

Communication from Public

Name: Craig A. Fry

Date Submitted: 03/20/2023 03:31 PM

Council File No: 21-0777-S1

Comments for Public Posting: Attached please find a letter addressed to the Planning and Land Use Management Committee regarding Agenda Item No. 14 (CF 21-0777-S1) for consideration at its upcoming meeting on Tuesday, March 21, 2023. Thank you.

CRAIG FRY & ASSOCIATES LLC™
DEVELOPMENT CONSULTING
1010 S. ARROYO PKWY STE. 6 | PASADENA, CA. 91105 | 626.665.9525 |
CONTACT@CRAIGFRYANDASSOCIATES.COM

March 20, 2023

TO: Los Angeles City Council, Planning and Land Use Committee
FROM: Craig A. Fry, President, Craig Fry and Associates
SUBJECT: BULGARI RETREAT-CF-21-077. PLUM AGENDA ITEM NO. 14

I respectfully submit this letter of support for the project located at the properties located at 9712 Oak Pass Road, Los Angeles, California. I served with the Los Angeles City Fire Department for 31 years and rose to the position of Deputy Chief and served as the Fire Marshal for the entire City. I also was responsible for Emergency Operations for the area the Bulgari Retreat will be located. I was considered one of the Fire Departments experts in Brush Fire Operations and was responsible for numerous laws enacted to prevent the catastrophic effects of Brush Fires dealing with the City of Los Angeles including the No Parking on Red Flag Days, the Increased Separation of Brush from Structures, and allowable types of construction with the High Fire Severity Zone.

As the Incident Commander of numerous Brush Fires, I have seen the importance of smart intelligent well-thought-out development within the Hillside Areas of the City. I have also seen the disastrous results of over development on substandard roads and substandard water systems.

I was asked to voice my expert opinion on how this project would impact the safety of this community and the impact on Emergency Operations. I provided input into the design of the Buildings, Separation of the Structures, Safety Features of the Construction, and Emergency Training for the Facility. I reached out to current members of the LAFD to gather their input regarding the needs they felt necessary for this project and particularly this project on their emergency operations for the project.

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We worked with the project ownership to ensure the following:

- Improvement of access roads which would allow Fire Companies to gain access during emergency operations and allow civilians to exit so that they may not become trapped by a fast-moving fire.
- The construction materials utilized for the building would be of the type that would be non-combustible and or rated so that the impact of a fire would be eliminated or reduced to a factor that would ensure the non-spread or increased fuel load necessary for a Brush Fire to grow.
- Improvement of the Fire Hydrant and Water Main Systems to provide a major component necessary to stop a Brush Fire during its early stages, one of the improvements for the area includes a Fire Department connection at each pool that can be utilized to obtain all the water from a pool for firefighting purposes.
- The construction of Shelter in Place buildings that would allow guests, employees, and nearby residents to remain in the area during a Brush Fire Situation, would keep non-trained, non-experienced individuals from attempting to leave the area which would impact the ability of Fire Companies to get into the critical areas to provide the necessary work to stop a Brush Fire.
- To design the landscaping features and types of plants that would be both beneficial for the area in reducing Brush Fires and stabilize the hillsides from collapse during inclement weather. The removal of all the non-native and fire prone trees and vegetation which significantly exist today to complement the vast measures the Bulgari Resort is proposing.

Conclusion:

This property from the perspective of a fire expert and make no mistake this property as it is today as a far greater liability to fire and personal safety if left as it is.

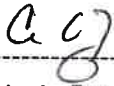
The proposed Bulgari Resort will improve Fire Safety and Fire Infrastructure. It will eliminate the deadly brush and non-native vegetation, improve response times, and will provide a measure of safety not only for the property but for the entire community that has never been available in the past. The project will improve the fire safety and the fire infrastructure of not only project site as it sits now, but for the entire neighborhood.

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This project has been well thought out, designed properly, and will have a positive impact on the Life Safety for the community.



Craig A. Fry, President
Craig Fry and Associates

Communication from Public

Name: Benedict Canyon Association

Date Submitted: 03/20/2023 02:02 PM

Council File No: 21-0777-S1

Comments for Public Posting: Dear Hon. Member of the PLUM Committee: On behalf of the Benedict Canyon Association, a voluntary neighborhood homeowners' association in the Benedict Canyon neighborhood of Los Angeles (which neighborhood is approximately 2,700 households), we urge you to support Motion CF 21-0777-S1, and stand with the more than ten thousand Los Angelenos who actively oppose this unnecessary commercial hotel project in a residential community that sits in an extreme high fire severity zone. Your colleague Councilmember Katy Yaroslavsky has heard the pleas of her constituents and she has made a motion to request that the Director of Planning bring an end to a proposed General Plan Amendment that would have a severe impact on the environment and set a dangerous precedent for our city. This project would create an environmental disaster, open the door to uncontrolled commercial development in the precious natural resource of the Santa Monica Mountains, and create real life-safety hazards. At this moment of unprecedented climate crisis, this is no time to destroy decades of careful zoning and planning. We urge you to stand with Councilmember Yaroslavsky and Mayor Karen Bass, both of whom have vocally and unequivocally opposed this inappropriate project. Every major environmental group in the region stands with our community in opposing this project — among them are the Hillside Federation, Tree People, The Santa Monica Mountains Conservancy, the Bel Air Beverly Crest Neighborhood Council, the Benedict Canyon Association, and the Sierra Club Santa Monica. Thank you very much for your consideration. Sincerely, /s/ David Kadin, President



March 20, 2023

Los Angeles City Council Planning and Land Use Management Committee

Re: March 21, 2023 Hearing (Agenda #14)

Council File # 21-0777-S1

Motion (Yaroslavsky-Raman) requesting Director of Planning, Department of City Planning (DCP) to consider rescinding the initiation of a General Plan Amendment for the Retreat at Benedict Canyon Project, Case No. CPC-2018-1506-GPA-VZC-SP-SPP-SPR

Dear Hon. Members of the PLUM Committee:

On behalf of the Benedict Canyon Association, a voluntary neighborhood homeowners' association in the Benedict Canyon neighborhood of Los Angeles (which neighborhood is approximately 2,700 households), we urge you to support Motion CF 21-0777-S1, and stand with the more than ten thousand Los Angelenos who actively oppose this unnecessary commercial hotel project in a residential community that sits in an extreme high fire severity zone. Your colleague Councilmember Katy Yaroslavsky has heard the pleas of her constituents and she has made a motion to request that the Director of Planning bring an end to a proposed General Plan Amendment that would have a severe impact on the environment and set a dangerous precedent for our city.

This project would create an environmental disaster, open the door to uncontrolled commercial development in the precious natural resource of the Santa Monica Mountains, and create real life-safety hazards. At this moment of unprecedented climate crisis, this is no time to destroy decades of careful zoning and planning.

We urge you to stand with Councilmember Yaroslavsky and Mayor Karen Bass, both of whom have vocally and unequivocally opposed this inappropriate project. Every major environmental group in the region stands with our community in opposing this project — among them are the Hillside Federation, Tree People, The Santa Monica Mountains Conservancy, the Bel Air Beverly Crest Neighborhood Council, the Benedict Canyon Association, and the Sierra Club Santa Monica. Thank you very much for your consideration.

Sincerely,

David Kadin, President

Communication from Public

Name: Mark Levin, Save Our Canyons Board President

Date Submitted: 03/20/2023 02:54 PM

Council File No: 21-0777-S1

Comments for Public Posting: Planning and Land Use Management Committee Members: I write to you as President of Save Our Canyons, a non-profit dedicated to preserving the Santa Monica Mountains, to ask your support for Motion CF 21-0777-S1 filed by Councilwoman Katy Yaroslavsky regarding the proposed Bulgari hotel in an entirely residential hillside community. We ask that you stand with their constituents and not allow the largest corporation in the world to rewrite the environmental and zoning regulations members of this committee have held in place for decades. Save Our Canyons and more than 11,000 concerned citizens vigorously oppose this attempt to seek a General Plan Amendment and zoning change to build this large scale commercial project. We ask that you support Councilwoman Yaroslavsky's motion to ask the Director of Planning to rescind the initiation of a General Plan Amendment. ??In addition to our petition with over 11,000 signatures, our organization is joined in its opposition by the leading environmental organizations in the region, including the Santa Monica Mountains Conservancy, Tree People, Citizens for Los Angeles Wildlife, the Bel Air-Beverly Crest Neighborhood Council, the Benedict Canyon Association, the Hillside Federation, and the Santa Monica Mountains Task Force of the Sierra Club. This is not just a zoning issue or a land use issue. This is an existential issue for our City and our environment. The greenbelt of the Santa Monica Mountains has been protected since the birth of Los Angeles. We stand on the shoulders of those who came before us. This is a generational relay race we're all running. In a relay, you're only as strong as your weakest link. If one generation drops the baton, the race is lost. Now the baton is with us. We have a responsibility to protect these mountains — and this ecosystem — for our children and their children and generations beyond that. Councilwoman Yaroslavsky made this Motion because she recognizes that this project is completely inappropriate for the community, for the City of Los Angeles and because it will set a dangerous precedent for commercialization of the Santa Monica Mountains. Councilwoman Yaroslavsky has stated publicly that the proposed hotel project will create substantial life-safety hazards, increased fire danger, and it is an inappropriate commercial development and it would set a dangerous precedent for Los Angeles. Councilwoman

