

Communication from Public

Name: The Silver Lake Heritage Trust

Date Submitted: 04/21/2023 10:02 AM

Council File No: 21-0934

Comments for Public Posting: To the PLUM Committee: We urge you to revise the Hollywood Community Plan Update (CF- 210934) recommended by City Planning. Specific changes that were missed by City Planning need to be made. I support Hollywood Heritage, the LA Conservancy, and the Planning Department's own Cultural Heritage Commission with their proposed alterations to this draconian plan. Please act today in support of our world-famous local landmarks, those places that make Hollywood a world-class destination. There is abundant research and data that shows preservation and housing creation are not in conflict with each other. It is not that difficult to find creative housing solutions that work in concert with historic preservation. To continually frame this as an "either/or" situation is simplistic at best, and in reality is very destructive to our community, as this faulty logic is frequently utilized to facilitate speculation, developer entitlements, and the demolition of our historic resources. Once these important sites are gone, they are gone forever. The Hollywood that many around the world come to see is rapidly vanishing. Let's plan smarter for the future of all Angelinos. I urge you to uphold years of hard work and protections gained by the preservation community. Please vote to change the Plan in order to promote a healthier, more vibrant, and historically important Hollywood. Thank You.

THE SILVER LAKE HERITAGE TRUST

April 21, 2023

To the PLUM Committee:

We urge you to revise the Hollywood Community Plan Update (CF-210934) recommended by City Planning. Specific changes that were missed by City Planning need to be made.

I support Hollywood Heritage, the LA Conservancy, and the Planning Department's own Cultural Heritage Commission with their proposed alterations to this draconian plan. Please act today in support of our world-famous local landmarks, those places that make Hollywood a world-class destination.

There is abundant research and data that shows preservation and housing creation are not in conflict with each other. It is not that difficult to find creative housing solutions that work in concert with historic preservation. To continually frame this as an "either/or" situation is simplistic at best, and in reality is very destructive to our community, as this faulty logic is frequently utilized to facilitate speculation, developer entitlements, and the demolition of our historic resources. Once these important sites are gone, they are gone forever. The Hollywood that many around the world come to see is rapidly vanishing.

Let's plan smarter for the future of all Angelinos. I urge you to uphold years of hard work and protections gained by the preservation community. Please vote to change the Plan in order to promote a healthier, more vibrant, and historically important Hollywood.

Thank you,
Carol Cetrone
President, The Silver Lake Heritage Trust

Communication from Public

Name: Emma Howard, Council District 13
Date Submitted: 04/21/2023 09:41 AM
Council File No: 21-0934
Comments for Public Posting: Letter from Councilmember Soto-Martinez regarding the Hollywood Community Plan Update.



HUGO SOTO-MARTINEZ
Councilmember, Thirteenth District

Honorable Members of the City Council
Planning and Land Use Management Committee (PLUM)
% City Clerk, City Hall
200 N Spring St, Room 395
Los Angeles, CA 90012

April 21, 2023

RE: Hollywood Community Plan Update CF# 21-0934

Honorable Members of the PLUM Committee,

Colleagues, it is my enormous privilege to represent such a large swath of Hollywood and East Hollywood, and a pleasure to share responsibility for our community plan area with the Honorable Councilmembers Yaroslavsky and Raman. The bulk of the work undertaken on the Hollywood Community Plan Update (HCPU) predates all of our work as the elected representatives of our districts as this plan has experienced a series of delays due to legal challenges and the COVID-19 pandemic.

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.

My second condition for support of this Plan is based on the understanding that the work of planning in Council District 13 for Hollywood and East Hollywood cannot and will not stop with this update. During this update process I expect to confirm further commitment of staff and resources to bring forward a more holistic and targeted updated planning effort starting immediately after Council approves the HCPU.

