

Bel Air Beverly Crest Neighborhood Council  
Comments on the Hollywood Community Plan Update  
DRAFT  
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## **INTRODUCTION**

The Hollywood Community Plan Update presents a meaningful opportunity to address development priorities in the hillsides. The attention to the hillsides in the current draft is, however, far from adequate. Hillsides belonging to the Hollywood Plan Area are generally zoned for low-density residential development, and this might seem to indicate that attention to development plans is unimportant. The opposite is the case. The hillsides are a natural resource for the community and city as a whole. The high pace of development degrades that resource, and without attention to planning there is no check on that degradation.

In many hillside communities, ingress and egress can be challenging. Both increasing density and the process of construction itself can curtail the ability of residents to come and go routinely. Emergency evacuation or emergency vehicle access may be impossible in some areas.

Further, specific features of the hills (their visibility from afar and acoustics come to mind) warrant special attention as well. Without addressing these types of issues, the Hollywood Community Plan Update is incomplete and does not adequately address the needs of residents.

## **GENERAL PRIORITIES**

### **Long-Term Habitation**

In many hillside neighborhoods, a significant percentage of homes are unoccupied or are only occupied by short-term renters. Many of these homes are speculative investments or rental investments, and the owners may have no connection to the neighborhood whatsoever. When neighborhoods are not populated by people who live in them, the neighborhood is damaged. Human connections are limited. People have diminished access to the support neighbors might provide. While investing in single-family dwellings cannot be prohibited, the general adoption of a policy favoring regulation that promotes long-term habitation of dwellings and discourages speculative investing will strengthen hillside neighborhoods.

While the cultivation of neighborhood relationships is beneficial anywhere, it is especially important in the hillsides because of the greater probability of catastrophic natural events there. Any natural disaster will require neighborhood cooperation, and longer-term relationships between neighbors will enhance the abilities to evacuate and to otherwise cope with an emergency.

## **Environment**

The hillsides covered by the Hollywood Community Plan are home to important environmental resources. Undeveloped, public and privately held open space provides numerous benefits. This land has ecological worth as well as aesthetic benefit enjoyed by those who view the hillsides as well as those who live in the hillsides and those who merely pass through. The open areas of the hills can be seen from many areas of the city, and this provides respite from the extensive urbanization of the flat lands to millions of area residents. Numerous ecosystems depend on habitat provided by undeveloped land as well as on the ability to pass from one wild area to another. Finally, large privately-held swaths of open space in our area are often home to walking trails that provide for meaningful public enjoyment of the outdoors. Numerous specific environmental resources found in the hillsides also confer clear and significant benefit to the community or the natural world. Preservation of these resources as well as the protection of open space should be fundamental guiding principles present in the Hollywood Community Plan.

## **Infrastructure**

The infrastructure in the hills is failing. Many roads are crumbling and haven't been fixed in decades. The water and sewer pipes are among the oldest in the city. The electrical grid was neglected for many years and has yet to be upgraded. This is a disaster waiting to happen. Upgrading hillside infrastructure must be a priority made explicit in the Hollywood Plan.

## **POLICY SUGGESTIONS**

### **Zoning**

#### **Home-size limitations**

The update currently includes a much-needed policy of discouraging out-of-scale homes in the hillsides. Without further clarification, simple zoning will be determined to be sufficient. Simple zoning is not sufficient.

In many areas, multiple lots of vacant land can be purchased and combined, and zoning laws would provide for an extremely large residence. In practice, this has meant that permits for ten-thousand square foot homes are issues in areas where the average home size is more like two thousand square feet. These are clearly out-of-scale homes.

In order to effectively discourage these types of dwellings, a more precise rule relating to surrounding home sizes needs to be included. Not allowing permits for homes more than 25% greater than the average square footage in a 500 yard radius or greater than 1% larger than the

largest home in a 100 yard radius would lead to the intended result. Another alternative would be to dictate local maximum sizes based on these principles.

## **Zoning variances**

Since hillside development presents special challenges, many developers of hillside properties seek relief from zoning regulations. Often they ask for significantly more than the allowable square footage and/or significant relief from setbacks or height requirements. Decisions about relief are made on a case-by-case basis, and the leeway given to zoning administrators is exceptionally broad.

A system such as this is prone both to corruption and to degradation of zoning regulations through the precedent of regular deviation from those ordinances. Acceptable reasons for seeking relief and acceptable margins of divergence should be codified and actual adherence to code should be encouraged.

