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https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_4-04-23.pdf	4/4/23	Councilmember Yaroslavsky	CD5 Requests for the Hollywood Community Plan Update. See Council File for comment.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_04-04-23.pdf	4/4/23	Councilmember Raman	CD4 Requests for the Hollywood Community Plan Update. See Council File for comment.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-04-23.pdf (entire PDF, 3 pages)	4/4/23	UNITE HERE LOCAL 11	Request to include a hotel CUP appealable to Council that will consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand. The CUP should also require an analysis of the impact of the project on housing and small businesses. The CUP should explicitly ban the conversion of RSO units or require replacement with affordable units. Do not increase base FAR. Hotels should not be allowed in projects using CPIO incentives Require 1 to 1 replacement for projects using CPIO, TOC, and DB	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-17-2023.pdf (entire PDF, 3 pages)	4/17/23	Abundant Housing - Scott Epstein	Support of adopting the plan - CPIO will help produce and enhance both mixed income and 100% affordable projects.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_AM_04-17-2023.pdf (entire PDF, 2 pages)	4/16/23	EAA - Marleen Fonseca	Support of adopting the plan	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 1-6 of pdf)	4/19/23	Dick Platkin	The Proposed Plan is "fatally flawed" for the following reasons: Reason 1. The current (2021) Update is also based on outdated demographic data, in this case 2010 census data that is now 13 years old. As for three year old 2020 census data, the new Update and its Environmental Impact Report excludes it. Reason 2. The current Update also fails to expand municipal services and infrastructure to meet the needs of the people and buildings it intends to attract to Hollywood through widespread up-zoning. Reason 3. The current Update, like the previous 2012 version, did not adequately consider its environmental impacts.	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and the discussion on Baseline Population in the Director of Planning Memo dated 4/18/23.

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			Methodological flaws repeat: Improper Sequencing: The current Update, like the 2012 Update rejected by Superior Court Judge Allan J. Goodman, is improperly sequenced. It should have followed, not preceded, the update of the General Plan's mandatory and optional citywide elements, most of which are in urgent need for updating. For example, the City Council adopted the General Plan elements for Infrastructure and for Public Services in the late 1960's. Since then Los Angeles has experienced enormous changes but these two Elements have never been rescinded or brought up-to-date.	The commenter provides their opinion that the General Plan Framework should be updated before the Community Plan. The Hollywood Community Plan is one of 35 Community Plans in the City that make up the state-required Land Use Element.
			General Plan Conflicts: The court-annulled 2012 Update, like the current Update, conflicts with the General Plan Framework Element. The Framework is an explicitly growth-neutral plan, not a growth-inducing plan, like both Hollywood Community Plan Updates. In fact, Judge Goodman's 2013 decision directly quoted from the General Plan Framework: "The Framework Element does not mandate or encourage growth.	See the Findings section (starting on page F-1) in the Staff Recommendation Report, Exhibit A of the PLUM Transmittal to Council. https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_11_08-11-21.pdf
			Failure to Calculate Existing Zoning Buildout: The 2012 Update, like the current update, does not calculate the build out of existing zoning, as well as zoning entitlements already granted to developers. Luckily, this data is available from other sources. According to Hollywood Heritage, "No upzoning is needed in Hollywood. All 34,000 residential units supposedly needed in the Hollywood Community Plan area have been constructed, permitted, or entitled since the preparation of the plan's DEIR in 2016."	See Section 4.13 (Population, Housing, Employment) and Appendix B (Methodology) of the DEIR as well as Master Response No. 2 (Population, Housing and Employment) in the FEIR and the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
			Missing Monitoring Program: The 2012 Update, like the current update, did not include a monitoring program to determine if its demographic and infrastructure assumptions were correct, or if they should be amended to reflect actual conditions.	See Director's Memo to PLUM dated 4/18/23, specifically Section IV. Framework Element Reconsideration and Supplemental Findings (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
			Inadequate Municipal Services and Infrastructure. The Hollywood Community Plan Update's Draft Environmental Impact Report is clear that Hollywood's aging infrastructure will not be upgraded. The DEIR's rationale for this is that all new buildings and their residents will be located in areas with surplus infrastructure and public service capacity. As for data substantiating this claim, it is not presented, presumably because it does not exist.	See Master Response No. 4 (Infrastructure) of the FEIR
			Outdated and Inaccurate Demographic Data. In 2023 the City Council will finally consider and vote on the second Hollywood Community Plan Update, 13 years after the Bureau of the Census collected the 2010 census data. After that, in 2016 the Census Bureau extrapolated its 2010 data, which City Planning adjusted with State Department of Finance and Southern California Association of Governments (SCAG) population forecasts. Most revealingly, City Planning's 2040 population forecast exceeds SCAG's 2040 forecast by 17,000 - 48,000 people.	See the Master Response No. 2 (Population, Housing and Employment) in the FEIR and the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 7 of pdf)	4/19/23	Christopher Barton	I support the Hollywood Central Park, a proposed deck park over US 101 within the Hollywood Community Plan area. The Hollywood Central Park will create much needed open space and 38 acres of new park acreage, addresses environmental and social justice, and curb the effects of the climate crisis. As a Hollywood Stakeholder, I request that you please vote to approve the Hollywood Community Plan Update as presented by the Department of Planning.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 8 -29 of pdf)	4/19/23	Hollywood Heritage Letter Richard Adkins	Attached you will find Hollywood Heritage Hollywood Community Plan DEIR comments submitted for inclusion as required as a part of the HCPU EIR process and the City Planning Commission review. As this document does not seem to be a part of the Council File, please include this copy in the Council File.	This was DEIR Comment Letter No. 26 and a response to this comment was provided in the FEIR on pages 3-137 through 3-142.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 8 -29 of pdf)	4/19/23	Hollywood Heritage Letter to CPC from February 14, 2021	Remove the CPIO upzoning incentives from Hollywood Boulevard and the Character Residential Districts Reject the counterproductive, unexplained, and damaging Ordinance in Exhibit I, which repeals from existing law the same provisions that this Plan quixotically says need to be implemented Public Information and the proposed 511 List: Per our conversation, Hollywood Heritage is requesting a separate ZI to identify historic resources within the Redevelopment Area. The current ZI 2488 for the Redevelopment Area does indicate that there may be certain parcels which contain historic resources which are subject to further assessment/review, but the code is not specific to historic resources.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 30-31 of pdf)	4/19/23	Hollywood Heritage	Submitted to the CPC in February 2021 includes map of the central Hollywood redevelopment area. The “upzoning” map shows the “subareas” of the plan as red boundaries, all where upzoning is proposed, and the color filled areas show where density bonus or both is proposed. (Dated Feb 2021- only a few recommendations changed in Aug 2021, and then upzoning at Hollywood Blvd near Vine at Planning Commission.)	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 32-33 of pdf)	4/19/23	Hollywood Heritage	Map showing conflict of proposed plan subareas and designated resources and 2020 Survey LA	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 34-36 of pdf)	4/19/23	Hollywood Heritage	Comment includes and attachment for the casefile of the Director's Initiation of Legislatie Action Hollywood CPIO dated February 11, 2020	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 37-41 of pdf)	4/19/23	United Neighborhoods for Los Angeles (UN4LA) / Casey Maddren	The Plan apparently does not comply with LAMC Sec. 11.5.8, which requires the existence of a program to create an inventory of RSO and affordable units and to monitor the inventory;	Program 104 of the Hollywood Community Plan Text (Exhibit C of the PLUM Transmittal) states the following: Monitor the inventory of units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.
			The Plan anticipates significant growth, but it's unlikely that LA's increasingly dry hydrology can sustain anticipated levels of growth; Realistic Projections of Available Water Resources Make the Plan's Growth Projections Appear Unsustainable. The DEIR for the Plan predicts that LADWP will be able to supply water for projected growth under any scenario, based on the assurances of the 2020 Urban Water Management Plan. If we look at the UWMP's Section ES-6, Water Supply Reliability, we find the following statement: "LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios." Unfortunately, in light of the extreme dry conditions experienced in LA in recent years, it has become clear that the projections made in the 2020 UWMP regarding LA's future water resources are not realistic. To give just one example, in Exhibit ES-Q, Fiscal Year 2044-45 Dry Hydrology, the graph shows an expected total production of 746,000 AF, based on the assumption that LA will get 43% of its water from the Metropolitan Water District. The MWD relies heavily on the Colorado River to supply the needs of LA area jurisdictions. The fact that last year the US Bureau of Reclamation was warning that Lake Mead was approaching dead pool seems to be a strong indication that the UWMP's projections are dangerously optimistic. The Interior Department is currently studying options to reduce allocations to stakeholders that receive water from the Colorado River. Of the options Interior is studying, Action Alternatives 1 and 2 both involve the reduction of allocations to stakeholders.	See Response to Comments O-10.14, and I-2 in the Housing Element FEIR. Response to Comment O-10.14 includes additional details from DWP about the 2020 Urban Water Management Plan, as well as details about DWP's Water Shortage Contingency Plan. https://planning.lacity.org/eir/HEU_2021-2029_SEU/Feir/files/3-Responses%20to%20Comments.pdf
			The Plan should mandate the verification of new affordable units by inspection to ensure that the units are occupied by households that meet affordability requirements;	The Housing Department is the responsible department for this verification process and for enforcement. The Plan does not mandate existing requirements of other departments or agencies.

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			Hollywood's tree canopy is declining, but the Plan increases opportunities for byright development with no environmental review;	The Hollywood CPIO creates a ministerial administrative review process for projects that comply with the CPIO regulations. However, zoning requirements that address lot coverage and landscaping requirements would still apply even if a project does not require environmental review.
			The Plan does not meet the General Plan's monitoring requirements;	See Director's Memo to PLUM dated 4/18/23, specifically Section IV. Framework Element Reconsideration and Supplemental Findings (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
			The Plan's projections re GHG emissions are based on the assumption that transit ridership will increase with greater density, but this is not supported by recent housing and transit data;	See Response 46-3 on page 3-242 of the Hollywood Community Plan FEIR
			The Plan's estimates of current population in the HCP area are not accurate, and projections of future growth seem at odds with recent reports of population decline.	See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 42-50)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 1 - January 31, 2019 Comment Letter on the DEIR)	This was a copy of the January 31, 2019 letter that UN4LA submitted on the Draft EIR.	Addressed in the FEIR in Response to Comment Letter No.46 found on pages 3-241 through 3-246 of the Hollywood Community Plan FEIR.

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	The EIR acknowledges that the 1988 Plan offers sufficient zoned capacity to accommodate SCAG's growth projections for 2040. Upzoning to increase capacity beyond SCAG projections is clearly an effort to induce growth. Additionally, recent population data shows that Los Angeles has actually seen a net decrease over the last few years. As for locating new housing near employment centers, the Recommendation Report fails to acknowledge the possibility, voice by a number of observers, that the pandemic may cause a permanent shift toward working at home. While it's too early to tell whether this change will be long-term, the Recommendation Report's failure to even mention this possibility shows that the authors are more concerned with justifying increased density at all costs, rather than responding to actual population and employment trends.	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and the discussion on Baseline Population in the Director of Planning Memo dated 4/18/23.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	Covid impacts: While the pandemic began well after the publication of the HCPU and the DEIR, its impacts have been substantial and could be lasting. Many observers have noted the pandemic's effects on population distribution, housing, transportation, commercial space and office space. The City could not have foreseen these impacts, but it must take the time to assess them before moving ahead with approval of a plan govern new development.	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	Comment on Redevelopment Plan Ordinance: The City has illegally proposed an ordinance which would effectively gut the Hollywood Redevelopment Plan. The proposed ordinance would remove necessary affordable housing requirements. It would also remove protections for historic structures within the Hollywood area. It is disturbing that the City, having failed for years to meet RHNA goals for affordable housing, and at the same time having failed miserably to meet the Hollywood area's need for affordable housing, is now attempting to erase legal requirements set by the Hollywood Redevelopment Plan.	See the Redevelopment Plan Consistency Findings section (starting on page F-1) in the Staff Recommendation Report, Exhibit A of the PLUM Transmittal to Council. https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_11_08-11-21.pdf

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	Population: Housing, Transit, Employment Policies vs. Reality recent population data from the California Department of Finance shows that from July 1, 2019 to July 1, 2020, LA County saw a net loss of 40,036 people. This seems to suggest that SCAG's growth projections need to be revised, and that the HCPU's proposals for accommodating growth need to be revisited. While the numbers show that the City has been successful in building more housing in Central Hollywood, the population density has actually declined. This appears to undermine the City's stated goal of focussing growth in urban centers to promote gains in transit ridership and active transportation. This also undermines the City's claim that dense new development has encouraged population growth near job centers. While the City has been very successful in luring large employers to the Hollywood area (including Netflix, MTV, Comedy Central, BET, VH1 and Spike), the numbers above show that the growth in jobs has not been matched by a corresponding increase in population.	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	Parks/Hollywood Central Park The City claims that the Plan will help to address the need for park space accessible to Hollywood's neighborhoods, but it fails to offer many specifics beyond the proposed creation of the Hollywood Central Park, a cap park which would cover a segment of the Hollywood Freeway. In fact, the Hollywood Central Park is an absurdly costly and impractical project that is unlikely ever to be realized. First proposed over a decade ago, since 2011 the City has spent over $2,000,000 on an EIR for the Park that has still not been released. In 2014 it was estimated that the Park would cost $1,000,000,000, and surely the actual cost has grown since then, but the City is currently dealing with a serious budget crisis which makes it unlikely the Park could be funded any time in the near future. Because the HCPU relies heavily on the creation of the Hollywood Central Park, while offering no other meaningful proposals to create park space in Hollywood, the Plan fails to meet the community's needs for recreational space. The EIR fails to adequately assess the impacts proposed new development could have on this area, which already lacks sufficient community-serving parks.	The Hollywood Community Plan Update does not rely on the creation of the Hollywood Central Park. Chapter 7 (Implementation) of the Hollywood Community Plan Policy Document notes the creation of the Hollywood Central Park as a future implementation program. Section 4.14 (Public Services) of the DEIR states that the Department of Recreation and Parks is evaluating the development of this Park but doesn't assume that it will be developed. The impact of the Proposed Plan on parks was evaluated based on the following thresholds of significance in accordance with Appendix G of the CEQA Guidelines. - If the Proposed Plan would increase the use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated. - If the Proposed Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for parks.

