

HOLLYWOOD COMMUNITY PLAN UPDATE – ALTERNATIVE VISION

June 19, 2012

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Submitted by:

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Glossary Note:

Alternative Vision refers to the outline of an alternative, resident-focused Hollywood Community Plan Update proposed by the East Hollywood Certified Neighborhood Council (EHCNC). In the view of local residents, the Alternative Vision is based on an approach to city planning that emphasizes high levels of review and a high level of public amenities.

Proposed Update refers to the version on the Hollywood Community Plan Update approved by the Los Angeles City Planning Commission in December 2011 and that, with minor revisions, will be considered by the Los Angeles City Council in early 2012 and will be submitted to the City Council on June 19, 2012. In the view of the East Hollywood Neighborhood Council (EHNC), the Proposed Update is based on an approach to city planning that relies of reduced levels of regulation and review and on low public amenities.

INTRODUCTION TO THE ALTERNATIVE VISION

This Alternative Vision for the Update to the Hollywood Community Plan is presented by the East Hollywood Neighborhood Council, based on its review of the Proposed Update prepared by the Los Angeles Department of City Planning, approved by the Los Angeles City Planning Commission, and to be voted for adoption by the Los Angeles City Council. Instead, the EHNC has developed the following vision of an alternative plan. It is presented here for a detailed review prior to its elaboration and prior to the City Council's adoption of the Update of the Hollywood Community Plan.

The vision underlying the alternative Community Plan Update is driven by quality of life issues for those who live, work, travel through, visit, or conduct business in Hollywood. The Alternative Vision's approach emphasizes local amenities and careful review of local trends and all private projects, in particular their compliance with LAMC zoning regulations and the requirements of the California Environmental Quality Act (CEQA). The Alternative Vision can also become a model for the other 34 Los Angeles Community Plans, all of which are scheduled for similar updates.

In terms of its research methodology, the Alternative Vision rejects the approach of the Department of City Planning used to prepare to the Proposed Update. As is carefully outlined in Appendix 6, this proposal inflates anticipated population growth in Hollywood by ignoring the 2010 census data, and then uses the resulting inflated population figures to justify major increases in locally permitted densities through zone changes, heigh district changes and General Plan amendments. These new zones would allow the construction of large, tall buildings, avoiding the careful zoning and environmental reviews that are now required of such buildings.

The Alternative Vision stands in sharp contrast to the Hollywood promoted by the commercial interests who will financially benefit from the city's Proposed Update. For them the Hollywood Community Plan Area is a potentially lucrative location for speculative private investment in quickly approved commercial real estate projects. It is this business model that drives the methodology, goals and policies, and programs of the Proposed Update to the Hollywood Community Plan. Furthermore, unless prevented, commercial investment agendas will guide the Community Plan Updates scheduled for LA's other 34 community plan areas in 2012 and in subsequent years. Based on the precedent set by the Proposed Update, the entire city could eventually be transformed into a permanent low amenity, low regulation "business-friendly" distopia.

In contrast, the East Hollywood Neighborhood Council's Alternative Vision for the Hollywood Community Plan is based on the purposes, intent, and methodology of the General Plan Framework Element (as required by the Los Angeles City Charter, Sections 556 and 558). This is why the Alternative Vision carefully builds on the five following features:

- 1) Current Census Data: The Proposed Plan will utilize 2010 census data and related population projections, in contrast to the Proposed Update, which relies on old census data and inflated population projections.
- 2) User Demand Data: The Proposed Update relies on the most recent municipal-level data on future user demand for public services and infrastructure in the Plan area, in contrast to the City's approach through the Proposed Update's Final Environmental Impact Report (FEIR). As befits a low amenity approach, the FEIR concludes that the commercial projects ushered in by the Update will overwhelm local public services and infrastructure, as well as air quality. These adverse outcomes are then dismissed through a Statement of Overriding Considerations to be adopted by the Los Angeles City Council. This statement argues that substantial transit use and employment will result from the Proposed Update and that these benefits offset the Plan's unmitigated environmental impacts.
- 3) Infrastructure: The Proposed Update is based on the most current data on Hollywood's public services and infrastructure, including maintenance levels and construction linked to secured funding between 2010 to 2030. This approach contrasts to the the Proposed Update's FEIR, which fails to analyze the sources and security of infrastructure funding and maintenance.

- 4) Buildout: The Proposed Plan will incorporate accurate calculations of the buildout capacity of Hollywood based on General Plan designations and adopted zoning ordinances in the Hollywood Community Plan area. This is in contrast to the Proposed Update, which offers no buildout calculations for private or publicly owned land, including existing categories, as well as proposed General Plan and zoning amendments.

- 5) Emergency Preparedness: The Proposed Plan will give careful consideration to emergency preparedness for the natural and man-made disasters likely to befall the Hollywood Community Plan area over the life-time of the Update, again in contrast to the Proposed Update, which fails to consider these critical issues.

PRINCIPLES OF THE ALTERNATIVE VISION

In general, the Alternative Vision must remedy five critical methodological flaws in the Proposed Update approved by the City Planning Commission. By correcting these flaws, presented in Appendix 5 (METHODODOLOGICAL FLAWS OF PROPOSED PLAN PREPARED BY THE DEPARTMENT OF CITY PLANNING AND APPROVED BY THE CITY PLANNING COMMISSION), the proposed Update intends to transform the Hollywood Community Plan Area into a high amenity, high regulatory area of Los Angeles.

