

[On Hollywood Hills West NC letterhead]

January \_\_\_\_, 2019

Ms. Linda Lou, City Planner  
Los Angeles Department of Planning  
200 N. Spring Street, Room 667  
Los Angeles, CA 90012

[Linda.Lou@lacity.org](mailto:Linda.Lou@lacity.org)

Re: Comments on the Hollywood Community Plan (Update 2) DEIR  
Case No. ENV-2016-1451-EIR  
Case No. CPC-2016-1450-CPU  
State Clearinghouse Number 2016041093

Dear Ms. Lou:

The Board of Directors of Hollywood Hills West Neighborhood Council thanks the Planning Department of the City of Los Angeles, as well as you and your team, for the opportunity to respond in writing to the Hollywood Community Plan Update Draft Environment Impact Report (DEIR) before the comment deadline ends on January 31, 2019.

Over the last year, you and your team have reached out and given generously of your time and energy to help us understand what you've done in the latest Community Plan Update and Draft Environmental Impact Report (DEIR). We appreciate all the efforts you've made.

Certified in 2002, HHWNC is the certified neighborhood council for a large portion of the area which the community plan covers. HHWNC spans as far west as Laurel Canyon, east as far as Cahuenga Boulevard, and portions of Lake Hollywood, north as far as Mulholland Drive, Universal Studios, and Forest Lawn Drive and Barham Boulevard, including the residential communities of Hollywood Knolls, Hollywood Manor, and the Oakwood Apartments, which are now known as AVA Toluca Hills, and portions of Lake Hollywood, and south along Fountain Avenue from Fairfax Boulevard to La Brea Avenue and then to Sunset Boulevard to Crescent Heights/Hayworth (West Hollywood boundary) and Hollywood Boulevard to Cahuenga Boulevard.

Our constituent areas include single family homes in the Hollywood Hills, multi-family buildings and neighborhoods in the foothills, parts of the Regional Center, historic neighborhood-serving commercial blocks along Sunset Boulevard and several single family HPOZs (Sunset Square, Spaulding Square and Whitley Heights). Within our borders are Runyon Canyon Park, The Hollywood Bowl, Hollywood & Highland, Forest Lawn, The Ford Theaters, Comcast NBC Universal, Wattles Mansion and the Directors Guild of America.

Our breadth and diversity give us great insight into how the Community Plan Update is likely to affect Hollywood's future for both residents and businesses. HWNC represents well over 45,000 stakeholders.

We have a unique perspective and much knowledge of the great potential of the Proposed Community Plan Update, We also have a very well informed knowledge of the potential environmental impacts of the Proposed Community Plan Update DEIR.

We still believe that, despite some good progress, the DEIR for the Hollywood Community Plan update falls short of providing essential mitigations to address the severity of many impacts described in the documents and in our comment letter(s).

We've written to the City's Planning Department several times over the last decade during various stages of the community plans' circulation for public comment. We appreciate that the department has made some of the changes we've suggested, but there still seem to be too many items which haven't been corrected yet, including some which we thought the Department and Council District 4 had agreed with HHWNC would be incorporated in this latest version.

For example, we thought that the Spaulding Square and Sunset Square areas had reached an agreement with the Planning Department to make some specific changes, but those changes don't seem to have been included.

So, we're attaching and incorporating our prior comment letters for your additional (re)consideration at this time. We'd like to sit down with you, and go over those letters if that would be agreeable with you.

In addition, we remain concerned that the Proposed Community Plan Update DEIR still needs to provide a more detailed and thorough analysis, and include proposals about how to improve:

- (i) our area's infrastructure, utilities (electricity, water and gas),
- (ii) sanitation,
- (iii) traffic and transportation, mobility and parking,
- (iv) affordable housing,
- (v) noise,
- (vi) and public safety resources, including emergency services

in order to accommodate our current population and proposed growth.

In large part, the DEIR and the Community Plan seem more aspirational than analytical, practical or realistic.

Earlier in this letter, we referred to prior discussions you have had with Sunset Square and Spaulding Square.

We learned about those prior discussions when we looked at the DEIR. We thought that the Sunset Boulevard corridor from La Brea Avenue west to Crescent Heights may be the place in our area where the Hollywood Community Plan Update and DEIR need the most revisions. We were surprised to learn that you already were apprised of the problems we saw, and probably more issues too, but that those issues hadn't been addressed in the updated documents you released for this public comment round.

So, in preparing to discuss the Hollywood Community Plan at a recent HHWNC PLUM Committee meeting, we asked you to explain why the regional center transit corridor shown in Figure 3-2 extended on Sunset Boulevard for two blocks west of La Brea? It's the only place where the commercial core's dense zoning extends beyond the west side of La Brea Avenue. You told us that you were required to include the additional/second block west of La Brea

Avenue because you were required to include the Community Redevelopment Agency's area. However, the CRA was disbanded, and it has been several years since anyone has planned to put a Metro stop at that intersection. There are some bus routes running through that intersection, but not enough to justify extending the Hollywood commercial core area's high density developments to that second block. There are residential neighborhoods immediately to the north of the second block. So, the high density of the Hollywood Core area doesn't seem appropriate. Whether that block should be designated as a transitional area or reduced to the zoning provided in the remaining neighborhood area to the west might be an open question, but we think it should be re-zoned to be compatible with the adjacent neighborhood! At the moment, that extension of the Hollywood Core area's density seems inappropriate and worthy of being changed.

