu of a minimum floor area requirement for mixed-use projects. The comment is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-3.

31-6 See Responses 31-1 and 31-5.

**32. Forest Lawn Memorial-Parks & Mortuaries, Darin B. Drabing, President and CEO, June 1, 2011**

32-1 and 1-31-2 Comments noted. In other community plans, cemeteries are typically designated Open Space, consistent with the General Plan. A notation/symbol will be included to the Hollywood Community Plan Update identifying Forrest Lawn Memorial-Park – Hollywood Hills as a cemetery.

**33. LT Properties, Vytas Juskys, May 31, 2011**

33-1 The proposed Hollywood Community Plan Update does include Urban Design Guidelines; see Chapter 7, page 165. However, the commenter appears to be referring to the Community Redevelopment Agency (CRA) Draft Hollywood Boulevard District and Franklin Avenue Design District Urban Design Standards and Guidelines. The proposed CRA design guidelines are more detailed than those included in the Proposed Plan and are not part of the Proposed Plan.

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The Hollywood Community Plan addresses issues concerning land use, housing, transit, and compatibility of use. The comment is noted regarding lot designations. Specific issues relating to lot size, zone designation, and heights are reviewed on a case-by-case basis and those affected by the proposed CRA's Urban Design Standards are independent of the more general Urban Design Guidelines contained within Chapter 7 of the proposed Hollywood Community Plan.

- 33-2 Comment noted. The commenter is referring to the Community Redevelopment Agency's (CRA) Draft Hollywood Boulevard District and Franklin Avenue Design District Urban Design Standards and Guidelines not the Urban Design Guidelines in the Draft Hollywood Community Plan.

**34. NBC Universal, Tom Smith, June 1, 2011**

- 34-1 Comment noted. The policies referenced relate to potential infrastructure improvements in the vicinity of the NBC/Universal Evolution Plan and are not dependent upon the Evolution Plan's approval nor the approval of its traffic mitigation plan. Policy M.1.80 "Supports" construction of a roadway through the NBC/Universal property as an alternate route to the congested Barham Boulevard corridor, but it does not require it, nor place it on the City's Hollywood Community Plan map, since it is outside of the plan's boundaries. The improvements suggested on Barham Boulevard and Cahuenga Boulevard East could be implemented by the City independent of the NBC/Universal Evolution Plan. Policy M.1.83 suggests working with Caltrans on improvements to that interchange with the intention that improvements could relieve traffic demands on Forest Lawn, Barham and Lankershim Boulevards. A specific ramp improvement is not required.

**35. Paramount Contractors & Developers, Brian Flob, March 7, 2011**

- 35-1 The comment is noted regarding properties at 6464 & 6465 Sunset Boulevard. Neither of these properties is designated and the historic status of non-designated properties is not addressed in the EIR. Questions should be directed to the Community Redevelopment Agency as the subject properties are located within the Hollywood Historic Resources Survey Update area.

**36. JMBM, representing Quite Lion 1 L.P., Kevin K. McDonnell, May 27, 2011**

- 36-1 Parking only becomes a physical environmental impact under CEQA if changes in parking location, supply, or accessibility results in other physical environmental impacts – such as traffic circulation, air quality, land use impacts, etc. Provision of parking was recently removed as a CEQA checklist question. The Proposed Plan includes Parking Policies designed to improve the utilization parking in Hollywood. The Plan does not propose the removal of off-street or on-street parking and as such does not create any impacts associated with vehicles circulating greater distances to find available parking. The Plan encourages the replacement of existing off-street spaces when new development displaces surface parking lots. It is the responsibility of the owners/operators of the land use that relies upon those existing spaces to find alternate spaces for the parking demand generated by that land use. The Plan encourages shared use of parking spaces to increase the efficiency of the parking supply. As required by the City's Zoning Code, new developments will be required to provide off-street parking. The Proposed Plan's Parking Policies seek to provide flexibility in how these parking requirements may be satisfied in order to improve the

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overall utilization of parking in Hollywood, but it does not eliminate the requirement for new developments to meet their individual parking requirements.

36-2 The Proposed Plan is the updating of the existing Hollywood Community Plan and, as such, pertains only to those parcels of land within the Hollywood Community Plan Area. The Draft EIR, in turn, analyzes the environmental impacts of the Proposed Plan. The Draft EIR does analyze each and every subarea that has been identified for land use and/or zone changes in the Proposed Plan and the reasons for such changes are listed in the analysis for each subarea. However, analyzing potential inconsistencies between land use designations in the Plan Area and those in adjacent jurisdictions, such as West Hollywood, as suggested by the commenters, is beyond the scope of the Draft EIR. The commenter's request that additional parcels located generally north of the portion of Sunset Boulevard in West Hollywood, which are located within the City of Los Angeles boundary, be identified as areas of change to higher density housing is noted. The commenter's remarks regarding inconsistencies between land use designations in the Hollywood Community Plan area and land use designations in the City of West Hollywood are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

**37. Sheppard Mullin Richter & Hampton LLP, representing Sunset Studios Holdings LLC, James E. Pugh, May 26, 2011**

37-1 The commenter's request to create a consistent zone for the subject property is noted. Staff is evaluating the proposed recommendation in this area. The Draft EIR analyzes land use changes proposed in the Draft Hollywood Community Plan Update. No further environmental comment is provided in the letter. The commenter's recommendations for land use changes regarding SubArea 6:4 will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

37-2 Comments noted. The proposed "Q" qualifying conditions and "D" development limitations are outlined in the Draft "Q" Qualifying Condition and "D" Development Limitation Appendix by subarea of change. See Response 37-1.

37-3 Comments noted. See Response 37-1.

**38. Siren Productions LLC, Dean Gavoni, CEO, President, May 26, 2011**

38-1 The commenter's recommendations regarding land use changes for lots in SubArea 6:1 and those lots north of Subarea 6:1 fronting onto La Baig Avenue are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Subarea 6:1 proposes a change from Highway Oriented Commercial to Regional Center Commercial for those lots fronting Sunset Boulevard. See Response MR-3.

**39. Craig Albert, May 27, 2011**

39-1 The commenter's concerns regarding views, privacy, noise, parking, and traffic and concerns about any expansion of commercial uses which back up onto properties on Outpost Drive are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 29-4, 29-5, and MR-3.

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**40. Bob Barker, May 27, 2011**

40-1 See Response 39-1.

**41. Kenneth W. E. Berry, May 31, 2011**

41-1 See Response 39-1.

**42. Robert Blue, June 1, 2011**

42-1 See Response MR-1.

42-2 See Response MR-1.

42-3 See Response MR-1.

42-4 Climate change plays a significant role in the City's water supply. The Proposed Plan and its potential impacts on water resources are analyzed in Section 4.4 of the Draft EIR. LADWP's 2010 Urban Water Management Plan outlines measures to assess existing and future water supplies and conserve and reduce water demand, and provides for how water will be supplied to the City.

42-5 See Response 42-4. The comment recommending no increases in permitted density as a result of impacts to the water supply is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

42-6 The commenter states the Draft EIR does not adequately analyze impacts on infrastructure including the water supply. Comments summarizing the purpose of an EIR are noted; no specific questions regarding the analysis are raised. The proposed Hollywood Community Plan and its impact on water resources is analyzed in Section 4.4 of the Draft EIR. The EIR is a program level analysis. Project-level environmental clearance for discretionary approvals and water supply assessment procedures with LADWP will continue to be required. See Response MR-2.

42-7 The commenter indicates that the Proposed Plan should address current infrastructure issues before allowing increased density. The Hollywood Draft EIR analyzes impacts to public services and infrastructure that are expected over the life of the Proposed Plan. The commenter expresses concerns about water and power infrastructure. The Draft EIR analyzes the impact of the Proposed Plan on water resources and energy resources in Section 4.4. See Response 48-17 for a discussion of DWP's Power Reliability Program to replace aging infrastructure and make permanent repairs. See also Response MR-2.

42-8 Comment noted. Sidewalk and street repairs are scheduled and undertaken by the Department of Public Works. The Hollywood Draft EIR analyzes impacts to park spaces beginning on Page 4.3-18 of the document. See Response MR-2.

42-9 The comment relates to the protection of the Hollywood Boulevard Commercial and Entertainment District. See comment 20.3. All proposed discretionary projects within the Hollywood Community Plan area, including the Hollywood Boulevard Commercial and Entertainment District, will be reviewed for potential impacts to historical resources.

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- 42-10 Comment noted. See Response MR-3
- 42-11 The Chapter 7, Urban Design Guidelines, beginning page 165, of the Plan proposes policies and measures to protect the cultural and architectural history of Hollywood. Building orientation, scale, height, massing, façade, and pedestrian elements are considered in respect to the existing physical and built environment. Impacts of future discretionary projects are subject to review by DCP.
- 42-12 See Response 24-27. CEQA applies the “rule of reason” to the range of alternatives required in an EIR, as noted in CEQA Guidelines Section 15126.6 (f), that state that “the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project.” Feasibility is defined by “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...” CEQA Guidelines Section 15126.6(f)(1).
- 42-13 The commenter summarizes points of objection. See Responses MR-1 and MR-2.
- 43. Elaine Brown, June 1, 2011**
- 43-1 Comments noted. See Response MR-3.
- 43-2 The Final EIR includes a chapter containing the mitigation implementation and monitoring plan that identifies agencies and city departments responsible for implementing the proposed mitigation measures. See Response MR-1.
- 44. Shell & Craig Cardon, May 27, 2011**
- 44-1 See Response 39-1.
- 45. Joyce Dillard, June 1, 2011**
- 45-1 The Draft EIR examines and analyzes transportation infrastructure in Section 4.5 page 4.5-1. Studies have examined the movement of all vehicle types on streets. Comments regarding SCAG’s Regional Sustainable Communities Strategy are noted. See Response MR-3. The Sustainable Communities Strategy of the 2012 Regional Transportation Plan (RTP) addresses the integration of transportation and land use planning, to promote strategies that will reduce greenhouse gases. While the RTP has not been completed, the Proposed Plan encourages transit-oriented-development and land use policies that take advantage of existing transit lines and infrastructure. The Plan proposes a series of policies to encourage sustainable development – see Chapter 3 of the Land Use Plan – Goal LU.5 Encourage sustainable land use and building design, page 94.”) See Response MR-3. The City of Los Angeles addresses land use for the General Plan through its 35 community plans. Other issues such as noise, transportation, open space, etc., are addressed through citywide ordinances and General Plan elements. In accordance with SB 375, current planning focuses on aligning residential uses and employment centers along transit routes in order to facilitate use of transit and reduction in greenhouse gas emissions. The Proposed Plan addresses SB 375 which focuses on reducing trips and trip length from cars and light trucks, not the larger trucks generally associated with goods movement. The Office of Goods Movement of the

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Los Angeles Department of Transportation (LADOT) has prepared Goods Movement Action Plans in order to ensure the ease of such movement throughout the City.

- 45-2 See Responses MR-1 and MR-3.
- 45-3 Comments noted.
- 45-4 See Chapter 3 of the Land Use Plan, Policy CF.5.37, in the Draft Hollywood Community Plan Update which states, “[e]ncourage the provision of alternative schools, such as charter schools as a method of delivering quality public education at the neighborhood level”. See also Response MR-3. The Draft EIR analyzes the impacts of the Proposed Plan. Charter Schools are addressed in Chapter 5 of the Hollywood Community Plan, School Policies, page 144. The comment on workforce housing is noted.
- 45-5 Transportation analysis was conducted in conjunction with preparation of the Hollywood Transportation Improvement and Mitigation Program (TIMP). SCAG’s Traffic Analysis Zones (TAZs) were used and refined to analyze the impacts of future growth in the CPA (see Draft EIR Section 4.5 Transportation, page 4.5-10 Model Refinement). For further response to comments concerning population growth, see Response MR-1.
- 45-6 The comments regarding the disclosure of transportation investments are noted. The Proposed Plan supports the vision of focused growth outlined in the General Plan Framework and SCAG’s Compass Blueprint (see page 3-2 of the Draft EIR). The Draft EIR analyzes the impacts of the Proposed Hollywood Community Plan. The comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 45-1 and MR-3.
- 45-7 Comments regarding Climate Change Action Plans and related programs are noted. A 2007 Los Angeles County Coastal Plain Basins-Hollywood Basin report by the Metropolitan Water District indicates that the Hollywood Basin is currently managed by the City of Beverly Hills, which also “owns and operates four groundwater production wells”. See Draft EIR Section 4.4 Utilities: Water Resources, page 4.4-3, for a complete listing of local groundwater basins and recycled water programs.
- 45-8 While purple pipe infrastructure has not yet been implemented in the Hollywood Plan Area, LADWP has expanded the purple pipe program for industrial and irrigation uses in the Valley. The City’s Integrated Resources Program collaborates with the Bureau of Sanitation, Department of Public Works, and the Department of Water and Power to meet the needs of a growing population.
- 45-9 Comments addressing the Desert Southwest Line are noted. LADWP provides electricity service to the Hollywood Plan Area. The City’s Integrated Resource Plan, in partnership with LADWP allows for the development of renewable energy sources and energy efficiency programs to reduce air pollution and meet increasing demand. For further information regarding utility needs, monitoring, and mitigation see Draft EIR, Section 4.4 Utilities: Energy Resources, page 4.4-9.
- 45-10 The City’s Solid Waste Management Policy Plan includes the development of recycling facilities to minimize the amount of solid waste sent to landfills. See Draft EIR Section 4.4 Utilities: Solid Waste Generation and Disposal, page 4.4-28.

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- 45-11 The comment regarding low impact development is noted. Development standards are subject to the Department of Building and Safety and are reviewed on a case-by-case basis.
- 45-12 Oil and gas associated with motor vehicle fuel are categorized under carbon monoxide and methane is listed as a greenhouse gas. The Draft EIR addresses standards set by national and State air quality standards as well as the SCAQMD and the City. See Draft EIR Section 4.6 Air Quality, page 4.6-1.
- 45-13 Comments noted. See Response MR-3.

**46. Brian Dyer, May 31, 2011**

- 46-1 Comments concerning parking are noted. State Enterprise Zones (SEZ) target commercial areas, and the parking reductions exist per State law and are not a part of the Proposed Plan changes. Projects not in the SEZ are subject to the City's existing parking requirements. The Plan encourages the strategic growth and development of targeted areas near public transportation to minimize use of private vehicles. Metro's Red line runs along Hollywood Boulevard, two blocks south of Franklin Avenue, and in Metro busses also service the area. The Proposed Plan takes into consideration the impacts of increased density and population in the Draft EIR and in the Traffic Improvement and Mitigation Program (TIMP). The proposed Hollywood Community Plan update and Draft EIR identify policies to improve mobility and access. See Chapter 4, Mobility Plan, Parking Policies page 117 of the Draft Hollywood Community Plan Update and Appendix C Hollywood Community Plan TIMP, Parking Policies, page 72.

Variations for height restrictions are reviewed on a case-by-case basis, subject to the required findings for such variations.

- 46-2 Comments concerning infrastructure capacity and funding are noted. See MR-2. The Proposed Plan and Draft EIR, including the Hollywood Community Plan's Transportation Improvement and Mitigation Program (TIMP), anticipate traffic impacts associated with increased density in targeted areas of the planning area. The Proposed Plan includes mitigation measures to improve mobility and access and addresses demand management strategies and pedestrian mobility. See the Draft Hollywood Community Plan Update and Relevant Policies of the Proposed Plan, page 4.5-21 of the Draft EIR.

The Proposed Plan and TIMP both propose policies and programs to manage neighborhood traffic. See Policies M.1.86-M.1.90 in the Mobility Chapter of the Draft Hollywood Community Plan and Section 4.2.6, Neighborhood Traffic Management Plans, in the TIMP.

Although the Proposed Plan cannot predict the behavior of pedestrians and residents, concentrating development in core areas of Hollywood near major transit facilities promotes State and regional (SCAG) goals to reduce vehicle miles travelled (VMT) and greenhouse gas emissions. See Response MR-3.

- 46-3 Comments concerning the vulnerability of high densities to natural disasters are noted. New buildings are required to meet regulations and requirements of the Plan, City of Los Angeles, California Building Code (CBC), and the Uniform Building Code (UBC) to minimize the risks associated with seismic activity. For a discussion of seismic hazards see

Section 4.8 Geology and Soils, page 4.8-11 of the Draft EIR. The comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

**47. Robert Eicholz, May 31, 2011**

47-1 See Response 39-1.

**48. Orrin Feldman, Individual & VP of HHWNC, June 1, 2011**

48-1 Background information provided by the commenter is noted.

48-2 Comment acknowledged. The description of the project location on the cover page, in Section 2.0, page 2-1, and Section 3.3, page 3-3, is revised to indicate “south” rather than “east” of Mulholland Drive.

48-3 See Response 52-2. The Proposed Plan’s changes in land use designations and zone changes are based on the SCAG 2030 projections and adjusted to respond to SB 375 to accommodate more development in proximity to transit to reduce the number and length of trips in the region. As noted in Section 6.2 Growth Inducing Impacts, page 6-1, the changes in the Proposed Plan are not intended to induce growth. Rather, they respond to anticipated growth in the City and region as well as requirements to reduce greenhouse emissions (SB 375) by reducing the number and length of vehicle trips. The Proposed Plan also responds to the General Plan Framework. See Draft EIR Section 2.0 Summary: Project Characteristics page 2-2, Section 4.1 Land Use, and Section 4.2 Population, Employment, and Housing. The Proposed Plan identifies areas with sufficient transportation infrastructure and land uses to accommodate new growth and development. Directed growth in areas with existing transportation networks and different types of land use provides more opportunities for reducing vehicle trips and greenhouse emissions. Adjusting the land use designations, height districts, and zones not only accounts for projected long-term increases in population and housing units but also aligns with the General Plan Framework goals to protect single-family and low-density neighborhoods.

The commenter expresses concerns about more development in Hollywood and the potential for growth inducement. See Responses MR-1 and MR-3. The Draft EIR analyses the reasonable anticipated development that would occur under the Proposed Plan. The Planning Department does not look at growth inducing potential block by block, but rather growth inducing potential throughout the City. In light of recent legislation requiring reduction of greenhouse gas emissions (especially SB 375), the City is attempting to target areas of growth in the city while minimizing impacts to established neighborhoods.

48-4 Comments noted. See Response MR-3. Traffic impacts of the Proposed Plan are identified in Section 4.5. More detailed evaluation of specific locations within the planning area will occur as specific discretionary projects are proposed and reviewed.

48-5 The commenter expresses concerns about the removal of development limitations along the Barham corridor due to shallow lot depths and existing issues with traffic and parking.

The Proposed Plan recommends removing the development limitations on commercial corridors that were imposed by the 1988 Hollywood Community Plan. Removing the 1988



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development limitations is intended to accommodate anticipated growth as projected by SCAG for 2030 and allow for appropriate change in uses. Existing floor area ratio limitations along the Barham corridor place a maximum floor area ratio of 0.5:1. Staff is evaluating the land use recommendations along the Barham corridor, and the comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

The Draft EIR includes a programmatic analysis of traffic impacts (Section 4.5) of the proposed changes zoning within the Community Plan Area including this area. Area-wide traffic mitigation measures are proposed. However, site-specific impacts will be addressed through project specific review and additional mitigation measures may be required for individual development projects. The commenter's remarks about shallow lot depths are noted and will be forwarded to the decisionmakers for their consideration. See Response MR-3.

- 48-6 The comment addresses an area adjacent to the Hollywood Community Plan area. As noted, the MTA Station at Lankershim is a public asset that serves both NBC-Universal (a regional attraction) as well as the adjacent area. It does not fall within the boundaries of the Hollywood Community Plan. See the NBC Universal Evolution Plan Draft Environmental Impact Report and Metro/Universal Draft EIR for information concerning transit impacts of the proposed development. The commenter's opinions regarding the MTA asset becoming privatized are noted. See Responses 48-3 and MR-3. As noted on p. 4.5-22, the NBC-Universal project is included specifically in the traffic analysis included in Section 4.5. Mitigation measures that will be included in a Mitigation Monitoring Plan adopted at the same time as a project is approved will be required. The NBC-Universal Evolution Draft EIR and the Metro Universal Project Draft EIR have been circulated; neither has released a Final EIR as of the preparation of this Final EIR. The commenter expresses concerns about development proposals on the Metro Universal City Station parking lots. These developments are subject to their own environmental review and clearance and are outside of the boundaries of the Hollywood Community Plan.
- 48-7 See Response 48-6.
- 48-8 See Response 48-5. The commenter expresses concerns about the effect of removing development limitations on view sheds and the scale of development in the Vine/Franklin area. The comment is noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. The Proposed Plan recommends a height limit at the southwestern corner of the intersection of Argyle and Yucca. See Response MR-3.
- 48-9 See Response MR-1.
- 48-10 Comments noted. See Section 4, Corrections and Additions for pages 2-1 to 2-2 and page 3-3.

Regarding the description of Hollywood's parks in Table 2-2, a complete list of parks and recreational facilities in the CPA can be found in Table 4.3-8 on page 4.3-19. See Public Parks page 4.3-18. The fact that there may be existing joint-use agreements at certain school locations is beneficial but need not be addressed in this programmatic document.

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48-11 Table 2-2 provides a summary of impacts and mitigation measures. See Section 4.4 Utilities: Water Resources, page 4.4-1, addresses the city’s major sources of water. The Proposed Plan would affect Hollywood’s water infrastructure but as noted on page 4.4-9, “[t]he upgrading and/or expansion of existing local distribution systems may be needed at certain locations within the CPA.” Without understanding the details of specific development, impacts to water lines in the area cannot be determined. Impacts to Energy Resources are addressed beginning on page 4.4-9, including electrical supply and distribution. The Draft EIR notes on page 4.4-17, that, “the cumulative effect of the increased electrical service demands from additional development and an increasing population could require the installation of additional electrical distribution facilities.” Similar to water infrastructure, the location and type of new development will affect what new facilities are required. Project-specific review, including environmental review as appropriate, will address impacts to water and electrical facilities in the area. In addition, customer utility revenues throughout the life of the Proposed Plan will fund large-scale modernizations and maintenance. The Proposed Plan encourages the use of clean, renewable energy and energy efficient systems but also recognizes the importance of expanding and upgrading existing distribution lines as necessary.

48-12 Table 2-2 provides a summary of impacts and mitigation measures. See Section 4.4 Utilities: Wastewater System, page 4.4-19, and Solid Waste Generation and Disposal, page 4.4-27, for a more complete description of existing systems and mitigation measures. Page 4.4-26 indicates that, “It is anticipated that water conservation will lead to reductions in the amount of wastewater generated. Due to aging infrastructure replacement of sewer lines in the area can reasonably be expected with or without the Proposed Plan. The Proposed Plan may lead to the need for some localized sewer improvements to accommodate increased flows.” The nature and location of specific development will affect what localized infrastructure improvements will be necessary. Project-specific environmental review, as appropriate, will address localized impacts to infrastructure facilities. The City is on-track to achieve zero waste by 2025 through the Solid Waste Integrated Resources Plan (SWIRP), a 20-year master plan for solid waste management and recycling programs. The City is in the process of preparing the Draft EIR for public review in the fall of 2011. Encouraging an integrated waste management system will reduce the impact on existing sewer lines in the Hollywood area and Citywide.

48-13 See Responses 48-2 and 48-10.

The comment is noted regarding use of the term “public right of way.” Both public right of way in the general sense as well as public rights of way in referring to all rights of way in the CPA would be correct.

48-14 As noted by the commenter, Fire Station 97 does serve a small section of the Hollywood CPA. However, Table 4.3-3 only lists the fire stations that serve the Hollywood area and are located within the boundaries of the plan area.

48-15 Comments noted. Table 4.3-8 of the Draft EIR lists parks and recreational facilities managed by the City of Los Angeles Department of Parks and Recreation. As stated in Public Parks, page 4.3-18 – 4.3-19, park space provides the amenities of community and neighborhood parks and is characterized as mini, neighborhood, community, and regional. Briar Summit Open Space Preserve, though accessible by the public, is owned and operated by the Mountains Recreation & Conservation Authority (MRCA) and serves as a wildlife preserve.

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The park noted on Oakshire Drive is not located within the boundaries of the Hollywood Community Plan.

As stated in page 4.3-19, LAUSD recreational facilities are occasionally used by the Department of Recreation and Parks. Though beneficial to residents of the Hollywood CPA, the joint-use of recreational facilities does not replace the city parks and recreational facilities. See comment 48-10. The existing joint-use agreement between LAUSD and the Department of Parks and Recreation limits the use of Helen Bernstein High School's recreational facilities to the synthetic turf multi-purpose field and adjacent restrooms for the summer period, while school is not in session. While there are multiple joint-use agreements in place between LAUSD a master joint-use agreement for the entire City has not yet been drafted.

On page 4.3-20, CF5.53 "open Space" is changed to "Open Space."

48-16 The commenter expresses concerns regarding inadequacies of public facilities, such as libraries and required mitigations. This Final EIR includes a Mitigation Monitoring and Reporting Program (MMRP) that identifies for each measure the agency responsible for implementation and when each measure will be implemented. See Response MR-2. Also, see Section 4.3 Public Services for mitigation measures concerning fire and police protection services, public parks, libraries, and schools. All policies related to funding and improvement of public facilities function in the larger framework of Citywide public services. Funds for expansion, improvement, and general maintenance are allocated to specific facilities as deemed necessary by Citywide departments.

48-17 The commenter indicates that the existing LADWP electrical distribution facilities for Hollywood are inadequate, especially in the Hollywood Hills West Neighborhood Council area, and that the Draft EIR does not adequately analyze this environmental impact of the Proposed Plan. The DEIR analyzes electrical distribution facilities at the community plan level.

LADWP has initiated a Power Reliability Program to replace aging infrastructure and make permanent repairs. Resources will be directed to programs that result in the maximum amount of increased reliability. As development occurs, incremental improvements and upgrades will take place under the direction of LADWP. Customer revenues throughout the life of the Proposed Plan will fund large-scale modernizations and maintenance.

Table 4.4-8 shows the annual electricity consumption for 2005 and projections for future scenarios. Empirical data is taken from average consumption rates by land use and calculated according to the AQMD Handbook for Preparing EIRs, published by the South Coast Air Quality Management District. Projected growth will create a greater demand for electricity, mitigation measures identified on page 4.4-19 address the maintenance and expansion of distribution lines and facilities as well as the integration of energy efficiency, conservation, and alternate sources. The commenter's concerns will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 48-11, 48-16, and MR-2.