The alternative vision is a not a detailed technical alternative to the Hollywood Community Plan Update, and this alternative was not evaluated in the Draft Environmental Impact Report that City Planning prepared for the Proposed Udate. The production of such an alternative document is beyond the scope of an unfunded community organization. Rather this document is a vision of what such as alternative plan should address and incorporate. It is based on many suggestions offered in public testimony to the Department of City Planning on the flaws and limitations of the Proposed Update, as well as from a focus group internally organized by People for Livable Communities Los Angeles. In addition, specific examples for implementing the Alternative Vision were provided in "Greening East Hollywood -- An Open Space Network," a graduate student project dated December 8, 2011 and prepared for the East Hollywood Neighborhood Council by UCLA graduate students Daisy Allen, Runlin Cai, Lars Carlson, Bradley Cleveland, Lu Lu, Jinghua Suo, and Xinfeng Wang.

- 1) Scale and Character: The Alternative Vision is centered on the maintenance of the current scale and character of commercial and residential buildings in Hollywood, including their use, height, and building mass. Instead of sky-scrapers, the focus of new development and redevelopment should be pedestrian-oriented low rise buildings, utilizing both sidewalks and alleys for movement and outdoor dining. A potential low and mid-rise model for Hollywood's future development is Old Pasadena, not the high-rise, automobile-centric, pedestrian-unfriendly model of Century City. Implementation would include:
 - Adoption of a Pedestrian Oriented District on Santa Monica Boulevard.
 - Adoption of a Pedestrian Oriented District on Western Avenue.
 - Redesigning alleys with porous pavers, landscaping, street furniture, and traffic calming features to reduce automobile use. A prototype of such an alley conversion would be Lyman, between Santa Monica Boulevard and Lexington. This alley make-over would include a stone or brick surface complementing the adjacent public library, as well as bollards to slow traffic, additional trees, signage limited automobile access, public art, additional lighting, and street furniture.
- 2) Preservation: Hollywood's future should be extensively based on historical preservation, with special attention to iconic buildings related to the entertainment industry, such as the Capitol Records and Cinerama Dome buildings.
- 3) Zoning: Without credible census data analyses that predict substantial population gains between 2010-2030 and without any evidence that the buildout of Hollywood's existing arrangement of legally adopted General Plan designations and zones, including Height Districts, are inadequate for any population scenario, the up-planning and up-zoning ordinances appended to the Proposed Update have been rejected.
 - Amendments to the LAMC to allow or encourage green (landscaped) and white roofs on commercial and residential structures.

An Alternative Matrix of Changes to Zones, Height Districts, and Plan Designations is presented in Appendix 3.

Local sub-areas with stable population would not have their General Plan designations and zones changed. In contrast, however, those Hollywood neighborhoods that have had appreciable population decline from 1990 to 2010 would be down-planned and down-zoned through the Alternative Vision's eventual implementation program. Similarly, sub-areas within 500 feet of freeways would also be down-zoned and down-planned whenever existing or proposed densities exceed public health standards.

Because the Alternative Vision would include a thorough annual monitoring program, any unintended consequences resulting from this down-planning and/or down-zoning, such as over-crowding, would be quickly flagged. Changes in policies, including their implementation through ordinances, administrative procedures for municipal programs operated by City departments, and the City of Los Angeles's annual budgeting process, would then quickly ensue.

- 4) Public Infrastructure and Services: The Alternative Vision requires careful attention to the capability of local public services and infrastructure to meet the needs of Hollywood's residents, employees, and visitors. For the life of the Alternative Vision capability would be determined by a detailed annual inventory of existing conditions, including funding, related to public infrastructure and services. The findings resulting from this annual monitoring program would then be used to modify the Update's policies and implementation programs. These modifications would be incorporated into the City of Los Angeles's Capital Improvement Program (CIP) in order to catalog, budget, and plan future municipal capital projects.

The Alternative Vision's long-term intention would be to maintain and upgrade all categories of public infrastructure and public services to ensure an improved quality of life for the residents, employees, customers, and visitors to Hollywood. The categories of public services and infrastructure that the monitoring program would assess, but not be limited to, include:

- Parks, including pocket parks and small neighborhood parks, with basic services, such as landscaping and bathrooms, as well as local resident-serving recreation programs included whenever possible. Some of these goals can be achieved as follows:
 - Converting school play grounds into joint-use parks.
 - Temporarily using vacant lots as pocket park and community gardens, including community gardens, dog parks, and community artistic and cultural events.
 - Reconfiguring parking lots to become mixed-use lots.
 - Reengineering of wide residential streets to incorporate small pocket parks and bike lanes. A prototype of such a pocket park could be located on Mariposa Avenue, near the 101 Freeway. In this area the road is wide enough to be diverted around two pocket parks where gated playgrounds could be located.

