

July 2, 2018

**VIA EMAIL**

Los Angeles City Council  
Planning and Land Use Management Committee  
c/o Los Angeles City Council Clerk  
City of Los Angeles  
200 N. Spring Street, Room 395  
Los Angeles, California 90012

Re: Response to Coalition to Preserve LA Letter: Council File 18-0269-S1 and 18-0269

Dear Honorable City Councilmembers:

This firm represents Lightstone DTLA LLC ("Applicant") regarding the Fig+Pico Conference Center Hotels project ("Project") located in the South Park area of the City of Los Angeles ("City"). The Project creates up to 1,153 hotel rooms and approximately 13,145 square feet of retail uses within two hotel towers located directly east of the Los Angeles Convention Center ("LACC") and adjacent to the Metro Pico Station. This letter responds to a questionable and late-hit letter submitted by the Coalition to Preserve LA ("Coalition") on June 18, 2018 objecting to the Project. We demonstrate below that the Coalition letter lacks merit and smacks of California Environmental Quality Act ("CEQA") abuse.

The City has completed nearly three years of administrative procedure for the Project. The City has already certified the Environmental Impact Report ("EIR") and approved the Project and its entitlements. The City has filed several Notices of Determination regarding its approvals, and certain statute of limitations have expired. At this time, the only item that remains open for City action is the final read of the Development Agreement and the Sign District ordinance as to form and legality. The Coalition did not object or appeal at any point in the past, and has failed to exhaust its administrative remedies.

We also point out that the Coalition is an anti-development shell organization. With respect to this Project, its arguable whether the Coalition has legal standing to challenge. More generally, the Coalition is integrally intertwined with the AIDS Healthcare Foundation ("AHF"), which has illicitly waged war against the City's land use practices and projects. In doing so, AHF has strayed far from its stated mission to rid the world of AIDS. Propping up the Coalition, as AHF's anti-development front, is no less distasteful.

A few simple points tell the story behind the front. For example, the attorney who prepared the Coalition's letter (Liza M. Brereton) is AHF's in-house lawyer. The Coalition's own letterhead contains the office address for AHF's legal department. The Coalition (via Jill Stewart: Coalition Executive Director) and AHF (via Michael Weinstein: AHF President) currently

partner to oppose other important developments in the City. For this Project, it is apparent that the Coalition lost sight of even its own mission (genuine or not) to advocate for smart land use planning. See Exhibit 1: Coalition Background Information. As a side note, we point out that the old articles (regarding signage) attached to the Coalition's letter are from Ms. Stewart's prior employer the LA Weekly newspaper. All in all, the facts demonstrate that the Coalition's attempts to oppose the Project are in bad faith, let alone lacking legal merit.

Unfortunately, CEQA abuse like this is common. We incorporate by reference "In the Name of the Environment: How Litigation Abuse Under the California Environmental Quality Act Undermines California's Environmental, Social Equity, and Economic Priorities – and Proposed Reforms to Protect the Environment from CEQA Litigation Abuse" by Holland & Knight, if needed to illustrate the extent of abuse. These tactics, however, typically fail in the face of lawful process and substantive compliance with applicable law. The City and the Project have done both here.

The responses below prove that the Coalition's letter is baseless.

We respectfully request the Planning and Land Use Management ("PLUM") Committee and City Council approve the Development Agreement and Sign District ordinance as to form and legality at the hearings on July 3, 2018 to conclude this administrative process.

## **I. DEVELOPMENT AGREEMENT**

After nearly three years of administrative procedure – with zero involvement from the Coalition – it now ironically claims that the notice for the Development Agreement harms public participation in the process. Specifically, the Coalition objects to the lawful City Council action that shortened the notice period before public hearing from 24 to 10 days. State law (Government Code Section 65091) permits such action. It should also be noted that the 10-day notice issue raised by the Coalition is merely the notice period for the final hearing as to the form and legality of the Development Agreement. The City Council previously acted upon the substance of the Development Agreement on May 18, 2018 and instructed the City Attorney to prepare the ordinance authorizing execution of the Development Agreement by the parties.

In addition, the Development Agreement has been available for public review and comment for nearly four months. The City attached a copy of the draft Development Agreement to its staff report for the March 8, 2018 City Planning Commission hearing. Further iterations of the Development Agreement have been available to the public since May 10, 2018 in advance of the May 15, 2018 PLUM Committee hearing. Moreover, the City held three hearings (i.e., City Planning Commission, the PLUM Committee, and full City Council) to consider the Development Agreement. There has been no legitimate opposition to it. And, the Coalition was absent from all hearings, did not utter a word, or submit any correspondence regarding the Development Agreement or the associated public process. So, the Coalition's late argument that the City designed the notice process to quash public participation is simply frivolous.

Finally, the Coalition's objection to the 10-year term of the Development Agreement barely warrants a response. Nonetheless, we point out that a 10-year term for Development

Agreement is common practice in the City and is an absolutely reasonable term for securing vested rights in cyclical real estate markets. Similarly weak, the Coalition's claim that there are not sufficient public benefits associated with the Development Agreement fails because the Development Agreement and Project: (1) provide over \$1.3 million in direct public benefit payments and improvements; (2) create thousands of temporary and permanent jobs; and (3) generate approximately \$158 million in net new revenue for the City, amongst numerous other public benefits associated with the development.

## II. HOTEL DEVELOPMENT INCENTIVE AGREEMENT

Without any evidence, the Coalition makes several claims that the public subsidy for the Project is improper and unsupported. Strong facts and substantial evidence demonstrate that the complete opposite is true. Council File No. 16-0073 (the contents of which we incorporate herein by reference) is chock-full of financial analyses and documents that prove the Hotel Development Incentive Agreement ("HDIA") is warranted.

