

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



Hilton Universal Expansion

Corilyn Oliva <corilynkoliva@yahoo.com>

Mon, Sep 9, 2024 at 10:57 AM

To: more.song@lacity.org

Cc: cpc@lacity.org

Mr. Song,

I am writing today in support of the Hilton Universal's proposed expansion project.

As a lifelong San Fernando Valley resident who currently lives about 5 minutes away from the property, I can tell you that this hotel is not just for tourist. It's also heavily patronized by folks in the neighborhood like me, notably for Café Sierra and Five on the Hill. It's also where I recommend friends to stay when they come to town from out-of-state with plans to visit Universal Studios.

I love this place, and seeing it flourishing again post-pandemic is hopefully a sign of full recovery. I am all for their expansion, especially the new restaurants that will be added. The Hilton Universal is a staple of this community, and I look forward to seeing the project approved and built!

Thank you for your consideration.

Corilyn Oliva
[10835 Moorpark St.](#)
[Los Angeles, CA](#)



Planning CPC <cpc@lacity.org>

In support of Hilton Universal expansion

Jessica Durrum <jdurrum@laane.org>

Mon, Sep 9, 2024 at 10:00 AM

To: more.song@lacity.org

Cc: cpc@lacity.org

Dear City Planning Commission:

Our vision at LAANE is to help build a new economy rooted in good jobs, thriving communities, and a healthy environment for all. It's with that sentiment, I am writing you today in hopes you will join us in supporting the Hilton Universal's Hotel's proposed expansion that will create hundreds of quality hospitality and construction jobs for hard working men and women.

Thank you,

--

Jessica Durrum

Deputy Director, Policy & Campaigns



Los Angeles Alliance for a New Economy

464 Lucas Ave. Suite 202 | LA, CA 90017

E jdurrum@laane.org

M 617-251-6844

P she/her



P: (626) 314-3821
F: (626) 389-5414
E: info@mitschtsailaw.com



139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

September 6, 2024

City Planning Commission
Los Angeles City Hall, Room 340
220 North Spring Street
Los Angeles, California 90012

P: (213) 978-1319

Em: more.song@lacity.org

Em: cpc@lacity.org

**RE: Western States Regional Council of Carpenters' Comments
Regarding the City of Los Angeles' 555 East Universal Hollywood Drive
Project (CPC-2017-5423-VZC-HD-CUB-CUX-SPR; SCH No.
2020100057).**

Dear President Lawshe, Honorable Commissioners, and More Song:

On behalf of the Western States Regional Council of Carpenters (“**Western Carpenters**” or “**WSRCC**”), my Office is submitting these comments for the City of Los Angeles’ City Planning Commission meeting addressing the 555 East Universal Hollywood Drive Project (CPC-2017-5423-VZC-HD-CUB-CUX-SPR; SCH No. 2020100057). (“**Project**”).

WSRCC would like to express its support for this Project. After further reviewing this Project, WSRCC believes that the Project will benefit the environment and the local economy by practicing protocols that will protect worker health and safety and will incorporate adequate environmental mitigation.

Should the City have any questions or concerns, the City should feel free to contact my office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Herwitt', is positioned above a horizontal line.

Jeremy Herwitt, Esq.

Attorneys for Western States Regional Council of Carpenters



Main Office Phone:
310-798-2400
Direct Dial:
310-798-2409

Carstens, Black & Minter LLP
2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254
www.cbcearthlaw.com

Amy Minter
Email Address:
acm@cbcearthlaw.com

September 9, 2024

Via Email (paul.caporaso@lacity.org; cpc@lacity.org)

City Planning Commission
City of Los Angeles
c/o Paul Caporaso
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Supplemental Comments in Support of Appeal on TVC 2050 Project; ENV-2021-4091-EIR; CPC-2021-4089-AD-GPA-ZC-HD-SP-SN; 7716-7860 West Beverly Boulevard, Los Angeles 90036

Honorable Commissioners:

We submit these supplemental comments on behalf of Save Beverly Fairfax in support of our appeal of the Advisory Agency's approval of Vesting Tentative Tract No. 83387 and certification of the environmental impact report ("EIR") and adoption of a statement of overriding considerations, mitigation and monitoring program and findings under the California Environmental Quality Act ("CEQA") for the TVC 2050 Project.

The City Should Deny Approval Until a Stable and Complete Project Description is Provided.

As detailed in previous comments submitted by Save Beverly Fairfax and other appellants, the project description for the TVC 2050 Project remains unstable and incomplete, in violation of CEQA's clear requirements. The lack of adequate detail regarding what the actual project would be is particularly concerning given that the draft Specific Plan would make the majority of future approvals at the Project site ministerial, and thus subsequent environmental review or future mitigations could not be required. The Specific Plan overrides otherwise applicable zoning requirements for discretionary review, such as Site Plan Review under Los Angeles Municipal Code section 16.05. The applicant is asking the City to approve an undisclosed type, arrangement and amount of development with very limited if any ability to review the specific development further prior to construction. The City should reject this request.

The lack of stable information regarding the apportionment of development types and arrangement of development on the Project site prevents an analysis of the Project's impacts, as discussed in detail in previous comments. Additionally, the EIR has identified the need for security fencing and other barriers to enclose the Project's working production studio facilities. Currently, those barriers are at the boundaries of the Project site. The Specific Plan would allow for significant amounts of General Office and Retail use not related to studio facilities. The EIR fails to address whether the Project would need to include internal security barriers on the Project

site to separate the studio uses from the non-studio uses. These barriers could have adverse historic and aesthetic impacts on the Television City Historic Cultural Monument that have not yet been addressed. However, under the proposed Specific Plan, such development would likely be included with only ministerial review, providing no opportunity to address such impacts.

The Statement of Overriding Considerations Fails to Comply With CEQA's Requirements.

The EIR for the TVC Project admits that the Project would have significant and unavoidable construction air quality impacts, significant cumulative construction and operation air quality impacts, and significant construction noise and vibration impacts. Moreover, as detailed in previous comments, and the detailed comments submitted by many other community members, the Project would have numerous other significant adverse impacts that the EIR fails to disclose. CEQA prohibits approval of a project with significant and unavoidable impacts if there are feasible less impactful alternatives. (Pub. Resources Code § 21081, subd. (a)(3).) In order to approve a project with significant and unavoidable impacts such as this, the City must be able to make findings that less impactful alternatives are not feasible and findings that the Project would have benefits that override the Project's significant adverse impacts. The City cannot make either required finding and thus approval of the Project is improper under CEQA.

As set forth in Save Beverly Fairfax's previous comments, the EIR improperly rejected less impactful alternatives based on reliance on the Project applicant's overly narrow project objectives and an inadequate assessment of alternatives. (See *Save the Hill Group v. City of Livermore* (2022) 76 Cal.App.5th 1092, 1109; *We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683, 692 [it is improper to rely on overly narrow project objectives to "ensure[] that the results of [the EIR's] alternatives analysis would be a foregone conclusion."].) Thus, the City lacks the necessary substantial evidence to reject these alternatives and approve the Project with its significant impacts. (CEQA Guidelines, §15091, subd. (a)(3).)

CEQA Guidelines section 15093, subdivision (b) requires that when a lead agency approves a project that would result in significant, unavoidable impacts, "the agency shall state in writing the specific reasons to support its action" in a statement of overriding considerations. These project benefits are in addition to the required finding of no feasible alternatives to substantially lessen a project's significant adverse impacts, and CEQA also requires substantial evidence in the record support the claimed benefits to justify proceeding with a project despite its adverse impacts. (Public Resources Code, §21081; CEQA Guidelines §15093, subds. (b), (c).) "[A]n unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (*Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 717.) "[A] statement of overriding considerations, like an EIR, must make a good-faith effort to inform the public;" the "statement's purposes are undermined if its conclusions are based on misrepresentations...or it misleads the reader about the relative magnitude of the impacts and benefits..." (*Id.* at 718.)

The statement of overriding considerations relies on several claimed economic benefits of the Project as a basis for overriding significant impacts. (LOD pp. 105-107.) However, the record fails to provide any financial analysis to support such claimed benefits. Without substantial

evidence to support such claims, the City cannot rely on alleged economic benefits to allow for the imposition of 20 years of significant adverse construction impacts on the community surrounding the TVC Project site. The statement of overriding considerations also claims these serious impacts should be overridden because the Project supports the Wilshire Community Plan and Mobility Plan 2035. As addressed in Save Beverly Fairfax's comments on the draft and final EIR, the Project is inconsistent with both plans, thus this claimed benefit is unsupported.

Conclusion

For the reasons set forth herein, and in the numerous comments identifying the lack of adequate disclosure, analysis and mitigation for the TVC Project, we urge you to uphold our appeal and require revised and recirculated environmental review. This is necessary to provide adequate information to decisionmakers such as yourselves and to for informed public review.

Sincerely,



Amy Minter

August 2024

Dear City Planning Commission,

My name is Caledonia Hanson, and I was part of the original Illumination Training at TVC in 2021. At the time, I was nearly a year into homelessness. Like many others when the pandemic hit, I lost my work and apartment, exhausting my savings just to survive. Living out of my bags and working grueling jobs that took a toll on my body, I had no idea how this would impact my career in the film industry.

As a member of Women in Media, I received an email encouraging applications for Illumination within three categories. I applied for the production design workshop, not expecting much. When I found out I was selected, I was at work, and the relief had me slumped on the bathroom floor, feeling the first glimmer of hope for my future since I lost everything.

That summer, I drove back to Los Angeles, using my savings to stay in a hotel near the studio. We were tasked with learning and creating props and set dressing for Women in Media's second Camaraderie that year—a project I had been a production designer for and was thrilled to return to even as just a helping hand.

The only hesitation I had, which I never hid but didn't fully express, was that I'm disabled. I have a rare disease that leaves my joints prone to dislocation, and I've had multiple surgeries to address the damage. I wasn't sure how I'd be received, but I refused to let anyone make decisions for me.

I needn't have worried. No one hovered over me to ensure I wouldn't make a mistake with electric tools. No one questioned my ability to mold foam, work with insulation, or tackle any task set out for us. No one batted an eye at my cane or spoke down to me for doing things differently. It was the first time in my (then) 12+ year career in the industry that I felt seen as the professional I am, not a liability.

TVC's commitment to providing opportunities for underserved groups in entertainment is central to their mission to diversify the industry. Through the Illumination Training, they have empowered over 250 underrepresented people like myself, offering hands-on learning and networking opportunities with industry professionals. Learning from industry veterans and gaining real-world experience at TVC studios

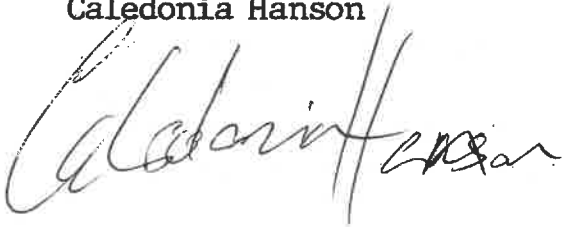
was pivotal in equipping me with the skills and confidence to know that my career, and my life, would be okay—no matter how long it took.

I wholeheartedly support TVC's growth and dedication to becoming a trailblazer for people like me and others who would otherwise face gatekeeping, harassment, and judgment for being anything other than able-bodied, cis, hetero, white men. Their plan isn't just beneficial for people like me but for communities within LA struggling to find work and dealing with the impact of the city's long-standing failure to maintain historic infrastructure and flow of traffic.

I'll see you at the hearing and look forward to being one of many pushing TVC's mission forward as someone whose life they changed for the better.

With gratitude,

Caledonia Hanson

A handwritten signature in cursive script, appearing to read "Caledonia Hanson", written in dark ink.



EUC

Entertainment Union Coalition

September 9, 2024

City of Los Angeles-City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

RE: Television City Project (CPC-2021-4089-AD-GPA-ZC-HD-SP-SN; CPC-2021-4090-DA;
ENV-2021-4091-EIR: VTT-83387)

Dear City Planning Commission,

On behalf of the over 160,000 working men and women that the Entertainment Union Coalition (California IATSE Council, Directors Guild of America, LiUNA! Local 724, SAG-AFTRA, and Teamsters Local 399) represents, who live and work in California, primarily in the Los Angeles area, we are writing to express our strong support for the Television City (TVC) Project.

Our industry and---most importantly for us---our members are facing a challenging future with film and television production declining precipitously in the City of Los Angeles. Work is scarce and a significant number of our members, and their families, face losing their health coverage and their homes because there is so little production here. By way of illustration, the September 5 *Production Weekly* lists 121 productions in the US and around the world—with only 5 of them filming in Los Angeles/CA. Attached is a recent article from *The Ankler*, an industry trade publication, highlighting the situation.

That is why TVC is so important at this moment. It represents a concrete commitment to supporting and growing our city's signature industry and preserving the legacy of this iconic studio by building production facilities to meet today's production needs.

Without our members films and television productions would not exist—they are the directors, actors, cast and crew who bring their diverse talents and skills to every production. Their labor has made Los Angeles the entertainment capital of the world for over 100 years. Most are not faces you see on the screen or read about in magazines, but their contributions are essential. They raise their families here, pay taxes here, and send their kids to school here. Now many of them are considering leaving Los Angeles, taking with them one of the biggest economic drivers



of our economy. They aren't choosing to leave Los Angeles, but in order to take care of themselves and their families they will have to.

We need projects like Television City that show our city is committed to keeping jobs and work in Los Angeles. We strongly believe that investments like the TVC Project are critical to ensuring continued work for our members and protecting the viability of hundreds of small businesses who exist as a result of production work in this city.