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	Solid waste: Adoption of the HCPU and its associated CPIO could bring about significant new growth in the Hollywood Area, and therefore a significant increase in solid waste. The EIR fails to accurately assess impacts from the production of solid waste. Simply falling back on the claim that there is adequate landfill capacity to absorb additional waste is not enough. The EIR fails to state that the City is well out of compliance with AB 939, which requires California cities to divert 50% of their solid waste to recycling. Also, landfills are a significant source of GHG emissions, and the EIR fails to accurately analyze these emissions resulting from potential new development under the Plan. The EIR falsely claims that the HCPU complies with AB 939. It offers no actual data on recycling of solid waste. It does not offer a realistic assessment of impacts from the failure to meet State-mandate recycling goals.	In 2010, the Los Angeles City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition (C&D) Waste Recycling Ordinance that requires all mixed C&D waste generated within city limits be taken to City certified C&D waste processors. LA Sanitation (LASAN) is responsible for the C&D waste recycling policy. All haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste, and C&D waste can only be taken to City certified C&D processing facilities. A private waste hauler collecting solid waste within the City, including Construction and Demolition (C&D) Waste, must obtain an AB 939 Compliance Permit (a.k.a. Waste Hauler Permit). For more information on the City's compliance with AB 939 and GHG emissions from landfills see the Bureau of Sanitation's (LASAN) response in the Responses to Additional Letters Received on the Housing Element EIR - see https://clkrep.lacity.org/onlinedocs/2021/21-1230_misc_1_11-19-21.pdf at page 18.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 51-59)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 2 - February 18, 2021 letter to CPC)	COMPLY WITH LAMC SEC. 11.5.8.: The CPU must include a program to create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households	Program 104 of the Hollywood Community Plan Text (Exhibit C of the PLUM Transmittal) states the following: Monitor the inventory of units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 60-61)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 3- March 17, 2021 letter)	- No Increase of Base Floor Area Ratio (FAR) - The Plan Must Include Real, Enforceable Anti-Displacement Measures - Replacement Units Must Not Be Counted Toward Affordable Requirements - A Conditional Use Permit (CUP) Must Be Required for Hotel Projects Which Involve the Demolition/Conversion of Housing - The HCPU Must Mandate Verification of Affordable Units by Inspection	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 60-61)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 3- March 17, 2021 letter)	URBAN FOREST/AIR QUALITY/URBAN HEAT ISLAND EFFECT: The HCPU discusses maintenance of street trees, but does not address impacts to the larger urban forest, which reduces temperatures and enhances air quality. The HCPU discusses maintenance of street trees, but does not address impacts to the larger urban forest, which reduces temperatures and enhances air quality. The HCPU's generous incentives with regard to increased density and FAR, and also the incentives allowing reduced setbacks, will undoubtedly lead to a loss of tree canopy and green space without specific mitigation. This will increase the Urban Heat Island effect, which results from the replacement of permeable surfaces and plant life with hardscape. The loss of trees also negatively impacts air quality, which will cause health harms to area residents. Under Mandatory Findings of Significance, CEQA requires analysis of whether "The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." The one program related to the urban forest, P119, simply says the Plan will "Support City efforts to develop and implement sustainable urban forest plans [….]" This is not enough.	The Proposed Plan directs future housing and job growth to the regional center and along corridors, generally covered by the Hollywood CPIO is areas that are near public transit systems. By directing growth here, the Proposed Plan directs growth away from the hillside areas that have large areas of permeable surfaces, trees, and plant life. The CPIO District covers Central Hollywood, which is already developed with a high concentration of buildings, hardscape, and other impervious surfaces. The CPIO has regulations that require shade trees in parking lots, and for non-residential projects that get increased development rights through the provision of Publicly Accessible Outdoor Amenity Space, the CPIO requires a percentage of open space with shade trees and landscaping. The CPIO also has requirements for landscaped buffers, in addition to required setbacks, for projects in the Regional Center CPIO subareas that abut properties that are zoned RD1.5 or more restrictive. The CPIO tailors the incentives of the TOC Guidelines and one of the incentives under TOC - reduction in open space requirements - is not an offered incentive through the Hollywood CPIO. Therefore, housing projects would still be required to provide on-site open space requirements for housing projects that create 5 or more units. These CPIO regulations aim to increase

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-19-2023.pdf (pg 60-61)	4/19/2023	United Neighborhoods for Los Angeles (UN4LA) (Attachment 3- March 17, 2021 letter)	GENERAL PLAN MONITORING REQUIREMENTS A search of the HCPU reveals that the words “monitor” and “monitoring” only occur four times, and only with regard to housing production and traffic. The HCPU ignores the General Plan Framework requirement for monitoring programs to assess development activity and its impacts on infrastructure and public services. The HCPU is inconsistent with the Framework Element because it does not include mechanisms to ensure that new development will be supported by adequate infrastructure. Much of the water infrastructure in Hollywood is over 70 years old, and water main breaks are not uncommon. Parks have been underfunded for years and are severely degraded, while the proposed Hollywood Central Park is no nearer to completion now than when it was first proposed a decade ago. LAFD resources are strained due to the region’s increasingly long and destructive fire season. Due to the current debate over law enforcement funding, it is difficult to project how LAPD will serve the area in the future, especially with increased population projected by the Plan. In general, the HCPU fails to comply with the Framework requirement for monitoring of infrastructure and public services.	See Director's Memo to PLUM dated 4/18/23, specifically Section IV. Framework Element Reconsideration and Supplemental Findings (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
https://clkrep.lacity.org/onlinedocs/2021/21-0934_CIS_04202023080421_1_04-20-2023.pdf (3 pages, entire pdf)	4/20/23	Community Impact Statement - Los Feliz NC	Not in support of the Plan for following reasons: Don't support reclassification of Vermont Ave. (from Los Feliz to Hollywood) from a Comprehensive Transit Enhanced Network to a Moderate Transit Enhanced Network. Also want Finley Ave. to be reclassified from a Collector Street to a Local Street so it could qualify as a Slow Street. Hyperion AVenue also should have been reclassified as an Avenue III instead of an Avenue II. Missed opportunities to address high injury networks on Hillhurst, Vermont, Franklin and Hollywood Blvd. Also want the plan to address SF zones, more tenant protections, CUPs for hotels, allow by right affordable housing projects in HWD.	The Plan reclassified Vermont Ave. b/c to Moderate Transit Enhanced Network due to the character of the roadway along this portion of Vermont so as to provide mixed-flow bus and vehicular lanes instead of a bus only lane to preserve on-street parking for the adjacent commercial uses. This designation, however, wouldn't preclude Metro from installing a bus lane - the enhanced network designations are meant to be as guidance. Bus lanes (and dedicated bike lanes, for that matter) can still be installed on streets where the enhanced network designations doesn't call for it. Finley Avenue is an appropriate Collector Street because it facilitates cross neighborhood traffic and again this designation wouldn't preclude future street calming measures (speed humps, chikans) that are meant to facilitate comfortable bicycle and pedestrian access. As for Hyperion Ave. - the roadway is already 60 feet and Avenue III calls for a street width of 46 feet so the Avenue II designation for Hyperion is more appropriate.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-	4/20/23	Kristin Leuschner	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	

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2023.pdf (pg 1)			Rolling back years of earned historic building protections in the “redevelopment repeal” Ordinance is buried in the Plan, and is completely unnecessary.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 2)	4/20/23	Toni Gurbel Tinkelman	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 3)	4/20/23	Wendy H Kaiser	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 4)	4/20/23	Timothy	It is critical that protections for our historic resources are included in this plan. Please consider the changes that Hollywood Heritage is proposing. This is a once in a lifetime opportunity to protect the history of this special and unique neighborhood .	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 5)	4/20/23	Unknown	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 6)	4/20/23	Laura Dupuis	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 7)	4/20/23	Unknown	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			CPIO affordable housing density bonus incentives should be in effect where there are	
			The City's economic study says they can work-in the lower density areas east of central Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 8-38 of pdf)	4/20/23	Heritage Properties This is an email and it includes the DEIR comment letter (This is the same letter as DEIR Comment Letter No. 23) as an attachment.	Heritage Properties submitted a review of the DEIR to City Planning which was not accurately reflected in the FEIR in our opinion, so we are resubmitting it herein. The EIR dates from before the redevelopment obligations were transferred from CRA to Los Angeles. CRA had been handed a large proportion of responsibility for identifying and protecting historic buildings, having obligations for 35 years, before transferring ALL those obligations back to City Planning.	
			This HCPU EIR didn't factually analyze the repeal of the redevelopment plan itself,--which is an Ordinance embedded in the HCPU	See the Redevelopment Plan Consistency Findings section (starting on page F-1) in the Staff Recommendation Report, Exhibit A of the PLUM Transmittal to Council. https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_11_08-11-21.pdf, and Chapter 4.0 (Additions and Corrections) of the FEIR.
			Nor did it factually analyze the CRA Plan mitigation measures, and the loss of them. CRA did not agreed to cancel all historic building protections and all the design, traffic and other workings and obligations of the Plan. The DEIR is deficient because • the underlying Plan does not deliver on the stated goals, and the project described verbally is not the project delivered in the operative parts, • the DEIR sections "throw up their hands" in Appendix M and throughout, resorting to a Statement of Overriding Consideration instead of doing the needed analysis and mitigation measures required by law.	See Appendix M (Inventory of Mitigation Measures) of the DEIR, which includes an inventory of the Hollywood Redevelopment Project EIR Mitigation Measures and details about the rationale for deleting the mitigation measure and the impact of removing it.
			The legally-required elements of the Community Plan are not internally consistent in accordance with State law;	The commenter has not provided any substantial evidence to support this claim.
			The environnmentally superior alternative is the "No Project environnmentally superior alternative is the "No Project Alternative" Loss of historic buildings is brought on by 3 things: by conflicting zoning, which incentivizes demolition when land is worth more than the buildings on it; by poor alterations, when stunning landmarks are remuddled – often unintentionally—because there is no design review process in place; and by incompatible new construction—generally out of scale, over-height, and often hostile to pedestrians and the humane existing environment.	The No Project Alternative does not meet the identified primary or secondary objectives of the Project and therefore can not be considered as the environmentally superior alternative. See Chapter 5.0 (Alternatives) of the DEIR.

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			The major threat in this HPCU for Hollywood's historic buildings is from upzoning, which is proposed in roughly 69 of 88 subareas of this 2018 Land Use Plan and zoning, combined with areas which are already zoned in conflict with historic buildings and neighborhoods.	
			The Plan is supposed to be based on a population growth projection of about ½ of 1% of new people per year. From the current 208,000 dwellers, the expected growth is to 226,000 people. • The court case in 2014 rejected essentially the same Land Use Plan as being proposed now, with the same buildout capacity calculations missing, and with a similar odd reasoning and outdated population figures, with a Plan Text and EIR as "fundamentally flawed."	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
			because the Land Use Plan was largely created, circulated, cemented, and rationalized years before the population projections were fixed, there is literally no way to make the actual population growth consistent with this proposed Land Use Plan. •	
			The existing 1988 Hollywood Community Plan brought growth near transit and met most of the current 2018 Plan Goals—except that it did not meet historic preservation goals. This Plan and DEIR failed to address that conflict and thus to explore genuine ways to save historic Hollywood from the wrecking ball. It is NOT necessary to "destroy the village in order to save it."	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 8-38 of pdf)	4/20/23	Heritage Properties - Section 1 This is the same letter as DEIR Comment Letter No. 23	So the result of this HPCU was expected to be terrific progress for Los Angeles, but even an early reading of the Land Use Plan and the DEIR sees that this Plan is a giant step backward for preservation. The DEIR's comprehensive and detailed listings of historic landmarks was apparently prepared long after the-fact of the Land Use Plan and zoning. This identification is followed by a shocking statement, literally that it is too much trouble for the City to do anything proactive beyond what it does today to protect this rich collection of buildings and districts. So unfortunately it will likely be lost.	Response is included in the FEIR Response to Comment 23 on Pages 3-129 through 3-135 of the FEIR, which references to Master Responses No. 1 (general Comments and Non-CEQA Issues), No. 2 (Population, Housing, and Employment) and No. 3 (Historic Resources)
			The major threat in this HPCU for Hollywood's historic buildings is from upzoning, which is proposed in roughly 69 of 88 subareas of this 2018 Land Use Plan and zoning, combined with areas which are already zoned in conflict with historic buildings and neighborhoods. T	
			The Plan is supposed to be based on a population growth projection of about ½ of 1% of new people per year. From the current 208,000 dwellers, the expected growth is to 226,000 people.	
			A court case in 2014 rejected essentially the same Land Use Plan as being proposed now, with a Plan Text and EIR as "fundamentally flawed."	
			Land Use Plan was created, circulated, cemented, and rationalized years before the population projections were fixed, there is literally no way to make the actual population growth consistent with this proposed Land Use Plan.	

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			The existing 1988 Hollywood Community Plan, still in effect now, had a conservatively calculated Plan capacity of 272,000 persons. Thus, as explained below, the existing Community Plan has almost double the capacity to house the expected growth in both commercial and residential properties, without inducing new harm with the 2018 Land Use plan to historic buildings.	
			The existing 1988 Hollywood Community Plan brought growth near transit and met most of the current 2018 Plan Goals—except that it did not meet historic preservation goals. This Plan and DEIR failed to address that conflict and thus to explore genuine ways to save historic Hollywood from the wrecking ball.	
			The DEIR—in order to support statements about community preservation—must map, illustrate, and clarify where and why these lengthy urban design requirements are attached to the zoning of particular parcels.	
			The rationalizing of the Land Use Plan with strange population methodology in the DEIR is deceptive, but also in error. Housing and commercial construction has outpaced all the projections of the 1988 Hollywood Community Plan for a list of reasons—which are quantifiable, analyzable, knowable, and needed to be presented in the DEIR. Many many parcels in the Land Use Plan, including a few purported to be downzoned, have been built on since 2016 at greatly increased densities.	
			Housing construction in Hollywood is now in large quantities on commercial and even industrial properties, whereas the 272,000 plan capacity in 1988 was calculated on residential properties only	
			Discretionary actions by the Council overshoot even this 2018 Land Use Plan. Individual projects are often given 2x -5x 1988 Plan and even 2018 Plan zoning densities, creating lopsided, unplanned development scattered through Hollywood.	
			TOC local law and granny flats local laws; SB 1818 density bonus housing: and a misinterpretation by the City of Zoning Code 12.22.A.18 (a Zoning Administrator interpretation allowing doubled density without environmental review) add up to immense pressure to demolish historic buildings and greatly accelerated housing production.	
			Our conservative calculation is that the actual population capacity of the Hollywood Community Plan in 2040 is 330,000 people, based on the 1988 Hollywood Community Plan. As unpalatable as this discussion is, it is accurate.	
			Blueprint for near-total loss of landmarks: However, the Hollywood CPU Land Use Plan and zoning is actually a blueprint for near-total loss of Hollywood’s historic resources. “Loss” is both from demolition—usually incentivized by zoning which makes scraped land more valuable that the building itself; by bad alterations—remodellings, additions, and other changes removing the features which made a building significant; and incompatible new surroundings.	

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			The DEIR states in Sec 5.3 under that “after implementation of all feasible implementation measures”, the adverse effect on Cultural Resources: Historical Resources is “significant and unavoidable.”	
			The DEIR states on Page 4.5-48 “No feasible mitigation measures have been identified”, citing the fact that no City or other ordinance (such as CHMs, HPOZs, etc or proposed CPIO) prevents demolition if projects go through proper review. “Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes to projects involving historical resources that are designated under the HCM or HPOZ, or subject to review by the proposed CPIO or SNAP, or other discretionary review. Based on the above, there is no feasible mitigation to prevent the demolition or substantial alteration of historical resources.” □ Translated, this means “the City” has decided historic buildings do not matter.	
			Conclusions backed by no analysis or effort to change adverse effects: In the Land Use Plan, zoning, and the DEIR, there is no apparent effort visible that Planning worked to direct or inventively regulate growth in Hollywood around cherished and spotlighted historic buildings.	
			First and foremost, the Land Use Plan and any regulations focus on new construction, in this heavily built out dense urban landscape.	
			Secondly, the Land Use Plan and zoning appears to miss the opportunity to bring to the richly endowed area such normal planning tools as adaptive re-use or measures to disincentivize demolition such as compatible additions to single family homes to increase density; parking relief; or requirements to maintain and reuse streetfront buildings contributing to a cohesive streetscape.	
			Conflict mapping with Green HPCU zoning subareas: Maps in Sec 4.5 show proposed HPCU subareas in green, overlain on the maps of historic buildings. There is no explanation or analysis. 90% of the proposed subarea zoning changes are upzoning, so the conflicts are likely huge, should have been highlighted, and real steps taken to correct the problem. Examples abound-- such as the Selma La Baig District, recognized as of National Register significance—an upzoning proposal on an already upzoned district.	
			No conflict mapping for 1988 Community Plan conflicts: The DEIR has no analysis of the existing Community Plan’s conflicts with historic buildings. This Community Plan was the golden opportunity to “catch” areas not identified for conflicts in 1988, and downzone or otherwise design control those areas to make for healthy communities and preservation.	