Initially, the Coalition claims the subsidy is government waste and does not have a public benefit. Simply put, the HDIA creates revenue for the City regardless of the subsidy component. The financial facts include, but are not limited to: (a) the Project will generate \$12.5 million in net new revenue for the City in its first year, compared to \$174,000 that the site generates annually for the City currently; (b) even with the subsidy that the Coalition complains about, the Project provides \$158 million net present value to the City during a 25-year operating period; and (c) the Project helps recapture billions of dollars of lost revenue that the City forgoes due to inadequate hotel rooms near the LACC, as concluded by the Los Angeles Tourism & Convention Board. Therefore, the public subsidy in the HDIA cannot be considered government waste.

The HDIA is also justified by substantial public benefits. In its November 21, 2017 report, the Chief Legislative Analyst ("CLA") found that the Project includes, at least, the following public benefits: (a) substantial job creation; (b) critical hotel support for the LACC; (c) living wage and local hire elements for employees; (d) union labor agreements and benefits; and (e) room block agreements for the 2028 Olympic and Paralympic Games. These benefits are in addition to the financial resources (described above) that flow into the City's General Fund, which can also be used for public benefits.

Next, with no evidence, the Coalition argues there is no financing gap. The City hired an independent financial analyst to determine whether the Project was feasible. The November 17, 2017 report from Keyser Marston Associates concluded that there was a major finance gap and the Project was infeasible without a public subsidy. This conclusion is backed by detailed financial modeling, market data, and development costs. Accordingly, the Coalition simply has no basis for its claim.

The Coalition tries to bootstrap in an argument that the public subsidy is improper because of homelessness issues in the City. That is a red herring. The two issues (homelessness compared to hotel development subsidy) are separate and distinct. This typical tactic of the Coalition to taint a project with unrelated, hot-button political issues, is deceitful. As proven above, the Project substantially increases revenues for the City, which can be applied to a multitude of public concerns. Thus, we suggest that any administrative or judicial

decisionmaker ponder the legitimacy of the Coalition's claims within the context of their tactical approach.

We close by noting that the Coalition did not object to the HDIA during the administrative process and it was approved long ago.

### **III. SALE OF CITY-OWNED PROPERTY**

The Coalition's objection to the sale of City property is not legally or factually grounded. The Coalition essentially raises two issues (i.e., surplus property process and market value) that effectively expose its unawareness of the procedure the City has completed for this sale. The Coalition also rambles through a hodgepodge of irrelevant statistics about home prices and rent increases, as a basis for its objection to the sale of property for a hotel development, which again illustrates the weakness of the Coalition's position. Council File No. 16-0073 (the contents of which we incorporate herein by reference) contains substantial evidence that rebuts each of the Coalition's claims.

Regarding surplus property, the Coalition incorrectly claims the City avoided the notice process required by Government Code Section 54220. On April 16, 2018, the City Administrative Officer provided a comprehensive report on the sale process to date. It contains Exhibit II: 54220 Notices Sent, which has numerous notices to local and state entities regarding the potential sale. No objections to the sale were received. The City complied. Generally, regarding the holistic surplus property sale process, including Request for Proposals ("RFP"), we reference back to the City Administrative Officer report that provides a history of the property from 1969 to 2018, explains the associated RFP process, and justifies the current sale. In short, there have been no other potential buyers or developers that would acquire the property despite the City's attempts to dispose of it. Thus, there is no merit in the Coalition's claim.

Regarding market value, the Coalition incorrectly claims that the sale price was based on a 2012 appraisal and is thereby not an accurate market value. That is flatly false. Valentine Appraisal & Associates prepared an appraisal in November 2016 that established the market value of the city-owned parcel as \$9.6 million. The purchase and sale agreement requires the Applicant to pay the appraised value for the city-owned land. Thus, there is no merit in the Coalition claim.

### **IV. GENERAL PLAN AMENDMENT AND ZONE AND HEIGHT DISTRICT CHANGE**

The Coalition asserts several unsupportable claims related to the City-initiated General Plan Amendment and Zone and Height District changes. We respond to each claim below.

First, the Coalition claims that the Project has significant land use impacts. The Draft EIR analyzed land use impacts in Section 4.7. It explained clearly that a project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. In addition, after detailed analysis of adopted plans, it concluded that the entitlements ensure consistency between applicable land use designations and zoning. Accordingly, the EIR correctly found that land use impacts are less than significant. Therefore,

the analysis in the EIR, and the City findings supporting certification of it, outweigh the Coalition's hollow claim.

Second, the Coalition incorrectly asserts that the zoning analysis in the EIR (regarding removal of the D limitation) only compared the Project to the un-adopted Central City Community Plan Update. That is simply not true. The EIR analyzed the Project compared to the adopted Central City Community Plan. See pages 4.7-37-40 of the Draft EIR. Then, in addition, and to provide the decisionmakers with context regarding how the Project relates to the City's pending DTLA 2040 plans, the Draft EIR provided a forward-looking consistency comparison of the Project to the pending Central City Community Plan Update. In other words, the Draft EIR provided two levels of analysis (i.e., adopted plans and pending plans) that robustly goes above and beyond the legal requirements of CEQA.

Third, the Coalition claims that the General Plan Amendment improperly usurps the Transfer of Floor Area Rights ("TFAR") Ordinance. As explained in the Draft EIR and Final EIR, the City has the legislative power to use General Plan Amendments, and it is not bound to only use the TFAR Ordinance, to change land use designations and zoning. In this case, the City exercised its authority to initiate and approve a General Plan Amendment. And contrary to the Coalition's related claim that it does not, the Project provides substantial public benefits, as discussed in the Development Agreement and HDIA sections above. Therefore, the Coalition's claims here fail legally and factually.

Fourth, the Coalition claims that the General Plan Amendment violates City Charter Section 555 and exceeds the City's legislative powers. The Coalition quotes Section 555, which states: "Amendment in Whole or in Part. The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity." As discussed below, the City properly exercised its legislative authority here.

The City Charter permits General Plan Amendments by geographic area. It does not establish size parameters for such areas. We also note that Section 11.5.6 of the Los Angeles Municipal Code ("LAMC") provides that the General Plan may be amended by geographic areas or by portions of elements or areas. A portion is considered an allotted part, a share, or a parcel. Here, the Coalition generically claims that the area involved does not constitute a geographic area. This circular reasoning runs contrary to numerous figures in the Draft EIR, and the many parcels identified on the tract map for the Project site, that show the geographic area subject to the General Plan Amendment.