- Community gardens in public areas, as well as private areas offered to the City for temporary community gardens. Whenever possible, the City would offer local residents training in gardening, as well as assistance in planting, maintaining, and composting drought tolerant landscaping and gardens in front, side, and back yards.
- Sidewalks, including regular maintenance and repair of cracked, raised, and crumbled sections, as well as ADA required curb cuts for those with limited mobility or other special needs, such as shoppers with grocery carts, families with baby carriages, or residents who depend on walkers and wheelchairs for mobility.
- Urban forest and complimentary landscaping of public areas, including the planting of drought tolerant trees for parkways (i.e., planting strip between sidewalks and curbs), median strips, and other public and quasi-public areas. All landscaping should be planted with a long-term program of watering and related maintenance, either by City employees or through contracts with local community groups.
 - In-fill tree planting on parkways, median strips, playgrounds, and other portions of the public right-of-way.
- Safe bike lanes on appropriate streets, particularly secondary highways, based on the City of Los Angeles recently adopted citywide Bike Plan. All bike lanes should be painted, with appropriate signage. Based on monitoring and safety records, high volume or dangerous bike routes on public streets would be upgraded through signage, lighting, grade separations, and other safety mechanisms.
- All public utilities and related infrastructure, including street lighting, electricity and power lines, water, storm water and drains, waste water including sewers, solid waste, emergency services, street conditions, and libraries, would be monitored through an annual monitoring program. All findings would be used to modify scheduled maintenance programs, as well as construction projects included in the City's annually updated Capital Improvement Program in order to maintain service levels and to ensure public safety during emergencies. Wherever possible, improvements of existing systems, in particular the undergrounding of power and telecommunications lines, would be a high priority for reasons of both esthetics and public safety during emergencies.

- All regulated private utilities, in particular telecommunications and natural gas, would be addressed in the annual monitoring report. All shortcomings, especially those with health and safety implications related to natural and man-made emergencies, would be forward to the appropriate regulatory agencies and departments for implementation and follow-up.
 - Temporary use of vacant lots for community gardens and temporary art displays.
 - All public infrastructure and services operated by non-municipal public agencies, including K-12 education (LAUSD - Los Angeles Unified School District), colleges and universities (LACCD - Los Angeles Community College District, CSU - California State University system, UC - University of California sysem), transit (MTA/Metro - Los Angeles Metropolitan Transit Authority), and highways (Caltrans – California State Department of Transportation) would also be addressed in the annual monitoring report. All findings addressing quality of life and health and safety issues for these categories would be forwarded to the responsbile agencies, with follow-up in future monitoring reports. Particular examples of local improvements include the following:
 - Defortifying public school playgrounds to allow their use after normal school hours and transforming school playgrounds into joint-use parks.
 - Community access to school athletic fields.
 - Conversion of parking lots at Los Angeles City College to mixed use plazas relying on porous pavers, vendors, shaded seating, active play areas, drought resistant landscaping, and bioswales for rainwaer catchment.
 - Replacing asphalt at school recreation areas with athletic fields, restrooms, andbike facilities.
- 5) Future housing needs, as identified by the annual monitoring report of neighborhoods and income groups, should be met through the preservation of existing rent controlled housing, including consistent code enforcement of houses and apartments, in combination with the construction of future affordable housing. Market rate housing intended to attract new upper income residents to Hollywood is acceptable, can be built by-right with discretionary actions. It should not, however, be facililtated through grants, subsidized loans or infrasructure, fee waivers, zone changes, variances, or General Plan Amendments.

6. The mobility needs of Hollywood's residents, employees, shoppers, visitors, and those driving through, must be met by multi-modal transportation options. These options must be carefully linked to land use capacity. In addition to expanding such alternative transportation modes as transit, carpooling, vanpooling, telecommuting, and biking, no increases in planned or zoned density should be adopted without a demonstration of available transportation capacity as documented in environmental data. Examples of such capacity would be major intersections with A, B, or C levels of service, and busses and shuttles with available seats during rush hours.
 - Pedestrianization can be encouraged through such sidewalk improvements as curb cuts, tree plantings, landscaped bulbouts and media strips at corners, and landscaped traffic circles as a traffic calming device.
 - Madison Avenue could be pedestrianization demonstration project by reducing the width of traffic lanes, introducing bike lanes, and systematic tree planting.
7. Design Review of major projects will not only focus on continuity in scale and character with Hollywood's existing built environment, but signage will be minimized. This approach will not only apply to new projects, but thorough enforcement of LAMC sign regulations would also apply to existing projects. High profile signage, particularly supergraphics and billboards, would be highly restricted. A program to phase out these forms of signage and improve the appearance of Hollywood's commercial corridors would be included in the Alternative Vision.

IMPLEMENTATION OF THE ALTERNATIVE VISION

1. As identified in the previous discussion, a carefully prepared annual monitoring report examining all public infrastructure and service categories is the corner stone of the Alternative Vision. This report would carefully examine all findings in the Update's Draft and Final Environmental Impact Report. This approach will be able to confirm which infrastructure categories are overwhelmed by population growth, which are subject to ambient growth, such as drive through traffic, and which categories are able to meet increased user demand from existing residents, employees, or visitors. These reports will also carefully track the maintenance of existing infrastructure and the construction of new infrastructure, with special attention to those categories for which the FEIR indicated future funding is not secure.

2. Part of the implementation of the Alternative Vision will be the City of Los Angeles Capital Improvement Program (CIP). It will be revised and updated according to the policies, programs, and monitoring report. All categories of public infrastructure and services will be included in the CIP.
3. The City of Los Angeles, through the City Administrative Office (CAO) and the Office of the Mayor, proposes an annual budget to the City Council, which then reviews and adopts it, with periodic mid-course corrections. For Hollywood, and incrementally for the entire city, this budgeting process would be linked to the Alternative Vision and its Annual Monitoring Report. Budget priorities and allocations related to the implementation of the Alternative Plan would be accordingly modified.
4. An alternative matrix of changes to zones, height districts, and plan designations, is presented Appendix 1
5. In selected cases, the implementation program will include special zoning areaa, in particular on Pedestrian Oriented District on Santa Monica Boulevard.
6. Footnotes to the Community Plan Map requiring the approval of demolition permits to be contingent on an approved building permit for ther same site.