When the Olympic torch was passed from Paris to Los Angeles, the visual representation of Los Angeles was the "Hollywood" sign. That was appropriate because the world associates our city with that iconic symbol and the films and television productions they enjoy on the screen. We can't afford for that to be a sign from a bygone era.

We fully support the Television City Project and urge the City of Los Angeles to process its quick approval.

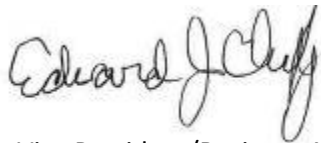
Sincerely,



Thom Davis
President
California IATSE Council



Rebecca Rhine
Associate National Executive Director
Directors Guild of America



Vice President/Business Agent
Teamsters Local 399



Business Manager/Sec-Treasurer
LiUNA! Local 724



Kerri Wood Einertson
National Director, Government Affairs & Public Policy
SAG-AFTRA

Cc Paul Caporaso, Los Angeles Department of City Planning

September 10, 2024

BY EMAIL

City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Appeal of Advisory Agency's Approval of Vesting Tentative Tract Map No. 83387 for TVC 2050 Project (VTT-83387 and ENV-2021-4091-EIR)

Honorable President and Commissioners:

This firm represents Mayer Beverly Park Limited Partnership, an affiliate of Apartment Income REIT Corp., which owns and operates the Broadcast Center Apartments ("Broadcast Center") at 7660 Beverly Boulevard ("BC Site"), located adjacent to the site of the TVC 2050 Project (the "Project") as currently proposed by Television City Studios, LLC, which we understand is controlled by Hackman Capital Partners ("Hackman").

This letter provides further support for our client's appeal of the Advisory Agency's approval of Vesting Tentative Tract Map No. 83387 ("VTTM") for the Project that covers an approximately 25-acre site located at 7716-7860 Beverly Boulevard (the "Project Site") in the City of Los Angeles (the "City").

We relatedly submitted a September 3, 2024 letter to you ("September 3 Letter") with respect to unlawful aspects of the Final Environmental Impact Report ("FEIR") and Erratum No. 1 ("Erratum") prepared for the Project that supported the Advisory Agency's approval of the VTTM.

As a reminder, the BC Site is adjacent to the Project Site at both its western and southern boundaries. It also borders Beverly Boulevard to the north and The Grove Drive to the east. Broadcast Center affiliates also own nearby Palazzo West, Palazzo East and Villas at Park La Brea, which collectively provide, including the approximately

500 Broadcast Center residents, housing for more than 3,000 residents who live in close proximity to the Project Site and would be significantly impacted by the Project.

One of our client's primary concerns, as neighboring property owners with a significant number of residents who will be affected by the Project, is that they were not provided adequate notice or given an opportunity to be heard at the public hearing regarding the VTTM that was approved by the Advisory Agency. The VTTM that was approved by the Advisory Agency was not the VTTM that was available to the public for review and considered at the public hearing. In addition, Broadcast Center continues to have no idea what Hackman might actually develop on the Project Site. This concern extends to the VTTM for the Project, which provides limited details and was approved despite substantive informational gaps and clear procedural errors.

As noted in our appeal justification letter and in the eight other appeals regarding the VTTM (collectively, the "Appeals"),¹ the Advisory Agency's approval of the VTTM was unlawful for several reasons.

First, the Department of City Planning ("Planning") and Advisory Agency did not follow the required procedures for a vesting tentative tract map approval. For example, Planning admits (without justification) to circulating an outdated version of the VTTM, dated March 26, 2021 (the "2021 VTTM"), to the City departments making up the "Subdivision Committee" (the "Subdivision Committee"), despite having received from Hackman a copy of a revised VTTM one day prior to the circulation of the 2021 VTTM to the Subdivision Committee ("March 2024 VTTM"). Why would Planning circulate an older version of the map to the Subdivision Committee if a new version reflecting modifications to the Project was available? Worse still, only the 2021 VTTM was made available to the public and considered in the staff report prepared by Planning for the public hearing on the proposed VTTM on May 15, 2024. The Advisory Agency then approved the March 2024 VTTM,² which had not been made available to the public prior to the public hearing, in the Letter of Determination dated May 28, 2024 (the "VTTM Determination"). Also, the March 2024 VTTM attached to the VTTM Determination

¹ We hereby incorporate by reference the eight other appeals of the Advisory Agency's approval of the VTTM and certification of the FEIR.

² For purposes of this letter, we are assuming that the March 2024 VTTM provided to the City by Hackman on March 27, 2024 is the same as the VTTM that the City ultimately approved, which was stamp dated May 17, 2024 two days after the public hearing occurred. We are basing this assumption on statements from Planning on pages A-3 to A-4 of "Appeal Report" for the CPC (the "Appeal Report"). We do not have a copy of the March 2024 VTTM that Hackman transmitted to the City.

was stamped "Submitted for Filing" on May 17, 2024, two days after the May 15, 2024 public hearing occurred.

Second, the March 2024 VTTM does not contain the necessary information required for a *vesting* tentative tract map by the Los Angeles Municipal Code ("LAMC") Sections 17.06 B and 17.15 B(1)(b).

Third, the Advisory Agency's findings that the March 2024 VTTM is consistent with the General Plan cannot be made and violate the California Subdivision Map Act (California Government Code § 66410 *et seq.*, the "Map Act").

These issues are discussed in more detail below. Based on these concerns, our client respectfully requests that the City Planning Commission ("CPC") grant the Appeals and take the following actions at the September 12, 2024 public hearing for the Project:

1. Reject the Advisory Agency's approval of the March 2024 VTTM, pursuant to LAMC Sections 17.54 A and 13 B.7.3(G).
2. Require Hackman to correct the March 2024 VTTM to include the missing information mandated by LAMC Sections 17.06 B and 17.15 B(1)(b).
3. Require Planning to circulate a corrected version of the March 2024 VTTM for review and consideration by the Subdivision Committee as necessitated by LAMC Sections 17.03 B and 17.04 B.
4. Require the Advisory Agency to hold a new public hearing to consider the corrected version of the March 2024 VTTM.

I. The Advisory Agency Failed to Follow the Procedural Requirements of the LAMC and Unlawfully Approved the March 2024 VTTM.

This is very straightforward. The March 2024 VTTM was not available to the public or the Subdivision Committee prior to the Advisory Agency's approval, which is in direct conflict with the processes and procedures required by the LAMC and state law. As such, the approval of the March 2024 VTTM is void.

To start with, LAMC Section 17.03 B states that "[e]very Tentative Map shall be considered by the Advisory Agency at a public meeting." This requirement was not met. The Advisory Agency approved a map that was stamp-dated two days after the hearing occurred. So the March 2024 VTTM was not considered by the Advisory Agency at a

public meeting. Only the 2021 VTTM was considered by the Advisory Agency and available for public comment at and prior to the May 15, 2024 public hearing. Only the 2021 VTTM was contemplated in the Staff Report prior to the public hearing. The March 2024 VTTM was not mentioned in the Staff Report at all, despite Planning's statement that it received the March 2024 VTTM prior to the public hearing, prior to circulation of the 2021 VTTM to the Subdivision Committee and prior to release of the Staff Report.

The Advisory Agency's comments at the hearing and Hackman's acknowledgement at the hearing that the 2021 VTTM would be revised, without the public having access to the March 2024 VTTM, is insufficient to meet the public hearing requirement under the LAMC. The City even admitted that the 2021 VTTM was the subject of discussion during the public hearing and the March 2024 VTTM was not reviewed until the "advisement period following the hearing."³ See Appeal Response No. 1-10 on page 10 of Exhibit D.1 to the Appeal Report.

Next, LAMC Section 17.03 B requires that the Advisory Agency "shall not act on a tentative map until 39 days has elapsed from the filing of the map, unless reports have been received from each member of the Subdivision Committee."⁴ This requirement was not met. The March 2024 VTTM was never sent to the Subdivision Committee. Only the 2021 VTTM was circulated to the Subdivision Committee, even though Planning had an opportunity to circulate the March 2024 VTTM. As Planning acknowledged, Hackman provided the City with the March 2024 VTTM, dated March 25, 2024, on March 27, 2024, one day prior to Planning circulating the 2021 VTTM to the Subdivision Committee on March 28, 2024. Planning failed to circulate the March 2024 VTTM to the Subdivision Committee for their consideration.

Relatedly, LAMC Section 17.04 also requires the Subdivision Committee to "meet with the Advisory Agency and to make recommendations upon all Tentative Maps . . . and such other matters as are presented to the Advisory Agency." This requirement also was not satisfied. The March 2024 VTTM was not sent to the Subdivision Committee prior to the public hearing, even though the City apparently had a copy of this map, which reflected the updated project scope.

Planning also acknowledged that the March 2024 VTTM was never circulated to the Subdivision Committee (*see* Appeal Report on pages A-8 to A-9). Planning argues

³ The City does not specify who or what department(s) reviewed the March 2024 VTTM during the advisement period. Did the Subdivision Committee review the March 2024 VTTM prior to approval?

⁴ See also LAMC § 17.06 A.1.

that the March 2024 VTTM did not require recirculation to the Subdivision Committee because (1) the differences between the March 2024 VTTM and 2021 VTTM are not material in nature regarding the "technical requirements of LAMC Sections 17.06 B and C" and (2) these minor changes do not rise to the level of a "Revised Tentative Map" under LAMC Section 17.02.

These statements, however, are not supported by the evidence. First, the March 2024 VTTM included entirely new building envelopes, approximate locations of buildings and driveway locations. As discussed in more detail below, these relate to informational requirements in the LAMC Section 17.15 B(1)(b) for vesting tentative tract maps. The City ignores the substantive differences between the two maps with respect to LAMC Section 17.15 B(1)(b) by focusing solely on LAMC Section 17.06. Second, the March 2024 VTTM, included as part of the VTTM Determination, is stamped as a "Revised Tentative Map," which implies that it was in fact a revised map. How can the City now state that it does *not* constitute a revised tentative map?

We emailed Planning on May 8, 2024, prior to the public hearing on May 15, 2024, to confirm if the 2021 VTTM would be considered by the Advisory Agency, or if the 2021 VTTM had been, or was going to be, revised for consistency with the Project, as modified in April 2024. Planning provided an email response on May 9, 2024 that the hearing would be held on the 2021 VTTM "as it is the map that was circulated to the various departments."

Why did the City not provide the public (and the Subdivision Committee) with the VTTM it intended to approve prior to the public hearing, especially if the City received a copy of the updated map from Hackman on March 27, 2024? This email exchange with Planning directly contradicts Appeal Response No. 3-3 on page 52 of Exhibit D.1 to the Appeal Report, prepared by Eyestone Environmental, which states that the revised VTTM "was made part of the public record and considered by the Deputy Advisory Agency at the May 15, 2024, public hearing." This is false. The City cannot now state that the March 2024 VTTM was incorporated into the public record for consideration by the Advisory Agency at the public hearing. Appeal Response No. 3-3 also contradicts the statement in Appeal Response No. 1-10 that the 2021 VTTM was the "basis for discussion with members of the Subdivision Committee during the hearing" and that the March 2024 VTTM was "reviewed during the advisement period following the hearing." If the City cannot coherently articulate which version of the VTTM was considered at the May 15, 2024 public hearing, then how could the public have any idea?

These errors not only violate the City's own processes and procedures, but also the procedural requirements of the Map Act. Both the subdivider and neighboring owners must be given notice and an opportunity to be heard on a tentative map application as a matter of statutory right under California Government Code section 66451.3. In addition, as a matter of procedural due process, the neighboring owners, including Broadcast Center, must have an opportunity to see the map the City intends to approve prior to its approval. Here, the public did not lay eyes on the March 2024 VTTM until May 28, 2024, when the VTTM Determination was issued. And, as stated previously, the March 2024 VTTM approved in that VTTM Determination was date-stamped two days after the public hearing occurred.

For these reasons alone, the Advisory Agency's approval of the March 2024 VTTM was unlawful. Additional reasons follow.

II. The March 2024 VTTM Does Not Include All of the Information Required By the LAMC for a Vesting Tentative Tract Map.

The March 2024 VTTM does not contain all of the information required by the LAMC for a vesting tentative tract map. In particular, LAMC Section 17.15 B(1) contains additional requirements for vesting tentative tract map that do not apply to non-vesting tentative tract maps, including that "[t]he plan of building envelope shall be submitted, showing the height, size, number of units and approximate location of buildings, driveways and any proposed exterior garden walls." The March 2024 VTTM approved for the Project does not include this information.

In response, Planning claims on page A-10 of the Appeal Report that these requirements are not required to be shown on the map itself and could be provided as part of the entitlement plans submitted for the planning application. Planning further states that the architectural plans submitted by Hackman are sufficient to meet this requirement.

This is unpersuasive for several reasons. First of all, it is unclear what plans Planning refers to. The entitlement plans that Hackman submitted with the 2021 VTTM were submitted in June 2021 ("Application Plans"). Are these the "architectural plans" that Planning relies on? Or is Planning referring to the "Modified Initial Development Plans" attached as Appendix A to the Erratum?

Second, LAMC Section 17.15 B(1)(b) does not state that its informational requirements can be met by entitlement plans submitted concurrently with a project application. The City's own form ([CP-6110](#) [7.25.2024]), which lists the "Technical Map Requirements" for vesting tentative tract maps, requires applicants to include the building

envelope information on the map itself. To quote the form: "In addition to the information requested for the Tentative Map, a Vesting Tentative Map requires the following information:... Building envelope showing height, size, number of units, location of buildings, driveways, and exterior garden walls."

