

AUG 18 2008

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Ref: 00000-5004

August 7, 2008

**VIA FACSIMILE AND FIRST CLASS MAIL**Karen E. Kalfayan  
Office of the City Clerk  
Council and Public Services  
Room 395, City Hall  
Los Angeles, CA 90012

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**Re: Opposition to Vacating the Alley Northwesterly of Grand Between Adams  
Boulevard and 23rd Street; VAC E1400822**

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Dear Ms. Kalfayan:

On behalf of our client Palmer/Flower Street Properties ("Palmer"), please consider this letter as a formal objection to the proposed vacation of the alley northwesterly of Grand between Adams Boulevard and 23rd Street.

The City of Los Angeles' ("City") requisite findings that it made in order to vacate the alley, namely that the alley (1) is unnecessary for present or prospective public use, (2) is not needed for vehicular circulation or access and (3) it is not needed for non-motorized transportation purposes, are not supported by the facts in the record.

Specifically, the alley is necessary for present and prospective public use. The alley is critical to providing adequate emergency access to our client's project, the Palmer Lorenzo project ("Project") located at 2400 S. Flower Street. The Project is currently going through its CEQA environmental review process. The City published a Notice of Preparation and Public Scoping Meeting for an Environmental Impact Report related to the Project dated June 11, 2008. The vacation of the alley will delay or inhibit critical emergency access to both the fire and police departments. In emergency situations, the additional access and the time saved that the alley will provide may mean the difference between successfully providing emergency services or not. In the alternative, requiring Palmer to dedicate an emergency corridor through the Project may make the completion of the Project infeasible.

Similarly, the alley is needed for vehicular circulation and access. Again, the alley is critically needed for emergency vehicle access. Also, the future residents and/or customers of the mixed-use component of the Project may require the use of the alley for ingress and egress to the Project.

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The Project enjoys street frontage on Flower Street, 23rd Street and Adams Boulevard. However, residents and customers of the mixed-used component of the Project will not be able to access the Project via motorized vehicles on Flower Street because of the construction of the new Exposition Line station. Consequently, vehicle access to the Project would be restricted to 23rd Street and the small portion of the Project that fronts Adams Boulevard. Access to the Project via the alley is an important detail to the successful completion of the Project.

Finally, we request that any action that was taken at the August 6, 2008 City Council hearing be reconsidered at a future City Council hearing. As an applicant of a major project abutting the subject alley, Palmer was shocked to learn that the Council held a hearing to consider the vacation of the alley. Palmer did not receive formal notice of the hearing from the City. Palmer acquired title to the Project site on July 18, 2006. Palmer filed its application for a zone change with the City on December 11, 2006. Accordingly, Palmer expected to receive formal notices from the City related to any and all hearings related to the proposed alley vacation.

On behalf of Palmer, I respectfully request that you include both our client and my office on any future notice lists related to alley vacation issue.

Thank you for your time and consideration.

Very truly yours,



NOEL TAPIA for  
Jeffer, Mangels, Butler & Marmaro LLP

NXT:lh

cc: Council President Eric Garcetti  
Councilwoman Jan Perry  
Edmond Yew