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			Silence on the Hollywood Boulevard District: It appears that the Planning Department intent was preservation-minded- to leave the current zoning limit of a 2:1 FAR for the central section of the historic Hollywood Boulevard District intact. However, the “D” condition was always tied to planning studies required from CRA. That work is being completed, and the consultant/City/ or CRA must be instructed to implement the 30% reduction written into the Redevelopment Plan to keep the allowable FAR at 2:1.	
			The conclusions of the Draft EIR on Cultural Resources; Population, Housing, and Employment; Transportation and Traffic , and other sections is not supportable. We find that there countless ways to plan for growth AND preservation, are many, many known and possible mitigations.	
			The DEIR is therefore deficient because:	
			the underlying Plan does not deliver on the stated goals;	
			the DEIR sections “throw up their hands” and fail to address how this disconnect between goals, legal requirements, and the proposed Land Use Plan can be resolved.	
			the legally-required elements of the Community Plan are not internally consistent in accordance with State law	
			a large number of Plan Elements, including Mandatory Elements under State law, show significant, “unavoidable” adverse impacts, instead of planning to minimize or remove impacts AND including EIR Mitigations to minimize them.	
			having a Preservation Chapter, which we recommend be officially recognized as an Optional Community Design Element under State General Plan law.	
			It appears that the Land Use Plan and zoning proposed is closely tied to the same Land Use Plan Judge Goodman rescinded in 2014, citing it as ‘fundamentally flawed” and rejecting the Land Use Plan, zoning, Plan Text, and FEIR. In the ensuing 4 years, it does not appear that any effort was made to integrate historic resources into the Land Use Plan; upzones ostensibly for transportation and sustainability reasons in direct conflict with certain State ordinances; and fails to attempt to mitigate the losses.	
			ENVIRONMENTALLY SUPERIOR ALTERNATIVE IN EIR IS THE NO DEVELOPMENT ALTERNATIVE:	
			Population projections are always the foundation of Community Plans, and the EIR wrongly manipulates the projections	
			It appears the entire housing need for Hollywood for the year 2040 has been met/is being met by current permits and entitlements	
			The current 1988 Community Plan has growth capacity far above anything needed for the year 2040	

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			Community Redevelopment Agency's responsibilities and obligations for historic preservation in Hollywood, and potential transfer of obligations to City Planning, are omitted and glossed over: The HPCU and its EIR gloss over 30 years of planning history in the central 1,107 acres of downtown Hollywood by dismissing the long standing activities of the CRA. The EIR fails to mention that the CRA	
			CPIO is unfinished, but as offered it is a giant step backward for historic preservation: The Community Plan offers a CPIO in the Hollywood Redevelopment Area.	
			Mitigations are Possible, Required by California law to be implemented , but omitted from 2018 HPCU DEIR: The DEIR states in Sec 5.3 under that "after implementation of all feasible implementation measures", the effect on Cultural Resources: Historical Resources is "significant and unavoidable." No Mitigation Measures are offered!	
			Disconnect with the Draft Community Plan Text: The Draft Community Plan text implies the opposite of the EIR. There is a robust, engaging chapter focused on the history of Hollywood, stating goals for preservation, with policies to identify and protect the priceless cultural treasures of Hollywood .	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 8-38 of pdf)	4/20/23	Heritage Properties - Section 2, was also part DEIR Comment Letter No. 23	Our Section 2 reviews the goals, policies, and implementation measures. Given the dire situation already in Hollywood, we recommend a proactive push to get these and other implementation measures baked into the Community Plan and its zoning before presenting this to the Planning Commission.	
			Disconnect with the Mandatory Community Plan Land Use Plan: One part of the HPCU -- the only part which will be adopted and turned into a City Ordinance -- is the Land Use Plan with the proposed zoning.	
			HPCU Plan Goals- what implementation?	
			P 1.1 Significant neighborhoods and districts.; Note: p30- Sunset Square HPOZ is adopted; CPIO Prior to Plan Adoption—Add Vista del Mar, Ivar Hill. Colegrove, Hollywood North Multifamily, 1700 Hudson, etc Connect to CRA Redev Plan	
			P 1.2 Adaptive reuse. ; Unclear actions and timing;	
			P 1.3 Designated and potentially significant resources; No implementation process or specific timing; Prior to Plan Adoption— extend CHM protection to all National Register properties (Ken says this is already being done?) list all buildings required in 1990 as HCMs now	
			P 1.4 Buildings in FAR Incentive Areas.: No implementation process; Connect to CRA Redev Plan or specific timing	
			P 1.5 Distinctive street features; DCP/BOE/DOT Clarify and report existing process and procedures, No process or timing proposed; Add significant streetscapes— Cahuenga, etc, as identified by CRA survey	

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			P 1.6 Study preservation tools; No policies or implementation provided; Commit to neighborhood protection—develop excellent tools and include Extend CPIO to residential neighborhoods Connect to CRA Redev Plan	
			P 1.7 Preserve designated resources; Add Preservation Brief #14 Follow up on conflict mapping- evaluate, create new Land Use and zoning controls parcel by parcel or some other way?	
			P 1.9 Land use and zoning; No process or timing proposed; Revise all proposed land use designations due to conflicts Hollywood Core Transition by CRA affects Afton Place Hollywood Boulevard most important National Register District Require use of Preservation Brief #14 Extend HPOZ protections and procedures immediately. Prohibit parcel assembly Strong development limitations and override of TOC needed urgently.	
			P 1.10 Height limits; Study heights at Sunset and Western prior to adoption.	
			P 1.11 Financial resources; Commission economic study	
			P 1.12 Documentation; Improve public access through upgrades to ZIMAS etc.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 8-38 of pdf)	4/20/23	Heritage Properties - Section 3, was also part DEIR Comment Letter No. 23	How to Integrate Long-standing CRA Obligations for Historic Buildings Into City Planning Obligations	
			Current CRA Mandates to Identify and Protect Historic Buildings:	
			CPC 86-835 GPC Cultural Heritage; City failed to list.	
			Redev Plan— CRASec 511; Listing/Public Information:	
			Redev Plan— CRASec 511; Protection requirement- delay of any kind of permit/ delay of demolition:	
			Redev Plan— CRASec 511; Scorched Earth- bonus denial:	
			Redev Plan CRA 2003 EIR; Listing/Public Information:	
			CRA-HHI Settlement; Protection requirement- delay of any kind of permit/ delay of demolition:	
			Current CRA Mandates for Design Review of Alterations, Heights and Density, and Effects of New Construction	
			Redev Plan—CRASec 409: Design Review	
			Redev Plan—CRASec 505.4 and 506.3: Design/permit review:	
			Redev Plan—CRASec 506.2.1 Design Review:	
			Redev Plan – CRA Sec 407.1.4 Design Review: All development plans (whether public or private) shall be subject to review and approval by the Agency	
			Redev Plan- CRA Sec 505.1 Design review for any project exceeding 80 du/acre	
			HHI Settlement Agreement B3 Follow 1993 Urban Design Plan“	
			Mitigation Measures for HPCU EIR	

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			Redev Plan CRA 2003 EIR EIR review: Projects proposed in proximity to a cultural resource “the Agency will require a study to be made by a qualified architectural historian to determine whether the proposed development would result in substantial adverse change in the significance of the historical resource	
			Redev Plan 2003 EIR Design Review Mitigation Measure: “In order to not report any significant effect under CEQA, the mitigation measure states “Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations”. This restates the requirements in the Redevelopment Plan	
			Mandated CRA Obligations re Incentives/ Affirmative Actions/ Land Use Limitations	
			Redev Plan—CRA; Sec 505; Planning: Any residential area with architecturally or historically significant structures may be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve structures	
			Redev Plan – CRA ;Sec 505.3; Limits on Housing Incentive Units: Agency will limit housing incentive units	
			Redev Plan—CRA; Sec 511; TDRs “The Agency shall promulgate procedures for such transfer proposals ….(and shall) obtain adequate assurances that the building from which the density transfer is taken are preserved and the development on the site to which the density is transferred will occur in conformity with the Redevelopment Plan, the objectives of special districts as established by the Plan and if applicable, any adopted Design for Development”	
			Redev Plan—CRA; Sec 506.2.3; Monitoring traffic: Required to make annual reports on buildout of FAR in Regional Center relative to traffic metrics; required to review all density increases above 4.5:1 and when Regional Center density reaches 2:0:1 FAR to establish specific methods and mechanisms to acquire open space or otherwise restrict or decrease density	
			Redev Plan—CRA; Sec 518 and 518.2; Transportation Planning: Plan required, including planning to ameliorate undersupply of parking in Hollywood Boulevard. Agency to monitor off street parking supply	
			Are Current City Planning Mandates for Identify/Protect Historic Buildings in 2018 Draft Community Plan EIR?	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf	4/20/23	Heritage Properties - Section 3, was also part DEIR Comment Letter No. 23	City Planning Affidavit; Hold on demolition: Planning agreed December 16, 2016 with Hollywood Heritage that they can and will institute an Affidavit Process—Applicants will be required to sign a statement indicating “This permit (including every demolition permit) request is not a part of a larger project.” . This is to stop the common practice be certain developers for piecemealing, which violates CEQA.	

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(pg 8-38 of pdf)			Cultural Heritage Ord; Listing/Public Information/ Protection requirement: Listing of Cultural Heritage monuments (mapped on Navigate LA); Building permit review for alterations. Possible delay of demolition	
			HPOZ; Listing/Public Information/Protection: Listing of single family neighborhood HPOZs outside of Redevelopment Area.	
			HPOZ's under consideration; Listing/Protection: Listing of new single family neighborhoods proposed outside of Redevelopment Area	
			Comm Plan 1986; Protection: TDR and preservation as justification for 6:1 FAR	
			Comm Plan 2012; Protection: (Areawide) "D" Conditions on parcels with historic buildings	
			Listing/Protection - City Planning and LADBS: Development permit processing, monitoring, enforcement, and periodic revision of regulations and procedures - Element: Prepare the Historic Preservation and Cultural Resources Element of the Community Plan - Identify: Continue to survey buildings and structures… including context HPOZs; Not yet reintegrated into the Plan Text especially recognition of Redevelopment Plan resources	
			2018 Comm Plan; DEIR Listing/Public Information	
			2018 Comm Plan;DEIR Conflict Mapping, Analysis, and actions to reduce impacts; Yes-some conflict mapping No – Analysis and actions	
			What are additional Mitigation Measures possible for the 2018 HPCU, in addition to adopting all of the CRA protections	
			Clarify public benefits: The cornerstone of CRA's authority for discretionary approval of high densities in the 2005 Redevelopment Plan is intended to be twofold: traffic and parking mitigations, and a Transfer of Development Rights Program. City Planning cannot approve discretionary higher densities without providing the public benefits which are critical to the Hollywood Community.	
			New Historic Preservation Overlay Zones CRA surveys over the years identified specific historic residential districts. These CRA districts should be reflected as potential HPOZ areas in Community Plan mapping and the EIR. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.	

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			Historic Cultural Monuments The Hollywood Community Plan adoption by the City Council in 1986 required that roughly 100 National Register and other listed historic buildings be forwarded by CRA to the Cultural Heritage Commission for listing as HCM's at the City, and for notification of the CHC in the event of proposed demolitions. CRA met its obligation and City Planning did not implement. The EIR must reflect this current non-compliance. The City agre	
			Mapping of "protected" historic buildings, and notification of planned demolitions: There is a currently-adopted list of CRA buildings, with Status Codes 1-4 protected by the Hollywood Redevelopment Plan, including recognition of these buildings in EIRs. These addresses must be transferred, mapped, and protected by City Planning and reflected in the EIR. In addition there is an interim procedure set by judicial action wherein Hollywood Heritage is consulted on planned demolitions for Status Codes 1-6 within the Redevelopment Area.	
			Interim Control Ordinance immediately: The Hollywood Boulevard National Register Commercial and Entertainment Historic District will need an ICO to give the Planning Department time to follow up on the court-mandated CRA Urban Design Plan, and to work to conform the zoning categories with current protections. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.	
			Prohibition of Demolition Step two	
			What are the CRA current Plans being prepared that are going to have implementation by City Planning in the future?	
			Franklin Avenue Design District Plan, Redevelopment Plan Reqts: Sec 505.2: "a detailed design plan …which addresses preservation of architecturally and historically significant buildings, parking, circulation, views…"	
			Urban Design Plan Hollywood Boulevard Historic District Redevelopment Plan Reqts: Sec 506.2.1 and 518.2; "urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives..All new development in the District shall meet the design guidelines..may include a reduction of density"	
			Hollywood Core Transition District Development Guidelines Redevelopment Plan Reqts: Sec 506.2.2.: "properties…shall be given special consideration due to the low density..provide for a transition in the scale and intensity of devt" Redev Plan Sec 506.2.2 "The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods."	
			Transportation and Parking Standards Ordinance	

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			Updated Cultural Resources Survey; Settlement Agreement Req't: "maintain consistency with Survey LA and its definitions…recognizes that integrity may be evaluated differently in Hollywood area due to rarity, property type"	
			Redevelopment Plan Req't: Publicly available list ; Settlement Agreement Req't: Publicly available list "uploading to CRA website is acceptable" "a printed version of the Section 511 list shall be provided to members of the public on request and at reasonable copying charges". Background: Preservation.lacity.org\SurveyLA findings and reports\Hollywood\Hollywood Redevelopment Project Area Property Index	
			Density Transfer Procedures (to incentivize preservation) Redevelopment Plan Reqts Settlement Agreement Reqts:	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 8-38 of pdf)	4/20/23	Heritage Properties - Section 4	Plan Capacity in existing 1988 Community Plan- 330,000 persons	
			P 1.1 Significant neighborhoods and districts. DCP commitment to timing Note: p30- Sunset Square HPOZ is adopted CPIO Prior to Plan Adoption—Add Vista del Mar, Ivar Hill. Colegrove, Hollywood North Multifamily, 1700 Hudson, etc. Connect to CRA Redev Plan	
			P 1.2 Adaptive reuse.	
			P 1.3 Designated and potentially significant resources; No implementation process or specific timing; Prior to Plan Adoption— extend CHM protection to all National Register properties list all buildings required in 1990 as HCMs now	
			P 1.4 Buildings in FAR Incentive Areas; DCP No implementation process or specific timing	
			P 1.5 Distinctive street features; DCP/BOE/DOT Clarify and report existing process and procedures, No process or timing proposed. Add significant streetscapes— Cahuenga, etc, as identified by CRA survey	
			P 1.6 Study preservation tools; How? No policies or implementation provided; Prior to Plan Adoption— Commit to neighborhood protection—develop excellent tools and include Extend CPIO to residential neighborhoods Connect to CRA Redev Plan	
			P 1.7 Preserve designated resources. Prior to Plan Adoption— Add Preservation Brief #14 Follow up on conflict mapping- evaluate, create new Land Use and zoning controls parcel by parcel or some other way?	
			P 1.8 Complementary design. Prior to Plan Adoption— Connect to CRA Redev Plan Hollywood Blvd Urban Design Plans, etc Add Preservation Brief #14	

