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HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL

Certified Neighborhood Council #52

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January 20, 2019

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

Re: Hollywood Community Plan Update
City EIR No. Env-2016-1451-EIR
CPC-2016-1450-CPU, State Clearing House No. 2016041093

The Hollywood United Neighborhood Council's Board of Directors at their January 14, 2019 regularly scheduled meeting voted unanimously to approve the following comments regarding the HCPU draft EIR:

1. HUNC requests a 30 day extension to comment due to the holidays and Brown Act caused delays in ability to review. Due to the resulting short time to comment, HUNC can only submit the below comments. The following is in no way indicative of the totality of HUNC's concerns as the entire plan needs to be reviewed and the Brown Act precludes the neighborhood council from conversations outside of regular board and committee hearings. HUNC will therefore be providing more comments as soon as possible.
2. Earthquake and Hollywood Fault Line: While the CBIA v. BAAQMD lawsuit decision held that CEQA generally does not require a lead agency to consider impacts of existing environment on future residents or users of a project, the fact that the HCPU is the prototype for all other communities in Los Angeles and the fact that the Hollywood Fault Line is an established fault line, the potential impact of earthquakes of various magnitudes must be considered in the HCPU draft EIR. The potential property damage and loss of life are significant and must be studied and included in the draft EIR in relation to the type and location of development.
3. The HCPU should consider having its own emergency plan separate but in compliance with the City Disaster Preparedness Plan element under the General Plan due to:
 - A) Proximity to the Hollywood fault line.

- B) The limited access in some of the hillside area.
 - C) The high number of tourists and the need to accommodate multiple languages.
 - D) The existence of liquefaction and the allowance of constructing buildings past height restrictions.
4. The affordable housing incentives and requirements are severely inadequate as well as the treatment of those living in affordable housing who will be displaced by the higher priced apartments being supported by the HCPU. While the city has been using and plans to continue using AB1505, the rate of affordable housing it creates is not enough to replace the RSO stock that is being destroyed and the affordable housing that is still needed to cover the present population of Hollywood (see attached HUNC position paper regarding housing in Hollywood). The HCPU should contain plans to increase affordable housing beyond what is currently in the draft EIR.
 5. Increasing the FAR to 6.1 is excessive given the earthquake and building density issues in Hollywood. This ratio far exceeds the ability of the infrastructure, traffic and road usage to be handled safely in Hollywood. A maximum FAR of 4 to 5:1 is more appropriate.
 6. The HCPU fails to examine other alternatives such as a decrease in population and the down-zoning that downsizing should trigger. The current plan is only assuming an increase in growth of population. The plan fails to acknowledge the saturated increase of studio or single-bedroom units which don't foster family growth.
 7. Designating Beachwood Drive as a Collector Street does not take into account that a majority of the street does not meet the definition of Collector Street for much of its length above Franklin Blvd. Beachwood Drive needs to be designated as a Local Street Limited.
 8. HCPU fails to acknowledge the option of land swapping for privately owned parcels with city owned parcels in order to create more parks or parking structures. Parking structures should be encouraged on land that can't be developed due to contamination issues.
 9. The transportation module does not study the number of bus riders in Hollywood, frequency of bus routes and future potential use of buses. The draft EIR needs to be expanded to include studies of increased use and number of buses at a reasonable fare within Hollywood to complement walking and bicycles. The study does have estimates of increased automobile travel that originates and ends within Hollywood as the basis for much of its automobile review which can also be used as a guide for the number of buses needed, routes and frequency and future rider usage. The study should include free bus lines within the heart of Hollywood as many other cities have successfully implemented. This study needs to include dedicated bus lanes on the more congested streets to encourage local use.

Thank you for your consideration,
Sincerely yours,

Jim Van Dusen*
Chair, Planning and Land Use Management Committee

George Skarpelos*
President

*signed electronically