



January 31, 2019

Submitted electronically

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**RE: Draft Environmental Impact Report (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 Draft Environmental Impact Report (EIR) for the Hollywood Community Plan Update. Hollywood and its historic resources are core priorities for the Conservancy, along with our partner Hollywood Heritage. Our comments now and in our June 15, 2016 Notice of Preparation (NOP) letter are intended to help strengthen the Plan and ensure a long-term planning process that promotes and plans for the heritage of Hollywood. As you will see, we are reiterating some previous comments and suggestions as they do not appear to have been addressed in the EIR.

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.

We commend the City for preparing a thoughtful plan that attempts to foster sensitive growth while respecting and protecting historic properties and neighborhood character. It is a important step in the right direction but it can be further improved with some key actions taken, which are included in our recommendations.



The plan area contains one of the highest concentrations of designated historic resources in the city, as the 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 fully accurate and up-to-date, including overlays with development goals and land use changes to indicate potential conflicts

The Plan should articulate – both graphically and in data form – a clear and consistent understanding of the survey results to better plan for preservation and development in the future. Mapping all known historic resources is a key step in understanding how the Plan may impact these resources. While the Plan is an improvement over previous iterations, there seems to be some inconsistencies and errors in various maps and charts provided to date. We suggest City Planning revisit these and consult with its Office of Historic Resources to ensure greater accuracy in any final plan prior to adoption.

The Plan includes updates to land use designations and zones to accommodate future growth. Given that, we strongly recommend mapping that indicates growth areas and potential conflicts with historic resources through a series of overlay maps. 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 specifically impact various types of historic resources and districts, and hopefully facilitate development of more nuanced and specific planning tools to protect them. Based on the specific impacts, mitigation measures could be identified and implemented in the final Plan.

The 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, or designated as an HCM or eligible for inclusion or part of an HPOZ, and states that “development incentives contained in the Plan may spur increased development activity in certain areas that contain historic resources.” However, no substantive details are provided to substantiate this conclusion. This was a problem then and would be again if not fully addressed in the 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 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 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, and allow 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.

B. The Draft EIR should include mitigation measures that can help minimize adverse impacts on historic resources in Hollywood

As previously stated, the Conservancy had concerns regarding the Plan which included statements within the EIR saying development projects may affect historic resources without any substantive evaluation of these impacts. Given there are known impacts, 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 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.

C. The Community Plan Implementation Overlay (CPIO) District should be implemented upon the Plan's adoption, and strengthened in scope to adequately ensure protection for all designated and eligible historic resources

We are very pleased to see a Community Plan Implementation Overlay (CPIO) Districts proposed to help carry out the goals and objectives of the Plan. It can be an effective tool to help manage growth and conserve character. As proposed the Hollywood CPIO proposes regulatory protections for designated historic resources and pedestrian-oriented design standards. It requires that the rehabilitation of designated resources comply with the Secretary of the Interior's Standards and restricts applicants from obtaining a demolition permit without an approved replacement project.

The CPIO is an important tool and step in the right direction. However it does not go far enough, as it should encompass all eligible historic resources within the CPIO boundaries, not just those that are designated. This should include design review of new buildings to achieve consistency by creating continuity between the historic resources and new development proposed. This approach has been accomplished elsewhere in Los Angeles, including the Miracle Mile Community Design Overlay (CDO) district. For instance, as requested for Hollywood, the Miracle Mile CDO includes design standards that apply to all structures that are listed or determined eligible.

D. Conclusion

Prior to the issuance of the Final EIR, the Conservancy urges greater attention to be placed on 1) clearly articulating current and eligible historic resources and ensure accuracy in all maps, charts and text; 2) map all possible impacts to historic resources through overlays to identify conflicts; 3) strengthening the CPIO tool to adequately ensure protections for designated and eligible historic resources; and 4) including an appropriate range of mitigation measures.

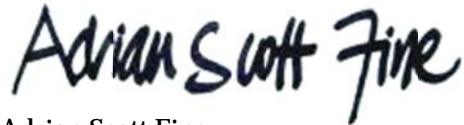


About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 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 City's Draft Environmental Impact Report (EIR) 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.

