

May 3, 2016

Doug Haines
La Mirada Ave. Neighborhood Assn.
P.O. Box 93596
Los Angeles, CA 90093-0596

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Los Angeles City Council
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

RE: Council File 16-0033; Case No.: CPC-2015-74-GPA-CUB-SPP-SPR; CEQA No.: ENV-2008-1421-EIR. Project location: 5500-5544 Sunset Blvd., 1417-1441 N. Western Ave., 1414 St. Andrews Pl., and 5505-5545 De Longpre Ave.

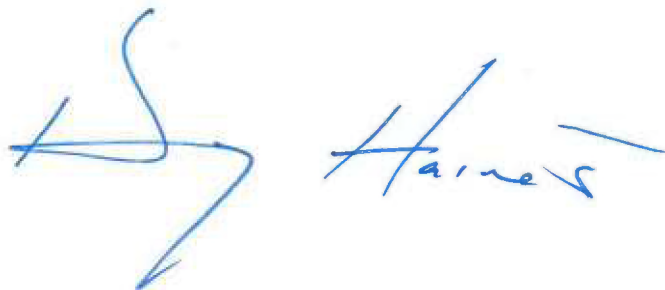
President Herb J. Wesson, Jr., and Honorable Council members:

Please note the following attachments detailing the projected cost of covering childcare for employees of the proposed Target at Sunset and Western project. As noted in the email exchanges between staff at Council District 13 and Target Corporation representatives, the City estimates that an adequate childcare facility serving Target's employees would require an in-lieu fee payment by Target of \$2.8 million.

Target instead offered \$179,000.

Please reject as unjustified Target's request for its myriad entitlements for the proposed Target.

Thank you,

A handwritten signature in blue ink, appearing to read "Haines", with a large, stylized flourish to the left.

I feel like we are now regressing here because Darryl Ford was in agreement with the methodology, the fee as well as the way we were distributing the funds. However, Valerie Flores of the City Attorney's office stated that she thought the fee was not adequate.

However she had no nexus studies or data to back-up her conclusion.

Please let me know if we need to bring in our consultants for another meeting to discuss to get back on track with this?

Best regards,

Kareem

Kareem Ali | Sr. Real Estate Manager | Real Estate | ©Target Corporation

From: Gary Benjamin [mailto:gary.benjamin@lacity.org]
Sent: Friday, May 08, 2015 5:11 PM
To: Kareem.Ali
Cc: Doug Couper; Richard Schulman
Subject: Target - SNAP Childcare Facility issue

Hello Kareem,

I had a meeting with Ken Fong, Darryl Ford from Rec & Parks and Blake Lamb to discuss the Childcare Facility requirement in the SNAP. We discussed the three options for fulfilling this requirement, which must be addressed before the project is given a C of O.

1. Target builds an adequate childcare facility on site.
2. Target acquires and equips an adequate childcare facility offsite within the required radius. This could be a ground-up construction or simple purchase and conversion of single-family home properties, brought up to code standards and turned over to an operator to manage. Preferred admission should be arranged for children of Target employees.
3. Target reformulate their fee study to reflect the actual cost of developing a childcare facility. The existing HR&A study suggests that the cost for developing a childcare facility to accommodate 60 children is \$2.8 million, but only recommends a \$179,000 in-lieu fee. The fee proposed by Target must be defensible and acceptable to the Rec & Parks Commission. According to Darryl Ford, the previous fee was not thought adequate. The

Commission would have to vote to accept the fee, which would then go to the Dept. of Rec & Parks, to then be dispensed to a childcare non-profit in the area.

We would like to get this straightened out sooner rather than later, as we don't want it still looming as the project nears completion. Could you please determine what path would be most preferable to Target and then get back to me?

Gary

—
Gary Benjamin

Planning Deputy

LA City Council District 13

Office: (213) 473-7569

Cell: (213) 265-6353

gary.benjamin@lacity.org

Find the Councilmember on Facebook, Twitter and YouTube!

