

H U E N E R G A R D T



S C U L P T O R

CASE FILE DIR 2001-4026-5PR

Oct. 4, 2001

I represent a group of concerned citizens, regarding the demolition of the Schubert Theatre, 2020 Avenue of the Stars, Century City.

We are requesting a public hearing on the impact this destruction would have on the cultural future of our city.

Sincerely,  
Bob Huenergardt



November 2, 2001

Mr. Daniel J. Niemann  
Senior Vice President  
Trammell Crow Company  
2049 Century Park East, Suite 2650  
Los Angeles, CA 90067

Dear Mr. Niemann:

Thank you for the presentation you made to us on October 25, 2001 regarding the proposed new project at the ABC Entertainment Complex. We must admit that we were disappointed that you did not consult with us earlier in your planning process and waited until more than two months after your submission of plans to the City of Los Angeles before meeting with your closest and most impacted neighbor in Century City. Nevertheless, we want to work with you now to ensure that your proposed project and our hotels can function well together.

We are still reviewing the information you presented to us and evaluating the impact of your proposed design on our properties, the St. Regis Hotel and the Century Plaza Hotel. We want to express our initial concerns with the plans you have shown us. Although we are favorably impressed with the overall quality of the design, we have many concerns about the impact of the design, construction and operation of the project on our two hotel properties immediately across Avenue of the Stars.

Both hotels, but especially the Century Plaza Hotel, will be greatly impacted during the extensive demolition and lengthy construction period for this massive project. We are already suffering through the hauling, grading and construction of the JMB Constellation Place project behind the hotel and are well aware of the great potential impact of your construction. Your estimated 27 month construction period including demolition and hauling will certainly cause traffic circulation, pedestrian access, noise and air quality impacts on the hotel and its guests. Once built, the project itself will pose potential traffic, pedestrian circulation, shadow, noise, wind and view impacts to the hotel and its guests.

PIVOTAL  
G R O U P

The Esplanade • Suite 960  
2415 East Camelback Road  
Phoenix, Arizona 85016  
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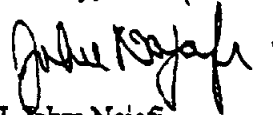
Mr. Daniel J. Niemann  
November 2, 2001  
Page 2

We are especially concerned about the project's elimination of the existing pedestrian plaza under Avenue of the Stars which currently connects the Century Plaza Hotel and the project site. Your current design does not appear to adequately address overall pedestrian circulation between the two properties. The placement of your retail amenities does not enhance the pedestrian linkage of your site with the hotel nor the rest of Century City. The existing wide pedestrian walkway under Avenue of the Stars has been in place for several decades and provides hotel guests along with all pedestrians in the area with convenient access to amenities on both properties, including restaurants, theaters, stores and banks. Any change to the design of the pedestrian access will significantly impact both the hotel and the surrounding area.

Due to the size of the project and the potential for impact to our property, we still need a great deal of information about these impacts before we can formulate our position on the project.

We would like to schedule a time next week on Tuesday, November 6, anytime between 2 and 6 p.m. to view the project model as you offered. After, we plan to set a schedule of meetings with you and your architect to resolve any potential issues. I look forward to hearing from you.

Sincerely,



J. Jahm Najafi  
COO

cc: Councilmember Jack Weiss  
Planning Director Con Howe

VIA FAX AND MAIL

# TRACT NO. 7260 ASSOCIATION, INC.

2065 Kerwood Avenue, Los Angeles, CA 90025-6006 (310) 277-6505

President  
Diane Wick

Vice-President  
Mike Eveloff

Secretary  
Richard S Harmetz

Treasurer  
Mark Robbins

Board of Directors  
Clyde Augustson  
Marie Epstein  
Michael Eveloff  
Richard S Harmetz  
Kurt Herrmann  
Irving Hirschfield  
Patty Hoffen  
Shirley Kiley  
Mark Robbins  
Richard Smith  
Iue Sokol  
Edward Wahl  
C. Z. Wick  
Diane Witz

December 1, 2001

Con Howe, Director of City Planning  
Department of Planning  
City of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012-2601

Re Case No. DIR-20001-4026-SPR

Dear Mr. Howe:

We were bewildered by the fact that the Planning Department has recommended that the city issue a negative declaration for the Trammell Crow property at 2000 Avenue of the Stars located between Constellation Boulevard and Olympic Boulevard, West Los Angeles.

The Tract No. 7260 Association believes that if the city does not modify Trammell Crow's development plans at the ABC Entertainment Center, the existence of the new building will cause traffic havoc on Santa Monica, Olympic, and Pico Boulevards. Already, some of the intersections on those streets are at gridlock during the rush hour, and we fear that the change in the use of the property will have dire effects on rush hour traffic.

We believe that most of the traffic generated by the current property occurs during off-peak hours because the major use of the property is for theatres. As you are aware, most people who attend movies or theatrical productions drive to theatres during off-peak hours.

However, the conversion of the property to mostly office use from mostly theatre use means that much of the traffic that the new building will create will occur during rush hours.

Consequently, we request that the city require an EIR for the property in order to determine whether our beliefs about the traffic are correct.

We would also like to meet with you about this matter as soon as possible..

Sincerely,



Richard S Harmetz, Secretary  
Tract No. 7260 Association, Inc.

CITY OF LOS ANGELES

DEC 05 2001

EXECUTIVE OFFICE  
FROM 1640

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DEC 12 2001

CITY PLANNING  
DIVISION OF LAND

Lee, Jennifer (LA)

---

From: Hplafkin@Planning.Lacity.Org  
Sent: Saturday, December 01, 2001 8:30 PM  
To: comment@planning.ci.la.ca.us  
Subject: Negative Declaration re Trammell Crow Century City Property

This is a message from Con Howe.

