

SUMMARY OF PLANNING COMMISSION PUBLIC HEARING COMMENTS AND STAFF RESPONSES

On September 28, 2026, the Planning Commission conducted a duly noticed public hearing to consider the Media District Specific Plan Update (MDSP Update), Final Program Environmental Impact Report (Final EIR), and related implementation actions. The following summarizes the comments and questions raised during the hearing and provides additional information in response. Related comments have been grouped by topic for clarity.

1. Hotel Development, Development Agreements, Housing and Community Benefits

Comments/Questions Raised. Several speakers affiliated with UNITE HERE Local 11 requested that future hotel projects in the Media District be required to enter into Development Agreements with the City. Commenters stated that Development Agreements could provide certainty regarding community benefits, including local hiring and transit commitments, and referenced hotel projects in Burbank and practices in neighboring jurisdictions. Commenters also discussed the relationship between hotel development and housing production, expressing concern that sites developed with hotels may otherwise represent opportunities for housing and that the City should consider those tradeoffs before hotel projects are approved. Commenters pointed out that several hotel developments within the City were approved under the Planned Development/Development Agreement process. During deliberation, the Planning Commission also discussed whether hotel development should automatically require a Development Agreement.

Staff Response.

Proposed MDSP Regulations for Hotels

The MDSP Update establishes the land-use framework applicable to future development within the Specific Plan Area. Uses in the MDSP's nonresidential zones are governed by the permitted-use provisions of MDSP Chapter 6 and remain subject to applicable City review procedures and other local, State, and federal requirements. As currently proposed on the MDSP's land use table, hotels are subject to the review and approval of a Conditional Use Permit (CUP), which is a discretionary review permit. The CUP for hotel projects is subject to review by the Planning Commission and can be appealed to the City Council.

Development Agreements in Burbank

In the City of Burbank, a Development Agreement is a separate negotiated mechanism and is not automatically required solely because a proposed use is a hotel. In the City of Burbank, Development Agreements are voluntary tools used primarily for complex or long-term developments. The City of Burbank has not historically imposed a Development Agreement on a specific use.

Requiring a Development Agreement for every future hotel project would therefore represent an additional policy choice beyond the land-use entitlement framework Citywide and beyond what is presently proposed in the MDSP Update and would deviate from all prior publicly available drafts. Further, the policy choice to impose a Development Agreement for hotel use

only would be made independent from the public process that the MDSP was crafted through and would be made without any notification to the many engaged stakeholders that have participated in the process over the past four years. The Sustainable Infrastructure Alternative retains the same assumption of 400 hotel rooms/keys evaluated under the proposed Project while substantially reducing anticipated residential and other nonresidential development through the Projects planning and implementation horizon of 2035.

Response to Claims that other nearby Cities require Development Agreements for Hotels

The comments regarding local hiring, transit commitments, housing opportunity, and other potential community benefits identify policy considerations the City Council may consider in determining whether additional requirements for future hotel development are warranted as part of separate community benefits efforts. Staff investigated hotel regulations in nearby cities, including Los Angeles, Glendale, Pasadena, Culver City and found that none of these cities automatically require a Development Agreement to construct or operate a hotels. Rather, in these communities hotels are regulated through typical land use entitlements, such as a Conditional Use Permit or Design Review and must comply with all applicable objective development standard. Staff was unable to substantiate that Development Agreements were mandated for hotel uses. Under California law (Gov. Code § 65865), a Development Agreement is a voluntary, discretionary contract between a local jurisdiction and a developer. It is typically utilized when a major project needs vested rights over an extended timeline, customized public benefit contributions, or complex phased approvals or to negotiate development standards and public benefits.

However, staff did find that several other cities, including Los Angeles and Glendale, have separate Labor Ordinances for hospitality workers which broadly apply to a variety of hospitality uses, including hotels. For example, the City of Los Angeles has the “Hotel Worker Minimum Wage Ordinance, the Hotel Worker Protection Ordinance, the city of Glendale has the Hotel Worker Protection Ordinance, and Pasadena has a citywide Minimum Wage Ordinance. These ordinances establish clarity and certainty for applicants and hospitality workers, which differs from the uncertainty associated with negotiation that would apply to the Development Agreement process. In addition, the cities of Santa Monica, West Hollywood, Long Beach, Anaheim, Irvine, and unincorporated Los Angeles County also have varying levels of similar regulations.

