

Governance in Crisis: A Report on Public Safety Failures in the Lake Hollywood Area and the Endangerment of Community and Critical Infrastructure

1. Executive Summary

The Lake Hollywood area, a residential enclave nestled against the iconic backdrop of the Hollywood Sign and Griffith Park, is currently embroiled in a severe and escalating public safety crisis. This crisis, characterized by pervasive traffic congestion, rampant illegal parking that obstructs emergency access, uncontrolled commercial exploitation, and heightened fire risks within a Very High Fire Hazard Severity Zone (VHFHSZ), is not an inevitable consequence of tourism. Rather, it is the direct result of protracted and systemic governance failures by the City of Los Angeles, the Santa Monica Mountains Conservancy (SMMC), and, to a lesser degree through its promotional activities, the Hollywood Sign Trust.

This report documents these failures, focusing on a persistent pattern of non-enforcement of mandatory public safety codes related to traffic, parking, fire safety, park usage, and commercial activities. Despite years of resident complaints, official studies acknowledging the hazards, and numerous City Council actions ostensibly aimed at mitigation, the responsible entities have failed to implement effective, sustained solutions. This dereliction of duty has created foreseeable and ongoing threats to community safety, impeded critical emergency vehicle access, and placed vital telecommunications infrastructure on Mount Lee at unacceptable risk. The Mount Lee facility, a vital hub for emergency services and city agency communications, is exposed to a confluence of risks—significant fire hazards, vulnerabilities associated with public trail access, and operational impediments due to local traffic conditions—all exacerbated by the unmanaged crisis in the surrounding areas.

The regulatory landscape for protecting assets like Mount Lee is multi-layered, involving state statutes such as the Public Utilities Code and Government Code, alongside local ordinances from the City of Los Angeles, particularly its Fire Code and Municipal Code provisions for VHFHSZs. While robust regulations exist, particularly for fire risk, their effective application is undermined by the lack of coordination and enforcement detailed herein. Potential gaps also exist in the specificity of regulations addressing the security of telecommunications infrastructure within public recreational areas and in ensuring dedicated power resilience for such critical facilities during widespread emergencies.

The City of Los Angeles, through its various departments including the Department of Transportation (LADOT), Fire Department (LAFD), Department of Recreation and Parks (RAP), and the City Council, bears primary responsibility. The SMMC, through its management of adjacent parklands and trails, contributes to the crisis by failing to adequately coordinate with the City and mitigate the impacts of visitor access. The Hollywood Sign Trust also plays a role by promoting access to the Sign without ensuring commensurate safety measures are in place.

Urgent, comprehensive, and coordinated remedial action is imperative to restore public safety, protect critical infrastructure like Mount Lee, and hold the responsible entities accountable for their prolonged and damaging inaction. Failure to do so will not only perpetuate the current dangers but also invite catastrophic consequences, particularly in the event of a wildfire or other major emergency.

2. Introduction: The Unmanaged Crisis in Lake Hollywood – A Dereliction of Governance

The communities surrounding Lake Hollywood and the western access points to Griffith Park are facing a public safety crisis of significant proportions. This situation, far from being a recent development, is the culmination of years of inadequate governance, insufficient planning, and a systemic failure to enforce mandatory public safety codes by the very entities entrusted with protecting the public and managing these valuable resources. The allure of the Hollywood Sign and the recreational opportunities of Griffith Park have been allowed to overwhelm the infrastructure and safety capacities of adjacent residential neighborhoods, leading to conditions that endanger residents, visitors, and critical public infrastructure, notably the Mount Lee Communications Center.

Overview of the Public Safety Crisis

The public safety crisis in the Lake Hollywood area is multifaceted, manifesting daily in ways that degrade the quality of life and actively threaten safety. Chronic traffic congestion on narrow, winding hillside streets is a constant, exacerbated by an unrelenting influx of tourist vehicles and commercial tour buses. Residents report gridlock that makes basic ingress and egress from their homes an ordeal, with some describing the situation as a "total shit show," particularly during peak tourist seasons. This congestion is compounded by rampant illegal parking, including vehicles blocking driveways and, critically, parking in designated fire lanes, thereby impeding potential emergency vehicle access.

Speeding is another persistent hazard. Despite posted speed limits, the area experiences dangerous driving conditions, a concern highlighted by residents and acknowledged in City-commissioned studies. Uncontrolled commercial activity, ranging from large tour buses navigating unsuitable roads to potentially unpermitted vendors, adds to the chaos and safety risks. Perhaps most alarmingly, these conditions persist within a Very High Fire Hazard Severity Zone (VHFHSZ), where unimpeded emergency access and strict adherence to fire safety codes are paramount. The Hollywoodland Homeowners Association has starkly warned that their community is "80% surrounded by dry brush" and that "every parked car on our much narrower, substandard residential hillside streets prevents two way traffic," recalling a past incident where a resident died in a house fire when first responders faced navigational difficulties.

Introduction to the Roles and Responsibilities of Key Entities

Addressing this crisis involves a complex web of governmental and non-profit entities, each with specific duties and jurisdictions:

- **City of Los Angeles:** The City holds the broadest municipal powers and responsibilities. This includes traffic management through the Los Angeles Department of Transportation (LADOT), fire prevention and emergency response through the Los Angeles Fire Department (LAFD), management of City parks like Griffith Park through the Department of Recreation and Parks (RAP), and overall land use planning and code enforcement through various departments and the Los Angeles Municipal Code (LAMC). The City Council and Mayor provide legislative oversight and budgetary authority.
- **Santa Monica Mountains Conservancy (SMMC):** Established by the California Legislature, the SMMC has statutory duties to acquire, preserve, and manage lands within the Santa Monica Mountains Zone for recreational, ecological, and open space purposes. This zone includes areas impacting Griffith Park and access to the Hollywood Sign. The SMMC, often acting through the Mountains Recreation and Conservation Authority (MRCA), has the authority to regulate public use and ensure safety on its properties, including trails.
- **Hollywood Sign Trust:** A 501(c)(3) non-profit organization, the Trust's mission is to "repairing, maintaining, refurbishing, and providing capital improvements to the Hollywood Sign or related thereto for the benefit of the public at large and so as to help preserve and maintain the image of Hollywood as the worldwide center of the

entertainment industry". It is also responsible for physically maintaining and securing the Sign and operates the official Hollywood Sign website, which includes information on hiking trails to view the Sign.

Crisis

The persistent and escalating public safety crisis in the Lake Hollywood area is not an unfortunate byproduct of tourism but a direct and foreseeable consequence of a systemic breakdown in governance. This failure is characterized by the chronic non-enforcement of mandatory public safety codes, inadequate planning, and a lack of accountability by the City of Los Angeles, the SMMC, and the Hollywood Sign Trust, thereby creating dangerous conditions and exposing the community and critical infrastructure, including the Mount Lee Communications Center, to severe risks.

The challenges in Lake Hollywood are significantly amplified by a fragmented and often uncoordinated governance structure. While the City of Los Angeles manages its streets through LADOT, its parks via Recreation and Parks, and fire safety through LAFD, the SMMC and MRCA oversee adjacent parklands and crucial trail networks. Concurrently, the Hollywood Sign Trust actively promotes the Sign as a tourist destination, including directing visitors to hiking trails. This division of responsibilities necessitates a high degree of collaboration to manage the cumulative impacts of tourism. However, the evidence suggests a critical deficiency in this inter-agency coordination. For instance, traffic congestion, often originating on City-managed streets, directly affects access to SMMC/MRCA and Recreation and Parks lands, including Griffith Park. This congestion is fueled by tourism driven by the Hollywood Sign, an attraction promoted by the Trust. The pervasive fire risk is a shared concern, as the area is designated a VHFHSZ, demanding unified safety protocols across all jurisdictions. Effective solutions, therefore, hinge on integrated efforts. LADOT's traffic management strategies must be harmonized with Recreation and Parks' trail management policies and SMMC's access regulations. When one entity, such as the Trust, encourages visitation without corresponding commitments from other agencies to manage the resultant impact on infrastructure and safety, the entire system falters. Consequently, the crisis is not merely a sum of individual agency shortcomings but a failure of the overarching system of governance. This systemic collapse forms a crucial basis for legal arguments focusing on a pervasive and actionable pattern of negligence.

3. Systemic Non-Enforcement: A Pattern of Neglect and its Perilous Consequences

The public safety crisis in the Lake Hollywood area is rooted in a demonstrable and sustained pattern of non-enforcement of mandatory codes and regulations. This failure spans traffic management, parking controls, fire safety mandates, and the regulation of commercial activities, creating a dangerous and often chaotic environment for residents and visitors alike.

3.1 Failure to Manage Traffic and Ensure Safe Access

Despite the City of Los Angeles' adoption of the "Vision Zero" initiative in 2015, which set an ambitious goal of eliminating traffic fatalities by 2025, the reality on the city's streets, and particularly in high-pressure zones like Lake Hollywood, paints a starkly different picture.