Name: Con Howe  
Company/Department: Planning Department  
Phone number:  
E-mail address:

Comments:

Negative Declaration re Trammell Crow Century City Property

We were bewildered by the fact that the Planning Department has recommended that the city issue a negative declaration for the Trammell Crow property at 2049 Century Park East. The Tract No. 7260 Association believes that if the city does not modify Trammell Crow's development plans at the ABC Entertainment City, the existence of the new building will cause traffic havoc on Santa Monica, Olympic, and Pico Boulevards. Already, some of the intersections on those streets are at gridlock during the rush hour, and we fear that the change in the use of the property will have dire effects on rush hour traffic. We believe that most of the traffic generated by the current property occurs during off-peak hours because the major use of the property is for theatres. As you are aware most people who attend movies or theatrical productions drive to theatres during off-peak hours. However, the conversion of the property to mostly office use from mostly theatre use means at much of!

! the traffic that the new building will create will occur during rush hours. Consequently, we request that the city require an EIR for the property in order to determine whether our beliefs about the traffic are correct. We would also like to meet with you about this matter as soon as possible. Richard S Harnetz, Secretary, Tract No. 7260 Association.

# Cheviot Hills Homeowners Association

P.O. Box 64458 Los Angeles, Ca. 90064 (310) 335-5622

December 3, 2001

Mayor James Hahn  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

City Attorney Rocky Delgadillo  
City Hall East, Room 1800  
200 North Main Street  
Los Angeles, CA 90012

Councilman Jack Weiss  
City Hall, Room 440  
200 North Spring Street  
Los Angeles, CA 90012

Con Howe  
Director of Planning, City of Los Angeles  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Re: ABC Entertainment Center Renovation  
Project Title: EVN-2001-4027-MND  
Case No. DIR-2001-4026-SPR

Dear Elected Officials and City Agencies:

The Board of Directors of the Cheviot Hills Homeowners Association met with Daniel J. Niemann, Senior Vice President of Trammell Crow Company, on November 27, 2001 regarding the proposal for the site currently occupied by the Schubert Theatre, the Lowe's Cineplex and adjoining buildings in Century City (Project). Though the Project is of significant size and scope (768,947 square feet), the developer has requested the City of Los Angeles to issue a Mitigated Negative Declaration (MND) rather than a conventional application with full environmental impact review. There is no basis for the City to issue such a "toothless" blanket approval of a development given its negative impacts on our community. Furthermore, the developer has, to date, failed to detail the specific use of the square footage upon which traffic generation is determined.

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The California Environmental Quality Act (CEQA) was adopted to force complete disclosure of developments of this type to enable meaningful mitigation of adverse environmental impacts. After studying the MND provided by Trammell Crow, we find it totally deficient and lacking of any discussion of traffic despite construction of a building almost equal in size to one of the Century City twin towers. The basic premise underlying this project and use of the MND is that no additional car trips will result. By manipulating the statistical model used for these purposes (e.g. eliminating 1,000 car trips for the McDonald's located in the current center), Trammell Crow is attempting to convince the City and the affected communities that no additional traffic will result from the Project. This is absurd on its face. Even if fully occupied, the current ABC Entertainment Center would generate far fewer car trips than what will result from the Project. By replacing theatre space with office space significantly more traffic will result. The current restaurants serve patrons already parked at nearby offices and those who walk to the center during the business day. The Schubert Theatre and Lowe's Cineplex are used primarily in the evening and on weekends, thus not contributing to peak hour car trips. In contrast, the Project will generate additional peak hour traffic as additional office workers travel to and from work.

The Board of Directors takes strong exception to the developer's position that any affected community should seek legal remedies in court if they don't like the Project. It is the duty of City departments and the City Council to insure that negative impacts are thoroughly addressed prior to granting building approval. Our community should not have to resort to the court for legal remedies when the City has the power to address the problems now, before it is too late!

On behalf of its 1400 homes, the Cheviot Hills Homeowners Association strongly requests an extensive, thorough and comprehensive EIR on this development to properly insure legal and adequate protection for those living and working nearby. This development cannot be sanctioned without full disclosure, thorough review, and meaningful mitigation.

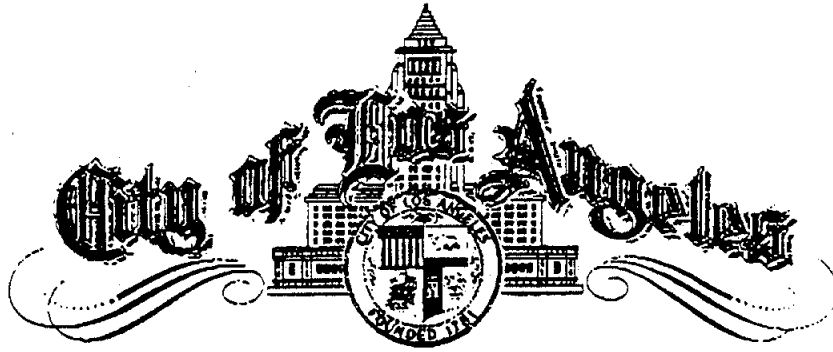
Sincerely,



Stan Arcader, President

- Cc: Office of the City Clerk
- The Los Angeles Times
- The Los Angeles Business Journal
- Fred Gaines, Esq.

