

## People for Livable Communities

Why should the Hollywood Community Plan Update (HCP) be sent back to Planning for correction?

1) **Incorrect Population Figures/Projection:** The HCP is based on out-dated speculation not current facts. For example, the HCP says that population in Hollywood is increasing and expected to reach 250,000 by 2030, when a projection based on the U.S. Census shows Hollywood will have 190,000 or fewer people based on a steady population decline for the past 20 years. This is a 60,000 or over 30% discrepancy! Any plan based upon materially outdated or falsely assumed data needs to go back for a **major** renovation.

2) **Lack of DownZoning Alternative:** The HCP Update is misleading as the Draft Environmental Impact Report (DEIR) omitted the DownZoning Alternative and the law requires the Environmental Impact Report to consider **all reasonable** alternatives. Planning should study the alternative that corresponds with the actual population data. Decreasing population = downzoning. Growing population = upzoning.

3) **Infrastructure:** Infrastructure impacts have NO mitigation. By the Planning Department's own admission, there is '**no way**' to mitigate the impacts on emergency response or our infrastructure as a result of their forced density mission. (See Statement of Overriding Considerations) In fact the way to mitigate the adverse impacts would be 'downzoning' and not increasing density. If the plan moves in the direction of downzoning, the infrastructure and the true population can reach equilibrium.

4) **Unfunded Mitigation:** Unfunded mitigation means NO mitigation; The HCP refers to proposed mitigation as being 'unfunded'. By law, the term 'unfunded mitigation' is misleading as it does not imply a commitment to or availability of funds and resources to implement actual mitigation. If the mitigation is not funded, then it is NOT mitigation.

5) **Emergency Response Numbers:** The Draft Environmental Impact Report and Final Environmental Impact Report contain false data, e.g. fire and police capacity. The City Council used this false data (LA Fire Department Emergency Response Times) to reduce funding for Fire resources over a year ago. As it stands, emergency response components that do exist in the plan lack any reference to funding.

4) **General Plan inconsistency:** The General Plan is Growth Neutral while the HCP is not. According to Chapter 2, Growth and Capacity: ***"The General Plan Framework Element is population growth neutral: 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 loss of population.***” From what the Planners have indicated in the very few workshops offered in Hollywood, they need to promote growth in Hollywood in order to make sure there were people to use transit and presumably to live in the transit oriented development. But this turns the entire Framework on its head. It uses population growth as a way to make transit and transit oriented development work, when the purpose of transit is to meet the mobility needs of the populations, just like the purpose of housing is to meet their needs for shelter. The HCP needs to be growth neutral or it is inconsistent with the General Plan Framework Element. See:  
<http://cityplanning.lacity.org/cwd/framwk/chapters/02/02.htm>

5) **Mobility Plan/TIMP:** There is no accurate and up-to-date mobility plan (TIMP) included in this plan. The City's Planning Department has the funds to conduct a Transportation Study but it refuses to conduct the Study until after the HCP has been adopted. This is a major short sight in the plan and another reason why an approval should not be granted without understanding the full impact it will have on our infrastructure and lives.

6) **Notice:** There is the unresolved question whether 500-foot Notice of the HCP had to be sent to all people who reside in Hollywood or who own a business in the HCP area or only to some of the people (85,000 people received notice).

7) **Racial Bias:** Lack of Diverse Community inclusion can be interpreted as racial bias. The proposed update was not made available in the multiple languages used in Hollywood (Spanish, Armenian, Russian, Thai, Korean, Tagalog, etc.). Leaving these ethnic communities out of the information loop, many Hollywood residents and business owners have been excluded from this process thereby keeping them in the dark and preventing their participation in any legitimate democratic process pro or con.

People for Livable Communities  
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## Chamber of Commerce VS Hollywood Neighbors

The black text is the Chamber's creation. The red text is the response from People for Livable Communities. The red text rebuttal illustrates that there is no data to support the Chamber's claims. The facts contradict the Chamber. See Wendall Cox's article and "*If Smart Growth is So Smart, How Come No One Wants to Live There?*" 4-05-2012 by Ed Braddy attached to this document.