Yaroslavsky has heard the voices of thousands of community members who have, in writing, stated their opposition to this project — including nearly all of the adjacent properties — and she understands that the commercial hotel's application for a General Plan Amendment must be rescinded now, without further draining the limited resources of the City, the community, and especially the Planning Department. This is an opportunity to restore faith that the City Government of Los Angeles can distinguish appropriate development from inappropriate development. We depend on our elected leaders to stand up for their constituents, and not bend to multi-national corporations or wealthy developers who want to rewrite our hard-fought zoning laws for their benefit. This Motion is fully supported by the decision of the California Court of Appeal in *Las Lomas Land Co. v. City of Los Angeles* (2009) 177 Cal.App.4th 837, where the Court upheld the City's denial of an application for a development while it was in the EIR review process. The Court noted that only the City and the community — but not the applicant — have the right to a full EIR process. When the City has the discretion to deny an application the City cannot be held liable for doing so prior to the completion of the EIR process. In this case, the simple fact is that the application for a change to the General Plan and a zone change can never be approved because the findings that are required under the Municipal Code can never be made. Given this fact, the commercial portion of the application should be brought to an end now. We urge this Committee to vote in support of the Motion, to stand with the thousands of energized constituents who oppose this project, to preserve the Santa Monica Mountains, and to protect the integrity of the planning process by ending this misguided commercial proposal without further straining the community, the Planning Department, and the City of Los Angeles. Sincerely, Mark Levin
?Board President, Save Our Canyons

SAVE OUR CANYONS

March 20, 2023

Planning and Land Use Management Committee Members:

I write to you as President of Save Our Canyons, a non-profit dedicated to preserving the Santa Monica Mountains, to ask your support for Motion CF 21-0777-S1 filed by Councilwoman Katy Yaroslavsky regarding the proposed Bulgari hotel in an entirely residential hillside community. We ask that you stand with their constituents and not allow the largest corporation in the world to rewrite the environmental and zoning regulations members of this committee have held in place for decades.

Save Our Canyons and more than 11,000 concerned citizens vigorously oppose this attempt to seek a General Plan Amendment and zoning change to build this large scale commercial project. We ask that you support Councilwoman Yaroslavsky's motion to ask the Director of Planning to rescind the initiation of a General Plan Amendment.

In addition to our petition with over 11,000 signatures, our organization is joined in its opposition by the leading environmental organizations in the region, including the Santa Monica Mountains Conservancy, Tree People, Citizens for Los Angeles Wildlife, the Bel Air-Beverly Crest Neighborhood Council, the Benedict Canyon Association, the Hillside Federation, and the Santa Monica Mountains Task Force of the Sierra Club.

We support the Councilmember's motion for the following reasons:

1. This project will have a profoundly negative impact upon the fragile and critical environment of one of the most precious resources in Los Angeles — the Santa Monica Mountains;
2. The location of the proposed commercial hotel project in a high fire severity zone in the middle of an established wholly residential community will imperil the lives of the residents;
3. The project will destroy mountains and hillsides, wildlife habitat and corridors, protected and significant trees, cause significant light pollution, noise and air pollution, and increase traffic on narrow, substandard streets connecting the westside of Los Angeles to the San Fernando Valley;
4. The proposed General Plan Amendment creates a dangerous and unacceptable precedent for future, uncontrolled development in environmentally sensitive areas of Los Angeles.

This is not just a zoning issue or a land use issue. This is an existential issue for our City and our environment. The greenbelt of the Santa Monica Mountains has been protected since the birth of Los Angeles. We stand on the shoulders of those who came before us. This is a generational relay race we're all running. In a relay, you're only as strong as your weakest link. If one

generation drops the baton, the race is lost. Now the baton is with us. We have a responsibility to protect these mountains — and this ecosystem — for our children and their children and generations beyond that.

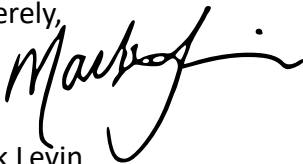
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This is an opportunity to restore faith that the City Government of Los Angeles can distinguish appropriate development from inappropriate development. We depend on our elected leaders to stand up for their constituents, and not bend to multi-national corporations or wealthy developers who want to rewrite our hard-fought zoning laws for their benefit.

This Motion is fully supported by the decision of the California Court of Appeal in Las Lomas Land Co. v. City of Los Angeles (2009) 177 Cal.App.4th 837, where the Court upheld the City's denial of an application for a development while it was in the EIR review process. The Court noted that only the City and the community — but not the applicant — have the right to a full EIR process. When the City has the discretion to deny an application the City cannot be held liable for doing so prior to the completion of the EIR process. In this case, the simple fact is that the application for a change to the General Plan and a zone change can never be approved because the findings that are required under the Municipal Code can never be made. Given this fact, the commercial portion of the application should be brought to an end now.

We urge this Committee to vote in support of the Motion, to stand with the thousands of energized constituents who oppose this project, to preserve the Santa Monica Mountains, and to protect the integrity of the planning process by ending this misguided commercial proposal without further straining the community, the Planning Department, and the City of Los Angeles.

Sincerely,

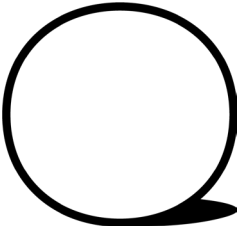


Mark Levin
Board President, Save Our Canyons

cc: Save Our Canyons Board of Directors

Communication from Public

Name: Alfred Fraijo Jr.
Date Submitted: 03/20/2023 12:17 PM
Council File No: 21-0777-S1
Comments for Public Posting: Dear Chairman Harris-Dawson and Honorable Councilmembers:
Attached please find a letter addressed to the Planning and Land Use Management Committee regarding Agenda Item No. 14 (CF 21-0777-S1) for consideration at its upcoming meeting on Tuesday, March 21, 2023. Thank you.



March 20, 2023

VIA ELECTRONIC MAIL AND LACOUNCILCOMMENT.COM

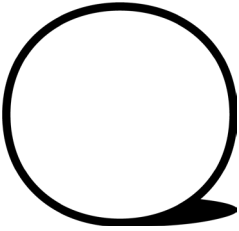
Planning and Land Use Management Committee
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: CF-21-0777-S1, PLUM Agenda Item No. 14

Dear Chairman Harris-Dawson and Honorable Councilmembers:

Our firm represents 9712 Oak Pass Road, LLC (the “Applicant”) in connection with the Bulgari Resort & Estates Los Angeles Project (the “Project”) in the City of Los Angeles (the “City”), Case Nos. CPC-2018-1506-GPA-VZC-SP-SPP-SPR, VTT-74908, ENV-2018-1509-EIR. As you know, on March 15, 2023, Councilwoman Katy Yaroslavsky introduced a motion (the “Motion”) that if implemented would illegally terminate the vested and due process rights of the Applicant and violates the City’s rules that mandate the City complete consideration of the requested entitlements for the Project. To be clear, the Director of Planning has the discretion to recommend or not recommend approval of the proposed General Plan Amendment (“GPA”) when the Department of City Planning makes its recommendation to the City Planning Commission prior to a public hearing on the Project. However, the Motion is requesting that the process be terminated beforehand and therefore, if implemented, would be contrary to the due process rights afforded every applicant once an application has been deemed complete and the requested action vests. This incident marks the second time a sitting councilmember for Council District 5 has attempted to direct the Director of Planning to rescind the General Plan Initiation for the Project costing the Applicant excessive time and money and jeopardizing the Applicant’s partnership with hotel operator Bulgari Hotels. I previously addressed this issue with the City Attorney’s Office in a letter dated August 19, 2021, and in two letters addressed to the Planning and Land Use Management Committee (“PLUM”) dated October 18, 2021 and November 1, 2021. To summarize:

1. The Action Recommended in the Motion Violates the Los Angeles Municipal Code and Charter;
2. The Motion If Implemented Would Violate State Law Because the Project is Vested;

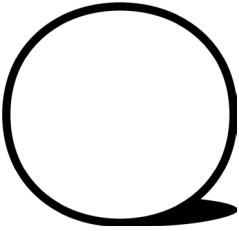


3. The Motion Makes Claims Unsupported by the Facts and that Contradict Expert Conclusions;
4. The Motion If Implemented Would Violate Common Law Rules of Fairness; and
5. The Motion by Councilwoman Yaroslavsky Demonstrates Her Bias Towards the Project and Thus City and State Rules Require She Recuse Herself from Deliberation on the Project.

