



September 7, 2021

Board Members
The Neighborhood Council of Westchester/Playa
Westchester Municipal Building Community, Room 7166
Los Angeles, CA 90045

Re: Loyola Marymount University's Specific Plan Amendment Application

Dear NCWP Board Members:

Thank you for the Neighborhood Council's thoughtful consideration of Loyola Marymount University's proposed amendment to its Specific Plan to facilitate the redistribution of square footage across land use categories on the university's Westchester campus (the "Specific Plan Amendment"). We appreciate the extensive dialogue on these issues over the last two years, and we look forward to our continued collaboration with the Neighborhood Council of Westchester/Playa ("Neighborhood Council") as the university moves forward with obtaining approval of the Specific Plan Amendment from the City.

Following receipt of the Neighborhood Council's conditional approval letter dated February 2, 2021 (attached), we submitted to the Los Angeles City Planning Department revisions to our original Specific Plan Amendment application to address many of the conditions outlined by the Neighborhood Council. These revisions and our other responses are set forth in the chart attached as Appendix A. We believe the numerous changes we made to our original Specific Plan Amendment application demonstrate our sincerity in addressing neighborhood requests and reflect our continued commitment to partnering with the Neighborhood Council and the community.

We appreciate the Neighborhood Council's efforts and engagement on this matter and look forward to its support as we move forward in the City approval process.

Sincerely,

John S. Kiralla

Senior Vice President, Marketing, Communications, and External Relations

Enc.

cc: Councilmember Mike Bonin
Juliet Oh, Los Angeles City Planning
Esther Serrato, Los Angeles City Planning
Jordann Turner, Los Angeles City Planning
Lynne Scarboro, Loyola Marymount University
Marianna Villa, Loyola Marymount University
Trevor Wiseman, Loyola Marymount University
George J. Mhlsten, Latham & Watkins LLP
John C. Heintz, Latham & Watkins LLP

Appendix A

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
1.	Retain the right to Administrative review.	<p>Section 8.1 of the existing Specific Plan specifies that LMU follow an "Administrative Clearance" process when implementing its buildout. LMU is not requesting any amendments to this process in connection with its Specific Plan Amendment application. As you are aware, the Administrative Clearance process requires LMU to "circulate copies of its Administrative Clearance application to the Council Office representing the Campus's District and the Westchester/Playa Neighborhood Council when it submits the application to the Director."</p> <p><u>Existing Specific Plan Language</u></p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>8.1 ADMINISTRATIVE CLEARANCE</p> <p>A. Administrative Clearance. Except for the exceptions set forth in Subsection 8.1.C below, and the exempt uses set forth in Subsection 8.1.D below, no grading permit, foundation permit, building permit, use of land permit, or permit for a change of use shall be issued for a Project located within the Specific Plan Area unless an Administrative Clearance has been issued pursuant to the procedures set forth in this Section. The provisions of this Section shall replace the Project Permit Compliance provisions of Section 11.5.7.C of the Municipal Code.</p> <ol style="list-style-type: none"> 1. Director's Authority. The Director shall have the authority to review each Project for compliance with all applicable provisions of this Specific Plan, and if in compliance, to grant an Administrative Clearance. 2. Procedures. The Director shall establish the appropriate procedures, forms and fees required for the administrative clearance application. LMU shall circulate copies of its Administrative Clearance application to the Council Office representing the Campus's District and the Westchester/Playa Neighborhood Council when it submits the application to the Director 3. Ministerial Review. The Administrative Clearance shall be a ministerial review of the applicable provisions of this Specific Plan and determination of whether a Project complies with the applicable provisions of the Specific Plan, including the Mitigation Monitoring and Reporting Program in Appendix A. </div>
2.	LMU to assign and retain a Compliance Officer who will attend quarterly NAC meetings and report to the community through that Committee on a quarterly basis and to the PLUC Committee on a semiannual basis.	<p>In response to the Neighborhood Council's request, LMU revised its Specific Plan Amendment application to propose the new Specific Plan section below.</p> <p><u>Revised Specific Plan Amendment Request</u></p>