- Non-enforcement of Speed Limits and Traffic Calming Measures:

The City's own 2024 Vision Zero Safety Study reveals a disturbing trend: Killed and Severely Injured (KSI) collisions increased by approximately 13% citywide between 2017 and 2021, with unsafe speed identified as the primary violation in 40% of vehicle-only collisions resulting in a fatality. This city-wide failure to curb dangerous speeding provides a critical context for understanding the specific hazards in the Lake Hollywood area. Griffith Park, a major destination accessed through Lake Hollywood, has a posted speed limit of 25 mph. However, persistent resident complaints about excessive speeding and the explicit recommendations for traffic calming measures, such as speed humps on Canyon Lake Drive, in the 2018 Dixon Unlimited Inc. ("Dixon Study") report on Griffith Park access, indicate widespread non-compliance and a significant lack of effective enforcement. The City's awareness of the

problem is thus long-standing. LADOT's 2024 Vision Zero Safety Study acknowledges that "limited time is available to perform field observations...it is beyond the scope of work to perform in-depth 'hot spot' evaluations at all locations". This admission suggests a misallocation of resources or an insufficient prioritization of known, high-risk areas like Lake Hollywood, despite years of documented issues and community outcry. The City's general acknowledgment of rising KSIs and the prominent role of speed, combined with specific, unheeded recommendations for the Lake Hollywood area detailed in reports like the Dixon Study, and the continuous stream of resident pleas, firmly establishes both actual and constructive notice of the dangerous conditions. The persistent failure to implement effective traffic calming measures or ensure consistent enforcement in the face of this notice is a critical element demonstrating negligence. The sequence is clear: the City is aware that speed is a lethal factor in traffic incidents; it has a declared policy to eliminate traffic deaths; yet fatalities and severe injuries are on the rise. Simultaneously, specific, hazardous locations like Canyon Lake Drive were identified years ago, with viable solutions proposed, and residents have unceasingly reported dangerous speeding. This is not an issue of lacking information, but a manifest failure to act decisively and effectively upon available knowledge, which is a cornerstone for establishing negligence and a breach of the statutory duty to maintain public property in a safe condition, as outlined in California Government Code §835.44

- Non-enforcement of Parking Restrictions, Including Fire Lanes:

The chaotic parking situation is a major contributor to the public safety crisis. Residents frequently report vehicles parked illegally in their driveways, blocking access, and creating general mayhem. News reports and community association communications corroborate these issues, particularly concerning illegal parking on Canyon Lake Drive and the Hollywoodland Homeowners Association's (HHA) highlighting of cars parked on narrow streets, effectively preventing two-way traffic and emergency vehicle passage. This problem is so acute that even a City Council File concerning paid parking at Lake Hollywood Park (CF 23-0706) includes public comment noting that newly implemented 15-minute parking limits on Canyon Lake Drive are failing to reduce road stoppages or wrong-direction parking due to a fundamental lack of enforcement.

The California Fire Code §503 explicitly mandates that fire apparatus access roads shall not be obstructed and must maintain a minimum clear width, typically 20 feet. Regulations require the posting of "NO PARKING FIRE LANE" signs and the painting of red curbs, but their efficacy is entirely dependent on consistent enforcement. The Los Angeles Fire Department's (LAFD) Red Flag Restricted Parking Program, designed to remove illegally parked vehicles in VHFHSZs that could impede emergency access during critical fire weather, acknowledges the inherent danger. However, the persistence of obstructed fire lanes and access routes in the Lake Hollywood area indicates that this program is either insufficiently scoped, under-resourced, or inadequately enforced in this critical zone. The non-enforcement of parking restrictions, especially within a VHFHSZ characterized by narrow, winding roads, directly establishes a "dangerous condition of public property" under Government Code §835.44 by critically impeding emergency vehicle access. This is not merely an inconvenience; it is a life-threatening lapse in governance. The City's documented awareness of this specific hazard—evidenced by its own Red Flag programs and specific council actions addressing parking—juxtaposed with its continued failure to resolve the issue, points towards a disturbing level of deliberate indifference or gross incompetence. The existence of the Red Flag parking program itself demonstrates the City's knowledge that parked vehicles in these zones constitute a severe hazard. The continued blockages signify that the program is either failing in its objectives or is not being applied with the necessary rigor in this specific, highly vulnerable area. This failure to enforce critical safety codes in a known high-risk area, despite having programs designed to address it, represents a profound breach of the City's duty of care.

- Uncontrolled Tour Bus Operations:

The operation of tour buses on the narrow, challenging streets of the Hollywood Hills has been a long-standing issue. In response to safety concerns, the City enacted Los Angeles Municipal Code (LAMC) §80`6.11, establishing a Tour Bus Ordinance. LADOT subsequently identified 30 street segments for restriction or limitation, with new signage reportedly installed in Spring 2024. City Council File 17-1115 and its supplement S1 provide a detailed history of the City's efforts to regulate tour buses, including LADOT reports identifying unsafe streets and discussions regarding LAPD enforcement challenges. The Hollywood Hills West Neighborhood Council (HHWNC) has been a persistent advocate, reporting issues and requesting LADOT evaluations of problematic streets for years. Councilmember Raman's office has also acknowledged the ongoing tour bus issues, particularly west of the 101 freeway, and LADOT's study of these areas.

Despite these regulatory efforts, which one former councilmember noted were "seven years in the making", resident complaints about dangerous tour bus operations and their contribution to traffic congestion continue. The HHWNC and other community stakeholders are still actively pushing for expanded restrictions and more effective enforcement. This suggests that the City's response has been reactive and incremental, rather than proactive and comprehensive. The "unscrupulous tour bus operators" mentioned by former Councilman Ryu appear to continue finding ways to operate unsafely, implying significant gaps in enforcement or loopholes in the existing regulations. The regulatory framework exists, but its implementation and enforcement are evidently lagging, incomplete, or too easily circumvented. The problem of unsafe tour bus operations has not been definitively resolved, indicating that the City's piecemeal approach—often spurred by persistent community advocacy rather than a comprehensive, forward-looking strategy—fails to adequately address the scale and persistence of this safety hazard.

- Inadequate Pedestrian Safety Measures:

Pedestrian safety in the Lake Hollywood area is severely compromised. The 2018 Dixon Study highlighted a critical deficiency along Canyon Drive, where pedestrians are met with abrupt sidewalk endings, forcing them to walk in the roadway alongside vehicular traffic. This is particularly alarming given LADOT's Vision Zero data, which indicates that pedestrians are involved in 38% of all KSI collisions city-wide, despite accounting for only 16% of trips. This statistic underscores the heightened vulnerability of pedestrians throughout Los Angeles, a risk that is significantly amplified in areas like Lake Hollywood, which attract high volumes of tourist foot traffic to areas with demonstrably inadequate pedestrian infrastructure. Furthermore, comments within Council File 23-0706 reveal a continued need for basic data, such as the installation of sensors to simply understand the magnitude of pedestrian traffic in the area. This implies a reactive approach to pedestrian planning, rather than proactive measures based on foreseeable demand. The convergence of high pedestrian tourist volumes drawn by the allure of the Hollywood Sign, documented sidewalk deficiencies forcing pedestrians into vehicular paths, and a city-wide pattern of high pedestrian KSI rates creates an inherently dangerous environment. The persistent lack of proactive pedestrian infrastructure improvements, despite clear awareness of these risk factors, constitutes a significant governance failure. The City is demonstrably failing to provide safe passage for pedestrians in an area it knows is heavily trafficked by them and where the existing infrastructure is known to be dangerously deficient.

- Impact of Trail Access Decisions and Tourism Promotion Without Commensurate Infrastructure/Enforcement:

The influx of visitors to the Lake Hollywood area is significantly influenced by the promotion of access to the Hollywood Sign. The Hollywood Sign Trust, for example, actively promotes hiking trails to the Sign on its official website, directly contributing to visitor numbers. City actions, such as the controversial closure of the popular Hollyridge Trail access point from Beachwood Canyon following the *Friends of Griffith Park v. City of Los Angeles* lawsuit, have had the effect of redirecting tourist traffic to other, often less prepared, access points. This shift has likely exacerbated congestion and safety issues in areas like Lake Hollywood Park and along Canyon Lake Drive, as

these areas were not equipped to handle the displaced visitor load, nor was there adequate City planning to mitigate these foreseeable consequences.

Councilmember Raman's office has acknowledged the surge in tourism, partly fueled by social media, and has pointed to a historical lack of consistent funding or comprehensive traffic management plans for the affected areas. While some discretionary funds were reportedly secured for traffic control in fiscal year 2023-24, this reactive funding suggests years of preceding neglect. The 2018 Dixon Study 6 and subsequent City Council actions 2 discussed strategies for improving access and managing tourism impacts, but the implementation of comprehensive, effective solutions has been notably slow or piecemeal. Indeed, residents voiced concerns that the Dixon proposals would "FORMALLY create, sponsor, and operate a worldwide tourist magnet in the midst of an extremely substandard residential neighborhood" 2, highlighting the inadequacy of local infrastructure. There exists a fundamental and dangerous disconnect between the implicit and explicit promotion of tourism by the City and entities like the Hollywood Sign Trust, and the critical failure to invest in the necessary infrastructure and enforcement mechanisms to manage the resultant impacts safely. Decisions regarding trail access, while potentially addressing localized issues, can have severe negative consequences on other unprepared areas if they are not integrated into a holistic, adequately resourced management plan. The City and its allied entities are, in effect, inviting massive numbers of people into an area that cannot safely accommodate them, without taking substantive responsibility for mitigating the inevitable negative consequences on public safety and resident quality of life. This pattern of behavior points to a governance model that, in these specific residential areas, prioritizes the perceived benefits of tourism over the fundamental safety and well-being of the community.