48-18 The commenter correctly identifies many special events that occur at venues in Hollywood, including those that result in street closures. The Hollywood Community Plan Mobility Policies address the need to better manage special events and provide better information to

- travelers to avoid temporary traffic congestion associated with events. The analysis in the Draft EIR is focused on P.M. peak period conditions on typical days, which is typical in area-wide planning studies and was appropriate to assess potential impacts based on the thresholds of significance that were adopted by the City for use in this EIR.
- 48-19 Comments noted. The Draft EIR includes noise measurements (see Table 4.7-1) that characterize the general noise environment in the Hollywood CPA. As noted on page 4.7-4, the area is characterized by general traffic noise. As noted on page 4.7-10, the Hollywood area is well outside the 65 dBA noise contour of the Burbank-Glendale-Pasadena Airport. While the flight path of planes leaving and entering the airport may result in audible aircraft noise in the plan area, it is generally not a dominant source of noise. The purpose of the Hollywood Community Plan Update EIR is to determine the impact of the Plan on noise. Noise from the local airports would not be affected by the Plan but rather would remain an ongoing source of noise irrespective of the Plan and, therefore, need not be addressed in detail. Similarly, helicopter noise is an occasional annoyance to sensitive receptors throughout the City including within the Hollywood CPA. See Section 4, Corrections and Additions for a paragraph added to the EIR regarding aircraft noise.
- 48-20 Comments noted. The Final EIR addresses commenters concerns and adds new information to address commenters concerns. While the commenter has raised a number of good points, none of them result in the identification of new significant impacts and thus recirculation of the Draft EIR is not warranted. See Response MR-3.
- 48-21 See Responses 48-20. The commenter's concerns regarding small lot subdivisions are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 48-22 See Response 48-20. The commenter's concerns are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 49. Terry L. Hake Church, June 1, 2011**
- 49-1 Comment noted. See Response MR-3.
- 49-2 See Response MR-1.
- 49-3 Comments noted. The Proposed Plan will require findings pursuant to Charter Section 556 and 558 as consideration for final adoption. Comments regarding compatibility with these Charter Sections and other elements of the General Plan will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 49-4 The commenter states that the City's infrastructure has not been monitored in over 11 years and cannot handle existing user demand. The Hollywood Community Plan Update Draft EIR analyzes impacts to public services and infrastructure that are expected over the life of the Proposed Plan.

The Planning Department provides quarterly and annual data on building permit activity regarding: single-family and multi-family dwelling units; commercial office, retail and industrial floor space; new buildings, additions/alterations, and building demolitions; net

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changes to building inventory; and new or adaptive reuse housing by community plan. The Planning Department also provides annual estimates of population by community plan. City departments access these data to prepare their plans for service and infrastructure delivery. The respective departmental plans are available online on the City's website at [www.lacity.org](http://www.lacity.org).

The commenter expresses concerns that the neither the Draft EIR nor the Proposed Plan have a proposal for monitoring infrastructure and the effectiveness of the Proposed Plan. This Final EIR includes a Mitigation Monitoring and Reporting Program (MMRP) that identifies for each measure the agency responsible for ensuring the measure is implemented and when each measure will be implemented.

The Draft EIR adequately assesses the current capacity of infrastructure and impact of implementing the Proposed Plan. Local improvements, expansion, and construction of new facilities are scheduled as necessary by appropriate agencies. See the Draft EIR Section 4.4 Utilities, page 4.4-1. The commenters' concerns will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See also Response MR-2.

49-5 See Response MR-1.

49-6 Comment noted. Increasing allowable density in areas adjacent to transit and areas equipped with adequate infrastructure is appropriate. Changing zone designations is not anticipated to induce growth (except possibly in a very localized manner). Rather, it is anticipated to direct anticipated growth into appropriate areas as the population or number of housing units increases. The methodology used to analyze build out capacity of existing residential zones can be found on pages 4.2-2 and 4.2-3 of the Draft EIR. See Response MR-1.

49-7 See Response 49-4.

49-8 Comment noted. See Response MR-3.

**50. Don G. Howard, May 27, 2011**

50-1 See Response 39-1.

**51. Edward Villareal Hunt, Comments to ENV-200502158-EIR, Hollywood Community Plan Update, June 1, 2011**

51-1 Comment noted. The commenter states that the Proposed Plan will increase the number of projects that are approved by right. The commenter further expresses concern over any decrease in community involvement in the planning process. These comments will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

51-2 See Response MR-1.

51-3 See Responses MR-1 and MR-3.

51-4 See Response MR-1.

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- 51-5 The commenter expresses concerns regarding proposed increases in floor area ratios on Melrose Avenue. The proposed FAR of 1.5:1 is the Citywide standard ratio for commercial zones in Height District 1. To address concerns regarding the transition between commercial uses and single-family properties in historic neighborhoods, Policy LU.1.7, page 57, of the Proposed Plan proposes to maintain height limitations on commercial zones that border recognized historic neighborhoods. See Response MR-3.
- 51-6 The commenter expresses concerns regarding the proposed FAR Incentive Area along Western Avenue between Melrose Avenue and Santa Monica Boulevard and the transition between incentivized commercial areas and adjacent residential properties. Western Avenue is a Secondary Highway served by a Metro Rapid bus that connects with the Red Line at Western Avenue and Hollywood Boulevard. The Proposed Plan supports increased density in areas of Hollywood served by transit infrastructure where appropriate. The commenter's concerns regarding the transition between commercial uses and low-scale residential neighborhoods will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. Staff is currently evaluating additional regulations for building scale in this area (any changes to the Proposed Plan are not anticipated to significantly change analyses or conclusions of the Final EIR). See Response MR-3.
- 51-7 The comments regarding the contents of a letter sent by the Hollywood Studio District Neighborhood Council in 2006 are noted. The Proposed Plan promotes the preservation of historic and culturally distinctive neighborhoods and supports land use policies that encourage infill development. See Chapter 3 Land Use Plan, Goal LU.1, Page 55 of the Proposed Plan. Issues relating to quality of life, traffic easing, and parking are further addressed in the Proposed Plan, Chapter 4 Mobility Plan, Page 103 and the Plan's TIMP.
- 51-8 Comment noted. See Response MR-3.
- 52. McQuiston Associates, J.H. McQuiston, Statement of J.H. McQuiston on Draft EIR 2005-2158 Hollywood Community Plan Revision, May 26, 2011**
- 52-1 Comment noted. See responses to detailed comments below. The Draft EIR and this Final EIR comply with the requirements of CEQA.
- 52-2 Details regarding data and methodology used in the Draft EIR can be found in Section 4.2, Population, Employment, and Housing. The comment regarding discrepancy between data in the Proposed Plan's Draft EIR and the EIRs of the 1988 Plan and the SNAP are noted. Calculations of industrially designated acreage involve estimations of average FAR and estimates of the percentage of industrially-designated land that is actively available for industrial use, i.e. not used for parking, side yards, etc. Differences in estimates may reflect differences in assumptions used. SCAG is in the process of updating its projections consistent with the requirements of AB 32 and SB 375. In order to reduce greenhouse gas emissions, the State, region, and the City must encourage efficient development that uses fewer resources (energy, water). Multi-family development is typically more efficient than single-family development and development located adjacent to transit (as in Hollywood) generally results in fewer auto trips and more transit trips. The proposed Hollywood Community Plan Update is generally consistent with current SCAG policies promoting smart development. See Response MR-1.
- 52-3 Comment noted. See Response MR-3.
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- 52-4 The commenter provides information on the background of Hollywood as well as its film and radio industry as a beneficial source of growth for the economy of this neighborhood. The Draft EIR presents a general analysis of anticipated land use changes. Specific changes in land use will need to be separately reviewed as projects are proposed and reviewed through project-specific environmental review and entitlement actions. The commenters' opinions are noted. See also Response MR-3.
- 52-5 The commenters opinions are noted. See Responses 52-2 and 52-4. The Draft EIR does not address segregation. See Responses MR-1 and MR-3.
- 52-6 See Responses 52-2, 52-4, MR-1, and MR-3. The commenter states that the Draft EIR failed to show that cutting industrial capacity is "environmentally-conservative." The Draft EIR analyzes the impact of changes in industrial designations in Section 4.1; page 4.1-8 of the EIR identifies that Industrial land in the CPA will decrease by 13.6 acres (or 0.08% of the CPA). Half of this reduction is due to re-designating industrial land used for the Helen Bernstein High School to Public Facilities. The remainder is due to changing an industrial designation to a commercial designation at Sunset and Gower on commercially-zoned parcels to make the land use designation match the zone and promote mixed-use. The Proposed Plan contains several policies to preserve industrial land – see Policies LU.1.1 and LU.1.2 on page 55 and Policy LU.2.30 on page 83 of the Proposed Plan. Comments supporting the preservation of existing industrial land will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.
- 52-7 Comment noted. See Response MR-3. LAUSD conducts its own school siting and planning process. The Draft EIR was circulated to LAUSD. They did not provide any comments. Impacts to local schools are addressed in Section 4.3.
- 52-8 See Responses MR-3 and 52-2. The 2030 population forecast comes from SCAG's 2004 RTP. Projections of housing, commercial and industrial square footage, and employment were estimated by staff using 2000-2006 building permit data and Standard Industrial Codes. The comment regarding strong economic growth during 2000-2006 is noted. The commenter's references to various legal cases involving zone changes are also noted.
- 52-9 Comment noted. See Responses MR-3, and 52-2 above. The Draft EIR provides a generalized programmatic analysis of development anticipated under the proposed Plan. Site-specific environmental review will be required as specific discretionary approvals are sought.
- 52-10 Comment noted. Summer employment is a part of the overall employment picture discussed in the EIR in Section 4.2. Specific analysis of summer employment in Hollywood as a result of the Proposed Plan would be speculative and, therefore, not appropriate for this programmatic document.
- 52-11 Comment noted. See Response MR-3.
- 52-12 The commenter provides a history of planning documents in Hollywood, including the Gruen report prepared in conjunction with the 1988 Plan, the Vermont Western Station Area Neighborhood Plan of 2001, and the General Plan Framework. See Response MR-3.

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- 52-13 See Response MR-1 for an explanation of how the Proposed Plan would be consistent with goals of the General Plan Framework. See also Responses MR-3 and 52-2 above. Impacts to police, fire, parks, and other public services are identified in Section 4.3. Police Protection Policies in the Proposed Plan include CF.5.10-CF.5.16. Program LU.4.1.1 of the Proposed Plan recommends a nexus study for the purpose of funding parks in Hollywood. Improving the jobs-housing balance is addressed by Policies LU.2.8 and LU.2.9 in the Proposed Plan.

Geologic impacts and seismic hazards are addressed in Section 4.8 of the Draft EIR. California is seismically active; both the State and the City of Los Angeles have stringent building requirements designed to address these conditions. Community plans deal primarily with land use not detailed construction requirements which are addressed in site-specific analyses and building codes. Traffic impacts are analyzed in Section 4.5 of the Draft EIR and in the TIMP (Appendix C of the Draft EIR).

Making streets walkable to promote pedestrian activity is one of the major goals of the Proposed Plan, see Policies LU.3.1-LU.3.28. See Response 66-1 regarding childcare.

The Proposed Plan promotes jobs in Hollywood in several ways, for example by increasing the number of acres designated for commercial use by 5 acres and creating vertical space for jobs by recommending Floor Area Incentive Areas in the areas designated as Regional Center and along commercial corridors served by transit. The Proposed Plan also protects the majority of the referenced Hollywood Media industrial area from residential intrusion. See Proposed Plan Policies LU.2.10 – LU.2.16.

- 52-14 Comment noted. See Responses MR-1, MR-3, 52-2, 52-7, and 52-13. Since 1988, the Metro Red Line has opened and provides Hollywood residents and employees with convenient transit access to and within the area. Considerable cross-town traffic continues to pass through Hollywood. As Hollywood street traffic corridors receive mitigations and improvements, they often become a desirable alternate to other cross-town streets. Thus, even if Hollywood decreases automobile trips, continued heavy traffic in the area can be expected because of the cross-town demand. Parking demand is not a physical environmental impact under CEQA unless it results in other impacts (congestion, air emissions, etc.). The Draft EIR analyzes traffic impacts based on existing street configurations including parking restrictions.

The commenter states that the Vermont Western Station Neighborhood Area Plan (SNAP) creates a jobs-housing imbalance. Three of the commercial designations in the SNAP allow for higher FAR and more employment than that typically found in the remainder of the Hollywood Community Plan outside Hollywood's Regional Center. FARs for commercial uses in SubArea B and SubArea C of the SNAP are higher than those allowed for Limited Commercial, Highway Oriented Commercial, and Neighborhood Commercial designations outside of the SNAP.

The commenter alleges that the Proposed Plan encourages more single-room dwelling units but does not identify which part of the Proposed Plan to which he refers. The Proposed Plan encourages more housing capacity but does not necessarily encourage single-room dwelling units. See Response 52-13 regarding the plan's protection of the Media District industrial area.



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- The commenter's remarks about the effect of garage conversions and preferential parking districts on neighborhood on-street parking deficits are noted. See Response MR-3.
- 52-15 The commenter recommends rezoning Normandie for neighborhood commercial uses. The Proposed Plan supports the retention of affordable housing in this dense multifamily neighborhood. See Response MR-3.
- 52-16 The commenter recommends widening Melrose from Western to the 101 Freeway. The Proposed Plan's Modified Street Standards has recommended retaining the planned 90-foot right of way for Melrose from Fairfax to Vermont. See Response MR-3.
- 52-17 The commenter's opinions regarding changes on Mariposa at Santa Monica are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
- 52-18 The commenter recommends vacating various street segments for the purpose of creating public recreational facilities. The Proposed Plan opposes the vacation of streets for private use. The commenter's recommendation is noted and will be forwarded to the decisionmakers. See Response MR-3.
- 52-19 The commenter states that no C2 zoning is allowed in the Vermont/Western Station Neighborhood Area Plan (SNAP). The proposed Hollywood Plan does not modify the existing SNAP. In SubArea D, the CM zone prohibits specified C2 uses and in SubArea E C2 uses are prohibited. C2 zoning and uses are allowed in SubAreas A, B, and C. See Response MR-3.
- 52-20 The commenter's opinions on the Vermont-Western Station Neighborhood Area Plan and Ordinance 173748 are noted. The commenter proposes additional policy ideas that are noted and will be forwarded to the decisionmakers for their consideration. See Responses 52-19 and MR-3.
- 52-21 The comment that not all of the commenter's concerns are addressed in the comments is noted; however, only the comments presented can be addressed herein. Also, the obligation for concerned jurisdictions to assist the State under the Alquist-Priolo Act is noted. The focus of the definition is to help the public to understand Alquist Priolo Zones.
- 52-22 See Section 4, Corrections and Additions for page xii.
- Page xii, under the definition of Faults is correct and the commenter's opinion is noted. Page xiii, section Geologic Hazards (Seismicity) is correct and commenter's response does not directly apply to geological hazards.
- The commenter's request to add "including the CRA Area" is not clear; therefore, no response can be provided.
- Page xv, SCAG 2030 Forecast is correct and the commenter's opinion is noted.
- Page 1-1, section 1.1 is correct and the commenter's response to include the adaptation of the HCP in 1986 does not directly affect the statement since the Plan was written to plan

development occurring between the years of 1988 and 2010 (see page 2-1, section 2.0, Overview).

The commenter's opinion on the uniformity with regional transportation in the Hollywood economy, on page 1-3, section 1.4 is noted and forwarded to the decisionmakers. See Response MR-3.

The commenter's opinion to delete "Hollywood is a prime location for transit-oriented development," on page 2-1, Section 2.0, Overview, is noted. One objective of this Community Plan Update is to "Encourage sustainable land use in proximity to transit." (page 3-5); therefore, this sentence is a correct statement and no change is appropriate. See Response MR-3.

See Section 4, Corrections and Additions for page 2-1 and Franklin Avenue.

Regarding correction on page 2-2, section 2.0, Project Location, see Response 48-10.

The commenter's concern regarding major corridors and the unsolved bottleneck for transportation are noted.

See Section 4, Corrections and Additions for page 2-2 and bus lines.

On page 2-2, Section 2.0, Existing Transportation System, the commenter's opinion regarding the terms "neighborhood" and "network of bicycle routes" are noted; however, the language as presented is considered more appropriate.

The commenter's language changes regarding transportation and mixed-use development on page 2-2, Section 2.0, Project Characteristics, are noted. See Response MR-3. The planning department believes the text as written is correct.

On page 2-3, Section 2.0, Project Characteristics, the sentence, "the Proposed Hollywood Community Plan recommends removing and/or revising development limitation on commercial zones and multi-family residential zones" is correct, since the plan is providing options for these zoned areas. See also Response MR-3.

52-23 Commenters suggested edits to the Project Objectives on page 2-5 are noted. The Planning department believes that the Objectives are appropriate as presented.

It is not appropriate to remove the identified paragraphs from pages 2-6 and 2-7 since they provide detailed explanations on the importance of the specific Project Goals and Objectives.

The term "consider" on page 2-7, Alternatives, is correct and in direct link with the context of the material provided.

Comment noted on page 2-7, Alternative #1; however, it is not appropriate to remove the noted paragraph since it provides efficient and necessary information on the importance of this alternative to the overall Hollywood Community Plan.

Comment noted in regards to Alternative #2 on page 2-7. See Response MR-3.

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Comment noted regarding the SCAG 2030 Forecast. See Responses MR-1 and MR-3.

Comments regarding the TIMP are noted. See Response MR-3.

Comments noted on Table 2-2 on page 2-9. This is a summary table of project impacts that is further expanded upon within each section of the Draft EIR. Alternatives are addressed in the Alternatives chapter of the Draft EIR.

52-24 The title “Project Description” on page 3-1 meets the requirements of CEQA and no change is necessary. The commenter does not provide information supporting the issue raised regarding “3.2 Table 4.2-3”; therefore, no further response can be provided. The commenter’s opinions regarding changing the placement of Section 3.4 on page 3-5 are noted. See Responses MR-1, MR-2, and MR-3.

52-25 The commenter expresses opinions on a variety of issues related to the Draft EIR and the Proposed Plan and makes detailed comments about subareas where land use changes are proposed. The commenter asks whether the estimates of acreage by land use designations in Section 4.1 reflect changes made since the existing Hollywood Community Plan was adopted in 1988. The baseline year for the Proposed Plan is 2005, and the estimates of acreage by land use designation reflect estimates for that year. The commenter’s opinions regarding presentation of data using total acres and percentages are noted. The Planning Department believes that the presentation of data is appropriately informative and discloses impacts in an adequate and appropriate manner such that significance may be determined. Estimates of Floor Area Ratio by land use designation were used to analyze environmental impacts of the Proposed Plan in many Chapters of the DEIR.

In Section 4.2: Population, Employment, and Housing, estimates of changes in Floor Area Ratio by land use designation were used to estimate changes in square footage of commercial and industrial development and employment. This methodology is explained under Impact Assessment in Section 4.2. Estimates of changes in employment and square footage of commercial and industrial development were used to analyze impacts of the Proposed Plan on water resources, electricity and natural gas consumption, energy resources, wastewater generation, solid waste generation, air quality, noise, and traffic.

Thresholds of significance are presented on page 4.1-4; discussions of land use address these issues from a community plan (as opposed to a site specific) perspective. As noted on page 4.8-14 in the discussion of mitigation measures for Geology, “[a]dherence to all relevant plans, codes, and regulations with respect to project design and construction would reduce project-specific and cumulative geologic impacts to a less than significant level.” The commenter states that the Proposed Plan is inconsistent with the General Plan in terms of parks, transportation, and other matters, without specifying how the Proposed Plan is inconsistent with the General Plan. See Response MR-3.

Comments on SubAreas where changes in land use are proposed:

<b>SubArea Comments</b>	<b>Responses</b>
<b>Response to Comments on Draft EIR</b>	
5, 5:2, 5:3,5:3A, 5:3B, 5:4, 6:1, 6:2, 6:3	Commenter states that SubAreas 5, 5-2, 5-3, 5-3A, 5-3B, 5-4, 6-1, 6-2, and 6-3 are located within a quake danger zone. The Draft EIR analyzed the additional seismic risks to the population and impacts associated with the implementation of the Proposed Plan and determined that these risks would be minimal – see Section 4.8 – Geology. The closest Alquist-Priola Earthquake Fault Zone to the Hollywood Community Plan area is the Newport-Inglewood fault zone, located five miles south of the Hollywood Community Plan area.
21-34	Commenter states that the assessment of impacts on SubAreas 21-34 was inadequate. The Draft EIR analyzes the Hollywood Community Plan area as a whole. Environmental impacts at the local level will be analyzed by project-specific analysis when discretionary development is proposed.
	Clarifications of the Hollywood Community Plan Update:
10:1D	Commenter states that the C2 zone is not allowed by the SNAP. SubArea 10-1D is located in the SNAP's SubArea C Community Center. Commercial uses permitted in the C4 commercial zone are permitted on any lot within this part of the SNAP. C2 uses are not prohibited.
18:4	Commenter states that SubArea 18-4 is an MR zoned street. SubArea 18-4 is zoned C2 in a Medium Residential land use designation. The Hollywood Community Plan Updates corrects this inconsistency, properly re-designating the land use designation for these parcels as General Commercial.
31:1A	Commenter states that the C2 zone is not allowed by the SNAP. SubArea 31-1A is located in the SNAP's SubArea C Community Center. Commercial uses permitted in the C4 commercial zone are permitted on any lot within this part of the SNAP. C2 uses are not prohibited.
31:4	Commenter states that the C2 zone is not allowed by the SNAP. SubArea 31-4 is located in the SNAP's SubArea C Community Center. Commercial uses permitted in the C4 commercial zone are permitted on any lot within this part of the SNAP. C2 uses are not prohibited.
42:4	SubArea 42-4 is not in the SNAP.
40	The Draft Hollywood Community Plan retains the MR-1 zone in SubArea 40. A Qualified (Q) Condition is proposed to prohibit residential uses, such as live/work, and protect industrial uses.
<b>Comments on Proposed Plan Forwarded to Decisionmakers for Review and Consideration.</b>	
9:2	Commenter notes that the land use change proposed for SubArea 9:2 requires a SNAP amendment. Comment will be forwarded to the decisionmakers for their review and consideration. See Response MR-3.
9:1	Commenter notes that the land use change proposed for SubArea 9:1 requires a SNAP amendment. Comment will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.
11:1	Comment regarding Floor Area Ratio within the SNAP will be forwarded to the decisionmakers for their consideration. See Response MR-3.
<b>Commenter's Opinions about the Hollywood Community Plan Update</b>	
6, 13:3C, 23:4B, 9:3, 23:4A, 3:2B, 3:2F,	Comments noted; they will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See response MR-3.

SubArea Comments	Responses
3:2G, 3:3,4:7, 25:3, 41,13:1I, 13:1J, 13:1K, 7A, 18:5, 19:A, 19:2,19:2A, 42:3, 4:8A, 4:8B, 4:8C, 13:5A, 13:5B, 13:5C, 13:6A, 42:1A, 2:1,4:5D, 17:3, 39:3, 39:4, 40:2A, 40:2B, 40:4B, 40:2E, 4:1, 24, 1:4, 1:4A, 14:1, 14:2, 20, 20A	

52-26 The Vermont/Western Station Neighborhood Area Plan (SNAP) is a pre-existing Specific Plan whose development review procedures are not being amended by this action.

The Hollywood Plan, as an element of the General Plan, provides general policy guidance for development in the area; individual projects and developments requiring discretionary approvals will require project-specific review to ensure compliance with those general guidelines.

Information regarding transportation and traffic are included in the Draft EIR in the designated area on page 4.5-22 under the Assessment section.

The City may use public and private funding programs, as stated on page 4.3-22 under Mitigation Measures, in order to positively impact the recreational facilities available to the residents of Hollywood CPA

52-27 See Response MR-1.

52-28 The Draft EIR addresses through-traffic as one of the critical issues that causes Hollywood streets to remain at or above capacity even when capacity enhancements were modeled in the TIMP analysis. As noted on page 4.5-33, “As noted earlier, a large percentage of traffic in the Hollywood planning area in the year 2030 is anticipated to be traffic passing through the Hollywood CPU area. This is reflected in the mixed results in terms of highway performance for the Proposed Plan. Some statistics are improved (e.g. Hollywood-generated vehicle trips are reduced, as some trips would be converted to non-auto trips), but other statistics are not significantly affected by the localized land use changes, due to the effect of through traffic which fills the streets of Hollywood as capacity is “freed up” by the reduction in local trip generation.”

52-29 Statements regarding fire protection services, police protection services, libraries, and parks are noted and forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses MR-2 and MR-3. Also, see Responses 7-1 and 15-19 regarding police services and budget resources. The Mitigation Measure section on page 4.3-5 is correct.

Specific policies and plans relevant to the land use and environmental impacts of LAUSD are provided on page 4.3-40, section Relevant Policies of the Proposed Community Plan, and specifically articles CF.5.34, CF5.35, CF.5.39, CF.5.41, CF.5.42, CF.5.43, and CF.5.44.

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The commenter's statements regarding wind, solid waste conversion, water, and power are noted and will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-3.

- 52-30 A curb parking lane is considered a travel lane on streets where parking is prohibited during peak periods and when it is striped as a travel lane adjacent to the curb. There are many examples in Hollywood of peak period travel lanes that serve as parking lanes in the off peak hours. The Hollywood Community Plan does not propose the removal of on-street parking. Please refer to Response 18-15 with regard to the modeling methodology and to Response 15-40 with regard to dates of baseline conditions.

The Draft EIR discusses Air Quality starting on page 4.6-1, Topography and Climate.

- 52-31 The commenter's observation regarding geology and the comment on Map 4.8-1 are noted and forwarded to the decisionmakers for further their consideration in taking action on the Proposed Plan. See Response MR-3.

As stated in Section 4.8 Geology and Soils, the entire southern California area is considered a seismically active region and prone to surface rupture. There are both active and potentially active faults located within, or in close proximity to, the Hollywood Community Plan Area, with the closest Alquist-Priolo Earthquake Fault Zone, the Newport-Inglewood fault zone, located approximately five miles south of the Hollywood area. The highest seismic risks originate from the Hollywood fault zone, the Santa Monica fault zone, and the Newport-Inglewood fault zone. Given the project area's location and existing risks of seismic activity, the anticipated new growth in the community is likely to experience some seismic activity. However, implementation of the Proposed Plan would not increase the frequency or intensity of seismic activity nor result in a significant change from current levels of risk. Project specific reviews and adherence to all relevant plans, codes, and regulations with respect to project design and construction are anticipated to reduce seismic and geologic impacts to a less than significant level.