Third, as stated in our September 3 Letter, both the Application Plans and the Modified Initial Developments Plans are entirely "conceptual" and "illustrative" in nature. These architectural plans are not fixed and just "illustrate one possible development scenario." As an example, based on the elevations on Sheet A2 of the Modified Initial Development Plans (Site Elevation - East [The Grove Drive]), the height of each illustrative soundstage is approximately **70 feet** and the height of the illustrative office building is approximately **104 feet**. But these illustrative buildings are located in Height Subarea B, which has a base height limit of 88 feet, but allows a maximum height of **145 feet** in 40% of Subarea B. This cannot possibly meet the requirements of LAMC Section 17.15 B(1)(b), which requires the vesting tentative tract map to show the *actual* building heights. Hackman cannot provide illustrative improvements to comply with LAMC Section 17.15 B(1)(b). Rather, it must provide a VTTM that includes specific, fixed improvements. Hackman's failure to include any improvements on the March 2024 VTTM, and the absence of an accurate, stable and finite Project, violates LAMC Section 17.15 B(1)(b) and leaves the public, including Broadcast Center, without any idea of the project to which the March 2024 VTTM relates.

Furthermore, the depiction of the Project in the March 2024 VTTM is inconsistent with the Project described in the FEIR, the Erratum and the proposed Specific Plan. Notably absent from the March 2024 VTTM are the multiple new driveways conceptually proposed on Fairfax Avenue, Beverly Boulevard and The Grove Drive and conceptually depicted in the "Conceptual Site Plan" in Figure 1 of the Erratum. The March 2024 VTTM only shows one driveway off of Beverly Boulevard. The March 2024 VTTM also does not show the private streets proposed on the Project Site, including the two new onsite project streets that would border the southern and western boundaries of the BC Site. This critical information is required by LAMC Section 17.06 B.14. How could the Subdivision Committee and Advisory Agency properly consider the Project's impacts on Broadcast Center and the surrounding areas and assess consistency with the Mobility Element without this information in the VTTM? In fact, it could not.

III. The March 2024 VTTM Violates Requirements in the Map Act.

As stated in our appeal justification letter, the Advisory Agency's findings that the March 2024 VTTM is consistent with the City's General Plan are unsupported, inaccurate and unlawful. Section 66474 of the California Government Code (a provision of the Map Act) requires the City to deny a vesting tentative tract map request if "the proposed map is not consistent with applicable general and specific plans as specified in Section 65451." LAMC Section 17.05 C includes a consistent requirement that "[e]ach Tentative Map shall substantially conform to all other elements of the General Plan."

The City's response that the appellant "does not provide any evidence of inconsistency and in fact does not identify any specific objective or policy with which the subdivision would conflict" is not a good-faith, reasoned response. There is no question that the current land use designations for the Project Site in the Wilshire Community Plan do not permit the Project as proposed, which is why multiple general plan amendments are required for the Project. Specifically, the Project requires general plan amendments to: (1) change the land use designations of the Project Site from Community Commercial, Limited Commercial, and Neighborhood Commercial to Community Commercial, (2) assign a Community Commercial land use designation to a 0.63-acre portion of the Project Site located within unincorporated Los Angeles County to be annexed to the City, and (3) add a footnote establishing the "TVC Zone" as a corresponding zone to the Community Commercial land use designation.

The conditions of approval highlighted by the City in Appeal Response No. 1-11 on page 11 of Exhibit D.1 to the Appeal Report do not cure this violation. The City claims that Condition of Approval Nos. 50, 10.N and 10.J are evidence that the City "approved the VTTM contingent upon approval of the General Plan Amendment . . ." This is not accurate. In fact, none of these conditions relate to the General Plan at all. There is simply no evidence whatsoever to support the City's finding that the March 2024 VTTM, as approved, is consistent with the City's General Plan. This violates both the Map Act and LAMC requirements.

In addition, the March 2024 VTTM omits a note that the subdivision is inconsistent with the existing zoning. This violates California Government Code section 66498.3(a) (a provision of the Map Act), which mandates that "[w]henver the subdivider files a vesting tentative map for a subdivision whose intended development is inconsistent with the zoning ordinance in existence at that time, that inconsistency shall be noted on the map."

For all of these many reasons, we respectfully request on behalf of our client that the CPC grant all of the Appeals and take the actions specified in the introduction of this letter. We also request that the CPC direct Planning to revise and recirculate the Draft Environmental Impact Report for the Project to address the numerous and unresolved deficiencies identified in the hundreds of comment letters submitted by our clients and other members of the public.

Very truly yours,

A handwritten signature in black ink, appearing to be 'L. Chang', written in a cursive, stylized manner.

Lauren K. Chang

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

FIX THE CITY

September 12, 2023

TO: LA CITY PLANNING COMMISSION Paul.Caporaso@lacity.org

FROM: FIX THE CITY (LAURA LAKE, PH.D.) Laura@FixTheCity.org

RE: **SEPT. CPC AGENDA ITEM 9. VTT-83387-1A, ENV-2021-4091, CPC 2021-4089-AD-GPA-ZC-HD-SP-SN, CPC-2021-4090-DA, TVC, 7716-7860 Beverly Blvd.**

Dear Planning Commissioners:

Fix The City respectfully submits the following comments in opposition to the proposed project.

1. What is the position of the Councilmember. We don't know. There has been no effort to act as an honest broker to demand a project that is acceptable to both the applicant and its neighbors.
2. This Project Ignores The **Mayor's Local Housing Emergency Declaration** Calling For Increased Housing Production. *Instead, it removes potential housing from a 25-acre site.* A contribution to CD 5 of \$1 M for affordable housing (p. A-15) is not even a drop in the bucket, when affordable housing units are \$800,000. It does not compensate for losing hundreds of potential dwelling units in the Housing Element.
3. The project violates the **Housing Element**, the **Framework Element**, and the **Wilshire Community Plan**, the land use element of the General Plan. Therefore, the mandatory finding under the **Subdivision Map Act** and **Charter Sections 555 and 556** for consistency with the General Plan cannot be made. The project is not substantially in compliance with the General Plan. Instead, it is a serial violator of the General Plan.
4. This Project Violates The **Housing Crisis Act and SB 8** by removing potential housing from the **Housing Element**. Under this approval, Housing is no longer by-right.
5. This site is **Not An Area Targeted For Increased Density** In The Framework Element Diagram. This requires an amendment of the General Plan Framework, based on substantial evidence, and compliance with **LAMC 11.5.6**.
6. The mandatory finding of adequate transportation capacity under the **Wilshire Community Plan Policy 16-2** cannot be made. Adequate capacity is different from incremental increases in traffic under the CEQA thresholds. Contributing to additional gridlock is like throwing gasoline on a fire.
7. The Wilshire Community Plan states a fundamental premise regarding "adequacy:"
"If this monitoring finds that population in the Plan area is occurring faster than projected; and that **infrastructure resource capacities are threatened in relation to user need**, particularly critical ones such as **water and sewerage**, but also including public schools, **police and fire services, and transportation infrastructure**; and, that there is not a clear commitment to at least begin the

necessary improvements within twelve months; **then building controls** would be put into effect for the affected portions of the Wilshire Community until land use designations for the Community Plan and corresponding zoning are revised to more appropriately limit new development.” (p. III-1, emphasis added).

Issuance of a Statement of Overriding Considerations in an EIR does not comply with the requirement of safeguarding adequate services before making things worse. Approval of the project when there isn't adequate service or infrastructure is not an option under the Community Plan.

8. SAFETY: The VTT is entirely within [Fire District 1](#). Since the VTT is entirely devoid of specifics, it is impossible to reach a conclusion based on the record that this VTT will comply with Fire District 1 requirements. That is why a VTT needs to be detailed – to safeguard public safety. *Without an internal circulation plan and specific footprints, it is impossible to determine fire access to structures.*

9. *The city has failed to define adequate response time.* Therefore, it is arbitrary and capricious to conclude that response time is adequate. Whether anyone will respond in time to save lives is the question. ***Each minute of delay reduces survival by 10%.*** The national standard for EMT response time is 5 minutes. Despite heroic efforts, LAFD is not meeting the benchmark for response time. Increased traffic congestion and blockage from trucks lacking adequate queuing and circulation on the site, will contribute to increased risk to public safety. DCP must provide evidence that response time is adequate under the Wilshire Community Plan.

10. Under the **Subdivision Map Act**, the City has a right to deny this map because it poses **a threat to the safety of the immediate community**. A lack of **adequate queuing capacity and internal circulation** with turnaround space for large trucks poses a hazard by blocking Beverly Blvd. and Fairfax Avenue. Its approval must be based on the evidence provided by testimony and the record. There is nothing in the record indicating that this project will not impact the local street system and impede emergency access.

11. Studios rely on large trucks. There is **no circulation plan within the site**, no turnaround space for trucks, and no queuing space for trucks and autos. The driveways will back up into Beverly and Fairfax. This will create delay costs that have not been disclosed or mitigated.

12. Many LAFD stations are often “dark” due to staff shortages. When the first-in station is dark, stations further away respond and must travel longer distances. This too increases response time. The added traffic congestion from this project will further slow response time because LAFD is woefully understaffed.

13. City CEQA Guidelines require a map showing every intersection LOS E or F in the project area. This has not been provided. The Guidelines state that added congestion will slow response time. There is no map.
14. This project's justification is very similar to the assurances made by Fox Studios when they built their high-rise office tower in Century City, insisting that it too would allow creative synergy for movie production. That building was then sold and was not part of studio operations. Fool me once....
15. There is no commitment for studio use. The market for offices is very weak. The project appears to be seeking a blank check on entitlements and may wind up flipping it to a new owner who has other plans.
16. When the tract map was modified before the hearing, was the modified map disclosed to the public and distributed prior to the Advisory Agency vote?
17. We incorporate by reference all comments already in the record.
18. Fix The City requests that you deny this application. The Applicant is welcome to build and improve this site with the entitlements that were purchased, but not increase entitlements at the expense of the entire community and future housing.

Sincerely,

Laura Lake

Laura Lake, Ph.D.

FIX THE CITY



CITY TOURISM DEPARTMENT

LOS ANGELES CONVENTION CENTER
1201 S. FIGUEROA STREET
LOS ANGELES, CA 90015

(213) 765-4601

September 9, 2024

More Song, City Planner
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Via Email

Dear Mr. Song:

SUBJECT: Case Number: ENV-2017-5424-EIR

As Chief Tourism Officer and Executive Director of the Los Angeles City Tourism Department (CTD), I would like to express our support for the Hilton Universal's proposed expansion project at 555 Universal Hollywood Drive. The project would further the City's goals of increasing tourism growth by adding more hotel rooms to meet future demand, which in turn increases economic development of the region and creates long-term benefits for our residents, businesses, and other stakeholders.

The mission of CTD is to enhance and increase Los Angeles' prominence as a world-class tourist and convention destination. CTD promotes policies that drive economic development, create jobs, and improve the experience visitors have when visiting the City's unique cultural, sports, entertainment, and leisure attractions. The Hilton Universal has been a staple of the San Fernando Valley for decades and is one of the largest hotels in the region. Operating at or near capacity year-round, the Hilton Universal's proposed expansion aligns with CTD's goals. By opening in advance of the 2028 Summer Olympics, the Hilton Universal's expansion will add desperately needed hotel rooms to the distinctive culture and character of Universal City.

This expansion also serves the goals of the City's Tourism Master Plan, which is a destination management plan that analyzes Los Angeles' tourism assets and looks at what

infrastructure is required in order to handle the large increase in visitation expected in the upcoming years. The Tourism Master Plan contains many important recommendations to develop and position Los Angeles as a leading tourist destination. Understandably, one of the key recommendations is to identify and advocate for new hotel development opportunities.

The Hilton Universal Expansion project would deliver 395 new rooms, which would improve the City's hotel stock and be consistent with the goals of the Tourism Master Plan. Hotels are essential providers of high-quality jobs and account for a substantial part of the workforce in Los Angeles County. These entry-level, well-paying jobs lead to careers and economic stability.

Also, the project has the ability to improve the City's tax base and help fund LA's General Fund to pay for City services. CTD welcomes projects willing to invest in the City and facilitate a post-pandemic recovery of the hospitality industry. Accordingly, CTD feels that the Hilton Universal Expansion aligns with its mission, the City's major tourism-related initiatives, and the Tourism Master Plan, and thus encourages the City to approve the project and ensure that the applicant can feasibly develop it.

For the reasons noted above, and generally to advance the San Fernando Valley and the City of Los Angeles as a world-class destination, CTD enthusiastically supports the Hilton Universal Expansion project and looks forward to its approval and eventual opening.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DLiu', is positioned above the printed name and title.