I. Background

Prior to the Director’s signed and approved initiation of the General Plan Amendment (“GPA”) for the Project, the Applicant consulted and met with Director Vince Bertoni and his staff, as well as Council District 5 about the Project and its request for GPA initiation. On October 12, 2017, the Director conditionally approved initiation of the GPA, attached hereto as Exhibit 1, so long as “Project Alternatives to be evaluated include but are not limited to: A zoning compliant project; a reduced hotel project; and a 100 percent single-family residential project.” On March 16, 2018, the Applicant filed the Project application with the City in reliance on the Director’s signed and approved initiation of the GPA. The Project application, which includes a Vesting Zone Change and Vesting Tentative Tract Map, was deemed complete on May 1, 2020 and July 22, 2020, respectively, and the Applicant, in good faith, has pursued the Project in reliance on the Director’s authorization to do so and in full compliance with the applicable rules currently in effect. In fact, following the filing of the Project application, in consultation with City Planning and Council District 5 and as a result of initial community feedback, the Applicant agreed to reduce the Project scope from 99 to 58 hotel guest rooms – a substantial 41% reduction in density.

Both prior to and subsequent to the deemed complete date for the Project, the Applicant undertook comprehensive community engagement activities with stakeholders, as well as Council District 5. Such efforts included door-to-door canvassing in early Fall 2019 of neighbors within an approximately one mile radius of the Project site, resulting in hundreds of direct interactions. In addition, the Applicant met extensively with Council District 5 about the Project. Furthermore, the Applicant initiated scoping for the Draft Environmental Impact Report (the “DEIR”) pursuant to the California Environmental Quality Act (“CEQA”) on December 2, 2020 with over one hundred individuals in attendance, and continues to engage in scoping activities that exceed CEQA requirements. The City published the Notice of Preparation and Initial Study on November 10, 2020, upon which the Applicant received more than 500 comment letters. In response to concerns raised in the comment letters, the Applicant coordinated with City Planning and the environmental consultant to continue work on the DEIR to extensively address all comments raised.



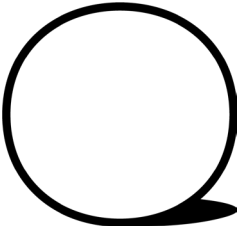
The Motion, attached hereto as Exhibit 2, expresses concerns relating to “strain[ed] infrastructure,” hillside topography, wildlife habitat, and wildfire risks. Each of these topics is under the City’s review through the CEQA process and is being addressed through technical study and appropriate mitigation that the Applicant is proposing. In addition, in close coordination and agreement with the City, the Applicant is engaged in consultation with the California Department of Fish and Wildlife regarding the Project to formulate acceptable mitigation. The environmental reports and analyses that are currently in process will afford City decisionmakers, including Council District 5, with a clear and accurate picture of potential project impacts upon which they may base their decision concerning the Project’s discretionary requests.

II. Arguments

A. The Action Recommended in the Motion Violates the Los Angeles Municipal Code and Charter.

The GPA was initiated by the Director of Planning, and therefore, the City Council cannot unilaterally rescind the GPA. Pursuant to City Charter Section 555 and Los Angeles Municipal Code (“LAMC”) Section 11.5.6, the Director-initiated GPA vested the Applicant’s right to process the GPA through completion in compliance with the City’s adopted procedural requirements. Specifically, City Charter Section 555 instructs that the “Director of Planning *shall* make a report and recommendation on all proposed amendments” to the General Plan. Further, “[p]rior to Council action, the proposed amendment *shall* be referred to the City Planning Commission for its recommendation and then to the Mayor for his or her recommendation.” LAMC Section 11.5.6.B reinforces the mandatory nature of this process: upon initiation of the GPA, “the Director *shall* prepare the amendment and a report recommending action by the City Planning Commission,” and “the Director *shall* transmit the file to the City Planning Commission for its action.” In short, the City’s adopted procedural requirements clearly mandate the process to be followed once a GPA is initiated, including Director, City Planning Commission, and mayoral recommendation, followed by City Council action. The City’s procedures offer no alternative once a GPA has been initiated, and the process cannot simply be cut short by the City Council. Since the Director conditionally approved the initiation of the Applicant’s GPA on October 12, 2017, the process must therefore continue per the City’s procedural requirements.

Further, the Motion asserts certain General Plan inconsistencies to substantiate its proposed rescission of the Director-initiated GPA; however, per Section 556 of the City Charter, such consistency findings are made when the proposed GPA is considered at a public hearing by the City Planning Commission and the City Council. In other words, the Motion is premature and attempts to circumvent the City’s codified procedures. Councilwoman Yaroslavsky would have



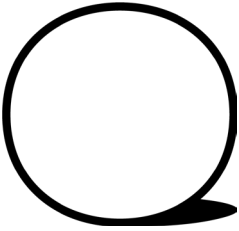
had an opportunity during the administrative process to consider such findings prior to any final action on the Project.

Relatedly, the Motion illegally circumvents the Applicant's ability to process the application through completion in violation of its due process rights. While it is true that the Applicant has no right to develop the Project in the absence of an approved GPA and other approvals, the Applicant has a legitimate claim of entitlement to the processing of the GPA request by operation of the October 12, 2017 GPA initiation approved by the Director and the mandatory procedures of the City Charter and LAMC and Applicant detrimentally relied on such procedure and spent millions of dollars in its pursuit of the DEIR. The City's procedural requirements are intended to operate as a "significant substantive restriction" on the City's consideration of Director-initiated GPAs. (*Parks v. Watson*, 716 F.2d 646, 657 (9th Cir. 1983)). The use of "shall" in City Charter Section 555 and LAMC Section 11.5.6 is the "explicitly mandatory language necessary to create an entitlement." (*Wedges/Ledges of California, Inc. v. City of Phoenix*, 24 F.3d 56, 63 (9th Cir. 1994)). The City Charter and LAMC contain mandatory language that restricts the discretion of the City Council to deny the procedural requirements to an applicant who meets the minimum eligibility requirement of a Director-initiated GPA.

Because the Applicant has a right to process the GPA through completion, any governmental interference with this process violates the Applicant's due process rights if the action is arbitrary or irrational. This is shown through an analysis of "the need for the governmental action in question, the relationship between the need and the action, the extent of harm inflicted, and whether the action was taken in good faith or for the purpose of causing harm." (*Sinaloa Lake Owners Ass'n v. City of Simi Valley*, 882 F.2d 1398, 1409 (9th Cir. 1989) (overruled on other grounds)). Here, the Motion's instruction to the Director to rescind the initiation of the GPA is not needed, as the GPA will ultimately be considered by the Director, City Planning Commission, Mayor, and City Council per the City's procedures; the harm inflicted on the Applicant, through considerable delay and additional expense, is significant; and the Motion was not made in good faith, as there are indications that Councilmember Yaroslavsky was reacting prematurely to erroneous claims made by groups opposed to the Project. For all of the above reasons, the Motion's impact on the Project is arbitrary and irrational and thus violates the Applicant's due process rights.

B. The Motion If Implemented Would Violate State Law Because the Project is Vested.

Because the Applicant filed a Vesting Zone Change and a Vesting Tentative Tract Map for the Project and its application has been deemed complete by City Planning, the Applicant has a vested right to proceed with development under the ordinances, policies, and standards in effect when the City accepted the Vesting Zone Change and Vesting Tentative Tract Map applications as complete. (LAMC Section 12.32.Q; Govt C §§66498.1(b), 66474.2). Local



regulations and policies adopted after the deemed complete date would not apply to the Project as a matter of law. Councilwoman Yaroslavsky attempts to enforce an unadopted ordinance as evidence for rescission of the Director-initiated GPA; however, the ordinance is not in effect and the Project is vested. Furthermore, as part of the CEQA process, Planning and the Applicant have studied impacts to biological resources and consulted with CDFW regarding appropriate mitigation measures to address potential impacts to the same. The councilmember and public will have an opportunity to review and comment on the adequacy of the analysis and proposed mitigation during the public comment period for the DEIR.