—
Gary Benjamin

Planning Deputy

LA City Council District 13

Office: (213) 473-7569

Cell: (213) 265-6353

gary.benjamin@lacity.org

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Chris Robertson <chris.robertson@lacity.org>

Questions from SNAP Peer Review Consultant

3 messages

Stephanie Magnien Rockwell <stephanie.magnien@lacity.org>

Tue, Apr 19, 2016 at 10:58 AM

To: Chris Robertson <chris.robertson@lacity.org>

Cc: Josh Rohmer <josh.rohmer@lacity.org>, Jacqueline Wagner <jacqueline.wagner@lacity.org>

Hi Chris,

Economic and Planning Systems has a few questions for us to help their evaluation along. Are you available tomorrow at 2:30 for a conference call? Here is what we'll be discussing, attached is the HR&A study commissioned by Target. Can you weigh in on questions 1, 2 and 4?

1. Shift away from the City's Proposed In-Lieu Standard

The HR&A analysis argues that the space requirements specified in the SNAP (Section G1, pages 10 and 11) are inappropriate as: (a) there is no rationale provided, and (b) the standard is high relative to other child care facilities fee studies. Is the City comfortable with shifting away from the specified standard and effectively developing a new standard based on a demand-based analysis of the type proposed by HR&A? On a related note, has the City established child care facility in-lieu requirements in other parts of the City or any other general policy language that would support a particular approach or standard?

2. Implications of Proposed HR&A Approach for the rest of SNAP

The purpose of the peer review is to determine whether the proposed approach is reasonable for this one development project. It is likely that the acceptance of a new approach will be sought by other development applications if the terms of the fee calculation are available. Is the City comfortable with the application of this alternative approach to the rest of SNAP? Because the HR&A analysis is focused on one specific development with a particular land use/ tenant, some refinements would be required from this approach for application to other SNAP developments. Is the City comfortable with a continued project-by-project approach or would a SNAP-wide approach and fee schedule be preferred? Will the City maintain its current in-lieu standard (Section G4) and ordinance even if an alternative approach is accepted?

3. Prior Communications between HR&A and City Attorney/Staff

The HR&A Analysis references an earlier draft and comments by the City Attorney. It would be helpful to know more about the key points of discussion and outcomes and how that review informed/guided HR&A's analysis.

4. Specific Fee Program Parameters


Selected questions concerning the In-Lieu Fee Ordinance and general information the City may be able to provide include:

- a. Please tell us more about the "existing" space (59,561 sq. ft.). Is it currently occupied? Do the existing uses (59,561 sq. ft.) have access to a child care facility that meets the requirements of Section G? Is it the City's intention to net out the existing square footage in calculating the fee as assumed in the HR&A analysis?
- b. Has the City developed (or been a partner in the development of) any child care facilities to use as cost comparables?

c. Will the City collect the total fee obligation from the developer at the time of building permit? How will the police substation square footage affect the fee calculation? Will exemptions be provided for public uses?

d. Can you confirm that the estimate of Project employment (250 employees per the EIR) includes the police substation (109 sq. ft.) and the other retail (29,446 sq.ft.)?

Stephanie Magnien Rockwell
Office of the City Administrative Officer | City of Los Angeles
Asset Management
(d) 213-473-9729 (f) 213-473-7515
200 North Main St. Suite 1500 LA 90012

 **HR&A Child Care In-Lieu Fee Report for the Sunset & Western Target Devel... (3).pdf**
1255K

Chris Robertson <chris.robertson@lacity.org> Tue, Apr 19, 2016 at 11:19 AM
To: Stephanie Magnien Rockwell <stephanie.magnien@lacity.org>
Cc: Josh Rohmer <josh.rohmer@lacity.org>, Jacqueline Wagner <jacqueline.wagner@lacity.org>

Hi Stephanie,

Thanks for reaching out. Yes, I am available to discuss this tomorrow at 2:30.



Chris Robertson, AICP, LEED AP
Planning Director
Office of Councilmember Mitch O'Farrell, 13th District
200 N. Spring Street, Room 480, Los Angeles, CA 90012
(213) 473-7013 w | (213) 265-6353 c | www.cd13.org



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Stephanie Magnien Rockwell <stephanie.magnien@lacity.org> Tue, Apr 19, 2016 at 11:21 AM
To: Chris Robertson <chris.robertson@lacity.org>

Great, thank you. I just sent you a calendar invite with the call-in instructions.

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