Doane Liu
Executive Director

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	San Diego
Düsseldorf	San Francisco
Frankfurt	Seoul
Hamburg	Silicon Valley
Hong Kong	Singapore
Houston	Tel Aviv
London	Tokyo
Los Angeles	Washington, D.C.
Madrid	

September 10, 2024

VIA PUBLIC COMMENT PORTAL

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

Re: TVC 2050 Project (Case Numbers CPC-2021-4089-AD-GPA-ZC-HD-SP-SN; CPC-2021-4090-DA; and ENV-2021-4091-EIR, together with the related VTT-83387 the “Project”)

Dear Honorable Commissioners,

On behalf of The Grove, LLC, we respectfully request that the Planning Commission recommend denial of the requested General Plan Amendment, Zone Change and Height District Change, Specific Plan, Sign District, Annexation, and related certification of the Final Environmental Impact Report and adoption of the Environmental Findings, Statement of Overriding Considerations and Mitigation Monitoring Program for the TVC 2050 Project.¹

The Project remains unclear. While the City Planning Department staff reports and EIR say it is a “studio project,” the proposed Project entitlements do not actually require continuation and development of a working studio. The City’s Municipal Code-based development regulations would be superseded by a Specific Plan that was not made available to the general public until just before release of the Final EIR. The proposed Specific Plan over-broadly defines permitted uses and fails to adequately regulate development of the Project site. Statements made in the staff reports and EIR are inconsistent with the provisions of the Specific Plan. The EIR did not assess the range of unregulated uses that would be permitted under the Specific Plan and the City did not adequately respond to the EIR comments from hundreds of community members. The City and applicant need to decide on a project and start the process over. The Planning Commission cannot and should not recommend approval of the TVC 2050 Project.

¹ We incorporate by reference our September 13, 2022, comments on the Draft EIR, The Grove’s May 14, 2024, letter prior to the Advisory Agency hearing, our letter of September 3, 2024, to this Commission regarding the related appeal of VTT 83387, and all opposition comments submitted on the Draft EIR and to the Advisory Agency and Planning Commission regarding the Project.

I. THE PROJECT DESCRIPTION IS NOT STABLE AND FINITE

A. The Missing and Ever-Changing Specific Plan

For over two years, the community and neighbors around the Project site have been asking a simple question: what *is* the Project? And for more than two years, the City has not provided a consistent answer to that question. The Draft EIR did not include an accurate, stable, and finite project description. The Specific Plan, which *is the Project*, was not released to the public during the public review period. The Draft EIR supposedly evaluated a “conceptual” plan that the developer was not bound to build. As such the public did not and could not understand what might be developed and the City did not have an adequate project description upon which to base its evaluation of the potential environmental impacts of the Project.

Pursuant to CEQA, “[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193). “Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance.” (*Id.*, pp. 192-93). The City has failed this fundamental CEQA tenet.

The City has been consistent about one thing: the Project was and is the adoption of the TVC 2050 Specific Plan.² The Draft EIR refers to the Specific Plan and its supposed regulations over 270 times.

However, the Draft EIR did not include a copy of the Specific Plan for public review, even though the Specific Plan was necessary to guide the City’s environmental review and for the public’s understanding of the Project. The City’s planning website, which hosted several

² The opening sentence of the Project Description in the Notice of Preparation and Initial Study states “The Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the modernization and expansion of media production facilities within the Television City Studio campus.” The opening statement of the Notice of Completion and Availability of the Draft Environmental Impact Report states “The Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and modernization and expansion of media production facilities within the 25-acre Television City studio.” The first sentence of the Draft EIR’s Project Description states “The TVC 2050 Project (Project) would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and modernization and expansion of media production facilities within the approximately 25-acre Television City Studio studio....” The project description on the City’s website for the Project states “The Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 25-acre Television City studio (Project Site).” Topical Response No. 1 of the Final EIR states that “[t]he nature of the Project is a proposed specific plan and the Draft EIR evaluated a conceptual development scenario, as a specific development plan did not exist when the Draft EIR was prepared.”

other initial submittal documents, failed to provide the Specific Plan alongside the Draft EIR. As the City Planning Department’s own staff reports reflect, this refusal to provide the public with a copy of the proposed Specific Plan persisted despite repeated requests by the community to obtain the Specific Plan prior to and during the Draft EIR comment period.

It was not until October 2023 that the City Planning Department finally released to the public a “Preliminary Draft of the TVC 2050 Specific Plan.” This was more than a year after the Draft EIR was circulated and just a month before release of the Final EIR. And then, six months after that, in April 2024, the City released yet another modified version of the TVC 2050 Specific Plan. Thus, after failing to provide a copy of the Specific Plan during the Draft EIR comment period, in the almost two years after the Draft EIR comment period *closed*, the City has released two different versions of the Specific Plan. And none of the versions are consistent with what was analyzed in the Draft EIR.

This lack of transparency and the delayed release of crucial documents highlight the City’s failure to provide a clear and stable project description, a fundamental requirement under CEQA. Moreover, the Project analyzed in the Draft EIR is not consistent with the (now) proposed Specific Plan, rendering the EIR analysis for the Project (including the Specific Plan) inadequate under CEQA. The City must redo the environmental analysis to study the Project that is actually going to be built, and recirculate it for public review and comment.

B. The City Repeats the *Millennium Hollywood* CEQA Mistakes

The City is repeating the same mistakes that led to judicial rebuke of the City’s CEQA process in the *Millennium Hollywood* case: failing to provide an accurate, stable, and finite project description.

In *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, the Court of Appeal upheld the trial court’s decision that the City’s CEQA review of the Millennium Hollywood project was grossly inadequate due to the EIR’s failure to provide an accurate, stable, and finite project description. The EIR for the Millennium Hollywood project described several potential development scenarios without detailing the final arrangement, density, siting, or massing characteristics, ostensibly to offer the applicant “flexibility.” Instead, the EIR in the *Millennium Hollywood* case presented only an “illustrative scenario” to demonstrate a “potential development program.”

The Court of Appeal found this approach unacceptable. The Court rejected the City’s argument that analyzing and mitigating the worst-case scenario environmental effects sufficed under CEQA. By not providing a project description that evaluated what may actually be built, the EIR prevented effective public participation and informed decision-making.

Similarly, the City’s descriptions of the TVC 2050 Project fail to meet the requirement of a stable or finite project description. The opening line of virtually every description of the Project circulated by the City is the adoption of the TVC Specific Plan. (See *supra*, note 2). The Final EIR repeats that “[t]he nature of the Project is a proposed specific plan and the Draft EIR evaluated a conceptual development scenario, as a specific development plan did not exist when

the Draft EIR was prepared.” (FEIR, II-71). The TVC 2050 Specific Plan was not made available to the public as part of the Draft EIR. The inclusion of “illustrative and conceptual plans” (FEIR, II-73) in the Draft EIR, without the development regulations by which that plan could be developed, failed to provide the public with an accurate project description because it was repeatedly stated throughout the Draft EIR and on these “illustrative and conceptual plans” that the Project developer was not bound by those plans, and little other information was included. It was clear that the Municipal Code would not govern development of the Project, but what would take its place remained a mystery. The failure to provide in the Draft EIR a clear and stable project description cannot now be remedied by trying (and failing) to redefine the project through the most recent version of the TVC 2050 Specific Plan.

The City attempts to distinguish *Millennium Hollywood* by arguing that the Millennium Hollywood project involved an individual building development project rather than a specific plan project, suggesting that larger projects with greater impacts like the TVC 2050 Project can remain undefined while smaller projects must have clear descriptions.³

The City acknowledges its uncertainty about what will be built, stating it had to make a “good faith effort at forecasting what is expected to occur if the Project is approved.” (FEIR, II-73). The EIR makes clear that the City has no idea what may be built. In the same breath that the City acknowledges that “analyzing a set of environmental impacts, instead of analyzing the environmental impacts for a defined project, was not consistent with CEQA,” (quoting *Millennium Hollywood*) it states that “the Draft EIR also analyzed maximum impact scenarios” and “any future development ... which is beyond the scope of the impacts evaluated in the EIR, would be subject to additional discretionary City review and approval.” (FEIR, II-73). Thus, the City repeats the same error as in *Millennium Hollywood*. The City tries to absolve itself by “analyzing” a “Conceptual Site Plan” in addition to the “maximum impact scenarios” (i.e., “environmental impact envelopes.”). However, it is clear that “a specific development plan” did not exist when the Draft EIR was prepared.

The City tries to have it both ways. On the one hand, it distances the Project from the Specific Plan, noting that the Specific Plan is simply “an entitlement associated with the Project” included in a “list of the entitlements sought” and thus need not be “included in the EIR.” (FEIR, II-68). On the other hand, it states “the Project is a proposed specific plan ... as a specific development plan did not exist when the Draft EIR was prepared.” (FEIR, II-71). Which is it? The public still does not know.

Whether the Project is the establishment of a Specific Plan, which needed to be provided for public review and comment in conjunction with the Draft EIR, or a specific defined studio

³ The Millenium Hollywood project was almost 1.2 million square feet of development and involved multiple buildings and historic structures, not that dissimilar to the TVC 2050 Project. The approvals sought for the TVC 2050 Project are fundamentally not different than the approvals requested for the Millennium Hollywood project.

project that cannot be analyzed using “maximum impact scenarios,” the City did not comply with CEQA.

The EIR must be revised and recirculated to include an actual project description, including the Specific Plan with actual development regulations, and other related documents, and re-analyze all impact areas to understand the impacts of what will actually be built.

II. THE PROPOSED SPECIFIC PLAN IS NOT AS DESCRIBED IN THE STAFF REPORT AND THE EIR DOES NOT ACTUALLY REGULATE DEVELOPMENT

The proposed Specific Plan now being considered by the City (that was not available to the public during the Draft EIR review process) is basically a blank check for the development of up to 1,724,000 square feet of commercial development or more to be built either immediately or over a 20-year period, whatever the developer decides. The Project may include studios, or it may not. It is all up to the developer. The City Planning Department staff reports and the EIR describe requirements that are not consistent with the Specific Plan.

The Specific Plan would supersede the City’s Municipal Code regardless of whether its regulations are more restrictive or more permissive than the Code.

Contrary to other zones in the City, the Specific Plan does not enumerate permitted uses. Rather, the Specific Plan would allow any uses “consistent with” five broadly defined land use categories. The Specific Plan labels these five land use categories as “Studio Land Uses” and the staff reports and EIR say that the Project is a studio project. ***To be clear, there is nothing in the Specific Plan that requires actual studio uses on the Project site.***

The Specific Plan does not require that all of the five “Studio Land Uses” exist on the Project site. There is no requirement for operating studio uses. There is no requirement for media content creation to occur. Purely office and retail uses could be developed.

The five “Studio Land Uses” include General Office, Production Office, Production Support, Sound Stage and Retail. But do not be misled by the labels – at most a tangential relationship with anything related to media creation is required.

The City Planning Department’s staff reports state that “the production office and general office ...would be utilized to support the existing on-site studio and production uses only, and would not be leased out to unrelated third parties.” (CEQA Staff Report, p. A-33). The staff report for VTT-83387 similarly states that that the “permitted office uses would operate as ancillary uses” and “there is no intent by the Project to develop general office space unrelated to studio uses and operations.” (VTT-83387 Staff Report, Exhibit D.1, pp 26-27).

However, the office uses are independent land use categories and “General Office” is defined to include “general offices uses, which may or may not include those office uses associated with or in furtherance of Production Activity.” (emphasis added). So, General Office can be any office use.

Production Office is defined to include “those office uses associated with *or in furtherance of* Production Activity...” (emphasis added). Production Activity is defined to include the creation, development, production, acquisition, reproduction, recording, processing, editing, synchronizing, duplication, transmission, reception, viewing and other use of visual, digital, print and/or aural works, products, services, rights, and communications. Taken together, this means that any office that is “*in furtherance of*” any one of the above-listed activities would be considered “Production Office.” And the Specific Plan is silent on how the City would (or could) regulate that the office uses are being used “*in furtherance of*” any of those activities. There is no requirement that the Production Office use be directly related to Production Activity let alone Production Activity on the Project site. In effect, the Specific Plan would allow 1,250,000 million square feet of any office uses on the Project site. This represents the largest use by far on the Project site.⁴

If, as the City and applicant have stated, the office uses are to be ancillary and related to studio operations, then the Specific Plan must be revised to require a minimum amount of actual media content creation uses on the TVC site to support the office uses.

Production Support, which is only 215,440 square feet of the overall 1,724,000 million square feet allowed, includes uses only tangentially related to operation of a studio, such as “museum storage and display” and “retail associated with studio/production uses where goods are displayed, sold and/or services, including studio tours and related activities, and other similar uses.” So, Production Support space could be all museum, studio tours and retail space. Retail space should be included within the total floor area permitted for “Retail” under the Specific Plan.

Even the Sound Stage land use, which similarly is only 238,560 square feet of the overall 1,724,000 million square feet proposed under the Specific Plan, is not required to be used for movie or television filming. The Specific Plan defines it merely as “[a] Studio Land Use that includes permanent buildings for Production Activities and which may contain Set/Facades.” It does not exclude Production Office or Production Support uses (which are also structures for Production Activities) from being categorized as Sound Stage. As defined, the Sound Stage land use can include, for example, live audience shows, e-sports events, and concerts.

Essentially, the proposed Specific Plan would permit 1,724,000 million square feet of office and retail uses with only a subset of those uses possibly having a tangential relationship with any media content creation. Just because you call it Studio Land Uses does not make it so. The EIR did not analyze impacts from the broad range of uses allowed under the “Studio Land Uses” as defined.

⁴ As shown in Table II-9 of the Final EIR, General Office and Production office represent 74% of the Project square footage. Only 19% would be devoted to Sound Stage and only 6% to Production Support. And as discussed below, it is not clear those land uses would ensure the actual production of media on the Project site.

The Specific Plan also would allow by right a dozen ancillary uses without regulation of the location, quantity, duration, or operation of those ancillary uses. These “ancillary uses” include, for example, Cellular Facilities and Communications Facilities, Emergency Medical Facilities, Helipad, Infrastructure and Private and Public Utilities, Recreational and Fitness Facilities, and Special Events.

The EIR did not analyze these unlimited and unrestricted uses. For example, inexplicably the EIR claims that the helipad does not have to be analyzed because the proposed helipad uses will be consistent with prior helipad uses on site.