CITY HALL  
200 N. Spring Street  
Rm. 440  
Los Angeles, CA 90012  
(213) 485-5013  
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weiss@council.lacity.org



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Sherman Oaks, CA 91423  
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Fax: (818) 768-9210

WEST L. A. OFFICE  
822 S. Robertson Blvd.  
Ste. 102  
Los Angeles, CA 90035  
(310) 289-0353  
Fax: (310) 289-0365

**JACK WEISS**  
Councilmember, Fifth District

December 11, 2001

Con Howe  
Director  
Los Angeles City Planning Department  
City Hall  
Los Angeles, CA 90012

Re: Proposed ABC Entertainment Center/2000 Avenue of the Stars Project

Dear Con:

I am writing to request that the Planning Department require the completion of a full environmental impact report ("EIR") with respect to the current proposal to redevelop the ABC Entertainment Center property, located at 2000 Avenue of the Stars in Century City.

I share the concerns of many in the communities surrounding Century City that the potential impacts of this proposed development – and in particular, the potential traffic impacts – be fully studied and considered prior to any determination to proceed with the project. An EIR will enable policymakers and community members to gain a better understanding of the long-range ramifications of the project. The EIR process will also provide community members with a more appropriate opportunity to have their concerns and questions about the project addressed.

Thank you for your consideration of this request. Please feel free to contact me or my Westside Planning Deputy, Renee Schillaci, at (310) 289-0353 should you wish to discuss this request further.

Sincerely,

  
JACK WEISS

Chair: Arts, Health & Humanities ♦ Vice Chair: Budget & Finance ♦ Member: Public Safety





**PRATAPADITYA PAL**

10582 CHEVIOT DRIVE  
LOS ANGELES, CALIFORNIA 90064

Tel: (310) 839-8547

Fax: (310) 815-0192

E-Mail: lpal102052@aol.com

Hanukkah 2001

Councilman Jack Weiss  
City Hall, Room 440  
200 N. Spring St.  
Los Angeles, CA 90012

Re: ABC Entertainment Center Renovation  
Project Title: EVN-2001-4027-MND  
Case No. DIR-2001-4026-SPR

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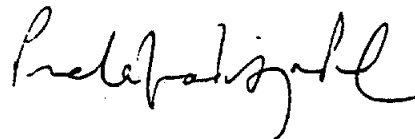
Dear Councilman Weiss,

Firstly, a happy Hanukkah! I just spoke with a very nice lady in your W.LA office and was glad that I did not encounter a machine but a courteous, warm human being.

I just want to confirm in writing my alarming concern in the above matter without an EIR of any kind being required by your office.

We have lived at this address since 1972 - 30 years in February- and I must say, the steady deterioration of our neighborhood because of largely unbridled development in Century City has been "terrorizing", to use a familiar term today. We are after all your constituents and have a right to demand the courtesy of a fair hearing on an issue that will impact our lives in extremely negative ways.

Sincerely,



cc. The Board of Directors  
Mayor Hahn  
Rocky Delgadillo  
Con Howe



TDG-LA, Inc dba

# THE DONATY GROUP

Corporate Real Estate

December 10, 2001

Mayor James Hahn  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

City Attorney Rocky DelGadillo  
City Hall East, Room 1800  
200 North Spring Street  
Los Angeles, CA 90012

Councilman Jack Weiss  
City Hall, Room 440  
200 North Spring Street  
Los Angeles, CA 90012

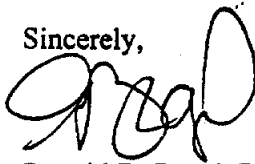
Con Howe  
Director of Planning, City of Los Angeles  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Re: ABC Entertainment Center Renovation  
Project Title: EVN-2001-4027-MND  
Case No. DIR-2001-4026-SPR

Gentlemen:

As a resident of Cheviot Hills, I strongly urge you to order a thorough and comprehensive Environmental Impact Report for the ABC Entertainment Center Renovation. Cheviot Hills stands to bear greatly increased traffic, noise and pollution as a direct result of this project.

Sincerely,



Ronald D. Bagel, President  
TDG-LA, Inc., dba The Donaty Group

Cheviot EIR 121001.doc

Suite 430  
605 West Olympic Boulevard  
Los Angeles, CA 90015  
Tel: (213) 749-6655  
Fax: (213) 891-2892

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DEC 11 2001

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December 8, 2001

Mayor James Hahn  
cc:  
City Attorney Rocky Delgadillo  
Councilman Jack Weiss  
Con Howe, Director of Planning  
City of Los Angeles

Re: ABC Entertainment Center Renovation  
Project Title: EVN-2001-4027-MND  
Case No. DIR-2001-4026-SPR

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DEC 11 2001  
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ROOM 1640

Dear Elected Officials and City Agencies:

I recently received mail from the Trammel Crow Company extolling the virtues of their project in Century City. It is nice to know that they are interested in revitalizing older properties. Regardless of their motivations, the "revitalization" should not be allowed without the proper courses of action demanded of any project under development in Los Angeles.

Trammel Crow claims to be exempt from having to follow the normal channels that are required of all projects. They claim that they are exempt from filing a proper Environmental Impact Report and that they have adequate parking which is based upon some very fuzzy math and other criteria from the late 1960's. Instead of acting responsibly, they are disregarding the wishes of the people of Los Angeles who require accountability of all development. They have asked the City of LA to issue a Mitigated Negative Declaration rather than a conventional one. Trammel Crow wants to work under guidelines of what was allowed 40 years ago. I am asking you to make sure that Trammel Crow follows all procedures that are required in this 21<sup>st</sup> Century. We've come a long way in changing the way we view development. The City would not let a building be constructed using 1965 earthquake requirements, even though it is a "revitalization" of a 1965 building. Why then allow a developer to use any other antiquated standards, including results from EIR's from a past era?