2. Infrastructure Capacity, Funding, Sequencing and Accountability

Comments/Questions Raised. Several commenters questioned whether sewer, electrical, transportation, and other infrastructure improvements would be available when development occurs; how necessary improvements would be funded; and what would occur if development precedes infrastructure improvements. Commenters requested clearer sequencing of implementation actions and ongoing accountability, including future City Council review of growth and infrastructure commitments. The Planning Commission similarly asked about longer-term implementation of the SIA and expressed interest in future reporting on the City's efforts to better align land-use planning with infrastructure planning.

Staff Response. Infrastructure analysis was a central component of the MDSP Update and Program EIR. Technical studies evaluated electric, water, wastewater, and transportation conditions and needs at the Specific Plan level and cumulatively with other major specific planning efforts. Those studies informed development of the SIA, which reduces anticipated growth to account for current infrastructure capacity and for practical limits on infrastructure improvements that can feasibly be completed within the 2035 planning horizon. The studies also provide information that can help identify project-level infrastructure requirements, update objective infrastructure standards, evaluate appropriate and proportional development impact fees, and inform the City's Capital Improvement Program.

Staff emphasized that implementation of the MDSP is incremental and with physical construction driven by private development investments. Regulatory provisions take effect with adoption, while future programs and capital improvements may require additional analysis, prioritization, funding, and separate City action through departmental work programs, annual budgets, and capital improvement master planning. Adoption of the MDSP Update itself does not authorize or fund all future infrastructure improvements. Staff acknowledged the interest expressed by both commenters and the Planning Commission in continued transparency and coordination among long-range land-use assumptions, infrastructure capacity, capital master planning, and implementation and reminded the Planning Commission that an implementation program item for the MDSP Update included a requirement for the Planning Commission to review the City's Capital Improvement Plan on an annual basis before it is presented to the City Council. This review will ensure better alignment between capital improvements and land use development.

3. SIA Growth Assumptions in the Policy Documents, State Housing Laws, and SB 79

Comments/Questions Raised. Commenters requested additional explanation regarding where anticipated SIA growth would occur and how the environmental analysis relates to additional development potential that may arise under State housing laws, including SB 79 and other streamlined or ministerial housing statutes. Concerns were also expressed regarding how development occurring through State-law pathways could affect infrastructure capacity, implementation, and the fiscal implications of future infrastructure improvements.

Staff Response. The SIA establishes the development assumptions evaluated for purposes of the MDSP Update and its Program EIR through the 2035 planning horizon. It reduces anticipated development from 9,702 residential units and approximately 3.99 million square feet of nonresidential development under the originally proposed Project to 2,258 residential units and approximately 684,245 square feet of nonresidential development, while retaining 400 hotel rooms/keys. The SIA is a coordinated land use strategy that was developed to better align anticipated growth with existing and planned utility infrastructure and capacity in the MDSP, the Golden State Specific Plan and Downtown Transit Oriented Development Specific Plan that can feasibly be available during the Plan horizon. Potential development that may occur pursuant to State housing laws involves separate statutory requirements and may not be controlled by the development assumptions or discretionary review procedures established by the MDSP.

The City is separately evaluating the potential implications of SB 79, including through ongoing environmental analysis. The City is also engaged in pending litigation concerning LA Metro's proposed BRT project and SCAG's SB 79 eligibility mapping. Those matters are separate from the MDSP Update. More broadly, State housing laws increasingly establish streamlined or ministerial approval pathways that can limit local discretionary review and, depending on the applicable statute, may limit or exempt project-level CEQA review. The City must therefore continue to monitor State law, development activity, and infrastructure conditions and respond to applications consistent with applicable law. The MDSP infrastructure studies and implementation framework provides a planning foundation for that ongoing work, but do not purport to predict or eliminate development potential that may arise independently through evolving State law.