Requested changes to the Community Plan Implementation Overlay (CPIO) co-presented with Council Districts 4 and 5 are as follows:

- **Additional Tenant Protections.** The CPIO should include a more robust set of regulations to protect existing tenants in covenanted units or rented by lower or very low

income households. Such policies should include no net loss of dwelling units, one-to-one replacement of existing affordable units, occupant protections such as the Right to Remain, Relocation, and Right to Return.¹

- **Covenant Terms.** The CPIO should recognize the long term need for affordable housing by extending the minimum required covenant term for CPIO Affordable Housing Projects from 55 to 99 years.²
- **On-site Affordability Requirements.** The CPIO should maintain consistent affordability requirements for both parts of the Corridors Subarea by increasing the On-Site Restricted Affordable Units percentages required for Corridors 2 Subarea CPIO Affordable Housing Projects to match those required for Corridors 1 Subarea.
- **AB 2097.** While the CPIO contains various regulations that provide for parking flexibility for changes of use and other scenarios, due to the implementation of AB 2097 (2022) which prohibits the imposition of parking requirements in many instances the CPIO should be updated to reflect that the City can no longer require parking within a ½ mile of public transportation as defined in the bill. I thank the Department for including in their report a map of areas within the Hollywood Community where AB 2097 applies.³ I further encourage the department of City Planning to add a layer to the City's ZIMAs mapping application to show the citywide boundaries of AB2097 locations in much the same way as it displays applicable Transit Oriented Communities.

Requested changes to the CPIO unique to Council District 13 are as follows:

- **Additional regulations for Hotels.** Currently the plan requires a Conditional Use Permit (CUP) for Hotel projects that require the removal of residential units in the Regional Center subareas (RC1A, RC1B, RC2, RC3). I am asking for a prohibition of new hotels which require the removal of residential units in these areas.⁴
- **Additional Hotel Process.** Additionally I request that a CUP be required for any new hotel in the Regional Center Subareas, consistent with the procedures of Los Angeles Municipal Code Section 12.24.U.⁵ I am also requesting the following findings be made for any Hotel CUP reviewed under this process:
 - That there is sufficient market demand for the Hotel or transient occupancy residential structure project proposed;
 - That the hotel or transient occupancy residential structure project will not unduly and negatively impact demand in the City for affordable housing, public transit, child-care, and other social services, taking into consideration the impact of the

¹ Option 9 & 10, page 10 of the [April 18th City Planning Directors Memo](#).

² Option 8, page 9 of the [April 18th City Planning Directors Memo](#).

³ [AB 2097 Eligible Parcels In Hollywood Community Plan Area](#)

⁴ Option 18, page 13 of the [April 18th City Planning Directors Memo](#).

⁵ Option 17 with modifications, page 13 of the [April 18th City Planning Directors Memo](#).

part-time or seasonal nature of work at the hotel or transient occupancy residential structure project and of project employees' expected compensation;

- That the applicant will take measures to employ residents of neighborhoods adjoining the hotel or transient occupancy residential structure project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled;
 - whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation.
 - whether the hotel or transient occupancy residential structure project will displace or negatively impact small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services.
 - Whether the project will negatively affect the availability of affordable and rent-stabilized housing within the plan area. The project shall not demolish any building in which rent stabilized or restricted affordable housing existed in the last ten years or convert in whole or in part a building in which rent stabilized or restricted affordable housing existed in the last ten years to a hotel or transient occupancy residential structure.
- **Increased Affordability Levels in the Regional Center:** The Regional Center of Hollywood is a jobs rich, transit rich portion of Los Angeles, and it must at the very least incentivize affordability ranges that correspond with that of the higher Transit Oriented Communities Incentives already available in areas with fixed rail stations. I support alignment of TOC Tier 4 affordability levels in the CPIO.⁶
 - **Adjust Base FARS in the Regional Center Subareas.** To promote affordable housing production incentive the analysis provided by H&A Advisors indicates that de facto increases to the RC subarea base FARs will reduce the feasibility of overall production of onsite affordable housing even to below the current TOC requirement levels today. Therefore I request that base FARs in the Regional Center Subareas not be increased as recommended by the City Planning Commission. While I believe that the core of Hollywood would benefit from increased bonus density and I make this recommendation reluctantly, I cannot support FAR increases that would undercut the amount of onsite affordable housing possible for market rate projects until such time as incentive based affordable housing programs are replaced by mandatory inclusionary programs.⁷
 - **Reinforce Non-residential Public Benefit Incentives.** I support the recommendations to increase the required benefits offered by non residential projects, among them increased linkage fees, and increased publicly accessible open space.⁸

⁶ Option 12, page 10 of the [April 18th City Planning Directors Memo](#).

⁷ Option 3 & 11 page 6 & 10 of the [April 18th City Planning Directors Memo](#)

⁸ Option 6 & 7 page 8 & 9 of the [April 18th City Planning Directors Memo](#).