The Project site also has significant economic and physical identity. The economic identity is significant as demonstrated in the November 17, 2017 report from Keyser Marston Associates and the April 23, 2018 report from the CLA. The physical identity is also significant. The Project site is not merely an abandoned remainder parcel with minimal physical presence. It is approximately 1.22-acres of land prominently positioned at the front door of the LACC and adjacent to the Metro Pico Station. The site is comprised of a series of parcels located at the epicenter of transit and convention activity in downtown. The site is also the southern gateway to the Los Angeles Sports and Entertainment District ("LASED") and encompasses the final parcels on the redevelopment superblocks that are redefining the character the South Park

district. Therefore, the General Plan Amendment complies with Charter Section 555 and the City's related findings (supported by evidence in the administrative record) are adequate.

Lastly, the Coalition's one-sentence claim that the Zone and Height District changes are improper, to the extent they are based on the General Plan Amendment, also fails for the reasons explained herein.

## **V. SIGN DISTRICT**

Without any supporting facts or evidence, the Coalition claims that the sign district is procedural and substantively improper under the LAMC and City Charter. We demonstrate below why the Coalition's claims regarding the sign district are meritless.

First, the sign district contains sufficient area. Section 13.11.B of the LAMC states that a sign district must contain no less than one block or three acres in area, whichever is the smaller. The sign district here contains approximately 4.35 acres, which satisfies the code requirement.

Second, the City Council is the legislative body that initiated, and ultimately acts upon the final sign district provisions. Section 12.32.S of the LAMC establishes that City Council is the legislative body entrusted with the power to approve sign districts. The Planning Department and City Planning Commission (as raised in the Coalition letter) are only recommending bodies. Therefore, the law and the inherent legislative power of the City Council permit amendments to the sign district provisions before a final City act to approve it. We note that Section 558 of the City Charter further confirms the legislative power of the City Council over the recommending capacity of the lower decision-making entities in the administrative process.

Moreover, the City made available to the public a draft of the sign district ordinance many months ago in the March 8, 2018 Planning Department Staff Report to the City Planning Commission. In addition, the City made available to the public the sign plans and lighting technical report for the signs within the sign district nearly a year ago in September 2017. Further back, the City identified the sign district as part of the Project on December 22, 2016 in its Notice of Preparation of an EIR and at the public scoping meeting. There have been numerous public hearings, statutory review periods, discussion of the sign district, and opportunities for unlimited testimony on the Project. However, not once – during nearly three years of administrative review – did the Coalition speak or otherwise raise any issue with the sign district. Hence, to now claim there was "not sufficient time for consideration" is false and in bad faith.

Third, the Coalition's claim that the sign district puts the public at risk is nonsense. The sign district is located in downtown Los Angeles adjacent to the LASED, LACC, LA Live and Staples Center, and the Metro Pico Station. These are bustling areas activated with dynamic large-scale signage that invigorates the character of the area. The attractive pedestrian and mixed-use experience in the area is defined in part by the existing signage and lighting levels. See Exhibit 2: Existing Signage and Lighting. In fact, the enhanced lighting from the Project and proposed sign district improve public safety. See Exhibit 3: LAPD Letter, which states that enhanced lighting and digital displays are positive elements that improve the Project site from a crime and safety perspective.



Fourth, the Coalition's claim that the sign district encroaches into R5 zoned areas misunderstands the law. Section 13.11.B of the LAMC provides that a sign district can be located on properties in the C or M Zones, and R5 Zone properties that are designated as a Regional Center, Regional Commercial, or within any redevelopment project area. The property within the sign district satisfies these zoning and land use criteria.

Fifth, the Coalition posits that a few ten-year-old newspaper articles about billboards in suburban parts of the City are somehow relevant to the proposed sign district located in the urban core of downtown's sports and entertainment district. This is a failed attempt to mischaracterize the sign district and pretend that the lighting conditions around the sign district are dark and somehow analogous to ambient conditions in suburban neighborhoods. Again, we reference Exhibit 2 above, which clearly illustrates that the sign district is similar to (and in several instances less intense than) the existing signage and lighting in the area. The stark factual misstep by the Coalition indicates that its letter is geared more to smear the sign district and the City than to raise a legitimate interest.

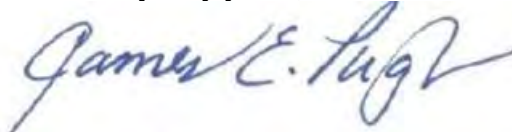
Similarly off base, and without any evidence, the Coalition claims that the City did not sufficiently study the impacts of the sign district. This claim is flatly wrong. As a fundamental legal point, Senate Bill 743 changed the requirements for analyzing environmental impacts related to aesthetics, for qualified projects, and determined that aesthetic impacts shall not be considered significant. In addition, the Planning Department's Zoning Information File No. 2452 provides that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the LA CEQA Thresholds Guide shall not be considered an impact for qualified projects. The Project is clearly qualified, as discussed in the Aesthetics section of the EIR. And, the EIR contained a robust quantitative and qualitative analysis of the sign district, including a detailed lighting technical report that analyzed luminance levels in the area and for the proposed signs. The analysis demonstrated that there were no significant impacts associated with the sign district. Similarly, where relevant, the EIR analyzed the potential impacts of the sign district across a broad spectrum of environmental issue areas (including cumulative impacts) and universally found it did not create significant impacts. Therefore, the Coalition's claim to the contrary is unsupportable.

## **VI. AIR QUALITY AND GREENHOUSE GAS EMISSIONS**

Without any support, the Coalition claims that the EIR underestimates air quality and greenhouse gas ("GHG") impacts. It appears that the Coalition simply copied-and-pasted a prior comment on the Draft EIR from hotel competitor American Life Inc. As explained in the Final EIR, the air quality and GHG impact analysis is supported by comprehensive and accurate quantitative modeling and evidence. The Coalition failed to raise any objections to the impact analysis before the City certified the EIR or approved the Project. Accordingly, the Coalition arguments lack legal merit and standing.

