

# Craig Lawson & Co., LLC

Land Use Consultants

A6

August 8, 2017

VIA EMAIL to [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org)

Honorable Jose Huizar, Chair  
Planning and Land Use Management ("PLUM") Committee  
Los Angeles City Council  
c/o Office of the City Clerk  
City Hall, Room 395  
200 North Spring Street  
Los Angeles, CA 90012  
Attention: Zina Cheng, Legislative Assistant

Date: 8/8/17  
Submitted in PLUM Committee  
Council File No: 16-0503  
Item No.: 6

Communication from  
Applicant Representative

**PLUM Meeting:** August 8, 2017, Item No. 6  
**Council File No.:** CF 16-0503  
**Case No.:** ENV-2014-2392-MND-1A  
**Applicant:** A Community of Friends  
**Subject Site:** 3401-3415 E. 1<sup>st</sup> Street and 116-126 N. Lorena Street

Dear Honorable Members of the PLUM Committee:

I am writing on behalf of A Community of Friends (the "Applicant") in relation to the above-referenced matter.

This morning we were informed by the staff to the PLUM Committee Chair that the hearing scheduled for today on this item is being postponed in response to a letter from the Silverstein Law Firm stating that neither it nor its client received a mailed notice of the public hearing. For the record, on July 31, 2017 both the Applicant and my office received the written Notice of Public Hearing, as dated July 28, 2017.

We strenuously object to postponement of the hearing based on any notice issues – as set forth below, notice of this hearing was more than adequate.

The Silverstein Law Firm has stated in its May 16, 2017 and August 7, 2017 letters that it represents the El Mercado de Los Angeles (known as "El Mercado"). Based upon our review of the public records, the owners of the El Mercado property are Pedro M. & Mercedes L. Rosado.<sup>1</sup> The City Clerk's mailing list (attached to the Notice of Public Hearing) shows clearly that Notice of Public Hearing was mailed to Pedro M. & Mercedes L. Rosado. Accordingly, there is no factual basis to the claim by the Silverstein Law Firm for the postponement.

<sup>1</sup> It is our understanding that Pedro Rosado has passed away, but the public records still show him as an owner along with Mercedes Rosado.

The PLUM Committee Agenda was issued and posted on Friday, August 4, 2017 thus fulfilling the 72-hour notice requirement under the Brown Act. The City Clerk has fulfilled all legal noticing requirements and the public hearing should take place today.

Furthermore, the Brown Act provides that, with respect to persons who request notice of any hearing, "Failure of the requesting person to receive the agenda or the agenda packet pursuant to this section shall not constitute grounds for invalidation of the actions of the legislative body take at the meeting for which the agenda or agenda packet was not received." *Govt. Code 54954.1*

The request for postponement by the Silverstein Law Firm is yet another tactic to delay the approval of the Lorena Plaza project.

For the record, we object to the postponement of the hearing. If it is postponed, the hearing must take place at the next PLUM Committee meeting on August 15, 2017. This project has been substantially delayed, and we object to it being delayed further.

Sincerely,

*Craig Lawson*

Craig Lawson  
President

cc: Honorable Jose Huizar, City Councilmember (Attn. Paul Habib, Chief of Staff; Shawn Kuk, Planning Director; Kevin Ocubillo, Planning Deputy)  
Honorable Marqueece Harris-Dawson, City Councilmember  
Honorable Robert Blumenfield, City Councilmember  
Honorable Mitchell Englander, City Councilmember  
Honorable Curren D. Price, Jr., City Councilmember  
Vincent Bertoni, Director of Planning, Department of City Planning  
Kevin Keller, Executive Officer, Department of City Planning  
Shana Bonstin, Department of City Planning  
Blake Lamb, Department of City Planning  
Terry Kaufmann-Macias, Office of the City Attorney  
Dora Leong Gallo, A Community of Friends  
Mitchell B. Menzer, Esq.  
Tony Locacciato, Meridian Consultants