



Linda Lou <linda.lou@lacity.org>

Comments on April 29, 2016 NOP for Hywd Com Plan, Suggestions of DEIR

1 message

Richard MacNaughton <macnaughtonesq@gmail.com>
To: Linda.Lou@lacity.org, Richard MacNaughton <macnaughtonesq@gmail.com>

Mon, May 23, 2016 at 5:24 PM

Dear Ms. Lou,

Please add the following to the public record;

- (1) My letter of this date
- (2) the 11-23-2015 HELP and CCLA letter concerning the Crossroads project which I reference in my comments.

Thanks

Richard MacNaughton, Esq.

2 attachments

[2016-5-23 Areas of Study for HCP2 DEIR.pdf](#)
331K

[2015-11-23 HELP CCLA Crossroads.pdf](#)
323K

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Monday, May 23, 2016

Email. Linda.lou@lacity.org

Ms. Linda Lou
City of Los Angeles, Department of Planning
200 N. Spring Street, Room 667 mail stop 395
Los Angeles, California 90012

RE: Quality of Life for Hollywoodians Should be Focus of the Hollywood Community Plan

1. Use Accurate Population Data
2. The DownSizing-DownZoning Alternative for the DEIR
3. The Need to Study Virtual Presence as a Mode of Transportation

Dear Ms. Lou:

This office represents the following unincorporated associations all of which are concerned about the inadequacies of the Notice of Preparation for the Hollywood Community Plan Update [HCP2].

1. Hollywoodians Encouraging Logical Planning, an unincorporated association [HELP],
2. Citizens Coalition Los Angeles, an unincorporated association [CCLA],
3. SaveHollywood.org aka People for Livable Communities, an unincorporated association [SaveHywd], and
4. Hollywood Advocates, an unincorporated association

In addition to their prior individual and collective objections to the NOP, they are joining to make known the need for the Draft Environment Impact Study to do the following:

1. Use Accurate Population Data
2. The DownSizing-DownZoning Alternative for the DEIR
3. The Need to study Virtual Presence as a Mode of Transportation

1. The Need to Use Accurate Population Data:

Accurate population data requires that the DEIR find the most reliable population data and present it in manner which provides the best information to the public to understand the demographic dynamics that are at play in Hollywood. The DEIR needs to trace not only the historic trends, but also to explain the factors which affect those trends.

The sub populations require special attention and in this connection the DEIR needs to study the various ethnic groups in Hollywood and how they interact with the Los Angeles Unified School District [LAUSD]. A quality education is essential for upward mobile communities and the poor quality of the LAUSD is a factor which impacts who will live in Hollywood.

To what extent will a subgroup such as Armenians or Chinese families have their own schools either in lieu of attending the public schools are in addition to public school? The quality of the schools affects family oriented cultures and many family oriented cultures prefer single family homes to apartments. Thus, the subgroup's educational needs and housing needs are linked together. If Hollywood adds more apartments and continues to spot zone away single family homes, the DEIR needs to study the negative impacts such policies decisions with have on educationally oriented upward mobile families.

What will be the impact on such cultures if the City pursues policies which are oriented to young singles and the elderly without providing more attention to the needs of families. The availability of parks and sports fields is tied to family life for many cultures. There appears to be a policy to commercialize playing areas and to move them into the wilderness parks of Griffith Park (baseball) and Runyon Canyon (basketball). What are the plans for soccer fields for cultures which have large soccer fans such as Hispanics and Armenians. Will they too be constructed in inaccessible portions of the wilderness parks north of where the youth live?

The City cannot make sensible plans for the future within providing a more detailed population breakdown of the subgroups within Hollywood. Is it realistic to expect the Korean Community to move northward into Hollywood?

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In order to make a proper assessment of the subgroups in Hollywood and those likely to establish a significant presence in Hollywood in the next few decades, the City needs to also study their age groupings including their birth rate, average age at which they marry, and their choice of homes when rearing families.

Without knowing the ages of various subgroups, it is impossible to make rational decisions for the future. Millennials of all ethnic, racial and religious subgroups are entering into the child rearing age. Statistically, their life style dramatically change and they leave apartment living for single family homes near good jobs. The year 2015 is the peak year for Millennials in that twenty-five years ago, they had the their maximum birth rate and from that point onward, fewer and fewer Millennials were born. Thus, as Millennials are moving into the childbearing years, they will be moving away from apartment living and looking for single family homes, but there will be a decreasing number of Millennials to replace them.

This demographic trend portends an ever increasing vacancy rate of apartments while the demand for single family homes will increase. If the demand for the Millennials over the age 25 to have a place for family life is not met in Hollywood, they will move away. Each year that Millennials transition from the post-college Dorm Room style to the family home with a yard style, the demand for single family homes will rise while the demand for apartments will decrease.

Unless the demand for family homes can be satisfied in or near to Hollywood (cross reference Virtual Presence), Hollywood will lose an important part of its population, i.e. the productive family breadwinners. Employers shun places where families are leaving as employers know that the stability of their companies depend on a stable workforce. If it is true that Hollywood's population is dumb belling with a lumping among the young and elderly but thinning in the stable breadwinner demographic, employers will not want to relocate to Hollywood or stay in Hollywood.

The exodus of the breadwinner demographic and the departure of employers go hand-in-hand. These issues are inter-related. Hollywood cannot become unfriendly to families by loading up on apartments and bad schools without both employers and workers moving elsewhere.

(A) The Impact of the anti-Mansionization Movement

While the impetus of the anti-Mansionization Movement is to preserve stable single family neighborhoods, the draconian building limitations will makes thousands of R-1 homes in and near Hollywood inadequate for family life. The fear of the anti-Mansion people that the city and developers will take any chance they have aggrandize homes to the point that the character of the neighborhood is destroyed is realistic. Nonetheless, there needs to be a rational way to remodel older homes to accommodate the life styles which are advancing upon us.

Many older homes lack master bedroom suites, home offices, and the kitchen-family-great room complex with flows out on to patios. The City needs to study substituting strict style requirements for the square footage limitations and the City needs to study the wider use of basements to add useable space to older homes. If Hollywood expects to be a place which can hold on to its employers, it needs to provide more ample housing for employees with families.

(B) The Need To Parse The Data on Millennials

The data strongly suggests that apartments are harmful to the longer term health of Hollywood, but instead of more small apartments, Hollywood needs to provide for more space, larger homes with yards. Hollywood is competing not with Manhattan but with Chatsworth and Austin, Texas. Demographics tell us that Hollywood cannot throw its lot with the dwindling number of Millennials.

Another factors will hasten the exit of the Millennials. The improving economy is one of them and the new opportunity centers which are maturing in other parts of the country such as South Texas, the Carolinas, Georgia and even some in the Snow Belt. Virtual Presence is making smaller cities like Sacramento more attractive to families. In an information society, more jobs can be done via Telecommuting with fewer trips to the central employer. Silicone Valley can now have its employers spreading out towards Sacramento.

The impact on Hollywood of what small cities can attract with Virtual Presence is that a densely packed Hollywood will not be able to compete with these more livable areas. If Hollywood continues to construct apartments and promote mega

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projects which will make traffic congestion unbearable, Hollywood will make itself inhospitable to both employers and families.

Thus, the DEIR has to study the subgroups which comprise Hollywood and study where those groups will likely be in 5, 10 and 20 years. None of the demographic data which we have seen support the notion that Hollywood can become a viable community with decent employment unless it DownSizes and DownZones (see *infra*) so that Hollywood becomes family oriented. The quality of life of its residents is more important than developers' profits from building high rises.

On its present trajectory, Hollywood is oriented toward young transients and the elderly. In signing his 17th Executive Order on May 18, 2016, Mayor Garcetti stated:

L.A.'s older adult population is expected to grow dramatically in the coming years. In Los Angeles County, the number of adults 65 and older is expected to nearly double to more than 2.1 million by 2030. There are about a half-million residents age 60 and older in the City of Los Angeles — a number that is expected to increase by 50% over the next two decades. *Mayor Eric Garcetti at May 18, 2016 signing ceremony*

Thus, Hollywood's percentage of elderly will increase over the next decades but that increase in the elderly does not involve old people moving here. They are already in Hollywood. The death rate has significantly decreased. Thus, the elderly are a significant component of the city's slow population increase. More people are leaving Los Angeles than are coming here, but it is the family breadwinner demographic which is departing. Thus, Hollywood faces a demographic problem of an aging population which deters new employers from moving into Hollywood. While a geriatric population has many good qualities such as a very low crime rate, they do not provide a good employment base.

Hollywood cannot afford to become any more family-unfriendly. A family-unfriendly town such as Hollywood is an employer-unfriendly town. Unless the City takes immediate steps to expand its supply of single-family homes both in Hollywood and nearby places in The Basin, the City will find it increasingly harder to attract new businesses and harder to retain the employers which it has.

(C) The Cirque du Soleil Experience

The experience of Cirque du Soleil is illustrative. As an entertainment venue, planners thought that it was worth \$30 Million to change the new Kodak Theater so that Cirque du Soleil would become a 30 year anchor tenant. Planners foolishly thought that its placement over a subway station would guarantee attendance. Cirque du Soleil lasted two years before leaving. That was \$15 Million per year. While the planners were convinced that it would be a huge success and revitalize Hollywood-Highland, it was a disaster. The Cirque du Soleil story is more applicable to employers. After all, Cirque du Soleil was entertainment. People go to Las Vegas to see Cirque du Soleil. Surely they will go to Hollywood, the entertainment capital of the world. The City planners and the developers were 100% wrong, but we see that the NOP is setting us down the same path.

As Judge Alan Goodman remarked when he rejected the last Hollywood Community Plan, the city relies on fatally flawed data and wishful thinking. Hollywood producers manufacture the dreams but always with their eye on the bottom-line and that requires a thorough knowledge of demographics. The City's plan for Hollywood is illusion and pixie dust.

In an endeavor to turn Hollywood in Manhattan West, the city has loaded Hollywood with a glut of ugly apartments designed for a diminishing demographic. The hey day of the glorified dorm rooms is over. The problems facing Hollywood are monumental, but the City ignores reality in order to pursue a fantasy.

