

February 21, 2018

Conni Pallini-Tipton
Los Angeles Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

RE: HHWNC Comments on Hollywood Community Plan Update 2 (HCPU2)

Dear Ms. Pallini-Tipton,

The Board of Directors of the Hollywood Hills West Neighborhood Council (HHWNC) thanks the Planning Department of the City of Los Angeles for the opportunity to respond in writing to the Hollywood Community Plan Update 2 ("The Plan").

Over the past few months, HHWNC issue and area committees held stakeholder meetings to discuss The Plan and gather community feedback. Though many homeowner associations, community groups and individual stakeholders within the HHWNC boundaries have already submitted specific policy and zoning change requests, this letter aims to aggregate all the comments and concerns heard during the meetings held by HHWNC's committees. In addition to this response, please also see the attached specific change requests and minutes from HHWNC committee meetings as well as letters from stakeholder groups ("Addendum"), all of which were the source material for this letter.

Certified in 2002, HHWNC is the largest geographic neighborhood council in the city of Los Angeles. HHWNC spans from Laurel Canyon/Crescent Heights and the City of West Hollywood in the west to Cahuenga Boulevard in the east, from Fountain Avenue and Sunset Boulevard (along the border of West Hollywood) in the south, to Mulholland Boulevard and the 134 freeway (from Zoo Drive) along the southern bank of the Los Angeles River in the north. Within our boundaries lie a diverse collection of residential neighborhoods, commercial districts and parks that well represent Hollywood as a whole.

Our constituent areas include single family homes in the Hollywood Hills, multi-family neighborhoods in the foothills, parts of the Regional Center, historic neighborhood-serving commercial along Sunset Boulevard and three 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 Amphitheatre, NBC/Universal, Wattles Mansion and the Director's Guild of America. HHWNC also includes the Cahuenga Pass, Barham Bridge, the Franklin Corridor from La Brea to Highland and historic Mulholland Drive. Our diversity gives us great insight into The Plan and how it will affect Hollywood's future for both residents and businesses.

HHWNC committees gathered much input from stakeholders, which we have outlined in this response. However, The Plan draft does not address Public Safety/Emergency Services or Infrastructure, both of which must be thoughtfully considered as part of any plan for Hollywood's future growth and

development. We expect these topics will be fully addressed in the The Plan's EIR when it is released and look forward to providing additional comments on these important subjects at that time.

Land Use & Urban Form

The Plan recognizes Hollywood's distinct neighborhoods and the importance of "respecting established and desirable community character and context". However, The Plan fails to provide specifics on how neighborhood character will be protected and conserved (especially in historic areas) in light of its stated development and mobility goals. The Plan proposes density and growth around public transit while leaving historic neighborhoods intact, but does not address the inherent conflict between growth and preservation in historic districts situated near mass transit (Metro and bus lines).

Similarly, The Plan lacks specifics on how the impacts of new development on residential neighborhoods generally will be properly mitigated, especially in historic areas. The Plan should discourage commercial development that encroaches on or results in un-mitigatable impacts to residential neighborhoods in/near the Regional Center and abutting HPOZs. Roof-top decks should not be allowed within 1,000 feet of residential areas and valet parking should be restricted from residential side streets. 24/7 and extended hour commercial businesses should be discouraged near residential neighborhoods and commercial corner restrictions must be maintained.

Neighborhood scale development must be required and not simply encouraged. State and local laws allow projects near mass transit or offering affordable housing to increase density and height above stated zoning restrictions. Therefore, The Plan should incorporate lower height limitations and FARs to ensure that any new development conforms to existing residential neighborhood character and scale. Where neighborhood height transitions are needed, the higher-density area should scale down to the lower density area (not the reverse). For example, higher density in the Redevelopment Area must scale down east of La Brea Boulevard in a transition to the lower-density Revision Area located west of La Brea Boulevard.

