

TO: City of Los Angeles  
FROM: HELP and CCLA  
RE: Mobility Plan 2035, Need to Study Population trends in Connection with Population Saturation, Carrying Capacity, and Data Chaos  
DATE: August 10, 2015

**1. The Need for the MP 2035 to Have Discussed Human Saturation Points for Various Parts of the City of Los Angeles**

Increases in population density do not follow a straight line. One may not assume that because Los Angeles had a significant population increase between 1980 and 2000, that the population will continue to increase at that rate. In fact, it is clear that a rapid increase invariably plateaus. Often, the increase becomes a decline. That is exactly what happened with Hollywood and there are sound factors from which to conclude that Los Angeles' population may decline.

As HELP and CCLA discussed in their May 24, 2015 comment, the population projection for the year 2035 is fatally flawed and it is based on wishful thinking aka Data Chaos. This comment points out some issues which MP 2035 had a duty to discuss concerning the City's future population

Population Saturation Point Indicates No More Growth:

People, especially politicians, become enthralled with the notion of increased population density, and they are reluctant to admit when the rate of increase has dramatically slowed or that population is likely to decrease.

While cost of social overhead, i.e. infrastructure, decreases as an area's population density increases, the population reaches a **saturation point**. After that point, other factors make increased population density a negative. Balkan Worlds: The First and Last Europe, by Traian Stoianovich, pp206-209

For example, when the population becomes too dense for emergency services, adding more population endangers the safety of everyone. In June

2013, The county Grand Jury found the City's paramedic responses times were sub-standard and they Angelenos were needlessly dying as a result. Copy of Grand Jury report is submitted herewith.

In fact, in April 2005, USA Today had done a study on responses times and found that Los Angeles's response times were seriously subpar. The Los Angeles Fire Departments's own medical director found that the City used misleading data to make its responses times see much better than they were in reality. In other words, Los Angeles has passed the saturation point for some vital services. Extreme traffic congestion, inability to find parking, excessively high meter costs for parking, extended commute times, are additional signs that Los Angeles has reached population saturation for certain parts of the City.

Adding more people makes response times slower. As has been admitted, adding Bike Lanes and removing vehicle lanes will impede emergency vehicles which will result in more needless deaths. The City refuses to gather this data.

When the City fails to gather pertinent data, then the Court may find that the MP 2035 is not supported by substantial evidence. Lack of evidence cannot be substantial evidence. When petitioners show the court that the City has keep itself and others in a state of conscious ignorance, it will not be able to carry the substantial evidence burden of proof.

#### Failure to Study Key Concepts Leads to Data Chaos:

Los Angeles has struggled with Data Chaos for at least 15 years. The DEIR is essentially worthless as it fails to gather data and discuss key concepts like population saturation, carrying capacity, morbidity and mortality rates as related to emergency responds times, population change near TODs, Virtual Presence, change in crimes rates near TODs, etc.

The result of exceeding the saturation point is that people leave the area in order to reduce the population density. Whether people leave an area with too dense a population is often a function of more favorable conditions elsewhere. For example Greece experienced significant emigration between the years 1912

and 1920 resulting in a reduced population density. A major factor in stopping the emigration was the United State's adopting a restrictive immigration policy. Balkan Worlds, p 206

Los Angeles has no control over Austin, Texas, the Carolinas, or even over San Bernardino. The US Constitution forbids any state from erecting barriers to intra-nation immigration. Thus, as the City of Los Angeles reaches its saturation point, many residents move away.

As Hollywoodians Encouraging Logical Planning [HELP] pointed out in 2005, areas of Hollywood which reached the saturation point would see an exodus of those who could afford to move, leaving "Default Tenants," i.e. those who could not afford to relocate to more desirable locations.<sup>1</sup> As the US Census established, between 2001 and 2010 as the population density in council district 13 in Hollywood was increasing and the quality of life was decreasing, an exodus occurred. Because the quality of life had decreased so greatly in the census tracks contiguous the Metro Stations and the Community Redevelopment Agency [CRA] projects, council district 13 ceased to have enough people to qualify as a legal council district.