It is paramount that our elected officials follow the surrounding community's wishes. These communities stand to suffer gravely from the increased traffic and pollution generated by this huge project. Make no mistake about the size of this proposed structure. This horizontally designed building is almost the same square footage of one of the twin (vertical) towers.

The renderings of this building show many other flaws. This oversized building is completely out of scale and appears to loom down over the Avenue of the Stars for a full city block. In bulk alone it eclipses the Century Plaza Hotel which, even though large itself, seems welcoming in that it curves away from the street. The new structure would feel better if it mirrored that is some way, keeping the very center of Century City more open to light and air, hence welcoming rather than overwhelming. In attempting to break up the hulking mass, the developers have chosen to place a huge hole in the center of the structure. I find it difficult to believe this feature (looking

as though it was bombed out) will diminish the ferocious winds that already blow through the area. Do not be lured into this project by the park like grounds they are depicting in their presentations. While they have presented this aspect in a pleasing form and have proposed using the area for concerts, the wind gusts and shadowing of morning and afternoon sun will keep this area from being enjoyed.

When I visit my clients in the existing Twin Towers any time after the start of a day's business hours, I can rarely find parking. This happened when the Schubert was active and continues to happen now that "the site" is quite empty. I have spent upwards of 20 minutes driving the width of the floors and up and down levels. TC claims that there will be adequate parking, even after they widen the columns under their proposed project. Column widening will narrow and/or eliminate parking spaces. No matter how they present the numbers, there already is a huge parking deficit. You must not overlook this problem, just as you do not overlook it with any other City project.

The car trips generated by the massive amount of office space will overburden the local streets. During rush hour, Motor Avenue and the canyons are already beyond capacity. No one wants to sit in the extra traffic that all this square footage will generate. The square footage must be greatly reduced in order for this project to become an acceptable neighbor.

Every time new building is proposed in Century City, Cheviot Hills is promised traffic mitigation. When new buildings are completed, promises are forgotten and Cheviot Hills' Motor Avenue ends up with increased traffic, noise and pollution. There just isn't any more room for more commuter traffic. Proper solutions to the traffic problems caused by new development must be found. If commuting to Century City becomes impossible, Century City will cease to be a place anyone will want to go. "Revitalization" will become a dead issue!

Sincerely,



Nancy Samovar

Formerly, an architectural intern with Raleigh Enterprises

Currently, an expert in courtroom exhibits, Just In Case Exhibits



Michelle Phillips

Con Howe  
Dir. of Planning  
City of Los Angeles  
City Hall  
Los Angeles

Dec. 6, 2001

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DEC 11 2001

EXECUTIVE DEPT  
OFFICE  
ROOM 1640

Dear Mr. Howe:

As a resident of Cheviot Hills I am very  
troubled that a thorough and comprehensive  
Environmental Impact Report has not been  
demanded by Councilman Jack Weiss for  
the ABC Entertainment Center in Century City.  
The developers of the project have requested  
instead that the City of Los Angeles issue  
a Mitigating Negative Declaration.

This is not enough.

There is no basis for the city to issue  
this blanket approval given its impact  
on our community.

Our neighborhood has already suffered voluminous traffic congestion by the 20th Century Fox expansion and a few years ago by the Westside Pavilions' extension. We need to go into the Century City ABC Project with our eyes wide open. Please demand an EIR. Let me know your thoughts.

Many thanks,  
Michelle Phillips

ABC ENTERTAINMENT  
RENOVATION  
PROJECT TITLE: EVN-20014027MND  
CASE NO. DIR-2001-4026-SPR

C.C. Mayor Hahn  
Councilman Weiss  
City Attorney Rocky  
DeGardes

Michelle Phillips  
10557 Troon Avenue  
Los Angeles, Ca. 90064  
310-2041617

FRED GAINES  
SHERMAN L. STACEY  
LISA A. WEINBERG  
REBECCA A. THOMPSON  
NANCI SESSIONS-STACEY

LAW OFFICES OF  
**GAINES & STACEY**  
WARNER CENTER PLAZA  
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WOODLAND HILLS, CA 91367-4901

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(310) 394-1163  
FACSIMILE (818) 593-6356  
INTERNET: WWW.GAINESLAW.COM

December 12, 2001

ORIGINAL SENT BY U.S. MAIL

VIA FACSIMILE (213) 978-1275

Con Howe, Director  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, 5th Floor  
Los Angeles, CA 90012

Re: 2000 Avenue of the Stars  
Project No. ENV-2001-4027-MND  
Case No. DIR-2001-4026-SPR  
Comments on Proposed Mitigated Negative Declaration 553-01-PL

Dear Mr. Howe:

This letter is submitted on behalf of our client, the Cheviot Hills Homeowners Association, for the purpose of providing comment and criticism with regard to the Initial Study and Proposed Mitigated Negative Declaration ("MND") for the above-referenced 2000 Avenue of the Stars project (the "Project"). As detailed below, the MND is based on faulty analysis and is legally inadequate. Because there is a fair argument that significant impacts from the project may occur, an Environmental Impact Report ("EIR") must be prepared and circulated. *No Oil, Inc. v. City of Los Angeles*, 13 Cal.3d 68, 75 (1974). Additionally, whether you go forward with the MND or an EIR, given the size and scope of the project, and the substantial public controversy surrounding it, public hearings should be held to solicit comments regarding the MND or EIR, and with regard to the review of the revised and recirculated studies and draft and final EIR which may result.

