



June 15, 2016

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

Submitted electronically

Linda Lou, Community Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667 mail stop 395
Los Angeles, CA 90012
Phone: 213.978.1473
Email: linda.lou@lacity.org

**RE: Notice of Preparation (NOP) of a Draft Environmental Impact
Report (Draft EIR) for the Hollywood Community Plan Update**

Dear Ms. Lou,

On behalf of the Los Angeles Conservancy I am writing to submit comments on the City's Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the Hollywood Community Plan Update. The Conservancy, along with Hollywood Heritage, has long been active in protecting the historic resources in Hollywood. Our comments are intended to help guide the discussions and planning for the rich heritage and historic resources that currently exist throughout Hollywood.

In 2011 the Conservancy previously commented on the prior update to the Hollywood Community Plan. At that time we were concerned that potentially significant adverse impacts to historic resources were not fully evaluated in the Draft EIR. Our goal then and now is to ensure there are adequate long-term protections in place and that the Plan can help mitigate adverse impacts while developing meaningful tools and incentives to shape future growth in Hollywood without sacrificing its irreplaceable heritage.

I. Historic and Cultural Resources in Hollywood

With development starting prior to its establishment as an independent city in 1903, and growing exponentially in the first few decades after it consolidated with the City of Los Angeles in 1910, Hollywood has one of the highest concentrations of designated historic resources in the City of Los Angeles. The Plan boundary area alone includes more than 150 Los Angeles Historic-Cultural Monuments (HCMs),



representing approximately fifteen percent of all HCMs in the city. The Plan boundary area also includes several historic districts at the national, state, and local levels (called Historic Preservation Overlay Zones or HPOZs in the City of Los Angeles), including the nationally recognized Hollywood Boulevard Commercial and Entertainment District (Hollywood Blvd.).

A. Maps locating identified historic resources should be included and overlaid with development goals and land use changes in the Proposed Plan

Identifying and locating all known historic resources is the first step in understanding how the Plan may impact these resources. The previous plan update had some shortcomings in this aspect, in terms of how it did not fully illustrate Hollywood's historic resources, in terms of ease of identification and understanding in relation to proposed development goals. The Plan should articulate – both graphically and in data form – a clear understanding of the survey results to better plan for preservation and development in the future. We understand all survey data will now be fully incorporated and included in the Plan which is a great improvement.

Perhaps this is the intent now but the Plan should include maps illustrating locations of all identified historic resources, including the existing HCMs, HPOZs and the California and National Register historic districts. These should be overlaid with any proposed land use changes or any Floor Area Ratio (FAR) Incentive Area(s) put forth in the proposed Plan. Inclusion of such graphic representations would greatly increase the understanding of how the Plan will impact various types of historic resources and districts, and hopefully facilitate development of more nuanced and specific planning tools to protect them.

B. The Plan's potential impacts on historic resources should be fully identified

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."¹ CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."² Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.³

The previous plan update and Draft EIR statements concluded that adoption of the Plan "could result in development projects affecting properties listed or eligible," for the National Register, California Register,

¹ Public Resource Code, Sec. 21001 (b),(c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

³ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.



or designated as an HCM or eligible for inclusion or part of an HPOZ, and that “development incentives contained in the Plan may spur increased development activity in certain areas that contain historic resources.” However, no evaluation or technical report was provided to substantiate this conclusion. This was a problem then and would be again if not fully addressed in the Draft EIR. Without this type of analysis, it is difficult to ascertain which or how development incentives may increase activities in areas with historic resources, or what mitigation measures could substantially lessen or avoid adverse impacts to historic resources.

At a minimum, direct and cumulative impacts of height district, zoning, and plan amendment changes proposed for and adjacent to areas with identified national or local historic districts should be evaluated. For instance, the areas south of Hollywood Blvd were previously targeted for a height district change that, according to the matrix of land use changes at the time, appeared to increase the FAR from 2:1 to 3:1. The eastern end of the district at Vine Street proposed incentives and the ability to build up to a 6:1 FAR. The impacts of these types of changes on individual resources, as well as on the district as a whole, should be evaluated and mitigated in the upcoming Draft EIR, as needed to plan for and direct development pressures away from historic resources.