- 52-32 The commenter's opinion regarding the revision of Alternatives on page 5-1 for the final draft is noted. See Response MR-3.
- 52-33 The commenter opines that the quality of life as a consideration that was not adequately assessed under Section 6.0, "Other CEQA Considerations." The Draft EIR analyzed the proposed project's impacts on the physical environment and how those might impact the quality of life of the residents in the community plan area. The land use policies, for example, seek to maintain and improve the existing community's distinctive character and its livability while accommodating anticipated growth and the need for economic vitality. The public services section analyzes the impacts on areas such as the ability to provide public safety, recreation, education, etc. The public utilities section analyzes the impacts on factors such as an adequate water supply, power, wastewater and solid waste disposal services. These are all factors that have the potential to impact the quality of life of the residents, and each is analyzed in the Draft EIR.

The "Other CEQA Considerations" section, beginning on page 6-1 of the Draft EIR include the detailed and precise reasoning, significant and unavoidable impacts, less than significant impacts, significant irreversible environmental changes resulting from project implementation, and the cumulative impacts that are anticipated upon adoption of this Plan.

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52-34 Comments noted. This Final EIR contains additional information and numerous revisions. None the additional information and revisions identify new significant adverse impacts; thus, recirculation of the Final EIR is not warranted.

**53. Debra Nodelman, May 27, 2011**

53-1 See Response 39-1.

**54. Caroline Pintoff, Re: May 27, 2011**

54-1 See Response 39-1.

**55. Lynn Pirtle, May 27, 2011**

55-1 See Response 39-1.

**56. Richard H. Platkin, undated.**

56-1 Comments regarding the General Plan Framework are noted. See Responses 15-1, 23-13, 49-3, MR-1, and MR-3.

56-2 Section 4.1 of the Draft EIR analyzes land use and each subarea of proposed change. Section 4.2 of the Draft EIR analyzes population, employment and housing. Table 4.2-2 provides an analysis of existing and proposed levels of reasonably expected development capacity. See also Response MR-1.

56-3 See Responses MR-1 and 49-6.

56-4 See Responses MR-1 and 49-6.

56-5 Comment noted. The commenter's request that the General Plan Framework be updated will be forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Response MR-1.

56-6 See Responses 48-3 and 49-3.

56-7 See Response 49-4.

**57. Jay Pirincci, undated**

57-1 The commenter's suggestion for modifications to the slope-density language of the Hollywood Plan text is noted and forwarded to the decisionmakers for their consideration. See Responses MR-1 and MR-3.

**58. Richard Spicer, member, GGPNC's PZHP Committee, May 31, 2011**

58-1 The commenter asks a number of questions that do not relate to adequacy of the Draft EIR. These questions are addressed outside the CEQA process.

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**59. Claire Torlel, May 27, 2011**

59-1 See Response 39-1.

**60. Barbra Turner, June 3, 2011**

60-1 See Response 39-1.

**61. Nicholas S. West, June 3, 2011**

61-1 See Response 39-1.

**62. Sunland-Tujunga Neighborhood Council Land Use Committee, Karen and Tom Zimmerman, Public Comment: Hollywood Community Plan, June 1, 2011**

62-1 Comment noted. See Responses 48-3, 49-3, 49-5, MR-1, and MR-2.

**63. Gordon Hessler, May 27, 2011**

63-1 The Commenter recommends re-designating North Gardner Street from Hollywood Blvd to Franklin Avenue, currently planned as a Secondary Highway with 90 feet of right-of-way, as a local street in order to reduce traffic. The Draft Hollywood Community Plan's Modified Street Standards propose to re-designate this segment of North Gardner Street as a Modified Collector with 50 feet of right-of-way to match the current existing dimensions. To address the commenter's concerns regarding traffic Program M.1.87.1 in the Draft Hollywood Community Plan's Mobility Plan will be revised so that this segment of North Gardner Street will be included in the neighborhood traffic management plan stud area. By extending the northern border of the proposed study area from Hollywood Blvd. to Franklin Avenue, the commenter's concerns regarding Franklin Avenue from Gardner Street to La Brea Avenue will also be addressed.

**64. Carol Sidlow, May 31, 2011**

64-1 Comment noted. The Hollywood Community Plan does not include any provisions that would modify conditions at Wonderland Elementary School. It is the responsibility of LAUSD to monitor traffic and parking conditions, which vary by school and by year depending upon attendance, and to work with LADOT to make changes to traffic patterns and parking situations to respond to those changing conditions.

64-2 Comment noted. The ATSAC system is designed to improve traffic flow along corridors with multiple traffic signals. It allows the traffic signal controllers to adjust timing plans to respond to different traffic patterns at different times of the day. The surveillance cameras also allow traffic managers to monitor conditions in the field. In areas like Laurel Canyon where the intersections are spaced at great distances and progressive movement is not directly affected by adjacent signals, the benefits of tying the signal controllers into the ATSAC system would not be very noticeable. Not all intersections in the Hollywood area have ATSAC.



**65. Nadia Conners, May 25, 2011**

65-1 Comment noted and forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan. See Responses 16-1 and 21-8.

**66. Land Use Coalition of Public Counsel’s Early Care and Education Law Project, Allen W. Hubsch, May 16, 2011**

66-1 Comments noted. The Proposed Plan identifies (in Policy CF.5.68) the importance of “adequate, accessible health services and social services to meet the needs of Hollywood residents.” Policy LU 4.25 indicates that the Plan supports, “the provision of community facilities to be used for bicycle amenities, adult and child daycare, community meetings and other community purposes.” Privately-run child care services and day care facilities are allowed in R4 Multiple Dwelling zones and commercial zones and are subject to permit and license fees from the Fire Department, Building and Safety, and the City Clerk. The Proposed Plan allows for the provision of childcare facilities at an appropriate level for a community planning document. Staff is evaluating revisions to policy text to clarify the importance of childcare services.

**67. East Hollywood Neighborhood Council, David Bell, President & Doug Haines, Chair, Planning Entitlement Review Committee, May 31, 2011**

67-1 See Response 2-2. The commenter’s request for the downzoning of additional parcels to RD2 or RD1.5-XL is noted and forwarded to the decisionmakers for their consideration in taking action on the Proposed Plan.

**68. [Q] Condition Petition, Residents of Harold Way & Serrano Ave Sub-areas 9:1, 25:3, 23:4, and 23:4A, received June 1, 2011**

68-1 The commenter’s request that parcels be downzoned to RD1.5-XL is noted. The commenter’s request that existing Q qualified conditions be retained is noted. Staff is evaluating revisions to land use recommendations. Comments shall be forwarded to the decisionmakers for further consideration. See Responses 25-1 and MR-3.

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## 4.0 CORRECTIONS AND ADDITIONS

CEQA Guidelines section 15088.5 requires:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability . . . "Significant new information" requiring recirculation include, for example, a disclosure showing that:
  - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
  - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
  - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
  - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

In response to public comments received as well as staff-initiated text changes, Corrections and Addition have been made to the Draft EIR. Also, additional information has been suggested in comments to the Draft EIR and responded to in Chapter 3 of this Final EIR. All of the public comments to the Draft EIR as well as the Additions and Corrections to the Draft EIR have been carefully reviewed to determine whether recirculation of the Draft EIR is required. All of the new information in Corrections and Additions to the Draft EIR and in the comments and in the responses to comments merely clarify or amplify or make insignificant modifications in an adequate Draft EIR. Therefore, the Draft EIR need not be re-circulated prior to certification.

In general in the following corrections and additions, new text is underlined, and deleted text is shown in strikeout font.

**COVER**

The description of the project location on the cover page, in Section 2.0, page 2-1, and Section 3.3, page 3-3, is revised to indicate “south” rather than “east” of Mulholland Drive.

**DEFINITIONS**

Page xii, in the definition of the Existing Hollywood Community Plan, the first sentence is revised as follows: “through the General Plan Zoning Consistency Program” is changed to “through Special Plan, Charter and General Plan Zoning Consistency.”

**INTRODUCTION**

Page 1-4, the following is added after the first sentence under the subheading "*Impact Assessment*:"

The Hollywood Community Plan EIR is a Programmatic EIR. Subsequent discretionary actions will require additional environmental review and documentation as appropriate. The thresholds of significance used in the analysis of impacts are based on CEQA Appendix G and the City's adopted CEQA Thresholds. Thresholds have been tailored in places as applicable to a programmatic environmental analysis for a long-range planning document. Analyses of several service providers include discussions of previously established service ratios (such as police officers per 1,000 population). These service ratios are changing as new methods, equipment and technologies become routine, and therefore, compliance with these service ratios are generally not used as thresholds of significance.

**SUMMARY**

Page 2-1 (and page 3-3), under the subheading Project Location, “border to Franklin Boulevard” is changed to “border to Franklin Avenue.”

Pages 2-1 to 2-2 and Section 3.3, page 3-3, the Project Location is revised to indicate “Santa Monica Mountains Range” and “Los Angeles Rivers.”

Page 2-2, in the second paragraph of the description of the Existing Transportation System the word “primarily” is replaced with “primary.”

Page 2-2, Section 2.0, Existing Transportation System, “a Commuter Express Bus and numerous local bus lines” is to change to “a Commuter Express Bus and various local bus lines.”

Page 2-5, the numbered bulleted points under the sub-heading “Project Goals and Objectives” are replaced with the following:

- Conserve viable neighborhoods, districts, historic/cultural resources and public right of way
- Provide a range of employment and housing opportunities
- Make streets walkable
- Improve open space, parks and public spaces
- Provide adequate public infrastructure
- Provide adequate public services
- Encourage sustainable land use in proximity to transit

- Expand mobility options
- Ensure that buildings and neighborhoods are well-designed.
- Promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
  1. ~~To provide additional housing, especially near supporting infrastructure and services, including public transit, for an anticipated population increase.~~
  2. ~~To provide appropriate transitional lower density between adjacent single-family residential and higher density multiple-family residential and/or higher intensity commercial/industrial uses.~~
  3. ~~To eliminate conflicts and/or inconsistencies between planned land use, zoning, and height limitations.~~
  4. ~~To maintain existing residential densities to preserve neighborhood character.~~
  5. ~~To minimize or eliminate non-conforming uses or lots.~~
  6. ~~To reflect existing or proposed land use.~~
  7. ~~To update planned land use designations and corresponding zones to reflect and be consistent with the categories in the General Plan Framework Element.~~
  8. ~~To promote mixed-use development.~~
  9. ~~To preserve historic architecture.~~
  10. ~~To correct the planned land use designation and/or zoning to Public Facilities and PF, respectively, from Public, Quasi-Public, Residential, Commercial, or Industrial categories to reflect public uses or ownership.~~

## PROJECT DESCRIPTION

Page 3-5, subsection 3.4, the following objective is added:

- Promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.

Page 3-9, the following is added as a new paragraph to the bottom of the page under the heading "REQUIRED APPROVALS:"

*Amendments to the Transportation Element to reflect modified Street Standards.*

*Amendments to the General Plan Framework Land Use Diagram will be required concurrently with the adoption of the updated Hollywood Community Plan.*

*Zone changes and height district changes.*

Page 4.1-27, Figure 4.1-6, under, Types of Proposed Changes, should read: Proposed Land Use Designation Change to **Neighborhood Commercial** (~~Medium Residential~~) and also Proposed Zone and/or Height District in Existing **Neighborhood Commercial** (~~Medium Residential~~).

Page 4.1-43 (and in the summary table), the following is added as a new mitigation measure:

4. The City shall ensure that review of individual discretionary projects shall address aesthetic concerns as appropriate to minimize site-specific aesthetic impacts, including impacts to views, scenic resources, lighting, and shading.

## POPULATION, EMPLOYMENT, AND HOUSING

Table 4.2-1: Hollywood Community Plan Area Population Changes is revised to include a new row with the 2010 population count of 198,228 persons, as follows:

1990 Census	213,912
2000 Census	210,824
2005 Estimate	224,426
<u>2010 Census</u>	<u>198,228</u>

*Source: City Planning Department, Demographics Unit and Community Plan Update Staff*

The following is added to the end of the paragraph immediately below Table 4.2-1:

The 2010 Census data indicates that there were 198,228 persons in the Hollywood CPA.

The following is added to the last paragraph on page 4.2-1:

According to the Census, the total number of housing units in 2010 was 103,187.

Page 4.2-6, Table 4.2-2: Population, Employment and Housing – Existing Conditions, Existing and Proposed Plans in 2030, and SCAG 2030 Forecast, is revised to include a new row showing the 2010 population and housing counts, as follows:

	Population	Employment (jobs)	Housing (DU)
Existing Conditions (2005)	224,426	100,980	100,600
Existing Plan Reasonable Expected Development 2030	235,850	105,782	108,722
SCAG 2030 Forecast	244,602	119,013	113,729
Proposed Plan Reasonable Expected Development (2030)	249,062	130,203	114,868
<u>2010 Census</u>	<u>198,228</u>	<u>n/a</u>	<u>103,187</u>

Na – not available at time of preparation of Final EIR

*Source: City of Los Angeles Planning Department, May 20, 2010; updated August 2011*

Page 4.2-9, Table 4.2-5: Housing Units – Existing, Existing and Proposed Plans in 2030 and SCAG 2030 Forecast is revised to include a row showing the 2010 total housing count, as follows:

	<b>Single-family units</b>	<b>Multi-family units</b>	<b>Totals units</b>
Existing (2005) Conditions	20,400	80,200	100,600
Existing Plan Reasonable Expected Development 2030	20,968	87,754	108,722
SCAG 2030 Forecast	21,421	92,308	113,729
Proposed Plan Reasonable Expected Development 2030	20,958	93,910	114,868
<u>2010 Census</u>	20,927*	82,260*	103,187

\* Assumes same % split as 2005 since only total number of units is available as of the time of preparation of Final EIR

*Source: City of Los Angeles Planning Department Community Planning Bureau, May 20, 2010; updated August 2011*

## **PUBLIC SERVICES**

Page 4.3-9, is revised to insert a new sentence at the end of the first paragraph:

According to the 2010 Census, the population count in the Hollywood CPA was 198,228. Using the same four police officers per 1,000 residents ratio, a population of 198,228 would require a deployment of 793 police officers.

Page 4.3-11, is revised to insert a new sentence at the end of the second paragraph under the subheading Increased Need for Police Protection:

The approximately 996 police officers required to accommodate the projected 2030 population of 249,062 persons would mean an additional 203 police officers over the 2010 requirement of 793 police officers. However, police protection has been changing over recent years and the same or improved protection can be provided with fewer officers. Therefore, the number of police officers required to provide adequate protection to the Hollywood Community will be determined by the Police Department based on their experience, staffing and equipment.

Page 4.3-12, the following clarifying language is added to the paragraph under UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS:

Project-specific impacts to police services will be determined on a case-by-case basis with input from the Police Department as appropriate. It is not intended that individual projects fund police staffing. However, at some point in the future the City could decide to levy a fee if the general fund proved insufficient to provide for adequate police protection. Any such fee would be subject to careful review and scrutiny prior to adoption.

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Page 4.3-15, is revised to insert a new sentence at the end of the third paragraph:

If the 2010 Census population count of 198,228 persons is used for the purposes of analysis, then, there are 0.30 square feet of library space and 1.42 books per person.

Page 4.3-15, is revised to insert a new sentence at the end of the fourth paragraph:

At 0.5 square feet per resident, the CPA's 2010 Census population count of 198,228 persons would require a total of approximately 94,614 square feet of library space, or 34,311 square feet more than the existing library space.

Page 4.3-15, is revised to insert a new sentence at the end of the fifth paragraph:

For the 2010 Census population count of 198,228 persons, at the rate of two volumes per resident, 396,456 volumes will be required, 115,066 more volumes than currently in the collection.

Page 4.3-18, is revised to insert a new sentence at the end of the last paragraph:

The 2010 Census population of 198,228 persons would result in a ratio of approximately 22.4 acres of total parkland per 1,000 residents.

On page 4.3-20, CF5.53 "open Space" is changed to "Open Space."

Page 4.3-20, the following is added before the heading "IMPACT ASSESSMENT:"

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized pursuant to the Quimby Act. Under the Quimby Act, requirements for parkland dedications are not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. As indicated above, the current ratio of Citywide parkland which includes regional park space is 9.23 acres per 1,000 persons.

Section 12.21G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50% of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25% of the common open space area must be planted

with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25% of the total required usable open space. Private open space is defined as area which is contiguous to and immediately accessible from an individual dwelling unit and which contains a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted towards the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

In addition, Section 17.12 of the LAMC, authorized under the Quimby Act requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located. If the developer does not meet the full parkland dedication requirement, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of all the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually. Section 17.12 of the LAMC allows recreation areas developed on a project site for use by the particular project's residents to be credited against the project's land dedication requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks.

Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities. In addition, Section 17.12 provides that outdoor landscaped area may be credited against the project's land dedication requirement if approved by the Advisory Agency.

Consistent with Section 17.12, Section 12.33 of the LAMC prohibits the rezoning of a property to permit a multiple residential use in any multiple residential or commercial zone unless a dedication of parkland has been made or assured or a payment in lieu thereof has been made or guaranteed. The parkland dedicated and/or the in-lieu payment are subject to the restrictions, conditions, exemptions and credits of Section 17.12. The parkland dedication or payment must be made in accordance with the provisions of Section 17.12, and is based upon the maximum number of dwelling units permitted by the requested zone or upon the number of dwelling units which may be constructed.

Page 4.3-22 (and the summary table), the following is added as a new mitigation measure:

- 5 The City shall ensure that individual projects within the Hollywood Planning Area comply with the Los Angeles Municipal Code with respect to provision of open space and recreational facilities. Compliance with this measure shall be sufficient to mitigate project-specific and cumulative impacts to Parks and Recreation.

Page 4.3-22. The following paragraph is added as a new second paragraph under the heading "EXISTING CONDITIONS:"

California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Senate Bill 50 (SB 50)



amended Government Code Section 65995 in 1998. Under the provisions of SB 50 schools can collect fees to offset costs associated with increasing school capacity as a result of development.

Page 4.3-36, the following clarifying language is added to the first partial paragraph on this page:

The first two mitigation measures below are intended to encourage City staff and decisionmakers to work with local schools, in particular LAUSD as well as Metro and other entities to ensure that school planning is taken into consideration in the development of public as well as private projects. It is not intended to imply that the City should design or build schools. The third mitigation measure (payment of applicable fees) would fully mitigate project-specific impacts.

Pages 4.3-31 to 4.3-32, Table 4.3-12 is revised to include 2010 Census data analysis. The following new paragraph is added after the first paragraph under Assessment on page 4.3-31:

The 2010 Census total number of housing units in the Hollywood CPA is 103,187 units. At present, the information regarding how many of this total housing count are single-family units and how many are multiple-family units is not available. The 2005 ratio of single-family units to multiple-family units was 20% single-family units to 80% multiple-family units. It seems reasonable to assume that this ratio would remain approximately the same in 2010, as well. If it is assumed that the ratio would remain the same as in 2005, then, the 2010 Census total of 103,187 housing units would mean that there were 20,637 single-family units (20%) and 82,550 multiple-family units (80%), in 2010.

Page 4.3-32, Table 4.3-12 is revised to add a new column indicating the estimated 2010 student population based on the 2010 census, as follows:

Grade Level	Existing Conditions (2005)		2010 Census*		Existing (1988) Community Plan (2030)		SCAG 2030 Forecast		Proposed Plan (2030)	
	Single Family	Multi Family	Single Family	Multi Family	Single Family	Multi Family	Single Family	Multi Family	Single Family	Multi Family
Elementary (K-5)	3,994	10,153	<u>4,041</u>	<u>10,451</u>	4,106	11,110	4,194	11,686	4,104	11,889
Middle (6-8)	1,903	5,550	<u>1,925</u>	<u>5,712</u>	1,956	6,073	1,999	6,388	1,955	6,499
High School (9-12)	2,167	5,285	<u>2,192</u>	<u>5,440</u>	2,227	5,783	2,275	6,083	2,226	6,189
Sub-Totals	8,064	20,988	<u>8,158</u>	<u>21,603</u>	8,289	22,966	8,468	24,157	8,285	24,577
<b>Totals</b>	29,052		<u>29,761</u>		31,255		32,625		32,862	
* It is assumed that that the 2010 Census total housing retained a 20/80 ratio for single-family housing to multi-family housing, the same as for 2005.										

Page 4.4-8, Table 4.4-4: Daily Water Consumption in the Hollywood Community Plan Area, is revised to include a new column showing 2010 water consumption based on the 2010 Census:

<b>Table 4.4-4: Daily Water Consumption in the Hollywood Community Plan Area (Gallons)</b>					
<b>Land Use</b>	<b>Existing (2005) Conditions</b>	<b>2010 Census</b>	<b>Existing Plan</b>	<b>SCAG Forecast (2030)</b>	<b>Proposed Plan</b>
Residential: Single-Family*	7,140,000	<u>7,222,950</u>	7,548,480	7,497,350	7,335,300
Residential: Multi-Family*	19,248,000	<u>19,812,000</u>	21,060,960	22,153,920	22,538,400
Commercial**	2,526,775	<u>2,526,775***</u>	2,502,028	2,993,879	3,143,926
Industrial**	815,160	<u>815,160***</u>	1,031,765	816,283	967,632
<b>TOTAL</b>	<b>29,729,935</b>	<b>30,376,885</b>	<b>32,143,233</b>	<b>33,461,432</b>	<b>33,985,258</b>
Consumption Rates: 350 gallons/unit/day for single-family residential*; 240gallons/unit/day for multi-family residential*; 94 gallons/1,000sf/day for commercial**; 94 gallons/1,000sf/day for industrial**. <u>(It is assumed that the 2010 Census total housing retained a 20/80 ratio for single-family housing to multi-family housing, the same as for 2005.)</u>					
* residential consumption rates are based on the LADWP estimates.					
** commercial and industrial water consumption rates are based on a sewage generation factor of 80 gpd/1000 gross square feet for commercial and industrial uses, obtained from the City of Los Angeles Draft L.A. CEQA Thresholds Guide (2006), multiplied by a factor of 1.18 for landscape irrigation usage.					
*** 2010 Census data for commercial and industrial square footage area are not available yet; this table assumes that the commercial and industrial area will remain the same as 2005 conditions and the only factor changing is the housing count.					
<i>Source: 2005 Urban Water Management Plan for Los Angeles Department of Water &amp; Power; City of Los Angeles Draft L.A. CEQA Thresholds Guide (2006) Sewage Generation Factors</i>					

Page 4.4-9, Mitigation Measure 1 is revised as follows:

1. As part of review of individual projects, the Planning Department shall work with LADWP to ensure appropriate expansion, upgrade and/or improvement of the local water supply and distribution system within the CPA as may be necessary to accommodate anticipated growth.

Page 4.4-9, the following new mitigation measure is added:

2. Individual projects that are consistent with the UWMP, undertake a Water Supply Analysis as required by State Law and/or comply with recommendations as appropriate identified on a site by site basis by the Department of Water and Power will be considered to not result in a cumulatively considerable contribution to this potential cumulatively significant impact unless project specific impacts are found to be significant.

Page 4.4-9 the paragraph under the heading “UNAVOIDABLE SIGNIFICANT IMPACTS,” is amended as follows:

As noted above, the City of Los Angeles is faced with the challenge of providing a sufficient supply of safe, reliable, and affordable water to a growing population and business sector, while, at the same time, dealing with the realities of the availability of water resources. Implementation of the Proposed Plan policies and the proposed mitigation measure listed above would reduce the impacts of the Proposed Plan. ~~However, given the uncertainties in the water supply horizon and in capacities of local delivery systems, impacts to water are considered potentially significant.~~

Page 4.4-17, Table 4.4-8: Annual Electricity Consumption in the Hollywood Community Plan Area is revised to include a new column showing annual electricity consumptions for 2010 Census housing, and to add asterisked explanations as follows:

Land Use	Existing Conditions (2005)	2010 Census	Existing (1988) Plan (2030)	SCAG 2030 Forecast 2030	Proposed Plan (2030)
Residential	520,303,200	533,683,164	562,310,184	588,206,388	594,097,296
Commercial*	435,465,477	435,465,477**	431,200,616	515,966,452	541,825,573
Industrial	45,961,118	45,961,118**	58,173,977	46,024,447	54,557,977
<b>TOTAL</b>	<b>1,001,729,795</b>	<b>1,015,109,759</b>	<b>1,051,684,777</b>	<b>1,150,197,287</b>	<b>1,190,480,846</b>

Consumption Rates: 5,172kwh/unit/yr for residential; 17.1kwh/sf/yr for office; 15.3kwh/sf/yr for retail; & 5.3kwh/sf/yr for industrial.  
\* commercial generation rates based on an average of office and retail with an average generation rate of 16.2kwh/sf/yr  
\*\* Assume to be the same numbers as 2005, since 2010 Census data are unavailable at this time.  
Source: AQMD Handbook for Preparing EIRs, rev. April 1993, South Coast Air Quality Management District

Page 4.4-24, the second threshold of significance is deleted.

- ~~2. An increase in the rate of wastewater generation in the CPA over existing (2005) rates of generation, or:~~

Page 4.4-27 (and in the Summary Table), the following is added as a new mitigation measure:

7. As part of the review of individual projects, drainage and hydrology issues shall be evaluated to ensure that impacts to drainage, groundwater and water quality are mitigated as necessary to comply with State law and City Code, including the City's Low Impact development Ordinance.

Page 4.4-34, the following is added as a new 4<sup>th</sup> paragraph before Table 4.4-16 (the associated footnote is added at the bottom of the page):

Sunshine Canyon Landfill, which receives 860,000 tons/year of solid waste from the Bureau of Sanitation has a maximum permitted capacity of 12,100 tons/day (or 4,416,500 tons/year). It has a maximum permitted capacity of 140,900,000 cubic yards. It had a remaining capacity of 112,300,000 cubic yards, as of July 31, 2007, which is the most recent date when remaining capacity was estimated. It is anticipated to reach capacity and cease operation at the end of 2037.\* Without consideration for the numerous other disposal locations, waste generated by the Hollywood Community Planning Area could be accommodated by this landfill through this date.

\* California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Detail page, available at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail/>; accessed on August 26, 2011

## TRANSPORTATION

Page 4.5-3, the descriptions of Hollywood and Cahuenga Boulevards are revised as follows:

**Hollywood Boulevard** - is classified a Major Class II Highway throughout the study area. In most parts of Hollywood, it has two lanes in each direction with on-street

parking on both sides of the street, with length of time restrictions in many blocks. West of La Brea Avenue, Hollywood Boulevard has two lanes in each direction during peak periods when on-street parking is prohibited. In off-peak hours, it is one lane in each direction with on-street parking on both sides of the street. The posted speed limit along Hollywood Boulevard is 35 MPH.