In closing, we reiterate that legislative decisionmakers, and potential judges, should frown upon the dishonest tactics used by the Coalition. The Applicant and the City have spent years complying with the rigorous requirements of the law. A faulty late-hit letter by the Coalition cannot and will not change that reality. Therefore, we look forward to a favorable and final City act to conclude the process.

Very truly yours,

A handwritten signature in blue ink, reading "James E. Pugh". The signature is fluid and cursive, with the first name "James" and last name "Pugh" clearly legible.

James E. Pugh

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Attachments

SMRH:486803787.3



## **EXHIBIT 1**

### **COALITION BACKGROUND INFORMATION**

# Preserve LA Website Homepage



## Big Tujunga Canyon Saved from Developers, a Huge Open Space Victory

In Fight Back by Jill Stewart / April 16, 2018

Big Tujunga Canyon land to be preserved as public parkland, after \$4.4 million conservancy purchase



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INVESTIGATIONS

DATA MAPS

FIGHT BACK

VIDEOS

NEWS

BAD EIRS



## Oppose Millennium Hollywood, the Earthquake-Prone Twin Skyscrapers Renamed "Hollywood Center"

In earthquakes, Fight Back, News by Jill Stewart / June 7, 2018

Get ready to fight the renamed Millennium Hollywood twin towers, which the badly tainted developers, Millennium Partners, are rebranding as "Hollywood Center," without their name on it because they're now infamous on ...



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PRESERVE LA

Tools For Protecting Your Neighborhood

Presented by Mitchell M. Tiao, Attorney-At-Law



## Slideshow: How to Fight a Bad Environmental Impact Report (EIR)

In Bad EIRs by Preserve LA / August 17, 2017



# Preserve LA Ties To Aids Healthcare Foundation

[INVESTIGATIONS](#)[DATA MAPS](#)[FIGHT BACK](#)[VIDEOS](#)[NEWS](#)[B/](#)

The plan is backed by Coalition to Preserve LA Executive Director Jill Stewart, AIDS Healthcare Foundation President Michael Weinstein, Holman Church UMC Senior Pastor Kelvin Sauls (a board director of AHF and a city commissioner on the Los Angeles Homeless Services Authority), Poverty Matters Executive Director Susie Shannon, Catholic Workers Associate Director Kaleb Havens, and many other civic leaders.

[TWEET](#)[SHARE](#)

A little over a year ago, Los Angeles voters rejected a sweeping [ballot measure](#) that would have put a freeze on many of the city's largest developments.

Critics of the anti-density initiative, called [Measure S](#), argued that it would [stifle new development](#) needed to alleviate a citywide housing shortage, and the measure garnered only a little over half of the yes votes needed for it to pass.

Yet the fiery campaign launched by its supporters brought many of the most outdated elements of the city's planning policies into the spotlight and helped accelerate the process by which the city [updates community plans](#) that guide development in specific neighborhoods.

The architect of that campaign was Jill Stewart, executive director of the Coalition to Preserve LA and [former managing editor](#) at *LA Weekly*. After the defeat of Measure S, the coalition continues to push for changes to LA's planning system. Stewart gave us an hour to talk about what she'd like to change about the way development happens in Los Angeles. Here are some excerpts from the conversation.

## AIDS HEALTHCARE FOUNDATION

6255 Sunset Blvd., 21st Fl.

Los Angeles, CA 90028 USA

323-860-5200

# Preserve LA Ties To Aids Healthcare Foundation

## Attorney Search

Liza Michalina Brereton - #261380

Current Status: Active


This attorney is active and may practice law in California.

See below for more details.

### Profile Information


The following information is from the official records of The State Bar of California.


<b>Bar Number:</b>	261380		
<b>Address:</b>	AIDS Healthcare Foundation 6255 W Sunset Blvd Fl 21 Los Angeles, CA 90028 <a href="#">Map it</a>		<b>Phone Number:</b> <a href="tel:(323)860-5214">(323) 860-5214</a>
			<b>Fax Number:</b> <a href="tel:(323)467-8450">(323) 467-8450</a>
	<b>Email:</b> <a href="mailto:liza.brereton@aidshhealth.org">liza.brereton@aidshhealth.org</a>		
<b>County:</b>	Los Angeles	<b>Undergraduate School:</b>	Kalamazoo Coll; Kalamazoo MI
<b>District:</b>	District 2		





**Liza Brereton** • 2nd  
Counsel, AIDS Healthcare Foundation  
Greater Los Angeles Area

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 AIDS Healthcare Foundation

 University of California, Los Angeles - School of Law

 See contact info

 500+ connections

### Experience



**Counsel**  
AIDS Healthcare Foundation  
Dec 2014 – Present • 3 yrs 7 mos  
Hollywood, California

Serving 38 countries and over 800,000 patients, AHF provides cutting edge medicine and advocacy regardless of ability to pay. As Counsel for AHF, I litigate cases in state and federal court and oversee litigation. I also advise our nonprofit affordable housing projects. I am involved in global work in overseeing the legal issues in AHF's Asia Bureau (which currently covers 9 countries), including registering nonprofit entities in Asia. I also draft MOUs and contracts globally and domestically, and provide corporate, ballot initiative, grant, IP, advocacy, and employment advice and counsel.



# Preserve LA Ties To Aids Healthcare Foundation

## Coalition to Preserve LA to Launch Ballot Measure to Transform Parker Center into Homeless Housing; Rename it Tom Bradley Center

Press Conference Thursday, May 24, 10:00 am Parker Center

*City ballot initiative to turn Parker Center into the Tom Bradley Center: Save this historic building from demolition for a fitting new use to house the homeless*

May 23, 2018 07:48 PM Eastern Daylight Time

LOS ANGELES--(BUSINESS WIRE)--Thurs, May 24, 10:00 am, 150 N. Los Angeles Street: Coalition to Preserve LA, with AIDS Healthcare Foundation (AHF) and architects, homeless advocates, preservationists and community leaders, will announce an initiative to preserve and reuse Parker Center, renamed as Tom Bradley Center.