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			P 1.9 Land use and zoning; Prior to Plan Adoption— Revise all proposed land use designations due to conflicts Hollywood Core Transition by CRA affects Afton Place Hollywood Boulevard most important National Register District Require use of Preservation Brief #14. Extend HPOZ protections and procedures immediately Prohibit parcel assembly Strong development limitations and override of TOC needed urgently	
			P 1.10 Height limits.	
			P 1.11 Financial resources. Commission economic study	
			P 1.12 Documentation. Ongoing Improve public access through upgrades to ZIMAS etc	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 39)	4/20/23	Carolyn Mohr	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. P	
			Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	The Cultural Heritage Commission's suggested modifications to the CPIO, including further protections for contributing historic resources by applying expanded demolition review provisions in the CPIO and adding 5S3 Status Code properties under the definition of "Eligible Resources," were included in the Director's Memo to PLUM as one of the modifications for Council's consideration. See the Director's Memo to PLUM dated 4/18/23 (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 40)	4/20/23	N. Baker	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			Back the recognition of our world-renowned treasures with real action now, not sidelined to “goals” or “future implementation.”	
			Change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-	4/20/23	Alonso Duralde	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	

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2023.pdf (pg 41)			Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 42)	4/20/23	Joanna Ramos	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 43)	4/20/23	Mitchell Bullock	Please don't raze Hollywood's historic buildings!	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 44)	4/20/23	Unknown	Please do not destroy Hollywood Heritage. The City brings in so much business from all over the world to see the great Hollywood. Hollywood is the history of America. Don't destroy a national institution.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 45)	4/20/23	Mary Meyer	I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission that further protection for historic buildings are essential. Not a single historic building or district needs to be lost to meet the housing goal set forth in this Plan	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 46-60)	4/20/23	Fran Offenhauser	1. Fatal planning procedure flaws 2. Nothing new or good for affordable housing 3. Historic landmarks targeted for demolition 4. EIR – real impacts avoided and concealed 5. Public silenced and public benefits removed 6. City's own Housing Element and other figures show HCPU math is wrong I have identified "fixes"	
			Zoning Changes (Exhibit D and E)- Matrix of parcel-by parcel zoning Ordinance changes, including wholesale removal of :D" and "Q" conditions imposed in 1988 for environmental compliance. Extraordinary amounts of RSO housing and of historic landmarks are targeted for demolition without any recognition that they are even present on these targeted parcels	

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			CPIO (Density Bonus zoning) (Exhibit F): A 94 page “tool” trying to prompt private developers to include affordable housing in their projects, while the City’s own economist says it won't work where it has been located.	
			Redevelopment Plan Repeal Ordinance (removal of protections for historic buildings transferred to CRA and back to DCP in Nov 2019) (Exhibit D) : Repeals and muzzles citizen involvement; removes required infrastructure improvements; removes mandatory findings and public benefits; repeals desperately needed urban design; repeals desperately needed traffic studies. This is THE most damaging part of the HCPU.	
			EIR Mitigations: These are legally mandatory measures. The EIR is shockingly thin on Mitigations, even retracting measures already in place. Analysis is skipped- EIR just jumps to a conclusion in hopes that saying the Plan has adverse effects will moot any later objections. This is the same EIR error made in 2012 when this Plan had to be rescinded due to Planning Dept procedural errors. You are asked to irresponsibly adopt a Statement of Overriding Consideration while violating 13 EIR sections. The EIR is fatally flawed.	
			The CPIO “magic” just replaces TOCs. It’s a convoluted twisty set of rules that cannot be clearly explained for Council to even vote on.	
			To produce affordable housing it doesn't work financially, according to City Planning’s economist. On average, 5% of new “density bonus” housing is “affordable”. The City purports to be pursuing a 40% goal. Because of the defunding of low income housing by the State and Federal government, zoning is looked for as a panacea, but the single most sensible move in Hollywood is to move the affordable housing CPIO to where it will work—East Hollywood.	
			Where growth should be channeled. Force Feeding growth into central Hollywood is like overloading a ferry, and forgetting that another ferry is right there. All the areas needed for growth were identified by Hollywood Heritage, with many many missed by the Terner Center. Most importantly, the quantity of buildout for the Plan was never calculated—a fatal flaw,.	
			Housing production is realistically already happening-without upzoning making costs shoot up: Hollywood was exempt from Prop U, and has had high density zoning and masses of housing entitled and built. In this HCPU the City fails to use its own extensive data, which shows that 32,000 +/- housing units “needed” for 2040 are ALREADY built, permitted, or entitled in Hollywood during the Plan process (2016-2021 data).	
			Community Plan Update upzoning is NOT needed.	
			Recommendations re reversing plan flaws	
https://clkrep.lacity.org/o	4/20/23	Fran Offenhauser	Cancel the repeal of Redevelopment Plan protections (Exhibit D- page 340-342):	

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nlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 46-60)		(continued)	Revise CPIO map (CPIO Exhibit F) If CPIO has merit. Show that the Hollywood Boulevard Historic District is the full length from El Cerrito to Gower, not cut down to 1/3 its size as shown in CPIO. Expand demolition protections and allow added FAR to be transferred out, but not used on site unless it can coexist with current landmark. Or MOVE CPIO to an appropriate location— East Hollywood for example-- Out of historic areas and into lower d	
			Failure to calculate buildout capacity. Remand FEIR to make compliant (Exhibit G); Revise Plan Text (Exhibit D)	
			Failure to address real and modern planning issues: Failure to address real “on the ground” issues areas especially on Hollywood Boulevard: to update and improve Adaptive Reuse; to monitor City progress re parking deficit and garage construction and operation; to marshall City services and improve façade alterations; to analyse Heart of Hollywood for traffic, loading, and other impacts, to address genuine sustainability; to insure public realm is not downgraded by new construction	
			Correct Matrix (Exhibit E) Retain current D and Q Conditions	
			Condition all changes in the Zone Matrix Exhibit E: Increases should be only attainable with either specified public benefit or specified affordable housing . Identify all historic resources and RSO building parcel by parcel. Turn “talk” into action	
			General Plan Amendment proposed in HCPU to avoid complying with General Plan (Exhibit C) Violates City of Los Angeles “growth neutral” General Plan Framework. Changes General Plan Regional Center boundary”.Withdraw Amendment	See Master Response 2 - Population, Housing, and Employment in the FEIR.
			Nothing new or good for affordable housing	
			Require RSO mapping in Matrix Exhibit D: Require parcel by parcel data to include whether a parcel has RSO units. Map proposed upzoning on RSO parcels as proposed in HCPU, and in Housing Element . Deny demolition of RSO housing- “scorched earth” 5 years Delay RSO demolition until building permits Ready to Issue Add anti-displacement language per Harris Dawson	
			Add strengthened Ordinance requiring and specifying monitoring of affordable units; ensure they maintain affordability- building permit evidence is insufficient. Specifically require data separated for HCP area	
			Re-analyze replacement economics and revise Plan zoning so replacement will work. This is a fundamental issue : Don’t accept that affordable housing can’t be replaced 1:1. Change the Plan-- -Move incentives to area where replacement does work There are answers- if the new construction in high density areas is too expensive, demolition of RSO housing is wrong. Don't accept the illusion of progress. -promoting Community Plan. Require the mapping and the data	

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			Add the union requirement language from TOCs back in (CPIO Exhibit F text- for all projects) This is not our knowledge area. Union canceling may not be the goal, but it is the effect of getting rid of TOCs .	The union requirement is part of Measure JJJ and not part of the TOC Guidelines. Future zone changes would be subject to Measure JJJ and its union requirements as well. The CPIO does not conflict with these requirements of Measure JJJ nor does it change the requirement.
			Density bonus program is financially infeasible in central Hollywood according to City Planning economist HR&A CPIO financially unfeasible where it is located-- inflated land costs, and high cost building type	
			Reduces amenities and infrastructure requirements for luxury housing moving burden on to taxpayers. Zoning Matrix (Exhibit E)- Condition all zoning increases on provision of affordable housing. No more giveaways (Valued from $20 mil or 1540 Wilcox to $120mil for Crossroads), landing the burden on the taxpayers, traffic, etc for luxury projects.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 46-60)	4/20/23	Fran Offenhauser (continued)	Historic landmarks targeted for demolition	
			List of historic buildings and districts in Plan and EIR wrong, incomplete, inconsistent, outdated. Appendix L incomplete, out of date, inconsistent etc. Remand EIR Sec 4.5 Cultural Resources Remand EIR Appendix L Correct Plan Text Exhibit C, maps 4.9-5f et al: So many errors cannot be cited here. Hollywood Heritage has separately written a white paper on how to correct all the errors.	
			Repeals long standing, critical existing historic protections—such as using Secretary of the Interior Standards—and replacing them with verbal “goals “ which have no operative meaning Cancel the repeal of Redevelopment Plan protections (Exhibit D- page 340-342):	
			Locates Hollywood Boulevard National Register District wrong: Despite contacting City Planning repeatedly, their error was not corrected reducing a national register District listed at CPIO Exhibit F corrected- both the stated location of the Hollywood Boulevard District, and its treatment	
			Targets most historic part of Hollywood for demolition-- Footnote Matrix Exhibit E Retain D Conditions specifically for sites of National and California Register properties, including all District properties; require Urban Design Plan and Transportation coordination	
			Prohibit demolition without investigation within National Register boundary CPIO (Exhibit F) – Delete Director Authority to override CEQA; require investigation of all non-contributors in Districts	New demolition protections for historic properties was addressed as an optional modification to the CPIO for Council's consideration in the Director's Memo to PLUM dated April 18, 2023.

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CF Document Link	Date uploaded to CF	From	General Summary of Comments (*see the linked letter for the full comments as this column represents a very general summary)	Response
			Prepare District character-defining features to assist Planning Department staff in evaluating proposed entitlements and permits within National and California Register Districts CPIO (Exhibit F) – Insert Distinct character defining features prepared by Hollywood Heritage into HCPU	
			SurveyLA properties identified as “eligible” in EIR, with zero action, protection Plan footnote add: Apply to all SurveyLAidentified properties: All permits and entitlements affecting parcels with SurveyLA identified properties shall be referred to OHR	
			EIR – real impacts avoided and concealed	
			Fatal flaw: EIR defaults to “significant adverse effect” for 13 Plan Elements without ever assessing data: I. 13 elements – of which _land use is REQUIRED to be coordinated and consistent with housing AND with traffic, conservation, open space, noise, safety, environmental justice, and air quality II. These are not clarified or quantified III. Jumping to “significant adverse effect” without analyzing what effect the	
			EIR circulated PRIOR to CPIO- new 94 page complex density bonus system no environmental review of key section of HCPU	Additional discussion of the draft CPIO that was released after the DEIR was included in Section 2.0 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects) of the FEIR.
			Outdated- 2016 data-fails I. Failure to calculate actual growth from ADUs, housing built in commercial areas since 1988, housing entitled thru discretionary actions etc growth	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
			Failure to include current Mitigation Measures now in force- - Redevelopment Area EIR mitigations cannot be eliminated without notice of specific adverse effect, as these are in force now	See Appendix M (Inventory of Mitigation Measures) of the DEIR.
			FEIR failure to update from 2016: 7,000 already-built housing units discounted as “vacant” to make effects “go away”. FEIR says no change from 2016 data to present because 7,000 housing unit as are vacant!!!	See Chapter 2 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects) and Master Response No. 2 (Population, Housing and Employment) in the FEIR and see the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
			Failure to meet fundamental obligation of a Community Plan-- calculate infrastructure and public services: Water supply, power supply, waste removal. Emergency preparedness, stormwater, street lighting, parks and libraries.	
			Population methodology fails : Same errors and more as methodology in 2012	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-	4/20/23	Fran Offenhauser (continued)	Failure to quantify housing already entitled, built, or under construction: • All housing unit growth envisioned by the City Planning (264,000 persons) ALREADY built, permitted, or entitled since 2016 data in the Plan	

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2023.pdf (pg 46-60)			Failure to use data: Housing Element data does not corroborate City Planning HCPU land use plan. Housing Element includes 6X upzoning needed, as revealed on p 191 of the Housing Element. Proportional requirement for Hollywood CP not revealed if intended to vary for current proportion (7%) .	
			Failure to quantify needed commercial and industrial growth	
			Appendix M- fails: Calling 35 year laws “inefficient” not a reason to skip known Mitigation Measures and measures currently in force.	Appendix M notes all of the mitigation measures from the Hollywood Redevelopment Plan's EIR, the reasons why the Hollywood Community Plan Update will be deleting the mitigation measure, as well as the impact that removing the mitigation measure would have on the environmental impact categories. In instances where the City noted that the reason for deleting the mitigation measure was because it was inefficient use of City resources was due to the fact that there were already similar regulations in place.
			Appendix L fails: inaccurate data, inconsistent between text and EIR; out of date	
			Public infrastructure and public services not coordinated with growth moves burdens over to taxpayers: Water supply, power supply, waste removal. Emergency preparedness, stormwater, street lighting, parks and libraries	
			Public silenced and public benefits removed	
			CPIO cuts out public reviews--- leaves decisions up to City Planning—current neighbors cut out of decision-making CPIO (Exhibit F)- Delete sections granting authority to Director and add sections requiring public review.	The CPIO creates a review process for eligible historic resources for new construction or alteration projects that would have to meet the requirements of the Secretary of State requirements and be reviewed by OHR, and if the project does not comply then additional CEQA review, which could require the preparation of an EIR.
			Lowered quality of everything- remove requirements for parks, sidewalks, parking Require detailed annual inventory of public infrastructure..	
			Removal of traffic improvements responsibility for developers to provide traffic amelioration to offset effects of project’s construction Enforce Sec 506 and 518 of Redevelopment Plan	
			Identify and Protect Historic Districts	
			Why CPIO “affordable housing incentives” ONLY in historic center?	The housing incentives in the CPIO apply in areas of the CPA where most growth is anticipated. The CPIO housing incentives will supercede the TOC incentives. The TOC housing incentives will continue to apply in the areas of the CPA that are not within the CPIO.