The City has ignored the fact shown by the population decline in council district 13. The saturation points within an area can differ significantly.

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Different individuals have different tolerances. Thus, an entire neighborhood is not abandoned overnight, but the attrition due to over crowding occurs overtime. Often gross numbers can conceal what is happening. For example, the more affluent may move to be replaced by more transient families. The overall population number may remain the same for a while, but when "crime families" move into an area that can accelerate the population flight of the more stable families. Although the City has been systematically under reporting crime, the people know what was occurring and many responded by leaving, only to have their places taken by families with more mental instability and criminals. In a city that prefers Data Chaos, significant change can occur before officials take notice. The most notable example is that council district 13 deteriorated so badly between 2001 and 2010 that it ceased to qualify as a legal council district. MP 2035 has been presented to the citizens in a similar whirl of Data Chaos.

Council District 4, which has its southern border in Hollywood contiguous with Council District 13's northern border, gained population between 2001 and 2010. People who are familiar with the so-called Franklin-Dixon Line recognize the dramatic difference in quality of life in CD 13 vs CD 4.

Council District 13, (just south of Franklin Avenue), has a low percentage of homeowners; council district 4, (just north of Franklin Avenue), has a high percent of homeowners. CD 13 is most renters in apartments; CD 4 is mostly single family homes. CD 13 has a high population density; CD 4 has a much lower population density. CD 13 residents are dependent on very poor quality schools of the Los Angeles Unified school District, while a large number of families in CD 4 can afford private schools.

Mobility Plan 2035 ignores the concept of population saturation, and the reason it ignores the population saturation is that the areas where the City wants to impose Transit Oriented Districts are already at or beyond the saturation point. Efforts to maintain a decent quality of life when the saturation point has been reached are extraordinarily expensive and usually ineffective.

Century City is a prime example of what happens in Los Angeles when the population saturation point has been reached. The most famous example is the widening of the 405 Freeway into the Valley. This expense was completely unnecessary and was undertaken for one purpose, that is, the prompt up the property values of mega-real estate developers in and near Century City.

Going back to the 1915 Study of Street Traffic Conditions in the City of Los Angeles, the city has known that attempting to thwart the outward expansion of population and business would benefit only a few landowners to the detriment of everyone else. By attempting to concentrate business, primarily professionals such as lawyers, CPA's etc in Century City, Los Angeles created a nightmare for people living within a 2 miles radius.

The simple problem was that there was no feasible way to transport people into and out of Century City in an efficient manner. The fault was not the automobile. The fault rested with those planners who ignored simple math, that

constructing Century City called for a huge population density in such a small area that it was mathematically impossible to serve via car or via mass transit.

The advantage of autos is that they leave from people's driveways and people drive listening to their own music or talk radio in air conditioned comfort. The disadvantage of autos is that they are large and require a lot of space for travel, i.e. freeways and wide avenues and they require space for parking. Thus, there is a mathematical limit on the number of autos which can approach Century City because traffic nightmares occur.

The disadvantage of subways and light rail transit [LRT, which we use to include both subways and surface light rail] is multi-fold.

(1) As we knew 100 years ago, a LRT cannot serve a huge radiant (circular) geographic area like Los Angeles. The maximum radius from the center is roughly 5 miles, after which a LRT becomes increasingly useless.

(2) Century City draws from the San Fernando Valley as well as from the Basin. That means LRT cannot effectively serve a major population source for Century City. The result in unacceptable traffic congestion on the 405 Freeway and the exits near Century City.

(3) The LRT has to be within  $\frac{1}{2}$  mile of the origin and destination. That objective is mathematically unachievable as the homes are too widely dispersed in the Valley. The City ignores the fact that for LRT to be functional and cost effective both the point of origin and the point of destination have to be within  $\frac{1}{2}$  mile of a LRT stop. Thus, the City could have 5 LRT stops inside Century City, but those stops would do nothing to address the fact that the vast majority of the workers will live more than  $\frac{1}{2}$  mile from a LRT stop.

(4) Century City was designed for professionals which means that West Coast notion of class and entitlement play a big role in determining which mode of transportation one will select.