### Original Hollywood Community Plan

#### ***Response to Issues Raised by Opponents***

#### **Time to Move Forward**

- City Planning staff has worked for eight years on the proposed Hollywood Community Plan Update and held more than **150 meetings with the community**. There has been more than enough opportunity for input into the plan. It is time to move forward and to adopt the plan. 150 Meetings? This is greatly exaggerated. We need to see a list of each one.
- Because we have been working with an outdated community plan that is now 23 years old, developers have had to seek numerous variances on proposed projects that have opened them up to legal challenges. A new plan will clearly detail the City's expectations and help guide proposed developments so that they do not need to face lawsuits for seeking changes from archaic requirements. It is time to take action to give the community a plan with clear, updated guidelines for development. This Plan is to benefit developers – this is true.
- The plan provides predictability for ALL constituents – residents, small business owners, property owners, developers and the businesses we want to attract to Hollywood. The General Plan, the central organizing element of the Los Angeles General Plan, is Growth Neutral while the HCP Update is not. According to the General Plan Framework Element's Chapter 2, Growth and Capacity: "***The General Plan Framework Element is population growth neutral: 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 loss of population.***" In contrast to this document, the Department of City Planning, has argued that they are promoting a plan which fosters growth because new residents and new high density apartments are needed to make sure transit and transit oriented development will succeed.

But this turns the entire Framework on its head. It uses population growth to promote transit and transit oriented development work, when the purpose of transit is to meet the mobility needs of the populations, just like the purpose of housing is to meet their needs for shelter. The HCP needs to be growth neutral in order to be consistent with the General Plan Framework Element. See:

<http://cityplanning.lacity.org/cwd/framwkw/chapters/02/02.htm>

### **The Plan PROTECTS Residential Neighborhoods**

- The proposed plan is designed to protect Hollywood's residential neighborhoods. By surrounding them with density and high rise developments with no infrastructure support?
- The plan provides for enhanced protections for open spaces and maintains restrictions on hillside development. Again, no sound mobility plan in the flats where density is planned means people will be stuck in the hills with little chance for speedy emergency response and no way to evacuate in an emergency.
- The plan includes policies supporting additional open space and the creation of the Hollywood Central Park over the 101 Freeway. This park is a dangerous proposition and focuses park funding on one area to the exclusion of the remaining community devoid of park space. The park raises more questions than it answers and has not been evaluated for long-term safety.
- The plan directs development into the central area, adjacent to mass transit and away from residential neighborhoods. It preserves single-family residential neighborhoods, historic resources, theatre districts, post production, entertainment, and media district uses and directs future growth where there is the capacity and transportation infrastructure to support it. Hillside protections are strong, with new subdivision and slope density requirements. Again, no sound mobility plan in the flats where density is planned means people will be stuck in the hills with little chance for speedy emergency response and no way to evacuate in an emergency. Also, the "transportation infrastructure" cannot support the basic mobility needs of any populace. In other words, the subway doesn't serve the broader community – "you can't get there from here."

### **"Manhattanization" of Hollywood**

- Arguments that the Community Plan will lead to the "Manhattanization" of Hollywood don't match reality. Shifting of FAR to 6:1 in the "Hollywood

Corridor" of Vine, Hollywood, Cahuenga will allow for increased height with no basis in rationale to support this development. Facts about decreasing population point to DownZoning rather than UpZoning Hollywood. DownZoning the Hollywood Corridor and funding infrastructure improvements makes more sense and removes the Manhattanization argument.