I.  
INTRODUCTION.

The Cheviot Hills Homeowners Association is an unincorporated association of property owners and residents in the Cheviot Hills area, and in particular along the Motor Avenue corridor directly south of the proposed Project. Motor Avenue, once a quiet and highly sought after residential address, has become one of the Los Angeles area's most significant traffic nightmares. The traffic congestion, noise, pollution and other impacts on this area have been exacerbated by the high concentration of commercial development that has occurred in the Century City North Specific Plan area. While the

Con Howe, Director  
December 12, 2001  
Page 2

Plan area. While the City has claimed that the traffic impacts of other recent projects (most notably the Fox Studios expansion) on the Cheviot Hills area would be mitigated, the truth is that years after that project was complete, the area is just as badly impacted as before. The fact that this new Project, which is larger than the buildings it will replace, will add additional traffic trips each day to this already heavily congested area is a cause for alarm for the Cheviot Hills Homeowners Association and for all who travel the Motor Avenue corridor.

Following a brief summary of argument, this letter will set forth in detail the Cheviot Hills Homeowners Association's objections to the Initial Study and MND. The letter first sets forth the legal inadequacies of the MND, then provides a paragraph by paragraph discussion of the substantive issues raised in the Initial Study. It should be noted that the arguments and evidence presented herein are in addition to any other arguments or evidence which the City may receive from individual members of our client association.

## II. SUMMARY OF ARGUMENT.

The MND for the proposed Project is legally inadequate, and an EIR must be prepared and circulated for all of the following reasons:

- Project Description.  
The project description in the initial study differs in some significant respects from the environmental impact analysis, making it unclear whether the initial study analyzed the impacts of the proper Project.
- Traffic.  
The MND and Initial Study are woefully inadequate with regard to their analysis of traffic, transportation, circulation and parking impacts. Most glaringly, the Initial Study fails to use actual trip count data for the existing uses on the site of the proposed project. By inflating the trips generated by the existing restaurants and retail, the Initial Study absurdly concludes that the proposed Project will generate less traffic than the existing Project. This conclusion is simply a transparent attempt to bypass the need for a Project Permit under the Century City North Specific Plan, and the need for an EIR to analyze the Project's traffic impacts.
- Air Quality.  
The MND and Initial Study fail to provide any meaningful analysis of air quality impacts as a result of the utilization of improper assumptions regarding traffic generation.



- Land Use.  
The Initial Study inaccurately concludes that the Project will not require a Project Permit under the Century City North Specific Plan ("CCNSP") because it will not create any net new trips. This conclusion, however, is based on the erroneous assumptions regarding existing trip generation from the flawed traffic analysis.
- Cumulative Impacts.  
The discussion of cumulative impacts in the MND and Initial Study is woefully inadequate. These documents conclude that the project does not contribute to cumulative impacts based on the undercounting of traffic and air quality impacts referenced above. The document does not recognize that the Project's impacts must be considered in relation to those caused by the Fox Studios expansion, the JMB project in Century City, and the proposed expansion of the Century City Shopping Mall.

In light of the deficiencies noted above, the Initial Study should be revised and a Draft EIR must be prepared and circulated for comment. In addition, given the tremendous public controversy surrounding the project, and the project's potential to cause significant environmental impacts in the community, public hearings should be held with regard to the scoping of the Draft Environmental Impact Report and to provide the community with the appropriate opportunity to understand and provide information with regard to the Draft Environmental Impact Report for this project.

III  
THE INITIAL STUDY AND MND ARE LEGALLY INADEQUATE AND ADOPTION  
WOULD CONSTITUTE PREJUDICIAL ERROR AND ABUSE OF DISCRETION.

The California Environmental Quality Act ("CEQA") requires that the City prepare an EIR for any project for which there is a "fair argument" that significant impacts from the project may occur. *No Oil, Inc. v. City of Los Angeles*, 13 Cal.3d 68, 75 (1974).

"Said another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." CEQA Guidelines § 15064(f)(1), citing *No Oil, supra* (emphasis added).

A mitigated negative declaration, such as the one proposed by the City in this matter, is permissible only when, after completing an initial study, a lead agency rationally determines that a project as mitigated "would not have a significant effect on the environment." Public Resources Code § 21080(c). Such a determination can be made only if "[t]here is no substantial evidence in light of

Con Howe, Director  
December 12, 2001  
Page 4

the whole record before the lead agency" that such an impact *may* occur. Public Resources Code § 21080(c)(1)(emphasis added); CEQA Guidelines § 15070(a).

Furthermore, an EIR may be required even if there is an absence of concrete "substantial evidence" of potential significant impacts in the record. In *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 311 (1988), the Court explained that because "CEQA places the burden of environmental investigation on government rather than the public," an agency "should not be allowed to hide behind its own failure to gather relevant data." The court added:

"If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record. Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Id.*

The "fair argument" standard creates a "low threshold" for requiring preparation of an EIR. *Citizens Action to Serve All Students v. Thornley*, 222 Cal.App.3d 748 (1990); *Sundstrom, supra*, 202 Cal.App.3d at 310. The standard is founded upon the principle that, because adopting a negative declaration has a "terminal effect on the environmental review process" (*Citizens of Lake Murray Area Association v. City Council*, 129 Cal.App.3d 436, 440 (1982)), an EIR is necessary to resolve "uncertainty created by conflicting assertions" and to "substitute some degree of factual certainty for tentative opinion and speculation" (*No Oil, supra*, 13 Cal.3d at 85).