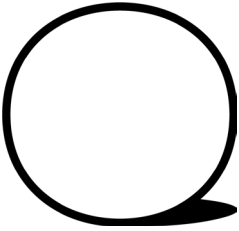
While the vested right is conferred to the Applicant upon *approval* of the Vesting Zone Change and Vesting Tentative Tract Map (*Id.*), the applicable GPA procedures in effect at the time the applications were deemed complete in 2020 nonetheless govern because Charter Section 555 and LAMC Section 11.5.6 control and any amendments to such procedures would require legislative approval.

C. The Motion Makes Claims Unsupported by the Facts and that Contradict Expert Conclusions.

The Motion asserts that the Project is inconsistent with the Updated Safety Element with respect to wildfire risk because the property should be maintained as low density residential and open space. The Motion further insinuates that the Project would disrupt wildlife habitat and exacerbate wildfire risk.

First, the GPA initiation was conditioned on the study of an all-residential alternative, which the DEIR would include. Therefore, Councilwoman Yaroslavsky would have had the opportunity to consider a low density residential scenario – however, the introduction of the Motion disqualifies the councilmember from considering the Project.

Second, the Project has been designed from the beginning to protect sensitive habitats and promote biodiversity. For example, the proposed land use mix was developed in order to minimize the extent of required grading. As concluded by technical experts, the mitigation being proposed through the DEIR would result in superior preservation and impact mitigation as compared to existing site conditions. In other words, the mitigated Project would improve regional wildlife conditions compared to the status quo. The Applicant is coordinating with California Department of Fish and Wildlife (“CDFW”) and complying with the City Tree Ordinance. While the Motion does not explicitly note any deviation from the proposed wildlife ordinance, there have been thorough wildlife movement studies performed and specific mountain lion reports prepared as well as mitigation recommendations that have been verified and guided by Dr. Winston Vickers. Additionally, initial mitigation agreements have been discussed and agreed to by CDFW through an exhaustive coordination process. Additional



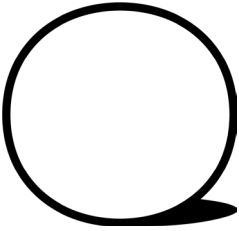
mitigation measures for oak trees have been provided not only to satisfy City Tree Ordinance but also Oak Woodland Community mitigation for CDFW sensitive communities. Mitigation for other CDFW sensitive communities have also been verified with CDFW prior to public review as requested by the City. Adequate mitigation for the Project is available and CDFW has agreed to acceptable mitigation measures suitable for thorough CEQA evaluation.

Third, the DEIR is also studying wildfire and fire protection impacts. In fact, the DEIR includes improvements such as fuel modification, irrigation, and roadway clearance beyond the requirements of Los Angeles Brush Clearance Ordinance to drastically enhance fire life safety in and around the Project and would also provide improved ingress and egress for emergency vehicular access. Should a wildfire exist that threatens the property or safety of people at the Project Site, the “Ready, Set, Go!” program developed by the International Association of Fire Chiefs, adopted by the City of Los Angeles, and identified in the Project Wildfire Evacuation/Shelter-in-Place Plan would be implemented. In addition, if evacuation is considered unsafe, shelter-in-place would be implemented as identified in the Project Wildfire Evacuation/Shelter-in-Place Plan. The Project includes three Type I (Fire Resistant) construction buildings designated for the shelter-in-place plan, which are designed to withstand high temperatures for a long time without the danger of collapsing. For purposes of the shelter-in-place plan, the three buildings could house up to 4,566 people, affording a large amount of excess space during a shelter-in-place event for the local community that is within walking distance. Accordingly, the Project would relieve pressure on the roadways in the canyon moving away from the Project vicinity. These measures were designed and endorsed by former Fire Chief of City of Los Angeles.

All of this information will be published by Planning for the City Council’s ultimate consideration. In accordance with City Charter Section 556, findings of consistency supported by evidence in the record will be made when the proposed GPA is heard by the City Planning Commission and the City Council. By purporting to make inconsistency findings in the preamble to the Motion, Councilwoman Yaroslavsky is attempting to circumvent the City’s codified procedures, is acting outside the scope of her role as a member of the City Council, and is presupposing legislative conclusions that are contrary to the facts that have been developed pursuant to the established administrative process.

D. The Motion If Implemented Would Violate Common Law Rules of Fairness.

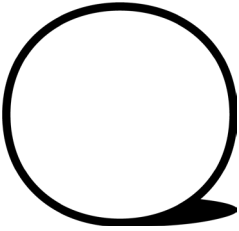
The rules cannot be unilaterally amended for a single project, to the exclusion of all others, resulting in disproportionate effects on that single applicant. The Charter and LAMC set forth a mandatory process for evaluating and deciding a Director-initiated GPA. See City Charter Section 555; LAMC Section 11.5.6. This process cannot be unilaterally amended for a single project. See *Woody’s Group, Inc. v. City of Newport Beach*, 233 Cal. App. 4th 1012, 1028 (2015)



(“changing the rules in the middle of the game does not accord with fundamentally fair process.”) Indeed, this is as basic a principle in California land use decisions as the principle that “[y]ou cannot be a judge in your own case.” (*Id.* at 1016). The idea is straightforward: a sudden change in the middle of the mandatory process, without amendment to the City Charter or LAMC, imposes a unique and inequitable burden on the Applicant as compared to other projects in the City, unfairly harming the Applicant. Councilwoman Yaroslavsky’s Motion requests the Director of Planning to deprive the Applicant of its due process rights by circumventing the mandatory review process described in the City Charter and the LAMC. The Applicant has spent years and millions of dollars to reach this scaled-down iteration of the Project based on feedback from the community and specifically from Council District 5. For example, the hotel component was reduced by nearly half – from 99 to 58 hotel units. In addition, the low profile of the bungalows and composition of Project structures were thoughtfully and painstakingly designed to integrate with the surrounding landscape and minimize visibility from surrounding streets based on feedback from the City and from the community.

Further, the opportunity for City evaluation and consideration of Councilwoman Yaroslavsky’s concerns will occur in due time during the City’s mandatory GPA initiation process. Planning is nearly done with its review of the DEIR, which has taken several years to complete. The Applicant has demonstrated its commitment to transparency, open communication, and meaningful multi-sector engagement with elected officials, interested members of the public, and with the surrounding community. The Applicant has gone above and beyond to ensure that there are ample opportunities for community engagement beyond statutory requirements, that the scaled-down version of the Project reflects the feedback received, and that the environmental analysis is comprehensive. The Project represents a collaborative, years-long effort by the Applicant and by the City, and deserves the same unbiased opportunity for consideration as other projects pursuant to the City’s administrative process.

As required by the City rules and as set forth by years of precedent, the City decisionmakers and the public will have ample opportunity to review the Project, participate in public hearings, and adequately evaluate the Project in proper channels after considering the facts. In light of the significant investment by both City and Applicant, rescinding the GPA at this stage would result in an unprecedented and illegal action resulting in an egregious injury to the Applicant and risk a chilling effect on all developments, including much-needed housing developments within the City of Los Angeles. Specifically, the City Council’s willingness to depart from City procedures in this one instance would raise concerns among other project applicants that they will be the next target.

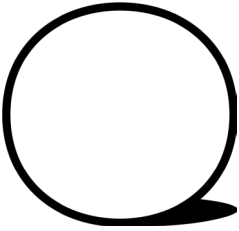


- E. The Motion by Councilwoman Yaroslavsky Demonstrates Her Bias Towards the Project and Thus City and State Rules Require that She Recuse Herself from Deliberation on the Project.
1. Councilwoman Yaroslavsky’s Bias Against the Project Creates a Conflict of Interest.

It is well established that elected officials must avoid actual and perceived conflicts of interest in order to provide fair and unbiased representation of their constituents. “To promote government decisions that are fair and accountable, City officials must avoid participating in actions that affect or appear to affect their private interests, both financial and non-financial.” (Ethics Commission, City Officials Handbook 2021, p. 12). Among the justifications for a conflict of interest is the City’s appearance standard that states that “it is ‘not in the public interest’ for you to act on a matter if you do not believe that you could act impartially or if the public might reasonably reach that conclusion. This can be true even when your interest in the matter is not financial. The City Attorney may decide, pursuant to City Charter Section 222, that the public interest prevents you from acting even when you would not be disqualified by state conflict of interest laws.” (*Id.* at 13). Similarly, state conflict of interest laws were designed to strike “not only ... at actual impropriety, but also to strike at the *appearance* of impropriety” in order to protect the public from impartial elected officials. *City of Imperial Beach v. Bailey* (1980) 103 Cal.App.3d 191, 197 (emphasis added); Gov. Code § 1090 *et. seq.* As there are no “cures” for, actual and perceived conflicts of interest (only limited exemptions and exemptions not applicable here), the elected official is required to recuse themselves from project deliberation. Violations of these provisions may result in substantial fines and/or prison time.

