

Communication from Public

Name: Fix the City

Date Submitted: 05/26/2023 11:33 AM

Council File No: 21-0934

Comments for Public Posting: Please see the attached communication on behalf of Fix the City.

Caroline Chiappetti
Bryce Gee
Dale Larson
Julia Michel †
Beverly Grossman Palmer
Salvador Pérez
Michael J. Strumwasser

May 26, 2023

Senior Counsel:
Andrea Sheridan Ordin
Fredric D. Woocher

VIA ONLINE SUBMISSION

Planning and Land Use Management Committee
200 North Spring Street, Room 395
Los Angeles, CA 90012

**Re: CF 21-0934 Hollywood Community Plan Update, May 22, 2023
Letter to PLUM from City Planning Department**

To the Members of the Planning and Land Use Management Committee:

On May 3, the City Council adopted the April 24 PLUM Committee report as amended by Motions from two sets of Councilmembers (Councilmember Raman and Hernandez and Councilmember Krekorian and Soto-Martinez). The PLUM Committee report recommended that the Council adopt the Hollywood Community Plan Update and findings, and the draft ordinance effectuating the Update's change of zone, along with the certification of the Environmental Impact Report and related documents, along with findings related to the General Plan amendments and environmental documents. Certain ordinances were to be prepared in the future by the City attorney, but Ordinance No. 187823, changing zoning throughout the Hollywood Community Plan area, was approved "forthwith." Additionally, on May 3, the Council purported to "reconsider" the April 14, 2014 amendments to the Framework Element. The Council did this all before a May 12, 2023 deadline that was triggered by the suspension of pandemic tolling of City deadlines.

On May 22, 2023, 10 days *after* that deadline, Director of City Planning Vincent Bertoni sent a letter to the PLUM Committee requesting that it rescind the zoning ordinance that Council adopted on May 3. Mr. Bertoni's letter noted that the April 23 PLUM Committee recommendation instructed the Department of City Planning to incorporate amendments requested by three different Council offices, yet the ordinance adopted on May 3 does not include those amendments. Mr. Bertoni warned that the inconsistency between the Plan and zoning ordinance was a problem under state law.

However, Mr. Bertoni's letter failed to discuss that the Council's consideration of the Hollywood Community Plan Update approved the zoning *in connection* with the approval of the plan itself. The Council did not separately

† Also admitted to practice
in Washington

vote on this ordinance; it was coupled with all of the other actions. The time for reconsideration has past.

Importantly, the May 12 time limit for the review of the Hollywood Community Plan Update has now *expired*. By operation of law, this means that the Plan Update is deemed denied, if it is reopened by Council.

What's more, the Council failed to present amendments to the General Plan (the Hollywood Community Plan Update) and the Framework Element Amendment to the City Planning Commission, as required by the Municipal Code.

For these reasons, the Council is required to present the amended General Plan and zoning ordinances together to the City Planning Commission. Moreover, as Fix the City previously pointed out, there has been no CEQA compliance for the Framework Element amendments. Council should vacate the entire May 3 action.

The City must prepare an EIR for the Framework Element amendment, and should therefore not couple this improper response to the prior Hollywood Community Plan litigation with the approval of the Hollywood Community Plan Update. The City can present the Hollywood specific materials to the City Planning Commission together with accurate draft ordinances and review those materials together, as appropriate for a full public understanding of what the Council intends to approve and how these ordinances will implement the Hollywood Community Plan..

Yours truly,

A handwritten signature in black ink, appearing to read "Beverly Grossman Palmer".

Beverly Grossman Palmer

Cc: Hydee Feldstein-Soto (by email)
Marvin Bonilla (by email)
Vincent Bertoni (by email)

