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May 29, 2012

Los Angeles City Council
Hon. Herb Wesson, Council President
200 North Spring Street
Los Angeles, CA 90012

Re: Hollywood Community Plan and Hollywood Community Plan
Update Final EIR, EIR No. 2005-2158 (EIR), CPC No. 97-0043
(CPU), and related actions before the City Council

Dear Council President Wesson and Councilmembers:

These supplemental comments on the Hollywood Community Plan Update objections are submitted on behalf of the La Mirada Avenue Neighborhood Association of Hollywood.

The EIR for the Hollywood Community Plan is fatally defective on any one of numerous grounds that have previously been outlined, in detail, by this firm and numerous members of the public. They do not all need to be recounted here. I do, however, wish to respond to staff comments made at the PLUM meeting of May 8, 2012.

Planning staff, while indicting that it might look more closely at a down-zoning alternative, was generally dismissive of the idea. Staff noted that down-zoning "would achieve the goal of freezing neighborhood character, but the Plan's objectives are to accommodate a certain level of population growth, jobs and employment growth and vitality so that would be something that would not meet those projections that [the City has] been given by SCAG." "City Planner Responds to Public Input on Community Plan Update," Hollywood Patch, May 9, 2012 (<http://hollywood.patch.com/articles/city-planner-responds-to-public-concerns-on-community-plan-update>).

The problem with this analysis is that a down-zoning alternative can meet the one projection that the City has been given by SCAG that arguably is supported by substantial evidence.

The projection that staff is referring to in the Hollywood Patch article is the SCAG 2030 projection of 244,602 persons. This projection, though, no longer has substantial evidence to support it. That projection is based on a presumed existing population in

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2005 of 224,426 residents. That 2005 estimate also came from SCAG, derived from its 2004 Regional Transportation Plan. (See EIR, p.4.2-1). We now know that the 2005 figure is false. The correct figure, based on current census data, shows 198,228 people living in Hollywood in 2010. As the 2005 SCAG estimate is no longer valid, neither is the 2030 SCAG projection as it is based on that estimate.

This leaves the delta between the SCAG 2005 estimate and the SCAG 2030 estimate as the only SCAG projection with arguably any substantial evidence to support it. The difference between these two is 20,176 – the number of new residents expected to call Hollywood home during the plan horizon. When applied to the correct baseline, Hollywood will grow to 218,404 residents by 2030.¹ Given that the existing HCP provides for a reasonable expected population of 235,850 people, a down-zoning alternative can be accommodated in a manner that still accounts for the expected amount of population growth.

Very truly yours,


BRADLY S. TORGAN, AICP
FOR
THE SILVERSTEIN LAW FIRM

BST:jmr

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¹ This figure also provides a slight buffer since the SCAG growth delta is compressed from a 25 year plan horizon to a 20 year plan horizon.