3.2 Abdication of Fire Safety Mandates in a High-Risk Zone

The Lake Hollywood area's location within a Very High Fire Hazard Severity Zone (VHFHSZ), as designated by both the LAFD and California state law, imposes stringent fire safety mandates that appear to be inadequately enforced. This laxity creates an unacceptable level of risk for residents, visitors, and critical infrastructure.

- Non-enforcement of Brush Clearance Regulations:

Both the Los Angeles Municipal Code (LAMC §57.4906.5.2 and Ordinance No. 172,054) and state law (Public Resources Code §4291) mandate extensive brush clearance and the creation of defensible space around structures—typically 200 feet—and along roadways and combustible fences. The LAFD operates a Brush Clearance Unit and an annual inspection program, with notices mailed to property owners and inspections scheduled between May and June, and fees assessed for non-compliance.

Despite this established program, the Hollywoodland Homeowners Association reports that their neighborhood remains "80% surrounded by dry brush in a very high fire severity zone". This statement strongly suggests that the existing clearance program may be insufficient in scope, inconsistently enforced, or that the sheer volume of hazardous vegetation in the steep, difficult-to-access terrain overwhelms current efforts. The "year-round responsibility" for brush clearance emphasized by LAFD may not be consistently met by all property owners, and the presence of homeless encampments, which LAFD documentation acknowledges as a concern requiring reporting, can introduce additional ignition risks in areas with overgrown vegetation. While a formal program exists, its practical effectiveness in comprehensively mitigating the fire risk in the complex environment of Lake Hollywood is questionable. The scale of the problem, coupled with potential inconsistencies in enforcement or landowner compliance, may leave the area dangerously vulnerable. Any deficiencies in brush clearance enforcement within a VHFHSZ directly and substantially increase the risk of a catastrophic wildfire, posing an imminent threat to lives, homes, and the critical communications infrastructure located on Mount Lee.

- Failure to Maintain Clear Fire Lanes and Emergency Vehicle Access:

As extensively detailed previously (Section 3.1.2), obstructed fire lanes and impeded emergency vehicle access are chronic and critical problems in the Lake Hollywood area. This situation directly contravenes the explicit requirements of the California Fire Code §503, which mandates that fire apparatus access roads be kept clear and unobstructed, typically maintaining a minimum width of 20 feet. The LAFD's own Red Flag Restricted Parking Program underscores the City's awareness that illegally parked vehicles on narrow hillside roads create dangerous "choke points" that can hinder emergency response and evacuation efforts. The continued existence of these choke points, despite the program, signals a significant failure in its implementation or broader enforcement strategies.

The Hollywoodland Homeowners Association has provided stark testimony regarding this danger, stating, "Every parked car on our much narrower, substandard residential hillside streets prevents two way traffic" and referencing a past fatality in a house fire where first responders encountered difficulties navigating these obstructed streets. Regional wildfire incidents, such as the Franklin Fire in Malibu which led to road closures and evacuation challenges, further illustrate the critical importance of maintaining clear and accessible emergency routes in hillside communities. The failure to ensure such access in a VHFHSZ known for its narrow, winding roads and intense tourist traffic represents a severe and ongoing dereliction of duty. This is not merely a matter of code violation; it is the active creation and perpetuation of conditions that could lead to catastrophic loss of life and property during a wildfire or other major emergency, thereby constituting a "dangerous condition of public property".

- Inadequate Oversight of Utility Infrastructure Fire Mitigation in VHFHSZ:

The critical communications facilities located on Mount Lee are situated directly within this VHFHSZ. California Public Utilities Code (PUC) §8386 and §8387 impose clear mandates on electrical corporations and publicly owned utilities to prepare, submit, and implement comprehensive Wildfire Mitigation Plans (WMPs) designed to minimize the risk of their electrical lines and equipment causing catastrophic wildfires. These plans must detail protocols for de-energization during high-risk conditions (including notification to operators of telecommunications infrastructure), systematic vegetation management around infrastructure, and regular inspections of equipment.

Furthermore, CPUC General Order 95 (GO 95) establishes specific safety rules for communication facilities, including stringent requirements for vegetation clearance (Rule 35), construction standards in high fire-threat districts, timely corrective action for identified hazards (Rule 18), and mandated inspection frequencies for communication lines (Rule 80.1). The CPUC also oversees Public Safety Power Shutoffs (PSPS) as a last-resort measure and mandates the use of protective equipment with "fast trip" settings (PEDS) to rapidly de-energize lines if a fault occurs.

While these regulations place primary compliance responsibility on the utilities themselves, the City of Los Angeles—as a landowner of portions of Mount Lee , an operator of its own infrastructure, and the primary local fire authority (LAFD)—has an overarching and non-delegable duty to ensure these state-mandated safety standards are rigorously met within its jurisdiction. This duty includes ensuring that its own land management practices (e.g., brush clearance by Recreation and Parks or LAFD on City-owned parcels on Mount Lee) do not compromise utility WMPs or GO 95 requirements. Crucially, the City must also guarantee unimpeded access for utilities to conduct necessary maintenance, inspections, and emergency repairs. Any failure in this comprehensive oversight—such as allowing excessive vegetation growth near power lines or utility equipment on City land or failing to ensure clear and reliable access for utility crews due to the unmanaged traffic and parking chaos it permits—would constitute a significant governance failure. The presence of critical communications infrastructure on Mount Lee, surrounded

by parkland in a VHFHSZ, creates a complex fire risk scenario. The City's land management and access control policies (or lack thereof) directly impact on the ability of utilities to comply with their state-mandated obligations, thereby increasing wildfire risk to this vital infrastructure.

3.3 Uncontrolled Commercialization and Creation of Public Nuisance

The intense tourist interest in the Hollywood Sign and Griffith Park has led to a proliferation of commercial activities, many of which appear to operate with minimal regulatory oversight or enforcement, further contributing to the public safety crisis and creating a public nuisance.

- Non-enforcement of Regulations Against Illegal Vending:

The Los Angeles Municipal Code contains several provisions aimed at regulating vending. LAMC §42.00 generally prohibits sidewalk vending unless a permit has been obtained. LAMC §42.13 further details the Sidewalk and Park Vending Program, stipulating requirements for permits, adherence to rules regarding placement of vending apparatus, trash disposal, and operation in prohibited locations. Specifically for parks, LAMC §63.44 B.3 prohibits vending except under specific, legally defined circumstances.

Despite this regulatory framework, anecdotal evidence from resident complaints about general tourist-related chaos ¹, coupled with the common observation of unpermitted vendors in high-tourist areas citywide, suggests a pattern of lax enforcement. While not specific to Lake Hollywood, news of periodic crackdowns on illegal street vending elsewhere in the city indicates that the problem of unpermitted commercial activity is a recognized and ongoing challenge for municipal authorities. The presence of such illegal vendors contributes to pedestrian congestion, increased litter, and a general degradation of public spaces, thereby creating nuisance conditions. The City's apparent failure to consistently and effectively enforce its own vending ordinances in tourist-impacted zones like the Lake Hollywood access corridors demonstrates a tolerance for unlawful commercial activity that negatively impacts the safety, amenity, and quality of life for residents and the park environment itself.

- Non-enforcement of Regulations Against Unpermitted Commercial Tours:

As discussed in Section 3.1.3, the operation of large tour buses is now subject to LAMC §80.36.11.8 However, there is a strong likelihood that smaller, less conspicuous commercial tour operations, such as those utilizing vans or independent guides conducting walking/hiking tours, continue to operate outside these specific large-bus regulations, thereby contributing to local traffic congestion and parking shortages.

The regulatory landscape for commercial tours is fragmented across multiple agencies. The National Park Service (NPS), which has a presence in the broader Santa Monica Mountains National Recreation Area, requires Commercial Use Authorizations (CUAs) for a variety of services, including guided hikes and tours conducted on federally administered lands. Similarly, the MRCA Park Ordinance defines and restricts "commercial use" on lands it manages (which includes SMMC parkland) without appropriate permits. The City's Department of Recreation and Parks also has its own rules and processes for authorizing concessions and tours within Griffith Park, as evidenced by RFPs for exclusive tour operations.

This jurisdictional complexity can create enforcement challenges. While large tour buses are beginning to be addressed by the City, smaller operators or those conducting informal tours may evade detection or exploit regulatory ambiguities, particularly if their activities span multiple jurisdictions (e.g., starting on a City street, entering a park trail managed by Recreation and Parks, and potentially crossing onto SMMC/MRCA or even NPS land). A lack of robust, coordinated permitting and enforcement across all relevant agencies allows these unpermitted or under-regulated activities to flourish, adding to congestion, parking demand, and safety risks, while also potentially damaging sensitive natural resources.

Failure to Address Resident Complaints Regarding Noise, Congestion, and Safety Hazards:

There is a substantial and well-documented history of resident complaints and direct appeals to City authorities regarding the severe negative impacts of unmanaged tourism in the Lake Hollywood area. These complaints consistently highlight issues of debilitating traffic congestion, illegal and obstructive parking, pervasive noise, and significant safety hazards.¹ The Hollywoodland Homeowners Association has been particularly vocal, asserting that the City has "illegally and dangerously created and promoted bootlegged tourist magnets" in their residential neighborhood. They describe their main access artery as frequently dead-ended due to tourist traffic and parked cars obstructing narrow streets, preventing essential two-way movement. Public comments submitted in relation to City Council File 23-0706 (regarding parking meters at Lake Hollywood Park) further underscore this frustration, citing the lack of enforcement of existing parking restrictions and the profoundly negative impact of unmanaged tourism on residents' daily lives and safety.

