

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062

ssannadan@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

KEVIN T. CARMICHAEL
CHRISTINA M. CARO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
DARIEN K. KEY
RACHAEL E. KOSS
AIDAN P. MARSHALL
TARA C. RENGIFO
MICHAEL R. SEVILLE

Of Counsel

MARC D. JOSEPH
DANIEL L. CARDOZO.

June 16, 2022

Via Email and U.S. Mail

Vince Bertoni, Director of Planning
City Planning Department
City of Los Angeles
200 N. Spring St., Suite 525
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org

Holly L. Wolcott, City Clerk
Office of the City Clerk
200 N. Spring Street
City Hall - Room 360
Los Angeles, CA 90012
Email: CityClerk@lacity.org

Via Email Only

James Harris, Project Planner
Email: james.harris@lacity.org

**Re: Request for Mailed Notice of Actions and Hearings – 1000
Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-
VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239)**

Dear Mr. Bertoni, Ms. Wolcott, and Mr. Harris:

We are writing on behalf of **Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”)** to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the 1000 Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239) (“Project”), proposed by 39 South, LLC, as well as a copy of the environmental review document when it is made available for public review.

The Project includes demolition of two existing commercial buildings totaling 10,993 square feet (sq ft) and a surface parking lot, and the development of a 10-story commercial building on a 34,152 sq ft (0.78-acre) site located at 1000 and 1006 Seward Street; 1003, 1007, and 1013 Hudson Avenue; and 6565 Romaine Street in the Hollywood Community Plan Area of the City of Los Angeles, California. The Project would include the development of new office, restaurant, and retail uses totaling 150,600 sq ft.

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We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152, 21167(f), and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send the above requested items by email and U.S. Mail to our South San Francisco Office as follows:

U.S. Mail

Sheila Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

Please call me at (650) 589-1660 if you have any questions. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

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June 16, 2022

Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

VIA EMAIL AND U.S. MAIL

James Harris, Project Planner
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: james.harris@lacity.org

VIA EMAIL ONLY

Beatrice Pacheco, Chief Clerk Lourdes Sanchez, Sr Administrative Clerk
Email: beatrice.pacheco@lacity.org Email: lourdes.sanchez@lacity.org

Re: Request for Immediate Access to Public Records - 1000 Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239)

Dear Mr. Harris, Ms. Pacheco, and Ms. Sanchez:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to request ***immediate access*** to any and all public records referring or related to the 1000 Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239) (“Project”), proposed by 39 South, LLC. This request includes, but is not limited to, any and all materials, applications, correspondence, resolutions, memos, notes, analyses, electronic mail messages, files, maps, charts, and/or any other documents related to the Project. This request ***does not include*** the Draft Environmental Impact Report (“DEIR”) or documents referenced or relied upon in the DEIR, **which we have requested in a separate letter pursuant to the California Environmental Quality Act.**

The Project includes demolition of two existing commercial buildings totaling 10,993 square feet (sq ft) and a surface parking lot, and the development of a 10-story commercial building on a 34,152 sq ft (0.78-acre) site located at 1000 and 1006 Seward Street; 1003, 1007, and 1013 Hudson Avenue; and 6565 Romaine Street in the Hollywood Community Plan Area of the City of Los Angeles, California. The

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Project would include the development of new office, restaurant, and retail uses totaling 150,600 sq ft.

This request is made pursuant to the California Public Records Act, Government Code §§ 6250, *et seq.* This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request ***immediate access*** to review the above documents pursuant to section 6253(a) of the Public Records Act, which requires public records to be “open to inspection at all times during the office hours of the state or local agency” and provides that “every person has a right to inspect any public record.” Gov. Code § 6253(a). Therefore, the 10-day response period applicable to a “request for a copy of records” under Section 6253(c) does not apply to this request.

I will be contacting you to arrange for the review/duplication/transmission of the requested records soon. In the interim, if you have any questions or concerns regarding this request, my contact information is:

U.S. Mail

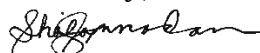
Sheila Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

CC: Vince Bertoni, Director of Planning
Email: vince.bertoni@lacity.org

SMS:acp

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Via Email and U.S. Mail

Vince Bertoni, Director of Planning
City Planning Department
City of Los Angeles
200 N. Spring St., Suite 525
Los Angeles, CA 90012
Email: vince.bertoni@lacity.org

Holly L. Wolcott, City Clerk
Office of the City Clerk
200 N. Spring Street
City Hall - Room 360
Los Angeles, CA 90012
Email: CityClerk@lacity.org

Via Email Only

James Harris, Project Planner
Email: james.harris@lacity.org

Re: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report – 1000 Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239)

Dear Mr. Bertoni, Ms. Wolcott, and Mr. Harris:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Draft Environmental Impact Report (“DEIR”) prepared for the 1000 Seward Project (Case Nos. ENV-2020-1239-EIR, CPC-2020-1237-VZC-HD-GPA-MCUP-SPR; SCH No. 2020120239) (“Project”), proposed by 39 South, LLC. *This request excludes a copy of the DEIR and its appendices. This request also excludes any documents that are currently available on the Project’s webpage on the City of Los Angeles website, as of today’s date.*¹

¹ Accessed <https://planning.lacity.org/development-services/eir/1000-seward-project-0> on June 15, 2022.

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The Project includes demolition of two existing commercial buildings totaling 10,993 square feet (sq ft) and a surface parking lot, and the development of a 10-story commercial building on a 34,152 sq ft (0.78-acre) site located at 1000 and 1006 Seward Street; 1003, 1007, and 1013 Hudson Avenue; and 6565 Romaine Street in the Hollywood Community Plan Area of the City of Los Angeles, California. The Project would include the development of new office, restaurant, and retail uses totaling 150,600 sq ft.

Our request for ***immediate access*** to all documents referenced in the DEIR is made pursuant to the California Environmental Quality Act (“CEQA”), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.²

The Notice of Availability for the DEIR states that the documents referenced in the DEIR are available for public review, by appointment at City Planning offices located at 221 N Figueroa Street, Suite 1350, Los Angeles, CA 90012. I will be contacting you to arrange for the review/duplication/transmission of the requested records soon. In the interim, if you have any questions or concerns regarding this request, my contact information is:

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Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
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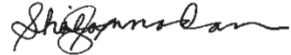
ssannadan@adamsbroadwell.com

² See Public Resources Code § 21092(b)(1) (stating that “all documents referenced in the draft environmental impact report” shall be made “available for review”); 14 Cal. Code Reg. § 15087(c)(5) (stating that all documents incorporated by reference in the EIR . . . shall be readily accessible to the public”); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 (“[W]hatever is required to be considered in an EIR must be in that formal report. . .”), internal citations omitted.

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Page 3

Please call me at (650) 589-1660 if you have any questions. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

CC: Beatrice Pacheco, Chief Clerk
Email: beatrice.pacheco@lacity.org

Lourdes Sanchez, Sr Administrative Clerk
Email: lourdes.sanchez@lacity.org

SMS:acp