- Under the current, 23-year-old zoning for central Hollywood, the allowed "Floor- Area Ratios" (FAR) range from 2:1 to a high of 6:1. Under the proposed new Community Plan, the allowed FARs range from 3:1 to a high of 6:1. The highest zoning that is allowed by right is 4.5:1. The majority of properties have a 3:1 FAR, with the 4.5:1 FAR close to transit stations. In order to get to the maximum allowed 6:1, a developer must go through the Planning Commission and City Council, with hearings to allow public input. If the zoning has changed to allow 6:1, the work for the community will be to fight against this. At present, the burden is on the developer to prove that the community NEEDS this kind of development. The community needs to have a level playing field with the developers and today this is a struggle. If the developers have a right to build at 6:1, the balance is in their favor to do so.
- By contrast, zoning in Downtown L.A. ranges from an FAR of 6:1 to a maximum of 13:1. When viewed in this context, it is easy to see how ridiculous the charges are that the new plan will result in Hollywood becoming another Manhattan. Hollywood becoming anything near Downtown L.A., is an insult to those who would like to maintain the Old Hollywood feel. It is also poor judgment to create another Downtown L.A. in a community like Hollywood without studying, supporting and funding infrastructure expansion and improvement. None of this is provided for within the Hollywood Community Plan Update.

## **Regional Center**

- Hollywood has been recognized as an important regional center of Los Angeles since at least the 1920s. The First National Bank Building, at the corner of Hollywood and Highland, was the tallest building in Los Angeles when it was built in 1927. Hollywood Blvd. was known as the great white way of the West during the 1930s and 40s. There is no special funding or consideration for improving the infrastructure along this "great white way" at present so the idea of building 6:1 developments in that corridor is unwise and will no doubt attract lawsuits from community groups to stop it.
- The Regional Center designation dates back to 1970, and was adopted in

the 1974 Centers Concept Plan. It is a little late now to be calling for Hollywood to be deleted as a regional center. Since its designation in 1974, there has been a tremendous investment in the infrastructure of Hollywood to assist in its regional center role. The infrastructure in this "Regional Center" is crumbling and so is the infrastructure in the small residential neighborhoods surrounding this "Regional Center" including the residential hillside neighborhoods. The "Regional Center" is not an island that can stand alone. The Hollywood area needs to have infrastructure monitoring conducted, funds secured, and improvements planned. This is not part of the current Hollywood Community Plan.

- Other than Century City, there is no other community in the City that makes more sense to be considered a regional center. The people who live in Hollywood do not agree that this should be a Regional Center. They feel that a more appropriate model than Century City or Downtown L.A., is Old Town Pasadena.

### **Census Data Importance**

- Arguments that because the 2010 census shows a decline in Hollywood's population, don't make sense, unless you are saying that we should not anticipate any growth in Hollywood or the region in the future. Before a plan can be created with density and FAR of 6:1, there needs to be proof that there somehow is going to be an influx of people coming into the Hollywood Community to live and work. There is no data to support this projection. Rather, data exists proving that the opposite is true.
- Of greater import is the question of how the new apartment buildings are leasing up that have been built in recent years in central Hollywood. In 2010, a total of 1,072 units were completed. As of March 2012, these were the occupancy rates for these complexes: 83%, 79%, 98%, 95%, 95%, 95%. (The one at 79% was the most recently completed.) These results show that the Hollywood market has been very healthy and that there is indeed demand to live in central Hollywood. Show us where these figures come from. The W Hotel has had problems with occupancy and has had to shift from condo to apartment status due to difficulty of getting buyers. The Los Angeles Business Journal reported that there is currently a 25% vacancy rate of commercial space.

### **Traffic/Jobs**

- Much of the traffic occurring in Hollywood derives from commuters traveling through Hollywood to get to other areas, and from people attending special events. The 2005 TIMP stated that the streets in

Hollywood cannot be widened. Many major streets are already at a level of service that warrants a grade of F. The two freeways that were originally planned to handle the east-west and north-south commuter traffic through Hollywood were never completed. Increased density is unmitigatable.