The Final EIR claims that the helipad will be at the same location and have five helicopter trips per year during the hours of 9:00 am and 9:00 pm. (FEIR Appendix 15). However, the Specific Plan says the helipad uses could be located “anywhere within the Specific Plan area” and includes no other regulation of helipad uses. It could be located immediately adjacent to the existing residential uses at Broadcast Center Apartments.

While allowing a virtually unlimited range of permitted uses, the Specific Plan includes minimal design and operational regulations. New building heights are based on five height zones with maximum heights ranging from 58 to 225 feet above a defined Project grade, rather than the Municipal Code definition of grade. Four of the five height zones allow the entire zone to be developed to the maximum height. Minimal building setbacks are provided, and active uses, including Basecamp, parking, and vehicle circulation, among others, are permitted in the setbacks.

The Specific Plan access regulations would allow unlimited large truck traffic on a narrow Collector Street (The Grove Drive) and private alley, and rideshare pick-up and drop-off at the private alley, increasing safety hazards to pedestrians, bicyclists, and passenger vehicles in conflict with City plans and policies. The Specific Plan must regulate the TVC site access consistent with the transportation analyses of the EIR.

In addition, while the staff reports and EIR describe the “Mobility Hub” as fronting and being accessed from Fairfax Avenue,⁵ the Specific Plan would allow the location of and access to the Mobility Hub to be anywhere on the TVC site for an indefinite period of time. The

⁵ “[A] Mobility Hub would be located on the southwest corner of the Project Site along Fairfax Avenue...” (CEQA Staff Report, p. A-14). “Regarding the Mobility Hub, as discussed on page 17 of the Erratum, the Mobility Hub operations would continue to be located within the southwestern portion of the Project Site.” (VTT 83387 Staff Report, Exhibit E, Letter from Applicant’s counsel to City Planning dated May 38, 2024). “Mobility Hub operations would continue to be located within the southwestern portion of the Project Site... Additionally, the shuttles would enter via the driveway south of the Mobility Hub (a right-turn movement from Fairfax Avenue) and exit via the signalize intersection at 1st Street (a left-turn movement to Fairfax Avenue). This would improve operations for all vehicles using the Mobility Hub and the 1st...” (Erratum Section 2.1.4, p. 17).

Specific Plan must be revised to require that the Mobility Hub access from Fairfax Avenue and 1st Street.

With the broad range of permitted uses that are inadequately regulated in the Specific Plan, the City should maintain strict oversight of the Project through discretionary development review processes. Instead, the Specific Plan exempts a number of activities from the definition of “Project,” including changes of use, and allows for administrative review of any Project that is in “substantial conformance” with the conceptual site plans and/or the minimal design guidelines.

The Specific Plan fails to regulate development of the Project site adequately and is not in conformance with public necessity, convenience, general welfare, or good zoning practice. The Planning Commission should recommend denial.

III. THE CITY FAILED TO RESPOND TO COMMENTS ON THE DRAFT EIR ADEQUATELY

In addition to the lack of a stable and definite Project description, the lack of regulation in the Specific Plan and failure of the EIR to analyze the range of permitted uses, the City failed to address many other significant issues raised in the comments on the Draft EIR adequately. (CEQA Guidelines §15088(c) [requiring “good faith, reasoned analysis” in response to comments, describing disposition of significant environmental issues raised and reasons why specific suggestions were not accepted; “[c]onclusory statements unsupported by factual information will not suffice.”]; *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 940; *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 878). Despite the numerous concerns highlighted by hundreds of community members, the Final EIR does not provide sufficient responses or revisions to rectify the deficiencies identified in the Draft EIR. The following are just a few of the key issues that remain unresolved in the Final EIR.

The Project floor area excludes key areas such as the basecamp, outdoor production area, and underground spaces, leading to a flawed assumption that impacts would decrease solely based on a reduction in floor area. This issue affects several impact areas studied in the EIR, including air quality, greenhouse gas emissions, and energy use, and must be corrected to provide an accurate estimate of the impacts from the Project. The City’s response to this issue in Topical Response 2 of the Final EIR, claiming that all potential environmental impacts are accounted for regardless of whether they are considered to be within the definition of floor area, is belied by the fact that the Errata assumes impacts would decrease based solely on a decrease in Project floor area. Moreover, the permitted uses are not constrained in any meaningful way by the Specific Plan. This makes it impossible to identify or analyze the possible impacts of the Project accurately.

The Final EIR fails to address potential vehicle queueing on The Grove Drive. If cars and trucks entering the site queue on public streets, they could create pedestrian safety hazards, increase cut-through traffic in residential neighborhoods, and impact emergency response times. The Final EIR merely states that queueing on The Grove Drive would not increase more than existing conditions because drivers could enter the site from Beverly or Fairfax. **First**, since there

is no existing driveway on The Grove Drive, and the proposed Project now includes two new driveways on The Grove Drive, it is factually inaccurate to suggest that queuing on The Grove Drive would not increase when there is zero today. **Second**, there is no explanation of whether or how drivers entering from Beverly or Fairfax driveways could reach the proposed parking garage located adjacent to The Grove Drive. In addition, there is no analysis of how drivers circling on The Grove Drive, Third Street, Fairfax, and Beverly, would increase traffic and VMT impacts. The Erratum also added a second driveway on The Grove Drive, adding to the concern that the Project is a moving target and there has not been a comprehensive analysis of traffic and safety impacts from these iterative changes. In addition to these potential traffic and safety impacts that the City failed to study, vehicle queueing has potential air quality and greenhouse gas emission impacts that are not analyzed in the EIR.

The VMT analysis is flawed. It does not assume the worst-case maximum allowable buildout for each of the five uses, and the assumptions about employees on-site and guests are questionable. Much of this flawed analysis is a result of the EIR's reliance on an unstable project description, and flawed assumption regarding trip lengths that are unsupported. (CEQA Guidelines §15064.3(b)(4)). The assumed trip lengths are flawed because they improperly rely on the City's VMT calculator, guidance for which states that it is not designed to evaluate VMT impacts of land use plans (such as Specific Plans), or of "regional-serving retail projects, entertainment projects, or event centers." The VMT analysis is fundamentally flawed and must be redone based on an accurate, stable project description, and using accurate trip length calculations for the proposed uses.

The impacts on historic resources such as the Gilmore Adobe and Farmers Market are dismissed without sufficient mitigation measures. Because the Project description is unstable, and the exact locations or heights of buildings are unknown, it is impossible for the Final EIR to adequately address potential impacts to these historic resources.

The cumulative impacts analysis does not adequately consider a 20-year buildout scenario. Instead, the EIR identified related projects **assuming a buildout year of 2026** (which is less than two years away and it is not feasible to achieve such a buildout), failing to consider potential impacts from foreseeable development in the area through 2043. The EIR's conclusion that the Project's contribution to cumulative impacts would be less than significant is not supported by substantial evidence.

Due largely to the inadequate and unstable Project description, the EIR's analysis of alternatives fails to include a meaningful consideration of alternatives because it is impossible to compare the Project to alternatives when it is still not clear what exactly the Project is. (CEQA Guidelines §15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392). Comments on the Draft EIR suggested feasible alternatives to reduce the Project's significant impacts from noise and vibration and air quality, as well as additional significant adverse impacts that the EIR failed to disclose, yet these were dismissed in the Final EIR without adequate analysis. The reduced density alternatives and environmentally superior alternative were rejected in the EIR as failing to meet Project objectives, yet less impactful alternatives need not meet all project objectives if they are feasible and would accomplish most objectives and

LATHAM & WATKINS LLP

substantially lessen the significant environmental effects of a project. (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1370 n.19).

These examples highlight the City's failure to resolve critical issues raised during the Draft EIR comment period, resulting in an incomplete and legally insufficient environmental review. The City must revise and recirculate the EIR to comply with CEQA's requirements.

Based on the foregoing, we respectfully request that the Planning Commission recommend denial of the Project's requested actions and vacate the Advisory Agency's certification of the EIR. On behalf of our client, we thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Maria P. Hoyer', is positioned above the typed name.

Maria P. Hoyer
of LATHAM & WATKINS LLP

30+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:

Items 09-11:

Case Nos. VTT-83387, CPC-2021-4090, CPC-2021-4089

Subject Line:

Concerns for Redevelopment of Television City studio at Beverly and Fairfax

Message:

Councilmember Yaroslavsky and Planning Department:

I am writing to express my concern about the redevelopment of Television City at Beverly and Fairfax.

We believe there can be a win-win solution that allows for a viable studio without undue burden on the community. The developer's proposed project is just 25% studio and 75% office compound.

Eliminating the surplus 550,000 square feet of office space unrelated to studio use would honor the developer's stated intention to revitalize the studio and their commitment to "being a good neighbor for the long term."

I am particularly concerned about the following features:

I'm concerned about the traffic that will inevitably come with the large redevelopment project. Large construction equipment will clog roads. Using alternative means of transportation, like public transit, is unrealistic at this time, and employees who depend on major streets would rely on cutting through residential neighborhoods to find parking and shortcuts.

I'm concerned about the immense scale of the redevelopment project. With the project spanning nearly two million square feet, its impact on residential communities is alarming. It's not just the sheer size, but also the potential disruption to local services and street life that worries me deeply.

I'm concerned about the potential environmental repercussions of a project of this magnitude on our community. Given that 20-ton trucks will be constantly transporting dirt, waste, and hazardous materials, over a 20-year construction timeline, coupled with the emissions they produce, it's inevitable that the environmental quality and the residents' quality of life in Beverly-Fairfax will be negatively impacted.

The existing infrastructure and emergency response services currently in place are simply not adequate to support a development the size of TVC 2050. The Environmental Impact Report admits traffic and project uses WILL impact response times for fire, medical and police response and increase the demands for these services.

We're already exhausted by the noise and disruption of special events at the Motion Picture Museum. The TVC proposal sets no limits at all on special events - or on 24/7 operation of a helipad for VIPs.

Everything about this is awful and a bad idea, please please please DO NOT do this.

Thank you for your time and attention to this important issue.

DAY OF HEARING SUBMISSIONS



Department of City Planning

City Hall, 200 North Spring Street, Room 272, Los Angeles, CA

September 10, 2024

TO: City Planning Commission

FROM: More Song, City Planner
Department of City Planning, Major Projects

TECHNICAL MODIFICATIONS TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2017-5423-VZC-HD-CUB-CUX-SPR LOCATED AT 555 EAST UNIVERSAL HOLLYWOOD DRIVE

The following technical modifications are presented for your consideration to be incorporated into the Staff Recommendation Report at the City Planning Commission meeting of September 12, 2024, related to Item No. 05a on the meeting agenda. Deleted text is shown in ~~strikethrough~~ and added text is shown in underline.

Revised Exhibit A

“Q” Qualified Condition No. 1 references the architectural plans in Exhibit A dated June 17, 2024; however, the Exhibit A submitted for consideration should be dated September 12, 2024, as referenced in the Staff Recommendation Report. A revised Exhibit A is attached herein with a new stamp date of **September 12, 2024** on each page.

Page Q-1, Q Condition No. 1, Proposed Uses

“Q” Qualified Condition No. 1 inadvertently omitted the new fitness center as part of the proposed uses for the Project. Therefore, in conjunction with the updated Exhibit A stamp date, Planning recommends the Condition be modified as follows.

1. **Site Development.** The use and development of the property shall be in substantial conformance with the plans submitted with the application and marked Exhibit A, dated ~~June 17~~September 12, 2024 (hereafter referred to as Exhibit A) and attached to the subject case file. No change to the plans (except as conditioned) will be made without prior review by the Department of City Planning, Major Projects Section and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the LAMC or the Project conditions. The project shall be in substantial conformance with the following project description:
 - a. Retention of the existing 24-story hotel building;
 - b. Development of new 18-story hotel expansion building with 395 new guest rooms;
 - c. Development of approximately 12,000 square feet of restaurant space, approximately 5,000 square feet of bar space, an approximately 9,000 square-foot spa, an

- approximately 2,700 square-foot fitness center, and approximately 3,400 square feet of new meeting room space; and
- d. Total new development not to exceed approximately 300,000 square feet.

Page C-2, Entitlement Condition No. 4

Condition No. 4 inadvertently prohibited occasional fashion shows for charity events and other such events that the existing hotel currently hosts and may be proposed in conjunction with the proposed Project. Therefore, Planning recommends that Entitlement Condition No. 4 be modified as follows:

4. **Music / Live Entertainment.** Music and live entertainment are permitted within the hotel and ancillary uses and subject to the following limitations:
- a. Live entertainment is limited to ensembles of a maximum of three people.
 - b. DJs and amplified music are permitted. Amplifiers are limited to no more than one amplifier in any individual area (e.g. each restaurant, lounge, meeting room, etc).
 - c. There shall be no topless entertainment, ~~male or female performers or fashion shows~~ anywhere on the premises.

All proposed changes are entirely administrative and/or regulatory and do not substantially alter any portion of the Staff Recommendation Report, including analysis, findings, and other conditions of approval.