(5) Time is money for professionals. While it is true that time is money for all workers, for lawyers, CPA's, and other professionals, time has been more monetized than for others. Attorney bill by the hour. Between \$500 and \$650/hour is now common. The more time it takes to commute, the more costly the commute. LRT is always much slower than a car. That means taking a LRT can cost a professional and extra \$500 to \$650 per day. In one work week, LRT can cost an attorney between \$2,500.00 and \$3,250.00 in billable hours per week.

(6) There are also social policy issues of having LRT for the poor so that the wealthy will have less surface traffic for their Mercedes and BMWs. CEQA should be broad enough to discuss transportation plans which are designed to create second class citizens of the poor and middle class who will be relegated to mass transit so that the wealthy will have more room for the vehicles.

(7) TelePresence and Virtual Reality will significantly reduce the demand for TODs which exceed the population saturation point. MP 2035 ignores this change which technology is bringing to us. People see it constantly. The Jimmy Kimmel Show has a segment called The Wall where he has an entire wall of viewers who are virtually present in his studio. On the left, we see many smaller screens with the viewers at home and Jimmy then selects one to be on the huge wall monitor. Then, Jimmy interacts with that person before he selects another person to fill the huge wall monitor.

This technology exists for both home and office. One may note that Jimmy does not sit down during this segment. One of the studies which should be conducted is the amount of standing and movement for people who use Virtual Presence as opposed to people who are tied to a desk monitor or laptop.

One can imagine an ebb and flow of commuters for an excessively dense TOD like Century City with Virtual Presence. While Virtual Presence will cause professionals not to physically go to the office an 1801 Century Park East, the more professionals use Virtual Presence, the less traffic congestion which suggests that people who live closer to Century City may now find it easier to drive to the office.

MP 2035, however, ignores all the implications of Virtual Presence leaving the entire City clueless about its impact on the saturation point of human population density in TODs.

**2. The Need to Have Studied Carrying Capacity of the Entire Infrastructure**

The Mobility Plan 2035 ignores the concept of human population density and **carrying capacity of the area**. A rapid expansion of population levels off as the limits of the environment is reached. We have seen this phenomenon for both Los Angeles in general and in Hollywood in particular. After rapid growth, the rate of increase dramatically slows and then reverses itself resulting in an exodus.

The population pattern for the City of Los Angeles required the DEIR to discuss facts produced by the US Census. Los Angeles had the smallest population increase [97,801] between 2000 and 2010 of any decade since the turn of the last century, 1890 to 1900 [52,084].

**Population History of City of Los Angeles from 1890 - 2010.**

Year	Rank	Population	Pop Increase
1890	57	50,395	
1900	36	102,479	52,084
1910	17	319,198	216,719
1920	10	576,673	257,475
1930	5	1,238,048	661,375
1940	5	1,504,277	266,229
1950	4	1,970,358	466,081
1960	3	2,479,015	508,657
1970	3	2,816,061	337,046
1980	3	2,966,850	150,789
1990	2	3,485,398	518,548
2000	2	3,694,820	209,422
2010	2	3,792,621	97,801

The pattern for Hollywood increased the need to seriously study the City’s population density, the saturation point and the carrying capacity of the environment. None of these issues were discussed.

**Hollywood Population Fluctuations 1950 - 2010**

Year	Population	Increase	Decrease
1950	160,047		
1960	160,383	336	
1970	156,335		4,000
1980	181,002	24,667	
1990	213,858	32,856	
2000	210,824		3,034
2010	198,228		12,596

The court should note population trend for the City and for Hollywood from 1980 through 2010.

The City			Hollywood	
Year	population	Change	population	Change
1980	2,966,850	+150,789	181,002	+24,667
1990	3,485,398	+518,548	213,858	+32,856
2000	3,694,820	+209,422	210,824	- 3,034
2010	3,792, 621	+ 97,801	198,228	- 12,596

As the data shows, as Hollywood’s population slowed and then turned into a decline, the City’s population growth rate dramatically slower. This phenomenon requires study and some demographers have studied the situation. As HELP wrote in its May 24, 2015 submission on MP 2035, the Sol Price School of Public Policy at USC and *Manhattan Institute Civic Report, No. 71 September 2012, THE GREAT CALIFORNIA EXODUS: A Closer Look* showed that the population of neither the City nor of Hollywood had any fact based expectation of increasing.