The type projects which The City is approving for Hollywood are a formula for disaster. Gail Goldberg warned the City in 2006 when she was in-coming Director Planning that allowing developers to set the zoning they wanted for their projects rather than making developer's buildings conform to the zoning law was leading to disaster.

2. The DEIR Needs to Study the DownSizing-DownZoning Alternative [Ds-Dz Alternative]

The City needs to understand that the type projects it is approving are harmful to Hollywood's viability, but rather the City needs to study the opposite approach, i.e.

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the DownSizing-DownZong Alternative [Ds-Dz Alternative]. The population data since 1990 shows that Hollywood is a more viable community with a higher quality of life for Hollywoodians with less density. The first step is for the City to recognize the harmful direction which Hollywood is taking with its densification.

The densification push from City Hall is actually illegal under the General Plan as the Community Plans may not encourage growth or retard growth, but the community plans have to allow for growth. Since 2001, Hollywood has been in violation of the City's General Plan by actively encouraging growth which otherwise would not come to Hollywood. There is strong resistance to the forced-increase in population density. Although the forced densification has been a failure, it still has adversely impacted Hollywood. Yet, the City persists in its forced densification of Hollywood by promoting projects which the residents do not want.

(A) The Disasters of the Mega-density Projects

The Palladium project, for example, plans to attract an absurdly high number of new people into a 1/4 square block area. HELP's and CCLA's comments on The Palladium describe some of the adverse impacts the Project would have on Hollywood – assuming it can rent its units. The HCP2 is bringing the troubles to Hollywood.

1. The Project Will Add 8 Linear Miles of Additional Living Units to $\frac{1}{2}$ Square Block in Hollywood

At the outset it is beneficial to grasp the number of additional homes which this project will be adding roughly one-quarter of square block in Hollywood.

Because it is difficult to visualize the increased population density of high rise which are 30 stories high, HELP & CCLA use the concept of Linear Miles. Linear miles take the total number of additional living units and multiples them by 60 feet, which is the average width of a R-1 lot. Then we divide that number of 5,280 which is the number of feet in a mile.

Thus, Linear Miles tells us how far all these new condos and apartments

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would stretch if they were modest single family homes sitting side by side.

This Project proposes to add the equivalent of over 8 Linear Miles of new homes within one square block.

2. How Long is 8 Linear Miles?

When we take the time to visualize these distances, we can better comprehend the additional density which The Project will bring to one-quarter square block. Eight Linear Miles of homes would stretch from this Project site at 6201 Sunset all the way to Los Angeles City Hall in downtown and still have another mile of homes.

When we realize how many additional people will be crammed into this small area, we begin to realize that Hollywood cannot accommodate this population increase. People do not stay home in their tiny apartments all day; they go out and the do things.

3. What will be the Impact of 8 Linear Miles of Additional Population in one-quarter Square Block?

People tend to look at the pretty pictures of the buildings and listen to the platitudes which accompany them. When one is concerned about the impact this population increase will have upon Hollywood, we have to take some time to get an understanding of how all these additional people will affect life in Hollywood. Not only will they need cars in order to get around Los Angeles, but they make demands on our water supply. Already, we have water mains bursting about one or two per week. Our system is too antiquated to serve the people who live here now. The same is true for all our infrastructure. Police, firemen and paramedics are part of the infrastructure and they cost money, but the City has no money. Not only does the city give money to developers like CIM Group, but it does not charge them the required developer fees.

It is hard to see the harm Hollywoodians suffer from the over-burdened infrastructure. If it takes the paramedics an extra 10 minutes to get to the elderly woman up the street and she dies for lack of prompt emergency care, one cannot see the connection between too many emergencies and too few paramedics. When the crime rate increases as has been happening in

Hollywood, one cannot see the connection between the police being spread too thin and criminals being more bold due to lack of community policing. It certainly is not the police officers' fault; they can only be in one place at one time. What we do see is the traffic congestion and the inability to find a parking space.

4. The Increase in Automobiles Will be More Than Hollywood Can Handle

The claim that people who live in these Transit Oriented Districts will use the subway has been proven to be false. Almost every family who can afford a car who lives in a TOD will have a car. The subway cannot substitute for a car because the subway covers only 5% to 10% of the City.¹

The traffic congestion and the inability to find parking are both real problems and stand-ins for the other harder to perceive harm which come from excessive population density. Thus, the city actively misleads citizens about how it is solving the traffic problem with fixed-rail transit. The word charade is too mild to describe the materially misleading propaganda the city has been feeding the public about how more subways and more trolleys will solve all the transportation problems.

The reality is that for the overwhelming majority of Angelenos is at best a necessary evil which they will shun as soon as they can afford to do so. As the Metro's own data shows, when "illegals" were recently permitted to obtain drivers' licenses, subway ridership significantly declined.

Over the last 20 years per person ridership on L.A. County's mass transit has declined. Building TODs does not cause people to use the subway. Rather cars follow the people. When the per mile population increases, the number of cars in that same area increases.

¹

The 1915 *Study of Street Traffic Conditions in the City of Los Angeles* conducted by the City's Bureau of Engineering has been submitted to the City many times in the last decade. Nonetheless, the City persists in ignoring this landmark study and excludes it from the materials for the public record. Thus, once again HELP & CCLA are adding the 1915 Study to the public record for this Project.

5. Vehicle Ownership Does Not Decrease for People Who Live in Transit Oriented Districts

The rate of car ownership per household does not decrease for people who live in Transit Oriented Districts. Poverty correlates to lack of ownership. When one adjusts for more poor people living near transit hubs, one's wealth determines whether they are likely to own a car. This correlation was established for Los Angeles County back in 1999, but the City refuses to share this data, but instead it sets forth the false claim that people who live in Transit Oriented Districts will not own cars and they will use the subway and bus. A similarly false claim is made for this Project. [*The Relation Between Transit Availability and Automobile Ownership: the Case of Los Angeles County*, University of New Orleans, School of Urban and Public Affairs, by Devajyoti Deka, 1-1-1999]

6. How to Calculate the Number of Additional Vehicles in Hollywood

The Project proposes 731 units will be for wealthier people, we can use the average number of cars per person. For Los Angeles that is .54 vehicles per person. [December 30, 2010, Streetblog, *Density, Car Ownership, and What It Means for the Future of Los Angeles*, by Damien Newton.] In other words, one car for every two people.

If we assume that there will be an average of two people per unit in the Project, that means a minimum of 731 additional cars in a one-quarter square block area. The average car is about 15 feet long. 731 cars x 15 feet equals feet or about 2 miles of cars stretched end to end. The freeway entrance at Van Ness and Sunset is only $\frac{1}{2}$ mile from the Project. Thus, the number of additional cars which will be added will stretch four times as far as the freeway is from the Project. HELP and CCLA do not imply that all the cars will be on Sunset headed towards the Hollywood Freeway at the same time, but one can better grasp the number of cars which this Project will add to Hollywood's traffic congestion by relating the number of cars to something with which Hollywoodians are already familiar.

The worse freeway on-ramp off ramp configuration is three north of this Project at the intersection of Argyle, Franklin, and Vine and the Hollywood Freeway. This tangle of streets and freeway ramps is already over

burdened.

One has to consider the cumulative impact from the added cars from the Crossroad's Project at 6665 Sunset. That project will add another two linear miles of cars and an additional 11 linear miles of homes within a few block of this Project. The cumulative increase in population density and number of additional cars are far more than Hollywood's infrastructure can handle.

False claims are made that residents will not use cars they live in a Transit Oriented District [TOD]. This claim is false. People who live in TODs own cars and they use cars. The only segment of society which tends not to own cars and rely on mass transit are the very poor. Unless the Project will house only extremely poor people, there be no expectation that the residents will use the subway.

7. Only Poverty reduces Vehicle Ownership

The idea that creating TODs will force people to use mass transit, e.g. the subway, is false. Except for the poor, very elderly, and blind, TODs residents own cars and add to the traffic congestion. The commercial space cannot be finally viable unless it can attract cars. When she was Controller, Laura Chick conducted a study which showed that one-half of all commercial space in the CRA/LA's mixed-use projects was vacant.

The major cause of the failure of the mixed-use commercial space was the lack of parking. Nonetheless, developers and the City persist in their mythical thinking that people will use the mass transit and thus there is no need for parking. Developers like the idea of not paying to construct off street parking, ignoring the fact that lack of parking make their projects long term economic failures.

The only known way to reduce the number of cars per household in Los Angeles is to drastically reduce the income level. [*The Relation Between Transit Availability and Automobile Ownership: the Case of Los Angeles* County, University of New Orleans, School of Urban and Public Affairs, by Devajyoti Deka, 1-1-1999] While the rate of car ownership in Hollywood before the advent of its subway and its associated mixed-use projects by the Community Redevelopment Agency [CRA/LA] was lower in the transit areas, that relationship was broken by 2010. (See also <http://1.usa.gov/1j4dNmP>

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FHWA NHTS BRIEF 2014, Mobility Challenges for Households in Poverty.
Poverty correlates with lack of car ownership.)²

Adding subways can actually result in a higher incident of car ownership per household. After the Hollywood Subway was completed, vehicle ownership per car in Hollywood's CD 13 jumped by 30%.

One reasonable explanation for the increase in car ownership per household is that a lot of single Millennials started rooming together in the apartment complex in the TODs. Despite the claim that Millennials only use bicycle and subways, the reality is different. While a family is likely to own one car, a Millennial "household of 2 or 3 unattached persons" can have 2 or 3 cars. Unmarried Millennials without children have a higher disposable income than people with the same income but who also have children. Thus, poverty appears to be the main variable in car ownership.

In fact, non-owning a car creates a vicious cycle which keeps people below the poverty line. <http://urbn.is/20Vgyc3> March 2014, URBAN INSTITUTE, *Driving to Opportunity: Understanding the Links among Transportation Access, Residential Outcomes, and Economic Opportunity for Housing Voucher Recipients*.