- To address traffic impacts, we must address the jobs/housing balance. There is no shortage of housing. Development does not provide local jobs. Any peripheral employment derived from development is gone when the development is complete.
- There are fewer jobs in Hollywood today than there were 25 years ago. It is important for us to attract jobs so residents aren't forced to commute outside of the community. Development does not provide local jobs. Any peripheral employment derived from development is gone when the development is complete.
- Like the rest of the country, the recession has hit Hollywood hard. We need more jobs, and we need more investment. The community plan update provides a blueprint for that growth in a prudent way, calling for increased density and development where it can be accommodated, so that we can continue to make progress in Hollywood without sacrificing the community's unique character. There is no shortage of commercial space. With a 25% current vacancy rate of commercial space and an 8.4% decrease in population in the last 20 years, no additional development is needed. The idea that an equal number of jobs and housing in Hollywood could resolve traffic issues assumes that people should or could be made to live near their employment. This goes against the idea of basic human liberty. According to the America Communities Survey of the US Census, 79% of Americans prefer detached housing away from commercial centers. Simply increasing the density of residential and commercial space does not alter the one to one ratio of persons to jobs or to consumer activity. Additionally, development does not provide local jobs. Any temporary employment derived from development is mostly performed by contractors and specialized workers who would not be living in the area and is gone when the development is completed. A 6:1 FAR sacrifices the "community's unique character".
- With excellent mass transit options, central Hollywood is the logical place for combined residential/commercial development. The mass transit options are not excellent. They fail to take people to multiple destinations. There are no comprehensive east/west subways and no plans for them. Hence the growing traffic issues on the surface streets in current Hollywood.

- The plan supports FAR (floor area ratio) incentives for new job-producing office and media development in central Hollywood. The jobs-housing balance cannot be achieved without commercial offices needed to support the modernization of the entertainment industry. The bulk of the entertainment industry has fled Hollywood due to the high cost of running a business here (business taxes). Office space will not lure them back in.
- The plan update will help create a sustainable community here in Hollywood where the car is no longer king, people have choices for getting around, and the streets are more inviting and walkable. Hollywood will always be car-centric. New York has a tight web of public transit, which Hollywood will never have.

### **Crime**

- The revitalization of Hollywood over the past 15 years has had a positive impact and has led to an impressive reduction in crime. For the last 10 years since 2000, overall crime has decreased 46 percent, and since 2003, there has been a decrease of 58.9-percent when compared to other LAPD bureaus. Examine the fact that there are fewer people in Hollywood since 2000, and the lower crime rate makes sense. If density is forced upon this small community, crime will increase to correspond with the greater population.

### **Quality of Life**

- The revitalization of Hollywood has been positive for the entire community – and especially for residents. Property values are up substantially, there are now safe and attractive places to dine and shop – such as the Arclight Cinemas, Trader Joe’s, Hollywood & Highland and Urban Outfitters. These amenities are good for this small community and should be encouraged. They are not evidence that more development is needed. This reinforces the point that businesses should serve the residential community’s interests and we welcome them but it is not an argument for additional density.
- New development in central Hollywood is attracting new, committed stakeholders to Hollywood. Of more than 1,500 housing units completed since 2010, rents (other than for affordable units) start at \$1,800 a month. The new units are bringing residents to the community with discretionary income to support a higher quality of life. Where does this data exist? If true, then it sounds like an effort to drive out lower income residents from Hollywood and to deplete the supply of affordable housing.



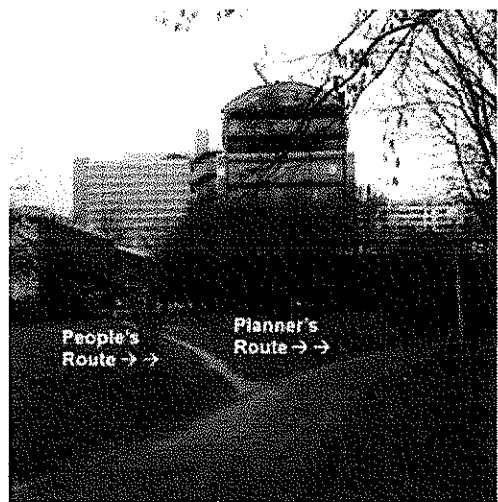
- The Plan aims to make Hollywood the most vibrant walkable community in Los Angeles – with policies that: preserve wider sidewalks, support comprehensive streetscape plans and boulevard improvement plans, and enhance protections of open space. Wider sidewalks are only possible when there is space to do that widening but there are historic and other established buildings that cannot be moved to provide these wide sidewalks. Few streets can enjoy this sidewalk widening so these are empty promises which, again, lack funding or responsible plans to make them happen.