As described below, Councilwoman Yaroslavsky’s conduct demonstrates her bias and determination to prematurely evaluate the Project without consideration of the Project’s merits. First, Councilmember Yaroslavsky publicly admitted her opposition to the Project while campaigning to represent Council District 5. Yaroslavsky is credited with the following quote as published on a Project opponent’s website: “I STRONGLY OPPOSE THE PROPOSED BULGARI HOTEL PROJECT. I’M DEEPLY COMMITTED TO USING ALL THE TOOLS AND AUTHORITY AVAILABLE TO THE CITY COUNCILPERSON TO PROTECT OUR TREASURED MOUNTAINS.” (Save Our Canyon website: <https://saveourcanyon.la/home>). The statement was made prior to her taking office and demonstrates her longstanding bias against the Project.

Second, the Councilwoman has historically refused to meaningfully engage with Project supporters and with the Applicant. Councilwoman Yaroslavsky’s office has responded to constituents that she “is interested in hearing from the community about this project as it works through the review process.” However, on multiple occasions, the Applicant has invited Councilwoman Yaroslavsky to tour the property and to introduce her to the Project, yet she has

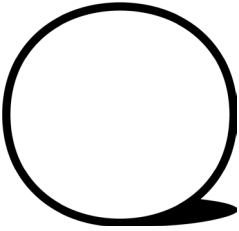


been unwilling to meet with the Applicant. Multiple constituents have reached out to Councilwoman to reiterate their support for the Project. Notwithstanding this outreach, her office has not provided genuine responses to Project supporters. As a council member, Councilwoman Yaroslavsky has a duty to represent all members of her constituency, not just those individuals opposed to the Project. Councilwoman Yaroslavsky has failed to act impartially during the ongoing administrative process.

Furthermore, Yaroslavsky's Motion is identical to previous demands made by specific Project opponents – implicating her ongoing animus and bias towards the Project and insinuating unlawful pre-hearing advocacy on behalf of Project opponents. The Motion requests the Director of Planning to rescind the GPA Initiation for the Project – circumventing the City's mandatory procedures without evaluation of the Project's merits. The Motion also reveals that Yaroslavsky's bias against the Project has not changed since her public opposition statement. Accordingly, Yaroslavsky must recuse herself from this matter because of her inability to be impartial during future Project deliberations.

2. The Councilwoman's Participation in the Hearing Will Result in an Unacceptable Probability of Actual Bias and Deprive the Applicant of a Fair and Impartial Hearing.

The law requires that the Project be considered on its merits after thoughtful and open deliberation by neutral and unbiased decisionmakers. Similar to state law requirements for conflicts of interest, "[t]he law does not require the ... applicant to prove actual bias. Rather, there must not be 'an unacceptable probability of actual bias'" on the part of a municipal decisionmaker. See *Woody's Group, Inc. v. City of Newport Beach*, 233 Cal. App. 4th 1012 - 1022 (2015). Based on evidence of bias, the Third District Court of Appeal recently held that an applicant for a gas station conditional use permit did not receive a fair hearing by the Sacramento City Council when the facts showed a councilmember's "prehearing commitment to achieving th[e] outcome" of a rejection of the permit. *Petrovich v. City of Sacramento*, 48 Cal. App. 5th 963, 974-76 (2020) ("*Petrovich*"). In determining bias, the court found significant: (i) evidence that the councilmember had likely corresponded with other councilmembers and the mayor to secure a majority position against the project; (ii) evidence that the councilmember had prepared "talking points" and other materials advocating against the project prior to the hearing; and (iii) similarities between the councilmember's talking points and advocacy group opposition letters, and other evidence indicating that the councilmember had been "coaching" the opposition in the weeks leading up to the hearing. (*Id.* at 975-76). The court held that based on this bias, the councilmember could not act as a "neutral and impartial decision maker, and should have recused himself from voting" at the appeal hearing. (*Id.* at 976).



Similarly here, Councilwoman Yaroslavsky openly opposed the Project prior to assuming office, thus establishing her public opposition of the Project early on. Since then, her behavior towards Project supporters and towards the Applicant remains unchanged, with all meaningful engagement reserved for Project opponents. As noted above, the Applicant’s repeated requests to discuss the Project remain unanswered. Further, Councilwoman Yaroslavsky’s Motion mirrors demands that have been made in the past by Project opponents – unequivocal evidence of her animus and bias towards the Project and her commitment to ongoing advocacy against the Project, even at this early stage. Based on this evidence, there is little question of Yaroslavsky’s “prehearing commitment” to Project opposition, and relatedly, a demonstrable risk of bias if she participates in Project hearings. Thus, per *Petrovich*, Councilwoman Yaroslavsky must recuse herself from all hearings regarding the Project based on her inability to remain impartial.

In closing, and for the aforementioned reasons, we respectfully request that PLUM deny the Motion. Thank you for your consideration.

Sincerely,

Alfred Fraijo Jr.
Partner

213.592.2966 direct
alfred@somosgroup.org

Attachments: Exhibit 1 – October 12, 2017 GPA Initiation; Exhibit 2 – March 15, 2023 Motion

EXHIBIT 1



REQUEST FOR INITIATION OF AN AMENDMENT TO THE CITY'S GENERAL PLAN

By law, only the City may initiate an Amendment to the General Plan. Therefore you must request that the City initiate a Plan Amendment by completing the following:

I hereby request that the Director of Planning initiate a General Plan Amendment
from: Minimum Residential, Very Low I and Very Low II Residential
to: Specialized Hospitality and Residential
on property located at: See Exhibit "A"
within the: Council District 5/Bel-Air Beverly Crest District/Community Plan.

By my signature below, I request the aforementioned General Plan Amendment and affirm my understanding that to ensure a comprehensive review of the request and to avoid the introduction of any "spot" planned land use, staff may recommend initiating additional properties ("added areas") within the immediate area for a similar General Plan Amendment and that, if so, updated application materials, including but not limited to, the radius maps and an expanded notification list, will be required.

Stacy Burrus
(Signature) -Applicant -Representative 10/11/2017
Date

Section Below For Staff Use Only

CASE NUMBER: _____

Pursuant to the Los Angeles City Charter and the Municipal code, I hereby:

- Approve the initiation of the plan amendment(s) as requested by the Applicant/Representative
- Also initiate additional properties ("added areas") as recommended by staff within the immediate area for a similar change of the plan from _____
to _____
on the property(ies) located at: _____

Vincent P. Bertoni, AICP
DIRECTOR OF PLANNING

[Signature]
Signature

* Project alternatives to be evaluated include but are not limited to: A zoning compliant project; a reduced 10-12-17
Date

hotel project; and a 100 percent single-family residential project.

MOTION

Following the initiation of a General Plan Amendment to change the land use designation for properties located at 9704-9712 West Oak Pass Road, 9800, 9801-9815 West Wanda Park Drive, 2534 North Hutton Drive from Very Low I Residential, Very Low II Residential, and Minimum Residential to High-Medium Residential by the Director of Planning, in March 2018, the Applicant submitted case materials for the Retreat at Benedict Canyon Project (Project) (Case Nos. CPC-2018-1506-GPA-VZC-SP-SPP-SPR, CPC-2018-1507-DA, and VTT-74908). In November 2020, the Initial Study was released for the Project. The Initial Study found potentially significant impacts related to air quality, biological resources, cultural resources, energy, geology/soils, Greenhouse Gas emissions, land use / planning, noise, public services, transportation, tribal cultural resources, and wildfire as a result of the Project, and thus required an Environmental Impact Report (EIR).

The Project described in the Initial Study proposes a 59-room hotel and eight single-family homes on an approximately 32.67-acre property in Benedict Canyon. The hotel portion of the site would consist of a total of 18 hotel buildings, totaling 59 guest rooms, a standalone parking structure, a funicular railway, and a main hotel building including outdoor amenities, commercial space, and subterranean parking. The hotel use could include special events and would have approximately 90 full time equivalent staff. The residential portion of the site would contain eight single-family homes, ranging between 12,000 and 48,000 square feet of residential floor area with associated garage parking. Development of the overall site would also include the removal of existing trees (including protected trees) and vegetation and the installation of new landscaping, pathways, exterior decks, and other outdoor amenities. Preliminary site grading would require approximately 117,230 cubic yards of total grading and result in the off-site export of approximately 950 cubic yards of soil, while the remaining 116,280 cubic yards of cut would be balanced on-site. Maximum excavation depths would be approximately 62 feet below the existing grade. In addition to protected trees, the subject site is and has the potential to be habitat for candidate, sensitive, or special-status species, such as Braunton's milkvetch, coast live oak, and mountain lion, as identified by the California Department of Fish and Wildlife.