In fact, relying on mass transit harms the poor. <http://bit.ly/1NykAgs> August 22, 2013, NewGeography, *Mobility for the Poor: Car-Sharing, Car Loans, and the Limits of Public Transit*, by Joel Kotkin. The idea that mass transit is an acceptable mode of transportation in a large, circular geographic area is false. Whenever people can afford to use a car, they shun mass transit. When the area becomes too congested, a considerable number of people move away to less dense parts of the state or to other states. The idea that the City

²

Because the poor cannot afford cars and the cost of insurance, they tend to use mass transit, but mass transit imposes hidden costs on the poor. Because mass transit is slow and usually requires that the rider walk to the bus or subway stop, the time required to take the bus or subway is considerably longer than driving a car. Because time is money, the poor pay a significant unseen cost by using mass transit. The more congested a Project makes the surface streets, the slower the buses will travel and thus indirectly, the projects for the wealthy cost the poor people more money just to go about their every day lives.

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can force people to use mass transit projects like This Project has been rebutted by all the evidence.

The idea that living close to a subway or a bus will compel wealthy people to use mass transit is false. As has already been seen in the CD 13 portion of Hollywood, where this Project will be located, when the area becomes too dense, people can afford to leave, move elsewhere. <http://bit.ly/XjXmGk> January 3, 2013, LA Weekly, *Hollywood's Urban Cleansing 12,878 Mostly Latinos Are Pushed Out by City Hall, High Rents and Hipsters*, by Patrick Range McDonald.

HELP brought this fact to the City's attention in 2005 in its response to the Notice of Preparation for the Hollywood Community Plan Update. HEP explained that by increasing population density, traffic density would increase and that by not providing adequate off-street parking in the CRA projects, more cars would be competing for the on-street spaces. The result would be Default Tenants, i.e. people who cannot afford to live somewhere better.

This Project is so outlandishly large for one-half square block of Hollywood that it will create its own min-culture of traffic gridlock, lower socio-economic status, and increased crime rate as Hollywood has experienced when other TODs have been constructed.

(B) The Crossroad Project Is Similarly Disastrous for Hollywood

HELP and CCLA submitted extensive comments on this Project on November 23, 2015 and those comments also critiqued many of the problems which re-appear in the HCP2. Thus, all commenters adopt and incorporate by reference herein all the comments and all the attachments to the November 23, 2015 comments on The Crossroads project, as edited on May 23, 2016.

3. The Need to Study Virtual Presence as A Form of Transportation

Not only Hollywood, but the world stands at the threshold of a new era, and like prior thresholds, almost no one knows what awaits them. It has two common names. The most famous is Cisco's Telepresence © and Virtual Presence. People already see it almost daily. Years ago, cable viewers saw it on The Rachel Maddow

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Show as she used it to conduct many of her interviews prominently displaying the Cisco Telepresence © identification. More recently, millions of people know it as Jimmy Kimmels' Wall on America.

What people do no realize that Cisco's Telepresence © and Virtual Presence is ready for home usage and that when it breaks upon the scene, the changes will be similar as transitioning from cell phones to smart phones. At first it will seem interesting, but will soon be a major force dramatically altering not only communications but also transportation and housing. The world before Virtual Presence and after Virtual Presence will look dramatically different.

For the same reasons that Mobility Plan 2035 was under an affirmative duty to study Virtual Presence, HCP2 has the same affirmative duty. The commenters hereby incorporate by reference herein *Hollywoodians Encouraging Logical Planning [HELP] and Citizens Coalition Los Angeles [CCLA] Comment on Mobility Plan 2035 for Failure to Study CEQA Alternative of Virtual Presence as Part of Future Transportation Infrastructure – Los Angeles City Council File # 15-0719* which is resubmitted herewith.

This submission is without prejudices to the commenters' claims that the NOP if deficient on its face and needs to be rewritten and reissued

Very truly yours,

Richard MacNaughton

Richard MacNaughton

RSM:ra

electronically signed

submitted with 11-23-2015 Comments on The Crossroads

Hollywoodians Encouraging Logical Planning H.E.L.P.

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Monday, November 23, 2015

edited May 23, 2016

Mr. Alejandro Huerta via email: alejandro.huerta@laCity.org
Environmental Analysis Section
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: Case No. ENV-2015-2026-EIR
Project Name: Crossroads Hollywood
Applicant: CRE-HAR Crossroads SPV, LLC
Main Location: 6665 Sunset Boulevard, Hollywood, CA 90028
Com Plan Area: Hollywood
Council District: 13
Due Date: November 23, 2015

Dear Mr. Huerta:

This letter and its enclosures are Hollywoodians Encouraging Logical Plan's [HELP] and Citizens Coalition Los Angeles' [CCLA] initial comments on the October 2015 Initial Study for the above-captioned project [The Project].

Mr. Alejandro Huerta
Re: Crossroads Hollywood
Monday, November 23, 2015 (edited May 23, 2016)

1. Preface

It is difficult people to cull out the various principles at work in City planning. If one excluded all the deliberate misinformation, one would still have trouble discerning what factors influence the planning for any particular project. One of the biggest challenges derives from the phenomenon that feedback can stop a trend. People have the tendency to make straight line projections while ignoring the fact that almost all trends contain the seed of their own reversal. People do not continue to grow taller until their 90th birthday. If I accelerate my car with the pedal to the metal, it will not reach 500 mph.

Too many people made the mistake of thinking that because Hollywood had significant population growth in the 1970's and 1980's, that the population surge continues. While people know that whatever goes up has to come down, they have trouble applying that concept to population trends.

The reality for Hollywood is that starting around 1990, Hollywood began to lose population. It was in 1993 that Mayor Riordan made the mistake to bring the Community Redevelopment Agency [CRA/LA] to Hollywood to construct housing for the hordes of people who were allegedly coming. By 1993, however, Hollywood's population increase was becoming a population decline. The US Census data showed between 1990 and 2000, the population dropped from 213,912 people to 210,824.

Ignoring the fact that the population was declining, Councilman Garcetti, who took office in 2001, roared ahead with more CRA/LA mixed use projects. By 2010, Hollywood's population had dropped to only 199,228 people. When one delves into the population statistics, one discovers that the CRA/LA construction was a significant factor causing the exodus.

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Re: Crossroads Hollywood
Monday, November 23, 2015 (edited May 23, 2016)

An analysis of Hollywood census tracts showed that the greatest decline occurred in the census tracts contiguous to the subway stations and the mixed-use projects. Garcetti's mixed-use projects had made his CD 13 portion of Hollywood so undesirable that his council district ceased to have enough people to constitute a legal council district. People were leaving only one particular part of Hollywood, i.e. the census tracts where the subway and mixed use projects were being constructed. The parts of Hollywood away from CD13 gained population. The analysis showed that the harm done to Hollywood in CD 13 was so great that it swamped the improvements in Council District 4, which had no CRA/LA project. When Judge Goodman saw the US census data, he rejected Garcetti's Update to the Hollywood Community Plan, ruling that it was based on fatally flawed data and wishful thinking. The same is true for the Crossroads Project. [*Judge Goodman's January 15, 2014 Statement of Decision* is submitted herewith]

The City planners and the developers did not want to admit the subway and the CRA/LA projects caused decline, and to this day, they refuse to admit that people dislike density and they dislike mass transit. HELP's and CCLA's comments attempt to introduce some accurate information into the planning process.

2. What's Wrong With Planning in the City of Los Angeles:

This mega-project showcases what is wrong with planning in the Hollywood. In rejecting the Hollywood Community Plan Update, Judge Allan Goodman explained the basic flaws, i.e. The City uses fatally flawed data and wishful thinking to such a great extent it subverts the law. Judge Fruin and Judge Chalfant found a related problem with the City's planning, i.e. intentional violations of the law. Judge Fruin rejected the Target Store at the corner of Sunset and Western in Hollywood, because the City had deliberately violated

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the Specific Plan, called SNAP. Judge Chalfant rejected the Millennium Towers just north of the Pantages Theater because the City ignored the law to follow the directions of CalTrans as the “responsible agency” on traffic studies.

The intentional use of false data combined with intentional breaking of the law is bringing a crisis upon the City of Los Angeles in general and upon Hollywood in particular. One group, SaveValleyVillage, has sued the City over its unlawful vote trading system which has been used to implement detrimental projects [*SaveValleyVillage v City of Los Angeles*, Case # BS 157989], and another group of citizens, Coalition to Preserve L.A., is promoting a ballot measure to create a moratorium on these fatally flawed projects.

The Crossroads Project incorporates everything that is wrong and unlawful with the City’s planning process. All the City councilmembers need to realize that theory of Smart Planning with its Transit Oriented Planning is based on false data and that for two decades, the evidence of the harm which Smart Planning does to a City like Los Angeles has been accumulating. In fact, the harm which Smart Planning does to any large circular urban area was known 100 years ago. On page 38 of the 1915 *Study of Street Traffic Conditions in the City of Los Angeles*, our own civil engineers warned that TODs would only make a few landowners very wealthy while harming everyone else.

Such a policy [TODs] would be nothing less than a deliberate exploitation of civic resources for the benefit of the limited number of property owners enjoying abnormal incomes from rental privileges. *Study of Street Traffic Conditions in the City of Los Angeles*, 1915, Bureau of Engineering, page 38

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3. Propaganda Underlies All the Major Projects in Hollywood:

Because the Smart Planning ideology on which all the major projects in Hollywood are based is false, the City's Environmental Impact Reports [EIRs] for each project are not studies of the real impacts which the project will have upon Hollywood and its residents, but rather they are propaganda pieces whose purpose is to sell the project to the public by hyping non-existent benefits and concealing known harms.

4. The Health Benefit Trick:

One trick, which the City used in its Mobility Plan 2035, is to claim that TODs and the transportation plans to support them have significant health benefits. They "prove" this benefit by asserting that when people live in TODs there are fewer cars and overall that means less auto emissions. Thus, we are lead to believe hat TODs such as the Crossroads make the City more healthy.