Department of City Planning

City Hall, 200 North Spring Street, Room 272, Los Angeles, CA

September 11, 2024

TO: City Planning Commission
FROM: Paul Caporaso, City Planner

TECHNICAL MODIFICATIONS TO STAFF RECOMMENDATION REPORT AND/OR EXHIBITS AND RESPONSE TO ADDITIONAL PUBLIC COMMENTS FOR CASE NOS. VTT-83387-1A, CPC-2021-4089-AD-GPA-ZC-HD-SP-SN and CPC-2021-4090-DA LOCATED AT 7716-7860 BEVERLY BOULEVARD

TECHNICAL MODIFICATIONS

The following technical modifications are presented for your consideration to be incorporated into the Staff Recommendation Report and Exhibits related to Item Nos. 10 and 11 on the meeting agenda, for the City Planning Commission meeting of September 12, 2024. Deleted text is shown in ~~strikethrough~~ and added text is shown in underline.

CASE NO. VTT-83387-1A

Following are typographical errors to be corrected in the Appeal Staff Recommendation Report and Appendix D.1 of the Report.

APPEAL STAFF RECOMMENDATION REPORT:

Page A-2, VTTM Topical Appeal Response: Adequacy of VTTM and VTTM Process (2nd Paragraph)

Replace reference to Exhibit B for the Memorandum attached to the Appeal Report as Exhibit D.

APPENDIX D.1 – APPEAL POINTS AND RESPONSES, PREPARED BY EYESTONE ENVIRONMENTAL

Page 1 (Paragraphs 2 and 3); and Page 4, Appeal Response 1-1 (2nd Paragraph); Page 76, Appeal Response 4-35 (1st Paragraph)

Replace all references to Exhibit D.2 with Exhibit E of the Appeal Report.

Page 26, Appeal Response 2-13 (1st Paragraph)

[...] In addition, collectively, the permitted ~~office~~ uses would ~~operate as ancillary uses and~~ help facilitate and support the studio and the primary studio land uses that already occur on-site. General office, as defined by the Specific Plan, is a core and necessary land use required by

modern media tenants, and all major studio modernization projects generally provide an increase in the use over the existing condition [...]

Page 33, Appeal Response 2-21 (1st Paragraph)

[...] The permitted uses, including the office uses, would ~~operate as ancillary uses and~~ help would facilitate and support the continued operation of the studio.

Page 108, Appeal Response 7-3 (1st Paragraph)

Contrary to this assertion, the permitted office uses ~~would operate as ancillary uses and help facilitate and~~ exist at the site currently and would continue to support the studio and the primary studio land uses that already occur on-site.

CASE NO. CPC-2021-4089-AD-GPA-ZC-HD-SP-SN

Following are typographical errors to be corrected in the Project Analysis, Findings, and Exhibit B of the CPC Staff Recommendation Report.

STAFF RECOMMENDATION REPORT - PROJECT ANALYSIS

Page A-9, Phasing (1st Paragraph)

Project buildout may occur as quickly as in one phase, with a total construction period of approximately ~~30~~ 32 months, or in a phased approach over future years [...] The Project Applicant is seeking a Development Agreement with a term of 20 years, ~~which could extend the full buildout year to approximately 2045.~~

Page A-10, Pedestrian and Streetscape Improvements (1st Paragraph)

[...] Each street-facing frontage contains a setback (“frontage”) area where no building ~~or fencing~~ can be installed, which would provide additional publicly accessible space within the private property adjacent to the public sidewalk. Fencing with at least 50 percent transparency would be allowed within the setback areas. In addition, each setback area along Fairfax Avenue, Beverly Boulevard, and The Grove Drive contains a “project gateway” public plaza area further inset into the Project Site and ranging in size from 225 to 900 square feet [...]

Page A-11, Pedestrian and Streetscape Improvements, Fairfax Avenue (1st Paragraph)

[...] Additionally, ~~a 675 square-foot two~~-publicly accessible gateway plazas ~~is~~ with a combined area of 900 square feet are set to be introduced as ~~a~~ welcoming points and to enhance the area’s accessibility [...]

Page A-12, Pedestrian and Streetscape Improvements, Beverly Boulevard (1st Paragraph)

[...] Beverly Boulevard would feature a ~~900~~ 675 square-foot gateway plaza and entrance facing the iconic red canopy and Primary Studio Complex to highlight the entrance and historic building elements of the site.

Page A-13, Pedestrian and Streetscape Improvements, The Grove Drive (1st Paragraph)

[...] Improvements include an 11-foot-wide public sidewalk and an adjacent **43**-foot-wide landscaped area on private property. Additionally, a new traffic signal and enhanced pedestrian crossing would be installed at the ~~intersection with the Shared Southern Access Drive~~ **proposed entry along The Grove Drive**, creating a vital link between the Project Site and key landmarks, as it would facilitate safer pedestrian access to The Grove to the west, and both The Holocaust Museum and Pan Pacific Park to the east [...]

Page A-20, Permitted Uses (1st Paragraph)

Uses permitted under **Section 5.1** of the Specific Plan include studio uses and ancillary functions to the studio, as well as publicly accessible ground-floor retail spaces ~~along Fairfax Avenue~~ [...]

Page A-23, Streetscape Improvements (1st Bullet Point)

- Provide a 15-foot-wide sidewalk in accordance with ~~Modified~~ Avenue II Standards of the Mobility Plan on Fairfax Avenue, with 10 feet being provided within the public right-of-way, and [...]

Page A-26, Architectural Ledge Signs (1st Paragraph)

[...] Up to ~~six~~ **12** architectural ledge signs, with individual channel letters and/or a prefabricated image, would be attached to a horizontal projection forming a narrow shelf on a wall or architectural projection [...]

Page A-27, Supergraphic Signs (2nd Paragraph)

[...] The Conceptual Sign Plans (Appendix A of the Sign District) set standards for the number and location of any exterior-facing Supergraphic Signs to be installed in the Specific Plan area which, as proposed, would include ~~nine~~ **six** Supergraphic/Wall Signs fronting Fairfax Avenue, ~~four~~ **two** fronting the Southern Shared Access Drive, ~~nine~~ **six** fronting The Grove Drive, and ~~seven~~ **three** fronting Beverly Boulevard [...]

STAFF REPORT RECOMMENDATION REPORT - FINDINGS

Page F-22, Specific Plan Dedications and Improvements (3rd Paragraph, 1st & 2nd Bullet Point)

- Provide a 15-foot-wide sidewalk in accordance with ~~Modified~~ Avenue II Standards of the Mobility Plan on Fairfax Avenue with 10 feet being provided within the public right-of-way, and 5 feet being provided within the proposed sidewalk easement along Fairfax Avenue [...]
- ~~Provide a 15-foot-wide sidewalk in accordance with Modified Avenue II Standards of the Mobility Plan on Fairfax Avenue partially in the public right-of-way, and partially within a proposed 5-foot-wide proposed sidewalk easement along Fairfax Avenue;~~

EXHIBIT B – TVC 2050 SIGN DISTRICT

Section 7.E, General Requirements, Illumination

Add the following after Section 7.E.3, and renumber the remainder of the section accordingly.

- 4. Green Code. All light sources, including illuminated signage, shall comply with CALGreen (Part 11 of Title 24, California Code of Regulations) and the Green Code of the City of Los Angeles.**

Section 8.A.3. Architectural Ledge Signs, Number and Location

Number and Location. A maximum of ~~six~~ **12** Architectural Ledge Signs are permitted. Architectural Ledge Signs shall be installed in substantial conformance with Appendix A (Conceptual Sign Plans), and are only allowed at automobile and pedestrian access points.

CASE NO. CPC-2021-4090-DA

Following are typographical errors to be corrected in the Exhibit A of the CPC Staff Recommendation Report.

EXHIBIT 1 – DRAFT DEVELOPMENT AGREEMENT ORDINANCE

Introductory Sentence

An ordinance authorizing the execution of the development agreement by and between the City of Los Angeles **and** Television City Studios, LLC, a Delaware limited liability corporation, relating to real property ~~in the~~ **located at** 7716-7860 West Beverly Boulevard.

Section 1(a)

(a) It is consistent with the City's General Plan, policies and programs specified in the ~~Central City~~ **Wilshire** Community Plan and is compatible with the uses authorized in, and the regulations prescribed for, the zone in which the real property is located; [...]

RESPONSE TO ADDITIONAL CORRESPONDENCE FOR CASE NOS. VTT-83387-1A, CPC-2021-4089-AD-GPA-ZC-HD-SP-SN, AND CPC-2021-4090-DA

Following release of the Staff Reports, additional public comments both in support and opposition to the Project were received. The following parties provided letters in opposition to the Project:

- 1) Holland & Knight, LLP, on behalf of the A.F. Gilmore
- 2) Latham & Watkins LLP on behalf of The Grove, LLC
- 3) Park La Brea Impacted Residents Group
- 4) Sheppard Mullin Richter & Hampton LLP, on behalf of Mayer Beverly Park Limited Partnership
- 5) Fix the City
- 6) Carstens, Black & Minter, LLP, on behalf of Save Beverly Fairfax

In addition, a Form Letter expressing concerns for the redevelopment of the TVC studio was signed by over 30 members of the public.

Issues identified in these letters that were previously raised generally cover: the validity of the VTTM, the scale and design of the development, public health impacts, lack of housing on-site, consistency with the Wilshire Community Plan, enforceability of Conditions of Approval, helipad operations, environmental impacts analyzed in the EIR, the stability of the Project Description in the EIR, potential non-CEQA transportation impacts, proposed uses and the flexibility of the Specific Plan, the provisions included in the Development Agreement, OPR Guide to Specific Plan, court cases

applicable to the Project, and the conceptuality of the Project plans, and all of which have been addressed in the Appeal Staff Recommendation Report prepared for Case No. VTT-83387-1A, and the Final EIR, dated November 21, 2023.

Comments that were not previously raised include those listed below, followed by Staff Responses:

Holland & Knight, LLP, on behalf of the A.F. Gilmore

- The Statement of Overriding Considerations (SOC) is deficient because it relies on the Project objectives to conclude that achieving those objectives alone is sufficient to override the significant environmental impacts.

The SOC was completed in accordance with CEQA Guidelines Section 15093. The Letter of Determination (LOD) for VTTM No. 83387, specifically on pages 105-107, included details about how the various benefits of the Project outweigh the short-term significant impacts. Additionally, economic reports prepared by Los Angeles Economic Development Corporation (LAEDC) were submitted as part of the administrative record and provide supporting analysis on the economic impacts of the Project.

- Holland & Knight LLP specifically asserts that the case of *Kleist v. City of Glendale* is applicable to the Project and that the *Westside Los Angeles Neighbors Network v. City of Los Angeles* (August 19, 2024, BS320547) case is not.

In *Westside Los Angeles Neighbors Network v. City of Los Angeles*, the court found that an entity authorized to adopt a portion of a multi-approval project was a “decision-making body” to whom the lead agency could delegate its authority to certify an EIR under Public Resources Code (PRC) Section 21151 and CEQA Guidelines Section 15090(b). In *Kleist v. City of Glendale*, the court considered a different issue – specifically, whether a decision-making body could delegate its authority to an entity that was not a decision-making body for a project. *Kleist* was not applicable in *Westside* and is not applicable here, as the DAA was the decision-maker for the VTTM, which is one of the Project’s multiple approvals, and therefore had authority to certify the EIR. This is consistent with LAMC Section 13B.11.1(D)(2) (CEQA Decisions – Decision Maker), which states: *Any entity authorized to decide a Project approval or appeal of an approval under this Article is the decision maker for purposes of compliance with CEQA. When a Project has more than one approval, the decision maker on the initial approval, or the appeal of the initial approval, determines the CEQA Clearance for the Project, subject to any available CEQA appeal to the City Council under Subsection F. (Appeals of CEQA Decisions) of this Section and all other requirements of CEQA and the CEQA Guidelines.*

Park La Brea Impacted Residents Group

- Hackman Capital Partners does not produce entertainment media content but is a real estate company.

While not a CEQA or entitlement-related issue, Hackman Capital Partners is a global owner and operator of studios, and the proposed uses provide for the continued operation of the Project Site as a studio use.

- Section 5.1.D of the Specific Plan allows for any use.

Section 5.1.D (Uses Not Listed) is a standard provision that is consistent with other City-adopted specific plans, including, among others, the District Noho Specific Plan, and would

only allow uses that are not listed in Section 5.1 (Land Use and Development Regulations) of the Specific Plan, upon determination by the Director pursuant to LAMC Section 13B.4.6 (Specific Plan Interpretation) that such uses are similar to no more objectionable to the public welfare than the permitted uses of the Specific Plan.

Sheppard Mullin Richter & Hampton LLP

- The Project would not be bound to comply with new renderings and graphics.

Pursuant to Section 4.2.E (Project Compliance) of the Specific Plan, only development that substantially complies with the Specific Plan, including but not limited to Initial Development Plans (Appendix A) and with the Design Standards (Appendix D), would be approved administratively; otherwise, discretionary approval and additional CEQA review would be required.

Carstens, Black, & Minter, LLP

- Internal security barriers may have adverse historical and aesthetic resources impacts.

Pursuant to the Specific Plan, all new development must comply with Specific Plan requirements, including but not limited to the Viewshed Restoration Area objective standards, Project Parameters, and other requirements set forth to ensure historical resources are not significantly impacted. In addition, per SB 743, the Project's impacts associated with aesthetics would be less than significant.

- The SOC does not provide the reasons to support the lead agencies action.

The SOC was completed in accordance with CEQA Guidelines Section 15093. Refer further to the Staff Recommendation Report for Case No. CPC-2021-4089-AD-GPA-ZC-HD-SP-SN for specific details about how the benefits of the Project outweigh the short-term significant impacts, in addition to the supporting LAEDC economic reports.

Latham & Watkins LLP

- The Specific Plan does not enumerate permitted uses and there is no requirement for operating studio uses.