The discretionary entitlements, reviews, permits, and approvals required to implement the Project include the following: General Plan Amendment; Vesting Zone Change (VZC) to change the site zoning to the Benedict Canyon Specific Plan zone; Specific Plan to establish allowable uses, development standards, and design guidelines for the development of the hotel and residential uses on-site; Vesting Tentative Tract Map for the merger and subdivision of the site into nine lots; and other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, haul route, grading permits, excavation permits, foundation permits, building permits, and sign permits.

Since the General Plan Amendment initiation, case filing, and publishing of the Initial Study, details related to the project have been brought to the attention of the City Council. The proposed six-star hotel will strain infrastructure in a community otherwise planned and developed for low-density, single-family development. The City has sufficient lands zoned for hotels with adequate infrastructure within fully urbanized areas. The secluded hillside location is isolated from other business, public transportation, public services and other cultural amenities which underscores the unessential nature of the project as it relates to the community, city, and region. Due to the remote hillside location and other reasons mentioned above, the project will not enhance the built environment in the surrounding neighborhood or perform a function or provide a service that is essential or beneficial to the community, city, or region.

Events such as weddings, corporate functions, dinners, and film screenings are proposed as part of hotel operations. The scale of such events would be inconsistent with the typical overall intensity of activity in the surrounding community, degrading the community with additional noise from patrons and amplified music, automobile trips, and impacts commensurate with the service of alcoholic beverages and live entertainment. The

MAR 15 2023

unique geography and topography of the location will further challenge the operator to maintain compliance with the Los Angeles Municipal Code Citywide Noise Ordinance, and typical noise control measures within the property such as noise barriers, sound absorbers, and buffer zones will be less effective. As such, the project's hillside location, size, height, operations, and other significant features will not be compatible with and will adversely affect or further degrade adjacent properties, the surrounding neighborhood, and public health, welfare, and safety.

Since the Initial Study was released in 2020, major new reports have highlighted the importance of protecting wildlife habitat and open space. The City has also advanced significant policies to direct development away from hillsides and undeveloped properties. These policies further implement General Plan Framework Policies supporting conservation areas. In February 2021, the Department of City Planning published the Protection Areas for Wildlife (PAWs) evaluation to identify important habitats for sustaining wildlife and connectivity within the City. In June 2022, the Los Angeles Sanitation and Environment Department published the LA Biodiversity Index Baseline Report, which highlighted the key role Los Angeles' municipal government must play in preserving biodiversity and the critical importance of preserving LA's unique ecosystem and place within the California floristic province, one of only 36 globally-recognized biodiversity hotspots.

On November 22, 2022, the City Council adopted a resolution directing the City (i) to treat the Santa Monica Mountains Conservancy (SMMC) as a trustee agency for California Environmental Quality Act (CEQA) for any project within the Santa Monica Mountains Zone and (ii) the Planning Department and other City Departments to consider the SMMC Eastern Santa Monica Mountains Natural Resources Protection Plan, adopted in December of 2021, in future CEQA actions and work with SMMC on all future habitat maps.

On November 29, 2021, the City Council adopted an update to the Safety Element to address wildfire risk, among other State requirements. The update to the Safety Element found:

Due to climate change the region today is subject to more frequent and severe wildfires. As of 2020, eight of the ten largest fires in California history occurred during the past decade. The 2009 Station Fire is the largest wildfire on record in LA County, with 160,557 acres burned. The 2020 Bobcat Fire burned 115,796 acres and contributed to hazardous air quality across the region, a challenge compounded by the surging Covid-19 pandemic, which kept many from seeking relief in communal facilities.

Today the City's approach to preventing and mitigating wildfire risk includes building standards, brush clearance, roadway requirements, parking restrictions, zoning limitations, and many more interventions detailed below.

Among other policies, the Updated Safety Element added the following policy to reduce risks of wildfire:

1.1.8 Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VFIFISZs, landslide areas, flood zones and in other areas with limited adaptive capacity.

The Project is located in a Very High Fire Severity Zone. Wildfire risk is continually exacerbated by continuing and escalating climate change. The Project is not consistent with the Updated Safety Element to maintain existing low density residential and open space in such zones.

In December 2022, the City Planning Commission sent forward the Wildlife Ordinance to the City Council; upon adoption (expected shortly), this Ordinance will signal the strongest affirmation from the City that it is of the highest important to reduce cumulative development impacts on plants, animals and natural resources

while providing co-benefits related to climate resilience and public health. These significant new reports and policy changes, coupled with the continued prevalence of wildfires affecting communities at the wildland-urban interface (the 2018 Wolsey Fire, 2019 Getty Fire, and 2021 Palisades Fire to name a few), constitute substantial new evidence that must be considered by the Director of Planning as having some bearing on the General Plan Amendment initiation.

I THEREFORE MOVE that the Council request the Director of Planning to consider rescinding the initiation of a General Plan Amendment for the Retreat at Benedict Canyon Project, Case No. CPC-2018-1506-GPA-VZC-SP-SPP-SPR, located at 9704-9712 West Oak Pass Road, 9800, 9801-9815 West Wanda Park Drive, and 2534 North Hutton Drive, in the Bel Air-Beverly Crest Community Plan Area, inasmuch as the proposed amendment does not reflect the land use patterns, trends, uses, and environmental and safety concerns, and does not further the intent, purposes, and objectives of the General Plan, including the Community Plan, the Framework Element, and the Safety Element.

PRESENTED BY:


KATY YAROSLAVSKY
Councilwoman, 5th District

SECONDED BY:



ORIGINAL

8

Communication from Public

Name: Marian Dodge
Date Submitted: 03/20/2023 04:48 PM
Council File No: 21-0777-S1
Comments for Public Posting: Hillside Federation supports CF 21-0777-S1.

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



PRESIDENT
Charley Mims
CHAIR
Marian Dodge
VICE PRESIDENTS
Mark Stratton
Jamie Hall
SECRETARY
Robin Greenberg
TREASURER
Don Andres

Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street, Room 340
Los Angeles, CA 90012
via email to City Clerk

March 20, 2023

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Bundy Canyon Assn.
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin/Hollywood West Res.
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

**Re: CF 21-0777-S1 Support
Retreat at Benedict Canyon - rescind General Plan Amendment**

Dear Councilmembers:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation's mission is to encourage and promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Federation urges City Council to support Councilmember Katy Yaroslavsky's motion CF 21-0777 - S1 to "rescind the initiation of a General Plan Amendment for the Retreat at Benedict Canyon, inasmuch as the proposed amendment does not reflect the land use patterns, trends, uses, and environmental and, safety concerns, and does not further the intent, purposes, and objectives of the General Plan, including the Community Plan, the Framework Element, and the Safety Element."

The Federation strongly opposes the proposed Retreat at Benedict Canyon. This commercial venture would replace two single-family homes in a minimum-low density residentially-zoned neighborhood in the Santa Monica Mountains—a designated Very High Fire Hazard Severity Zone—with a 59-room hotel, spa, restaurants and bars, with rooftop dining, a screening room, subterranean parking, funicular railway.

The developer applied for an amendment to the General Plan to up-zone the area from low residential to high residential which would commercialize the hillsides. The proposed project violates zoning restrictions designed to protect the character of the surrounding low-density hillside residential community, sets a dangerous precedent for commercialization and intensification of use, exacerbates fire risks in this fire-prone hillside area, and is grossly inconsistent with the state's climate change policy. The project is therefore inconsistent with the Federation's mission and violates policies and programs that support consistency with zoning for public health and safety in the hillsides, that support maintaining lower densities to preserve wildlife habitat and connectivity, flora and fauna and protect the hillside environment from devastating wildfires.

The Hillside Federation therefore urges City Council immediately pass CF 21-0777-S1 to rescind the amendment to the General Plan. A hotel is not appropriate in this hillside residential neighborhood.

Sincerely,

Charley Mims

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward

Communication from Public

Name: David T Meraz
Date Submitted: 03/20/2023 08:17 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the United Journeymen's Letter of support—local 250.

Local Union 250

JASON GUERRERO
President

BEN CLAYTON
Business Manager/
Financial Sec'y-Treas.

BRANDON MORTORFF
Assistant Business Manager

STEAM - REFRIGERATION - AIR CONDITIONING - PIPE FITTERS, WELDERS AND APPRENTICES
OF THE UNITED ASSOCIATION OF THE UNITED STATES AND CANADA



Business Representatives

RAY CAMACHO
HECTOR CARBAJAL
OSCAR DELCID
DAVID GRIGGS
TOM MORTON
JON MUNOZ
GUS TORRES
NAT WILLIAMS

Organizers

CRYSTAL LEWIS
JESSE SANCHEZ
PETE WOHLGEZOGEN

18355 SOUTH FIGUEROA STREET, GARDENA, CA 90248-4217

Bus. Mgr. (310) 660-0035

Fax (310) 329-2465

March 1, 2023

Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of the Steamfitters and Refrigeration Local 250 and its 6,500 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 250 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Local 250 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

A handwritten signature in black ink that reads 'Ben Clayton'.