In addition, development on properties on private streets should follow zoning rules or be required to have a zoning administrators determination to the contrary, even when the divergence from zoning rules relates to the street and not to the dwelling itself.

## **Environmental**

### **Open Space**

The plan provides the opportunity to protect, increase access and quantity of open space which is in direct alignment with the Sustainable City pLAN of the Mayor's office. Having Angelenos live within ½ a mile of accessible parkland and open space by 2030.

It is important for the Community Plan to identify specific resources within the Hollywood Hills and adjacent neighborhoods. In the Bel Air Beverly Crest Neighborhood Council Area, this includes privately held land and unnamed publicly held land.

The amount of open space diminishes every year, Privately held lots, often despite the extreme challenges of building on them, continue to be developed. Without policy changes directed towards preservation of this open space, that all privately held open space will disappear is a virtual certainty.

Without open space preservation, we will no longer have the heat island effect mitigation, carbon sequestration, aquifer recharging, stormwater runoff reduction, air pollution reduction, increased biodiversity, improvements to health and wellness, equity and long term resilience of the socio-ecological system underlying our community that open space confers.

Zoning can make building less desirable. Other incentives should be made available that encourage the conversion of privately-held open space to public holding.

### **Tree Preservation**

Trees and brush, whether protected or not, confer significant benefit to the ecosystem as a whole. Environmental analyses for development projects seeking discretionary permits should be required to account for all habitat loss regardless of protection of specific species.

### **Wildlife Connectivity**

The Plan should explicitly recognize that wildlife corridors that are crucial for the survival and preservations of the large omnivores and carnivores that are roaming our community. Any development that encroaches on these corridors degrades the ecosystem. Therefore, all development that occurs on lots on mapped wildlife corridors should not be eligible for CEQA exemptions except in cases where the footprint of the development does not exceed the size of the pre-existing building.

Wildlife-friendly fencing should be required on all such projects, and easements for known migration paths and wildlife food sources protection should be integrated into the permitting process.

Protection of wildlife corridors should be a general policy principle for the Hollywood Community Plan.

### **Streets and Traffic**

#### **Traffic**

The Plan Update rightly includes the statement that collector streets should not be through streets. Because drivers are seeking to avoid traffic on major arteries, a number of collector (and smaller) streets in the hillsides have become through streets bearing heavy traffic. The infrastructure isn't up to the task.

Without specific policy that would discourage collector-street shortcuts and without any effort to re-classify and upgrade streets currently being used, this directive is meaningless.

### **Funding Infrastructure**

The hillsides are home to some of the most extravagant development in the city. That this development occurs in neighborhoods with degrading infrastructure seems like a missed

opportunity. Every developer of a hillside lot should be subject to an infrastructure improvement fee that is proportionate to the scale of the property being built.

### **Controlling Construction Impacts**

#### **HCR Update**

The Hillside Construction Regulation needs to be updated to more specifically address construction impacts in the Hollywood Hills. The regulations to this point have been developed with Bel Air in mind, and the Hollywood Hills differ considerably from those further west. We have smaller lots, greater population density and a large number of substandard streets that present significant challenges to development.

The entire Hollywood Hillside Community Plan Area should be a Hillside Construction Regulation area.

#### **Limits on available permits**

The hills present very serious ingress and egress issues. In an emergency, an emergency vehicle should be able to get in and/or residents should be able to get out. The scale and quantity of construction interfere with this capacity in several areas of the hillsides.

Availability of permits in these areas must be limited in order to insure safety of residents, even if this means that developers might have to wait to construct their building. Sacrificing safety for profit or some misguided conception of property rights is unacceptable, and the Hollywood Community Plan should address this.

Further, a hazard area designation must be available, and within those areas developers must be able to prove that commencement of their development will not dangerously restrict ingress and egress.

#### **Construction Coordination**

Because so many projects share certain roadways and avenues of access, failure to coordinate can restrict emergency access. The Hollywood Community Plan should advocate for funding for an Office of Hillside Construction Coordination.

#### **Smaller vehicles for hauling and other functions**

Developers will always favor the largest, most efficient piece of equipment, but this is at a cost to neighbors' safety (and convenience). To the extent possible, a maximum vehicle size for substandard streets should be determined and enforced. Smaller haul vehicles should be

required on substandard streets. 10-wheel and Super-10 dump trucks wreak havoc on roads and often damage neighbors' property.

### **Noise**

Sound travels in the hills, and therefore can be impact a greater number of neighbors than the same sound in the flats. The need for a hillside-specific noise ordinance should be included in the Hollywood Community Plan.