## If Smart Growth is So Smart, How Come No One Wants to Live There?

04.05.2012

Ed Braddy



**CITY PLANNING AND POLITICS** - It's a given in our representative system that policies adopted into law should have popular support. However, there is a distinction to be made between adopting a policy consistent with what a majority of people want, and pushing a policy while making dubious claims that it harnesses "the will of the people."

The former is a valid exercise in democracy; the latter is a logical fallacy. [\[link\]](#) Smart Growth advocates are among the most effective practitioners of Argumentum ad Populum, urging everyone to get on the bandwagon of higher densities, compact mixed-uses, and transit orientation because all the "cool cities" are doing it. Smart Growth advocates also claim this is what people prefer, even if it is not how they currently live.

The two core features of Smart Growth land use — high densities and multi-family dwellings — are simply not preferred by most

Americans in most places, despite the trendy push for Livability, New Urbanism, Resilient Cities, Smart Codes, Traditional Neighborhood Design, Transit Oriented Developments or any other euphemistic, clever name currently in fashion.

### Survey Says!

In the internal data of the [2011 Community Preference Survey](#) commissioned by the National Association of Realtors, no specific question was asked about density, but 52 percent of respondents said, if given a choice, they would prefer to live in traditional suburbs, small towns or the rural countryside. Another 28 percent chose a suburban setting that allowed for some mixed uses (Question 5). Taken together, this shows an overwhelming preference for low densities. Only 8 percent of the respondents favored a central city environment.

As for vibrant urbanism, only 7 percent were "very interested" in living in a place "at the center of it all." Most people wanted to live "away from it all" (Question 17). An astonishing 87 percent said "privacy from neighbors" was important to them in deciding where to live. One can reasonably infer that a majority of this majority would favor low density places with separated uses rather than crowded, noisy mixed use locations that blur the line between public and private.

When presented with a range of housing choices, 80 percent preferred the "single-family detached house" (Question 6). Only eight percent chose an apartment or condominium. Furthermore, 61 percent preferred a place where "houses are built far apart on larger lots and you have to drive to get to schools, stores, and restaurants" over 37 percent who wanted a place where "houses are built close together on small lots and it is easy to walk to schools, stores and restaurants" (Question 8).

So -- absent the loaded terms and buzzwords that are central to Smart Growth -- a large majority of randomly selected people from across the country showed a strong preference for the land use pattern derisively referred to as "sprawl."

Yet the press release from the National Association of Realtors proclaimed that "Americans prefer smart growth communities." This is because on Question 13, respondents were given a description of two communities:

Community A, a subdivision of only single family homes with nothing around them. Not even sidewalks!

Community B: lots of amenities all “within a few blocks” of home. Of course, the description neglected to mention the population density and degree of residential stacking required to put all those dwellings in such close proximity to walkable retail. This was a significant omission, since the first housing option offered in Community B was “single family, detached,” on “various sized lots.”

Community B received 56 percent support.

So, with just one response to an unrealistic scenario, out of twenty answers that included many aversions to Smart Growth, the myth that people prefer Smart Growth was spread. The National League of Cities released a Municipal Action Guide to thousands of elected and appointed officials declaring the preference for Smart Growth, and the online network Planetizen, among others, uncritically helped spread the news.

Missing from the triumphalism was this important caveat in the 98-page analysis of the results by the consultants who conducted the survey:

“Ideally, most Americans would like to live in walkable communities where shops, restaurants, and local businesses are within an easy stroll from their homes and their jobs are a short commute away; as long as those communities can also provide privacy from neighbors and detached, single-family homes. If this ideal is not possible, most prioritize shorter commutes and single-family homes above other considerations.”