The reality is different. As will be shown, TODs attract more cars and auto ownership increases in TODs. In addition, TODs create additional traffic congestion and by making traffic move more slowly, cars emit more toxic fumes. Thus, the toxiCity of the main streets near TODs poses more health risks than before the TOD was constructed.

5. Transportation and Population Density:

Land Use requires a coordination of Transportation and Population Density. No place can make realistic plans for its future unless it has a scientific understanding of the transportation infrastructure which the proposed development will require. For Los Angeles, the landmark document for Los Angeles's transportation is the 1915 *Study of Street Traffic Conditions in the City of Los Angeles*, a copy which is submitted herewith.

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The mathematics of transportation, Los Angeles' topography, and the finances of transportation have not changed over the prior century. In fact, each time the principles set forth in the 1915 Traffic Study are broken, Los Angeles suffers. Mathematics does not change from year to year and the relationship between transportation and Los Angeles's topography is based on math.

a. Subways Cannot Function as Mass Transit:

At the outset one needs to distinguish between **inter**-urban trains and **intra**-urban fixed-rail such as subways and trolleys. Sometimes, these concepts are confused. Is Metrolink inter-urban or intra-urban? For purposes of planning for the City of Los Angeles, HELP and CCLA include the entire Basin with all the cities along the "Shoe String" which extends down to San Pedro as well as the beach cities north of Orange County, plus all of the San Fernando Valley and the western parts of the San Gabriel Valley. We exclude Glendale, Pasadena, and those areas. Before any intra-urban fixed rail system can dispense with car ownership, it has to cover these basic areas of the urban Los Angeles.

The 1915 Traffic study shows the mathematical reason that fixed-rail systems whether they are subways or above-ground trolleys cannot provide a mass transit system for Los Angeles. Once we grasp this fact, we can realize that TOD resident cannot give up car ownership in favor of mass transit (subways, fixed-rail and buses).

The first thing people need to realize is that all transportation is held prisoner to an area's topography. Manhattan is only 2.5 miles wide and 11 miles long. As a narrow rectangle, tracks which start at one end and extend to the other end of the narrow island do not diverge. Thus, it is easy to construct a subway system where everyone on the island lives and works within $\frac{1}{2}$ mile of a subway station. The 1915 Study of Street Traffic Conditions found that people will not use a subway if they have to walk more than $\frac{1}{2}$ mile to or from the station. Metro uses the same measurement in 2015.

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The area which subway has to serve in Los Angeles is a huge circular area, sometimes called a radiant City. The City's boundaries do not set the parameters of a subway system. As we said, West Hollywood, Beverly Hills, Inglewood, and a host of small towns between DTLA and San Pedro have to be part of any subway system.

The mathematics of a subway (and for an above ground rail system) make a fixed-rail system non-functional once the urban area has a radius greater than 5 miles. Each reader can confirm this fact for him/herself by drawing 5 concentric rings where each ring is one mile from the rings on either side. One sees that it is mathematically impossible to design fixed-rail system which will have a station within $\frac{1}{2}$ mile of each resident. In other words, a fixed-rail system fails to be an urban transportation system before it extends to Hollywood.

Since the system breaks down at a radius of 5 miles from DTLA, one should realize that no fixed-rail system can function when the distance from DTLA to the ocean is about 15 miles. The outer ring of a fixed rail system with a radius of 15 miles would require 90 stations just on that ring alone. The number of subway stations and their cost is not the real problem. We need to face the fact that no fixed-rail system can serve an huge circular geographic area.

The mathematically reality is that a fixed-rail system cannot serve a huge circular urban area. It does not matter whether one lives on top of a subway station, the system will never come close to covering all the locations that people need to go on a daily basis. Once people grasp that it is mathematically impossible to have a fixed-rail system serve as our mode of transportation, then we can stop with the foolish claim that TODs reduce people's need to have cars.

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For this reason, subways do not remove the need to have a car if one is to function in Los Angeles. There is no rational reason to create Transit Oriented Districts since they create areas of extra population density with many more vehicles per square mile. As a result, if a TOD were actually occupied at 100%, it would create gridlock within its area.

As we have seen, other forces come into play before gridlock is reached.

b. *The City Cannot Force People to Live in TODs:*

The 1915 Study of Street Traffic Conditions shows that cities where the topography forces the population to live within narrow confines, such as Manhattan, can profitably maintain a fixed-rail system. Cities, such as Los Angeles, which have no topographical barriers cannot support fixe-rail systems because the geography does not compel them to live in such dense proximity to each other.¹

In what may be called an unfortunate synthesis of hubris and myopia, recent Los Angeles politicians and real estate developer were seized with the notion that they can artificially create a Manhattan in portions of Los Angeles.

¹

The other significant factor is that Eastern cities like Boston, Baltimore, and Philadelphia began in the pre-motorized age when walking was the mode of transportation. Thus, narrow lots with high population density were favored, but Los Angeles began after the motorized age. At the end of the 1800's and early 1900's, trolleys served the small Los Angeles. By 1915, however, it was clear that the combination of the lack of topographical barrier and the motorization of transportation meant that Los Angeles would become a huge, radiant city of primarily single-family homes. In other words, L.A. was growing in a manner which fixed-rail transit would not be a feasible mode of transportation.

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They believed that by constructing extremely dense TODs, they could fashion with own idea of Manhattan running along Sunset and Hollywood Boulevard through Hollywood.

Since the extreme density of Manhattan made the subway and the skyscrapers financially viable, the Manhattanization of Sunset and Hollywood would bring similar benefits. They are wrong!

c. *The Folly of Manhattanization:*

Manhattanization requires more than building mega-dense mixed-use projects in Hollywood. As noted above, Manhattan is a narrow island 2.5 miles with Central Park running much of its length and with water on both sides. Thus, it is financially feasible to construct a subway system where everyone lives within $\frac{1}{2}$ mile of the subway.

Since Hollywood has only one subway running beneath Hollywood Boulevard, it serves the area between Franklin Avenue on the north and Santa Monica on the south, both of which are .6 mile from Hollywood Boulevard.²

In order to understand the folly of trying to Manhattanize Hollywood to make subway functional, one needs to look at what exists to its north and south. Manhattan is bounded by water – no one lives in the East River, but people do live in the Hollywood Hills, they do live in Hancock Park. Hollywood is not an island. The people who live in Hollywood want to go places and need to go

²

May 23, 2016 correction. Measuring along Western Avenue using Google maps, it is .8 mile from Hollywood Boulevard to Santa Monica Boulevard in Hollywood and it is .3 miles from Hollywood Boulevard to Franklin measuring along Western Avenue and .4 miles to Los Feliz Boulevard. Above Franklin Avenue, over 90% of the housing is single family.

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places that are 2 miles south of the boulevard. Wilshire is almost 3 miles south of Hollywood Boulevard.

The topography of NYC makes the subway lines which feed into Manhattan function like inter-urban subways. All the boroughs are physically separated from Manhattan. Manhattan is not in the middle of a huge, contiguous urban sprawl covering thousands of square miles. It is a extraordinarily narrow island. People come to Manhattan daily to work, while their lives remain miles away from the island. Thus an inter-urban fixed-rail system can function for people to commute to and from work.

That is another crucial aspect of Manhattan – people flow into Manhattan on a daily basis solely to work. Thus, a subways system which is designed to convey workers to and from Manhattan is financially feasible.

The reality is that people who live in Manhattan have no need to go to Queens on a daily basis and people from the Bronx do not go into Manhattan on a regular basis. If one lives in Hollywood, however, one goes to the San Fernando Valley all the time; Hollywoodians routinely go to West Hollywood, to Beverly Hills, to DTLA, to Inglewood, to East Los Angeles.

One does not replicate the topography of Manhattan by densifying Hollywood and Sunset Boulevards by lining them with skyscrapers. Because Manhattan is both so narrow, the places people need to go are within walking distance as augmented by subways on the west side and the east side. That situation is not replicable in Hollywood.

The attempted Manhattanization of Sunset and Hollywood Boulevard is an absurd folly because literally confuses a circle with a 15 mile radius with a two and one half mile wide rectangle.

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d. Hollywood Proves that Manhattanization of Foolish:

The demographic studies and the actual experience with council district 13 in Hollywood show that the City cannot force people to live in TODs. Because people dislike being crowded, traffic congestion and inadequate parking are the primary complaints of Angelenos. Those who can afford to do so, move away. That leaves the TODs with Default Tenants, i.e. people who are too poor to move to more desirable places.

No matter how many skyscrapers are constructed along Sunset and Hollywood Boulevard, its residents do not live on an island and they will need cars in order to live in Los Angeles. That means no TOD in Hollywood will eliminate the need of its residents to own and drive cars. Each TOD will attract thousands of additional vehicles and those cars will make traffic congestion near the TODs unbearable.

The City, however, will not admit that people are leaving the TODs. During the Hollywood Community Plan litigation, Garcetti insisted that the City pretend that Hollywood's population had increased from 210,892 people in 2000 to 224,452 in 2005. In reality, the population had decreased to about 206,000 in 2005. The reason for the false claim of Hollywood's rapidly increasing population was to justify the construction of more mixed-use projects. Similar false data is being used to justify the Crossroads' adding 870 additional housing units.

As we have shown, while the City was falsely representing that the subway and the CRA/LA projects were huge successes, they were an abysmal failure, driving so many people away from Hollywood that CD 13 ceased to qualify as a legal council district.

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e. *In Pursuit of its Manhattanization of Hollywood,
The City has Done Significant Harm:*

The City has the unfortunate habit of falsely stating that Hollywood has been revitalized. If by revitalized, one means a form of ethnic cleansing in order to make room for single Millennials, then there is some truth to the revitalization claim. <http://bit.ly/XjXmGk> 2013-1-3, LA Weekly, *Hollywood's Urban Cleansing 12,878 Mostly Latinos Are Pushed Out by City Hall, High Rents and Hipsters*, by Patrick Range McDonald. The apparent theory behind the misrepresentations behind Hollywood's revitalization and its dramatically increasing population is to hasten gentrification.