Where, as here, a mitigated negative declaration is not permissible, CEQA requires a lead agency to certify a Final EIR as complete and in compliance with CEQA, and to consider the information contained therein, before approving a project. See Public Resources Code §§ 21000 *et seq.*; State CEQA Guidelines ("Guidelines"), California Code of Regulations, Title 14, §15090. An adequate EIR must be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences of the project being studied. See Guidelines § 15151. The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and consider meaningfully the issues raised by the proposed project. See *Laurel Heights Improvement Association v. Regents*, 47 Cal. 3d 376, 405 (1988). Although CEQA does not mandate perfection, prejudicial abuse of discretion occurs if the failure to include relevant information in the EIR precludes informed decision making and informed public participation, thereby "thwarting the statutory goals of the EIR process." See *Laurel Heights, supra*, 47 Cal. 3d at 403-405. In short, CEQA requires an EIR to include a good faith effort at full disclosure. See Guidelines §15151.

Achieving the CEQA purpose of preserving and enhancing the environment requires adequate disclosure of project information and active involvement of the public at each stage of the decision making process. Under CEQA, decisions regarding a proposed project cannot be made in a vacuum or under a veil of secrecy. Rather, they must be made under the watchful eye of the public so as to reassure "an apprehensive citizenry that the agency has, in fact, considered the ecological implications of its actions," *No Oil, supra*, 13 Cal.3d at 86, and to affirmatively demonstrate that the environment is being protected. *People ex rel. Department of Public Works v. Bosio*, 47 Cal.App.3d 495, 528 (1975).

As the foundation on which project decisions are made, the EIR is the "heart" of this public review process. See *County of Inyo v. Yorty*, 32 Cal. App. 3d 795, 810 (1973); *Laurel Heights Improvement Association v. Regents* ("Laurel Heights II"), 6 Cal. 4th 1112, 1123 (1993); Guidelines §15003(a). The EIR serves as an "environmental alarm bell" whose purpose it is to alert the public and its responsible officials to the environmental impacts associated with a proposed project. See *County of Inyo, supra*, 32 Cal. App. 3d at 810. The public's ability to analyze and make comments on the adequacy of the EIR is therefore critical to insure all relevant information is considered before a decision with potentially significant and irreversible effects is made. See *Laurel Heights, supra*, 47 Cal. 3d at 392; *Laurel Heights II, supra*, 6 Cal. 4th at 1123; and *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553, 564 (1990).

The principles of public comment and informed decision making apply with full force to the proposed MND for the 2000 Avenue of the Stars Project. However, as discussed below, both the Initial Study and the MND are seriously defective and, therefore, do not meet the requirements mandated by CEQA. The Initial Study and MND are so fundamentally flawed that CEQA's goal of meaningful public participation and informed decision-making can only be achieved by revising the Initial Study and preparing and circulating a Draft Environmental Impact Report. Many of the Project's most significant environmental impacts have been grossly understated or swept under the rug, and adoption of the MND in its current form would constitute a prejudicial abuse of discretion. Accordingly, the Cheviot Hills Homeowners Association object to the adoption of the MND and to the approval of the project for all of the following reasons.

A. Inadequate Project Description.

CEQA requires an accurate and consistent project description. See Guidelines § 15124. An accurate description is necessary to determine the scope of environmental review. Courts have repeatedly found that only through an accurate view of the project may affected outsiders and public decision makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantages of terminating the proposal, and weigh other alternatives in the balance. An accurate, stable and finite project description is the "sine qua non" (indispensable requisite) of an informative and legally sufficient EIR. See *McQueen v. Board of Directors*, 202 Cal App. 3d 1136, 1143 (1988); *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185 (1977).

The project description in the Initial Study fails to meet the standards as it is neither accurate, stable, nor finite. For example, the project description states that the Project will have 25,520 square feet of restaurant uses (Initial Study, p. 2-4), while the traffic analysis is based on an FAR of 15,264 square feet of high turnover restaurant uses and 15,263 square feet of quality restaurant uses, for a total of 30,527 square feet of restaurant uses (Initial Study, p.4-76). The project description states that the Project will have 12,200 square feet of retail uses (Initial Study, p. 2-4), while the traffic analysis is based on an FAR of 18, 318 square feet of retail uses (Initial Study, p.4-76). Finally, the project description states that the Project will have 6,300 square feet of cultural uses (Initial Study, p. 2-4), while the traffic analysis is based on an FAR of 10,178 square feet of cultural uses (Initial Study, p.4-76). These discrepancies are masking a significant variation in the Project's traffic impacts.

Likewise, the project description states that the Project parking garage will provide "up to 367 new parking stalls" (Initial Study, p. 2-6), while the traffic analysis claims that the parking garage will have "a total of 372 net new spaces" (Initial Study, p. 4-77)—which conveniently is the minimum required to meet City Code requirements. This discrepancy is masking a significant variation in the Project's parking impacts.

A project description that omits, or allows modification of, significant integral components of the project will result in an MND or EIR that fails to disclose the actual impacts of the project. See *Santiago County Water District v. County of Orange*, 118 Cal App 3d 818 (1981). In this case, the project description has ignored the CEQA rules and many of the important facts of the project, thereby frustrating the goal of fostering meaningful public participation in the CEQA process. Therefore, since the project description is inadequate, inaccurate, vague and unstable, the analysis of the project impacts is inadequate as well, and precludes informed decision-making.