In addition to spinning the results of preference surveys, Smart Growthers also ignore them. Maryland is a case study in how to disregard what people want while claiming the opposite. In drafting a statewide growth management plan that anticipated “increased demand for housing, an aging population, and diverse communities,” Maryland officials ignored a robust 55+ Housing Preference Survey from Montgomery County that specifically addressed this concern.

The survey showed that most seniors planned to remain in their present homes upon retirement. Only 30 percent planned to move, and, of that group, only a small percentage would consider an apartment or condominium. This should have mattered to Maryland officials trying to gauge housing preferences for their senior population. Instead, the architects of PlanMaryland looked elsewhere to find studies that reinforced their assumptions.

There is an abundance of examples like these, and the key to understanding how they influence decision-makers lies in the conflation of specific amenities with the overarching concept of Smart Growth. For example, Todd Litman’s *Where We Want to Be*, published by the Victoria Transport Policy Institute, claims that “preference for smart growth is increasing due to demographic, economic and market trends such as aging population, rising future fuel prices, increasing traffic congestion, and increasing health and environmental concerns.”

Does this mean most seniors – such as those in Maryland – want to live in high density, mixed use, transit-oriented apartments even when they say they don’t? Hardly. Litman concedes that “most Americans prefer single-family homes,” but finds “a growing portion want neighborhood amenities associated with Smart Growth including accessibility, walkability, nearby services, and improved public transport.”

Those amenities are things like sidewalks, which evidently are now a Smart Growth invention, and shops that are close to (but not mixed into) residential areas. Litman’s clever construction – e.g., sidewalks equal walkability equal Smart Growth policy – is convincing to officials who mistakenly conclude that their constituents must want Smart Growth when, in fact, they do not.

*(Ed Braddy is the executive director of the American Dream Coalition, a non-profit organization promoting freedom, mobility and affordable homeownership. This article was posted first at [newgeography.com](http://newgeography.com))* Photo by W. Cox: Rail station in Evry, a suburb of Paris  
-cw

Tags: Smart Growth, high density, transportation

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# California Declares War on Suburbia

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Planners want to herd millions into densely packed urban corridors. It won't save the planet but will make traffic even worse.

By WENDELL COX

It's no secret that California's regulatory and tax climate is driving business investment to other states. California's high cost of living also is driving people away. Since 2000 more than 1.6 million people have fled, and my own research as well as that of others points to high housing prices as the principal factor.

The exodus is likely to accelerate. California has declared war on the most popular housing choice, the single family, detached home—all in the name of saving the planet.

Metropolitan area governments are adopting plans that would require most new housing to be built at 20 or more to the acre, which is at least five times the traditional quarter acre per house. State and regional planners also seek to radically restructure urban areas, forcing much of the new hyperdensity development into narrowly confined corridors.

Transportation consultant Wendell Cox on why California pols want to force people into denser urban housing.

In San Francisco and San Jose, for example, the Association of Bay Area Governments has proposed that only 3% of new housing built by 2035 would be allowed on or beyond the "urban fringe"—where current housing ends and the countryside begins. Over two-thirds of the housing for the projected two million new residents in these metro areas would be multifamily—that is, apartments and condo complexes—and concentrated along major thoroughfares such as Telegraph Avenue in the East Bay and El Camino Real on the Peninsula.

For its part, the Southern California Association of Governments wants to require more than one-half of the new housing in Los Angeles County and five other Southern California counties to be concentrated in dense, so-called transit villages, with much of it at an even higher 30 or more units per acre.

To understand how dramatic a change this would be, consider that if the planners have their way, 68% of new housing in Southern California by 2035 would be condos and apartment complexes. This contrasts with Census Bureau data showing that single-family, detached homes represented more than 80% of the increase in the region's housing stock between 2000 and 2010.