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			No upzoning needed-- residential units supposedly “needed” in HCPU area for 2040 have been constructed, permitted, or entitled since DEIR preparation in 2016, based on data	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and See the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23
			The upzoned areas have the greatest concentration of historic building in Los Angeles outside of Downtown- I think the greatest number of restored historic theaters in the nation—this accurate map, however, is NOT in the EIR!	See Master Response No. 3 (Historic Resources) in the FEIR.
			City Planning has been reducing housing and hotel “giveaway” entitlements, and now TOCs and density bonus are increasing. But math of density bonus cannot provide 40% affordable housing in significant amounts without subsidy.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 61)	4/20/23	Luis Rodriguez	I support Hollywood Heritage, the Los Angeles Conservancy, and the City’s own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made.	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	The CPIO creates a review process for all eligible and designated historic resources. In the event that an eligible and designated historic resources is demolished or altered and it doesn't comply with the Secretary of Interior's Standards, additional environmental review would be required, which could result in the need to prepare an Environmental Impact Report.
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 62)	4/20/23	Don Roszkowski	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 63)	4/20/23	Katherine	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 64)	4/20/23	Joseph Guidera	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 65)	4/20/23	Unknown	I support Hollywood Heritage, the Los Angeles Conservancy, and the City’s own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made.	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 66)	4/20/23	Unknown	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	

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CF Document Link	**Date uploaded to CF**	**From**	**General Summary of Comments (*see the linked letter for the full comments as this column represents a very general summary)**	**Response**
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City's economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 67)	4/20/23	Joanna Linkchorst	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City's economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 68-69)	4/20/23	Ruth A. Poons-Geoghan	Concerns about upZoning. That upzoning also threatens Hollywood Historic Resources in The Regional Center/National Historically Designated part of Hollywood. I am submitting in opposition to "upzoning beyond planning staff recommendations" in the Regional Center and in support of protecting potential affordable housing to be built there, in light of having the worst humanitarian homeless crisis in the country, and I support protecting Hollywood Historic Resources	
			I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission. Specific changes missed by City Planning should be made	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City's economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 70)	4/20/23	Terry Carter	I support Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission's proposed alterations to the Plan..... Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	

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CF Document Link	**Date uploaded to CF**	**From**	**General Summary of Comments (*see the linked letter for the full comments as this column represents a very general summary)**	**Response**
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 71)	4/20/23	Lauren Lexton	I support the Hollywood Central Park, a deck park over the 101 within the Hollywood Community Plan area. The Hollywood Central Park will create much needed open space, addresses environmental and social justice, and curbs the effects of the climate crisis. As a Hollywood Stakeholder, I request that you please vote to approve the Hollywood Community Plan Update as presented by the Department of Planning.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 72)	4/20/23	Cinzia Zanetti	I would like to urge the PLUM committee to revise the Hollywood Community Plan and consider suggestions proposed by Hollywood Heritage. It is essential that we preserve the history and character of Hollywood and not destroy what gives the city it's appeal to tourists and film buffs. Preservation is the foundation for a world class city.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 73)	4/20/23	Scott Tracy Griffin	I support Hollywood Heritage, the Los Angeles Conservancy, and the City’s own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made.	
			The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design.	
			CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings.	
			The City’s economic study says they can work-in the lower density areas east of central Hollywood.	
			Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 74-76)	4/20/23	Unknown	Please redact my email address. Dear PLUM Committee: Enclosed.	
			"LA County has the largest population decline in 2022, decreased by 90,704, continuing a downward trend as the state lost roughly twice that amount in 2021."	See the Baseline Population discussion in the Planning Director's Memo to PLUM dated April 18, 2023.
			Please find the enclosed 14-page document for your review and for inclusion in the administrative record. Includes newspaper clippings that talk about declining population.	See Master Response No. 2 (Population, Housing and Employment) in the FEIR and see the discussion on Baseline Population in the Director of Planning's Memo dated 4/18/23 in the Council File.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 77-91)	4/20/23	JG	Strengthen Historic Preservation to ensure our cultural and historic resources would be immune from destruction.	
			Please also note, the current version of the HCPU suggests Griffith Park and the Santa Monica Mountains are the city’s “open space”, insinuating there is no need for “open space” in Hollywood, or a need for views, or light, or more than an arms length in between buildings	

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			Our local wildlife and open space exists in Hollywood’s backyards and the remaining hillside areas, and in our local flora which is what defines our local ecosystems. Reducing setbacks even further compromises this biodiversity (Please see “increasing amounts of Los Angeles residents seek refuge from the surrounding city” The effects of future urban development on habitat fragmentation in the Santa Monica Mountains, Swenson et al., 2000). T	
			There are no protections for existing mature trees, parks, wildlife or the minuscule areas of open space in Hollywood that remain.	
			Removing historical resources, removing our open space thereby removing wildlife, removes residents from the city as seen again, in the latest census data showing Los Angeles had the LARGEST POPULATION DECLINE two years in a row since 2021	The Hollywood Community Plan Update is not removing designated open space, but rather it is rezoning some properties that are owned by the City or the Santa Monica Mountains Conservancy to open space. The Hollywood CPIO adds a review process for eligible historic properties with an aim to protect more historic resources.
			General concerns about ethics and civic representation and city corruption	
			Historic resources and potential historic resources need protection and must be off limits.	
			Protect and Preserve Historic Landmarks	
			Provide archival newspaper clips about city history (for reference)	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 92)	4/20/23	Toni Gurbel Tinkelman	Do not destroy any historic buildings, stop pitting housing production against preservation. Support the Hollywood Heritage's efforts it's recommending.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 93)	4/20/23	Angie Schneider	Do not destroy any historic buildings, stop pitting housing production against preservation. Support the Hollywood Heritage's efforts it's recommending.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 94-125)	4/20/23	Hollywood Heritage	The Draft EIR has adverse effects especially for the proposed upzoning within many historic districts.	
			The CPIO seems to cover all of the redevelopment plan area, but it really only captures just a portion	
			The CPIO only covers by right projects, as defined, but it should also clearly state it covers discretionary actions, EIR's, etc.	The CPIO does not only apply to by-right-projects. It provides an Administrative Clearance review for projects that meet all of the CPIO regulations. Discretionary projects, such as a project seeking a CUP, would still be required to comply with the CPIO regulations.

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			There's conflict when you try to incentivize for more affordable housing, especially when you are upzoning and trying to densify the plan area.	The CPIO creates a review process for eligible historic resources as a method to preserve more historic properties. There is currently only a process for designated resources, but not for eligible resources.
			The CPIO fails to mention groups like the National Register Historic District, Federal Standards, and the Hollywood Boulevard Urban Design Plan.	
			The CPIO fails to mention the plans for other historic buildings/districts outside of this plan area.	
			The new CPIO is omitting several key policies from its previous iteration, including downgrading the list down to only identifying 281 landmarks, but not including 511 listed properties from Survey LA. It also does not appear to cover the list generated by the National Register as part of those landmarks.	
			The CPIO also downgrades the non-contributing buildings and those should remain also also trigger CPIO review.	
			The CPIO does not pay as close attention to commercial buildings and calls to upzone those within that portioned area planned to be upzoned and these buildings need to be protected.	
			The CPIO misses protections on the Franklin Avenue Design District	
			The CPIO does not carry over the protections the CRA had on that 511 list	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 94-125)	4/20/23	Hollywood Heritage	Argues their understanding that demolition of non-contributing buildings in historic districts and new construction buildings that meet the Secretary of Interior Standards violates CEQA primarily because these non-contributing buildings need to be re-evaluated and new construction buildings still require OHR review.	
			6 Elements to key points in letter outlined:	
			* The 511 list from the National Register, CA Register, and Redev Area are missing	
			* The mapping of all individual historic buildings and historic districts	
			* Preservation Planning is not prevalent in all land use planning approaches	
			* Construction of historic buildings being reviewed by the Secretary of Int. Standards also need to be expertly reviewed by the HCM OHR and HPOZ	
			* 1988 Community Plan protections are not implemented in this current CPIO	
			* Missing environmental review	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf (pg 94-125)	4/20/23	Hollywood Heritage	Main talking points and recommendations outlined in table:	
			The table beginning on page 6 continues to reiterate previous points but mainly reiterates that the CPIO is missing the 511 list	
			Also reiterates that the CPIO does not cover the entire redevelopment area	
			Points out that resources available to the public to determine historic buildings, districts, their significance, etc. and that the City needs to update it's resources for consistency, i.e. ZIMAS, Navigate LA, ZI-2488.	

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			The context narrative found in chapter 5 is lacking and requires more substantive information	
			The existing maps are not correctly showing boundaries of the historic districts and some adjustments are needed.	
			Incentivizing affordable housing development is a form of upzoning, which they're against because of their goal to preserve	
			Add the Historic Maps overlay to the Land Use Maps	
			Find other ways to incentivize affordable housing development, such as pre-approval, parking waivers, change of uses, adaptive re-use	
			Franklin avenue design district is missing	
			Transfer of Development Rights - missing 3 core items: mapping the receiver sites, research proving what transferable rights are optimal, and that discretionary cases seeking additional FAR purchase (not be gifted) for public benefit.	
			The CPIO lacks regulations for properties designated city historic buildings	
			The CPIO states different treatment of surveyed resources in the Redevelopment Plan and Survey LA.	
			The CPIO should incorporate design regulations with inclusion items such as the Redevelopment Plan's regulations Section 409.I, Franklin Avenue Design District's Section 502,2, Section 506.2.I and 518 of the Hollywood Boulevard Urban Design Plans, and section 506.2.2 of the Hollywood Core Transition Plan.	
			Carry over the 1988 protections, including those federally listed	
			The CPIO requires full CEQA review of the entire area, including utilities, parks, open space, transportation, utilities, etc.	
			See attachments/exhibits starting on page 107 of document for the above referenced items/talking points.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-20-2023.pdf	4/20/23	Roberta Edwards	There are ways to accomplish need for more housing without destroying landmarks. Preserving Hollywood must be a priority.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_AM_04-21-2023.pdf	4/21/23	Unknown	Save our country's heritage. Hard to pass on heritage locations without their physical presence. Hooray for Hollywood!	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_04-21-23.pdf	4/21/23	Councilmember Soto-Martinez, District 13	As of today I am conditionally supportive of approving this Community Plan Update. For the HCPU before us today I am requesting both the co-presented CPIO changes already mentioned in the letters submitted on behalf of Council Districts 4 and 5 as well as several specific requests for the Regional Center Subareas I represent.	

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			Requested changes to the Community Plan Implementation Overlay (CPIO) co-presented with Council Districts 4 and 5 are as follows: • Additional Tenant Protections. • Covenant Terms. • On-site Affordability Requirements. • AB 2097.	
			Requested Additional Council District 13 Planning Tasks for Hollywood and East Hollywood Beyond the Hollywood Community Plan Update: Additional work needs to be done to accelerate the production of higher densities of housing, particularly affordable housing, prevent displacement and gentrification, and increase sustainability.My working vision for the required scope of the changes is as follows: - Affordable Housing Production: • Increase the housing and jobs growth objectives and densities for the core of Hollywood and East Hollywood, including using any and all tools developed under the Re:code program. • Add a mandatory onsite affordable housing program to all housing projects in the update area, while providing by right cost offsets such as waiver of linkage fees, reduction in parking requirements and increased project streamlining for both CEQA and discretionary approvals to support the production of housing. • Re-define the land use for publicly owned land so that public sites are free to develop housing by-right at the highest densities available in the City to spur faster production of affordable housing at City owned properties. • Add a rolling date Adaptive Reuse Ordinance to Hollywood which will allow for the conversion of underutilized office and commercial space to housing, a program which was immensely successful in preserving historic buildings and adding new residents to Downtown. - Anti Displacement Focus: • Focus on the Vermont/Western Station Neighborhood Area Plan (SNAP) to add	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_AM_04-20-2023.pdf (pg 1)	4/20/23	Unknown	Support Hollywood Heritage, LA Conservancy, and CHC to protect historic buildings. Do not roll back years of historic building protections.	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_AM_04-20-2023.pdf (pg 2-3)	4/20/23	Mike Callahan	Plan will adversely impact the historic Hollywood community. Protect Hollywood Blvd, support adaptive re-use of vacant historic office buildings. Reject the adoption of the plan and in support of Hollywood Heritage, LA Conservancy and the CHC.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-21-2023.pdf (pg 1-2)	4/21/22	The Silver Lake Heritage Trust	Revise the plan. In support of Hollywood Heritage, LA Conservancy, and CHC. Protect local landmarks.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-21-23.pdf (pg 1-2)	4/21/23	Brian Dyer	The announcement of PLUM Special Meeting is short notice.	
			The Plan is not transparent about the Hollywood Cap Park	The Policy Document notes the Hollywood CAP Park as a possible future park. The Proposed Plan does not include the Hollywood CAP Park, and the development of the park would be required to follow its own review process with the City.
			Planning stated the transportation plan didn't need to take into account the Hollywood Bowl season and street closures. Transportation study was done off season, during weekdays and is not adequate.	See FEIR Master Response No. 8 - Transportation & Traffic
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-21-23.pdf (pg 2-3)	4/21/23	Danielle Wilson	*(Attached letter on behalf of UNITE HERE Local 11 and the Coalition for Economic Survival)* Recommendation for a hotel CUP appealable to council across the plan area, not just RC, with additional findings	
			No automatic increases in base zoning rights, maintain base FAR in RC	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-21-23.pdf (pg 5)	4/21/23	Richard Abrams	Need to study a downzoning alternative (duplicate submissions sent twice - 1 page comment)	There is no need to study such an alternative. See Response to Comment 15-5 of the FEIR: "The purpose of the Alternatives chapter is to provide reasonable alternatives that reduce one or more identified significant impacts of a project in order to aid decision makers in weighing the merits of a project against the potential environmental impacts disclosed throughout the EIR. The EIR need not account for every conceivable alternative to the Proposed Plan including alternatives that do not meet the primary or secondary objectives of the Plan."

