

CF-16-
CF-16- 1368 S-2
16- 1368

13121

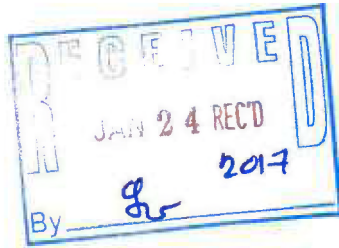
355 South Grand Avenue
Los Angeles, California 90071-1560
Tel: +1.213.485.1234 Fax: +1.213.891.8763
www.lw.com

LATHAM & WATKINS LLP

FIRM / AFFILIATE OFFICES

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

VIA EMAIL



January 24, 2017

City Council
City of Los Angeles
c/o City Clerk
200 N. Spring Street, Room 395
Los Angeles, CA 90012

Re: January 24, 2016, Agenda, Items 13 and 21: 333 S. La Cienega Boulevard
(Council File Nos. 16-1368 and 16-1368-S2)

Dear President Wesson and Honorable Councilmembers:

On behalf of CRM Properties we are providing for your consideration responses to very last minute comments submitted late yesterday by the Channel Law Group on behalf of Concerned Citizens of Beverly Hill/Beverly Grove. To our knowledge, Concerned Citizens of Beverly Hill/Beverly Grove has not commented at any time on the 333 S. La Cienega project (the "333 Project"), including the Environmental Impact Report prepared for the Project or at any hearing.

The Channel Law Group letter incorporates by reference the appeals, comments and documents filed by the Beverly Wilshire Homes Association ("BWhA") and Joseph Bourgeois of SoCal Environmental Justice Alliance ("SoCal"). These appeals, comments and documents have been responded to previously in the EIR and in responses submitted by CRM Properties and the City Planning Department.

In addition, the Channel Law Group letter refers to other development projects ("332-336 North Oakhurst" and the "Palladium Project"), which are not related to the 333 Project. The Channel Law Group letter also includes comments submitted by another law firm on behalf of a different opponent to the "Palladium Project". In part, those comments quote language and reference pages to an Advisory Agency determination that are not from the 333 Project.

Much of the letter appears to be cribbed from this prior submission by another law firm with regard to the creation of a Hybrid Industrial Zone Ordinance, the loss of industrially zoned land in the City, a Koreatown project, a 1966 Grand Jury, and a Citizens Committee from the late 1960's. The Channel Law Group letter also attaches various exhibits (over 200 pages) that the Channel Law Group says were obtained and submitted to the City in connection with "Palladium Project". Many of the exhibits are articles and reports that appear to relate to a history of zoning

and general plan issues involving the City over a 50 year period dating from the 1960's. To the extent the Channel Law Group letter is trying to relate the comments made on other projects to the proposed 333 Project's general plan amendment or zone change, similar comments made by BHWA regarding the general plan amendment and zone change have been addressed in the EIR and in responses to the appeals and comments.

The Channel Law Group also makes various references to Cedars Sinai Medical Center, its potential for growth, and an undescribed "Master Plan" and "Life Sciences buildings". The Channel Law Group also raises undocumented and unsubstantiated assertions regarding substantial deterioration of Third Street during the construction of the "Life Sciences buildings" and the 8500 Burton Way project. The relevance of these observations to the 333 Project is not clear.

Other questions and observations raised by the Channel Law Group letter that appear to be related to the 333 Project have either already been addressed previously in the EIR or responses to comments or are inaccurate or unclear. For example, with regard to a question raised by the Channel Law Group with respect to the location of construction worker parking, Project Design Feature PDF TR-1 requires that the applicant prepare and submit to the Los Angeles Department of Transportation for approval a Construction Traffic Management Plan that includes, among numerous other elements, construction worker parking locations. PDF TR-1 is clear that construction worker parking shall not be located in a residential neighborhood. Further, additional temporary spaces during the construction period to accommodate the 25 spaces provided for the 8500 Burton Way project will be provided near 8500 Burton Way project.

The Channel Law Group raises a question of what housing is being provided by the 333 Project. As is also clear from the 333 Project documents and the City Planning Department and CRM Properties presentations at hearings, the 333 Project includes both market rate and affordable housing units.

Contrary to the Channel Law Group's assertion, there has been no Brown Act violation in connection with the 333 Project. The 333 Project was originally scheduled to be heard by the City Council's Planning and Land Use Committee on January 10, 2017. An agenda for such hearing, including a detailed description of the 333 Project items before the Committee, was issued by the City Clerk on January 6, 2017, more than 72 hours prior to the hearing. The hearing was continued to January 18, 2017, and the agenda for such hearing with a detailed description of the 333 Project items before the Committee was issued by the City Clerk on January 13, 2017, again more than 72 hours prior to the hearing. The procedures for addressing the Committee were explained by the Chair of the Committee during the hearing. Ample opportunity was provided for individuals to speak on the 333 Project items. Moreover, the Committee at the hearing recommended the reduction in height for the 333 Project. It is entirely unclear how a determination made by the Committee in an agendaized public hearing can be a Brown Act violation.

LATHAM & WATKINS ^{LLP}

Consistent with the recommendations of the Planning and Land Use Management Committee, the City Planning Commission, and Planning Department staff, we respectfully request your approval of the 333 Project and the related actions.

Very truly yours,



George J. Mhlsten
of LATHAM & WATKINS LLP

cc: Luciralia Ibarra, Department of City Planning
Alejandro Huerta, Department of City Planning