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City of Los Angeles Department of City Planning
Linda Lou, Community Planner
200 N. Spring Street, Room 667, Mail Stop 395
Los Angeles, CA 90012

Beachwood Canyon Neighborhood
Bel-Air Association
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
CASM-SFV
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Lookout Mountain Alliance
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Rancho Verdugo Estates
Residents of Beverly Glen
Roscomare Valley Assn.
Save Coldwater Canyon!
Save Sunset Blvd.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

June 13, 2016

Re: Response to Notice of Preparation
Proposed Hollywood Community Plan Update
ENV-2016-1451-EIR

Dear Ms. Lou:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. At its meeting of June 1, 2016, the Hillside Federation board discussed the Draft Environmental Impact Report for the Proposed Hollywood Community Plan Update (ENV-2016-1451-EIR) and are pleased to offer these comments.

The Hillside Federation previously supported the 2012 Hollywood Community Plan's policies to protect hillside neighborhoods. *See* 2012 Hollywood Community Plan, Policies L.U.1.28–1.36, pp.72-73, and the Federation's letter of April 16, 2012 (attached as Exh. A). We are very pleased that those policies remain and would oppose any weakening of programs and policies for hillside neighborhood areas.

Despite passage of the Baseline Hillside Ordinance in 2011, a number of hillside issues have arisen that should be studied as part of the HCP update's Draft Environmental Impact Report. These include:

- Increased hillside construction on lots previously considered “unbuildable” requires mapping of extreme slopes in the hillside geographical areas of the Hollywood Community Plan area to allow better understanding of potentially significant environmental impacts;

CHAIRS EMERITI
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Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Polly Ward

- Increased construction on substandard roads requires improved notification for “B” permit activity and any requested waiver of Hillside Ordinance requirements to increase street width or otherwise improve substandard roadways (those less than 20 feet wide);
- Whether additional infrastructure improvements are needed that could further mitigate impacts of development in the Hollywood hillside areas.

Other general issues of concern with the Hollywood Community Plan Update include:

- Increased densification along traffic corridors and the lack of sufficiently robust transportation infrastructure to accommodate projected density increases;
- Moving the primary responsibility for the Geology section of the Environmental Impact Report to the California Geological Survey and the State Geologist, especially with respect to limiting building for human habitation in the vicinity of the Hollywood fault and any other seismic zones;
- Maximizing community plan outreach for the Hollywood Community Plan update to community members through various modes, including the Hollywood Council Districts, homeowner groups, the Hillside Federation and other community organizations, neighborhood councils, and social media sites and platforms.

As the City acknowledges, “Community Plans are the blueprint for guiding change in the City,” which “provide the basis for where and what type of buildings are constructed and regulate how those buildings are used.” Dept. of City Planning, HCP Update Scoping Meeting handout, p.2 (May 17, 2016). Fundamental goals of the Hollywood Community Plan update include “[m]aintain[ing] land use and zoning consistency” and “preserv[ing] single-family residential neighborhoods.” *Id.* The DEIR for the Hollywood Community Plan must be detailed and accurate, and the public process toward passage of the updated community plan must be entirely transparent. Increased community outreach during the update process will be critical to ensuring both accuracy and transparency.

Thank you for your consideration.

Sincerely,

Charley Mims

Charley Mims

EXHIBIT A

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PLUM Committee
City Hall
200 N. Spring Street
Los Angeles, CA 90012
April 16, 2012

Re: Hollywood Community Plan
CPC-2005-6082-CPU, CPC-1997-43-CPU

Dear Councilmembers:

Beachwood Canyon Neighborhood
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Canyon Back Alliance
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
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Oaks Homeowners Assn.
Outpost Estates Homeowners
Pacific Palisades Residents Assn.
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents thirty-eight homeowner and residents associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and the quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live. Therefore the Hillside Federation supports the Hollywood Community Plan.

The Federation is pleased with the inclusion of the Baseline Hillside Ordinance, the Slope Density Ordinance, both of which were developed with the assistance of the Federation, and the upcoming Ridgeline Protection Ordinance and Retaining Wall Ordinance. A great deal of community input was taken and many specific local requests were incorporated into the plan. There is much in the plan which is to be commended.

However, there is one issue that continues to be of concern to the Federation—the amount of densification that is planned along the transit corridors. Are the population projections upon which the densification is based accurate? If the population is declining, do we need more densification? Given that the city already has water restrictions, traffic is already at a standstill, and our emergency services are already stretched, can the city afford to increase density? We don't want developers building out-of-scale and excessive height projects now when there is no demand to justify it.

The Hillside Federation urges the City to reexamine the population projections and the proposed densification to see if it is really justified.

Sincerely,

Marian Dodge

Marian Dodge, President

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Polly Ward

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