CREDENTIALS:

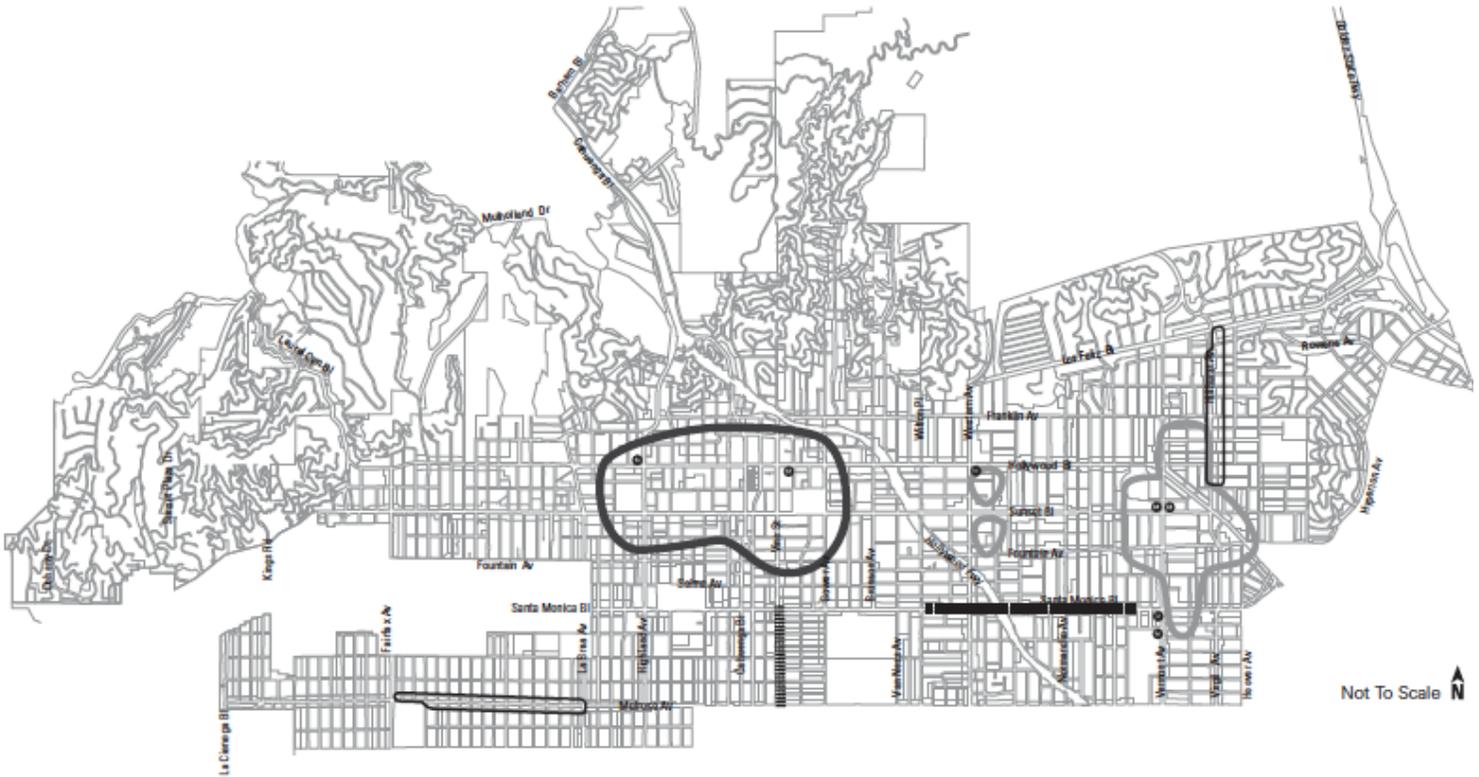
Richard Platkin is a city planning consultant and Adjunct Instructor at USC's Sol Price School of Public Policy. He was previously a city planner for the City of Los Angeles, during which time he worked on the General Plan Framework Element. As a result, he is familiar with the legal requirements, development, and content of Los Angeles's primary General Plan documents.

The Hollywood Community Plan is part of the Land Use Element of the General Plan. This means it is fully subject to State of California planning codes and administrative guidelines. The update must not only be consistent with the General Plan, but also be timely and comprehensive. Based on my knowledge and experience, the proposed update and its attached ordinances do not meet any of these legal and administrative criteria. The purpose of the East Hollywood Neighborhood Council's Alternative Vision is to initiate a Community Plan Update built on a community outlook and consistent with these State of California planning codes and guidelines.