**Cahuenga Boulevard West (Barham to Odin and Franklin to Odin)**- is a Major Class II Highway. South of Odin Street, it has with two lanes in each direction as well as time restricted and metered parking lanes on both sides of the street. It also has center turn lanes at intersections. North of Odin, Cahuenga transitions to three lanes northbound and one lane southbound to the Pilgrim Bridge and northbound US-101 on-ramp. North from the Pilgrim Bridge to Barham Boulevard, Cahuenga operates as two parallel streets on opposite sides of the US-101 freeway. Cahuenga East is a one-way northbound frontage road. Cahuenga West is a two-way street connecting Highland Avenue to Ventura Boulevard with one lane northbound and two lanes southbound. The speed limits on both Cahuenga Boulevards East and West are 40 mph.

Page 4.5-4 the description of Fairfax Avenue is revised as follows:

**Fairfax Avenue** -is a Major Class II Highway from Hollywood Boulevard to ~~Fountain Street~~ Melrose Avenue. It has two lanes in each direction with on-street parking on both sides of the street, with length of time restrictions in many blocks. ~~Peak period parking restrictions result in a third travel lane in each direction during peak periods~~ The posted speed limit along Fairfax is 35 MPH. ~~South of Fountain Street, Fairfax Avenue is a Secondary Highway. North of Hollywood Boulevard it is a Secondary Highway.~~

Page 4.5-5 the description of Barham Boulevard and Franklin and Fountain Avenues are revised as follows:

**Barham Boulevard**- is classified a Secondary Highway that defines a boundary for the northern portion of the study area. It forks into West Olive Avenue and Forest Lawn Drive. It has two lanes in each direction with on-street parking ~~on both sides of the~~ only portions of the south side of the street, with length of time restrictions in many blocks.. The posted speed limit along Barham Boulevard is 35 MPH.

**Franklin Avenue**- is a Secondary Highway in the Plan Area from Gardner Street to St. George Street to the east. It has segments with two lanes in each direction with on-street parking on both sides of the street as well as segments with one-lane in each directions and parking, as well as a segment between La Brea and Highland with two lanes per direction and no on-street parking, as well as a segment between La Brea and Highland with two lanes per direction and no on-street parking. There are left turn pockets at some, but not all intersections.

**Fountain Avenue** - is a Secondary Highway in the Plan Area with two lanes in each direction during peak periods only, as well as time restricted ~~and metered~~ parking lanes on both sides of the street from Fairfax Avenue to La Brea Avenue. There is a gap in which Fountain becomes a Collector from La Brea Avenue to Wilcox Avenue where it has only one lane in each direction. Fountain Avenue then continues as a Secondary Highway from Wilcox Avenue to Hyperion Avenue. There are left turn pockets at most

intersections between Western Avenue and Cahuenga Boulevard. There is also a center lane turn lane from Van Ness Street to Wilton Avenue.

Page 4.5-9, the following is added to the end of paragraph 4:

Based on comments received on the Draft EIR, an analysis of 2010 conditions is now included in the EIR. For purposes of the 2010 analysis, the 2010 population estimate for Hollywood was changed in the model to reflect the 2010 U.S. Census. The difference in population within Hollywood between 2005 and 2010 results in an insignificant difference in traffic conditions due largely to the fact that much of the traffic on Hollywood streets is generated outside of Hollywood and is passing through the community plan area.

Page 4.5-11, paragraph 5 is revised as follows:

The calculated volume-to-capacity ratio for each direction is presented under the column “V/C”. The associated Level of Service for each V/C range is presented in the final columns under “LOS.” **Table 4.5-2** provides the 2005 and 2010 roadway Hollywood Arterial Summary including the vehicle miles traveled (VMT), vehicle hours of travel (VHT), and average speed on the streets within the Hollywood Community Plan area.

Page 4.5-11, paragraph 7 is revised as follows:

A total of 41% of Hollywood roadways (285 Links) operate at an LOS E or F in the 2005 base year and 42% are at E or F in 2010. **Figure 4.5-2a** identifies the location of all links that are operating at LOS E or worse in the existing condition during the PM peak hour in 2005. **Figure 4.5b** provides similar information for 2010. The volume-weighted V/C ratio is 0.939 for the 2005 base year and 0.937 for 2010. This indicates that on the whole, the streets in the Hollywood are an average of 93.9 or 93.7 percent of capacity in the PM peak hour. **Table 4.5-2** presents data for the AM peak period, Mid-day (MD), PM peak period, night-time (NT), and total 24-hour period. VMT and VHT are typically highest in the PM peak period when retail, entertainment, and tourist trips overlap with commute trips. Table A-1 in the Appendix to the TIMP shows the existing Level of Service for each arterial segment in the Hollywood CPA.

Page 4.5-12, Table 4.5-2 is revised as follows:

Year	VMT		VHT		Avg Speed (mph)	
	2005	2010	2005	2010	2005	2010
<b>AM</b>	429,148	430,156	23,013	21,615	19	20
<b>MD</b>	571,769	569,249	21,614	21,847	26	26
<b>PM</b>	668,102	663,281	36,832	34,647	18	19
<b>NT</b>	252,038	248,859	8,238	8,143	31	31
<b>Total</b>	1,921,057	1,911,545	89,698	86,252	21	22

~~2005~~-Existing conditions PM Weighted Average V/C: 0.939 (2005), 0.937 (2010)

~~2005~~-Existing Conditions % Links Operating at E-F: 41% (2005), 42% (2010)

Page 4.5-12, the following paragraph is added below Table 4.5-2:

The differences in summary statistics for 2010 compared to 2005 are small and not significant in terms of the characterization of existing conditions on Hollywood streets. With a weighted V/C ratio of 0.937 or 0.939, the network in Hollywood is reaching the saturation point, and 41-42% of the links are operating at levels of service E or F.

Page 4.5-13, Figure 4.5-2 becomes Figure 4.5-2a and Figure 4.5-2b with 2010 data is added and the Table of Contents is changed accordingly (see following).

Pages 4.5-16 to 4.5-17, Table 4.5-4 is revised as follows:

<b>Table 4.5-4: Designated Bikeways and Study Corridors</b>
<b>Class I Bike Path</b>
Los Angeles River Path
<b>Class II Bike Lanes</b>
Forest Lawn Drive (Barham Boulevard to -Zoo Drive)
Griffith Park Boulevard (Los Feliz Boulevard to Hyperion Avenue)
Los Feliz Boulevard (-Crystal Springs to Griffith Park Boulevard)
Mulholland Drive (Laurel Canyon Boulevard to -101 Freeway)
Sunset Boulevard (-Hillhurst Avenue to Santa Monica Boulevard)
<b>Class III Bike Routes</b>
Zoo Drive (Forest Lawn Drive to Crystal Springs Drive)
Crystal Springs Drive (Zoo Drive to Los Feliz Boulevard)
<b>Proposed Class II Bike Lane or Class II Bike Route</b>
Fountain Avenue (-La Brea Avenue to Sunset Boulevard)
Fairfax Avenue (Willoughby Avenue to Melrose Avenue)
Fairfax Avenue (Hollywood Boulevard to Fountain Avenue)
<b>Study Corridors</b>
<ul style="list-style-type: none"> <li>• <u>Hollywood Boulevard between Fairfax Avenue and Hillhurst Avenue</u></li> <li>• <u>Sunset Boulevard between Fairfax Avenue and Hillhurst Avenue</u></li> <li>• <u>Fairfax Avenue between Melrose Avenue and Rosewood Avenue</u></li> <li>• <u>Highland Avenue between Barham Boulevard and Rosewood Avenue</u></li> <li>• <u>Bronson Avenue between Franklin Avenue and Santa Monica Boulevard</u></li> <li>• <u>Edgemont Street between <del>Franklin Avenue</del> Lily Crest Ave and Melrose Avenue</u></li> <li>• <u>Virgil Avenue between Los Feliz Avenue and Melrose Avenue</u></li> <li>• <u>US-101 Cap Park between Santa Monica Boulevard and Hollywood Boulevard</u></li> <li>• <del><u>Virgil Avenue between Los Feliz and Sunset Boulevard</u></del></li> <li>• <u>Hillhurst Avenue between Sunset Boulevard and Melrose Avenue</u></li> <li>• <u>Vermont Avenue between Rosewood Avenue and Los Feliz Boulevard</u></li> <li>• <u>Wilton Place between Franklin Avenue and Melrose Avenue</u></li> <li>• <u>Vine Street between Melrose Avenue and Franklin Avenue</u></li> <li>• <u>La Brea Avenue between Franklin Avenue and Rosewood Avenue</u></li> <li>• <u>June Street between Waring Avenue and Rosewood Avenue</u></li> <li>• <u>Gower Avenue between Melrose Avenue and Fountain Avenue</u></li> <li>• <u>Van Ness Avenue between Sunset Boulevard and Melrose Avenue</u></li> <li>• <u>Oxford Street between Melrose Avenue and Romaine Street</u></li> <li>• <u>Heliotrope Drive between Rosewood Avenue and Loz Feliz Boulevard</u></li> <li>• <u>Hoover Street between Santa Monica Boulevard and Melrose Avenue</u></li> <li>• <u>Santa Monica between Sunset Boulevard and La Brea Avenue</u></li> </ul>

**Table 4.5-4: Designated Bikeways and Study Corridors**

- Franklin Avenue between ~~La Brea Avenue~~ Highland Avenue and Vermont Avenue
- Los Feliz Boulevard between Western Avenue and Riverside Drive
- Cahuenga Boulevard between ~~Barham Boulevard~~ Mulholland Dr and ~~Highland Avenue~~-Yucca St
- ~~Barham Boulevard between Forest Lawn Drive Cahuenga Boulevard and Forest Lawn Drive~~ Cahuenga Boulevard
- Waring Avenue between La Cienega and Gower Avenue
- Rosewood between La Cienega Boulevard and June Street
- Orange Drive between Rosewood Avenue and Franklin Avenue
- Las Palmas Avenue between Waring Avenue and Selma Avenue
- Rowena Avenue between Hyperion Avenue and Glendale Boulevard
- Finley Avenue between Edgemont Street and Talmadge Street
- Tracy Street between Talmadge Street and Hyperion Avenue
- Rowena Avenue between Hyperion Avenue and St. George Street
- St. George Street between Rowena Avenue and Franklin Avenue
- Franklin Avenue between St. George Street and ~~Vermont Avenue~~-Edgemont St
- Finley Avenue between Talmadge Street and Edgemont Street

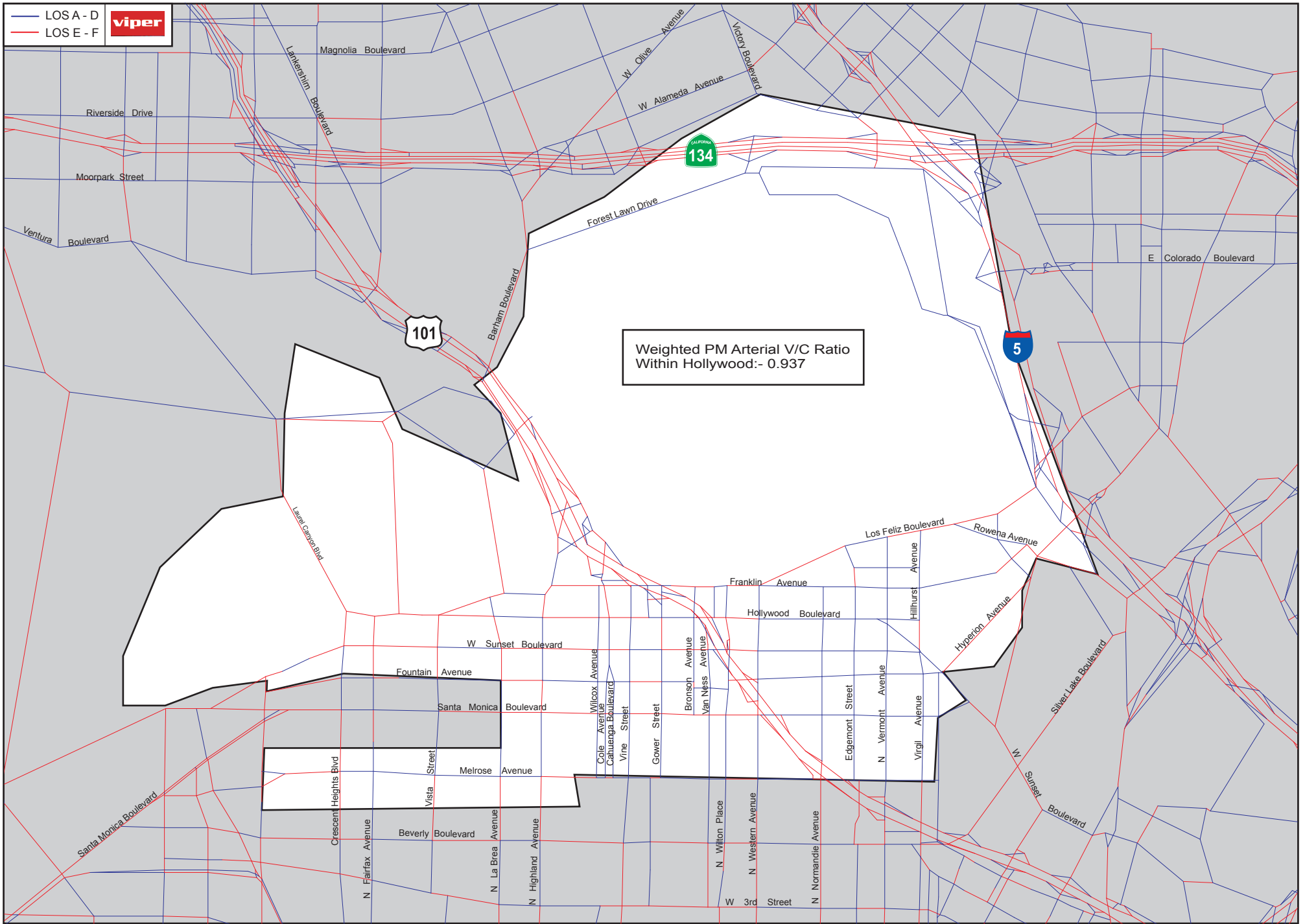
Page 4.5-17, the following is added to the end of the paragraph under Table 4.5-3.

The Community Plan Update does not amend the Bicycle Plan. Adoption or amendment of the Bicycle Plan requires a separate action of the City Council. The Community Plan is consistent with the Bicycle Plan. The Draft Hollywood Community Plan was prepared and circulated to the public in advance of adoption of the Bicycle Plan. The Bicycle Plan provides analysis of routes that are proposed, but many routes (including within the Hollywood Community Plan Area) have not been determined in detail and will require subsequent environmental review as they are planned in detail and impacts can be evaluated. The Department of Transportation and the Department of City Planning are coordinating a Five Year Implementation Plan for the Bicycle Plan, which will be updated annually with projects proposed for the coming year; each annual update is anticipated to require an EIR in order to address bicycle facilities in detail that are proposed within the next year and were not addressed in sufficient detail in the environmental document prepared for the Bicycle Plan. The physical improvements associated with the Bicycle Plan in Hollywood have not been finalized and therefore cannot be addressed in detail in this EIR.

Page 4.5-18, Figure 4.5-3 is replaced with the following updated Bicycle Facilities Map.

Page 4.5-22, Paragraph 3 is revised as follows:

To better capture cumulative growth, the impacts of two major proposed projects which lie outside, but near the border of the Hollywood Community Plan area were included in this analysis. These two projects are the Metro/Universal project and the ~~NBC/Universal Vision~~ Evolution Plan. The Metro/Universal joint development project includes construction of residential, retail and office towers over and around the Universal City Metro Red Line subway portal. The ~~NBC-Metro/Universal Vision Plan~~ project is a 1.5 million square foot development project that is anticipated to be completed by 2015. The total anticipated number of jobs created by these two projects is 9,580. The TIMP analysis incorporated these future jobs because of the large anticipated impact on traffic in Hollywood even though the projects technically are not located within the boundaries of the Community Plan area.



Weighted PM Arterial V/C Ratio  
Within Hollywood:- 0.937



**Legend:**

**Non-motorized Transit**

- Existing Class I Bike Path
- Existing Class II Bike Lane
- - - Existing Class III Bike Route
- Proposed Class II/III Bike Lane
- - - - Study Corridor
- Ⓜ Metro Rail Portal

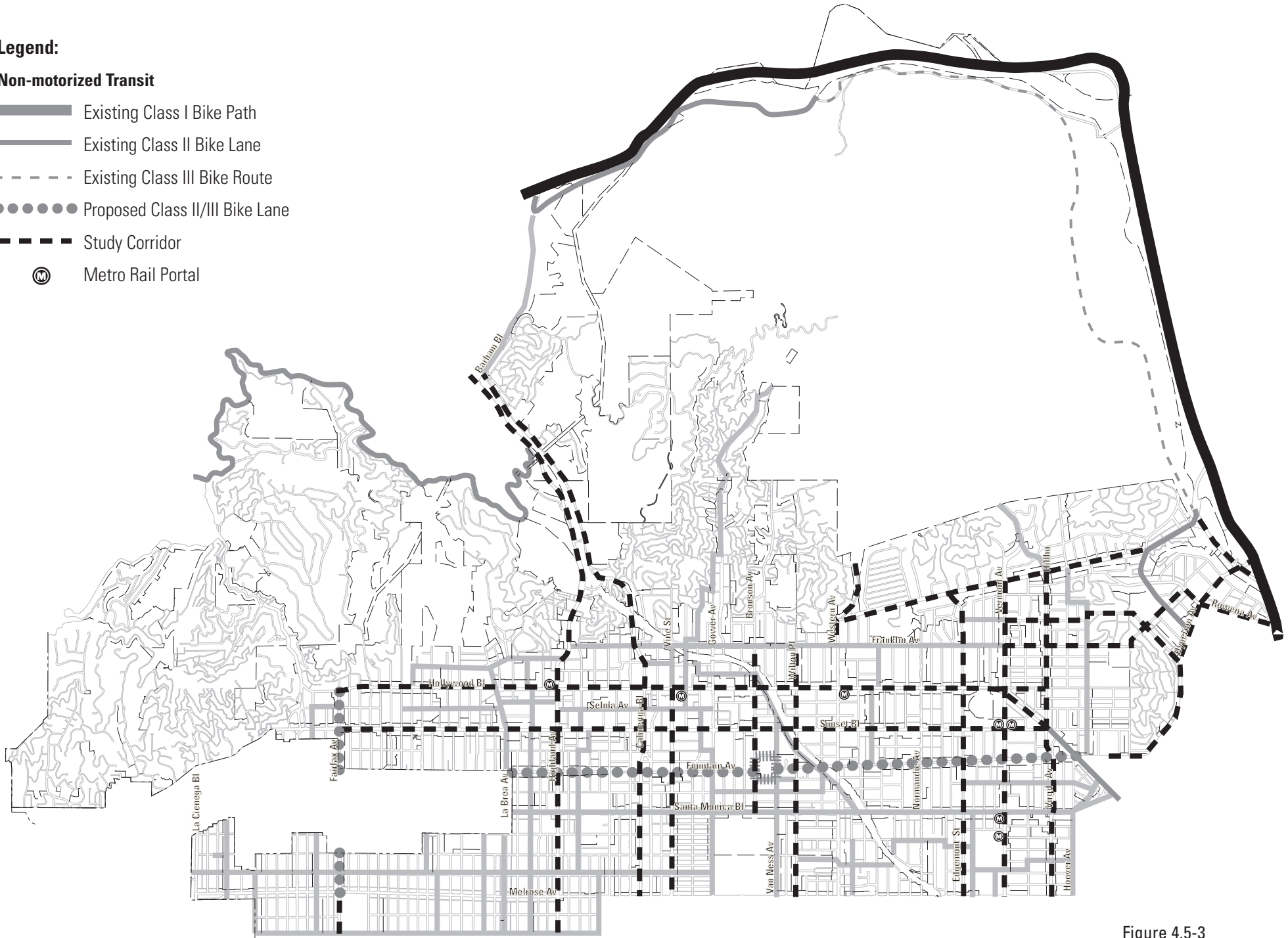


Figure 4.5-3

**Historic Resources within the Hollywood Community Plan Area**

083.09.13.11

This is an informational map provided for reference purposes only. It is not adopted as a part of the Hollywood Community Plan.

Page 4.5-23, Table 4.5-9 becomes Table 4.5-9a and the following new Table 4.5-9b is added along with an introductory sentence (and the Table of Contents is revised accordingly):

**Table 4.5-9b** presents a comparison of arterial summary data for the 2010 Condition to the Existing (1988) Plan scenario in 2030.

	<u>Change in VMT</u>	<u>% Change</u>	<u>Change in VHT</u>	<u>% Change</u>
<b>AM</b>	52,478	12.2%	4,384	20.3%
<b>MD</b>	127,286	22.4%	5,424	24.8%
<b>PM</b>	116,760	17.6%	8,409	24.3%
<b>NT</b>	47,782	19.2%	1,382	17.0%
<b>Total</b>	344,306	18.0%	19,599	22.7%

Page 4.5-29 is revised as follows:

**Table 4.5-12** provides a comparison of the summary statistics for the Proposed Plan in relation to the 2030 Existing Plan and 2005 and 2010 Conditions.

<b>PM Peak Hour Data</b>	<b>Existing (2005)</b>	<b>2010</b>	<b>2030 Existing (1988) Plan</b>	<b>2030 Proposed Plan (with TIMP)</b>
<b>Hollywood Population</b>	224,426	198,228	235,850	249,062
<b>Hollywood Employment</b>	100,980	100,980	105,782	130,203
<b>Hollywood Vehicle Trips</b>	80,744	78,222	125,194	125,036
<b>VMT</b>	1,921,057	1,911,545	2,255,851	2,264,531
<b>VHT</b>	89,698	86,252	105,851	106,732
<b>Weighted V/C</b>	0.939	0.937	0.993	1.000
<b>% E/F Links</b>	41%	42%	58%	58%

Page 4.5-29, paragraph 3 is revised as follows:

**Table 4.5-12** illustrates that the proposed Hollywood Community Plan would reduce future trip generation in the plan area by 0.13% as compared to the Existing Plan (No Project Condition), however, both the Existing Plan and the Proposed Plan would result in an increase in trips of nearly 55% as compared to Existing (2005) conditions and 60% compared to 2010 conditions. The difference in total Hollywood generated vehicle trips between the Proposed Plan and Existing Plan would be negligible.

Page 4.5-29, paragraph 6 is revised as follows:

The total vehicle miles of travel on Hollywood streets would be increased under the Proposed Plan as compared to the Base Year 2005 Conditions and the 2030 Existing Plan. This increase is partially due to additional longer-distance through-trips traveling through Hollywood. The weighted V/C ratio for roadway segments in Hollywood with the Proposed Plan and TIMP would be increased from 0.993 to 1.000 compared to the Existing Plan and as compared to 0.939 in 2005. There would be a small increase in vehicle hours of travel indicating increased congestion, but the same percentage of

roadway segments would be operating at LOS E or F under the Existing Plan and under the Proposed Plan (58%), both of which would be a substantial increase over 2005 conditions (41%) and 2010 conditions (42%).

## AIR QUALITY

Page 4.6-15 the footnotes at the bottom of the page are deleted:

~~<sup>1</sup>Significance Criteria are proposed in Governor's Office of Planning and Research, *Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions* released January 2009 which have not officially been adopted.~~

~~<sup>2</sup>*Ibid.*~~

Pages 4.6-19, first paragraph and 4.6-20, last (partial) paragraph, the population that would be accommodated by the Proposed Plan is 249,602 not 254,116, which is 25,176 more people than the 2005 population estimate (not 29,960).

Page 4.6-26 the following conditions are added to Air Quality Mitigation Measure 1:

- vii) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- viii) Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- ix) Reroute construction trucks away from congested streets or sensitive receptor areas.
- x) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- xi) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
- xii) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.
- xiii) Construct or build with materials that do not require painting.
- xiv) Require the use of pre-painted construction materials.
- xv) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
- xvi) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
  - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a

- 
- Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>.
- xvii) Other measures as applicable on a project by project basis and as may be recommended by SCAQMD on their web site or elsewhere: [www.aqmd.gov/cega/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/cega/handbook/mitigation/MM_intro.html).

Page 4.6-26 (and in the summary table), the following mitigation measures are added to clarify the requirement: for review of risks adjacent to freeways:

4. Require health risk assessments to be conducted for discretionary residential projects located within 500 feet of the 101 Freeway. Mitigation measures shall be required as necessary to reduce health risk (for indoor and outdoor uses) to an acceptable level. These health risk assessments shall be circulated to SCAQMD for review and comment.
5. In order to comply with the California Air Resources Board Air Quality and Land Use Handbook (June 2005) and achieve an acceptable interior air quality level for sensitive receptors, appropriate measures, shall be incorporated into project building design. The appropriate measures shall include one of the following methods:
  - a. The project applicant shall retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with the California Air Resources Board and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents/occupants/users to stationary air quality pollutants prior to issuance of a demolition, grading, or building permit. The HRA shall be submitted to the Lead Agency for review and approval. The applicant or implementation agency shall implement the approved HRA recommendations, if any. If the HRA concludes that the air quality risks from nearby sources are at or below acceptable levels, then additional measures are not required.
  - b. The applicant shall implement the following features that have been found to reduce the air quality risk to sensitive receptors and shall be included in the project construction plans. These shall be submitted to the Planning and Zoning Division and the Building Services Division for review and approval prior to the issuance of a demolition, grading, or building permit and ongoing.
  - c. Do not locate sensitive receptors near distribution center's entry and exit points.
  - d. Do not locate sensitive receptors in the same building as a perchloroethylene dry cleaning facility.

- 
- e. Maintain a 50' buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).
  - f. Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each individual residential unit, that meets the efficiency standard of the MERV 13. The HV system shall include the following features: Installation of a high efficiency filter and/or carbon filter-to-filter particulates and other chemical matter from entering the building. Either HEPA filters or ASHRAE 85% supply filters shall be used.
  - g. Retain a qualified HV consultant or HERS rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources.
  - h. Maintain positive pressure within the building.
  - i. Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
  - j. Achieve a performance standard of at least 4 air exchanges per hour of recirculation
  - k. Achieve a performance standard of .25 air exchanges per hour of in unfiltered infiltration if the building is not positively pressurized.
  - l. Project applicant shall maintain, repair and/or replace HV system or prepare an Operation and
  - m. Maintenance Manual for the HV system and the filter. The manual shall include the operating instructions and maintenance and replacement schedule. This manual shall be included in the CC&R's for residential projects and distributed to the building maintenance staff. In addition, the applicant shall prepare a separate Homeowners Manual. The manual shall contain the operating instructions and maintenance and replacement schedule for the HV system and the filters. It shall also include a disclosure to the buyers of the air quality analysis findings.