The campaign against suburbia is the result of laws passed in 2006 (the Global Warming Solutions Act) to reduce greenhouse gas emissions and in 2008 (the Sustainable Communities and Climate Protection Act) on urban planning. The latter law, as the Los Angeles Times aptly characterized it, was intended to "control suburban sprawl, build homes closer to downtown and reduce commuter driving, thus decreasing climate-changing greenhouse gas emissions." In short, to discourage automobile use.

If the planners have their way, the state's famously unaffordable housing could become even more unaffordable.

Condos: How California planners envision the future.

Over the past 40 years, median house prices have doubled relative to household incomes in the Golden State. Why? In 1998, Dartmouth economist William Fischel found that California's housing had been nearly as affordable as the rest of the nation until the more restrictive regulations, such as development moratoria, urban growth boundaries, and overly expensive impact fees came into effect starting in the 1970s. Other economic studies, such as by Stephen Malpezzi at the University of Wisconsin, also have documented the strong relationship between more intense land-use

The love affair urban planners have for a future ruled by mass transit will be obscenely expensive and would not reduce traffic congestion. In San Diego, for example, an expanded bus and rail transit system is planned to receive more than half of the \$48.4 billion in total highway and transit spending through 2050. Yet transit would increase its share of travel to a measly 4% from its current tiny 2%, according to data in the San Diego Association of Governments regional transportation plan. This slight increase in mass transit ridership would be swamped by higher traffic volumes.

Higher population densities in the future means greater traffic congestion, because additional households in the future will continue to use their cars for most trips. In the San Diego metropolitan area, where the average one-way work trip travel time is 28 minutes, only 14% of work and higher education locations could be reached within 30 minutes by transit in 2050. But 70% or more of such locations will continue to be accessible in 30 minutes by car.

Rather than protest the extravagance, California Attorney General Kamala D. Harris instead has sued San Diego because she thinks transit was not favored enough in the plan and thereby violates the legislative planning requirements enacted in 2006 and 2008. Her predecessor (Jerry Brown, who is now the governor) similarly sued San Bernardino County in 2007.

California's war on suburbia is unnecessary, even considering the state's lofty climate-change goals. For example, a 2007 report by McKinsey, co-sponsored by the Environmental Defense Fund and the Natural Resources Defense Council, concluded that substantial greenhouse gas emissions reductions could be achieved while "traveling the same mileage" and without denser urban housing. The report recommended cost-effective strategies such as improved vehicle economy, improving the carbon efficiency of residential and commercial buildings, upgrading coal-fired electricity plants, and converting more electricity production to natural gas.

Ali Modarres of the Edmund G. "Pat" Brown Institute of Public Affairs at California State University, Los Angeles has shown that a disproportionate share of migrating households are young. This is at least in part because it is better to raise children with backyards than on condominium balconies. A less affordable California, with less attractive housing, could disadvantage the state as much as its already destructive policies toward business.

Mr. Cox, a transportation consultant, served three terms on the Los Angeles County Transportation Commission under the late Mayor Tom Bradley.

A version of this article appeared April 7, 2012, on page A13 in some U.S. editions of The Wall Street Journal, with the headline: California Declares War on Suburbia.



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PLUM Committee  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012  
April 16, 2012

Re: Hollywood Community Plan  
CPC-2005-6082-CPU, CPC-1997-43-CPU

Dear Councilmembers:

Beachwood Canyon Neighborhood  
Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Bel Air Ridge Association  
Benedict Canyon Association  
Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Canyon Back Alliance  
Crests Neighborhood Assn.  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland Homeowners  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Laurel Canyon Assn.  
Lookout Mountain Alliance  
Los Feliz Improvement Assn.  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon Assn.  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon Assn.  
Oaks Homeowners Assn.  
Outpost Estates Homeowners  
Pacific Palisades Residents Assn.  
Residents of Beverly Glen  
Roscomare Valley Assn.  
Shadow Hills Property Owners  
Sherman Oaks HO Assn.  
Studio City Residents Assn.  
Sunset Hills Homeowners Assn.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
Whitley Heights Civic Assn.

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents thirty-eight homeowner and residents associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and the quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live. Therefore the Hillside Federation supports the Hollywood Community Plan.