Though The Plan calls for housing that meets varying income levels and family types, it does not address how the city will incentivize this type of development. The Plan must prioritize not just low-income housing (which is often used in the discretionary process in exchange for increased density), but also affordable and truly market-rate housing for singles, couples and families. Existing rent-stabilized housing must be preserved, and The Plan should specifically discourage tear-downs of current affordable rental units that result in the displacement of long-time residents. A goal of 30-50% affordable housing in new residential developments should be implemented.

Despite its destabilizing influence on the rental housing marketplace, the plan does not discuss short-term rentals such as AirBnB and other "smart" technologies that can affect the availability of rental units. The Plan must include an analysis of these factors to determine how their impacts can be addressed and mitigated.

The Plan must recognize a distinction between the Redevelopment Area, which includes the Regional Center, and the lower-density Revision Area, which is neither an entertainment nor an employment hub. It also must include the Alquist-Priolo Hollywood Fault, which was mapped in 2014, and consider its impacts when considering the types and locations of future development projects.

Public Realm, Parks and Open Space

The Plan is a good start towards preserving and increasing parks and open space, however it does not go far enough when it comes to the specifics.

The Plan must encourage preservation and creation of public space and greenspace that benefits the community at large. Private balconies, residential rooftops and plazas should not be considered public or green space and must not be incentivized in exchange for increased project density. Minimum requirements should be set for true public greenspace in new development projects, with a requirement to replace any greenspace or trees removed due to a reconfiguration of buildings/structures on the property. Planting of drought-tolerant trees and landscaping should be required in new development and on city-owned parkways.

Pedestrian access and safety should not just be encouraged in new development, it must be required. Wide, ADA-compliant sidewalks should be preserved and The Plan must not allow them to be removed by new developments building to the property line. Sidewalk width must take into account planted trees, bike racks and above-ground utility poles. Sidewalk narrowing and/or removal of existing parkways should be prohibited. Sidewalk dining should be discouraged unless the dining area is fully located within the property line so as not to restrict pedestrian sidewalk use.

The Plan should include suggestions for improving access to Runyon Canyon, which is within the HHWNC borders. Ride share, pedestrian-specific routes and public transportation options must be explored to mitigate impacts on residents living near the park. The Plan must also include safety measures that address the high fire risk in parks and surrounding neighborhoods, as well as means of preserving the wildlife that inhabits and traverses the hillsides.

Additional study should be done around rooftop amenities in developments below/beneath the Hollywood Hills, where sound travels far and upwards and may impact homeowners. Rooftop amenities should be restricted in developments near freeways to minimize health hazards from air pollution. The impact of sound and light pollution from new development must also be considered.

The Plan must recognize that the views and vistas of parks and open spaces are part and parcel to the open spaces themselves; they must be protected. This includes views of Runyon Canyon Park, the Hollywood Sign and the “skyline palms” which are considered one of HHWNC’s distinctive characteristics.

The Plan discusses public/private partnerships in regards to building, maintaining and funding parks, however it does not provide sufficient detail about how these partnerships will work. The CAP Park and the Pink Dolphin/Recreation and Parks partnership for Runyon Canyon (defeated through a community-driven legal challenge) are examples of such partnerships. Though the Runyon Canyon/Pink Dolphin sponsorship proposal would have resulted in the park being reclassified from a wilderness park to a recreation center, no public vetting or community outreach was undertaken by Recreation and Parks. The Plan must provide mechanisms for full, ongoing transparency in these partnerships to ensure the public understands the pros and cons of such endeavors and what private corporations will gain in exchange for the benefit to the community.

Preservation

We appreciate The Plan's inclusion of a section on historic preservation, as our boundaries include a dense number of locally and federally-registered historic buildings and HPOZs. However, The Plan should include stronger restrictions on development near historic sites and call for a new study by Survey LA to identify additional historic buildings and districts so they may be protected and conserved. New development should not physically overwhelm historic neighborhoods with excessive height or density, nor should it visually change their aesthetic character. The ability to view historic sites from existing vista points must be preserved and encouraged.