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
		<p><i>Section 8.2 NEIGHBORHOOD COUNCIL COMMUNICATIONS</i></p> <p><i>LMU shall maintain a dedicated liaison officer to facilitate communications with the Westchester/Playa Neighborhood Council. The liaison officer will, as appropriate, attend Neighborhood Advisory Committee meetings on a quarterly basis and Westchester/Playa Neighborhood Council Planning and Land Use Committee meetings on a semi-annual basis to provide updates, if any, on the status of the University's implementation of this Specific Plan.</i></p>
3.	<p>TDMP/Mobility Study: LADOT perform an on-site traffic study, event traffic study, neighborhood impact traffic study including the impacts of continuing operations at Gerstein Pavilion and of the new arena.</p>	<p>LMU currently implements a Transportation Demand Management plan (the "TDM Plan") approved by LADOT. In response to the Neighborhood Council's request, LMU revised its Specific Plan Amendment application to require the submittal of an updated TDM Plan for approval by LADOT prior to the construction of the new Arena. The new TDM Plan will include a number of considerations for the neighborhood, as detailed in the proposed language reproduced below.</p> <p><u>Revised Specific Plan Amendment Request</u></p> <p><i>Section 5.1 VEHICULAR AND PEDESTRIAN CIRCULATION PLAN/ACCESS</i></p> <p>...</p> <p><i>Prior to the construction of a new sports arena, LMU shall submit an updated TDM plan to LADOT for approval detailing the actions to be taken during events: (1) held in the new sports pavilion, (2) open to the general public, and (3) expected to host 3,000 or more members of the general public (a "Special Public Event"). The actions taken for Special Public Events shall include the establishment of a "Special Public Event Traffic Route" that will divert Special Public Event-traffic to LMU Drive and Lincoln Blvd. and endeavor to reduce vehicles on 80th Street and Loyola Boulevard.</i></p> <p><i>The updated TDM plan shall also: (1) include a prohibition on the concurrent scheduling of events open to the general public (a "Public Event") at the Gersten Pavilion and the new sports arena and (2) review other scheduling considerations for Public Events at the Gersten Pavilion and the new sports arena. To limit the potential for the overlapping of Public Events at the Gersten Pavilion and the new sports arena, Public Events should be scheduled such that a Public Event held at either Gersten Pavilion or the new sports arena is not scheduled to start less than two hours after the scheduled end of a Public Event held at the other arena/pavilion.</i></p>
4.	<p>Parking & Traffic study required for ingress/egress, shared parking (including pick up/drop off), Ride Share access/staging,</p>	<p>LMU currently maintains an Event Parking Management Program to accommodate occasional university functions expected to bring non-campus registered vehicles and over 100 non-campus</p>