The implications of these previous, and other proposed changes, as well as the potential to increase or decrease development pressures on historic resources should be fully detailed and evaluated in the Draft EIR. Such evaluation should extend to individually listed resources as well as potentially eligible historic districts or concentrations of survey-identified resources. Further, a map with the land use and zone changes overlaid with identified and potential historic resources could pinpoint areas for additional study.

The Conservancy expects that this base level of documentation and coordination with proposed planning and land use measures will be provided in the Plan. We hope this will address the insufficient data provided in the previous plan update, instead allowing for a coherent or user-friendly approach that determines how development will impact specific historic resources.

The Hollywood community, and the remaining built environment reflecting its early heritage, has been greatly impacted by development pressures in recent years, with many resources lost. The Plan should foster an appreciation for Hollywood’s remaining historic resources and attempt to provide a fully transparent process that guides and balances the need for carefully-planned growth as well as preservation.

II. The Draft EIR should include preservation alternatives and mitigation measures that minimize or avoid adverse impacts on historic resources in Hollywood

As previously stated, the Conservancy had previous concerns regarding the Plan which included statements within the DEIR saying development projects may affect historic resources without any substantive evaluation of these impacts. If there are known impacts, the DEIR should evaluate a “range of



reasonable alternatives...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.”⁴

A. Meaningful mitigation measures should be developed that include tools, incentives, and implementation strategies to direct development to appropriate areas within Hollywood and away from historic resources where possible.

Among a number of mitigation measures to consider is a transfer of development right (TDR) program specifically to protect historic resources most at risk from current or anticipated development pressures. This may be particularly important for Hollywood Boulevard, the anchor of historic Hollywood and a particularly fragile resource where past development pressures have already started to chip away at the cohesive nature of the boulevard and district. The proposed zone and height district changes for lots north and south of the boulevard, and in the Regional Center area at Hollywood and Vine, may direct development toward historic resources like the one-story contributors along Hollywood Blvd or the existing collection of multi-family housing north of the boulevard.

A TDR program that allows transfer or sale of unused air space rights from low-scaled contributors to adjacent lots that can accommodate additional development can effectively protect Hollywood Boulevard, if such transfers are linked to the protection and maintenance of the historic resources.

Another possible mitigation measure might be a provision to prevent preemptive demolitions that state no demolition permits shall be issued for identified or potential historic resources prior to the issuance of a building permit for a replacement project.

Other incentive programs could seek opportunities to link goals of the Plan to an appropriate reuse of existing historic resources, including:

1. Incentivizing studios to encourage employee housing in bungalow courts and other housing types originally constructed for studio housing, and adjacent to nearby studio employers. This type of incentive program has been successfully implemented elsewhere, most notably with universities and colleges that encourage employees to support and reinvest in the surrounding community, while also maintaining a more walk and bicycle-friendly environment.
2. Incorporating development and preservation with smart growth and sustainability principles. The reinvestment, reuse and “greening” of the existing building stock – including Hollywood’s historic and older buildings – is a fundamental of sustainable development that can improve energy efficiency, reduce carbon usage, and be employed to combat climate change.

⁴ State CEQA Guidelines §15126.6(a).



III. Conclusion

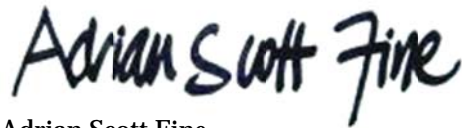
The Hollywood Community Plan is important not only for the immediate community but all of Los Angeles. We commend the City and the Department of City Planning for moving this project forward again and acknowledge the long efforts and time that has already been expended toward this project throughout the recent years. In this latest iteration of the Plan, the Conservancy hopes greater attention will be placed on 1) clearly articulating current and eligible historic resources; 2) possible impacts; 3) preservation alternatives; and 4) appropriate mitigation measures.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the NOP regarding the upcoming Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Office of Historic Resources, Department of City Planning
City Council, City of Los Angeles
Hollywood Heritage, Inc.