B. Traffic.

The Initial Study and MND are woefully inadequate in their analysis of traffic, parking, circulation and transportation impacts which will be caused by the proposed project. The deficiencies in this area are virtually top to bottom. Starting with the existing condition information, the Initial Study assumes ridiculously inflated trip counts for the existing uses, trying to make it seem as though the proposed Project will not create additional trips. This is shown in the absurd claim, for example, that the McDonalds and other fast-food type restaurants in the Entertainment Center generate 4,873 average daily trips. This flies in the face of the obvious reality that virtually none of the visitors to the McDonalds or other fast-food restaurants in the center have made a special vehicle trip there, and paid \$16 per hour to park, for those uses. An actual trip count, including a survey of patrons of those restaurants, would certainly show that virtually all of those trips are "pass-bys," or people who walked to the restaurants from their adjacent offices, or before visiting the movie theater or Shubert Theatre.

By inflating the trips generated by the existing restaurants, retail and theatres the Initial Study absurdly concludes that the proposed Project will generate less traffic than the existing Project. This conclusion is simply a transparent attempt to bypass the need for a Project Permit under the Century City North Specific Plan, and the need for an EIR to analyze the Project's traffic impacts.

C. Air Quality.

The MND and Initial Study fail to provide any meaningful analysis of air quality impacts as a result of the utilization of improper assumptions regarding traffic generation. The failure to utilize appropriate basic data regarding increases in traffic generation results in the Initial Study and MND incorrectly finding no significant impact to air quality during operation of the Project. At maximum occupancy of the site, a quantitative determination completely lacking from the Initial Study, significant air quality impacts will occur. The complete failure of the Initial Study and MND to seriously review air quality impacts renders them defective and requires both restudy and circulation of a Draft Environmental Impact Report.

D. Land Use.

The Initial Study inaccurately concludes that the Project will not require a Project Permit under the Century City North Specific Plan ("CCNSP") because it will not create any net new trips. This conclusion, however, is based on the erroneous assumptions regarding existing trip generation from the flawed traffic analysis. Once a proper trip generation study is conducted based on actual traffic counts, it will be apparent that the proposed Project will create new trips, and a Project Permit will be required under the CCNSP. Thus, the Initial Study and MND fail to describe and analyze a potential significant adverse impact on land use in the Project area primarily as the result of a failure to include any detailed description of the land use approvals needed for the Project and to correctly identify the need for additional land use approvals. Without such proper definitions it is, of course, impossible for the Initial Study and MND to provide sufficient analysis of the Project's affect on land use and of the cumulative affect of this approval along with recent land use approvals on other properties in the area.

E. Cumulative Impacts.

An EIR must not only analyze the environmental effects of a project, but also the cumulative effects of the project together with past, present and future projects producing related impacts. See, e.g. Public Resources Code §21083(b); Guidelines §15131. Such an analysis must also include an evaluation of the growth inducing effects of the project. In addition, an Initial Study and/or EIR must include an analysis of the environmental effects of actions that are a reasonably foreseeable consequence of the initial project that will likely change the scope or nature of the initial project or its environmental effects. See Laurel Heights, supra, 47 Cal. App. 3d at 396.

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Here, if a project ever called out for a detailed analysis of cumulative impacts, it is this one. That is true because it is in fact the cumulative effect of the four major projects within a one mile radius of the Project site that have caused many of the existing environmental impacts in the area.

Nevertheless, the discussion of cumulative impacts in the MND and Initial Study is woefully inadequate. These documents conclude that the project does not contribute to cumulative impacts based on the undercounting of traffic and air quality impacts referenced above. The document does not recognize that the Project's impacts must be considered in relation to those caused by the Fox Studios expansion, the JMB project in Century City, and the proposed expansion of the Century City Shopping Mall.

#### IV. SPECIFIC DEFICIENCIES OF THE INITIAL STUDY.

This section of the letter will provide specific page by page comments on the substantive deficiencies in the Initial Study.

##### Page 2-4 of the Initial Study:

The Project Description section of the Initial Study states that the Project will have 25,520 square feet of restaurant uses, while the traffic analysis is based on an FAR of 15,264 square feet of high turnover restaurant uses and 15,263 square feet of quality restaurant uses, for a total of 30,527 square feet of restaurant uses (Initial Study, p.4-76). The Project Description states that the Project will have 12,200 square feet of retail uses, while the traffic analysis is based on an FAR of 18,318 square feet of retail uses (Initial Study, p.4-76). Finally, the Project Description states that the Project will have 6,300 square feet of cultural uses, while the traffic analysis is based on an FAR of 10,178 square feet of cultural uses (Initial Study, p.4-76). These discrepancies are masking a significant variation in the Project's traffic impacts.

##### Page 2-6 of the Initial Study:

Likewise, the Project Description states that the Project parking garage will provide "up to 367 new parking stalls," while the traffic analysis claims that the parking garage will have "a total of 372 net new spaces" (Initial Study, p. 4-77)—which conveniently is the minimum required to meet City Code requirements. This discrepancy is masking a significant variation in the Project's parking impacts.

##### Page 2-13 of the Initial Study:

Here the Initial Study claims that the Project will provide approximately 550 new parking spaces, with a total of 372 net new spaces. But at page 4-77, the initial study claims that the Project will provide only approximately 500 new spaces. It is impossible to tell which of these "approximations" are more accurate, or if either one is.

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Page 4-11 through 4-12 of the Initial Study:

Here the Initial Study admits that the proposed Project is “[r]eplacing this [current] nighttime driven entertainment use [with] office facilities, which are primarily a daytime activity.” While this is stating the obvious, it does not seem to have occurred to those preparing the traffic and air quality analyses, who take no notice whatsoever that the nighttime off-peak theatre trips will be replaced by peak hour daytime office trips.