This clear, documented history of persistent resident complaints and explicit warnings about dangerous conditions serves as undeniable notice to the City and other relevant entities. The sustained failure of these bodies to meaningfully address these long-standing grievances, or to implement effective and lasting solutions, points to a systemic disregard for resident safety and quality of life, often appearing to prioritize unmanaged tourism over community well-being. This prolonged inaction in the face of known, articulated hazards is a critical component in establishing governmental liability for the creation and perpetuation of a public nuisance and for failing to abate dangerous conditions.

3.4 Failure to Comply with AB 747: Evacuation Route Analysis Neglected in Violation of State Law

One of the most glaring and consequential omissions in the City of Los Angeles's planning for the Lake Hollywood area is its failure to comply with Assembly Bill 747 (2019), codified in California Government Code §65302.15. This statute requires that every city and county, upon the next revision of the safety element of its General Plan on or after January 1, 2022, must identify evacuation routes and assess their capacity, safety, and viability under a range of emergency scenarios—including wildfires, earthquakes, and other natural hazards. The bill's purpose was clear: to ensure that jurisdictions integrate meaningful evacuation analysis into land use planning, particularly in high-risk areas like Very High Fire Hazard Severity Zones (VHFHSZs).

The City of Los Angeles has not published an AB 747-compliant evacuation analysis for the Lake Hollywood area or any other high-risk zone within its borders, despite being legally obligated to do so. The city's General Plan Safety Element was last updated in October 2021, just months before the AB 747 compliance deadline. While the update makes passing reference to evacuation in vague terms, it fails to conduct or include any rigorous analysis of route capacity, choke points, traffic modeling, pedestrian evacuation issues, or risk prioritization based on realistic scenarios like concurrent firestorms and gridlock. Critically, the Safety Element does not identify specific evacuation routes for high-risk hillside neighborhoods, including Lake Hollywood, nor does it analyze their viability under pressure—despite extensive historical knowledge of the area's one-way roads, blocked fire lanes, and traffic congestion.

This omission is particularly egregious given that the Lake Hollywood area is both a residential enclave and a tourist magnet located entirely within a VHFHSZ, with narrow roads, limited ingress and egress points, and known issues with illegal parking and emergency access. The legal mandate under AB 747 exists precisely to address such scenarios. That the City failed to meet this requirement in one of its most vulnerable areas highlights an extraordinary lapse in compliance and planning. Worse still, residents have warned for years that evacuation in an emergency would be nearly impossible, citing past fire events and obstructed access routes. Yet the City has taken no meaningful action to rectify or even assess the problem through the lens of its legal obligations under AB 747.

This failure is not a mere technical oversight—it is a violation of state law and a dereliction of the City's statutory duty to protect its residents and critical infrastructure. Under California Government Code §815.6, a public entity is liable for injuries caused by its failure to discharge a mandatory duty imposed by statute, where the duty was intended to protect against the kind of risk that materialized. Should a wildfire or mass emergency occur and result in blocked evacuations

and preventable harm, the City's noncompliance with AB 747 would constitute compelling evidence of liability under this provision.

In summary, the City of Los Angeles's failure to conduct the evacuation route analysis mandated by AB 747 represents both a legal violation and a profound public safety failure. In the context of the Lake Hollywood area's well-documented vulnerabilities, this omission compounds the already perilous conditions and further exposes both residents and critical infrastructure—such as the Mount Lee Communications Hub—to potentially catastrophic outcomes.

3.5 City Sanctioning of Party Houses: Erosion of Zoning and Public Nuisance Enforcement

The Hollywood Hills has become a focal point for illegal party house activity, where residential properties are repeatedly used as unlicensed commercial event venues. This conduct persists despite years of resident complaints, police responses, and the existence of multiple municipal ordinances designed to prohibit exactly these kinds of intrusions into low-density neighborhoods. The City of Los Angeles, through its failure to enforce its own zoning restrictions, noise regulations, and short-term rental laws, has effectively sanctioned this unlawful use. This abdication of responsibility represents yet another dimension of the City's broader failure to enforce public safety laws in the Hollywood Hills and adjacent Very High Fire Hazard Severity Zones.

Much like the traffic, fire, and commercial activity issues described in earlier sections, the party house crisis is not a matter of isolated infractions—it is the result of chronic, large-scale non-enforcement. While the City adopted specific ordinances, including the 2018 "Party House Ordinance" (LAMC §41.58.1), the 2019 Home-Sharing Ordinance (LAMC §12.22 A.32), and existing zoning rules that bar commercial activity in residential zones, enforcement has remained overwhelmingly reactive and ineffective. Even high-profile instances involving violence, utility shutoffs, or media attention have failed to prompt systemic regulatory change or consistent compliance.

As with other systemic failures in the Lake Hollywood area, this ongoing problem has implications far beyond noise. The repeated use of homes as commercial venues results in increased traffic, frequent late-night disturbances, unpermitted alcohol service, and obstructed streets—all within an area designated for evacuation risk during fire conditions. The persistent inaction of the City not only constitutes a breakdown in code enforcement but also establishes a foreseeable and dangerous condition of public property.

Documented Violations and Legal Framework

Numerous legal frameworks prohibit party house activity in the Hollywood Hills. These include:

- LAMC §41.58.1 ("Party House Ordinance"), enacted under Ordinance No. 185,451 (effective April 15, 2018), which defines and penalizes "loud or unruly gatherings" with escalating fines and mandatory signage for repeat offenses.
- LAMC §115.02, which prohibits the use of amplified sound without a permit in residential zones.
- LAMC §12.22 A.32 ("Home-Sharing Ordinance"), enacted under Ordinance No. 185,931 (effective July 1, 2019), which limits short-term rentals to a host's primary residence, requires registration, prohibits commercial events, and sets caps on rental nights.
- Zoning Code restrictions for R1 and R2 zones, which prohibit commercial use, including event hosting or leasing for unpermitted business activity.
- California Penal Code (Public Nuisance) and common law nuisance doctrine, which prohibit property use that interferes with the safety, comfort, or quiet enjoyment of others.

Despite these laws, the City has allowed certain properties to operate repeatedly as event venues. These homes are often listed on short-term rental platforms, advertised for parties, and host large gatherings involving hundreds of attendees, valet parking, alcohol service, and amplified music. City Attorney records, LAPD statements, and media

reports confirm a long-standing pattern of illegal use, warnings, and sporadic citations—followed by little or no sustained enforcement action.

Failure to Enforce and Systemic Implications

While the City's ordinances provide adequate legal authority, implementation is sorely lacking. The "Party House Ordinance" provides escalating fines and requires signage posted on-site after multiple violations. Yet residents report that enforcement is often limited to an initial LAPD visit, with no follow-up. Even in high-profile cases where utilities were shut off during the COVID-19 emergency, properties returned to operation within weeks or months. Public records show that very few short-term rental registrations have been revoked, despite clear and repeated violations.

Airbnb itself removed 28 listings in the Hollywood Hills in January 2020 at LAPD's request, citing repeated disturbances. The City did not initiate these removals—it relied on the platform to police itself. The enforcement gap is further demonstrated by ongoing resident complaints and the continued appearance of party rentals on short-term rental sites.

These enforcement failures mirror the City's broader approach in the Lake Hollywood area—adopting formal policies, acknowledging problems, and then allowing them to persist without consistent monitoring or corrective action. In the context of narrow hillside streets and fire-prone terrain, these repeated violations pose substantial risks not just to quality of life, but to emergency response, public order, and evacuation safety.

The following table provides a consolidated overview of key mandatory codes and the nature of their non-enforcement in the Lake Hollywood area:

Table 1: Matrix of Unenforced/Violated Mandatory Codes in the Lake Hollywood Area

Specific Code, Ordinance	Mandatory Requirement	Nature of Non-Enforcement/Violation in Lake Hollywood Area	Primarily Responsible Entity(ies)
AB 747 codified in California Government Code §65302.15	Every city and county, upon the next revision of the safety element of its General Plan on or after January 1, 2022, must identify evacuation routes and assess their capacity, safety, and viability under a range of emergency scenarios—including wildfires, earthquakes, and other natural hazards.	The City has failed to provide the required evacuation plan – a fact that was documented in the Palisades by bulldozed cars blocking emergency vehicles.	City of Los Angeles
LAMC §86.02	No driving over 25 mph in parks; no driving over 10 mph in park parking areas.	Widespread speeding on park access roads and within/near Lake Hollywood Park.	LADOT, LAPD, RAP
California Fire Code §503; LAMC Fire Code (Brush/Access)	Fire apparatus access roads (fire lanes) must be unobstructed (min. 20 ft width). Red curbs/signage required.	Chronic obstruction of narrow hillside streets and designated/potential fire lanes by illegally parked tourist vehicles.	LAFD, LADOT, LAPD
LAMC §86.03	RAP authorized to post and	Insufficient restrictions or lack of	RAP, LADOT,

	enforce parking limitations/prohibitions in parks.	enforcement leading to hazardous parking, congestion at Lake Hollywood Park and approach roads.	LAPD
LAMC §80.36.11 (Tour Bus Ordinance)	Tour buses restricted from operating/stopping/parking on designated unsafe streets.	Continued operation of tour buses in restricted or unsafe manners; insufficient enforcement; slow expansion of restrictions to all affected areas.	LADOT, LAPD
LAMC §57.4906.5.2; PRC §4291	Mandatory brush clearance (200 ft from structures, 10 ft from roadways) in VHFHSZ.	Concerns about inadequate brush clearance in a VHFHSZ, contributing to fire risk.	LAFD, Property Owners
LAMC §63.44 B.3; LAMC §42.13	Vending in parks and on sidewalks requires permits and adherence to placement/operational rules.	Presence of unpermitted/unregulated vendors contributing to congestion and nuisance.	RAP, Bureau of Street Services, LAPD
LAMC §86.06; LAMC §63.44 (Vehicle Use in Parks)	Vehicles (incl. bicycles) prohibited on park trails unless posted for such use. Driving prohibited unless posted for parking.	Potential for unauthorized vehicle use on trails or unposted areas due to overall lack of enforcement presence.	RAP, LAPD
Gov. Code §835	Public entity duty to protect against dangerous conditions on its property when it has notice.	Creation/maintenance of multiple dangerous conditions (traffic, parking, fire access) despite extensive notice from studies and resident complaints.	City of Los Angeles (all depts.)
CPUC General Order 95; PUC §8386, §8387	Utilities must maintain infrastructure safely (vegetation, inspections, WMPs) in HFTDs.	Potential for compromised utility safety due to City's failure to ensure access for maintenance or manage vegetation on City land near infrastructure.	City of LA (as landowner/o verseer), CPUC

