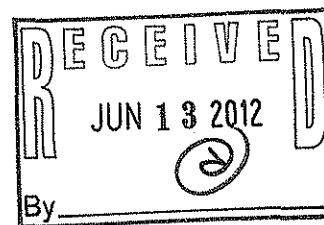


ORIGINAL

LAW OFFICE OF
CHRISTOPHER SUTTON
586 LA LOMA ROAD
PASADENA, CALIFORNIA 91105-2443
TELEPHONE (626) 683-2500 ... FACSIMILE (626) 405-9843
christophersutton.law@gmail.com

#13



Wednesday, June 13, 2012
HAND DELIVERED

Los Angeles City Council
Los Angeles City Hall, Room 1050
100 North Spring Street
Los Angeles, California 90012

Re: **Violations of California Environmental Quality Act ("CEQA")**
Olympic North Hotels Project and \$21.9 Million In City Subsidies
Council Agenda Item 13, File No. 11-0966

Dear Member of the City Council:

This office has been retained by Today's IV, Inc., doing business as the Westin Bonaventure Hotel and Suites. The City is proposing to violate the California Environmental Quality Act ("CEQA") by failing to conduct required environmental review for the Olympic North Hotels Project and the proposed \$21.9 million in City subsidies.

One stated purpose of these subsidies is to allow and mandate that the new hotels will offer rooms at **rates below those of other hotels in the area**. This is a subsidy to destroy the revenue of existing hotels. The City staff and consultants have failed to analyze the environmental impacts when existing hotels are forced out of business by these subsidies from the City allow below market prices for hotel rooms. These subsidies are designed to injure the existing hotels and motels. Several have already been put out of business by past City subsidies. There are been no analysis of the impact past subsidies on killing hotels and jobs. These subsidies will cause significant community displacement and loss of jobs at existing hotels. There has been no environmental analysis of these impacts. In violation of City law the staff has failed to prepare a Community Impact Statement despite the need for such a statements when business and jobs will be killed by the City subsidies. The prior approvals in City Council file number 09-3070 did not analyze the design or parking requirements and traffic generation of these two new subsidized hotels. These new hotels were not yet designed and no environmental review was possible. A full environmental impact report or other additional environmental review is required by CEQA. Please vote NO on this risky, defective, and illegal subsidy project.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Sutton".

Christopher Sutton

cc: clients

#13

Good morning councilmembers. My name is Arnie Corlin

As a real estate investor, it is important for me to identify my Return on Investment. This should also be true of the public sector in order for it to lower its cost of serving their constituency.

I have regularly volunteered for LAPD and various communities around the city for a number of years working to contact asset managers on hundreds of foreclosed properties. Then as a peer, share best practices to resolve the nuisance issues.

I would strongly suggest that the return on investment for the city by responsibly creating a self registry database for asset managers at no charge, would be greater than charging those attempting to do the right thing and register.

Those higher fees, come at a price for the city and are the reason why many of us who give back to the community no longer invest in the City of Los Angeles.

However, due to the lack of proper response by many of these asset managers I would suggest following four items;

1. Lack of registry compliance should warrant a fine higher than that of \$155 and possibly escalating over reasonable time periods. An ordinance should include a lien against the property.
2. If nuisance issues occur and the representative has registered and there is a lack of response to resolve nuisance issues, a fine should also be instituted.
3. If there is no registration, complaints of nuisance issues occur AND there is no response from an asset manager I would suggest making that a misdemeanor, a very large fine and a lien against the property.
4. Currently there is no proper efficient means for asset managers to learn how to properly control many of these nuisance issues. Nor is there an efficient and proper manner to contact resources such as their LAPD Senior Lead Officer.

Offer everyone ^{THE} ~~voluntary~~ ability to succeed. Classes should be offered to teach asset managers how to address nuisance issues, work with the city, especially law enforcement and the communities.

I believe doing so in this manner will not disincentivize responsible investment and also help improve the value of the properties, including the tax base you rely on.

HCED 6-13-2012