Appendix 2: GENERAL PLAN FRAMEWORK PROPOSED CENTERS IN HOLLYWOOD

Legend:

-  Regional Center
-  Community Center
-  Neighborhood District
-  Mixed-Use Boulevard



**Existing General Plan Framework Map
Hollywood Community Plan**

Prepared by City of Los Angeles Planning Department • Graphics Services Section • November 2011 • 119

Appendix 3: MATRIX OF CHANGES TO ZONES, HEIGHT DISTRICTS, AND PLAN DESIGNATIONS

Location	Existing Zoning	Proposed Zoning	Rationale for Change
500 feet on either side of the 101 Freeway	R4, R5	RD1.5-1XL or lower	Public health concerns over air quality and disease.
Hollywood Redevelopment Project Area, between Vine Street and Serrano Avenue	R3, R4, R5	RD1.5XL	- Dissolution of Community Redevelopment Agency. - Lack of supportive infrastructure and services.
Area between Melrose Avenue, Gower Street, and Santa Monica Boulevard	R3-1XL, R4	RD1.5-1XL	Commercial uses permitted by current zoning are not compatible with existing community.
Virgil between Fountain Avenue and Santa Monica Boulevard	R4	R2	Reverse land use changes implemented through SNAP to up-zone these areas.
Santa Monica Boulevard Corridor	C2	All zones restricted to Height District 1XL, with conditions	Creation of Pedestrian Oriented District with 30 feet height restrictions, as proposed in Appendix 4. Transitional height differences with adjacent properties restricted to a maximum of 15 feet.
Western Avenue Corridor		All zones restricted to Height District 1XL, with conditions	Creation of Pedestrian Oriented District with 30 feet height restrictions. Transitional height differences with adjacent properties restricted to a maximum of 15 feet.
Hillside areas in and near Beachwood Canyon	RD1.5, RD2, RD4, R2, R3	R1, [Q]R2	Restrict development to two single-family homes or one duplex per lot.

Appendix 4: PEDESTRIAN ORIENTED DISTRICT ON SANTA MONICA BOULEVARD

December 21, 2011

Dear Councilmember Garcetti and Councilmember Reyes;

Over the past several months, the Route 66 Task Force has been in correspondence with staff overseeing the Hollywood Community Plan, Kevin Keller and Mary Richardson. Correspondence includes e-mail and meetings. On several occasions, the Route 66 Task Force proposed the establishment of a Pedestrian Overlay District (P.O.D.) along Santa Monica Blvd. between the Hollywood (101) Freeway and Hoover Avenue, to preserve the flow of pedestrian traffic and require façade improvements to help protect the historical significance of Route 66 in East Hollywood. West Hollywood has capitalized on this very same issue.

Therefore it is imperative to implement an overlay zone within the proposed Hollywood Community Plan to preserve the character of the street and buildings.

Santa Monica Blvd. in East Hollywood is served by a Metro Rail Station located on the southwest corner of Santa Monica Blvd. and Vermont Ave. as well as twenty (20) Metro bus stops which contribute to the large pedestrian flow within the corridor. Therefore, a P.O.D. designation would protect and enhance the existing pedestrian experience. Although the Hollywood Planners expressed strong support and proposed wording in the Hollywood Plan to implement building design and “walkability”, such “loosely-written” wording will have no effect. As in the past, wording has been placed in the plan to promote and preserve neighborhood character but has always failed to achieve those objectives. The proposed wording in the proposed Hollywood Plan is very general and will not have any impact to preserve “walkability” and neighborhood character.

According to the current Planning Code [Sec. 13.07 (B) (1)(2)], a P.O.D. requires that contiguous parcels be separated by streets and alleyways. This is typical for Santa Monica Blvd. In addition, at least two of the following criteria must be met:

- a. The street must have a variety of commercial uses,
- b. A majority of the buildings along the street must have a similar size and architectural design with windows and building interiors that enhance “pedestrian atmosphere”,
- c. The street must have street furniture, outdoor restaurants, and open-air sales, which are integrated with public sidewalks.

Santa Monica Blvd. satisfies criteria “a” and “b” as follows:

- 1) Santa Monica Blvd. has a commercial corridor (Type II Hwy) with a variety of commercial uses. This is apparent with the numerous commercial structures.
- 2) The buildings have good fenestration with windows faced adjacent to the public’s right of way. Most commercial businesses do create a “pedestrian atmosphere” due to easy accessibility of foot traffic to the interior of the buildings.

The current Planning Code specifies that a P.O.D. can only be applied to lots having the following zoning designation: CR, C1, C1.5, C2, C4, and C5. Properties location along Santa Monica Blvd. are zoned “C2” and therefore satisfy this P.O.D. requirement.

According to the P.O.D. requirements (copy attached to this letter), the following criteria must also be met:

- a. At least 75% of a building’s frontage on ground level must have entrances for pedestrians and windows that permit viewing of interior retail, office, and lobby areas,
- b. Any parking area adjoining a Pedestrian Oriented Street must have a 3.5 ft. block wall separating the right of way from the parking area.
- c. Building height not to exceed 40 feet.

Santa Monica Blvd. contains few strip shopping centers, built in the 1980’s with 3.5 ft. block walls separating the parking area from adjoining pedestrian right of ways. In addition, most buildings are single-story, have large, pane windows that allow pedestrians to view retail and/or office areas. Although there are buildings exceeding the 40-foot height limit, such buildings would be legal and nonconforming which is typical for most neighborhoods within the city of Los Angeles. The preceding requirements are therefore also satisfied with the existing configuration of the buildings within the corridor.

