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VIA FACSIMILE TO THE CITY CLERK
(213-978-1027)

June 18, 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. Please ensure they are placed into the record of proceedings in this matter.

It is clear from the Hollywood Community Plan Second Addition to the Final EIR that the HCP Update attaches itself to a single mantra – the objective of the HCP Update is to provide for the growth projected to occur by 2030 according to the SCAG 2030 projection. The problem with that mantra, though, is that there is no substantial evidence to support the SCAG 2030 projection of 244,602 people.

The foundation of the SCAG 2030 projection was the SCAG 2005 estimate of 224,426 people. The 2010 census data, however, show only 198,228 people in the HCP area, blowing the SCAG 2005 estimate out of the water. Without the SCAG 2005 estimate as its foundation, the SCAG 2030 projection cannot stand.

Nevertheless, the Final EIR continues to assert that the 2005 SCAG projection is the correct baseline, FEIR 2nd Addition at p. 10, and implies it is appropriate to use because population in Hollywood has “fluctuated over the years.” FEIR 2nd Addition at p. 16. Not only is this position misleading, but it is contrary to evidence provided by the City in the EIR, and contrary to the City’s own CEQA thresholds.

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Fluctuation implies volatility. There has been nothing volatile about Hollywood's population. It has been declining steadily since at least 1990. The data presented by the City in the EIR show a population of 213,912 people in 1990, a population of 210,912 people in 2000, and a population of 198,228 in 2010. For the City to suggest that population in Hollywood spiked by 14,000 people between 2000 and 2005 and then plummeted by 26,000 people in the following five years defies logic and common sense. It also defies the City's own CEQA thresholds of significance which require recalibration of mid-decade estimates once census data become available.

Accept the reality for what it is: SCAG grossly overestimated population in 2005, and that necessarily impacts its population projection for 2030. If the purpose of the HCP Update is to accommodate an increase in population anticipated by 2030, then the HCP Update needs to be recalibrated to account for the difference between the SCAG 2005 estimate and the 2010 census data. See correspondence from The Silverstein Law Firm to Los Angeles City Council, May 29, 2012. Anything else is a growth-inducing violation of the General Plan Framework Element.

Use of the correct baseline significantly increases impacts in every area that uses population as a variable for gauging impacts, from transportation to wastewater to public safety. This means that the City's current document fails to properly disclose, analyze and mitigate the actual impacts.

Use of the correct population baseline also affects alternatives analysis in a significant way. Aside from the fact that the Draft EIR contained no alternatives whatsoever, itself a violation of CEQA previously addressed, the Final EIR rejected a downzoning alternative, suggested by numerous members of the public, as infeasible because it allegedly would not meet growth-related objectives. FEIR 2nd Addition at pp. 3-4. That justification for rejection, however, is as much a fiction as a 2005 population estimate of 224,426 people.

The difference between the SCAG 2005 estimate and the SCAG 2030 projection is 20,176 people. When that figure applied to the correct baseline — the 2010 census — 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 downzoning alternative can be accommodated in a manner that still accounts for the expected amount of population growth, as well as growth in housing and employment.

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.

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If the City wants to accelerate growth in Hollywood beyond that which is projected, then we should have that discussion. That discussion, though, needs to be open, transparent, and include a true discussion of alternatives. All of those are lacking here, making the current HCP Update legally unsupportable.

Very truly yours,


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FOR
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