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-21-23.pdf (pg 6-21)	4/21/23	J.G. (unclear)	14-page letter with a 3-page letter, and 7 attachments, regarding historic preservation. Supports Hollywood Heritage, must protect historic resources and potential historic resources.	See FEIR Master Response 3 - Historic Resources, as well as individual responses to comments regarding historic preservation. See the Hollywood CPIO District for detailed regulations that address historic preservation.
			When the City created a Cultural Heritage board in 1962, it was for the purpose of preserving the City's heritage. In the 1980s, volunteers helped earmark historic sites by walking the streets.Historical background is what we use to build on.	See FEIR Master Response 3 - Historic Resources, as well as individual responses to comments regarding historic preservation. See the Hollywood CPIO District for detailed regulation that address historic preservation.
			Wildlife exists in Hollywood's backyards and not only the designated open space (Griffith Park, Santa Monica Mountains). Need to protect mature trees and open space.	See FEIR Master Response 7 - Biological Resources, and the Director's Memo to PLUM dated 4/18/23. Can also refer to the CPC-approved Wildlife Ordinance.
			New Mayor has yet to appoint new planning director and new planning commissioners. Elected representatives are the ones chosen by the people to represent us.	
			Attachment 1 - 1962 Article about the creation of a Cultural Heritage Board	
			Attachment 2 - 1963 Article about historic structures being preserved	
			Attachment 3 - 1980 Article about preservation	
			Attachment 4 - 1982 Article about volunteers walking the streets to conduct a preservation survey	
			Attachment 5 - 1991 Article about development issues with developers in the City	
			Attachment 6 - A list of LA Times article headlines/titles regarding housing crisis dating between 1945 to 2020	
			Attachment 7 - A 2023 US Census press release regarding population decline in Los Angeles County, 2021-2022.	See Planning's Memo to PLUM dated 4/18/23 in the Council File, as well as FEIR Master Response No. 2 - Population, Housing and Employment.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-21-2023.pdf (pg 1-3)	4/21/22	UNITE HERE Local 11	A hotel CUP appealable to Council that will consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand. The CUP should also require an analysis of the impact of the project on housing and small businesses. The CUP should explicitly ban the conversion of RSO units or require replacement with affordable units.	
			Do not increase base FAR.	
			Hotels should not be allowed in projects using CPIO incentives	
			Require 1 to 1 replacement for projects using CPIO, TOC, and DB	
https://clkrep.lacity.org/onlinedocs/2021/21-	4/21/22	Margaret Taylor (Melrose BID)	Transparency requirement exception for Properties along Melrose between Fairfax and Highland that provide murals/artwork	

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0934_PC_M1_04-21-2023.pdf			Tenant size exception for Art Galleries, Furniture and Rug stores, and secondhand clothing stores	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-21-2023.pdf (pg 7-136)	4/22/23	Heritage Properties (Letter is approximately 129 pages and is dated 4/21/23)	A. Timeline of CEQA - Took more than 5 years from issuance of NOP to release of FEIR. Letter lists environmental impacts of the plan.	See FEIR Master Response 2 - Population, Housing and Employment and Planning's Memo to PLUM, dated April 18, 2023 regarding the baseline population.
			B1. Flaws in FEIR and Participation: DEIR did not release actual draft of CPIO until after the comment period for DEIR was closed. Public did not know full extent of project and were not able to formally comment on CPIO.	The DEIR included a concepts draft of the Community Plan Implementation Overlay (CPIO) District as Appendix E. As noted in the FEIR, multiple comments were submitted during the Draft EIR public comment period and after the comment period ended regarding the Proposed Plan's CPIO District, which as mentioned a concepts draft of the CPIO was published with the Draft EIR in November 2018. Due to comments received about affordable housing and historic protection, the Hollywood CPIO was revised to include a tailored affordable housing incentive system to encourage mixed-income housing and 100 percent affordable housing, and to establish additional review procedures and development standards for projects with historic resources. As discussed in Chapter 2.0 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects) of the FEIR, the changes to the Proposed Plan are found to have been analyzed in the Final EIR and does not result in significant new information under CEQA Guidelines Section 15088.5 as a result of causing a new significant impact or substantial increase in the severity of an environmental impact. After the concepts draft of the CPIO was released with the published DEIR in 2018, a more detailed draft CPIO was released in August 2020. Staff shared the document widely (on the project website

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			B1. Flaws in FEIR and Participation: DEIR did not identify amending/repealing the Redevelopment Plan.	Chapter 4.10 (Land Use & Planning) includes a detailed discussion on how the land use designations and zoning ordinances of the Proposed Plan would supersede the Redevelopment Plan policies and provisions that are inconsistent with the Proposed Plan. Impact 4.10-2 discussed how the Proposed Plan, which would supercede the Redevelopment Plan, would not be in conflict with the Redevelopment Plan. The FEIR noted the Ordinance to Amend the Hollywood Redevelopment Plan in Chapter 4.
			B2. Failure to Acknowledge or Mitigate Impacts From Adding 7,000 More Housing Units To The Plan. FEIR concludes these significant changes would not alter the impacts of the plan. This conclusion is not supported by substantial evidence.	Details and additional discussion of each environmental impact category is provided in Chapter 2 of the FEIR.
			B3. The EIR fails to address the growth-inducing impacts and incorrectly concludes that the project would be growth-accommodating, despite the fact that the Plan would allow for development far in excess of the growth projections prepared by the Southern California Association of Governments (“SCAG”).	See FEIR Master Reponse No. 2 - Population, Housing, and Employment.
			B4. EIR fails to identify Air Quality Management Plan (AQMP) consistency impacts, infrastructure impacts and impacts associated with the displacement of persons and housing units.	See FEIR Response to Comment 36-27, Master Response No. 4 - Infrastructure, and Master Response No. 6 - Displacement and Affordable Housing
			B5. FEIR fails to include feasible mitigation measures to reduce those impacts, and improperly rejects mitigation measures included in the EIRs for the Hollywood Redevelopment Plan and the prior Community Plan.	See FEIR Master Reponse No. 3 - Historic Resources.
			B6. FEIR does not adequately address comments from public and agencies regarding impacts being more severe than described in FEIR	The commenter has not provided substantial evidence to to support that disagrees with the FEIR did not adequately address comments from public and agencies regarding impacts being more severe than described in the FEIR.

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-21-2023.pdf (pg 7-136)	4/22/23	Heritage Properties (Letter is approximately 129 pages and is dated 4/21/23)	C. Recirculation of DEIR - EIR needs to corrected and revised because of project changes after the DEIR and after CPC and omitted feasible mitigation	The FEIR details changes to the Proposed Plan post CPC and DEIR publication. The RDEIR recirculated the Transportation section due to updates to the CEQA Guidelines in response to SB 743 and new CEQA Guidelines, which resulted in the City's adoption of new transportation thresholds . The RDEIR updated Section 4.15 (Transportation) to reflect the new CEQA Guidelines and the City's most recently adopted transportation thresholds. Therefore, the RDEIR was updated to reflect Vehicle Miles Traveled as the primary metric for transportation impacts and the impact conclusions and mitigation measures were updated accordingly.
			D. FEIR has impermissible post HOC rationalization of the impacts of the modified project; CPC and Mayor prematurely recommended approval before the FEIR was released. This chain of events violate the basic purpose of CEQA. Discussion of sequencing - Staff included additional Technical Modifications at the 2/17/21 CPC meeting, 3/18/21 CPC meeting, and then CPC made additional changes to the project so CPC recommended approval of the Modified Project despite the fact that no environmental review had been conducted for the Modified Project, which is not permissible under CEQA. City Council doesn't have time to review the EIR and relies on the Commission to do it. Also, on April 19, 2023 stakeholders were notified of the PLUM meeting to be held on April 24, 2023. The EIR was placed in the COuncil file on 3/30/23 and supplemental environmental analysis and additional proposed modifications to the Proposed Plan was transmitted to Council on 4/18/23. The City has engaged in a CEQA process that requires that an FEIR be reviewed, certified and considered before the project is approved.	The DEIR, Recirculated EIR, and FEIR was transmitted to Council File on August 18, 2021, which provided direct links to the documents. On March 30, 2023 City Planning again transmitted the DEIR, Recirculated, and FEIR to the Council File, but this time transmitted it as three separate PDF files. The contents of the DEIR, Recirculated sections of the EIR, and FEIR were the same as content in the links that were transmitted to the Council File on August 18, 2021. The Technical Modifications noted in the April 18, 2023 Director of Planning's Memo to PLUM presented options for modifications to the Hollywood CPIO and zoning subareas that were consistent with the requests set forth it letters from CD 4, CD 5 and CD 13, and as noted in the memo the changes did not result in new environmental impacts.
			E. FEIR violates PRC because it is not written written in a manner useful to decision makers. The EIR includes the FEIR, DEIR, RDEIR, and additional analysis in PLUM letter. But NOA only sends to public planning website which only has links to the DEIR and FEIR. Members of public would have no way of knowing about the RDEIR.	An NOA was completed for the Draft EIR, Partially Recirculated Draft EIR, and the Final EIR. The website that the commenter has provided a screenshot of has a column for the DEIR and separate one for the FEIR. When you click on the "DEIR" it takes you to the landing page that shows the Recirculated EIR, and a NOA is available for the REIR is found on that site.

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			E. Traffic Section of RDEIR found no impact but FEIR Corrections and Additions replaces the Transportation and Traffic rows, finding that the proposed Project will result in four significant unmitigated traffic impacts	The RDEIR included recirculated sections, including Section 4.15 (Transportation) and 5.0 (Alternatives) and new Appendix because after the publication of the DEIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts under CEQA. The CEQA Guidelines were updated in response to Senate Bill 743 to establish criteria for determining the significance of transportation impacts by a metric other than level of service. In response to SB 743 and new CEQA Guidelines, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019. The RDEIR updated SEction 4.15 (Transportation) to reflect the new CEQA Guidelines and the City's most recently adopted transportation thresholds. Therefore, the RDEIR was updated to reflect Vehicle Miles Traveled as the primary metric for transportation impacts and the impact conclusions and mitigation measures were updated accordingly. The corrections the commenter is referring to is corrections to DEIR Chapter 6.0 (Other CEQA Considerations) to reflect the updates noted in the RDEIR.
			E. The RTC in FEIR does not contain the actual comments and hides actual comments in two Appendix Q's.	The FEIR does not hide comments. All of the comments received during EIR public comment period are included included, in full, in Appendix Q of the FEIR. Each comment letter is given a comment letter number and individual comments are bracketed to organize comments. Chapter 3.0 provides responses to each comment.

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			F. FEIR Project Description - courts have held than an accurate, stable, and finite project description is fundamental to a legally sufficient EIR, but the proposed project description in the FEIR is not accurate or stable. Multiple changes have been made to policy document, land use designations/height districts, and CPIO.	See Chapter 2.0 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects) of the FEIR, which describes modifications to the Proposed Plan since the DEIR was published in detail and describes how the changes to the Proposed Plan were found to have been analyzed in the Final EIR and does not result in significant new information under CEQA Guidelines Section 15088.5 as a result of causing a new significant impact or substantial increase in the severity of an environmental impact. Section 2.1 of Chapter 2 details updates to the policy document, updated recommendations to the proposed land use and zoning, and updates to the Hollywood CPIO. The revisions to the CPIO were to include a tailored affordable housing incentive system, and to establish additional project review procedures and additional development standards for projects with historic resources. A detailed list of changes are noted in Section 2.1 of Chapter 2 in the FEIR. It should be noted that after the concepts draft of the CPIO was released with the published DEIR in 2018, a more detailed draft CPIO was released in August 2020. Staff shared the document widely through the project website and email notification to interested parties, held online webinars, virtual office hours, and held a public hearing where staff heard
			F1. Redevelopment Plan - description of project, DEIR, and DEIR does not include amendment of redevelopment plan	Chapter 4.10 (Land Use & Planning) includes a detailed discussion on how the land use designations and zoning ordinances of the Proposed Plan would supersede the Redevelopment Plan policies and provisions that are inconsistent with the Proposed Plan. Impact 4.10-2 discussed how the Proposed Plan, which would supercede the Redevelopment Plan, would not be in conflict with the Redevelopment Plan. The FEIR noted the Ordinance to Amend the Hollywood Redevelopment Plan in Chapter 4.

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			F1. HCR - description of project, DEIR, and DEIR does not include amendment of HCR	The HCR Ordinance is described in the FEIR's Chapter 2 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects). Chapter 2 also notes that in accordance with CEQA Guidelines Section 15088.5, the changes described in this chapter are clarifications or modifications to the EIR analysis that does not result in new significant information as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact.
			F2. Changes about increasing density/upzoning are not included in descriptions in the DEIR/FEIR of this modified project (several changes and additions are listed, with explanations on how the FEIR fails to disclose further analysis on the impact of these modifications)	Chapter 2 (Modifications and Technical Refinements to the Proposed Plan and Environmental Effects). Chapter 2 also notes that in accordance with CEQA Guidelines Section 15088.5, the changes described in this chapter are clarifications or modifications to the EIR analysis that does not result in new significant information as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact. The Draft Redevelopment Ordinance was shared publicly in January 2021 prior to the public hearing before City Planning Commission on February 18, 2021.
			F2. The FEIR concludes the modified project would result in 7,000 additional housing units, but no increase in population because the additional units would be vacant. Why are density increases necessary if the housing will be vacant/not occupied? The FEIR did not provide a copy of the proposed zoning map and change matrix noting the zoning changes made between the DEIR and FEIR.	Appendix C (Updated Proposed Change Area Map and Change Matrix) of the FEIR shows the map of the Community Plan Area, and shows all of the zoning subareas that include proposed zoning changes, as well as a corresponding matrix that provides more details about the existing and proposed zoning for these zoning subareas. In addition, Chapter 2 of the DEIR provides a detailed discussion of the updates/refinements to the CPIO since the DEIR was published in 2018.
			F2. FEIR says that the DEIR analyzed housing units without factoring vacant units - this is not true the DEIR used average occupancy per unit, and applied it to the number of units, to calculate anticipated population.	The FEIR is correct in that assessment. The DEIR did use the average person per household to calculate population (based on the number of housing units) but the Reasonably Expected Development assumed that all of the units were occupied.

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-21-2023.pdf (pg 7-136)	4/22/23	Heritage Properties (Letter is approximately 129 pages and is dated 4/21/23)	G. EIR does not identify growth inducing impacts of the proposed project and resulting significant impacts. DEIR Ch. 6 states the project would be consistent with regional growth forecasts and therefore would not be growth-inducing - this is not true and in contradicted in DEIR and FEIR: RED exceeds SCAG's 2016 RTP/SCS projections for year 2040.	See FEIR Master Response No. 2 - Population, Housing and Employment
			G1. Failure to identify and mitigate significant infrastructure impacts	See FEIR Master Response No. 4 - Infrastructure,
			G2. Failure to identify and mitigate significant AQMP Consistency impacts. The mistakenly concluded the implementation of the plan would have less than significant impacts in terms of confliction with AQMP.	Section 4.3 (Air Quality) of the DEIR includes a detailed discussion of why the Proposed Plan would not conflict with or obstruct implementation of the AQMP (discussion under Impact 4.3-1)
			G3. Failure to identify and mitigate significant RTP/SCS Consistency Impacts. DEIR and FEIR versions of the proposed Project are not consistent with the SCAG projections used in developing the RTP/SCS.	Section 4.10 (Land Use & Planning) includes a detailed discussion, including a consistency table that described how the Proposed Plan is consistent with the goals of the RTP/SCS, including SCAG's projections that were used in developing the RTP/SCS.
			H. Failure to adequately identify cumulative impacts - The plan exceeds SCAG growth forecasts and does not account for the update of 6 additional community plans. Methodology compares 2010 population to 2016 SCAG forecasts. Analysis should have accounted for these other projects in the cumulative analysis.	The commenter has not provided any substantial evidence to support that the EIR did not adequately identify cumulative impacts. The Proposed Plan's reasonably expected development exceeds SCAG's 2016 RTP/SCS projects for the year 2040 to better align with the City's growth policies and objectives, based on factors such as availability of transit infrastructure and directing growth near transit systems. CEQA Guidelines Section 15130 allows for two approaches to study cumulative impacts: using a list of past, current and probable future project or relying on a summary of projects/growth forecasts from adopted local, regional or statewide plans. As the Proposed Plan is a community plan update covering an area of Los Angeles over a twenty plus year planning period, the EIR's cumulative impacts analysis relies on the summary of projections method, and uses SCAG's projections. This is further discussed in Appendix B (Methodology) of the DEIR. Appendix B mentions 2010 Census data as a source for information purposes and the rationale for including it for reference is further discussed in Appendix B.