As required by the planning ordinance, a P.O.D. should include neighborhood retail and services. Santa Monica Blvd. currently has a wide variety of retail and neighborhood services as follows:

- a. Major supermarket (Jon’s market)
- b. Major bank (Kaiser Federal)
- c. Major drug store (Rite Aid)
- d. Barber shops
- e. Numerous restaurants
- f. Bakeries
- g. Insurance and real estate services
- h. Medical supplies
- i. Dental and medical offices
- j. The Cahuenga Library
- k. Immaculate Heart of St. Mary Church
- l. Two L.A.U.S. D. schools (Kingsley and Ramona elementary schools)

- m. Photographic studio and supplies
- n. Optician
- o. Locksmith
- p. Dry cleaner and laundromats
- q. Copying services
- r. "Mom and Pop" grocery stores and businesses

The Route 66 Task Force is working diligently in restoring Santa Monica Blvd. (Historic Route 66) in East Hollywood. It was recently awarded a \$3,000 maintenance grant by the Los Angeles Neighborhood Initiative (LANI). Matching funds were allocated by the East Hollywood Neighborhood Council for "Route 66" signage and additional cleanups. LANI has agreed to write a Transportation Planning grant for March 2012. Metro has partnered with the Task Force for maintaining the bus stops within the corridor. U.C.L.A. urban design students have presented design interventions for Route 66. This revitalization project is scheduled to proceed irrespective of any zoning change proposed by the Hollywood Community Plan. Therefore it is important to establish a Pedestrian Overlay District to assist in preserving the history of the corridor.

Cordially,

David Bell
East Hollywood Neighborhood Council, President.

Armen Makasjian
Route 66 Task Force, Chairman

Appendix 5: GENERAL PLAN FRAMEWORK POLICIES RELEVANT TO THE UPDATE

PUBLIC INFRASTRUCTURE AND PUBLIC SERVICES:

General Plan Framework Element, Chapter 9: 2. *How will the City identify where, when, and how many improvements are needed for infrastructure and public service systems?*

“Los Angeles needs consistent information concerning its infrastructure and public service systems, for effective capital investing. The City therefore needs to maintain up-to-date inventories of all its systems; computer models capable of evaluating the impacts of proposed projects on City-owned infrastructure; regular forecasts of each infrastructure system's needs, which can be used to guide capital improvement decisions; trigger mechanisms that can warn decision makers when and where future needs will occur; and reporting systems that enable the City to update its models. All of this information should be compiled in a Annual Report on Growth and Infrastructure, which will provide City staff, the City Council, and service providers with information that can facilitate the programming and funding of improvements or making decisions when to take other actions.”

PARKS: General Plan Framework Goal 9L Regarding Parks and Recreation: Sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation.

URBAN FOREST: General Plan Framework Element Goal 9 regarding the Urban Forest: *A sustainable urban forest that contributes to overall quality of life.*

Objective 9.41: Ensure that the elements of urban forestry are included in planning and programming of infrastructure projects which involve modification.

PUBLIC UTILITIES AND RELATED INFRASTRUCTURE:

General Plan Framework Element Goal 9P regarding Street Lighting: Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building facade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.

General Plan Framework Element Goal 9M regarding Power: A supply of electricity that is adequate to meet the needs of Los Angeles Department of Water and Power electric customers located within Los Angeles.

Objective 9.26: Monitor and forecast the electricity power needs of Los Angeles' residents, industries, and businesses.

General Plan Framework Goal 9D Regarding Solid Waste: An integrated solid waste

management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal.

General Plan Framework Element Goal 9C regarding Water Supply:

Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.

Objective 9.8: Monitor and forecast water demand based upon actual and predicted growth.

General Plan Framework Element Goal 9B regarding Stormwater: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

General Plan Framework Element Goal 9A regarding Wastewater: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

General Plan Framework Objective 9.15 regarding Emergency Services:

Provide for adequate public safety in emergency situations.

General Plan Framework Element Goal 9J regarding Fire Services: Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.

General Plan Framework Element Object Objective 9.20 regarding Libraries: Adopt a citywide library service standard by the year 2000.

PRIVATE TELECOMMUNICATIONS: General Plan Framework Element Objective 9.34 regarding Private Telecommunications: Maintain the City's authority to regulate telecommunications in such a way as to ensure and safeguard the public interest.

PUBLIC EDUCATION: General Plan Framework Element Goal 9N regarding Public Education: Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.

APPENDIX 6: METHODOLOGICAL FLAWS OF PROPOSED PLAN PREPARED BY THE DEPARTMENT OF CITY PLANNING AND APPROVED BY THE CITY PLANNING COMMISSION

FLAW 1) IMPROPER SEQUENCING: To meet the State of California requirements of General Plan timeliness and comprehensiveness, an accurate update of a locally focused Community Plan must be based on a city's General Plan, or in the case of Los Angeles, the citywide General Plan Framework Element, adopted in 1996. This document, the backbone of the Los Angeles General Plan, should be totally revised and updated based on current demographic and infrastructure data. Only when this essential and overdue planning process is completed, should the General Plan's Land Use element, Los Angeles's 35 local Community Plans, including Hollywood, be updated, based on the same demographic and infrastructure data bases utilized to update the General Plan Framework Element. But, at this point, to implement an outdated General Plan – which essentially expired in 2010 -- at the local level, much less with different base and horizon years, defies both State of California planning guidelines, professional standards, and common sense.

After all, changes in local conditions are part of a mosaic, which when completed, must replicate the most current and accurate version of the citywide General Plan. If either is out-of-date, this is impossible, and there is no way to locate, on a citywide basis, the locations mostly like to have the best combination of likely population growth with sufficient zoning and secured funding for adequate infrastructure capacity and public services.