Refer to Section 5.1 of the Specific Plan, which sets forth the limited studio-related land uses permitted as part of the Project. Section 5.1.D is a standard provision that matches other standard City-adopted specific plans, including, among others, the District NoHo Specific Plan (also Section 5.1.D therein). Section 5.1.D would only allow uses that are similar to the permitted studio uses and not more objectionable to the public welfare, upon determination by the Director pursuant to LAMC Section 13B.4.6 (Specific Plan Interpretation). The primary objective of this Project is to continue the existing studio and to implement the Initial Development Plans for studio uses.

The additional public comments addressed herein do not include any substantial claims or evidence contrary to the information included in the EIR, Staff Appeal Report, or the Staff Recommendation Reports. As such, these comments are noted for the record and do not require any additional analysis or response.

Dear Mark,

We are very excited that plans to build the 395-room hotel addition adjacent to the Hilton Universal City Hotel are now moving forward through the city process and City Council.

The addition of these rooms is so important to Los Angeles as we continue to focus on growing demand for domestic and international travel within the next year to pre-pandemic levels.

The timing of this addition is also critically important as Los Angeles prepares for the next decade of major sporting events that includes the World Cup in 2026 and the 2028 Summer Olympics and other world-watching events nearly every year that of course generates increased interest in visiting Los Angeles from countries around the world.

Another important aspect is the close proximity of this project to one of LA's most popular attractions, Universal Studios Hollywood, which is a compelling draw for domestic and international visitors and a driver to Los Angeles, and particularly important to the San Fernando Valley business communities.

Tourism is one of the top five employers and one of the leading economic drivers for Los Angeles, thus continued investment in LA's tourism infrastructure is essential, so we applaud locally based Sun Hill Properties for making such a significant investment to elevate Los Angeles' appeal as a welcoming destination to attract more visitors from around the world.

Again, we are excited plans are moving forward and keep us posted on timing as important projects like this helps to position LA as ever-changing and always improving destination.

Patti

Patti MacJennett
Chief Industry Relations Officer

LOS ANGELES TOURISM & CONVENTION BOARD
633 West 5th Street, Suite 1800, Los Angeles, CA 90071
discoverlosangeles.com
O +1 213 236 2360
M +1 213 280 6800





September 11, 2024

Chuanzhe Song
Los Angeles City Planner
200 N. Spring Street
Los Angeles, CA, 90012

SUBJECT: Case Number: ENV-2017-5424-EIR: Hilton Universal City Project – SUPPORT

Dear City Planner Song,

The Valley Industry & Commerce Association (VICA) ardently supports the proposed expansion of the Hilton Universal. This expansion, which includes the addition of 395 new rooms along with enhanced dining and leisure facilities, represents a significant investment by Sun Hill Properties into the future of Los Angeles, aligning with the city's economic and touristic aspirations, especially in preparation for the 2028 Summer Olympics.

The Los Angeles Tourism and Convention Board's forecasts indicate that Los Angeles is on track to welcome approximately 50 million visitors this year, nearly recovering to pre-pandemic levels, with a projected 31 million hotel room nights sold in 2023. The expansion of Hilton Universal is crucial to meet this increasing demand and will bolster the Valley's capacity to accommodate the surge in tourism.

Furthermore, the project is expected to generate substantial economic benefits during both its construction and operational phases. The construction phase is anticipated to create over 900 jobs within the San Fernando Valley. Once completed, the expansion will not only introduce hundreds of permanent new jobs but is also projected to produce over \$6 million annually in city revenues.

The Hilton Universal stands as a prominent figure in the hospitality sector of San Fernando Valley and is integral to our community's vibrant future. We fully endorse this expansion for its potential to amplify local economic growth and improve the hospitality infrastructure necessary for our region's success.

We urge your support for this transformative project.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Waldman", with a long horizontal flourish extending to the right.

Stuart Waldman
VICA President

HERITAGE ■ PROPERTIES

To: City Planning Commission
Mtg Date: September 12, 2024
Case #: CPC-2024-2616-CA
ENV-2024-2617-CE
Re: Redevelopment Plan Implementation-Major Policy Changes, re:code Procedures Changes

The ordinance proposed here has had virtually no public involvement, because it is unintelligible to the citizens affected. It is likely unintelligible to the Commission. The Staff Report fails to make anything clear --where this applies, why, when, and how. It is a jargon-heavy mystery.

This item 5c should be continued and remanded back to Staff.. It is too unclear. It is NOT urgent. It appears that the goal is to “transition” from “old zoning code” procedures to new “re:code” procedures in Redevelopment Areas—affecting 20% of the overall land area of our City.

After many decades of land use in CRA redevelopment areas being administered by that autonomous agency, in November 2019 that “zoning” authority was sent back to the LA City Council. CRA’s Land Use procedures were “transferred” to City Planning in what they called their “Clean Up” Ordinance # 186,325. Those procedures were synchronized with the existing Zoning Code, Community Plans, and entitlement rubric. It appears now that City Planning wants to transition to the new “re:code” rubric.

Position: I object to this current initiative for 5 reasons:

1. **Hidden major policy changes Page A3-A5:** This Case is mostly a quiet and boring “transfer” of dull administrative procedures from our “old” Zoning Code to the “new” “modern” Code. But 2 1/2 pages of the 157 pages holds a massive “policy change”, making local laws supreme over State law. This is an error and has significant consequences.
 - a. Judge Arguelles ruled in Case # 34-2020-80003462-CU-WM-GDS that the City of Los Angeles is not able to use local incentives to exceed Redevelopment Plan densities. However, on page A-5 bullet 2 the City attempts to moot that case.
 - b. In that case City staff admitted to the court of City errors in multiple major entitlements cases such as Crossroads. to date nothing has been done to fix those.
 - c. Our City’s continuing drumbeat to induce housing growth without ensuring normal improvements to infrastructure is shifting the burden of streets, sewers, electricity, etc on to us current taxpayers and ratepayers in a hidden way.
2. **The public has been excluded from participation in this Case because it is unclear WHAT it is, and WHERE and WHEN these procedures go into effect:**
 - a. **WHERE:** A simple map of affected areas is missing. Normally the public is alerted to where a Case is located that is coming to Commission by an address, a designated area, or a map. Page A-2 has a reference to some parts of Downtown being excluded and others included.
 - b. **WHAT:** A simple chart comparing current code text and a summary of procedural changes is missing.
 - c. **WHEN** these procedures go into effect is “talked” about but so effectively obfuscated that when this gets implemented is a mystery
 - d. My personal interest is in the Hollywood Community Plan. How these administrative procedures affect the large redevelopment area in central Hollywood is un-addressed. When that Community Plan Update was approved in 2023, it contained in Exhibit I a draft ordinance to cancel the entire

Redevelopment Plan land use; this was was deceptively called an “amendment” . No Redevelopment Plan Amendment procedures were followed then as described in State law. Whether and how this case is supposed to pertain to Hollywood is a mystery.

3. **Director Authority:** Whenever Director authority over a discretionary action is added into our zoning, the procedure must be very clear regarding public notice, findings, etc
4. **EIR Categorical Exemption is unacceptable :**
 - a. There is no clear “project” for environmental clearance.
 - b. When the “Transfer” or “Clean Up” Ordinance was passed in 2019, the ongoing legal effect of existing Redevelopment Plan Mitigations and Mitigation Monitoring Plans and individual project EIR Mitigations wasn't recognized.. In Hollywood, the protections for historic buildings were in that Mitigation Plan and should still be in force. The cancellation of these had to be analyzed in the EIR.
 - c. The prior Transfer Ordinance had inadequate environmental review.
5. **Fees:** When the Transfer or Clean Up Ordinance was passed, it included major fees such as a \$6,500 even for a single family plan review. CRA had done these for free. These fees were disproportionate and a mistake, and fees in general are unclear in this revised version.

Background: Redevelopment areas were generally located in older more developed parts of the City (Koreatown, Downtown, Hollywood, South Central, etc.) Redevelopment had a noble aim—returning local taxpayer dollars to their original locale through “tax increment funding”, collecting and disbursing our own local tax dollars to reverse blight. For decades, tax increment funded affordable housing in California, and its loss (not zoning) is the major cause of reduced publicly-funded affordable housing construction.

The Land Use Plans and functions of these Redevelopment Plans were a Section (usually Sec 5) of the Los Angeles Redevelopment Plans; by State law they could not be more permissive than zoning. They were meant to ensure that growth and improvements were controlled at a finer scale than City Planning and Zoning could achieve—and controlled with a purpose. For example, for Hollywood, for over 30 years all responsibilities for identifying and protecting over 1,000 historic resources (other than CHMS) was handed over to the Redevelopment Agency.

The land use obligations of those Redevelopment Plan—such as obligatory localized traffic and parking deficit studies, environmental review, urban design plans, and historic building protections—should have also had specific procedures for compliance as a central part of the transfer. So far that hasn't started.

I incorporate into these comments all comments made previously for the Transfer Ordinance and the Hollywood Community Plan-- made by myself or other parties. I reserve the right to add comments. I encourage City Planning to edit this Staff Report and present this subject to the public in such a way as to make it intelligible. If the purpose has to do with Downtown, that Community Plan had vigorous public participation and those citizens should certainly be notified. Ditto for affected Council areas and their Community Plans.

Respectfully submitted





Support for "TVC 2050" / CBS Studios project

1 message

Urban Growth Advocates <urbanization.advocates@gmail.com>
Reply-To: Urban Growth Advocates <urbanization.advocates@gmail.com>
To: cpc@lacity.org

Thu, Sep 12, 2024 at 9:16 AM

Dear Sir or Madam,

First and foremost: I am a local resident, and I wholeheartedly **SUPPORT** the "TVC 2050", a.k.a. "CBS Studios Improvement" project.

Currently, the CBS studios -- and all of the surrounding streets -- present just a bleak, utilitarian, and hostile environment, with grossly outdated infrastructure and lack of even basic (!) Urban design guidelines. Most certainly, this is not what the City of Angels should be famous for! Thankfully, the proposed TVC 2050 project aims to change all that. It will improve the entire neighborhood in a big way; it will transform the currently outdated CBS Studios into a modern, world-class area -- making this large portion of the Fairfax District pedestrian-friendly and family-oriented. That's in addition to creating thousands of jobs. All in all, **this project will be a Win-Win situation!**

One piece of advice I would like to offer, though (as discussed with some of the representatives): The sidewalks adjacent to the project area should have Decorative Covering / Pavers. Sadly, the City of L.A.'s design guidelines are outdated, and the Urban Design Studio has failed to update the "Walkability" concept, thus far. By the way, recently I met with the L.A. Mayor's office staff, and they fully agreed.

The CBS 2050 project should have completely revamped sidewalks - specifically **with Pavers**. Otherwise, we will be back to "square one". Remember: the naked concrete & cement (which is current state) deters walkability, due to having zero aesthetics and gloomy, utilitarian appearance. On the other hand, Pavers actually attract pedestrian activity. It's no wonder: pavers have been successfully used all over the world, including most of our U.S. cities; Los Angeles is the only city lagging behind.

Additionally, I've been in-touch with the BOE. And while there are, indeed, certain restrictions on pavers, there are still plenty of options and opportunities for developers on successful installation of pavers. Therefore, the developer for the TVC 2050 should work closely with the City's BOE -- and install at least some (!) sort of decorative covering / pavers for this project on sidewalks, especially on Fairfax Avenue and Beverly Blvd. All in all, it's time to transform L.A. from its current notorious "Concrete Jungle" into a world-class, walkable city!

Thank you for reviewing my comments.
Once again, I urge the City to endorse the project!

Best regards,

--

Alek Friedman, ADVOCATE

Urban Development / Smart Growth

Beautification Committee Member (former),

Central Hollywood Neighborhood Council

☎ 323 . 465 . 8511 Day/Office

☎ 213 . 999 . 1273 Cellular

www.ProgrammingAndImaging.com

[LinkedIn.com/in/FriedmanAlexander](https://www.linkedin.com/in/FriedmanAlexander)

CONFIDENTIALITY NOTICE:

This information, with any attachments, is confidential and is intended strictly for the individual or entity addressed herein. Any unauthorized review, dissemination, distribution, disclosure, copying, or other use of this information is prohibited. If you are not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, and/or if you received this e-mail in error, please reply to the sender immediately, and delete this material, including any attachments, from your computer. Thank you.



KATY YAROSLAVSKY
COUNCILWOMAN, FIFTH DISTRICT

September 11, 2024

Los Angeles City Planning Commission
201 N. Figueroa Street
Los Angeles, CA 90012

RE: Proposed Television City Project at 7716-7860 Beverly Boulevard, Case No.
CPC-2021-4089-AD-GPA-ZCHD-SP-SN; CPC-2021-4090-DA; VTT-83387-1A

Dear President Lawshe and Members of the City Planning Commission:

On September 12, 2024, the City Planning Commission will consider the Television City ("TVC") Project. I am writing to request additional modifications and conditions to ensure the Project's compatibility with the Beverly/Fairfax community, and with the incorporation of these changes I offer my support.

In recent years, Los Angeles has faced significant challenges as film and television productions have increasingly shifted to cities like Las Vegas and Atlanta, and to other countries abroad. This exodus threatens not only our city's signature entertainment industry, but also the middle class jobs that have long supported Los Angeles' families. While other states and countries offer generous financial incentives to bring these productions to their regions, Los Angeles must make its own strategic investments to retain its competitive edge. The proposed expansion of Television City will help meet the industry's growing demand for production space, keep valuable jobs in Los Angeles, and preserve the middle class backbone that sustains our communities.