For five years, Parker Center has stood empty. City Council plans to demolish it and erect a \$483 million luxury office skyscraper for city workers. Failing to convert Parker Center into homeless housing is unacceptable in our growing humanitarian crisis.

 [Tweet this](#)

Tom Bradley was L.A.'s first African-American mayor, serving five terms. This seminal leader of L.A. boldly championed the underserved and faced down personal and societal discrimination.

L.A. ranks second-to-last among major metro areas in providing homeless shelter. For five years, Parker Center has stood empty. The City Council plans to demolish it and erect a \$483 million luxury office skyscraper for city workers. Failing to convert Parker Center into homeless housing is unacceptable amidst our growing humanitarian crisis.

**What:** Initiative to Save and Rename Parker Center

**When:** Thursday, May 24, 2018

**Time:** 10:00 am

**Where:** Parker Center, 150 N. Los Angeles Street Los Angeles, 90014

**Who:** Jill Stewart, Coalition to Preserve LA Executive Director  
Michael Weinstein, AHF President  
Rev. Kelvin Sauls, Senior Pastor, Holman United Methodist Church  
Community leaders and homeless advocates

### Contacts

Coalition to Preserve LA  
Ileana Wachtel, 310-702-4240,   
[wachtelileana@gmail.com](mailto:wachtelileana@gmail.com)

# Preserve LA Ties To Aids Healthcare Foundation

## March Election: What to Know About Measure S

By [Christine Schmidt](#)

Published at 10:25 AM PST on Feb 3, 2017

Neighborhood activists and elected officials have lined up on both sides of the debate for a controversial -- and sometimes confusing -- ballot measure.

We break down Measure S, on the ballot in the [March 7 Los Angeles election](#), for you here.

**What It Is:** One of four city-wide measures up for vote on the ballot in the next election. Also known as the Neighborhood Integrity Initiative, Measure S would do the following:

- Stop any new high-density construction projects (such as apartments) for the next two years
- Prohibit "project-specific" changes that would create loopholes in the city of Los Angeles's General Plan for urban development
- Require the city to complete studies of environmental impact of new projects rather than the developers behind the project.

Scroll down to read the full text.

**What It Means:** Basically, advocates of Measure S want to stop high-rises from being built in LA's neighborhoods, but opponents argue that real estate development is key to the prosperity of the city and of its overcrowded residents.



# Preserve LA Ties To Aids Healthcare Foundation

The city of LA maintains plans for individual communities governing height and density restrictions for most real estate projects. According to [CurbedLA](#), 29 of 35 community plans are at least 15 years old — meaning out of date in the real estate world. Most developers have to seek special approval for their project through the city. This measure would put the brakes on high-profile projects, which typically are signs of a thriving economy and can provide jobs and tax revenue as well as more spaces for people to live in the second largest city in the nation. Approximately one-third of construction in Los Angeles would be affected.

**When It's Up for a Vote:** March 7, 2017 — the same election in which the mayor, other city officials, and school district officials are on the ballot.

**Who's Behind It:** Measure S supporters have largely organized behind the Yes on S LA banners you may have seen on billboards around LA. The group's efforts, led by former LA Weekly editor Jill Stewart, are paid for by the Coalition to Preserve LA which is sponsored by the AIDS Healthcare Foundation. Foundation president Michael Weinstein has been involved in political advocacy campaigns before, such as the fight to require condom usage on adult film sets.

• **Updates:** [Download the NBCLA App](#)

Weinstein and the AHF began organizing the Yes on S group in February 2016; the following month, a developer won City Council approval to build two residential high-rises next door to the foundation's headquarters, saying that the project was too tall and dense for its location. Weinstein told the [LA Times](#) that they "intend to to exhaust every legal avenue, including filing suit, to stop the Palladium towers." Other members of the Yes on S LA coalition include the Los Angeles Tenants Union, former LA mayor Richard Riordan, environmental advocates, and numerous homeowner associations and neighborhood councils.

**What They Say:** The language of the measure specifically addresses concerns about developers making political donations to elected officials to ensure city approval of their projects. Measure S supporters say these developments, intended to accommodate Los Angeles's growing population, will increase local traffic, ruin the character of neighborhoods, and contribute to the eviction of residents such as senior citizens and low-income Angelenos. They've been waging an aggressive public relations campaign, posting videos on social media and hosting events almost every week highlighting people affected by the real estate development.

"City leaders are approving luxury housing projects that my community can't even afford," said South LA resident Damien Goodman in a [Yes on S LA YouTube video](#).

**Who Opposes It:** The opposing group organized in response to the measure is paid for by the Coalition to Protect LA Neighborhoods, which says it gets the majority of its funding from CH Palladium LLC, the developer behind the project that incited Weinstein's legal battle. But it's also garnered support from a number of local officials such as Mayor Eric Garcetti, chambers of commerce, nonprofits like the United Way of LA, philanthropists like Eli Broad, urban planning professors, homeless advocates, both the Los Angeles County Democratic and Republican parties, and homeowners associations and neighborhood councils as well.

**What They Say:** Opponents fear that this two-year moratorium would significantly hurt the economy of the second largest city in the nation, contributing to an already severe housing shortage and blocking thousands of jobs and millions of dollars in taxes for education and parks. Los Angeles pays for public education via property taxes, so the more dollars there are in an area the more funding there are for the schools.

"If Measure S passes, if you think the housing crisis is bad now, it's going to get worse," Garcetti [said](#) at an event opposing Measure S. "Rents will rise even more quickly than they are today. Our strategy to move people from the streets into housing will be stuck."

According to an economic [report](#) on the Vote No on Measure S website, Measure S could cost over 12,000 jobs each year and \$27 million in property tax revenue over the two years of the moratorium.

"Placing a ban on construction of residential development will result in higher rents throughout the city," [said](#) low-income housing developer Robin Hughes.