## NOISE

Page 4.7-10, the following is added as a new second sentence to the last paragraph:

The Burbank-Glendale-Pasadena Airport does result in over-flights of the project area causing audible aircraft noise to the south of the airport especially along Laurel Canyon and Mulholland. These over-flights are existing sources of noise that would not change with implementation of the Plan. Similarly LAPD and other helicopters provide a source of noise in this and other Los Angeles communities. But again they would not differ with Plan implementation. Aircraft and helicopter noise may be more substantial on certain parcels within the CPA and if so this issue would need to be addressed on a project-by-project basis depending on the use proposed.

Page 4.7-15 (and in the summary), the following mitigation measures are added to the EIR:

7. Commercial rooftop discretionary uses within 500 feet of residentially zoned areas shall be subject to noise analyses; mitigation shall be required to ensure that noise levels in residential areas will not result in a significant impact.
8. For all newly proposed entertainment venues requiring discretionary approval, noise abatement plans shall be required as conditions of approval.

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## CULTURAL RESOURCES

Page 4.9-1, the first two paragraphs and Table 4.9-1 under the subheading “*Historical/Architectural*” are replaced with the following (Table 4.9-1 is also replaced with the following):

Designated historic resources within the Hollywood Community Plan Area are illustrated in the maps included in **Figure 4.9a-h**, and listed in **Table 4.9-1**, and include properties listed in the National Register of Historic Places (NRHP) California Register of Historical Resources (CRHR) and designated City Historic Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs). Data for properties listed in the NRHP and CRHR are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes.

Inventories of designated historic resources are continually updated by the inclusion of new resources. **Figures 4.9-5a-h** and **Table 4.9-1** are subject to change over time and should not be considered the single definitive list of historic resources in the Hollywood Community Plan Area. For up-to-date information on historic resources within the Plan area contact the Office of Historic Resources, Department of City Planning at <http://preservation.lacity.org/> or (213) 978-1200.

Page 4.9-7, the paragraph above the subheading “Existing HPOZs,” is revised as follows; the following eight associated pages of Figure 4.9-5 a-h are also added:

The Hollywood Community Plan Area contains ~~four~~ five Historic Preservation Overlay Zones (HPOZs): Hancock Park HPOZ, Melrose Hill HPOZ, Spaulding Square HPOZ, Whitely Heights HPOZ and Hollywood Grove HPOZ. In addition there ~~are two~~ is one proposed HPOZs, ~~Hollywood Grove HPOZ~~ Sunset Square HPOZ and a HPOZ Study Area surrounding the Melrose Hill HPOZ. The location of the HPOZs are shown on **Figure 4.9-4**. **Figure 4.9-5 a through h** show the location of designated historic resources in the Hollywood Area as well as boundaries for Proposed Plan Subareas. **Table 4.9-1** lists these resources.

Page 4.9-8, the subheading “~~In Process HPOZ~~” is deleted.

Page 4.9-8, the last sentence of the paragraph addressing the Hollywood Grove HPOZ is deleted:

~~As of 2011, the Department of City Planning is currently processing the approval of the proposed Hollywood Grove HPOZ.~~

Page 4.9-20 the following is added under the subheading *Citywide Historic Resources Survey (SurveyLA)*:

Survey data from SurveyLA and the Citywide Historic Resources Survey are in draft format and undergoing formal review processes that includes public hearings. Information on SurveyLA findings can be obtained from Janet Hansen, Office of Historic Resources, Department of City Planning at [janet.hansen@lacity.org](mailto:janet.hansen@lacity.org) or (213) 978-1191.

**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

<i>Historic–Cultural Monuments</i>			
<b>Map Key#</b>	<b>Adopted</b>	<b>Name</b>	<b>Address</b>
356	2/5/1969	A & M Records Studio (Formerly Charlie Chaplin Studio)	1416 North La Brea Avenue
438	1/4/1963	Hollyhock House	4800 Hollywood Boulevard
521	5/24/1963	Two Stone Gates	Intersection of Beachwood Drive, Belden Drive, and Westshire Drive
366	2/26/1965	Barnsdall Art Park	4800 Hollywood Boulevard
368	2/26/1965	Barnsdall Park Arts Center (Residence A)	4800 Hollywood Boulevard
426	6/5/1968	Grauman’s Chinese Theater	6915-6927 Hollywood Boulevard
385	9/2/1970	Cedar Trees	Los Feliz Boulevard (between Riverside Drive and Western Avenue)
367	5/6/1971	Barnsdall Park	4800 Hollywood Boulevard
460	7/14/1971	John Sowden House	5121 Franklin Avenue
507	9/28/1971	Storer House	8161 Hollywood Boulevard
408	10/14/1971	Ennis House	2607 Glendower Avenue
472	10/14/1971	Lovell House	4616 Dundee Drive
502	10/14/1971	Samuel Freeman House	1962 Glencoe Way
485	1/26/1972	Palm Trees (Queen & Washingtonia Robusta) and the Median Strip	Highland Avenue (between Wilshire and Melrose)
449	2/7/1973	Hollywood Sign and Land Underneath	Mount Lee
420	3/7/1973	Gabrielino Indian Site	Fern Dell (Griffith Park)
418	4/17/1974	Franklin Avenue Bridge (Shakespeare Bridge)	Franklin Avenue
501	7/17/1974	Samuel - Novarro House	5601-5609 Valley Oak Drive
394	12/4/1974	Crossroads of the World	6671 Sunset Boulevard
500	12/4/1974	Saint Mary of the Angels	4510 Finley Avenue
387	3/24/1976	Chateau Marmont	8215-8221 Sunset Boulevard
415	10/6/1976	First Walt Disney Studio - site of	2660-2664 & 2701-2739 North Hyperion Avenue
535	10/6/1976	William Mulholland Memorial Fountain	Riverside Drive and Los Feliz Boulevard
413	10/20/1976	Fire Station No. 27	1355 North Cahuenga Boulevard and 1333 Cole Place
425	10/20/1976	Glendale-Hyperion Bridge	Los Angeles River
428	11/17/1976	Griffith Observatory	2500 East Observatory Road
540	5/4/1977	YWCA Hollywood Studio Club	1215-1233 Lodi Place
412	9/21/1977	Filming of First Talking Film - site of	5800-5858 Sunset Boulevard
454	1/18/1978	J. B. Lankershim Buriel Place - site of (North End)	Nichols Canyon Road
419	6/7/1978	Franklin Garden Apartments - site of (demolished July 1978)	6915-6933 Franklin Avenue
451	7/5/1978	Hollywood Walk of Fame	Hollywood Boulevard (between Gower and La Brea) & Vine Street (between Sunset and Yucca)
486	7/5/1978	Pantages Theater	6225-6249 Hollywood Boulevard
461	9/20/1978	KCET Studios	4391-4421 Sunset Boulevard
474	8/29/1979	Masquers Club Building (site of)	1765 North Sycamore Avenue
430	9/4/1979	Guaranty Building	6331 Hollywood Boulevard
456	4/3/1980	Janes House	6541 Hollywood Boulevard

Data for properties listed in the National Register of Historic Places and the California Register of Historical Resources (Status Codes 1 and 2) are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.

**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

508	10/9/1980	Sunset Plaza Apartments - site of (demolished 07/01/1987)	1216-1220 Sunset Plaza Drive
371	11/3/1980	Bollman House	1530-1534 North Ogden Drive
510	11/3/1980	Taft House - site of (demolished June 1982)	7771-7791 Sunset Boulevard
450	11/25/1980	Hollywood Studio Club	1215 Lodi Place
422	4/28/1981	Garden Court Apartment (demolished)	7021 Hollywood Boulevard
494	11/25/1981	Residence	1437 North Martel Avenue
495	11/25/1981	Residence	1443-1447 North Martel Avenue
414	12/4/1981	First United Methodist Church of Hollywood	6817 Franklin Avenue
397	5/17/1983	Edward's House	5642 Holly Oak Drive
504	8/18/1983	Security Trust and Savings	6381-6385 Hollywood Boulevard
378	9/15/1983	C.E. Toberman Estate	1847 Camino Palmero
441	6/12/1984	Hollywood Masonic Temple	6840 Hollywood Boulevard
436	4/23/1985	Highland-Camrose Bungalow Village	2103-2115 1/2 North Highland Avenue, 6814-6836 Alta Loma Terrace, and 6819 Camrose Avenue
478	7/18/1985	Montecito Apartments	6650 Franklin Avenue
406	9/24/1985	Engine Company No. 27	1355 North Cahuenga Boulevard
459	6/27/1986	John C. Fremont Branch Library	6121 Melrose Avenue
524	9/12/1986	Villa Bonita	1817 Hillcrest Road
381	10/24/1986	Cahuenga Branch Library	4591 West Santa Monica Boulevard
525	10/28/1986	Villa Carlotta	5959 Franklin Avenue and 1913-1915 Tamarind Avenue
362	10/29/1986	Arzner / Morgan Residence	2249 Mountain Oak Drive
536	1/7/1987	William Stromberg Clock	6439 Hollywood Boulevard
505	8/26/1987	Shulman House	7875-7877 Woodrow Wilson Drive
386	9/23/1987	Chateau Elysee	5925-5939 Yucca Street, 5930-5936 Franklin Avenue, and 1806-1830 Tamarind Avenue
452	1/6/1988	Hollywood Western Building	5500-5510 Hollywood Boulevard
364	1/22/1988	Avocado Trees	4400 block Avocado Street
462	1/22/1988	La Belle Tour	6200 Franklin Avenue
479	5/11/1988	Monterey Apartments	4600-4604 Los Feliz Boulevard
410	7/26/1988	Falcon Studios (demolished)	5524 Hollywood Boulevard
457	10/4/1988	Jardinette Apartments	5128 Marathon Street
404	11/3/1988	El Greco Apartment	817-823 North Hayworth Avenue
497	11/23/1988	Roman Gardens	2000 North Highland Avenue
411	11/30/1988	Feliz Adobe	4730 Crystal Springs Drive
532	12/13/1988	Whitley Court	1720-1728 1/2 Whitley Avenue
473	1/17/1989	Magic Castle	7001 Franklin Avenue
464	3/31/1989	Lake Hollywood Reservoir (including Mulholland Dam)	2460 Lake Hollywood Drive
359	5/16/1989	Andalusia Apartments	1471-1475 Havenhurst Drive
396	5/31/1989	Dunning House	5552 Carlton Way and 1606-1616 Saint Andrews Place
391	6/20/1989	Courtney Desmond Estate	1801-1811 Courtney Avenue
361	10/17/1989	Artisan's Patio Complex	6727-6733 Hollywood Boulevard
357	11/3/1989	Afton Arms Apartment	6141 Afton Place

Data for properties listed in the National Register of Historic Places and the California Register of Historical Resources (Status Codes 1 and 2) are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.



**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

439	11/3/1989	Hollywood American Legion Post #43	2035 North Highland Avenue
467	1/26/1990	Little Nugget (Travel Town - Griffith Park)	5200 Zoo Drive
402	6/12/1990	El Capitan Theater Building	6834-6838 Hollywood Boulevard
435	10/16/1990	Highland Towers Apartments	1920-1928 North Highland Avenue
511	3/15/1991	Taggart House	2150-2158 Live Oak Drive and 5423 Black Oak Drive
453	6/11/1991	Hollywoodland's Historic Granite Retaining Walls and Stairs	Hollywoodland
447	8/13/1991	Hollywood Roosevelt Hotel and Pool	7000-7034 Hollywood Boulevard and 7001-7039 Hawthorn Avenue
477	11/12/1991	Midtown School (site plus four John Lautner Buildings)	4155 Russell Avenue
424	3/23/1992	Gilmore Gasoline Service Station	853-859 North Highland Avenue and 6800 Willoughby Avenue
518	4/21/1992	Thirteenth Church of Christ Scientist	1748-1780 North Edgemont Street
468	7/14/1992	Lloyd Wright's Headley - Handley House	3003 Runyon Canyon Road
466	10/2/1992	Little Country Church of Hollywood	1750 North Argyle Avenue and 6151-6161 Carlos Avenue
529	2/9/1993	Warner Brothers Hollywood Theater Building	6423-6445 Hollywood Boulevard and 1700-1718 Wilcox Avenue
530	5/25/1993	Wattles Park (Mansion and Garden)	1824-1850 North Curson Avenue, 1701-1755 Sierra Bonita Avenue, and 7561 Hollywood Boulevard
398	9/21/1993	Egyptian Theater and Forecourt Storefronts	6706-6712 Hollywood Boulevard and 1650-1654 McCadden Place
490	3/3/1994	Philosophical Research Society	3341-3351 Griffith Park Boulevard and 3910-3918 Los Feliz Boulevard
475	4/26/1994	Max Factor Make-Up Salon	1666 North Highland Avenue
493	8/5/1994	Raymond Chandler Square	Intersection of Hollywood Boulevard and Cahuenga Avenue
527	9/27/1994	Villa Vallambrosa	2074 Watsonia Terrace
448	11/1/1994	Hollywood School for Girls (Womens Club of Hollywood)	1741-1751 North La Brea Avenue
517	6/23/1995	The Trianon and Neon Roof Sign	1750-1754 North Serrano Avenue
444	7/25/1995	Hollywood Pilgrimage Memorial Monument	2580 Cahuenga Boulevard
491	11/13/1996	Pierson Residence	3124 Belden Drive
538	12/9/1997	Withers Residence	2731 Woodshire Drive
499	3/19/1998	Saint Andrews Bungalow Court	1514-1544 North Saint Andrews Place
431	10/14/1998	Halifax Apartments	6376 Yucca Street
470	10/14/1998	Los Feliz Heights Steps	Cromwell Avenue, Bonvue Avenue, Glencairn Road, Bryn Mawr Road, and Glendower Avenue
484	12/18/1998	Pacific's Cinerama Dome Theater and Marquee	6360 Sunset Boulevard
372	9/29/1999	Broadway Department Store and Neon Sign	6300 West Hollywood Boulevard
437	9/29/1999	Hillside House by Carl Maston	8707 St. Ives Drive
445	9/29/1999	Hollywood Plaza Hotel and Neon Sign	1633 Vine Street
509	9/29/1999	Taft Building and Neon Sign	6280 West Hollywood Boulevard
506	11/9/1999	Stahl House - Case Study House #22	1635 Woods Drive
516	11/17/1999	The Outpost 11	1851 Outpost Drive
455	2/25/2000	Jacobson House	4520 Dundee Drive

Data for properties listed in the National Register of Historic Places and the California Register of Historical Resources (Status Codes 1 and 2) are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.

**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

526	2/25/2000	Villa Elaine	1241-1249 North Vine Street
498	6/14/2000	S.H. Woodruff Residence	3185 North Durand Drive
520	10/24/2000	Tornborg House	1918 North Tamarind Avenue
405	2/6/2001	Eliot House	4237 Newdale Drive
489	2/6/2001	Philip Chandler House	2531 North Catalina Street
434	7/31/2001	Hewitt Residence	1543 North Curson Avenue
395	4/24/2002	Don Carlos Apartments	5226 Hollywood Boulevard
465	5/15/2002	Lehman House	2720 Belden Drive
515	10/23/2002	The Garrick	539 North Sycamore Avenue
409	11/1/2002	Executive Office Building (Old Warner Brothers Studio)	5800 Sunset Boulevard
528	6/3/2003	Vista del Mar Steps	Between Vista del Mar and Holly Mont Drive
519	10/29/2003	Toberman House	1749 North Harvard Boulevard
400	12/16/2003	El Cabrillo Apartments	1832-1850 North Grace Avenue
392	3/24/2004	Covert Cottages Bungalow Court	938-944 1/2 North Martel Avenue
531	4/14/2004	Weaver Residence	4940 Melrose Avenue
401	4/27/2004	El Cadiz Apartments	1721 North Sycamore Avenue
389	8/10/2004	Chemosphere House	7776 Torreyson Drive
487	8/10/2004	Paul Lauritz House	3955 Clayton Avenue
388	5/18/2005	Chateau des Fleur	6626 Franklin Avenue
513	6/1/2005	The Courtyard Apartments	1570 Labaig Avenue
537	7/8/2005	Wirin House	2622 Glendower Avenue
463	7/13/2005	La Leyenda Apartments	1735-1737 North Whitley Avenue
480	7/13/2005	Nirvana Apartments	1775-1781 North Orange Drive
433	9/14/2005	Hellman House	1845 North Courtney Avenue
471	9/14/2005	Los Orchidas	1903 North Orchid Avenue
383	1/25/2006	Casa Laguna	1855-1883 North Kingsley Drive
427	1/25/2006	Grier House	2690 North Hollyridge Drive
358	3/17/2006	Amsalem A. Ernst House	5670 Holly Oak Drive
482	5/10/2006	Ojai Apartments	1929-1933 North Whitley Avenue
469	5/19/2006	Los Feliz Brown Derby	4500 Los Feliz Boulevard
365	8/16/2006	B.A.G. Fuller Residence	6887 West Alta Loma Terrace
539	9/27/2006	Wolff Residence	8530 West Hedges Place
382	11/15/2006	Capitol Tower and Rooftop Sign	1740-1750 North Vine Street; 6236 West Yucca Street
483	2/6/2007	Orchard Gables Cottage	1277 North Wilcox Avenue; 6516 West Fountain Avenue
369	3/29/2007	Barnsdall, Aline Complex	4800 Hollywood Boulevard
476	4/27/2007	Mayfair Apartments and Rooftop Neon Sign	1760 North Wilcox Avenue
421	6/5/2007	Garber House	6060 Scenic Avenue
446	6/5/2007	Hollywood Professional Building	7046 Hollywood Boulevard
514	7/25/2007	The Fontenoy	1811 North Whitley Avenue
432	12/5/2007	Harpel House #1	7764 West Torreyson Drive
496	1/30/2008	Riverside-Zoo Drive Bridge	Bridge #53C1298
373	2/26/2008	Bukowski Court	5124-5126 1/2 West De Longpre Avenue
370	4/8/2008	Blackburn Residence	4791 Cromwell Avenue

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488	4/8/2008	Petitfils Residence	4519 West Cockerham Drive and 2441 North Vermont Avenue
523	4/8/2008	Victor Rossetti Residence	2188 Ponet Drive
541	6/11/2008	Yamashiro	1900, 1920, 1930, 1940, 1964 & 1966 North Fitch Drive; 1821,1831,1901, 1921, 1941, 1961 & 1999 North Sycamore Avenue
481	1/14/2009	North Vermont Avenue Moreton Bay Fig Trees	Vermont Avenue between Los Feliz Boulevard and Aberdeen Avenue
429	1/27/2009	Griffith Park	4730 Crystal Springs Drive; 3201,3210 & 3401 Riverside Drive; 2715 Vermont Avenue and 5333 Zpp Drive
379	3/10/2009	CBS Columbia Square Studios	1526-1528 El Centro Avenue 6121-6125 West Sunset Boulevard
512	1/7/2011	The Bricker Building	1671 North Western Avenue
360	4/20/2011	Arensberg-Stendahl Home Gallery	7065 West Hillside Avenue
423	5/11/2011	Garden of Oz	3040-3106 North LedgeWood Drive
390	5/18/2011	Clifford E. Clinton Residence	5470 West Los Feliz Boulevard
492	9/14/2011	Ralph J. Chandler Residence	1926 North Hobart Boulevard

### Historic Preservation Overaly Zones

Map Key#	HPOZ Name	Adopted
542	Hancock Park	2007
543	Hollywood Grove	2011
544	Melrose Hill	1988
545	Spaulding Square	1993
546	Whitley Heights	1992

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

<b>National Register of Historic Places</b>			
<i>Districts</i>			
	<b>National Register District Name</b>		<b>Status Code</b>
	HOLLYWOOD BOULEVARD COMMERCIAL & ENTERTAINMENT DISTRICT		1D
	HIGHLAND-CAMROSE BUNGALOW VILLAGE		1S
	HOLLYWOOD MEMORIAL PARK CEMETERY		1S
	WHITLEY HEIGHTS HISTORIC DISTRICT		1S
<i>Individually Listed/District Contributor</i>			
<b>Map Key#</b>	<b>Resource Name</b>	<b>Address</b>	<b>Status Code</b>
1	ENNIS-BROWN HOUSE F L WRIGHT STONEH	2655 GLENDOWER AVE	1CL
2	SAMUEL FREEMAN HOUSE--FL WRIGHT BLO	1962 GLENCOE WAY	1CL
3	ABBEY OF THE PSALMS MAUSOLEUM	6000 SANTA MONICA BLVD	1D
4	AMY ARCHARD HOME	6650 WHITLEY TER	1D
5	ANITA LOUISE/JANET GAYNOR HOME	6666 WHITLEY TER	1D
6	ARTHUR MURRAY	7024 HOLLYWOOD BLVD	1D
7	ATTIE BUILDING	6436 HOLLYWOOD BLVD	1D
8	B H DYLAS COMPANY, BROADWAY DEPARTM	6300 HOLLYWOOD BLVD	1D
9	BANK OF AMERICA	6780 HOLLYWOOD BLVD	1D
10	BARBARA LAMARR/WESLEY LAU HOME	6672 WHITLEY TER	1D
11	BETH OLAM MAUSOLEUM	6000 SANTA MONICA BLVD	1D
12	BEULAH BONDI/ROSALIND RUSSELL HOME	6660 WHITLEY TER	1D
13	BEVERLY DANVELO HOME	6603 WHITLEY TER	1D
14	BUNGALOW	1528 N ST ANDREWS PL	1D
15	CARMEN MIRANDA HOME	6615 PADRE TER	1D
16	CHAPEL OF THE PSALMS	6000 SANTA MONICA BLVD	1D
17	CHEROKEE BUILDING	6630 HOLLYWOOD BLVD	1D
18	CHESTER MORRIS HOME	6662 WHITLEY TER	1D
19	CHRISTIE HOTEL, SCIENTOLOGY INSTITU	6724 HOLLYWOOD BLVD	1D
20	CLOCK TOWER	6000 SANTA MONICA BLVD	1D
21	CONSUMERS DISCOUNT DRUGS	6542 HOLLYWOOD BLVD	1D
22	DENNIS OKEEFE/PETER MILNE HOME	6734 WEDGEWOOD PL	1D
23	DONALD O'CONNOR HOME	6675 WHITLEY TER	1D
24	DOUGLAS FAIRBANKS MEMORIAL	6000 SANTA MONICA BLVD	1D
25	DOUGLAS FAIRBANKS SR. REFLECTING PO	6000 SANTA MONICA BLVD	1D
26	EL CAPITAN THEATER OFFICE BUILDING	6834 HOLLYWOOD BLVD	1D
27	ELIZA OTIS BELL TOWER	6000 SANTA MONICA BLVD	1D
28	ELIZA OTIS POETRY-INSCRIBED BRONZE	6000 SANTA MONICA BLVD	1D
29	EQUITABLE BLDG	6353 HOLLYWOOD BLVD	1D
30	FAY COMPTON/SPRING BYINGTON/TOTHERO	6738 WEDGEWOOD PL	1D
31	FRANCIS X BUSHMAN/TYRONE POWER HOME	2020 GRACE AVE	1D
32	FRANK SCULLY HOME	2071 GRACE AVE	1D
33	GERTRUDE ASTOR HOME	2030 HOLLY HILL TER	1D

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34	GILBERT'S BOOK STORE	6264 HOLLYWOOD BLVD	1D
35	GLORIA SWANSON/WILLIAM FAULKNER HOM	2058 WATSONIA TER	1D
36	GRAUMAN'S CHINESE THEATER	6925 HOLLYWOOD BLVD	1D
37	GRAUMAN'S EGYPTIAN THEATER	6708 HOLLYWOOD BLVD	1D
38	GRIFFITH OBELISK	6000 SANTA MONICA BLVD	1D
39	GUARANTY BLDG, ALLSTATE TITLE BLDG	6331 HOLLYWOOD BLVD	1D
40	H H BARTER HOUSE	6620 WHITLEY TER	1D
41	HENRY JONES HOME	6658 WHITLEY TER	1D
42	HIGHLAND-CAMROSE BUNGALOW #10	2109 N HIGHLAND AVE	1D
43	HIGHLAND-CAMROSE BUNGALOW #11	2111 N HIGHLAND AVE	1D
44	HIGHLAND-CAMROSE BUNGALOW #12	2113 N HIGHLAND AVE	1D
45	HIGHLAND-CAMROSE BUNGALOW #13	2115 N HIGHLAND AVE	1D
46	HIGHLAND-CAMROSE BUNGALOW #14	2115 N HIGHLAND AVE	1D
47	HIGHLAND-CAMROSE BUNGALOW #2	6819 CAMROSE DR	1D
48	HIGHLAND-CAMROSE BUNGALOW #3	2122 WOODLAND WAY	1D
49	HIGHLAND-CAMROSE BUNGALOW #4	2103 N HIGHLAND AVE	1D
50	HIGHLAND-CAMROSE BUNGALOW #5	2103 N HIGHLAND AVE	1D
51	HIGHLAND-CAMROSE BUNGALOW #6	2105 N HIGHLAND AVE	1D
52	HIGHLAND-CAMROSE BUNGALOW #7	2105 N HIGHLAND AVE	1D
53	HIGHLAND-CAMROSE BUNGALOW #8	2105 N HIGHLAND AVE	1D
54	HIGHLAND-CAMROSE BUNGALOW #9	2107 N HIGHLAND AVE	1D
55	HILLVIEW APARTMENTS	6531 HOLLYWOOD BLVD	1D
56	HILLVIEW CADILLAC, MOTORAME	7001 HOLLYWOOD BLVD	1D
57	HOLLY CINEMA	6523 HOLLYWOOD BLVD	1D
58	HOLLYHOCK HOUSE	4800 HOLLYWOOD BLVD	1D
59	HOLLYWOOD BROWN DERBY	1628 N VINE ST	1D
60	HOLLYWOOD CATHEDRAL MAUSOLEUM	6000 SANTA MONICA BLVD	1D
61	HOLLYWOOD CONGREGATIONAL CHURCH	7065 HOLLYWOOD BLVD	1D
62	HOLLYWOOD EQUITABLE BUILDING	6253 HOLLYWOOD BLVD	1D
63	HOLLYWOOD KNICKERBOCKER HOTEL	1714 N IVAR AVE	1D
64	HOLLYWOOD PANTAGES THEATER	6233 HOLLYWOOD BLVD	1D
65	HOLLYWOOD PLAYHOUSE, HOLLYWOOD VARI	1735 N VINE ST	1D
66	HOLLYWOOD PLAZA HOTEL	1633 N VINE ST	1D
67	HOLLYWOOD PROFESSIONAL BLDG	7046 HOLLYWOOD BLVD	1D
68	HOLLYWOOD ROOSEVELT HOTEL	7000 HOLLYWOOD BLVD	1D
69	HOLLYWOOD THEATRE	6766 HOLLYWOOD BLVD	1D
70	HOLLYWOOD TOYS	6554 HOLLYWOOD BLVD	1D
71	HOLLYWOOD WAX MUSEUM	6765 HOLLYWOOD BLVD	1D
72	IRENE TEDROW/LENORE COFFEE HOME	6740 MILNER ROAD	1D
73	JANE FONDA AND TOM HAYDEN RESIDENCE	2001 HOLLY HILL TER	1D
74	JANES HOUSE	6541 HOLLYWOOD BLVD	1D
75	JEAN PARKER HOME	6627 EMMET TER	1D