In addition, the CRA/LA siphoned off billions of tax dollars which were used to subsidize the unwanted mixed-use projects in Hollywood. As a result, the City could not afford basic infrastructure. By diverting literally billions of dollars to developers to construct financial fiascos like Hollywood-Highland, The Metro Apartments, the Sunset-Gordon Project, LA lacked the funds to provide paramedics. In fact, the City took money away from paramedics so as to have enough money to give subsidies to real estate developers.

Los Angeles knew for a decade that the sidewalks had deteriorated so badly that they were not ADA-compliant and that the City would be sued. Rather than repair sidewalks, Los Angeles gave more money to the TOD developers. Just this year [summer 2015], the City lost a \$1.3 BILLION lawsuit and had to pay \$15 Million in attorney fees due to its ADA non-compliant sidewalks.

f. *The Myth that The Millennials will Make the TODs Profitable:*

Leaving aside all the social debate about gentrification, the reality is that there are not enough new people to occupy these highly **undesirable** units. The

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Millennials are already transitioning into the family rearing generation and all the demographic studies confirm that older Millennials do not like TODs for raising families. In fact, LA itself is too crowded for them and they move to different states like North Carolina and Texas so they can have a single family home with a large yard. November 3, 2015, FORBES, *So Much For The Death Of Sprawl: America's Exurbs Are Booming*, by Joel Kotkin

The idea that Millennials will move into The Crossroads approaches the delusional.

Gen Yers might be young and idealistic, but they're not stupid. The closer they get to marriage and having children, the more they'll begin thinking about these things, just as previous generations did. Surely, some of them, likely the best paid (who can afford private schools), will stick around urban areas. But that's always been true, even during the 1970s and 1980s, when cities were rather dirty, dangerous places. April 1, 2015, *Why Older Millennials Are Leaving the Urban Core and Younger Millennials Aren't Far Behind* by Ryan Servino.

Who will be willing to live in the Crossroads projects? No one has addressed this issue. With the project at 8150 Sunset , the Millennium Towers and the Palladium and in-fill projects, there are not enough people coming to Hollywood to live in these projects. Even assuming that the mixed-use apartments in the last few years have attracted some Millennials who are doubling up to pay the rents for the new places along La Brea, the claim that there has been a shift in long-term pro-urban housing among the Millennials is myth. Rather, they are fleeing place exactly like the Manhattanization of Hollywood of which The Crossroads is a significant part. July 23, 2015, Stateline, *Millennials: Living on the Edge of the Big City*, by Tim Henderson

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Another significant factors which deter Millennials from moving into the more dense urban projects are (1) bad schools and (2) bad infrastructure. The Los Angeles Unified School District is tied with Oakland as worst in California and California is near the bottom of the 50 states and the United States ranks near the bottom of industrialized nations. Like other parents, Millennials do want good schools and decent infrastructure and Los Angeles has neither. July 16, 2015, Urbanism, *Millennials Will Live In Cities Unlike Anything We've Ever Seen Before* by Alissa Walker

People who are wealthy enough to afford private schools will not be moving into the crammed Crossroads Complexes in the center of one of the City's highest crime areas.

6. The Crossroads Project Has to Greatly Increase Traffic Congestion or Be an Economic Failure

Because the claim that residents of the Crossroads will use the subway is false, the Project cannot be a financial success until it attracts people and their cars. As discussed below, the only significant factor which correlates with not owning a car is poverty. Even then, many poor people own cars. The people who can afford to live at Crossroads are people who will own cars.

7. The Project Will Add 11 Linear Miles of Additional Living Units to on Square Block in Hollywood:

This project will be adding a huge population increase to roughly one square block of Hollywood.³

³

The project is between Sunset and Selma and Highland and $\frac{1}{2}$ block passed Las

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Because it is difficult to visualize the increased population density of high rises which are 30 stories high, HELP & CCLA use the concept of Linear Miles. Linear miles take the total number of additional living units and multiples them by 60 feet, which is the average width of a R-1 lot. Then we divide that number by 5,280 which is the number of feet in a mile.

Thus, Linear Miles tells us how far all these new condos and apartments would stretch if they were modest single family homes sitting side by side.

This Project proposes to add the equivalent of over 11 Linear Miles of new homes within one square block.

8. How Long is 11 Linear Miles?

Just as it is helpful to translate, number of housing units into Linear Miles, one can more easily understand how much additional population density is being added by comparing the 11 Linear Miles to commonly known places in Los Angeles. For example, it is only 7 miles from the project at 6665 Sunset to City Hall at 200 S. Spring street. That means that if one drove, walked, or rode a bike from the Project to City Hall, he/she would have a house next to him/her the entire trip. By the time, they reached City Hall, they would still have 4 more miles of homes before they reached 11 Linear Miles.

If one went westward, 11 Linear Miles would take one through Beverly Hills past Jan and Dean's "Dead Man's Curve," past UCLA and to the intersection of Sunset and the 405 Freeway.

Palmas, but since it omits a large section of Sunset between Highland and ½ block passed McCadden, the effective area is one square block

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When we take the time to visualize these distances, we can better comprehend the additional density which The Project will bring to one square block.

9. What will be the Impact of 11 Linear Miles of Additional Population in one Square Block?

People tend to look at the pretty pictures of the buildings and listen to the platitudes which accompany them. When one is concerned about the impact this population increase will have upon Hollywood, we have to take some time to get an understanding of how all these additional people will affect lives of Hollywoodians.

10. The Increase in Automobiles Will be More Than Hollywood Can Handle

The claim that people who live in these Transit Oriented Districts will use the subway has been proven to be false. Almost every family who can afford a car who lives in a TOD will have a car. The subway cannot substitute for a car because the subway covers only 5% to 10% of the City.⁴

As the Metro's own data shows, when "illegals" were recently permitted to obtain drivers' licenses, subway ridership significantly declined.

⁴

The 1915 *Study of Street Traffic Conditions in the City of Los Angeles* conducted by the City's Bureau of Engineering has been submitted to the City many times in the last decade. Nonetheless, the City persists in ignoring this landmark study and excludes it from the materials for the public record. Thus, once again HELP & CCLA have added the 1915 *Study* to the public record for this Project.

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11. Vehicle Ownership Does Not Decrease for People Who Live in Transit Oriented Districts

The rate of car ownership per household does not decrease for people who live in Transit Oriented Districts. Poverty correlates to lack of ownership. When one adjusts for more poor people living near transit hubs, one's wealth determines whether they are likely to own a car. This correlation was established for Los Angeles County back in 1999, but the City refuses to share this data, but instead it sets forth the false claim that people who live in Transit Oriented Districts will not own cars and they will use the subway and bus. A similarly false claim is made for this Project. [*The Relation Between Transit Availability and Automobile Ownership: the Case of Los Angeles County*, University of New Orleans, School of Urban and Public Affairs, by Devajyoti Deka, 1-1-1999]

12. How to Calculate the Number of Additional Vehicles in Hollywood from This One Project

The Project proposes to remove 80 Affordable Housing units and replace those 80 units with new affordable housing. That means the incident of car ownership for those 80 units should remain constant. As the rest of the 950 units will be for wealthier people, we can use the average number of cars per person. For Los Angeles that is .54 vehicles per person. [December 30, 2010, Streetblog, *Density, Car Ownership, and What It Means for the Future of Los Angeles*, by Damien Newton.] In other words, one car for every two people.

If we assume that there will be an average of two people per unit in the Project, that means a minimum of 870 additional cars in a one square block area. The average car is about 15 feet long. 870 cars x 15 feet equals 13,050 feet or about 2.5 miles of cars stretched end to end. That line of cars is twice as long as the distance from the Project to the freeway entrance at Sunset and Van Ness.

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In order for anyone at 6665 Sunset to reach the Hollywood Freeway during rush hour traffic, they will have to pass the large Palladium Towers at Sunset and Argyle and the tower proposed for the north-east corner of Argyle and Selma, not mention the additional housing units planned for the portion of Boulevard 6200 south of Hollywood Boulevard.

HELP & CCLA do not suggest that every car from The Project will be trudging along Sunset Boulevard to the freeway on-ramps. Again, it is helpful to grasp the potential burden on the streets to translate the number of additional cars into scenarios with which we are familiar.

13. Only Poverty Reduces Vehicle Ownership

The only known way to reduce the number of cars per household in Los Angeles is to drastically reduce the income level. [*The Relation Between Transit Availability and Automobile Ownership: the Case of Los Angeles County*, University of New Orleans, School of Urban and Public Affairs, by Devajyoti Deka, 1-1-1999] While the rate of car ownership in Hollywood before the advent of its subway and its associated mixed-use projects by the Community Redevelopment Agency [CRA/LA] was lower in the transit areas, that relationship was broken by 2010. (See also <http://1.usa.gov/1j4dNmP> *FHWA NHTS BRIEF 2014, Mobility Challenges for Households in Poverty*. Poverty correlates with lack of car ownership.)⁵

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Because the poor cannot afford cars and the cost of insurance, they tend to use mass transit, but mass transit imposes hidden costs on the poor. Because mass transit is slow and usually requires that the rider walk to the bus or subway stop, the time required to take the bus or subway is considerably longer than driving a car. Because time is money, the poor pay a significant unseen cost by using mass transit. The more congested a Project makes the surface streets, the slower the buses will travel and

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Adding subways actually results in a higher incident of car ownership per household. After the Hollywood Subway was completed, vehicle ownership per car in Hollywood's CD 13 jumped by 30%.

One reasonable explanation for the increase in car ownership per household is that a lot of single Millennials started rooming together in the mixed-use apartment complexes in the TODs. Despite the claim that Millennials only use bicycle and subways, the reality is different. While a family is likely to own one car, a Millennial "household of 2 or 3 unattached persons" can have 2 or 3 cars. Unmarried Millennials without children have a higher disposable income than people with the same income but who also have children. Thus, poverty appears to be the main variable favoring car ownership.