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
	<p>review of residential "Preferred Permit Parking Program" to analyze potential need for extension/expansion/hours of enforcement. On-site parking. Temporary event signage requirements. Restricted parking during events. Must be completed prior to issuance of building permits for the new Arena.</p>	<p>affiliated visitors onto Campus. In response to the Neighborhood Council's request, LMU revised its Specific Plan Amendment application to specify requirements for inclusion in the updated parking study that LMU must submit to LADOT prior to the construction of the new Arena.</p> <p><u>Revised Specific Plan Amendment Request</u></p> <p><i>J. Prior to the construction of a new sports arena, or a new conference center on the southwest side of University Hall, LMU shall submit an updated parking study to LADOT. The study shall also consider ridesharing, including access and staging, and its effects on local traffic. LMU shall provide any additional parking required by LADOT, if LADOT determines that such additional parking is needed.</i></p> <p><i>Prior to the construction of a new sports arena, or a new conference center on the southwest side of University Hall, the Event Parking Management Plan shall be updated as to such facility and the retention of Gersten Pavilion. The updated Plan shall also evaluate potential temporary event signage and be provided to the Council Office representing the Campus' District for a 30-day review period prior to review by LADOT.</i></p>
5.	<p>Gersten Pavilion renovation, expansion, repurposing as outlined in the proposal to include:</p> <ul style="list-style-type: none"> • Removal of permanent seating. • Upgrade of sports staff administrative offices. • Update of athletics training areas. • Reduction of courts to one for emergency game use only in the event the Arena is non operable. • Maximum capacity of attendance for emergency game use of to be defined and certified by the Los Angeles Fire Department. 	<p>In response to the Neighborhood Council's request, LMU amended its application to place restrictions on the retention of Gersten Pavilion in the event LMU constructs the new Arena. The University's current vision for the Gersten Pavilion renovation includes the upgrading of athletic department administrative offices and athletics training areas. As set forth in the revised Specific Plan Amendment application, LMU has agreed to remove existing fixed seating in the Gersten Pavilion prior to receiving a Certificate of Occupancy for the new Arena. While the Gersten Pavilion will not be restricted to "emergency game use," LMU will not re-install fixed seating following the issuance of a Certificate of Occupancy for the new Arena unless LMU suspends or discontinues the operation of the new Arena. As detailed in the proposed Amendment language below, LMU has also agreed to restrict the number of temporary seats that may be utilized in the Gersten Pavilion following construction of the new Arena and confirmed that any seating must be consistent with applicable Fire Department regulations.</p> <p><u>Revised Specific Plan Amendment Request</u></p> <p><i>G. Retention of the Gersten Pavilion. This Amended Specific Plan expressly authorizes the right to retain, renovate, continue to use, and/or change the use of the Gersten Pavilion. Notwithstanding the foregoing, there shall be no fixed seating in the Gersten Pavilion in the event a new sports arena is constructed and operated on Campus. Further:</i></p>

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
		<ol style="list-style-type: none"> 1. Existing fixed seating in the Gersten Pavilion shall be removed prior to the issuance of a Certificate of Occupancy for a new sports arena. 2. Fixed seating in the Gersten Pavilion may not be reinstalled following the issuance of a Certificate of Occupancy for a new sports arena unless LMU suspends or discontinues the operation of the new sports arena. 3. Temporary seating may be utilized in the Gersten Pavilion, but it shall not exceed 1,000 seats, and such seating shall be consistent with applicable Fire Department regulations. <p>...</p>
6.	<p>Updates to Gersten and the new Arena will be requiring an increase to the Master Plan of 174,000 square feet to the Athletics indoor space for a total of 366,000 square feet and a buffer of up to a 7.5% buffer for overrun. When LMU intends to use any overrun they must inform the NC and NAC which category the square footage is coming from. The increase would come from a comparable reduction in Academic/Administrative and Residential. However, the total for all three areas would not exceed the current 3,411,000.</p>	<p>In response to discussions with the Neighborhood Council, LMU revised its Specific Plan Amendment application to limit the flexibility to reallocate floor area amongst the Specific Plan land use categories. Consistent with the Neighborhood Council's condition, the revised Specific Plan would permit up to 366,000 square feet of floor area for Athletic Indoor uses with a 7.5% buffer for overrun. In order to utilize the 7.5% buffer, approval from the City Planning Director through the Specific Plan's Administrative Clearance process would be required. As detailed therein, LMU is required to provide a copy of the Administrative Clearance application to the Neighborhood Council when the application is provided to the Planning Director. See Specific Plan Section 8.1.2. If ultimately needed, the Administrative Clearance application will specify which land use category LMU will reallocate floor area from to account for the overrun.</p> <p><u>Revised Specific Plan Amendment Request</u></p>

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
-----	----------------------------------	---

Table No. 2
Permitted Combined (Existing + New) Floor Area by Land Use Category

Facilities	
Land Use	Combined (Existing + New) Floor Area (sf)
Academic / Administrative	1,847,000
Residential	1,198,000
Athletic Indoors	366,000
Total Combined (Existing + New) Floor Area Permitted	3,411,000

*The Director may approve up to a 7.5% increase in (1) the permitted "New Floor Area" for Athletic Indoors (up to a 15,000 square foot increase) and/or (2) the permitted "Combined (Existing + New) Floor Area" for Athletic Indoors (up to a 27,450 square foot increase) through the Administrative Clearance process detailed in Section 8.1 of the Specific Plan; provided, however, in no event shall: (1) the total New Floor Area for all three land use categories in Table 1 exceed 1,779,000 square feet or (2) shall the total Combined (Existing + New) Floor Area permitted for all three land use categories in Table 2 exceed 3,411,000 square feet.