4. Breach of Duty: The Culpability of Responsible Entities

The persistent public safety crisis in the Lake Hollywood area is not merely a series of unfortunate events but a direct outcome of breached duties by the entities responsible for governance, safety, and land management. This section examines the specific responsibilities of the City of Los Angeles, the Santa Monica Mountains Conservancy (SMMC)/Mountains Recreation and Conservation Authority (MRCA), and the Hollywood Sign Trust.

4.1 The City of Los Angeles

The City of Los Angeles, through its various departments and its legislative body, has been extensively and repeatedly put on notice regarding the escalating dangers in the Lake Hollywood area. Despite this awareness, its actions have been largely insufficient, poorly implemented, or inadequately enforced, constituting a significant breach of its duty of care to residents and the public.

- **Documented Awareness vs. Inaction/Ineffective Action:**

- **Los Angeles Department of Transportation (LADOT):** LADOT's awareness of traffic-related hazards is undeniable. The department has commissioned and received numerous studies, including the 2018 Dixon Study which specifically addressed access and mobility around Griffith Park and recommended traffic calming measures for areas like Canyon Lake Drive. The City's overarching "Vision Zero" initiative, managed by LADOT, aims to eliminate traffic fatalities, yet the department's own 2024 Safety Study reported a 13% increase in Killed and Severely Injured (KSI) collisions between 2017 and 2021. This same study conceded "limited time...to perform in-depth 'hot spot' evaluations at all locations," a significant admission given the years of intense complaints emanating from the Lake Hollywood "hot spot." While LADOT operates the DASH bus service to Griffith Observatory and has been involved in developing tour bus regulations ⁸, the persistence and, in some cases, worsening of traffic congestion, speeding, and illegal parking in Lake Hollywood demonstrate that these measures have not been effective in mitigating the core problems. City Council File 23-0706, active into 2024, shows LADOT still studying parking issues in Lake Hollywood ⁵, years after the problems reached crisis levels, underscoring a pattern of delayed and inadequate response.
- **Los Angeles Fire Department (LAFD):** The LAFD is acutely aware of the fire risks. The designation of the area as a VHFHSZ, the implementation of annual brush clearance programs, and the establishment of Red Flag parking restrictions all serve as evidence of this awareness. However, the continued obstruction of fire lanes by illegally parked vehicles ⁴ and ongoing community concerns about the adequacy of brush clearance in difficult terrain ⁴ suggest significant gaps in the effectiveness or enforcement of these critical fire safety programs.
- **Department of Recreation and Parks (RAP):** RAP is responsible for managing Griffith Park, including many of the areas and trails accessed via or impacting the Lake Hollywood community. RAP establishes and is meant to enforce rules regarding park hours, prohibitions on open fires, requirements for leashed dogs, restrictions on bicycle use on trails, and adherence to speed limits within park boundaries. The department also plays a role in regulating commercial activities, as seen in its Request for Proposals for exclusive park tours. A critical failure in holistic park management was evident in the City's handling of the Hollyridge Trail access closure; this decision, in which RAP was undoubtedly involved, displaced significant tourist traffic to other areas without adequate planning or mitigation for the resultant impacts. RAP's authority to post and enforce parking restrictions (LAMC §86.03) and to designate trail usage (LAMC §86.04) implies a clear duty to manage public access and its consequences, a duty that appears largely unfulfilled in the context of Lake Hollywood.
- **Los Angeles City Council:** The legislative arm of the City has a long and detailed record of acknowledging the problems in the Hollywood Hills and Lake Hollywood area through numerous Council Files. Examples include CF 14-1723 (related to various community and infrastructure matters) ; CF 17-0011-S5 (oil well issues but indicative of hillside development concerns) ; CF 17-0438 and its supplements (tourism impacts, enforcement, and safety) ; CF 18-1085 (funding for telecommunications infrastructure on Mt. Lee, highlighting its importance yet failing to ensure its secure environment) ; CF 23-0706 (Lake Hollywood Park parking issues) ; and CF 17-1115 with its

supplement S1 (tour bus regulations). These files document years of departmental reports, proposed (often unimplemented or ineffective) solutions, funding debates, and extensive community input. The sheer volume of these actions, contrasted with the lack of tangible, sustainable improvements to public safety in the affected areas, points to a systemic failure of legislative oversight, a lack of political will to implement difficult but necessary solutions, insufficient resource allocation, or a combination thereof. Public comments within CF 23-0706, for instance, directly criticize Council actions as inadequate and devoid of proper community impact assessment.

The City of Los Angeles, through the collective actions and inactions of its various departments and its City Council, has been on actual notice of the escalating public safety crisis in the Lake Hollywood area for many years. The extensive paper trail of studies, council files, departmental reports, and persistent, detailed resident complaints, when contrasted with the limited tangible and sustainable improvements in traffic management, parking enforcement, and fire safety, points to a systemic breach of the City's fundamental duty of care. This is not a pattern of isolated or minor instances of negligence but rather a consistent and prolonged failure to act effectively in the face of known and foreseeable dangers. The City's responses often appear to be more performative—commissioning studies, passing motions that lead to little substantive change—than genuinely effective in mitigating the well-documented risks. This pattern of "action without effect" or "awareness without adequate remedy" underscores the City's responsibility to ensure public safety and to maintain its property, including streets and park access points, in safe and functional condition. Such a pattern suggests a level of deliberate indifference or, at minimum, gross negligence that has allowed the hazardous conditions in Lake Hollywood to fester and grow.

4.2 The Santa Monica Mountains Conservancy (SMMC) / Mountains Recreation and Conservation Authority (MRCA)

The SMMC, and its operating arm, the MRCA, manage significant public lands within the Santa Monica Mountains Zone, a territory that includes or abuts areas critical to accessing Griffith Park and the Hollywood Sign. California Public Resources Code §33211.5 grants the SMMC/MRCA explicit authority to establish conditions of use for its properties, including the power to close areas for safety reasons (such as fire, mudslide, or landslide dangers) and to post rules and restrictions for trails, campsites, and other public use areas. The MRCA Park Ordinance further details regulations concerning commercial use and other activities on these lands.

While the SMMC/MRCA has clear authority over its own lands, its primary failure in the context of the Lake Hollywood crisis appears to be one of insufficient coordination with the City of Los Angeles and a lack of proactive mitigation of the impacts its access policies have on adjacent communities. The interconnectedness of the regional trail systems and the immense draw of tourist destinations like the Hollywood Sign mean that SMMC/MRCA's decisions—or lack of coordinated action—can directly influence visitor flow and concentrate pressure on City-managed streets and neighborhoods that are ill-equipped to handle such burdens. For example, if an SMMC/MRCA-managed trail becomes a popular alternative route to the Hollywood Sign (perhaps due to closures or congestion elsewhere), and the access points to this trail run through sensitive residential areas under City jurisdiction without adequate infrastructure or traffic management, the SMMC/MRCA's access policies contribute directly to the safety problems in those City areas.

The SMMC/MRCA is responsible for enforcing its own park rules, including those pertaining to unpermitted commercial tours, illegal parking on its property, and environmental protection. Any laxity in enforcing these rules on SMMC/MRCA land, particularly if it leads to spillover effects such as tourists parking illegally on City streets to access SMMC trails, constitutes a contributing factor to the broader crisis. The MRCA's issuance of park closure orders during emergencies, as documented, demonstrates its capacity and authority to act decisively for public safety. A failure to apply similar proactive management and inter-agency coordination to the chronic, foreseeable safety issues stemming from unmanaged tourism represents a breach of its broader public trust responsibilities. The SMMC/MRCA has a duty to manage its lands not in isolation, but with due consideration for the external impacts of its access and usage policies on adjacent jurisdictions and communities.

4.3 The Hollywood Sign Trust

The Hollywood Sign Trust's mission is to repair, maintain, refurbish, and provide capital improvements to the Hollywood Sign for the benefit of the public, and to educate the world about this global icon. As part of this mission, the Trust operates the official Hollywood Sign website, which includes detailed hiking information and directions for various trails leading to views of the Sign.