In fact, not owning a car creates a vicious cycle which keeps people below the poverty line. <http://urbn.is/20Vgyc3> March 2014, Urban Institute, *Driving to Opportunity: Understanding the Links among Transportation Access, Residential Outcomes, and Economic Opportunity for Housing Voucher Recipients*. To the extent social planners are interested in reducing poverty, they need to increase car ownership among the poor. It has been proven, adding fixed-rail transit in poor areas does not result in enhanced job opportunities for the poor since the overwhelming majority of decent jobs are not reachable via fixed-rail transit.

In fact, relying on mass transit harms the poor. <http://bit.ly/1NykAgs> August 22, 2013, NewGeography, *Mobility for the Poor: Car-Sharing, Car Loans, and the Limits of Public Transit*, by Joel Kotkin. The idea that mass transit is an acceptable mode of transportation in a large geographic area is false.

thus indirectly, the projects for the wealthy cost the poor people more money just to go about their every day lives.

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Whenever people can afford to use a car, they shun mass transit. When the area becomes too congested, a considerable number of people move away to less dense parts of the state or to other states. The idea that the City can force people to use mass transit projects like the Crossroads Project [and other TODs] has been rebutted by all the evidence.

The idea that living close to a subway or a bus will compel middle class people to use mass transit is false. As has already been seen in the CD 13 portion of Hollywood, where this Project will be located, when the area becomes too dense, people who can afford to leave. <http://bit.ly/XjXmGk> January 3, 2013, LA Weekly, *Hollywood's Urban Cleansing 12,878 Mostly Latinos Are Pushed Out by City Hall, High Rents and Hipsters*, by Patrick Range McDonald.

HELP brought this fact to the City's attention in 2005 in its response to the Notice of Preparation for the Hollywood Community Plan Update. HELP explained that by increasing population density, traffic density would increase and that by not providing adequate off-street parking in the CRA projects, more cars would be competing for the on-street spaces. The result would be Default Tenants, i.e. people who cannot afford to live somewhere better. People do not like to search for 5 to 10 minutes to find a place to park and end up having to walk 3 blocks to their homes. The City could have constructed additional off-street parking in order to make life easier in these places, but Councilman Garcetti wanted to force people to give-up their cars and use the subway. Instead, people gave up on Hollywood and moved away.

This Project is so outlandishly large that it will create its own mini-dead zone of traffic gridlock, lower socio-economic status, and it will increase crime rate as Hollywood has experienced when other TODs have been constructed.

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Highland Avenue is already congested far beyond acceptable, especially during evening rush hour. The problem becomes much worse due to the frequent closings of Hollywood Boulevard for premiers, The Jimmy Kimmel Show, The Oscars, and other events. Each time Hollywood Boulevard closes, the east-west traffic tries to move down to Sunset Boulevard. As residents know, Sunset Boulevard is already slower than Hollywood Boulevard.

As was pointed out above, traffic and population density are simple math questions. It is easy to calculate that fixed-rail cannot serve Hollywood, it is also easy to figure that a significant addition of cars will push Hollywood beyond its Saturation Point.

The City will never tell anyone about the Saturation Point for traffic congestion. The City, however, is under an affirmative duty from CEQA to calculate the Saturation Point. Among other reasons, when an area reaches the Saturation Point, cars do not move, but they emit fumes.

14. The Impact of Office and Commercial Space:

The Project proposes 1,432,000 sq feet of space with 95,000 square feet of office space and 185,000 square feet for commercial use with 950 housing units and 2,500 parking spaces. If the Project follows the lead of the Metro Building at Hollywood and Western and lacks adequate parking for offices and commercial use, the financial viability of the entire project is questionable. After a decade, the Metro Building leases out about 1/4 of its space and that is to a US Bank training branch.

15. LOS for Nearby S Intersections

Because measuring the Level of Service [LOS] at intersections showed the

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additional traffic congestion which TODs bring to an urban area, California solved that problem by not using LOS any more. Everyone can see that the intersections along Highland from Santa Monica to the 170 Freeway operate at a Level F – the worst. Now, the State wants to use VMT for Vehicle Miles Traveled. That is a measure designed for fraud.

Rather than use a measurement which can be mathematically verified, e.g. how long it takes a car to clear an intersection, we now will have a mythical number. If there is a grocery store in the mixed-use project, they will assume that people will shop there and hence claim that fewer vehicle miles are being driven. Meanwhile, they will ignore intersections which require three changes of the signal in order for a car to clear the intersection. By assuming that people who live in TODs do not use cars, they will stop measuring how many cars are actually on the road. In other words, the TOD advocates have decided that when the data approves that their theory makes life worse, they stop collecting data.

The reality will not change. A project which is a financial disaster as it can fill only 30% of its living units and 25% of its commercial space can still make the surrounding streets into gridlock hell. What happens is that people have a certain level of toleration of traffic congestion. When living in an area becomes more effort than it is worth, people move away. When the parking is so restricted or the streets are too crowded, people do not shop at the stores. The same forces, which leave the Metro Apartments with only 1/4 of its retail in use and made Hollywood Highland the largest real estate write down in history, will befall this Project.

Hollywood Highland has made traffic in this portion of Hollywood a nightmare. It can take 10 minutes to drive from La Brea to Highland Ave along Franklin Avenue during rush hour. [April 2016 the time increased to 27 minutes.] This Project is a block from the Hollywood-Highland fiasco.

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16. An Inaccessible Project is a Failure

A Project which is essentially inaccessible is a failure – like Hollywood-Highland and like Metro Building. As explained above, this type of construction makes neighborhoods so undesirable that CD 13 lost so many people between 2000 and 2010, CD 13 ceased to qualify as a legal council district.

The above density and traffic analysis explains some of the main factors which excessive population density has brought and will bring to Hollywood.

17. The Initial Study is Repeating the Same Mistake Which The City Made with The Millennium Project

From reading the Initial Study, one sees that the City is repeating the mistake it made with The Millennium Project, i.e. to substitute its own ideas on traffic impacts for the mandates of CalTrans. On Page B-29, the City proposes to use CMP. As Judge Chalfant wrote in his decision rejecting The Millennium Project.

In response to Caltrans, the City relied on the traffic analysis required by the CMP, which is the standard methodology for traffic studies in the County, and analyzed key freeway ramps as well as freeway mainline segments, finding a less than significant traffic impact. A supplemental traffic study using SCAG methodologies confirmed this conclusion. The City did not expect the ramps listed by Caltrans to be a capaCity restraint issue. The City contended that Caltrans' allegation about its low trip estimates was unwarranted as the estimates were based on well accepted guidelines. Finally, the City preferred its congestion modeling to. Caltrans' HCM metho-dology which is inapplicable to planning issues. *Judge Chalfant Millennium Decision*, page 20

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Judge Chalfant rejected the Millennium EIR due to the City's refusal to listen to the directives of CalTrans, which was the Responsible Agency for this area of study. Judge Chalfant wrote:

The City's choice of methodology did not comply with the substance of what Caltrans required, and the City was not free to ignore it. Even the CMP expressly states that Caltrans must be consulted to identify specific locations on the freeway system for analysis. AR 11863. The City relied on the CMP for thresholds of significance, but Caltrans told the City that the congested conditions of the 101 Freeway meant that even trips below the arbitrary CMP threshold of 150 could be significant and should be analyzed using its TISG. AR 11864. The CMP also states that at a minimum the geographic area examined in the traffic study must include mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during peak hours; it does not say that a 150 trip threshold is always sufficient. **The City was not free to reject Caltrans' instruction about thresholds.** See AR 56281. See *Mejia v. City of Los Angeles*, (2005) 130 Cal.App.4th 322, 342 ("A threshold of significance is not conclusive...and does not relieve a public agency of the duty to consider the evidence...."); *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners*, ("Berkeley Keep Jets") (2001) 91 Cal.App.4111 1344, 1380-82 (agency insufficiently considered site-specific characteristics of noise from airport in favor of standard for threshold of significance). The CMP also states that it chose ICU over HCM solely out of need for a consistent means of measuring congestion across the County. AR 56127-28. This justification — the need for a consistent measure of traffic on County streets -- is irrelevant to the evaluation of freeway traffic congestion and safety. Under these circumstances, there was no reason for the City to cling to the County's CMP to conduct its traffic analysis. The City wrongly used the CMP and its 150 trip threshold in the face of Caltrans' criticism and direction to the contrary. [bold added] *Chalfant p 24*

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The Project will be about 40% larger than The Millennium, and thus, one can anticipate about 40% more impacts. The City is already laying the foundation to disregard CalTrans. The reason for the City's course of action is easy to discern. The adverse impacts of this Project will be so severe that they will be beyond mitigation. Furthermore, the troubles with this Project, especially in combination with the other projects in Hollywood, will be so dire that the Statement of Overriding Considerations will not allow the Project to proceed.

18. The 1988 Hollywood Community Plan has No Commerce Section

The Commerce Section of the 1988 Hollywood Community Plan expired by its own terms in 2010 and Judge Goodman did not revive it. Thus, the Initial Study's reference to the Hollywood Center (page HO-2) relies on a defunct document. Furthermore, the Community Redevelopment Agency which was integral to the Hollywood Center was abolished effective February 1, 2012.

Government Code, §§ 65301(c), 65302 requires that the General Plan and each community plan has a Land Use element and each Land Use element which contains urban area must have a Commerce Section. The 1988 Hollywood Community Plan has no Commerce Section, thereby violating the City's General Plan and Government Code, §§ 65301(c), 65302.

The City has had sufficient time to produce a new Update to the Hollywood Community Plan, but has not done so. Judge Goodman could have addressed the issue of the Commerce Section's being defunct, but he chose not to do so. Now, therefore, developers and the public are left in a legal no man's land.

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For example, after the Hollywood Highland Project proved to be the largest real estate write down in US history, the idea of more density in the prior Hollywood Center, has become an atrocious idea. As shown above, more density has resulted in a significant deterioration of Hollywood.

Community plans are to contain Regional Centers, and the 1988 Hollywood Community Plan has no Regional Center. If one were to say that in 1988 the Commerce Section was the forerunner of the Regional Center, there is no Commerce Section. In brief, the 1988 Hollywood Community Plan is so grossly outdated and inadequate that the entire planning process for Hollywood has fallen into an abyss.