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

76	JJ NEWBERRYS	6600 HOLLYWOOD BLVD	1D
77	JOHN CHARLES THOMAS/LEONARD BERNSTE	2074 WATSONIA TER	1D
78	JOHN THOMAS/EDWIN MEYER HOME	2002 N LAS PALMAS AVE	1D
79	JOHNNY'S STEAKHOUSE	6553 HOLLYWOOD BLVD	1D
80	LAWN-PARK LANDSCAPE DESIGN	6000 SANTA MONICA BLVD	1D
81	LEED'S	6352 HOLLYWOOD BLVD	1D
82	LLOYD NOLAN/HELEN TRAUBEL/D KIRSTEN	6754 WEDGEWOOD PL	1D
83	LOS ANGELES FIRST FEDERAL, SECURITY	6777 HOLLYWOOD BLVD	1D
84	LOUISE FAZENDA FOUNTAIN	6000 SANTA MONICA BLVD	1D
85	MARIE DRESSLER HOME	6718 MILNER ROAD	1D
86	MARQUARDT / CARON HOME	6770 MILNER ROAD	1D
87	MARTIN BALSAM HOME, JOYCE VAN PATTE	2041 GRACE AVE	1D
88	MARY JACKSON HOME	2055 GRACE AVE	1D
89	MASONIC TEMPLE	6840 HOLLYWOOD BLVD	1D
90	MAURICE CHEVALIER HOME	6680 WHITLEY TER	1D
91	MAX FACTOR MAKEUP SALON	1666 N HIGHLAND AVE	1D
92	MILLERS STATIONERS	6740 HOLLYWOOD BLVD	1D
93	MONTMARTRE	6755 HOLLYWOOD BLVD	1D
94	MUSSO FRANK GRILL	6663 HOLLYWOOD BLVD	1D
95	OTIS OBELISK	6000 SANTA MONICA BLVD	1D
96	OUTPOST BUILDING	6701 HOLLYWOOD BLVD	1D
97	OWL DRUG CO, JULIAN MEDICAL	6380 HOLLYWOOD BLVD	1D
98	PALMER BLDG	6362 HOLLYWOOD BLVD	1D
99	PAUL KELLY / KETTI FRINGS HOME	2057 N LAS PALMAS AVE	1D
100	PHYLLIS HAVER HOME	6621 EMMET TER	1D
101	PICKWICK BOOKSTORE, B. DALTON PICKW	6743 HOLLYWOOD BLVD	1D
102	PIG N WHISTLE RESTAURANT, LONDON BR	6718 HOLLYWOOD BLVD	1D
103	REGAL SHOE STORE	6349 HOLLYWOOD BLVD	1D
104	REGENCY BLDG / GENERAL NUTRITION BL	6324 HOLLYWOOD BLVD	1D
105	REXALL DRUG STORE, LEE DRUG CO	6800 HOLLYWOOD BLVD	1D
106	RICHARD AND KAREN WOOKEY HOME	2062 WATSONIA TER	1D
107	RICHARD BARTHELMESS HOME, BILL BAST	6691 WHITLEY TER	1D
108	RICHARD EAGAN HOME	2133 FAIRFIELD AVE	1D
109	RISSNER PATTY/ROLAND WEST HOME	6665 EMMET TER	1D
110	ROBERT VIGNOLA/SIDNEY ALCOTT HOME	6697 WHITLEY TER	1D
111	S H KRESS & CO, FREDRICKS OF HOLLYW	6606 HOLLYWOOD BLVD	1D
112	SECURITY TRUST & SAVINGS BANK, SECU	6381 HOLLYWOOD BLVD	1D
113	SECURITY TRUST/STORES	7051 HOLLYWOOD BLVD	1D
114	SEVEN SEAS	6904 HOLLYWOOD BLVD	1D
115	SHANE BUILDING	6652 HOLLYWOOD BLVD	1D
116	ST ANDREWS BUNGALOW	1514 N ST ANDREWS PL	1D
117	TAFT BUILDING	1680 N VINE ST	1D
118	THE ADALUSIA FOUNTAIN	1471 HAVENHURST DR	1D

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119	THE ANDALUSIA BUILDING 2	1473 HAVENHURST DR	1D
120	THE ANDALUSIA BUILDING 3	1475 HAVENHURST DR	1D
121	THE BAINE BUILDING, MERCHANTS TITLE	6601 HOLLYWOOD BLVD	1D
122	THE COLUMBARIUM	6000 SANTA MONICA BLVD	1D
123	THE CREMATORY	6000 SANTA MONICA BLVD	1D
124	THE ITALIAN RENAISSANCE BUILDING CO	6000 SANTA MONICA BLVD	1D
125	THE J P CREQUE BUILDING, HOLLYWOOD	6400 HOLLYWOOD BLVD	1D
126	W C FIELDS/MAX STERNER HOME, GENE M	6746 WEDGEWOOD PL	1D
127	WARNER THEATRE BUILDING, PACIFIC HO	6423 HOLLYWOOD BLVD	1D
128	WESLEY AND JULIA BARRY HOME	6692 WHITLEY TER	1D
129	WHITLEY COURT / BUNGALOW DUPLEX #1	1720 WHITLEY AVE	1D
130	WHITLEY HOME	6630 WHITLEY TER	1D
131	WHITNEY BLAKE/LEE GARMES/ARNOLD ARM	6722 WHITLEY TER	1D
132	WILLIAM CLARK JR. MEMORIAL	6000 SANTA MONICA BLVD	1D
133	WILLIAM EYTHE/LON MCALLISTER HOME	6689 EMMET TER	1D
134	WILLIAM WELLMAN/JACK MULHALL HOME	6747 MILNER ROAD	1D
135	ZOELLNER HOME	6615 EMMET TER	1D
136		1914 N LAS PALMAS AVE	1D
137		1959 WHITLEY AVE	1D
138		1965 WHITLEY AVE	1D
139		1969 WHITLEY AVE	1D
140		2000 GRACE AVE	1D
141		2000 N LAS PALMAS AVE	1D
142		2002 WHITLEY AVE	1D
143		2006 N LAS PALMAS AVE	1D
144		2008 N LAS PALMAS AVE	1D
145		2008 WHITLEY AVE	1D
146		2010 HOLLY HILL TER	1D
147		2011 HOLLY HILL TER	1D
148		2014 GRACE AVE	1D
149		2014 N LAS PALMAS AVE	1D
150		2014 WHITLEY AVE	1D
151		2015 WHITLEY AVE	1D
152		2017 HOLLY HILL TER	1D
153		2018 WHITLEY AVE	1D
154		2019 GRACE AVE	1D
155		2020 N LAS PALMAS AVE	1D
156		2020 WHITLEY TERRACE STEPS	1D
157		2021 HOLLY HILL TER	1D
158		2021 WHITLEY TERRACE STEPS	1D
159		2022 HOLLY HILL TER	1D
160		2022 WHITLEY AVE	1D
161		2025 GRACE AVE	1D
162		2025 HOLLY HILL TER	1D

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

163		2026 HOLLY HILL TER	1D
164		2026 N LAS PALMAS AVE	1D
165		2031 HOLLY HILL TER	1D
166		2031 WHITLEY TER	1D
167		2032 N LAS PALMAS AVE	1D
168		2034 GRACE AVE	1D
169		2034 N LAS PALMAS AVE	1D
170		2036 HOLLY HILL TER	1D
171		2037 HOLLY HILL TER	1D
172		2037 WHITLEY TER	1D
173		2038 N LAS PALMAS AVE	1D
174		2040 N LAS PALMAS AVE	1D
175		2042 N LAS PALMAS AVE	1D
176		2044 GRACE AVE	1D
177		2047 GRACE AVE	1D
178		2049 N LAS PALMAS AVE	1D
179		2050 N LAS PALMAS AVE	1D
180		2055 N LAS PALMAS AVE	1D
181		2059 WATSONIA TER	1D
182		2064 WATSONIA TER	1D
183		2068 WATSONIA TER	1D
184		2075 WATSONIA TER	1D
185		2139 FAIRFIELD AVE	1D
186		2145 FAIRFIELD AVE	1D
187		6510 CERRITOS PL	1D
188		6526 CERRITOS PL	1D
189		6532 CERRITOS PL	1D
190		6538 BELLA VISTA WAY	1D
191		6542 BELLA VISTA WAY	1D
192		6603 EMMET TER	1D
193		6607 PADRE TER	1D
194		6609 WHITLEY TER	1D
195		6610 PADRE TER	1D
196		6611 EMMET TER	1D
197		6612 WHITLEY TER	1D
198		6613 WHITLEY TER	1D
199		6614 EMMET TER	1D
200		6621 PADRE TER	1D
201		6621 WHITLEY TER	1D
202		6624 WHITLEY TER	1D
203		6633 EMMET TER	1D
204		6633 WHITLEY TER	1D
205		6636 EMMET TER	1D

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

206		6640 WHITLEY TER	1D
207		6642 EMMET TER	1D
208		6643 EMMET TER	1D
209		6646 WHITLEY TER	1D
210		6652 WHITLEY TER	1D
211		6654 WHITLEY TER	1D
212		6655 EMMET TER	1D
213		6657 EMMET TER	1D
214		6658 EMMET TER	1D
215		6661 EMMET TER	1D
216		6662 EMMET TER	1D
217		6663 BON AIR PL	1D
218		6670 WHITLEY TER	1D
219		6673 EMMET TER	1D
220		6674 BON AIR PL	1D
221		6674 WHITLEY TER	1D
222		6676 EMMET TER	1D
223		6679 HOLLYWOOD BLVD	1D
224		6680 BON AIR PL	1D
225		6680 EMMET TER	1D
226		6688 WHITLEY TER	1D
227		6690 WHITLEY TER	1D
228		6694 WHITLEY TER	1D
229		6698 WHITLEY TER	1D
230		6707 MILNER ROAD	1D
231		6708 MILNER ROAD	1D
232		6711 WHITLEY TER	1D
233		6717 MILNER ROAD	1D
234		6717 WHITLEY TER	1D
235		6726 MILNER ROAD	1D
236		6727 MILNER ROAD	1D
237		6733 WEDGEWOOD PL	1D
238		6735 WEDGEWOOD PL	1D
239		6740 WHITLEY TER	1D
240		6742 WEDGEWOOD PL	1D
241		6746 MILNER ROAD	1D
242		6750 WEDGEWOOD PL	1D
243		6753 MILNER ROAD	1D
244		6755 WEDGEWOOD PL	1D
245		6756 MILNER ROAD	1D
246		6757 MILNER ROAD	1D
247		6758 MILNER ROAD	1D
248		6758 WEDGEWOOD PL	1D

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

249		6760 MILNER ROAD	1D
250		6763 WHITLEY TER	1D
251		6764 MILNER ROAD	1D
252		6767 WEDGEWOOD PL	1D
253		6767 WHITLEY TER	1D
254		6776 MILNER ROAD	1D
255		6782 MILNER ROAD	1D
256		6796 MILNER ROAD	1D
257		6806 HOLLYWOOD BLVD	1D
258		7055 HOLLYWOOD BLVD	1D
259	C E TOBERMAN ESTATE	1847 CAMINO PALMERO	1S
260	CAHUENGA BRANCH LIBRARY	4591 W SANTA MONICA BLVD	1S
261	CROSSROADS OF THE WORLD	6671 SUNSET BLVD	1S
262	EL GRECO APARTMENTS	817 N HAYWORTH AVE	1S
263	ENGINE COMPANY #27, HOLLYWOOD FIRE	1355 N CAHUENGA BLVD	1S
264	EXECUTIVE OFFICE BUILDING/OLD WARNE	5800 SUNSET BLVD	1S
265	FREMONT, JOHN C., LIBRARY, LA BRACH	6121 MELROSE AVE	1S
266	HIGHLAND-CAMROSE BUNGALOW VILLAGE	N HIGHLAND AVE	1S
267	HOLLYWOOD MEMORIAL PARK CEMETERY	6000 SANTA MONICA BLVD	1S
268	HOLLYWOOD STUDIO CLUB	1215 LODI PL	1S
269	HOLLYWOOD TOWER / LA BELLE TOUR	6200 FRANKLIN AVE	1S
270	JARDINETTE APARTMENTS	5128 MARATHON ST	1S
271	LOVELL HOUSE / HEALTH HOUSE	4616 DUNDEE DR	1S
272	SOWDEN, JOHN, HOUSE	5121 FRANKLIN AVE	1S
273	ST ANDREWS BUNGALOW COURT	1514 N ST ANDREWS PL	1S
274	STORER HOUSE	8161 HOLLYWOOD BLVD	1S
275	THE ANDALUSIA BUILDING 1	1471 HAVENHURST DR	1S
276	THE HALIFAX APARTMENTS	6376 YUCCA ST	1S
277	THE MONTECITO APARTMENTS	6650 FRANKLIN AVE	1S
278	THE VILLA BONITA	1817 HILLCREST DR	1S
279	U. S. POST OFFICE, HOLLYWOOD STATIO	1615 N WILCOX AVE	1S

**California Register of Historic Places***Districts*

	<b>Resource Name</b>		<b>Status Code</b>
	AFTON SQUARE DISTRICT CONTRIBUTOR		2D2
	EAST HOLLYWOOD BOULEVARD DISTRICT		2D2
	HOLLYWOOD RESERVOIR COMPLEX		2S2
	HOLLYWOOD RESERVOIR COMPLEX/ CARETA		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ GLORYH		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ HOLLYW		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ LAVATO		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ LOWER		2D2

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**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

	HOLLYWOOD RESERVOIR COMPLEX/ MULHOL		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ SEARCH		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ UPPER		2D2
	HOLLYWOOD RESERVOIR COMPLEX/ WEIR T		2D2
	SELMA-LABAIG DISTRICT CONTRIBUTOR		2D2
	SERRANO DISTRICT		2D2
	TOBERMAN STORAGE COMPANY, BEKINS VA		2D3
	VISTA DEL MAR/CARLOS DISTRICT		2D2
<i>Individually Listed/District Contributor</i>			
<b>Map Key#</b>	<b>Resource Name</b>	<b>Address</b>	<b>Status Code</b>
280	EL CADIZ APARTMENTS	1725 N SYCAMORE AVE	2
281	GRIFFITH OBSERVATORY, GRIFFITH PARK	2800 E OBSERVATORY ROAD	2B
282	GRANT ELEMENTARY SCHOOL	1530 WILTON PL	2D2
283	GRIFFITH PARK - MOUNT HOLLYWOOD	RIVERSIDE DR	2D2
284	GRIFFITH PARK-ASTRONOMERS' MONUMENT	RIVERSIDE DR	2D2
285	GRIFFITH PARK-BIRD SANCTUARY	RIVERSIDE DR	2D2
286	GRIFFITH PARK-BOYS' CAMP	RIVERSIDE DR	2D2
287	GRIFFITH PARK-FERNDILL	RIVERSIDE DR	2D2
288	GRIFFITH PARK-HARDING GOLF COURSE C	RIVERSIDE DR	2D2
289	GRIFFITH PARK-LOS FELIZ ADOBE	RIVERSIDE DR	2D2
290	GRIFFITH PARK-MERRY-GO-ROUND	RIVERSIDE DR	2D2
291	GRIFFITH PARK-SWIMMING POOL AND BLD	RIVERSIDE DR	2D2
292	HOLLYWOOD HOTEL / EAST HOLLYWOOD BO	5211 HOLLYWOOD BLVD	2D2
293	LE CONTE MIDDLE SCHOOL AUDITORIUM	1316 N BRONSON AVE	2D2
294	LOS FELIZ ELEMENTARY SCHOOL-AUDITOR	1740 N NEW HAMPSHIRE AVE	2D2
295	LOS FELIZ ELEMENTARY SCHOOL-MAIN BU	1740 N NEW HAMPSHIRE AVE	2D2
296	VINE STREET ELEMENTARY SCHOOL-AUDIT	955 N VINE ST	2D2
297	VINE STREET ELEMENTARY SCHOOL-MAIN	955 N VINE ST	2D2
298		5216 HOLLYWOOD BLVD	2D2
299		5225 HOLLYWOOD BLVD	2D2
300		5822 HAROLD WAY	2D2
301		6000 CARLTON WAY	2D2
302		6004 CARLTON WAY	2D2
303		6008 CARLTON WAY	2D2
304		6012 CARLTON WAY	2D2
305		6016 CARLTON WAY	2D2
306		6018 CARLTON WAY	2D2
307		6036 CARLTON WAY	2D2
308		6046 CARLTON WAY	2D2
309		6048 CARLTON WAY	2D2
310		6054 CARLTON WAY	2D2
311		6056 HAROLD WAY	2D2
312		6057 HAROLD WAY	2D2

Data for properties listed in the National Register of Historic Places and the California Register of Historical Resources (Status Codes 1 and 2) are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.

**Table 4.9-1: Designated Historic Resources in the Hollywood Community Plan Area**

313		6060 HAROLD WAY	2D2
314		6063 HAROLD WAY	2D2
315		6065 HAROLD WAY	2D2
316		6066 HAROLD WAY	2D2
317		6067 HAROLD WAY	2D2
318		6071 HAROLD WAY	2D2
319		6075 HAROLD WAY	2D2
320		6081 HAROLD WAY	2D2
321		6085 HAROLD WAY	2D2
322		6091 HAROLD WAY	2D2
323	TRIANON APARTMENTS	1750 N SERRANO AVE	2D3
324	ATKINSON/FARNUM/SWAIN RES	2003 N LA BREA TER	2S2
325	CALIFORNIA BANK/PRECISION AUTO BUIL	5618 HOLLYWOOD BLVD	2S2
326	CAPITOL RECORDS TOWER	1750 VINE ST	2S2
327	CHILDREN'S HOSPITAL-UAP BUILDING	1153 N WESTMORELAND AVE	2S2
328	DUNNING HOUSE	5552 CARLTON WAY	2S2
329	DURFEE RESIDENCE	2003 N LA BREA TER	2S2
330	FLEUR DE LIS / WHITLEY APARTMENTS	1825 WHITLEY AVE	2S2
331	FRANKLIN TOWNHOUSES	5640 FRANKLIN AVE	2S2
332	FRENCH-AMERICAN BUILDING / ARA'S PA	4949 HOLLYWOOD BLVD	2S2
333	GARDEN COURT APARTMENTS	7021 HOLLYWOOD BLVD	2S2
334	GRIFFITH PARK	RIVERSIDE DR	2S2
335	HOLLYWOOD BOWL	2301 N HIGHLAND AVE	2S2
336	HOLLYWOOD METHODIST CHURCH	6817 FRANKLIN AVE	2S2
337	HOLLYWOOD PRESBYTERIAN MED C	1300 N VERMONT AVE	2S2
338	HOLLYWOOD SPORTS CAR	5766 HOLLYWOOD BLVD	2S2
339	HOLLYWOOD WALK OF FAME	HOLLYWOOD BLVD	2S2
340	HOLLYWOOD WESTERN BUILDING/MAYER BU	5500 HOLLYWOOD BLVD	2S2
341	HOLLYWOOD YMCA	1553 SCHRADER BLVD	2S2
342	LE CONTE JUNIOR HIGH SCHOOL- MAIN B	1316 N BRONSON AVE	2S2
343	LITTLE COUNTRY CHURCH OF HOLLYWOOD	1750 ARGYLE AVE	2S2
344	LOS FELIZ ELEMENTARY SCHOOL	1740 N NEW HAMPSHIRE AVE	2S2
345	NICHOLAS PRIESTER BUILDING	1101 N VERMONT AVE	2S2
346	SALVATION ARMY TABERNACLE	5941 HOLLYWOOD BLVD	2S2
347	SANTA MONICA BOULEVARD ELEMENTARY S	1022 N VAN NESS AVE	2S2
348	SECURITY FIRST NATIONAL BANK	1101 N WESTERN AVE	2S2
349	THE LOS FELIZ MANOR	4643 LOS FELIZ BLVD	2S2
350	VINE STREET ELEMENTARY SCHOOL	955 N VINE ST	2S2
351		1055 N KINGSLEY DR	2S2
352		1921 WHITLEY AVE	2S2
353		5611 HOLLYWOOD BLVD	2S2
354		6500 YUCCA ST	2S2
355		7357 FRANKLIN AVE	2S2

Data for properties listed in the National Register of Historic Places and the California Register of Historical Resources (Status Codes 1 and 2) are based on the 2008 California State Historic Resources Inventory (HRI) maintained by the California Office of Historic Resources. The City takes no responsibility for the accuracy of data in the State HRI, including any errors in California Historic Resources Status Codes. Data on HCMs and HPOZs are provided from, and maintained by, the Office of Historic Resources, Department of City Planning.

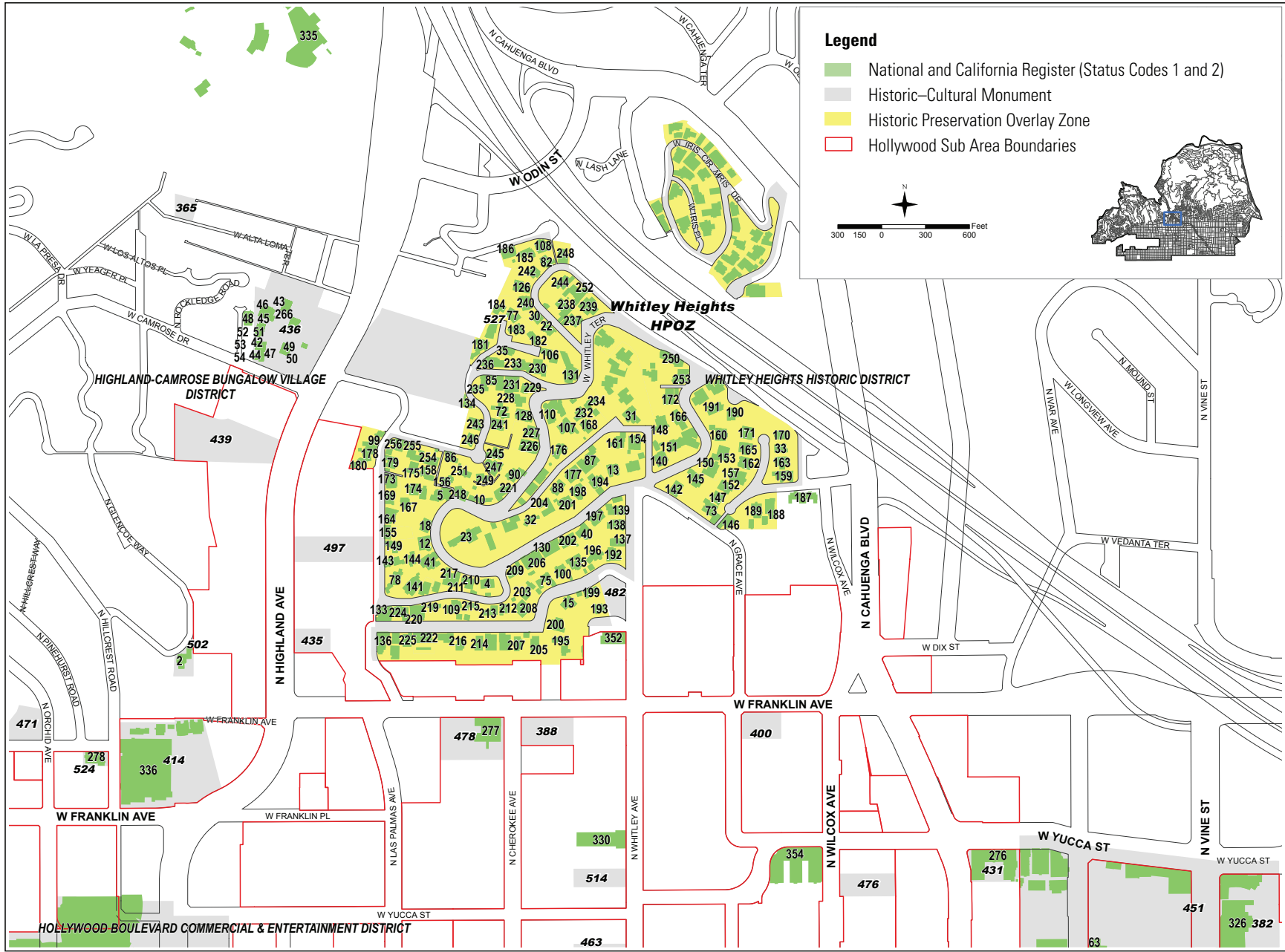


Figure 4.9-5a  
**Historic Resources within the Hollywood Community Plan Area**  
 083:08.31.11

