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City Planning Commission
200 N. Spring St.
Los Angeles, CA 90012

Response to Staff Recommendation Report, proposed Target Hollywood. CPC-2015-74-GPA-SPA-CUB-SPP-SPR; CEQA No.: ENV-2008-1421-EIR and Addendum; 5520 W. Sunset Blvd., East Hollywood.

In October of 2007, Target Corporation secured a 75-year lease for an approximately 4-acre parcel at the corner of Sunset Blvd. and Western Ave. in Hollywood. Target originally intended to construct a Code-compliant, 1-level store at this location, but changed its plans after then councilman Eric Garcetti requested that the project introduce height and density along this low-level stretch of Sunset Blvd. The result was a 75-foot-tall parking podium with a Target store on top.

Then as now, the proposed 194,749 square foot retail development would set major precedents for "SNAP," the carefully crafted Specific Plan approved in 2001 to regulate the future of Hollywood development east of the 101 Freeway. This Plan, known as the "Vermont/Western Transit Oriented District Specific Plan," outlined a series of goals that the stakeholders could all agree were critical to the future of their historic community. Among those goals was the regulation of future development with an eye toward transportation, public facilities, aesthetics, open space the economic and social well being of the residents, and preservation of the existing residential neighborhoods through limitations on future development.

On November 12, the City Planning Commission is tentatively scheduled to review yet another Planning Department proposal that seeks to gut this Plan. In 2009, Planning Staff submitted a Recommendation Report supporting approval of every entitlement requested by Target. Six years later, following 3 Hearing Officer hearings, 2 Area Planning Commission hearings, 10 PLUM Committee meetings and 4 City Council votes, Planning Staff is once again recommending approval of the exact same Target building. Then as now, the findings in the Recommendation Report that are required to provide the legal framework to justify the entitlement requests are word for word exactly what Target's consultants have written. Then as now, the findings are without merit, and the project should be denied.

In simple language, despite the passage of almost eight years since Target first submitted its application for an over-height, overbearing retail store atop a massive 225,000 sq. ft. parking podium, and subsequent court action leading to the rescission of the applicant's approvals, members of Planning Staff are asking you to again support a Target store that's still over twice the allowed height and blatantly ignores SNAP's Development Standards and Design Guidelines. As a community, following multiple hearings where City officials ignored every objection voiced in opposition to the proposed Target development, it is our sincere hope that this Commission will not hitch another ride on this endless merry-go-round, and will instead reject the proposed project and demand that the law be obeyed.

The Target development would consist of a structure 74 feet, 4 inches in height, with 194,749 sq. ft. of retail development and 225,286 sq. ft. of above-grade parking spaces in two levels totaling 458 stalls. Total site development is 420,035 sq. ft. The net lot area is 160,678 sq. ft. The primary component of the project would be a 163,862 sq. ft. Target retail store on the third level, with 30,887 sq. ft. of unidentified retail at ground level. The applicant is Target Corporation, whose 1,800 stores in the United States generate over \$75 billion annually, and whose CEO receives almost \$50 million in compensation every year.

On October 9, 2007, Target secured a 75-year Ground Lease with property owner Jordan Man See Chin of Hong Kong for the proposed Target site at the southwest intersection of Sunset Blvd. and Western Ave. in East Hollywood. Target's rent for the first 10 years of this lease is \$157,916.66 per month or \$1,895,000 annually. To date, Target has wasted over \$15 million on rent alone for the project site, on a store that its consultants repeatedly stated couldn't afford subterranean parking because it would add \$5 million to the project cost.

Instead of re-engineering the partially constructed Target building to conform to the law, the Planning Department asks this Commission to re-engineer the law to conform to the building. Despite Target's acknowledgement during litigation that it was proceeding with construction at its own risk, Target and the City ask this Commission to reward Target for expediting construction while ignoring the community's concerns. We ask that you reverse such momentum and instead force Target to take responsibility and redesign the structure, which above the second floor is comprised mere of foam board supported by cheap metal drywall studs and can easily be knocked down.



Photo showing that existing Target building is comprised mainly on the third level of fiberglass foam board and non-structural metal studs.

Target can readily place its retail uses on the second floor of its project while converting the third level to rooftop parking. Target can also excavate beneath the ground floor loading docks and put in subterranean parking. All of this is possible, if only the Commission has the will to enforce the law.

Thank you,

Alexandra Kondracke