When I first ran for office, I made clear my commitment to preserving the Television City campus, recognizing its critical importance to our regional and local economy. However, I also expressed concerns that the project, as originally proposed, was out of scale with the surrounding community and would require additional modifications to earn my support. At every step of this process, I have worked with the developer and the surrounding community to address concerns while maintaining the viability of a state-of-the-art studio that meets the evolving needs of the industry. My office has consistently emphasized the importance of addressing community concerns, which resulted in



numerous refinements to the original proposal. In addition to the neighborhood engagement that TVC has conducted throughout the entitlement process, we insisted that TVC conduct additional community outreach following the publication of the Final EIR in November 2023, and we required that meaningful Project modifications be made in response to this feedback.

In particular, on February 14, 2024, I requested several modifications to the Project in a letter to TVC, including (1) reducing the total maximum square footage; (2) reducing height along the perimeter of the property; (3) providing greater setbacks and stepbacks; and (4) establishing a best-in-class transportation demand management (“TDM”) program to reduce vehicle trips.

TVC responded to my request in its own letter to the Department of City Planning on February 23, 2024. Specifically, TVC's response agreed to the following changes:

- (1) reducing the total maximum floor area by 150,000 square feet;
- (2) reducing building heights across the Project Site, including along the perimeter (a 10 foot reduction in the southeast portion of the property (Subarea B), a 15 foot height reduction in the areas along the western, southern, and northeastern portions (Subarea C) and an 80% reduction in the perimeter area of the tower in the central portion (Subarea D);
- (3) increasing the required setbacks and stepbacks;
- (4) doubling its TDM trip reduction commitment from 15% to 30%;
- (5) reducing the amount of basecamp area; and
- (6) removing its Regional Commercial land use designation request.

These refinements were incorporated in the Erratum, draft Specific Plan, and draft Sign District that were released on April 5, 2024.

While appreciative of those changes, I am now requesting the following additional Project modifications based on further stakeholder engagement, a review of the appeals, and feedback and community testimony at the Project's public hearing on May 15, 2024:

1. Additional Reduction of Project Size/Reduction of General Office by 50,000 Square Feet: Reduce the total maximum floor area by an additional 38,000 square feet and reallocate 12,000 square feet of floor area from general office to production office. This would limit the total maximum floor area to 1,686,000 square feet, as provided below. This would also limit the Floor Area Ratio (“FAR”) to approximately 1.57:1, which is less than a 5% increase above the existing permitted FAR (1.50:1).

- Limit the general office floor area to a maximum of 500,000 square feet (a 200,000 square foot reduction compared to the originally proposed general office floor area of 700,000 square feet).
- Reallocate 12,000 square feet of floor area from general office to production office (limiting production office floor area to a maximum of 712,000 square feet).

2. Additional Reduction of Project Height by 15 Feet Along Fairfax Avenue: Reduce the height of building facades fronting Fairfax Avenue from 88 feet to 73 feet (such that any

portion of a building above 73 feet is stepped back by at least 20 feet from the building façade).

3. Prioritize Entertainment-Related Office Uses: Include a new condition of approval to require TVC to prioritize entertainment-related uses for the general office space. See Exhibit A for the new proposed condition of approval to prioritize entertainment uses.

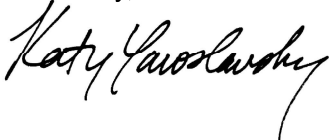
4. Ensure a Transparent TDM Enforcement Program: Include a new condition of approval to ensure the TDM Program is transparent and that it is monitored and enforced by LADOT. See Exhibit B for the new proposed TDM condition of approval.

I also want to confirm that the location of buildings within the development will be constructed as depicted in the Site Plan (Appendix A) and that deviations from the Site Plan will require a new discretionary review by the Director of Planning, appealable to the City Planning Commission per the Specific Plan.

With these additional Project modifications, in addition to the extensive construction and operational conditions of approval and TVC's robust community benefits package included in the draft Development Agreement, my office formally supports the TVC Project, and I respectfully request that the City Planning Commission approve the requested entitlements and deny the appeals.

Thank you very much for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Katy Yaroslavsky". The signature is fluid and cursive, with the first name "Katy" being more prominent.

Katy Yaroslavsky, Councilwoman
Fifth City Council District

c: Vince Bertoni, City Planning Director

Attachments:

Exhibit A - Proposed Condition of Approval Regarding Prioritization of General Office Space for Studio-Related Uses

Exhibit B - Proposed Condition of Approval Regarding TDM Program Monitoring

EXHIBIT A

TVC Project - General Office Condition of Approval Language

Owner shall use all commercially reasonable efforts to prioritize/target tenants engaged primarily in media, entertainment, and/or technology-related businesses, including, but not limited to, writing, casting, production, software, special effects, editing, content, communication, multimedia, professional, service, administrative, documentation and technical support, or ancillary businesses to the foregoing in connection with marketing efforts for the General Office space at the Project.

Upon written request by the City, Owner shall update the City of its efforts pertaining to the above commitment.

EXHIBIT B

TVC Project - Transportation Demand Management Program **Condition of Approval Language**

The Project TDM Program requires a 30% reduction in automobile trips at Project buildout.

The Project shall demonstrate progress toward that trip reduction target as the Project develops through an annual monitoring program which would consist of an annual sitewide traffic count at all Project driveways over the course of a typical week (Monday - Friday) in October. The traffic count shall record the hourly flow of inbound and outbound vehicles for the typical peak periods of the day as defined by LADOT. The average of the weekday hourly trips during the morning and afternoon peak commute hours shall be calculated.

The results of the traffic count shall be compared to the trip generation projections in the Project's EIR using a template approved by LADOT. The annual traffic count results shall compare the actual trips counted at the Project driveways to the trip generation projections calculated in the EIR.

If the project is developed incrementally, the comparison of actual trips to the EIR trip levels should demonstrate progress toward the 30% trip reduction target. If the 30% target, as described above, is not accomplished to the satisfaction of the General Manager of LADOT for a period of two consecutive years, LADOT shall require additional TDM strategies to be implemented by the Project prior to the next annual count.

The annual traffic counts shall be conducted until the Project has met the trip reduction target for a period of five consecutive years. Once the target is achieved for five consecutive years, the traffic counts shall be conducted every three years thereafter. If as a result of one of those triennial counts the target is not met, then the General Manager of LADOT shall require additional TDM strategies to be implemented by the Project and the Project shall return to annual counts until it has again met the target for a period of five consecutive years.

If additional development is added to the interim development levels already tested, new annual counts shall be required.

This condition shall be implemented to the satisfaction of LADOT.

Case No. VTT-83387; APN 5512-002-002; Project Address 7716-7860 West Beverly Blvd.

Hello Commissioners!

My name is Hana Kawano. I'm a board member of the Miracle Mile Residential Association or M-M-R-A, and I'm here to present our appeal of this project.

MMRA represents roughly 7,000 households of which about 70% are rent stabilized multifamily units. We are south of Wilshire Blvd bounded by Fairfax, La Brea and San Vicente, 1 mile south of Television City.

After examining the Applicant's statements, MMRA finds the TVC 2050 proposal has neither merit nor need. Applicant calls it a studio. It is not. In fact, their proposed Specific Plan, describes it as an office complex. 95 percent of the proposed new floor area is office space. Only 3 percent is studio space. Let me repeat: 95 percent office space, 3 percent studio space.

What is the reality for office space in LA? This year vacancies hit an all-time record, with 24% of L.A.'s offices sitting empty. (1)

For example, the Gas Company Tower recently went into receivership. Per the L.A. Times, the owners struggled to keep tenants before finally selling for half the value of the debt on the building – a loss of \$145 million. (2)

Every published office vacancy report we could find points to the same trend – there's a glut of office space and no need for more. (3)

So, why is Hackman Capital coming to the city and asking for an open-ended, blank check for up zoning? Why is Hackman telling you this is a studio complex when it's not? That's an important question, and, respectfully, this committee and our city council should be asking it very carefully.

We believe the answer is they're looking for city entitlements that will bail out what they already know is an upside down investment. How do we know? Because, in the fine print of their Specific Plan is a clause that would allow "Proposed uses not listed" ... "similar to and not more objectionable to the public welfare than the uses provided in...the Specific Plan." This switch would be at the sole discretion of the then-Planning Director, whoever that might be.

With a Specific Plan that allows almost any interpretation of "similar" use, plus 20 year entitlement and *no* public scrutiny, Hackman could cut its losses by selling the property and cashing in on the open-ended, blank check entitlements. Or it could switch from today's lure of a studio to tomorrow's lure of a sports arena, a theme park, an entertainment venue. Recall the fine print: Proposed uses not listed! And no public scrutiny! What could possibly go wrong? Recall Downtown L.A.'s graffiti towers. When construction began luxury towers seemed like a

good idea. Now, it's abandoned, a \$3.8 million burden on the city and ultimately, us the taxpayers. (4)

So, MMRA asks this committee to interrogate very closely the claims of this applicant.

If you've got to hide an office complex behind the cloak of a studio – don't build it.

If you don't know what you need to build and need 20 years to figure it out – don't build it.

If you need 20 years for the next big thing to dictate what you should build - don't build it.

Commissioners, Protect the City of Los Angeles and all who live here. Don't allow TVC to proceed unless scaled back to not require a general plan amendment. To the extent that you want to approve this project, all entitlements should be non-renewable, non-transferable and sunset in 3 years. And no permission to change with the sole approval of the City's planning director.

And above all, Hackman does not merit or need a massive, blank check incentive to cash in on the value of city entitlements.

Respectfully submitted,

Hana Kawano

Miracle Mile Residential Association

Citations:

1. <https://www.theatlantic.com/ideas/archive/2024/03/urban-doom-loop-american-cities/677847/>
2. <https://www.latimes.com/business/story/2024-03-28/los-angeles-office-skyscraper-faces-foreclosure-sale> and <https://www.globest.com/2024/03/28/brookfield-sells-l-a-office-for-half-its-debt/?slreturn=20240910140610>
3. <https://www.visualcapitalist.com/visualizing-1-billion-square-feet-of-empty-office-space/>
4. <https://www.businessinsider.com/abandoned-chinese-office-complex-los-angeles-oceanwide-plaza-2024-2>
<https://www.nytimes.com/2024/03/03/us/graffiti-downtown-la-skyscraper.html>
<https://www.nbclosangeles.com/local-2/downtown-la-graffiti-towers-vandalism/3341074/>



Planning CPC <cpc@lacity.org>

We support TVC ...outside waiting to enter

2 messages

Rosanne Sachson <studio@sachson-group.com>
To: cpc@lacity.org

Thu, Sep 12, 2024 at 11:18 AM



Rosanne Sachson

The Sachson Group ~ Architectural Interior Design

323.413.2539 landline ~ 503.929.2122 mobile

www.sachson-group.com

"Pleasure in the job puts perfection in the work." ~ Aristotle 384 BC- 322 BC

Planning CPC <cpc@lacity.org>
Draft To: Rosanne Sachson <studio@sachson-group.com>

Thu, Sep 12, 2024 at 11:19 AM

Good morning,

Please note your day of hearing submission has been received and it will be distributed to the City Planning Commission for the meeting of September 12, 2024.

Your submission can be viewed [here](#).

Thank you,



Cecilia Lamas, Commission Exec. Asst. II

- City Planning Commission (CPC)

- Harbor Area Planning Commission

- Central Area Planning Commission

200 N. Spring St., Room 272

Los Angeles, CA 90012

T: (213) 978-1299 | Planning4LA.org



Note: Regular Day Off Alternating Fridays

[Quoted text hidden]

55+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE CITY PLANNING COMMISSION'S CONSIDERATION:

Items 09-11:

Case Nos. VTT-83387, CPC-2021-4090, CPC-2021-4089

Subject Line:

Concerns for Redevelopment of Television City studio at Beverly and Fairfax

Message:

Councilmember Yaroslavsky and Planning Department:

I am writing to express my concern about the redevelopment of Television City at Beverly and Fairfax.

We believe there can be a win-win solution that allows for a viable studio without undue burden on the community. The developer's proposed project is just 25% studio and 75% office compound.

Eliminating the surplus 550,000 square feet of office space unrelated to studio use would honor the developer's stated intention to revitalize the studio and their commitment to "being a good neighbor for the long term."

I am particularly concerned about the following features:

I'm concerned about the traffic that will inevitably come with the large redevelopment project. Large construction equipment will clog roads. Using alternative means of transportation, like public transit, is unrealistic at this time, and employees who depend on major streets would rely on cutting through residential neighborhoods to find parking and shortcuts.

I'm concerned about the immense scale of the redevelopment project. With the project spanning nearly two million square feet, its impact on residential communities is alarming. It's not just the sheer size, but also the potential disruption to local services and street life that worries me deeply.

I'm concerned about the potential environmental repercussions of a project of this magnitude on our community. Given that 20-ton trucks will be constantly transporting dirt, waste, and hazardous materials, over a 20-year construction timeline, coupled with the emissions they produce, it's inevitable that the environmental quality and the residents' quality of life in Beverly-Fairfax will be negatively impacted.

The existing infrastructure and emergency response services currently in place are simply not adequate to support a development the size of TVC 2050. The Environmental Impact Report admits traffic and project uses WILL impact response times for fire, medical and police response and increase the demands for these services.

We're already exhausted by the noise and disruption of special events at the Motion Picture Museum. The TVC proposal sets no limits at all on special events - or on 24/7 operation of a helipad for VIPs.

Everything about this is awful and a bad idea, please please please DO NOT do this.

Thank you for your time and attention to this important issue.