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			I. FEIR conclusion that changes to the project will not result in additional impacts is not supported by evidence (Letter lists the following environmental impacts studied that with the modified project will result in new impacts: I.1 Aesthetics - increased development will increase impact on lighting and glare. The FEIR fails to include estimates on increases of potential light and glare impacts and how existing mitigation measures are adequate. I.2 Air Quality - evidence in FEIR is not supported by substantial evidence. No additional air quality modeling was performed. Modified Project exceeds SCAG's population forecasts, so it's not consistent with the AQMP, and would result in a new significant unmitigated AQMP consistency impact that wasn't identified in the FEIR so should be recirculated. The FEIR's Modified Project doesn't note the increase in office, retail, commercial and industrial square footage or the Modified Project's increases in employment. 1.3 Cultural Resources - FEIR didn't quantify the number of additional historic properties that could be impacted by the Modified Project. Impacts would be substantial unless mitigation measures are adopted to reduce the impact to a level of insignificance. The City instead has opted to reject feasible historic resource mitigation measures. Recirculation of the EIR is required because the Modified Project would increase the severity of historic resources. 1.4 GHG - impact discussion is not supported by substantial evidence. No additional air quality modeling was completed for the Modified Project so how were these numbers generated?	Aesthetics: The thresholds of significance for aesthetics, as noted in Section 4.1 of the DEIR, is if the Project would have as substantial adverse effect on a scenic vista (in Hollywood areas with focal views such as public views from Griffith Park or of the Hollywood sign), an impact on scenic resources such as rock outcroppings or historic buildings on a state scenic highway, would degrade the visual character, or create a new source of substantial light or glare affecting nighttime views. The FEIR concluded that the Modified Project would allow increased building heights, but Mitigation Measure AE1 would still apply and mitigate glare impacts by limiting glass on the external facade of buildings to be no more reflective to comply with the Green Building Code. The DEIR concluded that because of the regulatory framework that has specific lighting requirements, the Proposed Plan's impacts on creating new sources of substantial light would be less than significant. Air Quality: The FEIR concludes that although air pollutants generated in the Plan Area could incrementally increase due to a marginally increased average anticipated rate of development, the timing and location of such development would continue to not be reasonably foreseeable; construction resulting from the
			J. Failure to identify and mitigate significant impacts due to the displacement of people and housing	See FEIR Master Response No. 6 - Displacement and Affordable Housing
			J1. EIR doesn't provide substantial evidence that impacts related to Population growth being less than significant	See FEIR Master Response No. 2 - Population, Housing and Employment
			J2. EIR concludes that the proposed Project will result in a less than significant displacement of housing units and people. The plan will increase displacement of RSO tenants. TOC and DB has also resulted in displacement of tenants in the plan area. (Figures from the LACP Housing Dashboard are included in this section)	See FEIR Master Response No. 6 - Displacement and Affordable Housing
			J3. The FEIR for the proposed and Modified Projects fails to demonstrate that the Project will not increase the displacement of people and housing units the Plan area. Plan anticipates 7,000 new housing units, but fails to quantify how much housing will be built on vacant land or how much will result in demolition and replacement of existing units.	See FEIR Master Response No. 6 - Displacement and Affordable Housing

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			K. CPIO's administrative process for historic resources and eligible historic resources give the Director power to override State and Federal designations is against state and federal law for historic properties.	The CPIO creates a new review process for eligible resources that does not exist today. If a project that involves an eligible resource does not meet the Secretary of Interior's Standards, the CPIO would trigger additional environmental analysis that could result in the need to prepare an EIR if there is a significant and unavoidable impact to a historic resource.
			L. Failure to include feasible mitigation measures in EIR which would reduce significant impacts	
			L1. Improper Elimination of Mitigation Measures Required by the Hollywood Redevelopment Plan EIR	Appendix M of the EIR includes a detailed inventory of the Hollywood Redevelopment Plan EIR and discusses the impact of removing them.
			L2. Failure to Provide Mitigation Measures for Significant Impacts to Historic Resources *(section includes suggestion of several mitigation measures)*	The suggested mitigation measures would not reduce the impact to a less than significant level. The commenter states that the CPIO would remove parcels from historic district protection, review, and treatment. This is not accurate. The CPIO adds a new review process for all eligible resources within the CPIO, which would require that projects comply with the Secretary of the Interior's Standards as well as an environmental review process.
			L3. Failure to Require Adoption of the Traffic Impact Fee as a Mitigation Measure *(section includes suggestion of a mitigation measure)*	The commenter states that the Transportation Impact Fee must be required or the EIR analysis, which assumes Mobility Network improvements, is invalid. This statement is not accurate. The City has access to multiple funding sources to fund mobility networks and it is not dependant on developer fees. Funding sources include State sources, such as the Active Transportation Program (ATP), greenhouse gas reduction funds through Affordable Housing Sustainability Grant Programs; the Road Maintenance and Rehabilitation (SB1) Fund. This also includes local funding sources, such as Measure M's Metro Active Transportation Programs, Central City Multi-Year Subregional Programs, Measure R Local Return, and Local Return Funds.

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			L4. Failure to Apply Mitigation Measures Plan-Wide - apply beyond the CPIO and to ministerial projects. Suggests a new Bio MM to update ZIMAS to identify all parcels within the Santa Monica Mountains Zone, and require a Biological Resource Assessment for any building or demolition permit application and do not allow for CEQA exemptions.	The commenter's statement that the Community Plan, CPIO, and/or EIR are required by law to include a mechanism to ensure that all mitigation measures are applied to the entire CPA is not accurate.
			M. Impacts listed as significant and unavoidable in DEIR have been removed in FEIR and replaced with less than significant impacts without providing mitigation for identified traffic impacts	The RDEIR included recirculated sections, including Section 4.15 (Transportation) and 5.0 (Alternatives) and new Appendix because after the publication of the DEIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts under CEQA. The CEQA Guidelines were updated in response to Senate Bill 743 to establish criteria for determining the significance of transportation impacts by a metric other than level of service. In response to SB 743 and new CEQA Guidelines, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019. The RDEIR updated Section 4.15 (Transportation) of the DEIR to reflect the new CEQA Guidelines and the City's most recently adopted transportation thresholds. Therefore, the RDEIR was updated to reflect Vehicle Miles Traveled as the primary metric for transportation impacts and the impact conclusions and mitigation measures were updated accordingly. The corrections the commenter is referring to is corrections to DEIR Chapter 6.0 (Other CEQA Considerations) to reflect the updates that were previously noted in the RDEIR.
			N. Comments on the EIR are not adequately addressed	
			O. Correct and recirculate EIR because it is flawed	
			Attachments A: Ellis Act Evictions 2016-2020,	
			Attachment B: DEIR Appendix M - Inventory of Mitigation Measures with Comments	Commenter provides her opinion on why the identified mitigation measures in the Redevelopment Plan EIR (DEIR Appendix M) should not be deleted and why removing the mitigation measures result in an impact.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-21-2023.pdf (pg 137-139)	4/22/23	Marian Dodge, Charlie Mims (Hillside Federation)	Supports recommendations made by CD4 - Raman office: 55 to 99 year covenant length, 1 to 1 replacement, SMMC as a Trustee Agency	
			Additional Request to include the addition of SMMC Natural Resource Protection Plan Maps considered by the City https://clkrep.lacity.org/onlinedocs/2021/21-1284_caf_11-22-22.pdf	See Director's Memo to PLUM dated 4/18/23 (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)

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			Any project located in a Habitat Block in the Santa Monica Mountains Natural Resource Protection Plan shall trigger a biological resource assessment and compliance with BR-1, BR-2, and BR-6.	
			Surplus Land - SMMC has first right of refusal	
			Wildlife Ordinance	See Director's Memo to PLUM dated 4/18/23 (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
			Safety Element of the General Plan (no upzoning in Very High Fire Hazard Severity Zones) https://clkrep.lacity.org/onlinedocs/2020/20-1213_misc_04-11-22.pdf	
			State Minimum Fire Safe Regulations (Link to Fire Regulations https://bof.fire.ca.gov/media/v4zjh5pz/noa_rule-text.pdf)	
			https://clkrep.lacity.org/onlinedocs/2021/21-1470_ord_187505_7-4-22.pdf - Wildlife Ordinance https://planning.lacity.org/odocument/75d6824d-248b-4b12-a61e-f99616e032ef/2022_Wildlife_Ordinance_Staff_Report_EXHIBIT_A_-_Proposed_Wildlife_District_Ordinance_Components.pdf	The link references Ordinance 187505. See Director's Memo to PLUM dated 4/18/23 (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf) for discussion on the Wildlife Ordinance.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-21-2023.pdf (pg 1-16)	4/22/23	Richard Abrams	DUPLICATE SUBMISSION - Need to study a downzoning alternative	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-21-2023.pdf (pg 16-48)	4/22/23	Hollywood Media District BID (Letter with attachments)	In support of the plan, except for the Q-condition that will prohibit residential development, including hotel and joint living / work quarters. More housing is critical for this areas as a well known job center and transit corridor. (Letters attached are from Sheppard Mullin submitted in the past for site specific subarea change requests)	The property is already zoned for industrial uses only, which prohibits residential uses regardless of the [Q] Condition.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 1-4)	4/23/23	Donna Williams	Afton Square resident in support of Hollywood Heritage and LA Conservancy. The plan eliminates protections for non-contributors in an identified historic district and provides multiple avenues for demolition of non-contributors and potentially eligible properties based on structural condition, cost of rehabilitation, market value of the property in its current condition, and economic feasibility of Rehabilitation.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 5)	4/23/23	Bob and Ziggy	Supports recommendations of Hollywood Heritage and LA Conservancy	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 7-12)	4/23/23	Lesley O'Toole-Roque	Request to revert plan back to recommendation from planning to CPC - retain Corridor 5 (Sunset Boulevard between Fairfax Avenue and Vista Street) zoning except for allowing an appropriately scaled height increase for 100% affordable housing. Various plan objectives are cited in the letter to support this request.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 13-15)	4/23/23	Susie Shannon (Housing is a Human Right) DUPLICATE COMMENT	Request to study and implement mandatory inclusionary zoning throughout plan area	
			1 to 1 replacement of affordable units with tenant right to return at rents before displacement	
			Revocation of building permits when tenants are illegally displaced	
			Preservation of rent stabilized and government restricted affordable housing	
			Prioritizing adaptive reuse for affordable housing to preserve historic buildings	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 15-34)	4/23/23	Brian Curran (Hollywood Heritage) Letter Dated: Dec. 29, 2022; rev. 2/17/2023; rev 4/16/2023	1. Pitting housing affordability against historic Hollywood, rather than planning for the great locations for each: CPIO creates conflicts with historic districts and historic landmarks. Repeal of redevelopment plan cancels obligations for Urban Design standards and protections for historic resources.	
			2. Failing to meet minimum OPR Planning standards (city infrastructure to support the plan, failing to calculate buildout/SCAG projections and infrastructure needs, failing to follow zoning code) - LAMC Section 11.5.8 requires monitoring.	Consistent with LAMC Section 11.5.8, Program 104 of the Hollywood Community Plan Text (Exhibit C of the PLUM Transmittal) states the following: Monitor the inventory of units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households. Additionally, see FEIR Master Response 2 (Population, Housing and Employment) and Master Response 4 (Infrastructure).
			3. Repealing Specific Plan-type planning in favor of “old school” crude upzoning (examples provided: Repeals redevelopment plan, repeals current environmental regulations, including repealing current “D” and “Q” conditions, extends regional center)	
			4. Failing to deliver for affordable housing (examples provided: CPIO feasibility study: shows that the proposed CPIO does not work in central Hollywood, where “incentive” affordable units are not feasible in the high density high rise and even mid rise housing type on high cost land, CES eviction data, no conflict mapping)	

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			EIR “NO PROJECT” Alternative #1 is superior	The No Project Alternative does not meet the identified primary or secondary objectives of the Project and therefore can not be considered as the environmentally superior alternative. See Chapter 5.0 (Alternatives) of the DEIR.
			The EIR fails to calculate buildout capacity of the current Plan	The Hollywood Community Plan's Reasonable Expected Development, which is determined based on a number of factors, as described in Appendix B of the DEIR, is supported with substantial evidence.
			Pages 23-28: Summary Table of Plan Flaws and corrections	
			Pages 29-34: Various map/table attachments (Conflict Map with subareas, Pop/Housing/RHNA Tables, Historic Resources Map)	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 35-40)	4/23/23	Casey Madren	Supplemental analysis should be required for Chapters on Utilities & Services Systems and their analyses of water supply and wastewater, due to new info and changes in plan since the EIR was prepared.	See Response to Comment I-2 in the Housing Element FEIR at page 3-65. Also see Response to Comment O-10.14 in the Housing Element FEIR, which includes additional details from DWP about the 2020 Urban Water Management Plan, as well as details about DWP's 2020 UWMP. See: https://planning.lacity.org/eir/HEU_2021-2029_SEU/Feir/files/3-Responses%20to%20Comments.pdf
			Climate change, drought and 2021 sewage spill at the Hyperion Treatment Plant have impacts on water supply and waste water.	
			LADWP is relying heavily on a new initiative, Operation NEXT/Hyperion 2035, to meet the City’s future water needs. This program aims to maximize the supply of purified recycled water from the Hyperion Treatment Plant to replenish the city’s groundwater basins through indirect potable reuse (NOP issued in 2021)	
			Both DT and HWD EIRs rely on the LADWP’s 2015 Urban Water Management Plan, a document that is now seven years old.	
			Both EIRs conclude that there will be no significant impacts and no need for mitigation in the sections on Water Supply and Wastewater. A supplemental EIR needs to be prepared to address this issue.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-2023.pdf (pg 41-170)	4/23/23	Fran Offenhauser	DUPLICATE SUBMISSION	
"https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-23-	4/23/23	Fix the City (letter is different than the one in the rows	PLUM letter is an example that the City does not comply with court orders	See Planning's Memo to PLUM dated 4/18/23, specifically Section IV. Framework Element Reconsideration and Supplemental Findings
			The HCPU is inconsistent with General Plan Framework	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-24-23.pdf	4/24/23	Housing is a Human Right	Study and implement inclusionary zoning throughout plan area	
			One for One replacement of affordable units with right of return at rents they were paying prior to displacement	