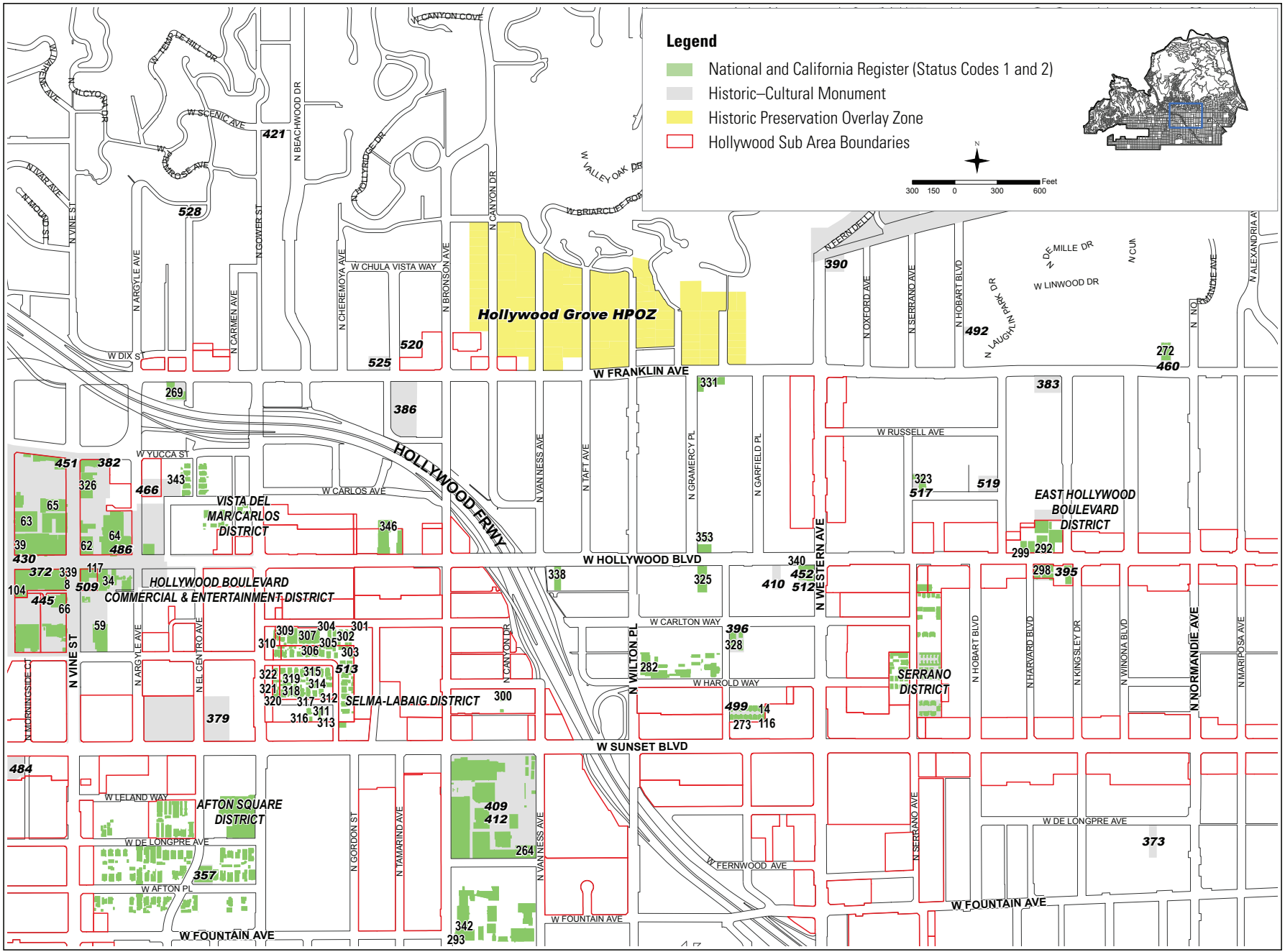


Figure 4.9-5b

**Historic Resources within the Hollywood Community Plan Area**

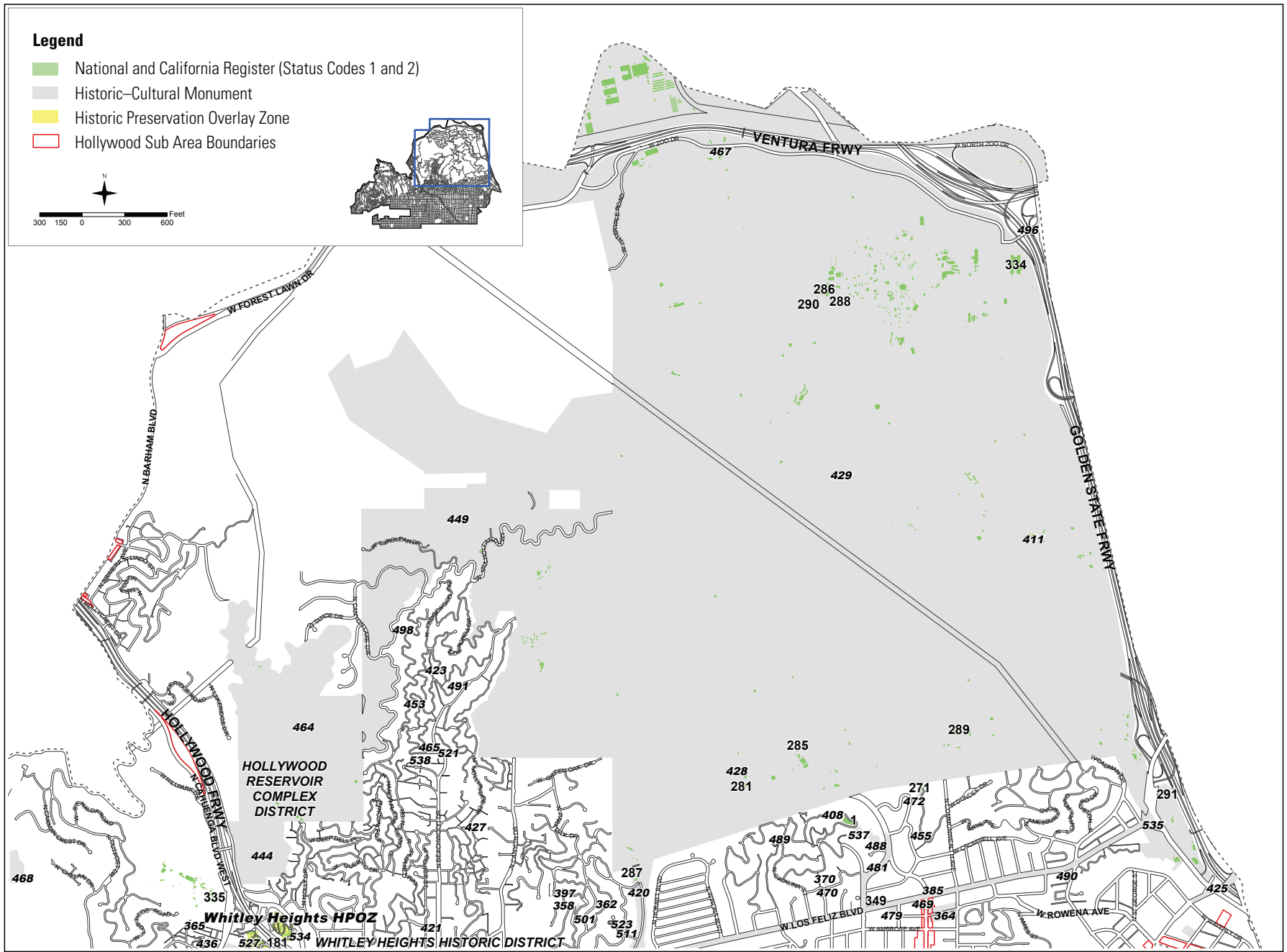


Figure 4.9-5c

**Historic Resources within the Hollywood Community Plan Area**

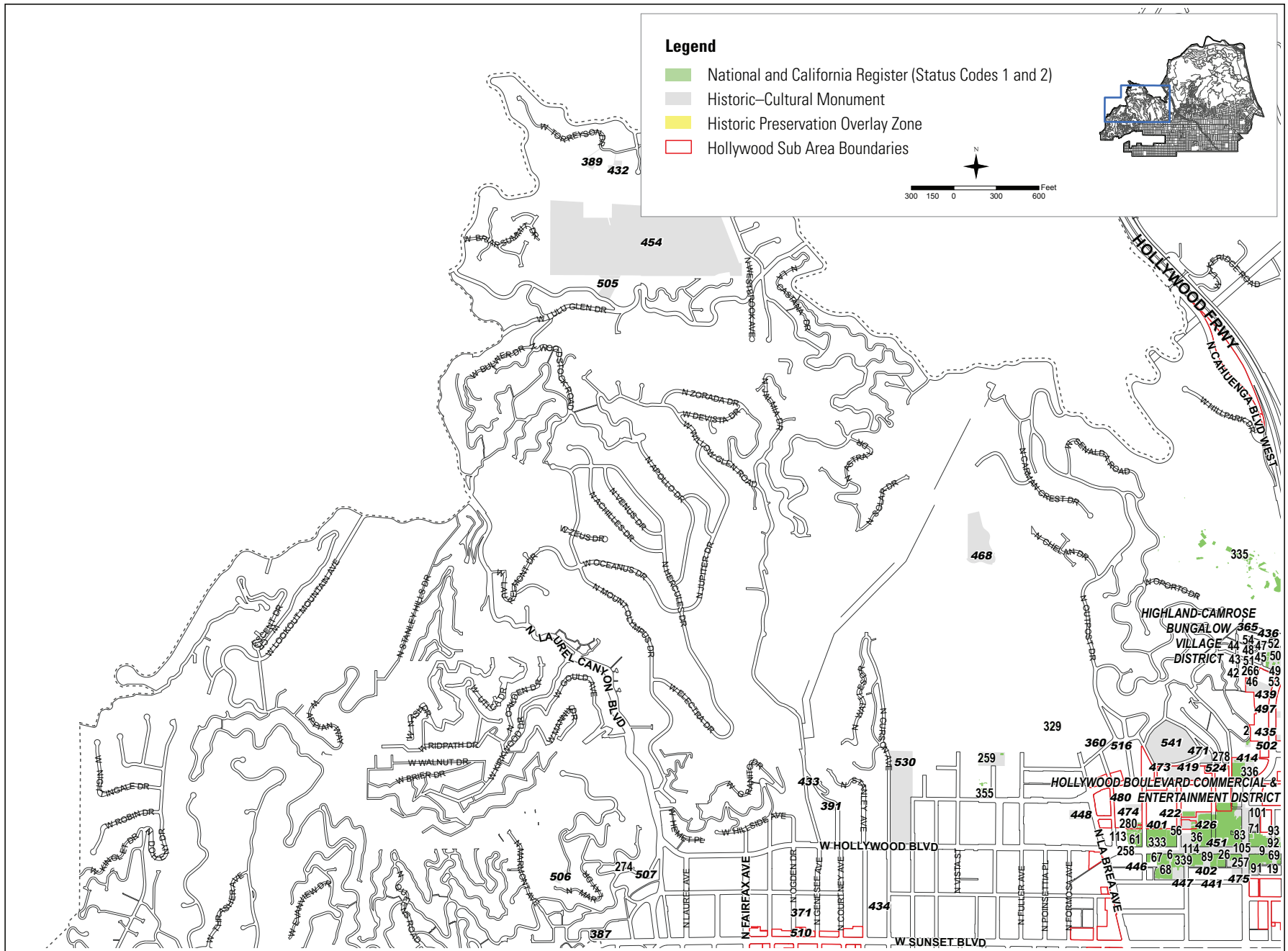


Figure 4.9-5d

**Historic Resources within the Hollywood Community Plan Area**



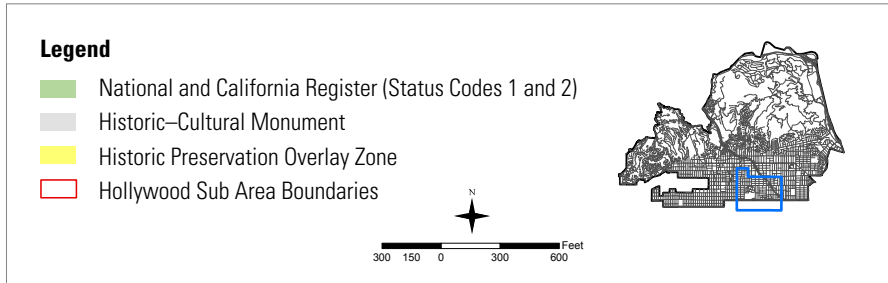
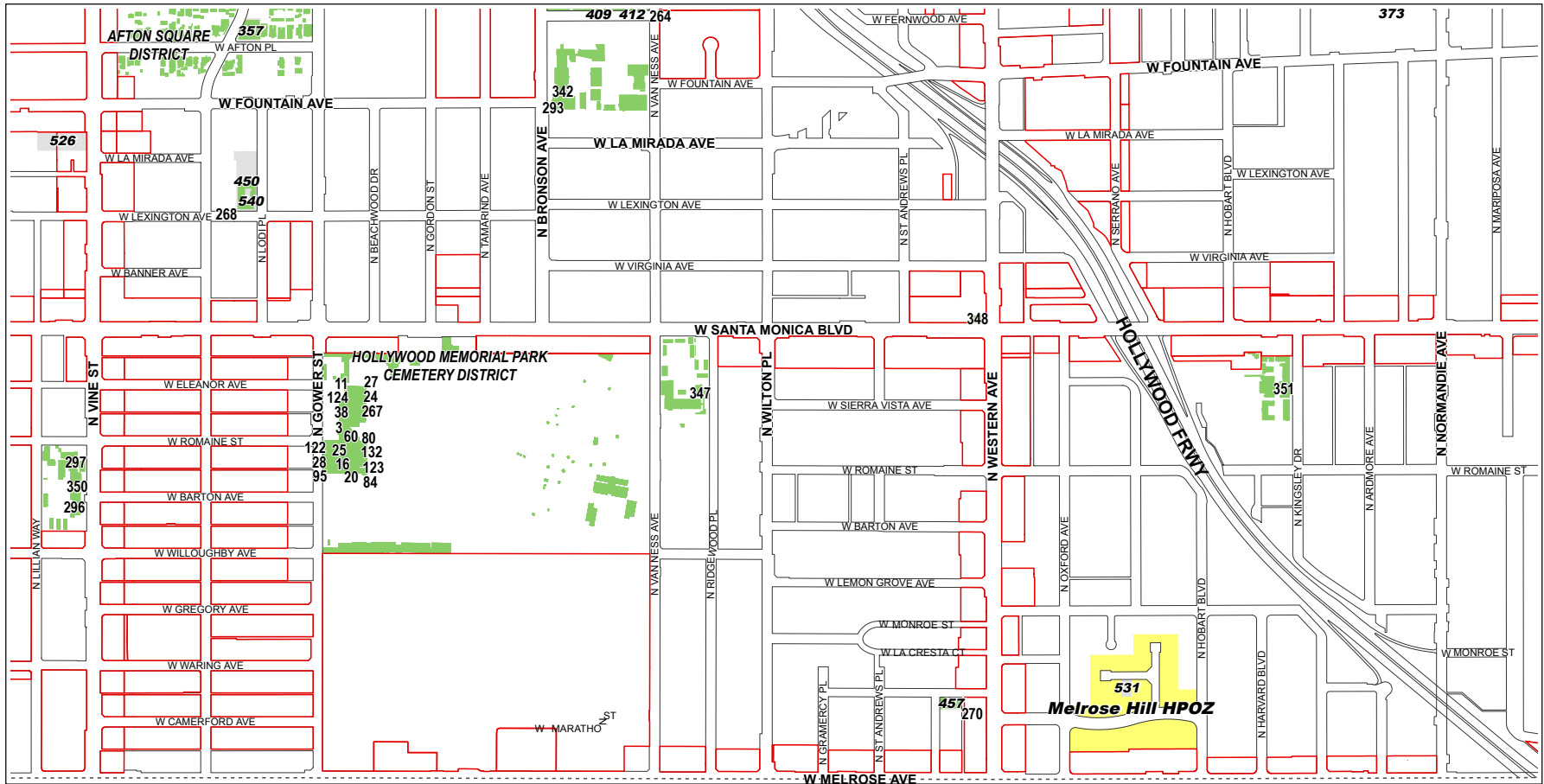


Figure 4.9-5e

### Historic Resources within the Hollywood Community Plan Area

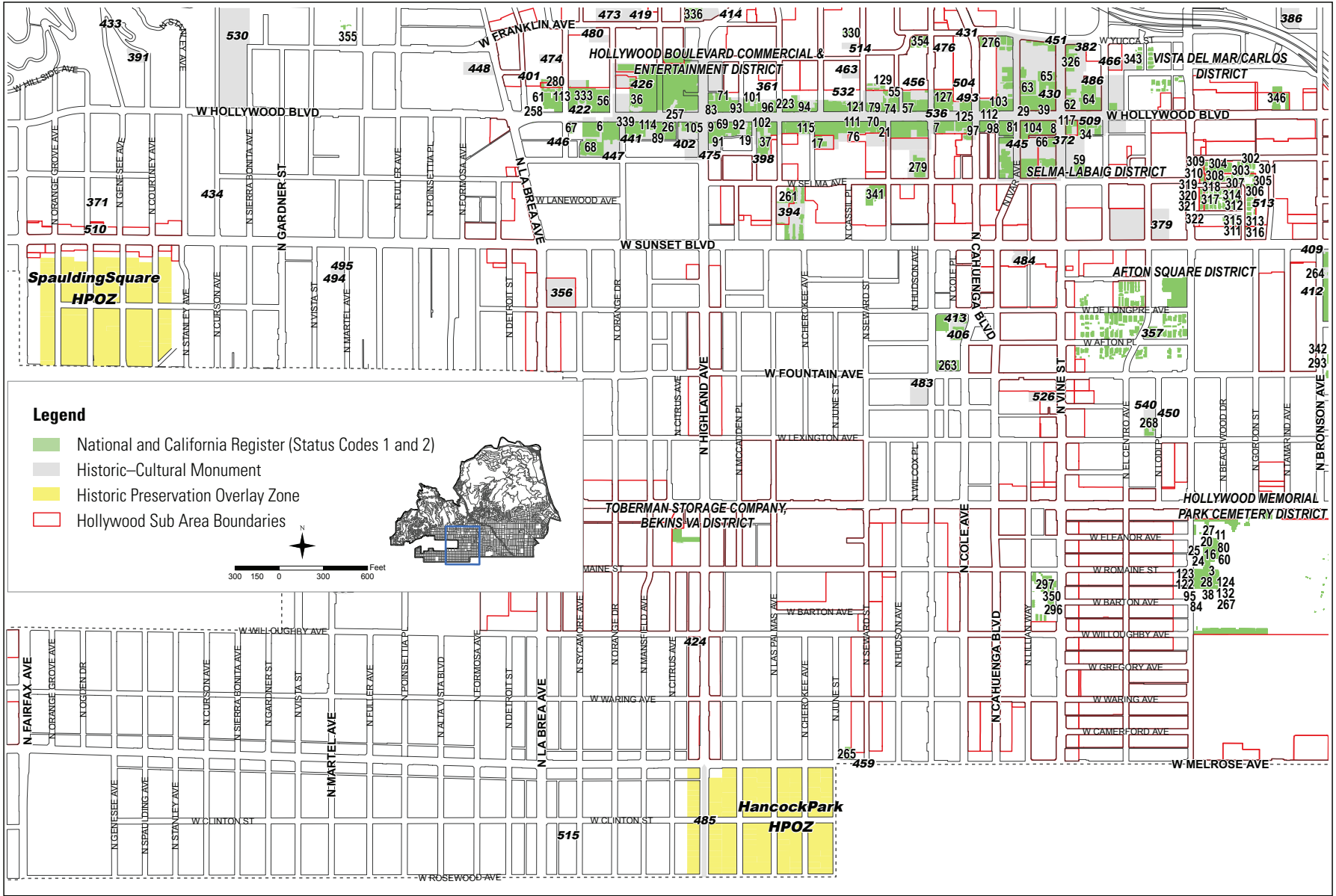


Figure 4.9-5f

**Historic Resources within the Hollywood Community Plan Area**

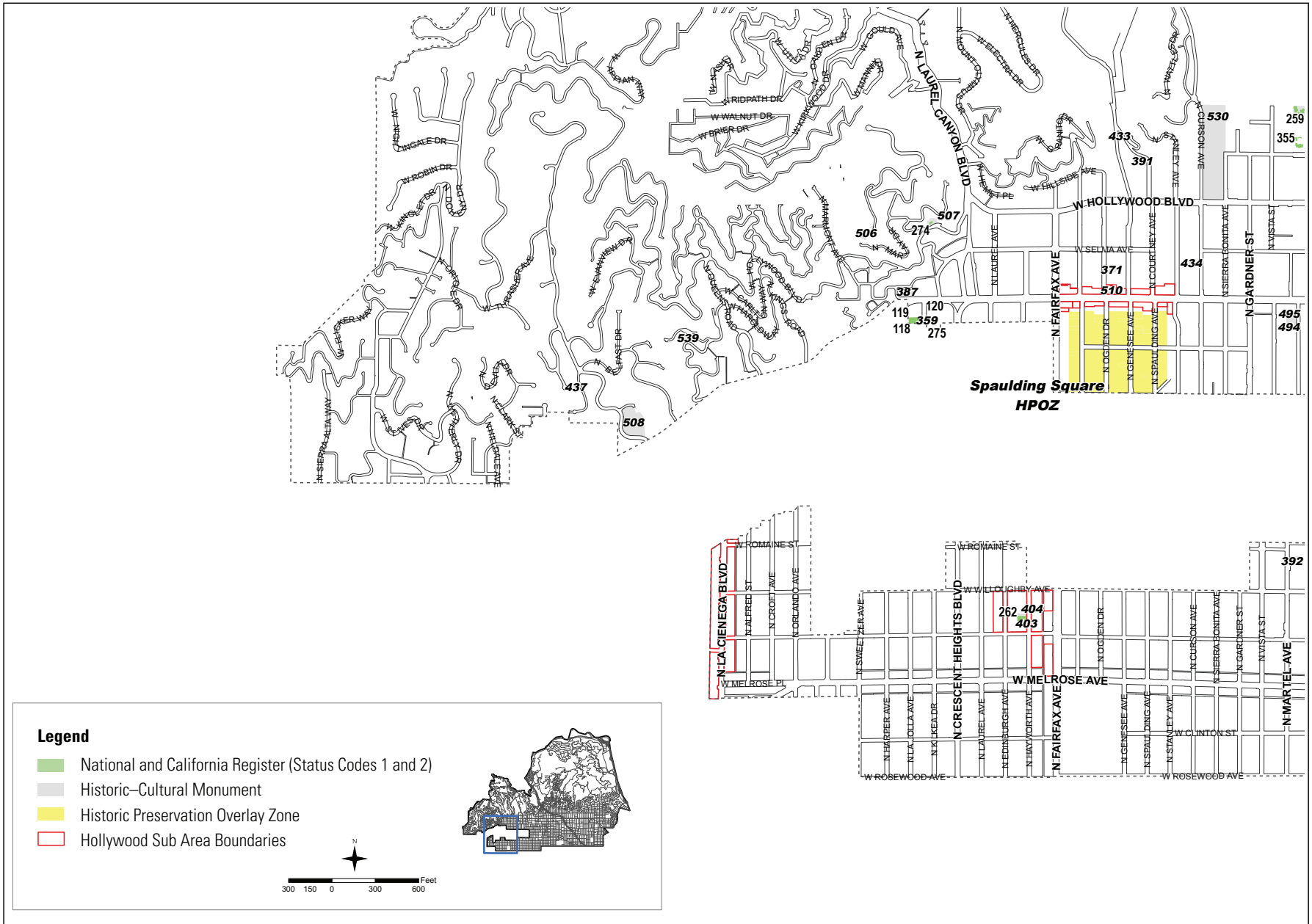


Figure 4.9-5g

## Historic Resources within the Hollywood Community Plan Area

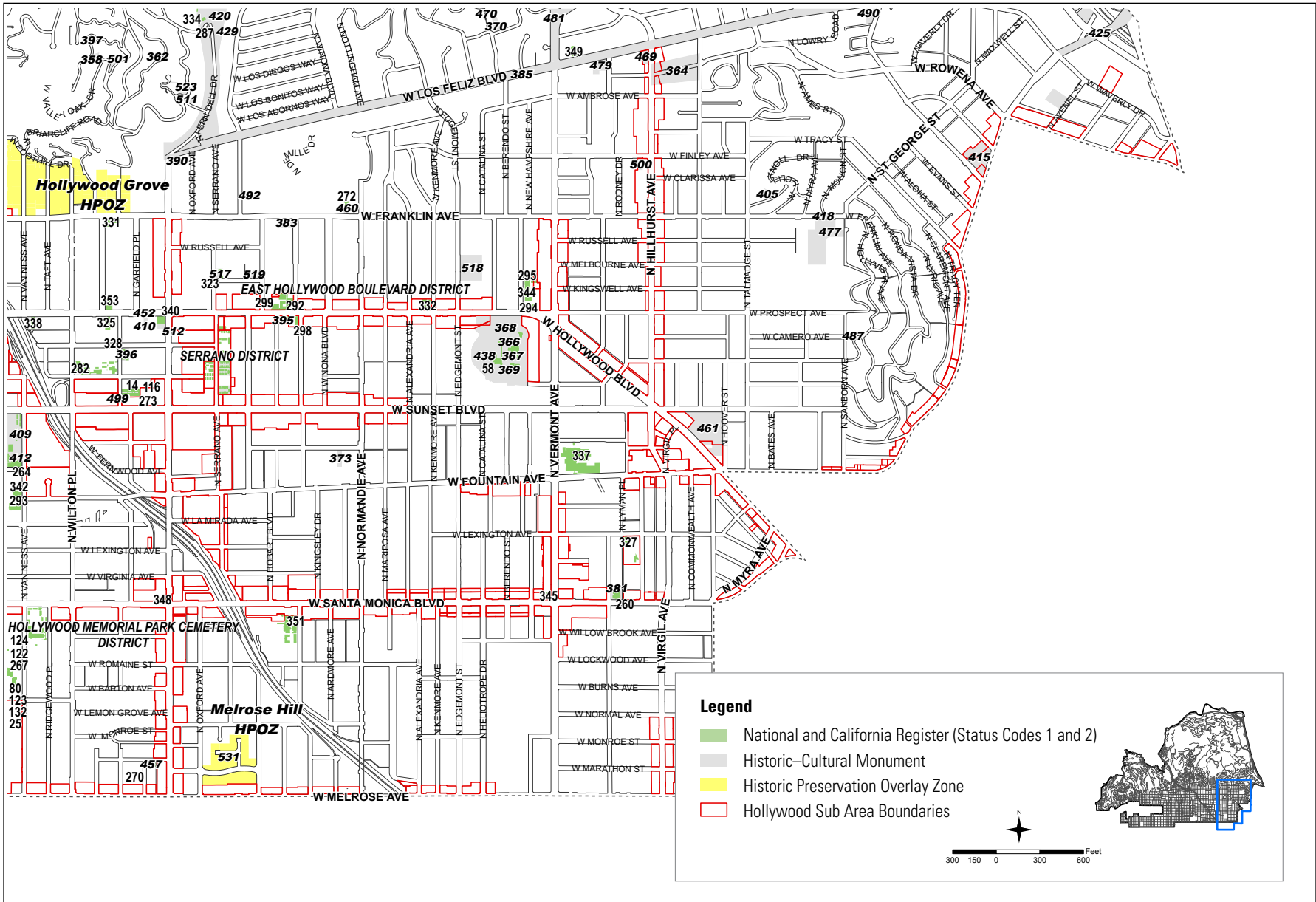


Figure 4.9-5h

**Historic Resources within the Hollywood Community Plan Area**

Page 4.9-23, the following is added above the subheading *East Hollywood/Beverly Normandie Earthquake Disaster Assistance Project*:

Survey data from the CRA's Hollywood Historic Resources Survey Update are in draft format and undergoing a formal review process that includes public hearings. Information on the CRA survey can be obtained from Kip Rudd, Hollywood Redevelopment Area at [crudd@cra.lacity.org](mailto:crudd@cra.lacity.org) or (323) 960-2668.