- **Amend the CPIO Historic Eligibility.** amend the CPIO to include survey eligible parcels with the California Historical Resources Status Code of 5S3 to the list of historic resources.⁹
- **Include Enhanced Demolition Review Procedures for National Register District.**¹⁰

Requested Additional Council District 13 Planning Tasks for Hollywood and East Hollywood Beyond the Hollywood Community Plan Update:

The work of planning is not a static work product, but an ongoing effort which can never be finished. The urgency to finish all 35 Community Plan Updates is related to the fact that land use policies need regular updates. Many of our plans are decades older than they should be. The Hollywood Community Plan Update does improve on the 1988 Plan, but it does not finish the essential work I believe is required for Hollywood and East Hollywood. 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. Further, this work must be done collaboratively with the diverse communities of CD13.

Critically, this Hollywood Community Plan Update made no fundamental changes in East Hollywood- the area of the Hollywood Community Plan which has the lowest income populations. Within the HCPU there are expanded zoning protections in the CPIO for tenants particularly if PLUM makes the changes recommended in our Council letters, yet East Hollywood renters have no access to those protections as they are not included in the CPIO areas. Without any additional protections in East Hollywood, displacement will continue to occur.

I also believe that the overall density in the Hollywood Regional Center is too low. The HCPU caps available bonus Floor Area Ratios around 6.75:1. I strongly support increasing both the base and bonus FAR for Hollywood- when additional provisions for onsite affordable housing requirements can be made. Hollywood is a jobs and transit rich area, one which is globally famous. We must do more to promote economic growth and ensure through our land use and zoning that it is a thriving and just area for residents, workers and visitors.

I am prepared to vote in support of this plan only with the public assurance that the Planning Department will allocate resources for a targeted zoning and land use update within CD13 in the Hollywood and East Hollywood areas directly following the adoption of the HCPU. The residents of my district cannot wait another 40 years for this work.

I thank Mayor Karen Bass for her strong support as demonstrated by Exhibit H of the Mayor's Proposed 2023-2024 Budget.¹¹ I am seeking that same support at the Planning and Land Use Management Committee hearing and a public verbal affirmation from Director Bertoni that he will put his most experienced available community planners, hopefully including staff who have

⁹ Option 4, page 7 of the [April 18th City Planning Directors Memo](#).

¹⁰ Option 5, page 7 of the [April 18th City Planning Directors Memo](#).

¹¹ Exhibit H, #6, PDF page 53 of the [Mayor's Proposed 2023-2024 Budget](#)

worked on high density recent plan areas to work as soon as the Hollywood Community Plan Update passes City Council.

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 targeted anti displacement provisions which match or supersede those offered in the CPIO to prevent the loss of existing affordable housing.
- Define and promote the use of alternative housing models in the plan- such as social housing, land trusts, co-op housing and limited equity cooperatives.
- Expand targeted demolition controls to prevent the loss of tenants and historic resources before projects are approved.

Community Engagement and Benefits:

- Fully analyze the effects of the SNAP with community leaders, revise or adapt the SNAP where it's not working as intended.
- Develop a robust Community Benefits program to increase value capture on non-residential projects and support investment in community priorities when new development is generated under the updated land uses.

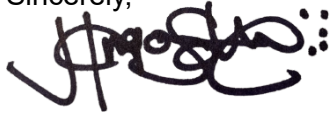
Sustainability & Safety:

- Reduce and disincentivize future car-centric uses.
- Incorporate transit measures for workers in new large scale employment uses.
- Waive street widenings administratively, and automate for affordable housing projects.
- Study the earthquake resilience in Hollywood, and consider setting more restrictive requirements on new buildings within the area to ensure they do not fail in major earthquakes.

- Require additional sustainability measures in large projects.
- Undertake additional environmental justice measures.

I thank the staff at the Department of City Planning for their work in preparing this and all our Community Plans and General Plan Framework Elements and look forward to working with them and this committee on furthering our shared goals for Hollywood.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Hugo Soto-Martinez', with a stylized flourish at the end.

Hugo Soto-Martinez
Los Angeles City Councilmember, 13th District

CC: Vince Bertoni, Director, Los Angeles City Planning Department
Craig Weber, Principal City Planner, Los Angeles City Planning Department
Priya Mehendale, Senior City Planner, Los Angeles City Planning Department
Honorable Councilmember Raman, Los Angeles City Council, 4th District
Honorable Councilmember Yaroslavsky, Los Angeles City Council, 5th District