# Preserve LA Ties To Aids Healthcare Foundation

## L.A. Weekly's Jill Stewart Named Campaign Director by 'Coalition to Preserve L.A.' for 'Neighborhood Integrity Initiative' Development Ballot Measure

In Advocacy, News by AHF / January 7, 2016

*Respected longtime award-winning journalist, editor and political analyst will step down as Managing Editor of L.A. Weekly after nearly a decade at the paper.*

LOS ANGELES (January 6, 2016) **Jill Stewart**, Managing Editor of the *L.A. Weekly* since 2012 and an award-winning print, digital and broadcast journalist with an extensive background in urban affairs and government reporting, political commentary and analysis, print and digital editing and social media, has been named Campaign Director by the **Coalition to Preserve L.A. (CPLA)** for the **"Neighborhood Integrity Initiative."** The Initiative is an upstart City of Los Angeles ballot measure first introduced in mid-November of last year that is intended to curb abusive land use practices and favoritism shown to developers by the City of Los Angeles Planning Department and City Hall. The Initiative will help preserve the character of Los Angeles neighborhoods by stopping unlawful amendments by the City Planning Department and by requiring developers to follow the City's General Plan and other applicable laws in an increasingly overdeveloped Los Angeles.

In her new role as Campaign Director, Stewart will oversee and manage the Coalition to Preserve L.A., a grassroots group of city residents, community and neighborhood groups and L.A. voters concerned about runaway 'mega-development' in Los Angeles. She will also manage the strategic longer term planning as well as day-to-day operations of the Neighborhood Integrity Initiative ballot measure campaign, which, when qualified, is expected to appear on the November 2016 Los Angeles citywide presidential election ballot.

The respected longtime award-winning journalist, editor and political analyst will step down as Managing Editor of *L.A. Weekly* in early February after nearly a decade at the paper. Since joining *L.A. Weekly* in the fall of 2006, Jill has overseen more than 60 staff and freelance writers and editors as well as a sizable freelance budget. In 2012, she was tapped to become managing editor.

During the past two decades, Stewart (photo) also appeared on hundreds of hours of live TV and radio, both as the broadcast host and as the guest, generally focused on analyzing political races, ballot measures and government policies and controversies. She was a political analyst for KNX News Radio's coverage of the 2014 California gubernatorial race; for FOX-11's coverage of the 2010 California gubernatorial race, and she contracted with KCAL-9 to provide live TV analysis throughout its coverage of the 2005 Los Angeles mayoral race. She has analyzed California issues for a national TV audience on MSNBC, FOX, CSN/C and CNN, and has appeared extensively on BBC, KPCC, KCRW, KFI and KABC radio. From 1996 to 2002, Jill wrote an award-winning column for *New Times-Los Angeles* that analyzed the civic institutions and power players who shaped California.

"We are delighted to have a powerhouse like Jill Stewart join the Coalition to Preserve L.A. as Campaign Director to manage and direct what many supporters genuinely see as a quality-of-life ballot initiative here in the City of Los Angeles," said **Michael Weinstein**, a Coalition member, one of the ballot measure's five citizen proponents and the President of AHF. "As a longtime Angeleno and someone who has been covering, reporting on or assigning and editing stories on many of the players and issues involved here for more than a decade, Stewart brings tremendous expertise and institutional knowledge as well as keen political acumen to the table. We could not be happier to welcome Jill to the Coalition to Preserve L.A."

Reflecting on her transition from the *Weekly* to the Coalition to Preserve L.A., Stewart said, "I'm leaving *L.A. Weekly*, a Los Angeles institution filled with tremendous talent and good friends, only after a lot of thought, over several months, about the nature of a meaningful life. I am incredibly proud to be joining a group that is fighting for community and a sense of place, without which this vast and wonderful city would be unlivable."

In a poll released December 10<sup>th</sup> by the Coalition to Preserve L.A., 72% of Los Angeles residents surveyed expressed support for the ballot measure requiring developers and elected officials to adhere to the city's General Plan—which provides an overview of land use and traffic policies—to determine city approval of proposed real estate development projects. Based on an online survey conducted December 3-7<sup>th</sup>, the final poll of 557 registered City of Los Angeles voters found that 2 out of 3 City residents support the Neighborhood Integrity Initiative, a ballot measure sponsored by the Coalition to Preserve L.A. that would:

- Halt individual parcel-by-parcel or 'spot zone' amendments and/or building exemptions;
- Enact a temporary, two-year moratorium on building or demolition permits for projects that do not adhere to existing City planning regulations and/or for which the City granted a General Plan amendment, or zone or height change;
- Take the preparation of a project's required Environmental Impact Report (EIR) out of the hands of developers; and
- Limit a developer's ability to reduce required parking for building developments.