Because the law requires that these planning tools exist and the City has chosen not to have them, all the commerce projects in Hollywood are unlawful.

19. A Very Foolish Developer Would Rely on the 1988 Hollywood Community Plan for His Project

The 1988 Hollywood Community Plan was based upon premises which have proven totally wrong. It was devised when people thought that California's, Los Angeles' and Hollywood's populations would continue to soar upwards. Why any educated person would not realize that there are feedback mechanisms and that tends end and often reverse themselves is a mystery. The causes for the huge increases in Hollywood's population during the 1970's and 1980's were short term and very different factors are now in play.

Our economy was roaring and we needed people. That attracted people not only from the East but also from Mexico. The children of the Baby Boomers were on the move, but within a decade, the children would transition into the family, child rearing phase. Of great importance for Hollywood were the blocks and blocks of single family homes, which were under-priced and in

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need of renovation. Even the mansions in the hills were crumbling. When the City placed a cap on density in Hollywood and drew a line down Franklin Avenue above which no increased density would be permitted, money and families flowed back into Hollywood.

After the housing stock had been purchased and families were being raised, the huge attraction of a single-family home was gone. By 1990, the demographics had shifted. On May 10, 1990, the LA Times reported:

Lockheed's decision this week to move almost all of its aircraft production to Georgia is the latest and most dramatic sign that Southern California's grip on the high-tech, high-wage aerospace industry is weakening.

Aerospace companies have shifted operations from Southern California to small and medium-size cities in Alabama, Arizona, Utah and Georgia, where factories now produce missiles, helicopters, aircraft parts and defense electronics.

The moves are prompted in part by cheaper wages, looser environmental regulations and the opportunity to pick up valuable political support in Congress by locating in more states with influential politicians.

Contributing to the flight out of Southern California has been a widespread perception that the quality of life here has deteriorated amid unaffordable homes, congested highways, polluted air and rampant crime.

The Crossroads Project aggravates each factor which has caused businesses and people to flee this area for over 25 years. The housing units in

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Crossroads are set higher than the average family can afford and they are not family-friendly places. Crossroads will make traffic congestion considerably worse. By attracting more cars into this small portion of Hollywood and by making traffic moving slower, Crossroads will increase air pollution and we have already seen the rampant crime which these types of projects have already brought to Hollywood.

The only way politicos justify mega-projects such as the Crossroads is by the propaganda contained in the EIRs which the courts have ruled was based on false data and wishful thinking.

After reading EIRs for many projects, for the Hollywood Community Plan, for Mobility Plan 2035, one sees that the City has no room for the quality of life of its current residents. Yet, 25 years ago the LA Times made clear that deterioration in the quality of life was a major problem. As noted, the quality of life in Hollywood's Council District #13 deteriorated so much between 2001 and 2010, that it ceased to qualify as a legal council district.

An EIR which cared about the quality of life for Hollywood would have addressed this fact. Instead, the City misleads people by calling the literal death of CD 13 a "revitalization." CD 13 still exists for one reason. There is a 1925 law which requires Los Angeles to have 15 council districts. Due to this law, large sections of Koreatown were added to CD 13 and portions of CD 4 were moved into CD 13.

20. More Recent Data Show the Harmful Nature of TODs

Starting in 1999, data began to accumulate to show that the theory underlying Transit Oriented Districts [TODs] was materially false. *The Relation Between Transit Availability and Automobile Ownership*. TODs do not increase use of mass transit. The correlation to greater use of mass transit is poverty.

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The 2001 Mineta Transportation Institute Study, *A New Planning Template for Transit Oriented Development*, showed that people who live in TODs do not necessarily use the mass transit and often own cars. Thus, the creation of TODs brings more cars and more toxic emissions into closer proximity thereby making the environment more toxic for the people who live in or near the TODS.

These findings present the City planner with an inherent contradiction: while the older plans call for TODs, they also call for less pollution. The situation is worse for TODs which require bike lanes on major thoroughfares where the toxic fumes from traffic are most lethal. Thus, the planning documents call for the multi-modal use of roadways which place bikers at the risk for lung disease by exposing them to maximum dosage of toxic fumes in the entire City.

As has been shown, this Project will attract thousands more vehicle trips into an area which is already experiencing near gridlock of much of the day. The Transportation Element of the General Plan on which the Project relies may be rejected just as the courts rejected the 2012 Update to the Hollywood Community Plan. It has already been retracted and re-issued once and it is still in litigation. When City planning is based upon theories which have been proven to be completely false, traffic congestion becomes worse, air pollution becomes worse, population density and crimes rates increase. We have seen the results of basing planning on false data and wishful thinking: people move away, leaving a council district without enough residents to be legal.

21. Alternatives Not Considered:

The Initial Study does not discuss Alternatives to the Project. The Project is hard pressed to present alternatives as there is no reason to increase the population density of this portion of Hollywood. A project that was 40% smaller at 1,000,000 sq feet would still be unduly harmful. In fact, the mixed-use con-

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struction which has already occurred has been so harmful to Hollywood, that the City should be considering “de-densifying” Hollywood.

The City has been catering to single Millennials, which are transient by nature. They are younger, they move more frequently, they change jobs more often, and they move away from urban cores when they begin families. The Millennials are transitory into two senses: (1) They do not stay long term in the same place, preferring suburbs and exurbs to urban cores, and (2) as a generation, their time-span is limited, e.g. Baby Boomers, Gen X, etc.⁶

Constructing a City for a generational group which already departing is myopic planning. Based upon the data which has accumulated since the 1990's, the main group of people who will “accept” living in cramped urban cores without cars are the very poor. This trend has already begun in Hollywood. As the difference between the 2000 and 2010 US census showed, the socio-economic status of residents in the census tracts contiguous to the subway station decreased. After the City was compelled to stop falsifying the crime data, we see a significant increase in crime in these same and adjacent neighborhoods.

In 2005, HELP termed these persons Default Tenants, i.e. people who cannot afford to move to a better location. The poor can also be called Urban Serfs, in that they are essentially tied to their small area of town as they cannot afford cars. Basing housing decisions on the creating of a permanent subclass of Default Tenants and Urban Serfs is not wise social policy.

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This demographic trend was confirmed in April 2016. *One is Peak Millennials: Three Reinforcing Cycles That Amplify the Rise and Fall of Urban Concentration by Millennials*, by Dowell Myers, USC Sol Price School of Public Policy 2016, which has already been submitted.

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The developer of this [Crossroads] project should take the time to assess what the actual demographic patterns holds for the next 10 or 20 years, or does it have some get-rich scam where it flips the project for a quick buck leaving the investor, from perhaps China, to deal with the financial mess.

When one looks at the myopic planning which is going into Crossroads, The Millennium, and the Palladium [and the HCP2], one is reminded of Cabrini-Green in Chicago and Pruitt-Igoe and The Joseph Darst Apartment in St. Louis. The problem with the propaganda and hype used to promote these developer fiascoes is that the laws of economics hold the trump cards. While the projects squander millions of dollars and needlessly destroy older neighborhoods rather than rehabilitating the homes, the deterioration process consumes decades. The only people who benefit are the developers who are paid to construct the projects.

22. There is No Demand for Apartments and Condos:

The likelihood that there is a real demand for additional housing in Los Angeles is slim. The City refuses to undertake any honest assessment of the housing market. Rather, the City misleads the public into believing that an increase in housing prices means a high demand for housing. Here are some factors which the City does not mention.

a. Prices Rise in Deteriorating Neighborhoods:

Counter-intuitive as it seems, housing values can increase in deteriorating neighborhoods when there is no real demand for additional units. When an over-sized mixed-use project is constructed, people who own homes realize that they can sell their homes for more than they are worth as a R-1 home. Developers will buy an R-1 home with the intent to tear it down and build condos. Until the time comes to tear down a home, it is either left vacant or

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rented out. In either case, very seldom is the property well maintained. That touches off the reverse of Chief Bratton's Broken Windows approach. Repairing homes and removing graffiti reduces crime, but increasing the number of run-down properties increases crime and prompts more people to sell and move. As a result, we see deteriorating neighborhoods with increasing housing prices.

b. Bundling and Securitization of Rental Income:

Another phenomenon is asserting itself in a few housing markets and Los Angeles is one of them. It is the bundling and securitization of residential rental income. This Wall Street scam is very similar to the bundling and securitization of subprime mortgages which crashed the economy in 2008. July 2014, *The Rise of the Corporate Landlord, The Institutionalization of the Single-Family Rental Market and Potential Impacts on Renters*, by Desiree Fields

Rather than sell single family homes and condos as fast as possible to put them back into the actual housing market for people who want to live in them, financial institutions have found extra value in residential properties by bundling and securitizing the rental income. This financial hanky panky means that any home has a value for Wall Street above the value as a place to live. Thus, financial institutions are buying single family homes and condos for above market value. The rise of housing prices due to bundling and securitization does not mean a higher demand for living space; it means Wall Street has invented another scam to fleece the investment world. We had Equity Funding in the 1970's, the Savings and Loans Scandals of the 1980's, the Dot Com frauds of the 1990's, and Subprime scams of the 2000's and now we are

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starting the Rental Securitization scam of the 2010's.⁷

Developers, the public and City councilmember are mislead into believing that the increase in housing costs in Los Angeles has been caused by a significant increase in demand for housing. When one looks at the Sol Price School of Public Policy's studies of population growth for Los Angeles, one sees that there is no such demand. Rather housing prices are increasing due to the bundling and securitization of residential housing;

Affordability:

Tenants could face higher rental costs due to pressure for private equity funds to deliver returns to investors, particularly with the advent of rental bonds. Among Invitation Homes tenants we interviewed in Atlanta, Los Angeles, and Riverside, rents often exceeded the HUD Fair Market Rents for the area; lease renewals increased rents by 37 to 53 percent. The long distance nature of the tenant-landlord relationship and the practicalities of investment strategies may also increase corporate landlords' reliance on financial penalties, potentially limiting tenants' opportunities to seek recourse in cases of hardship. *The Rise of the Corporate Landlord* page 7

c. *The AirBnB Factor:*

It is not yet clear the extent to which the AirBnB phenomenon is increasing the costs of housing in Los Angeles. It seems reasonable that when people can purchase homes and condos and rent them out on a very short term basis for

⁷In the last month, there is some indication that financial institutions like Blackstone may be backing away from the securitization of rental futures.

