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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

18 JDR CRESCENT, LLC; a limited liability
company; IGI CRESCENT, LLC, a limited
19 liability company,

20 **Petitioners,**

21 **v.**

22 CITY OF LOS ANGELES, a municipal
corporation; CITY COUNCIL OF THE CITY
OF LOS ANGELES, the governing body of
23 the City of Los Angeles; and DOES 1 through
25, inclusive,

24 **Respondents.**

26 AG-SCH 8150 SUNSET BOULEVARD
OWNER, L.P., a limited partnership; and
27 ROES 1 through 25, inclusive,

28 **Real Parties in Interest.**

EXEMPT FROM FILING FEES
GOV'T CODE § 6103

Case No. BS166525

Related to: Case Nos. BS166487,
BS166525, BS166585

**JOINT OPPOSITION BRIEF TO
PETITIONS FOR WRIT OF MANDATE**

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JDR		
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1 **Other Authorities**

2 1 Kostka & Zischke, *Practice Under the Cal. Environmental Quality Act*
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4 2 Longtin’s California Land Use § 12.34[1] (2013 Permanent Update).....30
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1 INTRODUCTION

2 Respondents City of Los Angeles and Los Angeles City Council (collectively, “the City”)
3 and Real Party in Interest AG-SCH 8150 Sunset Owner LLP (“Real Party”)¹ hereby oppose the
4 opening briefs filed by the four sets of Petitioners in this case.² Petitioners challenge the City’s
5 approval of the 8150 Sunset Boulevard Project (“Project”), a sustainably designed, mixed-use
6 development comprised of 229 residential dwelling units (including 26 units set aside for Very
7 Low Income households and 12 units set aside for Workforce Income households)³, 65,000 square
8 feet of commercial uses, and other facilities. The Project will replace an outdated commercial
9 strip mall and large surface parking lot with a high-quality, iconic and architecturally distinctive
10 design at the western gateway of Hollywood. Governor Brown certified the Project as an
11 Environmental Leadership Development Project (“ELDP”), which means it will result in a
12 minimum investment of \$100 million dollars in California, create high-wage, highly-skilled jobs,
13 meet stringent sustainability and transportation efficiency standards, and will not result in net
14 additional emission of greenhouse gases (“GHG”).

15 Petitioners assert virtually every conceivable challenge (as well as some that are virtually
16 inconceivable) in the arsenal of opponents of development projects, including claims under the
17 California Environmental Quality Act (“CEQA”), the State Planning and Zoning Law, the
18 Subdivision Map Act, the Streets and Highway Code, the Alquist-Priolo Earthquake Fault Zone
19 Act, the Municipal Code, and constitutional due process, and have even dredged up an old

20
21
22 ¹ Petitioner Suzanne Manners also improperly named Townscape Partners as a real party, and to
the extent that Townscape is required to respond, it joins in this Joint Opposition Brief.

23 ² Petitioner Fix the City, Inc. (“FTC”), Petitioners JDR Crescent, LLC, *et al.* (collectively,
24 “JDR”), Petitioner Los Angeles Conservancy (“LAC”), and Petitioners Susanne Manners,
25 (“Manners”) (collectively, “Petitioners”). In the interest of efficiency and consistent with the
court-approved stipulations governing brief length, Respondents and Real Party file this single
consolidated brief in opposition to all four petitions. The table of contents of this brief includes a
chart describing where each of the Petitioners’ major arguments are addressed herein.

26 ³ “Very Low Income” is a standard generally set by the federal government, but is also defined as
27 “50 percent of area median income, adjusted for family size.” (Gov. Code, § 50105.) “Workforce
Income” is defined as “the annual income of a household that does not exceed 150% of the area
28 medium income” (Los Angeles Municipal Code (“LAMC”) § 12.22 A.29(a).)