While the Trust is a non-profit entity without direct governmental enforcement powers, its promotional activities play a significant role in driving visitor traffic to the Sign and its surrounding areas. By actively providing trail information and encouraging public access, the Trust contributes to the visitor influx that strains local infrastructure and public safety resources. The Trust's mission also includes "physically maintaining, repairing and *securing* the Hollywood Sign" and "providing capital improvements for the *benefit of the public*". A comprehensive interpretation of this mission should extend beyond the mere physical preservation of the Sign structure to encompass the safety and well-being of the public seeking to experience it and the communities impacted by this tourism.

The Trust has invested in security and surveillance systems for the Sign itself, demonstrating a commitment to protecting the physical landmark. However, if this focus on the Sign's immediate security is not matched by a corresponding effort to advocate for, or contribute towards, safety and infrastructure improvements in the impacted access corridors and residential neighborhoods like Lake Hollywood, the Trust could be viewed as inadvertently exacerbating the public safety crisis. There appears to be a potential misalignment between promoting the Hollywood Sign as a global tourist destination and actively working to mitigate the significant local negative impacts that this very promotion generates. The Trust, as a key stakeholder and the primary entity dedicated to the Sign, has a moral responsibility, and potentially an indirect legal one if its actions are found to contribute to a foreseeable risk, to work collaboratively with governmental agencies and financially support comprehensive solutions to the safety crisis its iconic asset fuels. Its current efforts may be too narrowly focused on the physical integrity of the Sign, neglecting the broader "public benefit" aspect of its mission as it relates to the safety and quality of life of the surrounding communities.

5. Compounding Threats: Endangerment of Community and Critical Infrastructure

The systemic non-enforcement of mandatory codes and the abdication of responsibilities by the governing entities have not merely resulted in isolated inconveniences; they have created a matrix of compounding

threats that directly endanger the Lake Hollywood community and jeopardize critical public infrastructure vital to the broader Los Angeles region.

5.1 Direct Threats to Residents and Public Safety

The daily conditions in and around Lake Hollywood pose clear and present dangers to those who live there and those who visit:

- **Increased Risk of Accidents:** The combination of high traffic volumes, excessive speeding, pervasive illegal parking (often obstructing sightlines and narrowing already substandard roads), and frequent pedestrian-vehicle conflicts create an environment ripe for traffic accidents. The city-wide 13% increase in KSI collisions between 2017 and 2021 provides a grim statistical backdrop to the hazardous conditions observed locally.
- **Impeded Emergency Response:** This is the most acute threat. Blocked fire lanes, gridlocked streets due to tourist traffic, and vehicles parked illegally on both sides of narrow, winding roads can critically delay the arrival of fire trucks, ambulances, and police vehicles in life-or-death situations. This danger is magnified exponentially by the area's designation as a VHFHSZ. The Hollywoodland Homeowners Association has chillingly referenced a past fatality where fire response was hindered by such conditions. News reports from other hillside areas, such as the Franklin Fire in Malibu which involved significant road closures and evacuation challenges, serve as stark reminders of the potential consequences when emergency access is compromised.
- **Diminished Quality of Life & Public Nuisance:** Beyond the immediate physical dangers, the unmanaged situation has led to a severe degradation of the quality of life for Lake Hollywood residents. Constant noise from traffic and tourists, chronic congestion making simple errands an ordeal, the inability to reliably access their own homes due to blocked driveways or streets, increased litter, and pervasive safety fears collectively constitute a significant public nuisance. This ongoing assault on the community's peace and enjoyment of their property is a direct result of the failure to manage tourism and enforce existing laws.
- **Legal Principle: "Dangerous Condition of Public Property" (California Government Code §835):** The cumulative effect of these unaddressed hazards—the traffic chaos, the parking anarchy, the compromised emergency access, the fire risks—unequivocally creates a "dangerous condition of public property." Under California Government Code §835, a public entity is liable for injury caused by such a condition if it can be established that the property was in a dangerous condition at the time of the injury, the injury was proximately caused by the dangerous condition, the condition created a reasonably foreseeable risk of the kind of injury incurred, and the public entity had actual or constructive notice of the dangerous condition a sufficient time prior to the injury to have taken measures to protect against it. The extensive documentation in the form of City Council Files, departmental studies, persistent resident complaints, and media reports overwhelmingly establishes such notice. The "dangerous condition" in Lake Hollywood is not a singular defect, like a pothole, but rather the *entire hazardous environment* cultivated by years of systemic neglect and non-enforcement.

The threats faced by the Lake Hollywood community are not isolated or sporadic incidents but represent a chronic, pervasive state of endangerment. The consistent failure of the City of Los Angeles and other responsible entities to manage the impacts of tourism and to enforce fundamental public safety codes has effectively transformed residential neighborhoods into hazardous zones. This perilous situation is a direct and foreseeable consequence of the governance failures detailed throughout this report.

5.2 Vulnerability of Critical Infrastructure

The governance failures extend beyond the immediate residential areas, posing a significant threat to critical infrastructure, most notably the vital communications hub on Mount Lee and the network of roadways essential for emergency evacuation and access.

- **The Mt. Lee Communications Hub:**

- **Criticality and Function:** The Mount Lee Communications Center is a "multi-purpose critical communications complex" that functions as the "nerve center for City of LA critical operations". It serves a wide array of essential City agencies, including police department dispatch centers, the fire department, Metro and Valley 911 services, and City IT departments, and extends support to federal agencies such as the FBI and Homeland Security. The facility's design incorporates "robust redundant infrastructure systems" to ensure operational continuity. Historically, Mount Lee was a key site in the development of broadcast television, with Don Lee establishing a pioneering broadcast studio and transmission tower there in the late 1930s. The City of Los Angeles's Critical Infrastructure Annex explicitly defines "Information Technology & Communications," including City-operated public safety radio systems, as critical infrastructure, noting that failure in one critical infrastructure can cause a domino effect. California Government Code §8592.30(a) further defines "Critical infrastructure controls" as networks and systems so vital that their destruction would have a debilitating impact on public health and safety. Presidential Policy Directive 21 (PPD-21) also identifies the "Communications Sector" and "Information Technology Sector" as critical.
- **Key Risks to Mount Lee:** The facility faces inherent risks due to its location and function:
 - **Fire:** Situated atop Mount Lee within Griffith Park, a large urban wilderness, it is highly exposed to wildfire risk. This risk is extensively addressed by regulations including utility Wildfire Mitigation Plans (PUC §8386, §8387), on-site fuel management (PRC §4291, LAMC VHFHSZ rules), and fire-resistant building codes (Title 24).
 - **Public Access:** Proximity to public trails in a major recreational area creates vulnerabilities to accidental damage, vandalism, or intentional interference. This is managed primarily through general park rules (LAMC §63.44, §86.04) and closure authorities (RAP, LAMC § 41.18).
 - **Traffic:** Congestion in Griffith Park, particularly near attractions like the Griffith Observatory, can impede routine maintenance and, more critically, emergency responder access to Mount Lee. This operational risk is addressed by LAMC park traffic rules and broader City traffic management efforts.

- **Fire Risk Exacerbation:** The Mount Lee communications facility is situated directly within a Very High Fire Hazard Severity Zone (VHFHSZ), rendering it exceptionally vulnerable to wildfire. Any deficiencies in enforcing brush clearance mandates (LAMC §57.21.07 history, PRC §4291) on surrounding public and private lands ⁴, failures in maintaining clear fire roads and access for firefighting equipment, or inadequate oversight of utility Wildfire Mitigation Plans (as required by PUC §8386, §8387 and CPUC General Order 95) directly endanger this indispensable hub. The City of Los Angeles itself leases space on Mount Lee for communications purposes, thereby incurring direct landlord responsibilities for ensuring a safe operational environment. City Council File 18-1085, which concerned funding for the installation of fiber optic lines on Mount Lee, underscores the ongoing investment in and reliance on this critical site, making its protection even more paramount.
- **Access Obstruction:** The same traffic gridlock and illegal parking that plague residents on the access roads leading towards the Hollywood Sign and Griffith Park also affect routes to Mount Lee. These roads are often shared or interconnected. Such obstructions can severely impede access for essential maintenance personnel, fuel deliveries for backup generators (critical during power outages or PSPS events), and, most importantly, emergency responders in the event of a fire or security incident at the communications facility. This directly mirrors the broader concerns about obstructed emergency access throughout the Hollywood Hills.
- **Security & Mitigation Non-Enforcement:** While physical security standards for communication facilities are outlined in codes such as the California Building Code (Title 24) and CPUC regulations pertaining to utility infrastructure hardening and safety , their consistent and effective enforcement in an environment characterized by chaotic, unmanaged tourist influx may be compromised. The City's own definition of critical infrastructure acknowledges its vulnerability to intentional man-made disruptions, including cyber-attacks, a risk that is undoubtedly heightened when access control and general order are lacking. Potential gaps also exist in regulations ensuring dedicated power resilience for such critical facilities during widespread emergencies, as utility WMPs may not sufficiently mandate specific measures beyond notification for critical telecommunications infrastructure. Similarly, explicit, detailed state or local regulations governing the physical security of critical telecommunications infrastructure located *within* public recreational areas like Griffith Park are not apparent, relying more on general rules or discretionary assessments.

The public safety crisis in Lake Hollywood and the surrounding Hollywood Hills is therefore not merely a localized neighborhood issue; it directly threatens city-wide and even regional emergency response capabilities by jeopardizing the operational integrity and physical security of the Mount Lee communications hub. The very same governance failures—particularly the non-enforcement of fire codes and the inability to manage traffic and ensure clear access—that endanger residents also place this critical public asset at profound risk. This represents a severe failure of governance, as the City is effectively undermining its own capacity to provide essential emergency services to its entire populace by failing to secure this critical site from foreseeable hazards.