...

7. No spectator vehicle use of Loyola Gate for Arena activities.

Section 5.1 of the current Specific Plan (reproduced below) restricts use of the Loyola Boulevard gate. LMU is not requesting any amendments to these restrictions in connection with its Specific Plan Amendment application. Further, in response to the Neighborhood Council, LMU revised its Specific Plan Amendment application to require LMU to submit an updated parking study to LADOT prior to the construction of the new Arena. As detailed above, the new parking study requires analysis of a number of considerations for the benefit of the neighborhood.

Existing Specific Plan Language

Section 5.1 VEHICULAR AND PEDESTRIAN CIRCULATION PLAN/ACCESS.

A. LMU Drive shall be the primary vehicular route for visitors, deliveries, and truck traffic to Campus. Loyola Boulevard shall be a gate-controlled access route.

1. Vehicular use of the Loyola Boulevard campus entrance shall be restricted to a limited number of vehicles, and LMU shall utilize keycards, color coded parking stickers, or a similar system to separately identify the vehicles authorized to enter and exit the campus via the

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
		<i>Loyola Boulevard gate. All other vehicles shall be required to use the LMU Drive entrance from Lincoln Boulevard, except for emergency and maintenance vehicles as necessary.</i>
8.	No grass parking except for graduation.	As discussed above, LMU implements an Event Parking Management Program to accommodate certain university functions. As detailed above, pursuant to the revised Specific Plan Amendment application, LMU will update this Event Parking Management Program in advance of construction of the Arena. The updated Program will specify that grass parking will only be available for graduation.
9.	Advanced notification to the community of Arena events.	LMU currently maintains a publicly available online "Events Calendar" (available at https://cal.lmu.edu/). LMU will continue to make its Events Calendar available and will include public events at the Arena on the calendar following the Arena construction.
10.	No rideshare standing/drop-offs/pickups for persons or property on 80th St. and intersecting streets surrounding the University.	As discussed above, LMU currently maintains an Event Parking Management Program to accommodate occasional university functions expected to bring non-campus registered vehicles and over 100 non-campus affiliated visitors onto Campus. In response to the Neighborhood Council's request, LMU revised its Specific Plan Amendment application to require LMU to submit an updated parking study to LADOT prior to the construction of the new Arena. The new parking study is required to consider ridesharing, including access and staging, and its effects on local traffic. LMU will incorporate the findings of the parking study into its Event Parking Management Program in consultation with LADOT.
11.	Committee recommends a minimum two-hour traffic buffer zone between events at the Arena to allow for traffic flow.	As described above, LMU amended its Specific Plan Amendment to require the submittal of a new TDM Plan to LADOT for approval prior to the construction of the new Arena. LMU also amended its application for Specific Plan Amendment to manage scheduling of "Public Events" at the Gersten Pavilion and the new Arena. Specifically, the proposed TDM Plan is required to "(1) include a prohibition on the concurrent scheduling of events open to the general public (a "Public Event") at the Gersten Pavilion and the new sports arena and (2) review other scheduling considerations for Public Events at the Gersten Pavilion and the new sports arena. To limit the potential for the overlapping of Public Events at the Gersten Pavilion and the new sports arena, Public Events should be scheduled such that a Public Event held at either Gersten Pavilion or the new sports arena is not scheduled to start less than two hours after the scheduled end of a Public Event held at the other arena/pavilion."

No.	Neighborhood Council "Condition"	LMU Response and Specific Plan Language
12.	All conditions remain in effect throughout the term of the Master Plan.	Following approval of its proposed Specific Plan Amendment by the City, LMU will continue to adhere to its Specific Plan requirements and associated Development Agreement.