

April 4, 2023

To: Los Angeles City Planning  
Attention: Craig Weber, Principal City Planner and Priya Mehendale, Senior City Planner

**RE: Council District 4 and the Hollywood Community Plan Update**

I write with appreciation for the Planning Department's work on updating the Hollywood Community Plan (HCP). There has been robust engagement for more than a decade from the Department with countless residents and community groups for the HCP. From environmentalists to housing rights groups to public transit riders, this conversation has helped bring in both seasoned advocates and new faces. Our office and district are motivated by the knowledge that everyone wants to see an inclusive, resilient, and affordable Hollywood both now and for future generations.

The HCP was last updated and adopted in 1988. Since then, this regional core of Los Angeles has seen extraordinary growth. Metro's B Line, commonly known as the Red Line, started and completed construction since the adoption of the last plan, with five subway stations in Hollywood. Hollywood's entertainment and tourism industries have expanded. Hillside communities continue to see a proliferation of unwieldy, out-of-scale development. Hollywood and Los Feliz have experienced skyrocketing rents, and most new development is out of reach for many Angelenos. What has not kept pace with these catalytic changes are timely land use and zoning modernizations to allow for new housing to be built along transit- and jobs-rich commercial corridors in Hollywood's high-opportunity neighborhoods with the greatest access to parks, schools, grocery stores, and hospitals. In fact, antiquated regulations have led to slow growth, underdevelopment, and a reliance on onerous discretionary processes in many parts of Hollywood.

This process predates my tenure as an elected official by many years, and it has been weighed down by legal challenges and a lack of political will to make decisions. It is due time to act so that we are no longer in a state of precarity while our city faces an extreme housing affordability and homelessness crisis. My stance for the HCP is based on shared goals with my constituents to protect tenants and small businesses from displacement, preserve rent-stabilized and affordable housing stock, build more housing at appropriate scales and deeper levels of affordability along commercial corridors, direct growth away from sensitive hillside areas, conserve open space in the Santa Monica Mountains, protect historic and cultural resources, and improve infrastructure to support sustainable, connected, and walkable neighborhoods.

I believe approving the Draft Plan with some modifications gets us closer to accomplishing these goals, far more successfully than the current outdated plan. Alongside my colleagues Councilmember Yaroslavsky and Councilmember Soto-Martinez, with whom I share this Community Plan Area, I would like to propose the following changes to the HCP Community Plan Implementation Overlay (CPIO) for your review and consideration:

**Tenant Protections and No Net Loss**

- Modify the term for which housing units would be established as affordable within a mixed-income development receiving incentives from 55 years to 99 years.
- Require true one-to-one replacement for demolished rent-stabilized units by adding a clear definition and standards that projects using incentive-based programs cannot count their required affordable units towards rent-stabilized replacement requirements.
- Incorporate occupant protections under SB330/SB8 to further support low-income tenants against displacement.

**Increase On-Site Affordability in Commercial Corridor Subareas**

- Match requirements for the minimum number of on-site restricted affordable units for both Corridor Subareas, utilizing the set-aside program that requires a higher level of affordability.

**Enhanced Environmental Guardrails**

- Include clarifications to reflect recently adopted resolutions and policies, such as the Santa Monica Mountains Conservancy CEQA Trustee Agency Resolution, in the Biologic Resources section.

The existing zoning for the portion of Hillhurst Avenue north of the SNAP Specific Plan up to Los Feliz Boulevard (known as Subarea 13:1) is C4-1D. The Floor Area Ratio (FAR) is 1:1, with unlimited height, and a density of 1 dwelling unit per 400 square feet of lot area. Although there is not a height limit specified, the 1:1 FAR applied today promotes very low-scale buildings and generally little development or redevelopment activity in this high-resource area. The Planning Department originally recommended a 36-foot height limit, 1.5:1 FAR, and a density of 1 dwelling unit per 400 square feet of lot area for Subarea 13:1. On March 18, 2021, the City Planning Commission approved removing the proposed height limit set by the Planning Department, with the suggestion that the City Council insert a maximum height that is more in line with and conducive to achieve affordable housing on site. I would like to propose the following for Subarea 13:1: a 40-foot height limit, 1.5:1 FAR, and a density of 1 dwelling unit per 400 square feet of lot area in order to facilitate a feasible building envelope that can accommodate new housing still within a low-scale environment. I am also requesting that Subarea 13:1 not be included in the proposed CPIO.

My office makes these suggestions with the awareness that, for much of the area covered by the HCP, the Housing Element's Rezoning Program will rightsize and add additional residential zoning capacity near and along transit and commercial corridors in high resource areas, introduce citywide anti-displacement and tenant protection policies, and affirmatively reverse historic patterns of exclusion.

Commendable work has gone into the current Draft Plan. Thank you again to staff for your tireless efforts and your attention to the requests presented in this letter.

Warmly,



Nithya Raman  
Councilmember, District 4  
City of Los Angeles