- **Roadways as Critical Evacuation and Emergency Access Routes:** The City of Los Angeles officially defines its roadways and bridges as critical infrastructure. The Department of Public Works, Bureau of

Street Services, is tasked with the responsibility of ensuring that City streets remain accessible and passable, especially during emergencies and crisis situations, to facilitate the movement of public safety first responders and personnel.

The inherent geography of the Hollywood Hills, characterized by narrow, winding, and often dead-end streets, presents intrinsic challenges for large-scale evacuations and rapid emergency vehicle access. When these already constrained roadways are further compromised by tourist-induced gridlock, illegal parking, and obstructions ¹, they cease to function as viable emergency routes. This situation directly contravenes the fundamental purpose of designated fire lanes (mandated by California Fire Code §503.48) and undermines the objectives of the City's own Red Flag parking restriction program, which is specifically designed to keep such routes clear during periods of high fire danger. The non-enforcement of basic traffic and parking codes effectively transforms this critical roadway infrastructure into a dangerous liability during an emergency, directly violating the City's duty to maintain its public property in a safe condition for public use, most critically for resident evacuation and first responder access. This is a clear manifestation of a "dangerous condition of public property" that the City has allowed to develop and persist despite overwhelming notice of the attendant risks.

The following table summarizes the key vulnerabilities of critical infrastructure in the Lake Hollywood area due to the identified governance failures:

Table 2: Critical Infrastructure Vulnerabilities in the Lake Hollywood Area

Critical Infrastructure Asset	Specific Threats	Responsible Governing Body(ies)	Mandatory Codes/Regulations Not Enforced or Inadequately Implemented
Mt. Lee Communications Center	Wildfire exposure due to inadequate brush clearance on adjacent lands; Impeded access for maintenance/emergency personnel due to traffic/parking; Compromised power resilience.	City of LA (LAFD, RAP, LADWP, ITA); Utilities; SMMC (for adjacent lands)	LAMC Fire Code (brush clearance, access); PUC §8386/§8387 (WMPs); CPUC GO 95 (vegetation/comms lines); LAMC Traffic/Parking Codes; Gov Code §8592.30.
Emergency Evacuation Routes / Fire Lanes (e.g., Canyon Lake Dr., Mulholland Hwy, local residential streets)	Complete blockage or severe congestion due to tourist traffic and illegal parking, preventing resident evacuation and emergency vehicle ingress/egress.	City of LA (LADOT, LAPD, LAFD)	CFC §503 (Fire Lanes); LAMC Traffic/Parking Codes (Div R, §86.03, Red Flag Parking §86.08); Gov. Code §835 (Dangerous Condition).
Public Park Access Points & Trails (as related	Overcrowding and uncontrolled access leading to inability to manage emergency situations (e.g.,	City of LA (RAP); SMMC/MRCA	LAMC Park Rules (§63.44); PRC §33211.5 (SMMC closures/rules); General duty to

to emergency operations)	evacuations from park, access for SAR).		manage public lands safely.
Utility Infrastructure (Power/Water lines serving the area and Mt. Lee)	Damage from wildfire due to inadequate vegetation management; Delayed repairs due to access issues.	Utilities; City of LA (oversight, access assurance); CPUC	PUC §8386/§8387 (WMPs); CPUC GO 95 (vegetation management, line safety); City responsibility to ensure utility access and safety on city-controlled property.

7. Statutes, Ordinances, and Precedents

The public safety crisis in the Lake Hollywood area, stemming from systemic non-enforcement and governance failures, implicates a range of legal mandates at the municipal, state, and even federal guideline level. These legal imperatives establish clear duties of care and operational standards, the violation of which forms the basis for potential legal claims against the responsible entities.

Analysis of Relevant LAMC, California State Codes, and Federal Guidelines

- **Los Angeles Municipal Code (LAMC):** A cornerstone of the City's responsibilities lies within its own Municipal Code. Key violated ordinances include:
 - **Traffic and Parking:** Division "R" Traffic Regulations in Parks , particularly LAMC §86.02 (Speed of Vehicles in Parks), §86.03 (Standing or Parking of Vehicles - In Park), §86.04 (Bicycles in Parks, Etc. – restricting vehicles/bicycles on trails), and §86.06 (Posting of Signs - Driving and Parking Prohibited – on paths/trails unless posted). The Red Flag Day Parking ordinance (LAMC §86.08) and general street parking regulations, including those discussed in Council File 23-0706 for Lake Hollywood Park ⁵, are routinely flouted. The Tour Bus Ordinance (LAMC §80.36.11) also suffers from enforcement challenges.
 - **Fire Safety:** Article 7 of the LAMC (Fire Code) incorporates state fire law and adds specific City amendments. Critical among these are the requirements for Very High Fire Hazard Severity Zones (VHFHSZ) (including LAMC §57.21.07 history regarding 200-foot vegetation clearance and LAMC §91.7207 for fire-resistant construction) and mandatory brush clearance (LAMC §57.4906.5.2).
 - **Park Use:** LAMC §63.44 outlines general rules for conduct in City parks, including prohibitions on activities that endanger public safety or damage park property. Vending in parks is specifically restricted by LAMC §63.44 B.3.
 - **Sidewalk Vending:** LAMC §42.00 and §42.13 govern sidewalk vending, requiring permits and adherence to numerous operational rules.
 - **Building Codes in VHFHSZ:** LAMC Chapter IX, Article 1, Division 72, specifically §91.7207, details special construction requirements for buildings within the VHFHSZ to mitigate fire risk.

- **California State Codes:** State law imposes significant duties on public entities and utilities:
 - **Public Utilities Code (PUC):** Sections 8386 and 8387 are paramount, mandating that electrical corporations and local publicly owned electric utilities develop and implement comprehensive Wildfire Mitigation Plans (WMPs) to minimize the risk of their infrastructure causing catastrophic wildfires. These plans must address vegetation management, infrastructure hardening, inspections, and de-energization protocols, including notification to telecommunications infrastructure operators. The California Public Utilities Commission (CPUC) enforces these through General Orders, such as GO 95 (detailing safety standards for overhead utility construction, maintenance, and vegetation clearance, particularly in High Fire-Threat Districts) and GO 166 (inspection cycle requirements).
 - **Public Resources Code (PRC):** Division 23 (§33000 et seq.) establishes the Santa Monica Mountains Conservancy (SMMC), defining its zone, powers, and duties related to land acquisition, preservation, and public access. PRC §33211.5 specifically empowers the SMMC (and by extension, the MRCA) to set conditions of use for its properties, including trail management and implementing safety closures. State fire law, PRC §4291, mandates defensible space requirements around buildings in state responsibility areas and VHFHSZs. PRC §33001 declares the SMMC zone a unique resource to be held in trust. PRC §33002 relates to resolving conflicting interjurisdictional values.
 - **Government Code:** This code is critical for establishing liability. **Government Code §835** makes a public entity liable for injury caused by a "dangerous condition of its property" if the plaintiff establishes that the property was in a dangerous condition at the time of the injury, the injury was proximately caused by the dangerous condition, the dangerous condition created a reasonably foreseeable risk of the kind of injury incurred, and either: (a) a negligent or wrongful act or omission of an employee of the public entity within the scope of employment created the condition, or (b) the public entity had actual or constructive notice of the dangerous condition a sufficient time prior to the injury to have taken measures to protect against it. **Government Code §815.6** establishes liability for a public entity's failure to discharge a mandatory duty imposed by an enactment designed to protect against the risk of a particular kind of injury. Furthermore, **Government Code §8592.30** defines "critical infrastructure controls" and "critical infrastructure information," underscoring the state-level recognition of the importance of protecting such assets.
 - **California Vehicle Code (CVC) & California Fire Code (CFC):** The CVC is enforced by LAPD and LADOT for all traffic and parking violations on public streets. The CFC, as adopted and amended by the City and County, includes critical provisions such as **CFC §503**, which mandate that fire apparatus access roads (fire lanes) be established and maintained unobstructed.
- **Federal Guidelines (Department of Homeland Security - DHS):** While not directly imposing enforceable duties on local government in this specific context of tort liability, federal guidelines such as the National Strategy for the Physical Protection of Critical Infrastructures and Key Assets and the Cybersecurity and Infrastructure Security Agency's (CISA) identification of 16 critical infrastructure sectors establish a national standard of care and highlight the recognized importance of protecting assets like the Mt. Lee communications hub. These can inform a court's understanding of the foreseeability and gravity of risks.