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(entire pdf, 2 pages)			Revocation of building permits when tenants are illegally displaced	
			Preservation of rent stabilized and government restricted affordable housing	
			Prioritize adaptive reuse for affordable housing to preserve historic buildings	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-23-2023.pdf (pg 1-2)	4/23/23	Richard Abrams	DUPLICATE SUBMISSION - Need to study a downzoning alternative	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-23-2023.pdf (pg 3-14)	4/24/23	Park La Brea Impacted Residents Group (PLBIRG)	Metro's data shows decrease in transit and increase in homelessness because of luxury densification of Hollywood	
			Need to study Uber/Lyft impacts on transit, VMT, and congestion (Study on Uber and Lyft is attached)	See the Hollywood Community Plan DEIR Section 4.15 (Transportation & Traffic) and 4.15 (Transportation & Traffic) of the Recirculated DEIR.
			Ensure that affordable units for TOD projects are not occupied by friends/family of the developers. Ensure occupants of affordable units remain income qualified.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M_04-24-2023.pdf (pg 1-39, entire PDF)	4/24/23	Fix the City	Fix the City opposes the proposed amendments to the Framework Element. They are not compliant with prior Court orders. The action approved by the Council must be approved by the Court.	See Section IV of Planning's Memo to PLUM dated April 18, 2023.
			Policy 3.3.2 is to accommodate projected population and employment growth and the City must monitor population, development, infrastructure, service capacities within each CPA, and provide annual reports.	
			The HCPU is inconsistent with the Framework Element. The City did not appeal the Court orders but provided other analysis.	
			The Framework Element has been incorporated as mitigation measures in numerous instances. The Courts of Appeal: when something is a mitigation measure it cannot be simply deleted by the government agency.The City cannot delete Policy 3.3.2 and associated ones.	
			Analysis of Fire/Emergency/Police relies of Framework 3.3.2 as a mitigation measure to lessen impacts.	
			The City, in 2014, relied upon a CEQA exemption for the Framework Element, Fix the City is reiterating the objections from then.	
			The Amendment to the Framework Element is to override the Court's orders in the Hollywood CPU.	
			The analysis/conclusion that there is no environmental impact to the Framework Element is improperly concluded. Environmental review is required.	
			Amending the Framework Element is procedurally improper. The Framework Element amendment was not considered by the CPC in 2021, as part of the CPU. Mayor Bass did not recommending this per Section 555.	
			Pages 9-39 are various CPUs with pages referring to Framework and monitoring attached.	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-24-2023.pdf (pg 24-26)	4/24/23	Doug Haines	Did not get notification of PLUM meeting despite being a plaintiff for 2012 litigation. Objects the notification commission and requests rescheduling of meeting with notification of all relevant parties	On 4/19/23, the 4/24/23 PLUM Meeting Date email notification was sent to representatives from Robert Silverstein Law (robert@robertsilversteinlaw.com and brad@roberstsilverstein.com) who represented La Mirada during 2012 litigation. Mr. Haines uses the following email (ehnc@easthollywood.net), which is noted as his email contact on the East Hollywood Neighborhood Council's website. He unsubscribed from the Hollywood Community Plan email list and requested to no longer be notified about the Project. Staff discovered that he was not on the list only when we tried to add him back to the list (on 4/28/23) and it was flagged that he had requested to be unsubscribed from the notification list.
			Opposes the environmental impact analysis. The city has an obligation to file a return to the writ issued in this matter and has failed to do so. City has refused to abide Court orders.	
			Population has declined in Hollywood over the past 30 years by over 20,000 of almost entirely low income minorities. U.S. Census shows East Hollywood led both the city of Los Angeles and Los Angeles County in population loss between the years 2010 and 2020.	See FEIR Master Response No. 2 - Population, Housing and Employment and the April 18, 2023 DCP Memo to PLUM that discusses the Baseline Population.
			Remove FAR increases and other densification measures because they violate court order.	See Director's Memo to PLUM dated 4/18/23, specifically Section IV. Framework Element Reconsideration and Supplemental Findings (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_2_04-18-2023.pdf)
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-23-2023.pdf (pg1)	4/23/23	Carol Rosenblum	Please change the plan to Support of Hollywood Heritage, LA Conservancy, and CHC.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-23-2023.pdf (pg 2-6)	4/23/23	Lindsay Mulcahy	Expand the definition of eligible historic resources to include 5S3	This change was incorporated as an option for Council's consideration in Planning's Memo to PLUM dated April 18, 2023.
			Apply the full range of Historic Preservation Overlay Zone (HPOZ) preservation protections, procedures and existing tools to the Hollywood National Register Historic District.	An additional review process and findings were added to the CPIO for demolition permits to properties in the National Register HIstoric District.

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			Expand the CPIO boundaries and tools to East Hollywood as part of the SNAP	This would require additional noticing and the Plan would need to go back to CPC for a recommendation.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-23-2023.pdf (pg 6-12)	4/23/23	The Hollywood Partnership	Lack of public outreach - short notice of PLUM meeting and of policy changes to the plan. CD 4 and 5 constituents had more time to respond to letters from council offices	The PLUM meeting is scheduled by the City Council and agenda notice procedures followed the Brown Act.
			Hotel Amendments and Democratic Process - there is a ballot measure (LA Responsible Hotel Ordinance) that will be voted on. Ballot measure if passed should be applied uniformly across city	
			Lack of studies, need for more financial feasibility analysis for last minute recommendations	
			Litigious Nature of Land Use Planning in Hollywood - need to make sure plan is solid and legal	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-23-2023.pdf (pg 13-50)	4/24/23	Laurel Canyon Association (Letter includes 2 attachments)	Limiting mitigation measures in BR-1, BR-2, BR-3, R-4, BR-5 and BR-6 to projects that are discretionary. The SB9 Eligibility Criteria Checklist in ZIMAS tags properties that have "habitat for protected species" - this tool can be used to evaluate ministerial projects that should be subject to mitigation.	Earlier this year, LA City Planning's SB9 Eligibility Criteria Checklist on ZIMAS tags properties that have "habitat for protected species" so the commenter is correct that identifying parcels that may contain habitat for protected species would not require significant City resources. However, if all ministerial projects on parcels that ZIMAS flags as having "habitat for protected species" were required to complete a biological resource assessment report and submit the report to DCP and California Department of Fish and Wildlife, this new requirement and review process would likely affect over 7,000 parcels in the CPA. That would also mean that a minor addition to an existing house, which otherwise meets all other City and zoning requirements, would have to complete a biological resource assessment report and City Planning would have to create a new administrative review process to review and provide input on the report, in addition to CDFW's involvement. For example, someone who wanted to build a second story addition, which wouldn't change the building footprint and would otherwise be a ministerial by-right project where they would need to apply for a building permit, would now be required to complete a biological resource assessment report. LADBS would have to add a new clearance to the building permit for DCP's clearance. As part of the
			City could require that ministerial projects located in Habitat Blocks in the Santa Monica Mountains Conservancy Natural Resource Protection Plan (NRPP) be subject to BR-1, BR-2, BR-3, BR-4, BR-5 and BR-6.	Same response as above.

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			City could require that ministerial projects located in “natural areas” mapped by LA Sanitation should be subject to BR-1, BR-2, BR-3, BR-4, BR-5 and BR-6.	Same response as above.
			City should also require that the biological resources assessment report by submitted to trustee agencies such as CDFW and the SMMC prior to the issuance of the first permit for the Project.	The mitigation measures already require that biological resources assessment reports are submitted to CDFW (for discretionary projects), though it doesn't include the SMMC.
			Request to included 4 additional parcels (listed on pg 15 of letter) to be rezoned as Open Space	This would require new notification, public hearing, and CPC recommendation.
			City has not rezoned all land acquired by MRCA.	Many MRCA-owned properties were rezoned and additional sites were submitted after February 18, 2021 CPC meeting, which would have required additional noticing requirements.
			Please clarify the process for when vacant land is to be used as open space can be rezoned (as noted in staff report)	The Policy Document includes policy PR3.8 which states: "Encourage and support continuing efforts of non-profits in partnership with County, State, and Federal agencies to acquire vacant land for publicly owned open space." Future rezoning requests to zone properties to open space will have to make Community Plan consistency findings and this policy can but used to support such a rezoning request.
			Change suggestions to Biological Resource Mitigations BR1 - BR6	See responses above.
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M2_04-23-2023.pdf (pg 51-83)	4/24/23	Hollywood Media District	DUPLICATE SUBMISSION	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-23-23.pdf (pg 1 -2, entire pdf)	4/23/23	Bob and Ziggy	The court's binding ruling needs to be reviewed in this plan	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-23-2023.pdf (Entire PDF is one comment attachment)	4/23/23	Unknown	This comment is an attachment of chapter 2.14 Recreation and Open Space from the Los Angeles General Plan Framework EIR.	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-24-2023.pdf.pdf (Entire PDF is one comment attachment)	4/23/23	Unknown	This comment is an attachment of chapter 2.10 Fire/Emergency Medical Services from the Los Angeles General Plan Framework EIR.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (pg 1)	4/24/23	Tetlo Emmen	Support of Hollywood Central Park	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (pg 2-5)	4/24/23	Richard Platkin	Resume of Richard (Dick) Platkin	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (pg 6-7)	4/24/23	Julissa Padilla	Don't replace historic parts of Hollywood. Protect the historic legacy of Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (pg 8-11)	4/24/23	Fix the City (Revised Letter Dated 4/24/23)	Limiting attachment size is an infringement on 1st amendment rights + only 24 hour notice	
			2014 motion expired in 2016	See Section IV of Planning's Memo to PLUM dated April 18, 2023.
			City may not lawfully cherry-pick which policies it obeys and ignore mandatory policies	
			Without monitoring at the community plan level, the city has no substantial evidence of adequacy to support its actions	
			Amending Framework requires a citywide EIR (not a community plan EIR)	
			No evidence has been provided to reach the conclusion to remove a mandatory mitigation measure in a certified EIR requires a showing that the mitigation is no longer necessary.	
			Where is the application for amending the Framework Element?	
			Framework element amendment does not comply with LAMC 11.5.6	
			Since EIR launch in 2016, there have been substantial changes to city services and infrastructure and require a supplemental EIR, including the Alquist Priolo Fault Zone Maps.	See Response to Comment 15-4 of the Hollywood Community Plan FEIR on pages 3-114 and 3-115, as well as Appendix O of the FEIR.
			Letter includes suggestions (#10-#14), to protect RSO units.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (p12)	4/20/23	P. Alexandra Alznauer	Protect Historic Hollywood	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-24-2023.pdf (p12)	4/24/23	John Goodwin	Support of Hollywood Central Park	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_3_04-24-23.PDF (entire PDF document is this comment)	4/24/23	The Silverstein Law Firm	HCPU and CEQA documents must be rejected because they conflict with a ruling against the City of LA in the case of AIDS Healthcare Foundation v. City of Los Angeles	
			final judgment in that case, issued on April 22, 2022 and not appealed by the City, granted declaratory relief, inter alia, establishing that the Hollywood Redevelopment Plan's land use provisions and protections – including regarding development density limits and historic preservation protections – control and supersede over any conflicting LAMC and other City provisions.	
			The plan seeks to allow development density caps in excess of what is allowed in redevelopment plan	
			HCPU is illegal and in conflict with a non-appealed, final ruling against the City from 2022 that declared the Hollywood Redevelopment Plan has supremacy.	
			Pages 3-54 is Exhibit 1 and Exhibit 2 include information regarding the case AIDS Healthcare Foundation v. City of Los Angeles	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-24-2023.pdf (pg 1-5, pg 136-161 are attachments)	4/24/24	Fix The City	DUPLICATE SUBMISSION	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_M1_04-24-2023.pdf (pg 6-135)	4/24/24	Fran Offenhauser	DUPLICATE SUBMISSION	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_2_04-24-	4/24/23	Los Angeles Conservancy	Include 5S3	
			Apply HPOZ protections to Hollywood National Register Historic District	
			Include East HWD and SNAP in CPIO boundaries	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_1_04-24-23.pdf	4/24/23	Jamie Hall	DUPLICATE SUBMISSION	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_pc_04-28-23.pdf (1 page)	4/28/23	Susan Zager	Support of Hollywood Heritage, LA Conservancy, and CHC.	
			Historic Buildings and historic districts don't need to be lost to meet the housing goals of the plan	
			Amending the Redevelopment Plan is unnecessary.	

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			CPIO should effect areas where there are not historic buildings.	
			The City's economic study says they can work-in the lower density areas east of central Hollywood.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_04-30-2023.pdf (2 pages)	4/30/23	Mike Callahan	Vote no on the ordinance to suspend the Hollywood Redevelopment Plan	
			The plan will adversely affect historic buildings in the community	
			Adaptive re-use of vacant buildings is a better way to create housing	
			At PLUM meeting, staff misled the committee by implying that historic protections were included in the technical memo. What they failed to point out was that these protections were optional, they would only apply if the committee voted them in.	The Hollywood CPIO District, which was approved by CPC in March 2021, includes new regulations for historic preservation. This includes a new review process for the rehabilitation of eligible historic resources to make sure that demolitions of eligible historic resources within the CPIO do not occur without an assessment of the resource and environmental review. Planning's Memo to PLUM, dated 4/23/23, included additional options for Council's consideration. Two of the options (Option 4 and Option 5) were to add additional protections to historic resources. This included adding properties with the 5S3 status codes to the definition of "Eligible Resources" and a requirement for additional findings for projects that request the removal or demolition of any building or structure within a National Register Historic District, California Register of Historical Places, that is designated as a Contributing Element, or Altered Contributing Element.
			Take a look at public comment from previous lawsuit	
			The impact of suspending the current plan is not analyzed in the DEIR, RDEIR, and FEIR and in none of supporting docs. Staff may refer to Appendix M for their analysis, but that is a methodology, not a proper assessment of impact.	The commenter has not provided any substantial evidence to support that the Methodology (Appendix M of the DEIR) and the EIR's analysis is not supported by substantial evidence nor do they provide any other basis that would require different analysis or conclusions. The comment about the "current plan" is likely in reference to the Hollywood Redevelopment Plan and not the existing Hollywood Community Plan. See the Redevelopment Plan Consistency Findings section (starting on page F-1) in the Staff Recommendation Report, Exhibit A of the PLUM Transmittal to Council (https://clkrep.lacity.org/onlinedocs/2021/21-0934_misc_11_08-11-21.pdf), and Chapter 4.0 (Additions and Corrections) of the FEIR.

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			SurveyLA properties identified as “eligible” in EIR, with zero action, protection Plan footnote add: Apply to all SurveyLA identified properties: All permits and entitlements affecting parcels with SurveyLA identified properties shall be referred to OHR	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_05-01-2023.pdf (pg 1)	5/1/23	Unknown	Upzoning in the Regional Center according to the feasibility study prohibits affordable being built there and threatens historic resources. Increasing the FAR supports develops and will not create enough affordable housing, just more luxury projects.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_05-01-2023.pdf (pg 2)	5/1/23	Brian Folb	Limiting density and FAR will further limit the ability to provide lower cost housing. Incentives to maximize opportunity of providing higher percentages of affordable units are needed. Unlimited high rise development (30-60 stories) near transportation hubs needs to be allowed.	
			Earthquakes should not be an issue with today's engineering and technology	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_05-01-2023.pdf (pg 3-4)	5/1/23	Bill	Historic core of Hollywood is in jeopardy as is any affordable being built in the Regional Center due to upzoning.	
			Feasibility study requested by CPC confirmed concerns expressed by commissioners that additional upzoning in Regional Center would prohibit affordable being built in the area.	
			The Plan must have revisions and is a developer accommodating plan like the 2012 plan.	
			Supports Hollywood Heritage, LA Conservancy, Art Deco Society, and CHC. Historic buildings do not need to be lost to meet housing goals.	
			Repealing the Redevelopment plan is unnecessary	
			CPIO should effect areas where there are not historic buildings.	
https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_05-01-2023.pdf (pg 5)	5/1/23	Unknown	How could PLUM support the plan and how could CPC be concerned about upzoning in regional center beyond staff recommendations and then go against the concern of affordable housing being built due to feasibility study.	
			Upzoning in the Regional Center threatens Hollywood Historic resources (Grauman's Theatre, parts of Hollywood Boulevard, other landmarks)	
			Why is the Yamashiro shown as commercial and it's rezoning shown in a footnote	This is not a rezoning. The Proposed Plan is carrying forward Footnote #15 from the current Hollywood Community Plan as Footnote #4 in the Proposed Plan's General Plan Land Use Map. The footnote limits the development on these properties to a maximum floor area ratio of
			Character residential subareas have increases instead of showing how to keep these homes intact	

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https://clkrep.lacity.org/onlinedocs/2021/21-0934_PC_PM_05-01-2023.pdf (pg 6-7)	5/1/23	Fix The City	*Letter states that attachments are provided, but they are not attached to the Council File PDF.*	