Importantly, a significant component of implementing the MDSP Update is the proposed Zone Text Amendment, which, among incorporating many other aspects of the Policy document by reference into the Zoning Code, would also incorporate the specific mitigation measures from the MDSP Final EIR that fall under the responsibility of the developer. By incorporating these mitigation measures by reference, they become objective development standards that the City may enforce, ensuring that regardless of what path a project takes through the permitting process, that those applicable environmental mitigation measures will still be followed.

4. Wildfire Evacuation, Emergency Access, Public Services and Neighborhood Protection

Comments/Questions Raised. A commenter requested that the City not certify the Final EIR until additional public-safety analysis is completed and neighborhood protection measures are incorporated. The commenter questioned whether residents and occupants could safely access evacuation routes while firefighters and other emergency responders enter the area during a wildfire or other emergency; questioned reliance on evacuation information prepared before more recent fire-hazard mapping; identified potential choke points and transportation changes affecting the Burbank-Toluca Lake neighborhood; and questioned whether public services and infrastructure adequately account for future growth.

Staff Response. These issues were also raised in written comments on the Recirculated Draft EIR and are addressed in the Final EIR Responses to Comments. The Recirculated Draft EIR evaluated wildfire and emergency-access impacts at the program level for each Project alternative using the applicable CEQA significance criteria. The City's response explains that detailed evacuation conditions during a future wildfire depend on site- and incident-specific factors—including the location and design of future development, weather and fire conditions, emergency-response actions, and roadway conditions at the time of an event—that are not known at the programmatic planning stage. For the same reason, the Final EIR concludes that the program-level analysis provides the appropriate level of analysis for the alternatives evaluated in the Program EIR.

Further, preparing analysis of how the environment could impact the Project is considered "reverse CEQA." The "reverse CEQA" argument posits that the California Environmental Quality Act should require lead agencies to evaluate how existing environmental conditions

(such as ambient air pollution, noise, or natural hazards) might impact a proposed project's future occupants. However, the California Supreme Court largely rejected this theory in *CBIA v. BAAQMD* (2015), ruling that CEQA strictly mandates analyzing a project's impact on the environment, not the existing environment's impact on the project—unless the project itself worsens those existing hazards. No argument has been made that the MDSP Update can worsen the risk of wildfires in adjacent cities, which would then affect the plan area.

The SIA further reduces anticipated development compared with the proposed Project and was developed specifically to better align anticipated growth with infrastructure that can feasibly be available through 2035. The detailed written responses contained in the Final EIR remain the City's response to the CEQA issues raised regarding wildfire, evacuation, and emergency response and access, and are incorporated by reference rather than repeated in full here.

5. Media District Workforce Displays and Creative Signage

Comments/Questions Raised. A representative of the International Alliance of Theatrical Stage Employees requested that the MDSP provide opportunities for professionally designed, street-level displays along Olive Avenue recognizing the Media District's film and television workforce through paid promotional agreements, together with any corresponding Code amendments necessary to implement the concept.

Staff Response. Staff acknowledges the request and the potential relationship between creative signage and the Media District's identity as a major center of film and television employment. The MDSP Update before the City Council is not intended to establish a new district-specific off-site advertising program as part of the current adoption action. Separately, the City is in the process of considering a broader creative signage/off-site advertising program informed by programs in jurisdictions such as West Hollywood and Santa Monica. That process provides an opportunity to evaluate potential creative-signage concepts, appropriate locations, design standards, community benefits, and regulatory requirements on a comprehensive basis. The workforce-display concept raised at the Planning Commission hearing can therefore be considered in connection with that ongoing City effort without requiring the current MDSP Update to establish a separate advertising framework.

6. Planning Commission Recommendation and Follow-Up

Following public testimony and deliberation, the Planning Commission voted 5-0 to adopt the resolution as presented and recommend City Council certification of the Final EIR and approval of the General Plan Amendment, MDSP Update, and implementing Ordinance. The Commission's principal discussion included the treatment of hotel uses and Development Agreements, longer-term implementation of the SIA, and continued coordination of land-use and infrastructure planning. The Commission expressed interest in future updates regarding the City's broader efforts to better align long-range land-use planning, infrastructure capacity, and investment.