The Federation is pleased with the inclusion of the Baseline Hillside Ordinance, the Slope Density Ordinance, both of which were developed with the assistance of the Federation, and the upcoming Ridgeline Protection Ordinance and Retaining Wall Ordinance. A great deal of community input was taken and many specific local requests were incorporated into the plan. There is much in the plan which is to be commended.

However, there is one issue that continues to be of concern to the Federation—the amount of densification that is planned along the transit corridors. Are the population projections upon which the densification is based accurate? If the population is declining, do we need more densification? Given that the city already has water restrictions, traffic is already at a standstill, and our emergency services are already stretched, can the city afford to increase density? We don't want developers building out-of-scale and excessive height projects now when there is no demand to justify it.

The Hillside Federation urges the City to reexamine the population projections and the proposed densification to see if it is really justified.

Sincerely,

*Marian Dodge*

Marian Dodge, President

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Whois : <http://whois.arin.net/rest/ip/207.200.116.11>

Comment:

Hollywood Dell Civic Association

P.O. Box 93094

Hollywood, CA 90093

[www.HollywoodDell.com](http://www.HollywoodDell.com)

April 17, 2012

Los Angeles Planning Commission

City Hall Council Chambers- Room 340

200 N. SPRING STREET, LOS ANGELES, CALIFORNIA 90012

Attention: [James.K.Williams@lacity.org](mailto:James.K.Williams@lacity.org), [sharon.gin@lacity.org](mailto:sharon.gin@lacity.org)

RE: CPC-2005-6082-CPU, CEQA: ENV-2005-2158-EIR

Related Case: CPC-1997-43-CPU, Council File 12-0303

Dear Commissioners,:

The Hollywood Dell Civic Association, a 501 (c) 4, representing a residential community of approximately 1,200 single family homes, condominiums and apartment units, located immediately north of the Hollywood Redevelopment Area ("HRA") and bounded by Franklin Avenue on the south, Vine Street on the east, Cahuenga Blvd. on the west and Cahuenga Terrace on the west, have major reservations regarding the Hollywood Community Plan ("HCP") presently before the Council for consideration.

We believe the plan, as presently written, draws conclusions from inaccurate data and proposes significant up-zoning that will have significant negative impact to local Hollywood infrastructure, traffic congestion, quality of life and potentially reduce residential values by allowing mega-projects of unlimited height to be developed east of Cahuenga Blvd. We believe the HCP be sent back to Planning for further consideration prior to any further consideration of the HCP by the Planning Commission.

Key areas we believe should be reconsidered:

- Height limits on future developments between Franklin Avenue and Sunset Boulevard, east of Cahuenga Boulevard. As presently written, the HCP could allow projects over 1-million square feet and building heights of 50-stories plus;

- Down-zoning was not considered by the Planning Department as an alternative in the HCP;
- Traffic mitigation measures are not required to be funded or installed prior to start of future project development;
- Infrastructure mitigations to accommodate future commercial and mixed use developments, while providing for adequate fire, life, safety and sewer services for existing residential communities north of Franklin were not addressed;
- Data used in population forecasting was dated and inconsistent with actual population growth in the HRA (see Census data from 2010);
- The HCP is in conflict with the terms of the General Plan which supports neutral growth while the HCP promotes excessive growth;

Sincerely,

Patti Negri  
 President  
 Hollywood Dell Civic Association

Cc: Michael J. LoGrande, Director  
 Eva Yuan-McDaniel, Deputy Director  
 Alan Bell, AICP ,Deputy Director  
 Ken Bernstein, AICP  
 Kevin Keller, AICP  
 Mary Richardson, Staff

Antonio R. Villaraigosa, Mayor  
 Tom LaBonge Council District 4  
 Eric Garcetti Council District 13  
 Paul Koretz Council District 5

Date: 4/17/12  
 Submitted in PLUM Committee  
 Council File No: 12-0303  
 Item No.: 3  
 Deputy: Comm from Public