Since our conversation with you, we have learned from Council District 4 that the impact of State and/or Federally mandated up zoning for Transit Oriented Corridor (TOC or Measure JJJ) projects can be reduced if we develop and adopt special Hollywood area-wide standards for such projects. That seems like a sensible suggestion to reduce the impact of big development projects in this corridor and throughout our area. Council District 4 has expressed a willingness to lead on this issue. We suggest that the Planning Department and Council District 4 should work with us to craft special standards to be included in the Hollywood Community Plan Update and DEIR to reduce the super-density these developments bring.

Developing special Hollywood standards for TOC sites makes sense. It should be part of what you include in the Hollywood Community Plan.

When we used the interactive maps feature on your website, we also became concerned that so much of the Sunset Boulevard corridor has different allowable heights and FARs from lot to lot and block to block as we looked west from La Brea Avenue. It wasn't until we got closer to Fairfax Avenue and Crescent Heights that the allowable heights and FARs seemed more consistent. What we came away with is a sense that there was no real planning or rationale for this corridor; we wondered why? We wondered if this hodgepodge was a historical anomaly? And, whether some careful planning might help future development along this corridor make a better corridor?

We also wondered why the lots on the north side of Sunset Boulevard going west from Fairfax Avenue, which are very low buildings, should be zoned to become so much higher and denser. Here too, there are residential buildings right behind (to the north of) these lots. We don't think the proposed zoning, height limits, and FARs would be appropriate. We think they should be reduced and limited.

We hope you will work with us to resolve the Sunset Boulevard corridor issues so that these issues may be resolved long before we get to the City Council's consideration of the Hollywood Community Plan. There doesn't seem to be any rationale for the haphazard way in which the Sunset Boulevard corridor's zoning, allowable heights and FARs differ so much from lot to lot and block to block. We think your attention to this, and our working with you, could improve how this corridor is treated under the Hollywood Community Plan. We think this is an important issue for further consideration and discussion.

In reviewing the Hollywood Community Plan Update, we also found many additional items about which comments seemed appropriate.

it seemed that the community plan still has numerous errors and omissions.

For example, while Figure 2-1 shows The Laugh Factory is a cultural facility in HHWNC's Area, so is the Woman's Club of Hollywood.

In LU.2.4, there is a goal of investigating and considering feasible secondary access to connect existing street networks to promote secondary access to hillside development. We assume you are discussing and suggesting that “paper streets” be turned into real streets in order to promote additional hillside development.

This goal seems new and previously undiscussed.

We strongly believe that the Planning Department’s role in drafting the Hollywood Community Plan should not include promoting secondary access or promoting hillside development except where there are public safety concerns. Why would the department want to promote such hillside development? the hillsides are high fire danger zones. Increasing development in our hillside areas also will increase our fire danger(s). Please revise and/or delete this from the Final EIR and Hollywood Community Plan Update.

In LU6.7, you adopted our 2011 suggestion to ensure that discretionary rooftop commercial uses within 500 feet of residentially zoned area mitigate noise levels, including by doing a noise analysis which would identify feasible mitigation(s). We’ve learned since 2011 that our stakeholders can be effected by rooftop noises even they live up to (and even beyond) 1,000 feet away. So, while extending the distance would be helpful, we also think that an outright ban on many of these discretionary rooftop uses should be considered and adopted. All too often, discretionary rooftop uses seem destined, if not guaranteed, to become future nuisances to adjacent and even fairly distant residents. In the hillsides, noises rise. It’s why the Mulholland Design Guideline 37 bans rooftop equipment, and why the Mulholland Design Review Board rarely allows any rooftop deck(s). It’s a long established policy and practice, but it falls short of actually being included yet in a design guideline.

In Figure 4.1, the Franklin Corridor Study Area from La Brea to Vine is mentioned, but not well explained. if it is going to be a design overlay area or a subset of the CPIO, a better and more detailed explanation should be provided.

On Page 4-9, the list of parks doesn’t seem to include The Wattles Farm and its community garden, which is open to the public during day time hours on many days each week. The Laurel Canyon Dog Park, the Briar Summit Open Space and the Oakshire Open Space also should be mentioned.

In PR3.10, the community plan mentions supporting the use of rooftops for open space. We think that support should be limited to where public safety permits. We have public safety concerns, and those concerns include the rights of neighbors to quiet enjoyment of their apartments and other homes.

We also have a broader concern about how the Planning Department is exercising its own authority to treat private open space as public open space. We think that there is a significant difference. Our community needs more public open space. Counting private open space towards any developer’s obligation to provide open space cuts back and down on the amount of public open space. it seems that the department is not encouraging or requiring more public space when it allow private open space to be counted. In our view, if the public can’t go there, it’s not public open space.

In Figure 6-3, bicycle lanes on both sides of Cahuenga Boulevard in The Cahuenga Pass are shown, but aren’t referred to in the text. it seems that there should be an explanation.

Just as we wrote to you in February, 2018, the draft of the HCPU2, just like the new Hollywood Community Update DEIR establishes a good initial framework for the future of Hollywood, but lacks the detail(s) required to properly manage and mitigate developments' impacts in coming years. HHWNC hopes that the DEIR language will be strengthened, and that there will be more specific language to address the many issues and concerns still facing us here.

[There are additional lists of open items and concerns, which we've attached for your consideration and further discussions.]

We look forward to working with you to do so.

Sincerely,

Anastasia Mann  
President  
Hollywood Hills West Neighborhood Council

Attachments

cc: CD4  
CD 13