This is the reason why California cities are required to have General Plans prior to local plans and local implementation ordinances.

If at all possible, the Alternate Vision would only be finalized when the Update of the General Plan Framework Element was prepared and adopted.

FLAW 2) FAILURE TO BE CONSISTENT WITH THE GENERAL PLAN FRAMEWORK ELEMENT: To comply with State of California planning codes and Los Angeles City Charter requirements, the Update of the Hollywood Community Plan must be consistent with the General Plan Framework Element. Consistency between these plans is, therefore, required and unavoidable. This is clearly spelled out in Los Angeles City Charter Sections 556 and 558.

 **Los Angeles City Charter Section 556. General Plan Compliance.**

When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

 **Los Angeles City Charter Section 558. Procedure for Adoption, Amendment or Repeal of Certain Ordinances, Orders and Resolutions.**

(a) The requirements of this section shall apply to the adoption, amendment or repeal of ordinances, orders or resolutions by the Council concerning:

- (1) the creation or change of any zones or districts for the purpose of regulating the use of land;
- (2) zoning or other land use regulations concerning permissible uses, height, density, bulk, location or use of buildings or structures, size of yards, open space, setbacks, building line requirements, and other similar requirements, including specific plan ordinances;
- (3) private street regulations;
- (4) public projects.

Nevertheless, despite this City Charter requirement, the Proposed Update turns the General Plan Framework Element on its head. Even though the Framework is explicitly growth neutral, the Proposed Update's implementation program of extensive up-zoning and up-planning is growth inducing and unabashedly presented as so. Its purpose is to promote large real estate projects that are claimed to meet secondary Framework goals, in particular transit use and housing. This is an approach that mocks LA's growth neutral General Plan Framework Element and in no way is consistent with its purposes, intent, and provisions.

According to the General Plan, the purpose of transit is to meet the mobility needs of the public, at present and during the life of the plan, for the Framework from 1990 to 2010, and for the Proposed Update, between 2005 and 2030. Instead the Proposed Update offers a zoning and planning program to dramatically increase density in Hollywood with the express purpose of locating more people near transit lines, to, presumably, increase transit ridership. This approach clearly conflicts with the intent and purposes of the General Plan. Based on its growth neutral approach, transit should serve real and likely mobility needs. It should not be used as a pretext for real estate speculators to build large new building in profitable locations that happen to be near subway stations and bus stops.

In the case of housing, the arguments for increasing density through zone changes and General Plan amendments in order to meet General Plan Framework Element goals is even flimsier and more contradictory. The rationale is that Hollywood will have a population boom during the 20-year life of the plan, and new housing is necessary to meet the demands of that future population. This is in stark contrast to reality, in which existing market rate housing in Hollywood continues to have high vacancy rates. The construction of even more market rate housing – with a few units set aside for low-income tenants -- is intended lure people to the community. This housing is not being constructed to meet the unmet housing needs of existing residents, which only applies to low-income individuals and families priced out of market housing. Instead, the purpose is to attract new, better off tenants into the new, by-right apartment and condo buildings encouraged by the Proposed Update and permitted by its extensive zoning ordinances and General Plan amendments.

FLAW 3) THE PROPOSED UPDATED FAILED TO CALCULATE BUILD-OUT:

The Los Angeles City Charter, Section 556 and 558, excerpted above, requires that all plan amendments and zone changes must be consistent with the City’s General Plan, even if its horizon year has already been reached. This translates into consistency with the methodology and policies of the General Plan Framework Element, despite the weakness of its data.

The General Plan Framework Element was adopted in 1995-6 and is clearly growth neutral, based on the finding that existing General Plan designations and existing zones could support a citywide population in Los Angeles of 8 million people.

This theme is repeated throughout the Framework, such as in: _____

This objective of growth neutrality means that the city’s population could be doubled without any increase in underlying densities. What is required, instead, is the steady, upgrading of public infrastructure and public services to meet the changing needs of this growing population. In this approach, zoning, which is already sufficient for all growth scenarios, is not the critical variable. Instead, infrastructure and services are critical because of increases in user demand resulting from both local population growth, as well as growing number of employees, visitors, and pass through traffic in Hollywood.

In rare cases, however, where population growth has exceeded locally permitted zoned capacities, the Framework would allow local increases in density through Zone Changes and, when necessary, also General Plan Amendments. For these legislative actions to occur, the applicant, whether the City or a private party, would need to demonstrate a minimum of three thresholds:

1. The build out capacity of a local area based on the full utilization of adopted zones and General Plan land use designations has been reached.
2. The local area's population is overcrowded, and there is no more remaining private land that could be developed to meet their needs for housing and employment.
3. The local area has and will continue to have sufficient, carefully monitored public infrastructure and public services to meet the housing and employment needs of the current and anticipated population.

Despite this clear requirement, the Proposed Update's Final Environmental Impact Report (FEIR) does not present a planning rationale for the Proposed Update's 105 pages of up-planning, up-zoning, and changes in Height Districts, consistent with the "growth neutrality" theme of the General Plan Framework Element. Los Angeles, according to the General Plan Framework, has enormous untapped capacity for population and housing growth based on the legally adopted plan designations and zones that existed when the Framework was prepared and adopted in the mid-1990s. Since then, Hollywood has modest increases in zoned capacity through discretionary actions. To exceed these expanded local densities in the Hollywood Community Plan area, the Department of City Planning would, therefore, need to present a clear demonstration of documented increases in population growth and housing demand that have exceeded Hollywood's expanded build-out capacity.