Discussion of "Dangerous Condition of Public Property" (Gov. Code §835)

The concept of 'dangerous condition of public property' under California law illustrates the seriousness of the situation and the importance of enforcement and safety measures of the City of Los Angeles. The elements required to establish liability under this statute appear to be met by the circumstances in the Lake Hollywood area:

1. **A Dangerous Condition:** This is defined as "a condition of property that creates a substantial (as distinguished from a minor, trivial or insignificant) risk of injury when such property...is used with due care in a manner in which it is reasonably foreseeable that it will be used". The cumulative impact of chronic traffic gridlock on narrow streets, rampant illegal parking obstructing access and fire lanes, uncontrolled speeding, inadequate pedestrian facilities amidst high tourist foot traffic, and heightened fire risk due to potential lapses in brush clearance and compromised emergency response collectively constitute a substantial, not trivial, risk of injury. This is not merely one defect but an entire hazardous environment.
2. **Proximate Cause:** The dangerous conditions (e.g., blocked fire lane, inability for ambulance to pass due to gridlock) must be a substantial factor in causing an injury. Given the conditions, foreseeable injuries include traffic collisions, pedestrian injuries, harm due to delayed emergency medical response, or catastrophic losses in a wildfire due to impeded firefighting efforts or evacuation.
3. **Foreseeable Risk of Injury:** The type of injuries described above are reasonably foreseeable consequences of the hazardous conditions allowed to persist.
4. **Creation by Negligent Act/Omission OR Notice:**
 - **Negligent Creation:** The City's failure to plan for and manage tourism impacts, its inadequate infrastructure, and its systemic non-enforcement of safety codes can be argued as negligent acts and omissions that *created* the dangerous condition.
 - **Actual or Constructive Notice:** Overwhelming evidence demonstrates the City had both actual and constructive notice. Actual notice is evidenced by years of direct resident complaints ¹, official City Council Files discussing the problems [multiple CFs cited], internal departmental reports and studies (e.g., Dixon Study ⁶, LADOT Vision Zero reports), and past litigation (e.g., Friends of Griffith Park). Constructive notice arises because the conditions have been so obvious, pervasive, and long-standing that the City, in the exercise of due care, should have discovered them.
5. **Failure to Take Protective Measures:** Despite this extensive notice, the City has failed to implement adequate or effective protective measures to resolve the dangerous conditions. Piecemeal efforts, unenforced regulations, and delayed actions do not meet the statutory obligation to protect the public.

Review of Relevant Council Files and their Implications

The numerous Los Angeles City Council Files pertaining to traffic, tourism, safety, and infrastructure in the Hollywood Hills, Griffith Park, and Lake Hollywood areas (e.g., CF 14-1723, CF 17-0438 and its supplements , CF 18-1085 , CF 23-0706 , CF 17-1115 and S1) are critical. These official records serve as incontrovertible

evidence of the City Council's—and by extension, the City's—*actual notice* of the multifaceted problems plaguing these communities. These files chronicle departmental reports outlining hazards, community impact statements detailing resident suffering and safety fears, proposed (and often deferred or inadequately implemented) solutions, and discussions about funding and resource allocation spanning many years.

The critical legal implication of these Council Files is not just that they demonstrate awareness, but that they highlight a pattern of *failure to effectively act* upon the information and recommendations contained within them. The initiation of studies that yield few tangible results, the passage of motions that direct departments to report back without ensuring subsequent corrective action, or the implementation of under-resourced and piecemeal solutions that fail to address the systemic nature of the crisis, all strengthen the case for sustained negligence and a breach of mandatory duties under Government Code §815.6. For example, the ongoing parking and traffic issues detailed in public comments for CF 23-0706, despite years of prior Council attention to Hollywood Sign tourism impacts, illustrate the intractability of the problem under the City's current approach to governance. This documented history of awareness coupled with ineffective response forms a powerful basis for engaging with the City.

The framework governing public safety, land use, and infrastructure management in California and the City of Los Angeles is robust and places clear responsibilities upon public entities. The core legal argument emerging from the evidence is that the City of Los Angeles, and potentially the SMMC/MRCA through its contributory actions or inactions, has created and culpably maintained a "dangerous condition of public property" evidence shows that conditions in the Lake Hollywood area have been allowed to deteriorate to the point that they pose ongoing dangers to residents, visitors, and critical facilities in the Lake Hollywood area. This has occurred through a pervasive and long-standing pattern of failing to enforce its own mandatory safety codes and statutory duties, despite having extensive actual and constructive notice of the severe and foreseeable risks to public safety and critical infrastructure. This is not simply an unfortunate situation, but rather a predictable and preventable set of consequences resulting from prolonged inaction and neglect.

8. Conclusion and Recommendations for Remediation and Future Prevention

Summary of Governance Failures and Direct Link to Public Safety Crisis

The investigation detailed in this report compellingly demonstrates that the public safety crisis afflicting the Lake Hollywood area and threatening critical infrastructure on Mount Lee is the direct and foreseeable outcome of systemic governance failures. The City of Los Angeles, through persistent inaction or ineffective action of its Department of Transportation, Fire Department, Department of Recreation and Parks, Police Department, and City Council—has consistently failed to enforce a wide range of mandatory public safety codes. This includes, but is not limited to, codes pertaining to traffic management, speed limits, parking restrictions (critically, in fire lanes), fire prevention (especially brush clearance in a VHFHSZ), regulation of commercial activities such as tour buses and vending, and the overall safe management of public park access.

The Santa Monica Mountains Conservancy and its operational arm, the MRCA, have contributed to this crisis by inadequately coordinating trail and access management with the City, thereby allowing, or even exacerbating the concentration of tourist pressure on ill-equipped residential neighborhoods. The Hollywood Sign Trust, while a non-profit, has also played a role by actively promoting access to the Hollywood Sign

without concurrently ensuring or vigorously advocating for the necessary safety and infrastructure mitigations in the impacted communities.

This collective dereliction of duty has transformed a residential area into a zone of chronic hazard, characterized by debilitating traffic chaos, severely impeded emergency vehicle access, an elevated risk of catastrophic fire, and the endangerment of a communications hub vital to city-wide emergency services. These conditions represent ongoing governance failures that have allowed unsafe conditions to persist, requiring urgent corrective action by the responsible entities.

Specific, Actionable Recommendations for Each Entity (as context for Community Action)

The multifaceted nature of this crisis demands a coordinated, robust, and sustained response from the responsible entities. The following recommendations outline the types of actions these entities should be compelled to take, forming the basis for the community's advocacy and potential legal strategy:

City of Los Angeles (LADOT, LAFD, RAP, LAPD, City Council):

1. Immediate and Sustained Enforcement Saturation:

- Implement a continuous, zero-tolerance enforcement program for all existing traffic codes (speeding, illegal U-turns, tour bus restrictions under LAMC §80.36.11), parking regulations (particularly "No Parking Fire Lane" zones , Red Flag Day restrictions , and residential permit parking), illegal vending (LAMC §42.13, §63.44 B.3), and park use ordinances (LAMC §63.44, §86.02, §86.04, §86.06) within the Lake Hollywood area, its approach routes, and affected sections of Griffith Park.

2. Develop and Implement a Unified Hollywood Hills/Griffith Park Access & Tourism Management Plan:

- Mandate the creation of a single, comprehensive, and legally binding management plan, with defined carrying capacities, designated tourist access points, remote parking/shuttle systems, and strict prohibitions in sensitive residential zones.

3. Critical Infrastructure Upgrades and Safety Enhancements:

- Prioritize and fund necessary infrastructure improvements: traffic calming, pedestrian safety measures, and emergency access route enhancements.

4. Aggressive Fire Prevention and Mitigation in the VHFHSZ:

- Overhaul and intensify fire prevention efforts, including rigorous brush clearance (LAMC §57.4906.5.2, PRC §4291) and utility WMP oversight, ensuring power resilience for critical infrastructure on Mount Lee.

5. Moratorium on Promotion of Access to Overwhelmed Areas:

- The City and its affiliated entities must immediately cease all promotional activities that direct tourists to unprepared areas.

6. Establish Independent Oversight and Accountability:

- Create an independent Hollywood Hills Safety and Tourism Management Task Force with genuine oversight authority.

7. Develop Formalized Site-Specific Security and Operational Protocols for Mount Lee within Griffith Park:

- Develop and adopt specific physical security and operational protocols for Mount Lee, addressing access control, surveillance, vegetation management, emergency response, and integrated traffic management, incorporating guidance from Cal OES.

8. Regular Multi-Agency Risk Review, Drills, and Adaptive Management for Critical Infrastructure:

- Establish a formal working group for Mount Lee to conduct annual joint risk reviews, emergency drills, and review mitigation effectiveness.

Santa Monica Mountains Conservancy (SMMC) / MRCA:

1. Proactive and Coordinated Trail and Access Management:

- Fully integrate SMMC/MRCA trail access policies into the unified regional Management Plan, including potential trail closures/rerouting.

2. Rigorous Enforcement on SMMC/MRCA Lands:

- Significantly increase ranger presence and enforcement of all park rules, especially regarding illegal commercial activities.

3. Material Contribution to Regional Mitigation Solutions:

- Actively participate, logistically and financially, in regional solutions like remote parking and shuttles.

Hollywood Sign Trust:

1. Promotion of Responsible and Safe Tourism:

- Immediately revise all promotional materials to emphasize public safety and direct visitors *only* to officially designated and equipped access points.

2. Financial Contribution to Safety and Mitigation Efforts:

- Commit a significant and ongoing portion of funds to tangible safety, infrastructure, and management improvements in impacted communities.

3. Active Advocacy for Comprehensive Solutions:

- Leverage its platform to actively advocate for the City and SMMC to fully implement comprehensive safety and tourism management plans.

Call for Immediate and Sustained Action

The conditions documented in this report represent years, if not decades, of cumulative neglect and mismanagement. The safety of residents, the experience of legitimate visitors, and the integrity of critical public infrastructure now hang precariously in the balance. Further studies, incremental adjustments, or unenforced plans will not suffice. What is required is immediate, decisive, and—most importantly—*sustained* action from all responsible entities. The time for excuses and deferrals is over; the time for responsible governance and tangible solutions is now.