When one also takes into account the data in *What Doesn't Tell About Sprawl* (multiple copies already provided to the City), Los Angeles is the nation's most densely populated urban area. When one looks at the distribution of population density within the City of Los Angeles and the various factors which contribute to an increasing and decreasing population, we see that in some areas of Los Angeles, we have exceeded the saturation point and people are leaving. Overall, the dramatic decrease in rate of increase shows that Los Angeles has to deal with population that has exceeded the saturation point but also that population densities are exceeding the carrying capacity.

The carrying capacity is more than transportation, but includes all the factors which contribute to the quality of life. While the quality of life for Los Feliz may be accepted, the exodus from Hollywood and Sunset boulevards near Western Avenue, about one mile away, shows that the quality of life is unacceptable to many of those people. Mobility Plan 2035 plans to transform the entire City into concentrations of TODs like Hollywood - Western and not into areas like Los Feliz.

Nowhere does the MP 2035 discuss the data which shows that the specious data on which MP 2035 is predicated results in goals and objectives which have proven very harmful to the quality of life. By falsifying the data, the City avoids studying this aspect of MP 2035.<sup>2</sup>

Although these problems with the MP 2035 were expressly brought to the City's attention, it has failed to provide any written response. The City's failure to discuss its misleading population data, its failure to explain the basis for its

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In face of governments' and private foundations' demographic analyses finding that both the State's and the City' population growth is decreasing, Mobility Plan 2035 posits a dramatic population increase. According to the US Census, in year 2010 we had 3,792,621 ppl. According to The Mobility Plan 2035, the City astoundingly had increase of 211,779 ppl in the next two years. That is an increase of about 105,890 pp per year. *Table 4.1-15, page 4.1-21, The Mobility Plan 2035 Transportation Section, HELP's May 24, 2015 submission on MP 2035.*

data being the opposite of other demographers, its failure to discuss the pertinent concepts of population saturation and carrying capacity, and its failure to discuss the causes and effects of the varying population densities makes the City's MP 2035 fatally defective. *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal.4th 105

Reliance on SCAG is misplaced. As was shown in the Hollywood Community Plan litigation, relying on population forecasts of SCAG is misplaced. In the year 2005, SCAG said that Hollywood had a population of 224,000 ppl making a population of 250,000 ppl in the years 2030 seem reasonable. Before the Hollywood Community Plan was adopted, however, the US 2010 Census came out and SCAG revised its 2005 Hollywood population to only 200,546 ppl. That was a drop of 24,000 pl in five years. That precipitous drop was likewise inaccurate. More reasonable projections done by HELP maintained that the data showed that the population drop had started in the early or mid 1990 (although the US census reported in ten year increments) and that as quality of life deteriorated in the CD 13 portion of Hollywood, the rate of emigration increased.

As most people involved with land use realize, SCAG is notoriously unreliable and has been repeatedly criticized for manufacturing data that developers and politicians desire. The court may not blindly accept predictions from any agency which has such a atrocious track record when far more reliable data is available.

### **3. Summary:**

The words fatally flawed data, wishful thinking, and even subverting the law are significant problems which the Courts should not overlook and judging from the City's losing track record in court on its CEQA case, the courts have been paying attention to these deficiencies.

### **4. Conclusion:**

Like the Hollywood Plan, the Millennium Project, the Target fiasco, the

City should admit that its MP 2035 is fatally flawed, it is based on incorrect data, unforgivable omissions, wishful thinking and stand a very high probability of being rejected by the courts.

The city should do the right thing and not wait for the courts to reject Mobility Plan 2035, but rather it should send it back to begin at square one.

Respectfully submitted,

Hollywoodians Encouraging Logical Planning [HELP]

Citizens Coalition Los Angeles [CCLA]

Monday, August 10, 2015