This is a substantial requirement; yet the Proposed Update does not present a calculation or an analysis of the remaining build out capacity of the privately zoned parcels in the Hollywood Community Plan area. It also fails to demonstrate that these private parcels do not have enough undeveloped capacity to meet the future housing and employment needs of the population they project by 2030 in Hollywood.

This is the exact approach of the General Plan Framework Element, and for the Proposed Plan to be consistent with the Framework, which is required by the Los Angeles City Charter, it must follow the Framework's methodology. This is not an optional requirement. Until the Charter is amended, it is mandatory.

FLAW 4) VIOLATION OF TIMELY REQUIREMENT OF STATE OF CALIFORNIA

GENERAL PLAN GUIDELINES: The Proposed Update of the Hollywood Community Plan ignores 2010 census data, and, instead, is based on outdated census data from previous decades. As a result, it does not meet the State of California's legal requirement that all planning documents be timely. California State planning laws and guidelines require General Plans, including their land use elements (e.g., the Hollywood Community Plan) to be current and internally consistent among their required and optional elements. In this case the General Plan Framework Element was based on 1990 census data. This data, in turn, was extrapolated to the Framework's 2010 horizon year. When these forecasts

were compared to real 2010 data, they were substantially higher, by about 12 percent or 400,000 people. The Update of the Hollywood Community Plan is supposed to apply the Framework to local communities, but it is based on year 2000 census data, augmented by a 2005 “guestimate,” and then extended to the year 2030 based on long-term trend data rooted in LA’s boom decades of the 1970s and 1980s.

The two plans – the General Plan Framework Element and the Hollywood Community Plan Update -- are not only inconsistent with each other, but neither is based on current census data. The new 2010 census data has been available for over one year and should have been used for all plan reviews and updates, including the General Plan Framework Element, the General Plan Land Use Element (i.e., Los Angeles’s 35 Community Plans, including Hollywood), and for related implementation ordinances. It also should have been used for long neglected General Plan monitoring of the demographic and infrastructure trends that shape the General Plan.

If 2010 census data had been used for the Hollywood Community Plan, including its DEIR and FEIR, they would have demonstrated that Hollywood had a serious population decline from 2000 to 2010 of about 15,000 people, on top of a slightly declining population between 1990-2000. This means that the Framework’s original projects, as well as the 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 preparing a Community Plan Update with a horizon year of 2030.

Had more realistic trend data, based on the past two stagnant decades, been used to update both the Framework and the Hollywood Community Plan, there would have been no extravagant claims of burgeoning population growth in Hollywood. At best, there would be extremely modest growth, and at worse, the significant population decline from 1990 to 2010 would be extended for twenty more years, resulting in major population loss, not gain, in Hollywood.

Nevertheless, even if these outdated and inflated population numbers were accepted for a planning exercise, such as a DEIR scenario, there is absolutely no evidence in the Proposed Update or its support documents that Hollywood’s existing General Plan designations and zones are not capable of meeting the inflated population’s needs for housing and employment at any point in the plan’s 2005 – 2030 time period.

FLAW 5) FAILURE TO MONITOR INFRASTRUCTURE: According to the Proposed Update's Final Environmental Impact Report, most categories of public infrastructure and services are not capable of meeting the needs of the residents, employees, and customers that the Proposed Plan hopes to attract to Hollywood through its program of up-zoning and up-planning. These astounding revelations of a future low-amenity Hollywood are not surprising considering that citywide concerns over public services and infrastructure are barely detectable at City Hall. For example, the City of Los Angeles, in particular the Department of City Planning, despite state and local mandates, has not monitored local public services or infrastructure construction and maintenance since 1999. Changes in the intervening 12 years, which could be dramatic in an era of budget cutbacks, are unknown, but nevertheless set the context for the Proposed Update of the Hollywood Community Plan.

Furthermore, in some categories, there has been no formal planning for public infrastructure in Los Angeles through the General Plan process in over 45 years. The adopted General Plan Elements addressing infrastructure were prepared and adopted in the late 1960s. In the intervening decades they have not been updated, replaced, or rescinded. They have, however, been ignored, even though EIRs, such as that for the Proposed Update, concede that the city's infrastructure cannot handle existing user demand, much less the anticipated demands of the larger population resulting from extensive up-planning and up-zoning in Hollywood ushering in extensive by-right construction.

According to the General Plan Framework Element, there should be no increases in permitted density without adequate public services and infrastructure. Furthermore, there does not appear to be any proposal in the FEIR or the Proposed Update to monitor local public services or infrastructure conditions, including changes in demographics and related user demand, as well as the effectiveness of the updated Plan's policies and programs. Considering that the Proposed Update's FEIR's Statement of Overriding Considerations adopted by the City Planning Commissions is clear that Proposed Update will overwhelm the following environmental categories: public services, utilities, water resources, transportation, air quality (including construction and emission of greenhouse gases), noise, and cultural resources, these are astounding predictions of a low amenity future. Few Hollywood residents will accept the reduced quality of life in Hollywood resulting from the Update, even in the unlikely case that the promised jobs and transit ridership appear. To not even monitor these categories, as well as the other categories that the FEIR asserts will be mitigated, such as emergency services, is an extraordinary lapse in responsible local municipal governance.

This is why the Proposed Plan is based on a combination of low amenities and low regulation.