Page 4.9-26, LU 1.6 should refer to the National Register of Historic Places Resources.

Page 4.9-33, the following clarifying language is added to the end of the last paragraph:

This finding of potential significance plan-wide is made because a comprehensive survey of archeological/paleontological resources in the Hollywood area was not feasible at the Plan level. As environmental review is conducted on a site-by-site basis, where a Phase I survey documents that potential impacts to individual sites is anticipated to be low impacts will be found to be less than significant. For those projects that do not disturb previously undisturbed soil no analysis will be required to make a finding of less than significance.

Page 4.9-28, Figure 4.9-4, Los Feliz HPOZ (proposed) is deleted Hollywood Grove is added as a designated HPOZ (bounded by Canyon Drive on the west, Saint Andrews Place on the east, Foothill Drive on the north and Franklin Avenue on the south).

## **SAFETY**

Page 4.10-6 (as well as in the Summary Table), mitigation measures 1 and 2 are revised as follows:

1. As part of the discretionary review of individual projects, the City shall ensure that potential hazards are evaluated and mitigated consistent with State Law, City Code and recommendations of the City Building and Safety and Fire Departments, State Department of Toxic Substances Control, Regional Water Quality Control Board and South Coast Air Quality Management District, as appropriate. The evaluation of hazards shall consider all hazards that might be applicable to an individual project/site including but not limited to, methane gas, lead-based paint, asbestos, potential presence of hazardous materials associated with past use of a site, potential chemicals proposed to be used on-site, and emergency access. ~~all pertinent safety/mitigation standards in the City's Building Code, Fire Code and Planning and Zoning Code are met;~~ the City shall prohibit the construction of any building where there is potential for methane gas hazards; and for instances where there is significant methane gas detected, the developer must immediately notify the City's Building and Safety Department and the Southern California Air Quality Management District.
2. As part of the review of individual discretionary projects, the City will ~~require~~ ensure that appropriate mitigation measures are identified and required prior to approval of residential or public facility projects within 1,000 feet of a site known to be releasing substantial hazardous materials or wastes (as defined by the State of California), that could present a hazard to proposed development. ~~designated hazardous site/condition.~~ These measures should address considerations of setbacks and buffers, barriers, risk of upset plans and safety evacuation plans.

**ALTERNATIVES**

Page 5-3, Table 5-2, a new row is added to show the 2010 Census Population of 198,228.

Page 5-3, Table 5-3, a new row is added to show the 2010 Census housing units: Single family: 20,927, Multi-family: 82,260, Total: 103,187.

**APPENDICES**

A map showing Proposed Land Use is added to the Plan and EIR Appendices (it would become Appendix A.7). Due to the size of the map it is not included in print copies of the Final EIR; it can be found on the CD and on-line.

## **MITIGATION MONITORING AND REPORTING PROGRAM**

Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines require adoption of a Mitigation Monitoring or Reporting Program (MMRP) for all projects for which an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180 which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the California Environmental Quality Act (CEQA) process. Specifically, Section 21081.6 of the Public Resources Code states that "...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program]...shall be designed to ensure compliance during project implementation."

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in Section 15097 of the CEQA Guidelines. Specific reporting and/or monitoring requirements to be enforced during project implementation are defined prior to final approval of the project. The proposed monitoring and reporting program will be considered by the City of Los Angeles (the lead agency) prior to certification of the EIR. Although the lead agency may delegate reporting or monitoring responsibilities to other agencies or entities, it "...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The Mitigation Monitoring and Reporting Program describes the procedures for the implementation of the mitigation measures to be adopted for the proposed project as identified in the Draft and Final EIR. The MMRP for the proposed project will be in place through all phases of the project. While the Proposed Project is a planning document, it is anticipated that development that occurs pursuant to the plan will include the following phases: design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy), and therefore some mitigation measures are tied to these phases. The City is responsible for administering the MMRP activities. The City may choose to delegate parts of the Plan (particularly enforcement and monitoring) to staff, other City departments (e.g., Department of Building and Safety, Department of Public Works, etc.), consultants, or contractors. The City will ensure that monitoring is documented through reports (as required) and that deficiencies are promptly corrected. On a project-by-project basis the City may choose to designate one or more environmental monitor(s) (e.g. City building inspector, project contractor, certified professionals, etc., depending on the provision specified below). The City will ensure that measures are tracked, that compliance with mitigation measures is documented as City staff deem appropriate on a case-by-case basis, that any problems that may result are noted, and that appropriate actions to remedy problems are taken.

Each mitigation measure is categorized by impact area, with an accompanying identification of:

The implementing agency

The enforcement agency and monitoring agency;

The monitoring phase (i.e., the phase of the project during which the measure should be monitored) and monitoring frequency; and

**1. Land Use**

**Mitigation Measures**

1. Implement the Urban Design Policies, Guidelines, and Standards included in the Proposed Plan.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-Construction

2. Implement Specific Plans and/or Community Design Overlay (CDO) Districts to address proposed development standards.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-Construction

3. Implement Transit Oriented Districts (TODs) and/or Pedestrian Oriented Districts (PODs) to mitigate the impacts of increased residential and commercial intensity where appropriate.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-Construction

4. The City shall ensure that review of individual discretionary projects shall address aesthetic concerns as appropriate to minimize site-specific aesthetic impacts, including impacts to views, scenic resources, lighting, and shading.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-Construction

**2. Population, Employment and Housing**

There would be no significant impact and mitigation measures are not required. The Proposed Plan includes policies and zoning controls to address any potential impacts.

**3. Public Services**

***A. Fire Protection Services***

**Mitigation Measures**

In addition to the Fire Protection and Prevention Plan and the Safety Plan, the proposed Hollywood Community Plan incorporates programs and policies that help mitigate community-specific fire and emergency response issues. In addition to these programs and policies, the following mitigation measures are proposed:

1. Identify areas of the Hollywood CPA with deficient fire protection facilities and/or services and prioritize the order in which the areas should be upgraded to established fire protection standards to ensure acceptable fire protection at all times.



Implementing Agency	Fire Dept.
Enforcement and Monitoring Agency	Fire Dept.
Monitoring Phase	Plan implementation

- Continue to require, in coordination with the Fire Department, adequate fire service capacity prior to the approval of proposed developments in areas currently located outside of the service areas or capability of existing city fire stations.

Implementing Agency	Fire Dept. and Dept. of Building and Safety
Enforcement and Monitoring Agency	Fire Dept. and Dept. of Building and Safety
Monitoring Phase	Plan check and approval, pre-construction

- Promote continued mutual assistance agreements with neighboring cities, the County of Los Angeles, and other applicable agencies for the provision of fire protection services to the residents of the Hollywood CPA.

Implementing Agency	Fire Dept.
Enforcement and Monitoring Agency	Fire Dept.
Monitoring Phase	Plan implementation

- Implement the Hollywood Transportation Improvement and Mitigation Program (TIMP) contained in **Section 4.5** of the DEIR (Transportation) to improve traffic conditions thereby improving fire and life safety in the community.

Implementing Agency	Dept. of Transportation
Enforcement and Monitoring Agency	Dept. of Transportation
Monitoring Phase	Plan implementation

***B. Police Protection***

**Mitigation Measures**

The Proposed Hollywood Community Plan incorporates programs and which help mitigate significant adverse impacts it may have on the provision of police protection to the residents Hollywood CPA. In addition to these programs and policies, the following mitigation measures are proposed:

- Hire and deploy additional police officers and civilian personnel to accommodate growth or development generated by the implementation of the Proposed Plan pursuant to LAPD hiring and deployment procedures.

Implementing Agency	Police Dept.
Enforcement and Monitoring Agency	Police Dept.
Monitoring Phase	Plan implementation

- Expand and/or upgrade existing police protection equipment and/or facilities in areas of the CPA that do not receive adequate police protection services.

Implementing Agency	Police Dept.
Enforcement and Monitoring Agency	Police Dept.
Monitoring Phase	Plan implementation

- Purse State, Federal and other non-conventional funding sources to expand the number of sworn police officers.

Implementing Agency	Police Dept.
Enforcement and Monitoring Agency	Police Dept.
Monitoring Phase	Plan implementation

- Promote the establishment of police facilities that provide police protection at a neighborhood level.

Implementing Agency	Police Dept.
Enforcement and Monitoring Agency	Police Dept.
Monitoring Phase	Plan implementation

- Implement the Hollywood Transportation Improvement and Mitigation Program (TIMP) contained in Section 4.5 of the DEIR (Transportation), to improve traffic conditions thereby improving police response times in the community.

Implementing Agency	Dept. of Transportation
Enforcement and Monitoring Agency	Dept. of Transportation
Monitoring Phase	Plan implementation

***C. Public Libraries***

There would be no significant impact and mitigation measures are not required. The Proposed Hollywood Community Plan includes policies that help mitigate potential significant adverse impact.

***D. Parks***

**Mitigation Measures**

The Proposed Hollywood Community Plan incorporates programs and policies that help mitigate potential significant adverse impacts. In addition to these programs and policies, the following mitigation measures are proposed:

- Develop City or private funding programs for the acquisition and construction of new Community and Neighborhood recreation and park facilities.

Implementing Agency	Dept. of Recreation and Parks
Enforcement and Monitoring Agency	Dept. of Recreation and Parks
Monitoring Phase	Plan implementation

- Prioritize the implementation of recreation and park projects in parts of the CPA with the greatest existing deficiencies.

Implementing Agency	Dept. of Recreation and Parks
Enforcement and Monitoring Agency	Dept. of Recreation and Parks
Monitoring Phase	Plan implementation

- Establish joint-use agreements with the Los Angeles Unified School District and other public and private entities that could contribute to the availability of recreational opportunities in the CPA.

Implementing Agency	Dept. of Recreation and Parks
Enforcement and Monitoring Agency	Dept. of Recreation and Parks
Monitoring Phase	Plan implementation

4. Monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the Hollywood CPA.

Implementing Agency	Dept. of Recreation and Parks
Enforcement and Monitoring Agency	Dept. of Recreation and Parks
Monitoring Phase	Plan implementation

5. The City shall ensure that individual discretionary projects within the Hollywood Planning Area comply with the Los Angeles Municipal Code with respect to provision of open space and recreational facilities. Compliance with this measure shall be sufficient to mitigate project-specific and cumulative impacts to Parks and Recreation.

Implementing Agency	Dept. of City Planning and Dept. of Recreation and Parks
Enforcement and Monitoring Agency	Dept. of City Planning and Dept. of Recreation and Parks
Monitoring Phase	Pre-construction

***E. Public Schools***

**Mitigation Measures**

The Proposed Hollywood Community Plan incorporates programs and policies that would help mitigate any significant adverse impacts it may have on the provision of public educational facilities to the residents of the Hollywood CPA. In addition to these programs and policies, the following mitigation measures are proposed:

1. Develop plans to address issues relating to siting and the joint use of facilities. To this end, identify strategies for the expansion of the school facilities, including:
  - a. Siting of schools and other community facilities (libraries, parks, ect.) within transit stations, centers or mixed-use areas so that they can complement each other and make the most use of the land provided for these services;
  - b. Locating middle schools and high schools close to transit stations and key centers, where possible, so that students can use the transit system to get to and from school;
  - c. Encouraging private redevelopment of existing school sites in the immediate vicinity of transit station and centers so that the existing site (a low intensity site) would be replaced by a high intensity mixed-use development that would incorporate school facilities.

Implementing Agency	Dept. of City Planning and LAUSD
Enforcement and Monitoring Agency	Dept. of City Planning and LAUSD
Monitoring Phase	Plan implementation

2. Work cooperatively with LAUSD and other entities to facilitate construction of schools where necessary to accommodate increased student population.

Implementing Agency	Dept. of City Planning and LAUSD
Enforcement and Monitoring Agency	Dept. of City Planning and LAUSD
Monitoring Phase	Plan implementation

3. The City shall ensure that, prior to issuance of a building permit, project developers shall pay to LAUSD the prevailing State Department of Education Development Fee to the extent allowed by State law. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service.

Implementing Agency	Dept. of City Planning, Dept. of Building Safety and LAUSD
Enforcement and Monitoring Agency	Dept. of City Planning, Dept. of Building Safety and LAUSD
Monitoring Phase	Pre-construction

**4. Utilities**

*A. Water Resources*

**Mitigation Measures**

1. As part of review of individual projects, the Planning Department shall work with LADWP to ensure appropriate expansion, upgrade and/or improvement of the local water supply and distribution system within the CPA as may be necessary to accommodate anticipated growth.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

2. Individual projects that are consistent with the UWMP, undertake a Water Supply Analysis as required by State Law and/or comply with recommendations as appropriate identified on a site by site basis by the Department of Water and Power will be considered to not result in a cumulatively considerable contribution to this potential cumulatively significant impact unless project specific impacts are found to be significant.

Implementing Agency	Dept. of City Planning and Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of City Planning and Dept. of Water and Power
Monitoring Phase	Pre-construction

*B. Energy Resources*

**Mitigation Measures**

1. Promote energy conservation and efficiency to the maximum extent that are cost effective and practical.

Implementing Agency	Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

2. Encourage and provide incentives for the development and use of alternative sources of energy.

Implementing Agency	Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

3. Adopt and implement a program to provide technical assistance and incentives to property owners and developers on building design and/or the use of energy-efficient systems in new residential, commercial and industrial developments to exceed existing State of California Energy Code standards

Implementing Agency	Dept. of Water and Power and Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Water and Power and Dept. of Building Safety
Monitoring Phase	Plan implementation

4. Promote the responsible use of natural resources in consonance with City environmental policies.

Implementing Agency	Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

5. Expand, upgrade or improve local distribution lines and facilities within the community plan area whenever necessary to accommodate increased demand for energy.

Implementing Agency	Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

***C. Wastewater***

**Mitigation Measures**

1. Continue to implement existing water conservation measures, including ultra low-flush installation and, school educational, public information, and residential programs, and develop new ones as needed.

Implementing Agency	Dept. of Water and Power
Enforcement and Monitoring Agency	Dept. of Water and Power
Monitoring Phase	Plan implementation

2. Adopt a comprehensive water reuse ordinance that will establish, among other things, goals on reuse of reclaimed water.

Implementing Agency	Dept. of Water and Power; Bureau of Sanitation
Enforcement and Monitoring Agency	Dept. of Water and Power; Bureau of Sanitation
Monitoring Phase	Plan implementation

3. Establish water reuse demonstration and research programs and implement educational programs among consumers to increase the level of acceptance of reclaimed water.

Implementing Agency	Dept. of Water and Power; Bureau of Sanitation
Enforcement and Monitoring Agency	Dept. of Water and Power; Bureau of Sanitation
Monitoring Phase	Plan implementation

4. Provide incentives for the development of new markets and uses for reclaimed water.

Implementing Agency	Dept. of Water and Power; Bureau of Sanitation
Enforcement and Monitoring Agency	Dept. of Water and Power; Bureau of Sanitation
Monitoring Phase	Plan implementation

5. Rehabilitate existing sewers in poor structural condition and construct relief sewers to accommodate growth whenever necessary.

Implementing Agency	Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Plan implementation

6. Expand or upgrade existing local sewers in the community plan area to accommodate increased wastewater flow whenever necessary.

Implementing Agency	Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Plan implementation

7. As part of the review of individual discretionary projects, drainage and hydrology issues shall be evaluated to ensure that impacts to drainage, groundwater and water quality are mitigated as necessary to comply with State law and City Code, including the City’s Low Impact development Ordinance.

Implementing Agency	Dept. of City Planning and Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Pre-construction

***D. Solid Waste***

**Mitigation Measures**

1. Implement the Solid Waste Integrated Resources Plan to maximize source reduction and materials recovery and minimize the amount of solid waste requiring disposal with the goal of leading the City to achieve zero waste by 2025.

Implementing Agency	Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Plan implementation

2. Encourage and provide incentives for the processing and marketing of recyclable items.

Implementing Agency	Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Plan implementation

3. Accelerate on-going efforts to provide alternative solid waste treatment processes and the expansion of existing landfills and establishment of new sites.

Implementing Agency	Bureau of Sanitation
Enforcement and Monitoring Agency	Bureau of Sanitation
Monitoring Phase	Plan implementation

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## **5. Transportation**

### **Mitigation Measures**

1. Implement development review procedures to ensure that the applicable Mobility policies of the Hollywood Community Plan are applied and implemented by individual development projects when they are considered for approval in the plan area.

Implementing Agency	Dept. of Transportation and Dept of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

**The following “Further Recommendation” is not a mitigation measure and therefore not strictly required to be monitored; however, the City may choose to monitor this measures:** In order to provide an additional source of funding for transportation improvements, beyond the local and regional funds typically available to the City of Los Angeles, it is recommended that a nexus study be conducted to determine the transportation impact of development accommodated by the 2030 Proposed Plan, estimate the cost of implementing the transportation mitigation measures recommended by the Hollywood Community Plan Update, and develop a means of allocating the cost of such measures to individual development projects.

Implementing Agency	Dept. of Transportation and Dept of City Planning
Enforcement and Monitoring Agency	Dept. of Transportation and Dept of City Planning
Monitoring Phase	Plan implementation

## **6. Air Quality**

### **Mitigation Measures**

The proposed Hollywood Community Plan incorporates sustainable programs and policies that would help mitigate significant impacts on regional and local air quality. In addition to these programs and policies, the following additional Mitigation measures are recommended:

1. The City, as a condition of approval of all discretionary projects, shall require contractors building projects within the Hollywood CPA to:
  - i) Use properly tuned and maintained equipment. Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations
  - ii) Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalyts) to the extent they are readily available and feasible
  - iii) Use heavy duty diesel-fueled equipment that uses low NOx diesel fuel to the extent it is readily available and feasible
  - iv) Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible
  - v) Maintain construction equipment in good operating condition to minimize air pollutants.
  - vi) Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.
  - vii) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
  - viii) Provide dedicated turn lanes for movement of construction trucks and equipment on-and off-site.
  - ix) Reroute construction trucks away from congested streets or sensitive receptor areas.
  - x) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

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- xi) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
  - xii) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.
  - xiii) Construct or build with materials that do not require painting.
  - xiv) Require the use of pre-painted construction materials.
  - xv) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
  - xvi) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
    - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
    - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
    - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
    - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
    - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/implementation/soonprogram.htm>.
  - xvii) Other measures as applicable on a project by project basis and as may be recommended by SCAQMD on their web site or elsewhere: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

Implementing Agency  
Enforcement and Monitoring Agency  
Monitoring Phase

Dept. of City Planning, SCAQMD  
Dept. of Building and Safety  
Pre-construction



2. The City, as a condition of approval for all discretionary projects, shall require developers to implement applicable GHG reduction measures in project design and comply with regulatory targets.

Implementing Agency	Dept. of City Planning, SCAQMD
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-construction

3. In the event that future projects under the Community Plan cover areas greater than five acres, appropriate analysis and modeling would be required for CO, NOx, PM10 and PM2.5.

Implementing Agency	Dept. of City Planning, SCAQMD
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-construction

4. Require health risk assessments to be conducted for discretionary residential projects located within 500 feet of the 101 Freeway. Mitigation measures shall be required as necessary to reduce health risk (for indoor and outdoor uses) to an acceptable level. These health risk assessments shall be circulated to SCAQMD for review and comment.

Implementing Agency	Dept. of City Planning, SCAQMD
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-construction

5. In order to comply with the California Air Resources Board Air Quality and Land Use Handbook (June 2005) and achieve an acceptable interior air quality level for sensitive receptors, appropriate measures, shall be incorporated into project building design. The appropriate measures shall include one of the following methods:

- a. The project applicant shall retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with the California Air Resources Board and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents/occupants/users to stationary air quality pollutants prior to issuance of a demolition, grading, or building permit. The HRA shall be submitted to the Lead Agency for review and approval. The applicant or implementation agency shall implement the approved HRA recommendations, if any. If the HRA concludes that the air quality risks from nearby sources are at or below acceptable levels, then additional measures are not required.
- b. The applicant shall implement the following features that have been found to reduce the air quality risk to sensitive receptors and shall be included in the project construction plans. These shall be submitted to the Planning and Zoning Division and the Building Services Division for review and approval prior to the issuance of a demolition, grading, or building permit and ongoing.
  - c. Do not locate sensitive receptors near distribution center's entry and exit points.
  - d. Do not locate sensitive receptors in the same building as a perchloroethylene dry cleaning facility.
  - e. Maintain a 50' buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).
  - f. Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each individual residential unit, that meets the efficiency standard of the MERV 13. The HV system shall include the following features: Installation of a high efficiency filter and/or carbon filter-to-filter

- particulates and other chemical matter from entering the building. Either HEPA filters or ASHRAE 85% supply filters shall be used.
- g. Retain a qualified HV consultant or HERS rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources.
  - h. Maintain positive pressure within the building.
  - i. Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
  - j. Achieve a performance standard of at least 4 air exchanges per hour of recirculation
  - k. Achieve a performance standard of .25 air exchanges per hour of in unfiltered infiltration if the building is not positively pressurized.
  - l. Project applicant shall maintain, repair and/or replace HV system or prepare an Operation and Maintenance Manual for the HV system and the filter. The manual shall include the operating instructions and maintenance and replacement schedule. This manual shall be included in the CC&R's for residential projects and distributed to the building maintenance staff. In addition, the applicant shall prepare a separate Homeowners Manual. The manual shall contain the operating instructions and maintenance and replacement schedule for the HV system and the filters. It shall also include a disclosure to the buyers of the air quality analysis findings.

Implementing Agency	Dept. of City Planning, SCAQMD
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-construction

**7. Noise**

**Mitigation Measures**

- 1. Re-route truck traffic away from residential streets, if possible. If no alternatives are available, route truck traffic on streets with the fewest residences.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

- 2. Site equipment on construction lots as far away from noise-sensitive sites as possible.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

- 3. When construction activities are located in close proximity to noise-sensitive sites, construction noise barriers, such as temporary walls or piles of excavated material between activities and noise sensitive uses.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

- 4. Avoid use of impact pile drivers where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives where geological conditions permit their use. Use noise shrouds when necessary to reduce noise of pile drilling/driving.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

5. Use construction equipment with mufflers that comply with manufacturers' requirements.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

6. Consider potential vibration impacts to older (historic) buildings in Hollywood as part of the approval process.

Implementing Agency	Dept. of Building Safety
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

7. Commercial rooftop discretionary uses within 500 feet of residentially zoned areas shall be subject to noise analyses; mitigation shall be required to ensure that noise levels in residential areas will not result in a significant impact.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

8. For all newly proposed entertainment venues requiring discretionary approval, noise abatement plans shall be required as conditions of approval.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

**8. Geology and Soils**

The Proposed Plan incorporates programs and policies that help mitigate any significant adverse impact that could result from geological hazards. Adherence to all relevant plans, codes, and regulations with respect to design of individual projects would reduce project-specific and cumulative geologic impacts to a less than significant level. The proposed Hollywood Community Plan does not require mitigation measures as there are no potentially significant impacts.

**9. Cultural Resources**

**Mitigation Measures**

***A. Historic Resources***

1. Cultural Heritage Commission/Office of Historic Resources Building Permit Review of Historic-Cultural Monuments.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

2. Office of Historical Resources Building Permit Review of Properties on the National Register/California Register.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

3. Historic-Preservation Overlay Zones (HPOZ) Program.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of City Planning
Monitoring Phase	Plan implementation

4. SurveyLA.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of City Planning
Monitoring Phase	Plan implementation

5. Project-Specific CEQA Review by City.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

6. Floor Area Ratio (FAR) Incentive Areas Compliance with Secretary of the Interior's Standards.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

7. Cultural Heritage Commission/Office of Historic Resources Building Permit Review of the Hollywood Walk of Fame.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

8. Project-Specific CEQA Review by the City of projects along the Hollywood Walk of Fame.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building Safety
Monitoring Phase	Pre-construction

***B . Archaeological/Paleontological Resources***

9. As part of individual project CEQA review, the potential for impacts to archaeological and paleontological resources shall be evaluated and mitigation measures identified as appropriate. In the event any archaeological and/or paleontological resources are determined to be potentially present, as appropriate the City shall require the developer to retain an on-site qualified archaeologist and/or paleontologist with expertise in the area in order to monitor excavation in

previously undisturbed area and to assess the nature, extent and significance of any cultural materials that are encountered and to recommend appropriate methods to preserve any such resources. Said archaeologist and/or paleontologist will have the authority to put a hold on grading operations and mark, collect and evaluate any archaeological materials discovered during construction. Said archaeologist and/or paleontologist shall be provided a reasonable amount of time to prepare and implement protection measures coordinating with the City of Los Angeles Building and Safety Department.

Implementing Agency	Dept. of City Planning
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Construction

**10. Safety/Risk of Upset**

**Mitigation Measures**

1. As part of the discretionary review of individual projects, the City shall ensure that potential hazards are evaluated and mitigated consistent with State Law, City Code and recommendations of the City Building and Safety and Fire Departments, State Department of Toxic Substances Control, Regional Water Quality Control Board and South Coast Air Quality Management District, as appropriate. The evaluation of hazards shall consider all hazards that might be applicable to an individual project/site including but not limited to, methane gas, lead-based paint, asbestos, potential presence of hazardous materials associated with past use of a site, potential chemicals proposed to be used on-site, and emergency access.

Implementing Agency	Dept. of Building and Safety
Enforcement and Monitoring Agency	Dept. of Building and Safety; SCAQMD
Monitoring Phase	Pre-construction

2. As part of the review of individual discretionary projects, the City will ensure that appropriate mitigation measures are identified and required prior to approval of residential or public facility projects within 1,000 feet of a site known to be releasing substantial hazardous materials or wastes (as defined by the State of California), that could present a hazard to proposed development. These measures should address considerations of setbacks and buffers, barriers, risk of upset plans and safety evacuation plans.

Implementing Agency	Dept. of City Planning and Building and Safety
Enforcement and Monitoring Agency	Dept. of Building and Safety
Monitoring Phase	Pre-construction