

# URBAN PLANNING STUDIOS

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August 27, 2018

Los Angeles City Council  
Planning and Land Use Management Committee  
200 N. Spring Street  
Los Angeles, CA 90012  
Attn: Zina Cheng

**RE: Correspondence from Applicant of Original Case, No. ZA 2016-2548(CUB)(CUX)  
Council File No. 18-0166S1, 18-0166S2  
ENV-2018-4643-CE  
The Lyric Theatre, 520 N. La Brea Ave.**

Los Angeles City Council Members:

The environmental review of the subject project and application should properly have been exempted from the requirements of CEQA from the beginning of this process. The application of exempted status to the project now is proper, and is consistent with the guidance of CEQA.

The proposed project involves improvements to the interior only, of an existing 4,200.0 sq. ft. commercial building in the C4-1VL Zone. It is clear from a reading of the guidelines of CEQA, and of a review of the Legislative Intent behind it, stated under Chapter 1 of CEQA, that projects such as that at 520 N. La Brea Ave. are intended to be exempted from the requirements of CEQA. To hold otherwise would be to subject an unreasonable number of projects to heightened environmental scrutiny. This approach would unreasonably delay the City administrative processes, resulting in procedural gridlock for all manner of projects whether they be residential, commercial or other.

CEQA may be read in the abstract, and its guidelines pulled out of all context. If that approach is taken, then any conclusion is possible. Any project can be made to seem worthy of heightened environmental scrutiny. But context is key. A project involving interior remodeling in an existing urban setting is different from a project involving new construction in an existing urban setting, which is different from a project involving new construction in an undeveloped setting. These scenarios are not all comparable, and they should not all be studied equally. The judgment of the Lead Agency, in this case the City of Los Angeles Planning Department, is vital to provide the context and common sense the process requires to function in a reasonable and expeditious manner.

If common sense is not introduced into the process from the outset, then depending on the partisan-basis of the interested parties, any project, any issue, can be tortured into a straw man, with purported threats upon the "environment" disseminated to sow the seeds of fear in the public, and drive them to oppose projects which are otherwise entirely reasonable for their specific site.

This fear is not grounded in any rational reality. In fact, it is grounded in the opposite, a denial of the simple fact that we all, the municipalities, the lead agencies, the city officials, and the citizenry...we all inhabit a City. It is a City which lives and breathes and gains its dynamics by placing disparate peoples together, and next to each other, and requires of them that they all attempt to coexist.

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We do need the text of CEQA to help us understand this. We all know it intuitively. That when you live in a City, you will be buffeted by the forces around you. But that buffeting is not an experience to reject outright. It is one that each resident of the City reconciles themselves with, as a natural part of life in the City.

To keep things as they are, to resist the inherent development of cities, is a common cry heard in Planning proceedings. However, everything else after the initial protestations, is window dressing for the fact that each argument starts with the core premise. It is that the aggrieved party **wishes for things not to change**.

Jane Jacobs, in *The Death and Life of Great American Cities* writes of this angst, and concludes her book by stating,

"...It may be romantic to search for the salves of society's ills in slow-moving rustic surroundings, or among innocent, unspoiled provincials...*but it is a waste of time* [italics added]...Dull inert cities, it is true, contain the seeds of their own destruction and little else. But lively, diverse, intense cities contain the seeds of their own regeneration, with energy enough to carry over for problems and needs outside themselves." (*The Death and Life of Great American Cities*, Jane Jacobs, Page 585)

The energy that Jacobs refers to is the intent of each of the citizens of that City, to continue to contribute to, and grow the City in positive, community-affirming ways. This is the goal of the Lyric Theatre in the current project.

The Lyric Theatre is an arts venue, presenting music and performing arts, which seeks to sustain that programming with the on-site sale of alcoholic beverages. This is a symbiotic combination of uses which exists by necessity. In this modern age, with the nature of commercial property, an arts venue DOES NOT SURVIVE without ways to supplement its income, with alcohol sales being the chief revenue generator for the vast majority of performing arts venues. **And lost in the appellant's arguments as well is the fact that the theater use itself is permitted BY RIGHT in the C4 Zone.**

In denying the current CEQA appeal, and allowing the granted entitlement of ZA 2016-2548(CUB)(CUX) to proceed forward, the City Council and its PLUM Committee will be allowing a new seed of community, cultural and commercial growth to propagate. In Jacob's words, this seed will continue the process of "regeneration" Cities such as Los Angeles require. Without uses such as the Lyric Theatre, a City can become "dull" and "inert." With uses like the Lyric, a City can cultivate the energy Jacobs advocates for, which then can, "...carry over for problems and needs outside themselves."

Sincerely,



Kiyoshi Graves, Agent for Applicant, Agent for Owner  
On behalf of Dorothy M. Braun, and Ryan Braun