## **EXHIBIT 2**

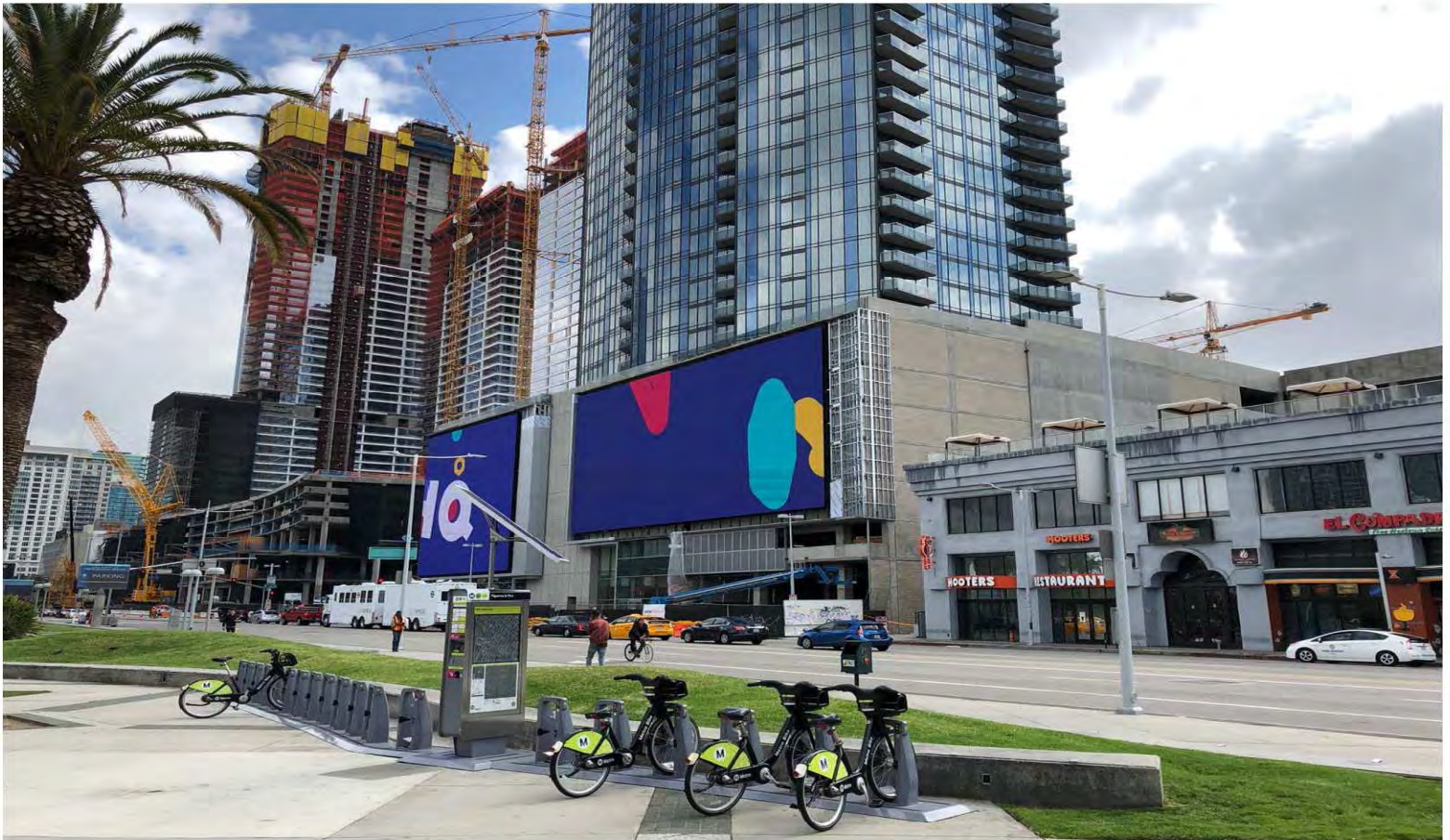
### **EXISTING SIGNAGE AND LIGHTING**



## Large-Scale Animated Digital Displays

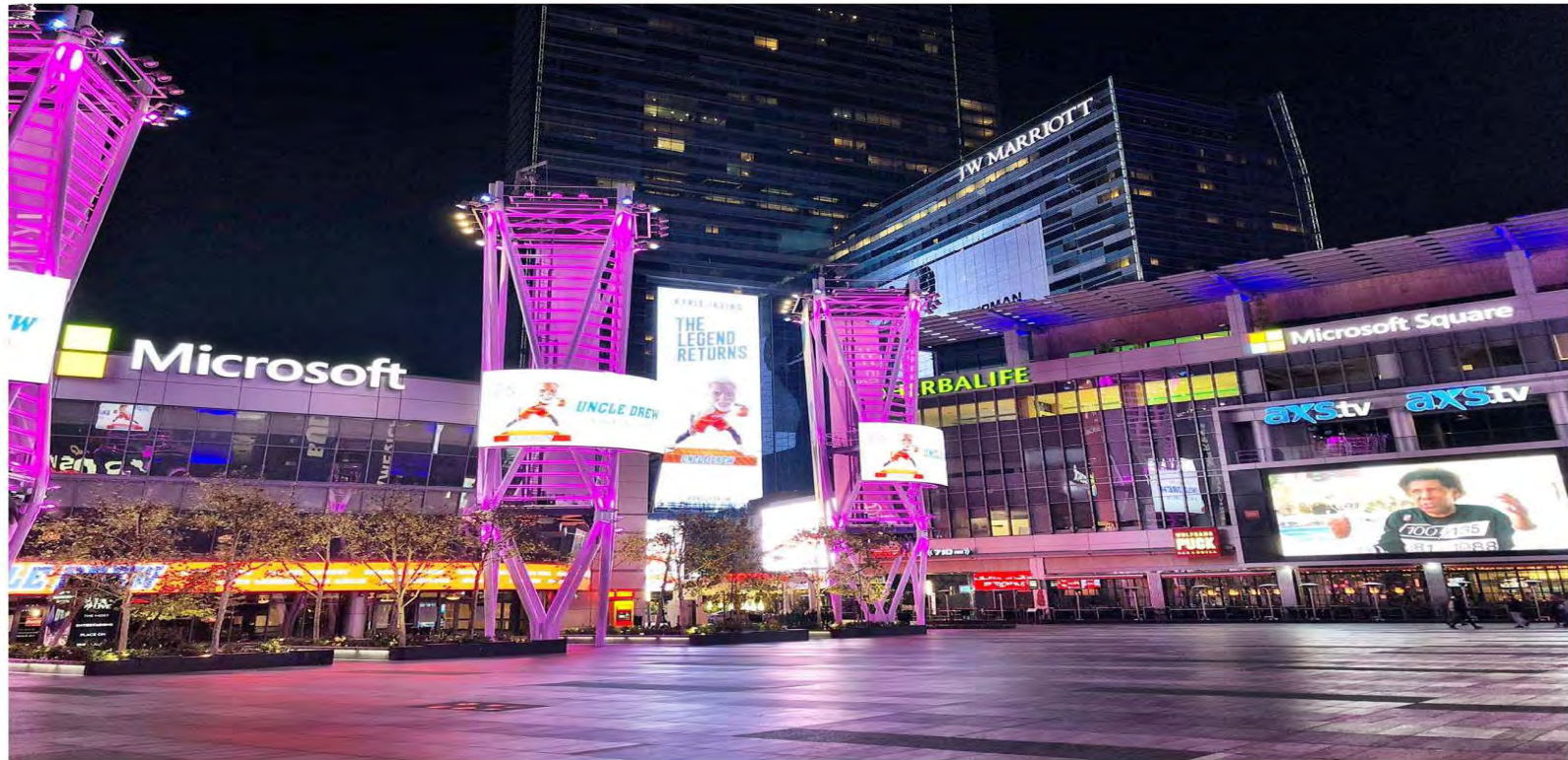


## Signage Adjacent to Project Site

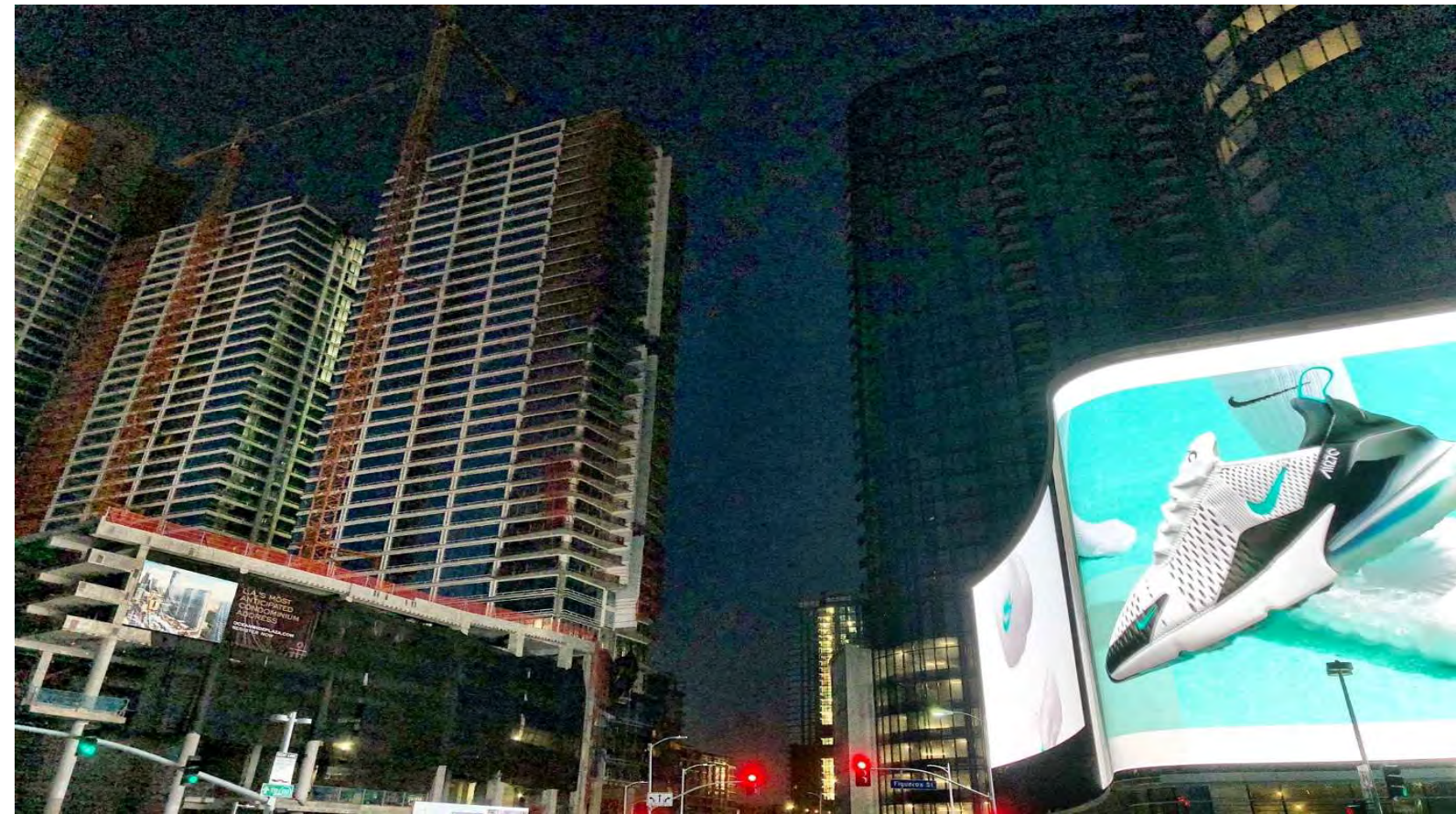




## LASED Signage



## Digital Displays Adjacent Residential





**EXHIBIT 3**

**LAPD LETTER**



# LOS ANGELES POLICE DEPARTMENT

**CHARLIE BECK**  
Chief of Police



**ERIC GARCETTI**  
Mayor

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Los Angeles, CA 90030  
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April 5, 2018

Councilmember Jose Huizar, Chair  
Members of the Planning and Land Use Management Committee  
200 North Spring Street, Room 340  
Los Angeles, CA 90012

Re: Conditions Around the Fig+Pico Conference Center Hotels Project

Dear Honorable Chair and PLUM Committee Members,

On February 22, 2018, the Los Angeles Police Department (LAPD) presented the South Park Business Improvement District ("SPBID") Board of Directors with crime statistics and neighborhood trends in South Park. We also discussed how development activities around the Los Angeles Convention Center and LA Live will affect future conditions in South Park.

From that meeting, and subsequent correspondence with the SPBID, we understand that the Fig+Pico Conference Center Hotels Project will redevelop certain parcels located on Figueroa Street, Pico Boulevard, and adjacent to the Metro Pico Station on Flower Street. We also understand that this project will improve the streetscape, enhance lighting along the sidewalks, and may include a digital display facing the Metro platform. These are positive elements that enhance the site from a crime and safety prospective; therefore, the Los Angeles Police Department does not oppose this project.

Should you have any questions, please feel free to contact me at (213) 833-3707.

Very truly yours,

**CHARLIE BECK**  
Chief of Police

A handwritten signature in black ink, appearing to read "MARC REINA", is written over a horizontal line.

MARC REINA, Captain  
Commanding Officer  
Central Area