Ben Clayton,
Bus.Mgr./Fin.Sec'y-Treas.

BC/sm
opeiu537/afl-cio

cc; Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 08:18 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the Los Angeles County Fed Letter of Support of Bulgari Hotel & Resort.



Yvonne Wheeler
President

Thom Davis
Chair

Date: February 6, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of the Los Angeles County Federation of Labor, AFL-CIO and our 800,000 members across Los Angeles County, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

Several of our local affiliates, including The Los Angeles/Orange County Building and Construction Trades Council and UNITE HERE Local 11, are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement and card check neutrality, which will bring good, union jobs. Moreso, as we understand it, this project takes 33 acres of environmentally sensitive land and preserves 75% of it.

We have considered the arguments of the opponents of the project and we respect the desire expressed by some to preserve open space, but in this case there is no guarantee that if this project were rejected that this open space would be preserved at all. It is currently zoned for residential development, and the luxury residential development that would likely take place on this site could well preserve less of this open space than this project design does. In this case the most beneficial choice for the region is this modest hospitality development with good, union jobs and a large portion of preserved open space, rather than luxury housing developments that would not preserve the open space.

For these reasons, the LA Fed fully supports the proposed BVLGARI project.

Sincerely,

Yvonne Wheeler
President, Los Angeles County Federation of Labor

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director

Communication from Public

Name: David Meraz

Date Submitted: 03/20/2023 08:19 PM

Council File No: 21-0777-S1

Comments for Public Posting: I have attached the SoCal District Council of Laborers Letter of Support of Bulgari Hotel & Resort.



JON P. PRECIADO
Business Manager

PETER SANTILLAN
Secretary-Treasurer

SERGIO RASCÓN
President

**AFFILIATED LOCALS
SOUTHERN CALIFORNIA**

BURBANK
LOCAL 345

HOLLYWOOD
LOCAL 724

LONG BEACH
LOCAL 1309

LOS ANGELES
LOCAL 300

ORANGE COUNTY
LOCAL 652

POMONA
LOCAL 1414

RIVERSIDE AND IMPERIAL
COUNTIES
LOCAL 1184

SAN BERNARDINO, INYO,
AND MONO COUNTIES
LOCAL 783

SAN DIEGO
LOCAL 89

VENTURA
LOCAL 585

KERN,
SAN LUIS OBISPO, AND
SANTA BARBARA COUNTIES
LOCAL 220

ARIZONA
PHOENIX, AZ
LOCAL 1184

NEW MEXICO
ALBUQUERQUE, NM
LOCAL 16

**SOUTHERN CALIFORNIA
DISTRICT COUNCIL OF
LABORERS**

1123 Parkview Dr., Suite 300
Covina, CA 91724
Phone (626) 350-6900
Fax (626) 350-7583
www.scdcl.org

LIUNA! SOUTHERN CALIFORNIA DISTRICT COUNCIL OF LABORERS

Feel the Power

March 9, 2023

Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: **BVLGARI Resort Los Angeles - SUPPORT**

Dear Councilmember, Yaroslavsky,

On behalf of The Southern California District Council of Laborers (SCDCL) and its 33,000 members, I am writing to express our **strong support** for The BVLGARI Resort Los Angeles.

The SCDCL is proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to the City of Los Angeles. The property owner, Gary Safady, is a former union Laborer and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

The Laborers International Union of North America and its Southern California District Council fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyon's beauty with the planting of over a thousand drought tolerant trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue and economic benefit to the city for years to come.

We ask the city to stand with us by moving this project forward.

Sincerely,

SOUTHERN CALIFORNIA DISTRICT COUNCIL
OF LABORERS

Jon P. Preciado
Business Manager

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 08:21 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the Laborers Local 300 Letter of Support of Bulgari Hotel & Resort.



LIUNA! Local 300

February 13, 2023

SERGIO RASCÓN
Business Manager

LUIS R. ROBLES
Secretary Treasurer

JAVIER NUÑEZ
President

TONY E. OLEA III
Vice President

RICARDO ANDRADE
Recording Secretary

FRANCISCO ARRIZON
Executive Board

DELFINO DE LA CRUZ
Executive Board

2005 W. Pico Blvd.
Los Angeles, CA 90006

Phone 213-385-3550
Fax 213-385-6985

www.local300.com

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of LIUNA Local 300 and our over 9,000 active and retired members, I am writing to express our strong support for The BVLGARI Resort Los Angeles. We believe that the project's solidarity with labor organizations, facilitation of union jobs to Los Angeles, environmentally conscious development, and economic stimulation merit your priority and approval.

The BVLGARI Resort Los Angeles has enthusiastically formed a working partnership with numerous labor unions through a Project Labor Agreement such as ours. As such, the project will deliver robust union work under the guidance and vision of owner Gary Safady, a former union cardholder. A cardholder of not just any construction Union, but of LIUNA. Gary was and is one of us. It is not often that we can point out success stories like Gary to our members. It is not often that we can tell our apprentices that you do not have to work as a Laborer until your body gives out. It is not often that an individual like Gary who made it out of our Union comes back to put his fellow Laborers to work. Gary stands for everything we hope and wish our members could be. I would like to one day tell our members to get out of that sewage pipe, stop remediating that Lead contaminated soil or stop raking that asphalt in 110+ degree heat because there are opportunities to become the next Gary Safady around the corner. Unfortunately, there is none and I cannot tell them that.

Which is why The Bulgari resort is so important to us. Along with good paying Union jobs, the hotel also stands to benefit the local area. The project will maintain open space in the canyon, provide a valued communal space and plant over a thousand drought-tolerant trees. Concurrent with preserving the canyon's natural beauty, the project will also provide tens of millions of dollars in revenue to Los Angeles for years to come.

Feel the Power

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forward.

Sincerely,

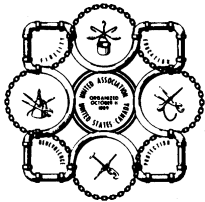


Sergio Rascon
Business Manager
LIUNA Local 300

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 08:22 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the UA Local 78 Letter of Support of Bulgari Hotel & Resort.



Founded 1889

UNITED ASSOCIATION
of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
The United States and Canada

UA Local Union: **78**

March 2, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of United Association Plumbers Local 78 and our almost 2000 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 78 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Plumbers Local 78 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

Jeremy Diaz
Business Manager/Financial Secretary-Treasurer

cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Mark McManus
General President
Patrick H. Kellett
General Secretary-Treasurer
Michael A. Pleasant
Assistant General President

Communication from Public

Name: David Meraz

Date Submitted: 03/20/2023 08:31 PM

Council File No: 21-0777-S1

Comments for Public Posting: I have attached the UA District 16 Letter of Support of Bulgari Hotel & Resort.



Southern California Pipe Trades District Council 16

RODNEY M. COBOS
Business Manager
Financial Secretary/Treasurer

January 30, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of the Southern California Pipe Trades and the 18,000 members of our 13 affiliated Local Unions, I am writing to express our strong support for the BVLGARI Resort Los Angeles.

We at the Southern California Pipe Trades are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property, Gary Safady, for years. He is a former union card holder and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Southern California Pipe Trades fully supports this project due to our belief that a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyon's beauty with the planting of over a thousand draught tolerate trees. We are confident the BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trades Council and we ask the city to stand with us by moving this project forward.

Sincerely,

Rodney M. Cobos
Business Manager/Financial Sec. Treasurer
Southern California Pipe Trades

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 08:34 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the IUPAT Local 831 Letter of Support of Bulgari Hotel & Resort.

TRADESHOW & SIGNCRAFTS

Luis F. Robles
Business Manager

LOCAL UNION 831

Fred Murillo
Field Representative

Jon Coley
Business Representative

PAINTERS AND ALLIED TRADES
DISTRICT COUNCIL 36 - IUPAT

Matt Cornell
Field Representative

February 2, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

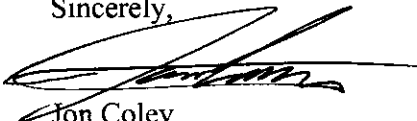
On behalf of Local 831 and its 1480 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 831 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Local 831 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,



Jon Coley
Business Representative

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor



Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 08:36 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the IUPAT DC 36 Local 1991, Local 1241, and Local 1136 Letter of Support of Bulgari Hotel & Resort.