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well above the mortgage and maintenance costs, that it will drive up housing prices. AirBnB should not be confused with a real demand for additional housing.

d. *Los Angeles' Population is not Increasing Enough to Explain the Increase in Housing Prices*

When one looks at the studies from the USC Sol Price School of Public Policy one realizes that Los Angeles is not growing very fast and the increased population is not due to factors which would significantly increase the demand for housing. *The Generational Future of Los Angeles: Projections to 2030 and Comparisons to Recent Decades*, March 2013, Sol Price School of Public Policy]

The immigration from Mexico to the United States has become a net loss with about 200,000 more people returning to Mexico than are coming to the United States.

The most reasonable explanation for the alleged increase in housing prices is not an increased demand for homes, but it is artificially hyped by various financial schemes. When these scams run their course, the market will fall. Just as there were no new home buyers to keep the subprime scam afloat, there will come a time when the income from bundled and securitized rental packages will plunge. The problem will be what to do with monster projects like Crossroads which were constructed on the basis of false data, propaganda and hype?

23. The Number One Problem Is Excessive Population Density:

The number one problem facing Los Angeles is excessive population density. The notion that the future requires Los Angeles to crowd more and more people in TODs and for these people to shun cars in favor of subways, buses and light-rail has already been proven false. The only people who gain

from this coerced densification are the developers of the high rises and the contractors who construct subways and trolleys. Everyone else suffers.

24. The Data on Which this Project Is Based Is Fatally Flawed and it Wishful Thinking Contrary to the Known Facts of Population Density, Traffic Patterns, and Demographics

Not only does Hollywood not have an operational commerce portion of the Hollywood Community Plan, the Mobility Plan 2035, which is the Transportation Element of the City's General Plan, is similarly based on fatally flawed data and wishful thinking. Among other significant defects, Mobility Plan 2035 fails to consider alternatives to its solution of making traffic worse and trying to force people not to drive cars.

While the City was not under an duty to adopt any particular alternatives, it was under a CEQA duty to study alternatives such as the ones presented by Reason Foundation in its *Increasing Mobility in Southern California: A New Approach*. Despite its title's including the words "a new approach," many of the suggestions in the report have been known for a long time. Under L.A.'s Mobility Plan 2035 (which may or may not be rescinded), the City has only one alternative with different variations on the same theme. There is no actual alternative except to promote fixed-rail transit and TODs. Intellectual dishonesty is integral to the planning process in Los Angeles

Also, the failure of TODs has been documented for over a decade. See also *The Myth of Rapid Mass Transit*, by Richard Lee Abrams, May 30, 2005 also submitted herewith. While the Reason Foundation takes a very large geographic perspective of Southern California, the Abrams 2005 mass transit article discusses transportation on a smaller scale, i.e. TODs in this portion of Hollywood.

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25. The Looming Disaster of the Hollywood Community Plan Update

As HELP and CCLA have shown above, America repetitively falls prey to the most myopic of financial scams. Politicians have no room for facts. Like much of Wall Street, they operate on a short term timetable which encourages them to do what benefits themselves in the short run. Term Limits aggravate this tendency since the politician know that there is no personal advantage to taking the long term health of the City into consideration. It takes time for disasters to hit home and when they do, the politicians are on to a higher office. Although Eric Garcetti literally destroyed his council district in less than ten years, he suffered no political harm. He claimed that he had revitalized Hollywood, despite the fact he had destroyed Hollywood. The political fall-out hit Carolyn Ramsay, who had been Councilmember Tom La Bonge's chief of staff when she ran for council district CD 4. The dual endorsement of the L.A. Times and Mayor Eric Garcetti tipped the scales to new-comer David Ryu, who upon election fell into lock-step behind Garcetti.

As a result, the density hawks are still in full control at City Hall and it doesn't take a psychic to know why there has been no new Update to The Hollywood Community Plan.⁸ The City is pushing a multitude of mega-density projects in Hollywood such as 8150 Sunset at Crescent Height, The Palladium at 6201 Sunset, the Millennium north of the Pantages Theater, 7500 Sunset Boulevard, 6230 Yucca just north of The Millennium, The Paseo Plaza Project at the old Sears site (proposed 700 housing units), 7107

⁸The NOP for HCP2 did not issue until April 29, 2016 more than two years after Judge Goodman rejected HCP1.

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Hollywood Boulevard, as this Crossroads Project. The City still allows the developers to set the zoning laws and that is why the City is delaying the Update to the Hollywood Community Plan. It is waiting to see all the excesses which the developers desires and then the City will include each one into the new Update to the Hollywood Community Plan.

There are billions of development dollars at stake, and these billionaires have no intention of walking away from this extraordinarily lucrative market. They care naught that they are bringing economic disaster upon Hollywood. They are using LLC's and LLP's coupled with other short term financial instruments in order to loot the City treasury and stuff as much state and federal subsidies as possible into their pockets.

This ploy has been ineptly applied to the Target Store. Right now, the City foresees a legal loss on the Target Project in the appeals court. Thus, it is starting the approval process from scratch. The City believes that if it changes the law which invalidated The Target Project, then the construction can continue. By refusing to conduct an EIR to study the change of SNAP to add a Subarea F, the City is following an unlawful procedure to change the law which will plunge The Target into another 4 to 5 years of litigation.

Nonetheless, we notice that the City is beginning to recognize the need to follow the law. Leaving aside the litigation which will follow from the new Update from the Hollywood Community Plan, if it were instituted, it will bring more disaster upon Hollywood. When Gail Goldberg remarked in 2006 that the City's practice of allowing developers to set zoning was leading to disaster, she was not referring to lawsuits. Her point was that there are various "laws of nature" which cannot be violated

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without bringing disaster upon the City. 2008-2-7 LA Weekly, *City Hall's "Density Hawks" Are Changing L.A.'s DNA*, By Steven Leigh Morris, <http://bit.ly/1CxiGep>

The new Update to the Hollywood Community Plan [HCP2] will set forth every mega-developers' wish-list making whatever they wish to construct completely legal. The City is apparently waiting for the developers to finish writing their various wish lists and when the developers' greed has run its course, then we will see the Update to the Hollywood Community Plan.

We have already seen where this type of corruptionism leads. How much is the stock in Equity Funding worth? Where is Lincoln Savings and Loan? Who can remember the names of the Dot Com companies? Politicos have already forgotten about the Crash of 2008 and they are eagerly promoting the bundling and securitization of residential rental income – which is another Wall Street delusion justifying the re-newed Hollywood construction mania.

26. Conclusion:

Assessment of this Project cannot be separated from the problem of increasing urban densification in Hollywood and the gross inadequacy of mass transit to solve any of the problems which densification projects such as Crossroads will bring to Hollywood.

Disentangling the different factors can be difficult and the task is made impossible for councilmember themselves when they are presented

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with false data and when vital information is concealed from them. Rational planning is made much more difficult with the unlawful vote trading agreement with dominates City Council. Each councilmember is promised a free hand for all projects in his/her district and in return he/she shall not vote NO on any project in another district.

Thus, councilmembers have two hurdles: (1) The data is false, (2) they are not allowed to have an opinion other than “I approve.”

Respectfully submitted,
Hollywoodians Encouraging Logical Planning [HELP
and
Citizens Coalition Los Angeles [CCLA]

LIST OF ARTICLE AND EXHIBITS SUBMITTED

1. 1915 Study of Street Traffic Conditions in the City of Los Angeles
2. *The Relation Between Transit Availability and Automobile Ownership: the Case of Los Angeles County*, University of New Orleans, School of Urban and Public Affairs, by Devajyoti Deka, 1-1-1999
3. December 30, 2010, Streetblog, *Density, Car Ownership, and What It Means for the Future of Los Angeles*, by Damien Newton
4. FHWA NHTS BRIEF 2014, Mobility Challenges for Households in Poverty
5. March 2014, URBAN INSTITUTE, *Driving to Opportunity: Understanding the Links among Transportation Access, Residential Outcomes, and Economic Opportunity for Housing Voucher Recipients*.

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6. August 22, 2013, NewGeography, *Mobility for the Poor: Car-Sharing, Car Loans, and the Limits of Public Transit*, by Joel Kotkin
7. January 3, 2013, LA Weekly, *Hollywood's Urban Cleansing 12,878 Mostly Latinos Are Pushed Out by City Hall, High Rents and Hipsters*, by Patrick Range McDonald
8. Judge Chalfant *Statement of Decision* in the Millennium Project
9. Judge Allan Goodman's January 15, 2015 *Statement of Decision* in the Hollywood Community Plan litigation
10. 2001 Mineta Transportation Institute Study, *A New Planning Template for Transit Oriented Development*
11. November 2015, Reason Foundation in its *Increasing Mobility in Southern California: A New Approach*.
12. *The Myth of Rapid Mass Transit*, by Richard Lee Abrams, May 30, 2005
13. November 3, 2015, FORBES, *So Much For The Death Of Sprawl: America's Exurbs Are Booming*, by Joel Kotkin
14. *The Generational Future of Los Angeles: Projections to 2030 and Comparisons to Recent Decades*, March 2013, The Sol Price School of Public Policy by Myers and Pitkin
15. July 2014, *The Rise of the Corporate Landlord, The Institutionalization of the Single-Family Rental Market and Potential Impacts on Renters*, by Desiree Fields
16. 2008-2-7 LA Weekly, *City Hall's "Density Hawks" Are Changing L.A.'s*

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DNA, By Steven Leigh Morris, <http://bit.ly/1CxiGep>

17. April 1, 2015, *Why Older Millennials Are Leaving the Urban Core and Younger Millennials Aren't Far Behind* by Ryan Servino

18. July 16, 2015, *Urbanism, Millennials Will Live In Cities Unlike Anything We've Ever Seen Before* by Alissa Walker

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