Mobility and Connectivity

While The Plan's goal of increasing walking, bicycling and public transit use is an admirable one, it should not be unrealistic about the number of people who still rely on vehicles to move about the Hollywood area. The Plan must acknowledge that Hollywood is attached to the Hills and people in Hollywood will always require cars. When planning for future growth in Hollywood, parking and traffic congestion must be considered. The Plan should require Neighborhood Traffic Management Plans as part as potential mitigations for high-density or major development projects. Additionally, The Plan should call for increased enforcement to address ongoing traffic issues and mechanisms for funding for such efforts.

With growth comes an inherent increase in traffic congestion which The Plan fails to mitigate through either regulated density or realistic alternatives. In addition, it has not shown that emergency vehicle access, especially to fire-prone hillside areas, will not be negatively impacted by increased traffic resulting from new development. With Hollywood's challenging topography, The Plan must take into account the cumulative impacts of new development, increased intensity of use and the associated traffic on emergency services response times. Emergency services must be able to quickly access the Hollywood Hills and foothills, whether responding to a fire, medical emergency or earthquake.

The Plan fails to adequately address issues such as cut-through traffic resulting from increased development, protecting residential and hillside streets from navigational wayfinding apps such as Waze and Google Maps, the increased popularity of ride-hailing apps such as Uber and Lyft, and autonomous

vehicles which may become more common in the future. Designated pick-up and drop-off locations should be required for all new development.

Though The Plan calls for focusing new residential and high-density development near Metro Red Line stops and bus routes, it does not provide any data to show that ridership on public transportation has reduced vehicle usage or traffic. In fact, a recent report shows that “ridership on Los Angeles County's bus and rail network last year fell to the lowest level in more than a decade” (Nelson, Laura J. "Ridership on Metro fell to the lowest level in more than a decade last year," *Los Angeles Times*, January 24, 2018). The city must provide better incentives for utilizing public transport and improved signage for public transportation, especially for those riders without regular access to the internet. Bus stop shelters, improved lighting near bus stops, posting of regular bus schedules and wider sidewalks providing safety and security while waiting for the bus should be encouraged.

The Plan acknowledges and highlights Hollywood's appeal as a tourist destination, but it does not address the “population swells” resulting from tourism or special events. It fails to provide serious policies for mitigating street closures (such as for movie premieres, the Academy Awards, the LA Marathon and parades/protests) and event-related traffic (such as for the Hollywood Bowl or Ford Amphitheatre). Traffic congestion related to tourism and special events has a significant impact on residents living in or near the Regional Center. The Plan must recognize that Hollywood is still a neighborhood with residents who need to get to work, the doctor, etc. Additionally, these events have impacts far beyond the event location when traffic must be diverted away from closed or congested streets.

The Plan includes a policy to “Support LADOT efforts to manage traffic and circulation needs resulting from the Hollywood Bowl, film premieres and award shows, theaters, and other events.” However, LADOT efforts up to this point have been unsuccessful. The Plan needs to better address this ongoing issue, understanding that it will only be exacerbated by future growth in and around the Regional Center. Limitations on the number of events that may be held per night should be considered.

Pedestrian safety must be a priority, especially for children and parents. Gardner Street Elementary, Valley View Elementary, The Canyon School and all schools within The Plan area should be studied as part of the Safe Routes to School program, not just those designated by LAUSD as the most vulnerable.

Existing parking lots must be preserved, and public parking removed by new developments should be replaced within the development itself at a comparative cost to the public. Public parking lots should be maintained not only near restaurants and entertainment uses, but for all commercial and residential uses to ensure easy pedestrian access for residents and visitors.

Bicycle parking should be well-lit, safely accessible and available in areas that are protected from the elements in case of inclement weather. Bus stops should provide enough space for waiting bicyclists to encourage last-mile bicycle use.

Summary

The draft of the HCPU2 establishes a good initial framework for the future of Hollywood, but lacks the detail required to properly manage and mitigate development in coming years. HHWNC hopes the upcoming EIR will include stronger and more specific language to address the many issues and concerns we've outlined here.

Sincerely,

Anastasia Mann
President
Hollywood Hills West Neighborhood Council