International Union of Painters & Allied Trades, AFL-CIO
Local 1991 Affiliated with District Council #36
Luis F. Robles
Business Manager



January 31, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of Local 1991 and its 388 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 1991 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Local 1991 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

ANA HANSON

Business Representative

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor



District Council 36

Local Union 1247

RESILIENT FLOOR & DECORATIVE COVERING

January 31, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of the Resilient Floor & Decorative Covering Local Union 1247 and its 800 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local Union 1247 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union cardholder and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Local Union 1247 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good-paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyon's beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city to stand with us by moving this project forward.

Sincerely,

Robert Smith
Political Director

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor



DISTRICT COUNCIL 36 PAINTERS AND ALLIED TRADES
DRYWALL FINISHERS
REGIONAL LOCAL UNION 1136



January 31, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Council member Yaroslavsky,

On behalf of the Drywall Finishers Local union 1136 and its 1,250 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 1136 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

Local 1136 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

Robert Smith
Political Director

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor



Painters & Allied Trades District Council 36

Luis F. Robles
Business Manager

DRYWALL FINISHERS, FLOORLAYERS, GLAZIERS, PAINTERS, TRADESHOW & SIGNCRAFT

January 24, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of The Painters & Allied Trades District Council 36 and its 10,000 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at DC 36 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

DC 36 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

Robert Smith
Political Director

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor

Communication from Public

Name: David Meraz

Date Submitted: 03/20/2023 08:49 PM

Council File No: 21-0777-S1

Comments for Public Posting: I have attached the IBEW Local 11 Letter of Support of Bulgari Hotel & Resort.



IBEW Local Union Number 11

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO

JOEL BARTON – BUSINESS MANAGER / FINANCIAL SECRETARY

January 26, 2023

Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

Re: BVLGARI Resort Los Angeles

Dear Councilmember Yaroslavsky:

On behalf of IBEW Local 11 and its 11,000 members, I am writing to express our strong support for The BVLGARI Resort Los Angeles.

We at Local 11 are proud to have a working partnership with the BVLGARI Resort Los Angeles in the form of a Project Labor Agreement, which will bring union jobs to our great city. I have known the owner of the property for years. Gary Safady is a former union card holder, and a visionary who is going to develop this project. We stand side by side with Mr. Safady to support this environmentally friendly project.

IBEW Local 11 fully supports this project and believes a large investment like the BVLGARI Resort Los Angeles can fund good paying union jobs, keep open space in our hillside, provide a communal space for local residents, and maintain the canyons beauty with the planting of over a thousand draught tolerate trees. The BVLGARI Resort Los Angeles will also provide millions of dollars in revenue to the city for years to come.

The Draft Environmental Impact Report reflects the needs of the Building and Construction Trade Council and we ask the city stand with us by moving this project forwards.

Sincerely,

Joël Barton
Business Manager

JB/tbcm opeiu#537 afl-cio

cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director
Los Angeles County Federation of Labor, AFL-CIO

Communication from Public

Name: David Meraz
Date Submitted: 03/20/2023 09:01 PM
Council File No: 21-0777-S1
Comments for Public Posting: I have attached the United Here Letter of Support of Bulgari Hotel & Resort.

UNITE HERE! Local 11

January 10, 2023

To: Honorable Councilmember Katy Yaroslavsky
Los Angeles City Council
200 N. Spring Street, Suite 440
Los Angeles, CA 90012

RE: BULGARI Resort Los Angeles

Dear Councilmember Yaroslavsky,

On behalf of UNITE HERE Local 11 and its 30,000 members, I am writing to express our support for The Bulgari Resort Los Angeles.

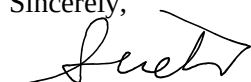
One of the goals of our Union in the development process is to try to find opportunities to combine excellent jobs with projects that create green space and help build a functioning ecosystem in our region. As we understand it, this project takes 33 acres of environmentally sensitive land and preserves 75% of it. The project overall is 41% smaller than when it was first proposed, but because it is providing a luxury experience, this relatively small development footprint will create a lot of high value jobs for our members.

The developer has also committed to planting 1000 native trees, and would replace non-native trees removed by the development with native ones. It is our hope that we could develop a pilot training program where our landscaping members learn native plant gardening skills using this job site as a model.

We have considered the arguments of the opponents of the project and we respect the desire expressed by some to preserve open space, but in this case there is no guarantee that if this project were rejected that this open space would be preserved at all. It is currently zoned for residential development, and the luxury residential development that would likely take place on this site could well preserve less of this open space than this project design does. Our Union advocates for housing development where we can achieve affordable housing, housing in denser city centers, and housing near transportation hubs. In this case the most beneficial choice for the region is this modest hospitality development with a large preserved opens space rather than luxury housing developments that would not preserve the open space.

For these reasons we support the hospitality retreat proposal of the Bulgari Resort Los Angeles.

Sincerely,



Susan Minato
Co-President
UNITE HERE Local 11

Cc: Mayor Karen Bass
Los Angeles City Council
Vince Bertoni, City Planning Director

Communication from Public

Name: David Meraz

Date Submitted: 03/20/2023 09:10 PM

Council File No: 21-0777-S1

Comments for Public Posting: I have attached the UA Local 398 Letter of Support of Bulgari Hotel & Resort.



UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

UA Local Union:

398

Subject:

8590 Utica Avenue, Suite 200
Rancho Cucamonga, CA 91730
(909) 945-5557 fax (909) 945-5560
Email: Office@local398.org

Mark McManus
General President

Patrick H. Kellett
General Secretary-Treasurer

Michael A. Pleasant
Assistant General President

August 4, 2022

To: Vince Bertoni
City of Los Angeles, Department of City Planning
201 N Figueroa Street,
Los Angeles, CA 90012

RE: BVLGARI Resort Los Angeles

Dear Director Vince Bertoni,

The BVLGARI Resort Los Angeles Draft Environmental Impact Report reflects the needs of the City of Los Angeles and must be released as soon as possible to keep the process moving forward in an expeditious manner.

On behalf of Plumbers and Steamfitters, Local 398 and its 1,000 + members, I am writing to express our strong support for The BVLGARI Resort Los Angeles. We believe that the project's solidarity with labor organizations, facilitation of union jobs to Los Angeles, environmentally conscious development, and economic stimulation merits your priority and approval.

The BVLGARI Resort Los Angeles has enthusiastically formed a working partnership with numerous labor unions through a Project Labor Agreement. As such, the project will deliver robust union work under the guidance and vision of owner Gary Safady, a former union card holder. The hotel also stands to benefit the local area through maintaining open space in the canyon, providing a valued communal space and planting of over a thousand drought-tolerant trees. Concurrent with preserving the canyon's natural beauty, the project will also provide tens of millions of dollars in revenue to Los Angeles for years to come.

Plumbers and Steamfitters, Local 398 humbly urges you to stand with us by moving this project forward by releasing the Draft Environmental Impact Report as soon as possible.

Sincerely,



William F. Steiner
Business Manager

Cc: Los Angeles City Councilmembers
Ron Herrera, Los Angeles County Federation of Labor

Communication from Public

Name: David Glosman

Date Submitted: 03/20/2023 09:11 PM

Council File No: 21-0777-S1

Comments for Public Posting: Dear Councilwoman Yaroslavsky, I live with my wife and children in Benedict Canyon, a mere couple blocks away, and I am writing to show my support for the Bulgari Resort and to ask that you withdraw the motion to reverse the decision of the General Plan Amendment. The majority of the neighbors and community want this project to move forward, and I know many have already reached out to you and your office recently to express their support and ask for you to meet with us. It is appalling that as our representative, you are requesting a motion without taking the time to hear from us, this not only depriving the developer of its due process, but all of us Angelenos as well. I grew up in these hills and have seen the community develop from just a few houses to the beautiful community it is today. The Bulgari Resort project will only further enhance our experience and will be the most responsible use of this land. Please do not steal this opportunity from us and allow the democratic process to continue so we can all learn the facts. David

Communication from Public

Name: Jonathan Keyes
Date Submitted: 03/20/2023 09:58 PM
Council File No: 21-0777-S1
Comments for Public Posting: Councilwoman Yaoslavsky, I'm writing in support of the Bulgari Resort. I grew up in these hills and have lived nearby for more than 30 years in Beverly Glen. I've witnessed the canyon communities evolve over the decades and one thing that Benedict lacks is a gathering place similar to what Roscome, Beverly Glen, and Laurel have. Also, it will deliver an invaluable fire infrastructure while respecting the canyon topography and wildlife. The Bulgari Resort is a valuable commodity to our neighbors and City and I urge you to help us make this project happen. I hope you'll start listening to our side and come see it for yourself. Jonathan Keyes