Page 4-12 of the Initial Study:

The Initial Study oddly does not mention the Century Plaza Hotel as a use that is potentially sensitive to light from the proposed Project.

Page 4-21 of the Initial Study: A Q

The Initial Study blithely concludes that “the proposed Project would generate fewer trips than the existing uses. Therefore, the Project would result in less traffic on local roadways. Pollutant concentrations along roadways and intersections in the vicinity of the Project would remain the same or be slightly reduced with the Project.” These conclusions are based on the flawed traffic analysis which overstates existing trips in order to make the proposed Project’s trips appear benign. Furthermore, this conclusion does not take into account that the concentrations of trips will be greater during peak hours with the proposed Project as a result of the preponderance of daytime uses, as opposed to the nighttime oriented existing uses. The failure to do any real air quality analysis for this massive Project is inexcusable.

Page 4-24 of the Initial Study:

The Initial Study claims that “Air pollutant emissions would be less with the proposed Project than with continuation of the current uses. Emissions would be reduced by approximately 35% with the Project.” This outrageous 35% conclusion is not supported by any facts in the Initial Study.

Furthermore, the text completely ignores the numbers in Table 4.3-7 showing ~~that~~ the proposed Project will exceed SCAQMD Thresholds for CO, ROG, and NOx by up to 800%. This admission alone mandates that an EIR be prepared to develop appropriate mitigation measures for this Project’s significant air quality impacts.

Page 4-47 through 4-51 of the Initial Study:

The Initial Study inaccurately concludes that the Project will not require a Project Permit under the Century City North Specific Plan (“CCNSP”) because it will not create any net new trips. This conclusion, however, is based on the erroneous assumptions regarding existing trip generation from the flawed traffic analysis. Once a proper trip generation study is conducted based on actual traffic counts, it will be apparent that the proposed Project will create new trips, and a Project Permit will be required under the CCNSP. Thus, the Initial Study and MND fail to describe and analyze a potential significant adverse impact on land use in the Project area primarily as the result of a failure to include any detailed description of the land use approvals needed for the Project and to correctly

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identify the need for additional land use approvals. Without such proper definitions it is, of course, impossible for the Initial Study and MND to provide sufficient analysis of the Project's affect on land use and of the cumulative affect of this approval along with recent land use approvals on other properties in the area.

Pages 4-74 and 4-76 of the Initial Study:

Table 4.15-2 claims that the existing high-turnover restaurant uses at the Project site generate 1,087 AM peak hour trips, and 1,273 PM peak hour trips. However, Table 4.15-3, at page 4-76 claims that these same existing high-turnover restaurant uses at the Project site generate 4,873 average daily trips, and 1,514 PM peak hour trips. These conflicting numbers cannot both be right, and they all are ridiculously high.

To believe that the McDonalds and other fast-food restaurants on site generate 4,873 average daily trips, we would have to believe that 203 trips per hour were made, 24 hours a day, to the ABC Entertainment Center in Century City just to buy a burger and fries. And to purchase this 99¢ meal, we must believe that these 203 carloads per hour, 24 hours a day, were willing to pay \$16.00 per hour to park. When there are two McDonalds drive-throughs within a one mile radius. Come on.

Page 4-77 of the Initial Study:

The Initial study is impermissibly vague about the Project's potential parking impacts. It states that the Project will remove "approximately 128" parking spaces, and that the Project will add "approximately 500" new parking spaces, resulting in an on-site parking supply of "approximately 5,843" spaces. Adding this "approximation" to the 451 off-site dedicated parking spaces, the Initial Study somehow concludes that there will be a "minimum" of 6,294 spaces, which just happens to be the minimum number of spaces required for the Project under City Code.

Of course, there is absolutely no basis in the facts provided to conclude that the Project will provide sufficient parking for the proposed uses. If, for example, the "approximately 500" spaces added turn out to be 475, and if the "approximately 128" spaces removed turn out to be 156, the project could find itself short 53 parking spaces. Thus, there is no basis in the Initial Study for the it or the MND to conclude that the Project will not have a significant adverse impact on parking.



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V.  
CONCLUSION

In conclusion, the Initial Study and MND are legally inadequate. The Initial Study must be substantially revised, and an EIR prepared and circulated prior to certification. In addition, given the lack of analysis of public controversy and the scarcity of detail present in the Initial Study, public scoping of the Draft EIR should be conducted. Finally, public hearings with wide community notice should be held prior to the issuance to any Final EIR for this project.

Thank you for your consideration.

Sincerely,

GAINES & STACEY

By

  
FRED GAINES

cc: The Honorable Rockard J. Delgadillo  
The Honorable Jack Weiss  
George J. Muhlsten, Esq.

HOWARD J. GORIN  
LEONARD C. KOHN

e-mail: hjgorin@aol.com  
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Administrator:  
KATHY FISHER

Sr. ParaLegal:  
LETICIA ROMERO

December 11, 2001

Con Howe,  
Director of Planning, City of Los Angeles  
City Hall  
200 North Spring Street  
Los Angeles, California 90012

RECEIVED  
CITY OF LOS ANGELES

DEC 12 2001

RE: ABC Entertainment Center Renovation  
Project Title: EVN-2001-4027-MND  
Case No. DIR-2001-4026-SPR

EXECUTIVE DEPT  
OFFICE  
ROOM 1640

Dear Mr. Howe:

I am a homeowner in Cheviot Hills, City of Los Angeles.

I am advised that Trammell Crow Company, the developer of the proposed site for the above referenced development project (formally the Schubert Theatre), has requested the City of Los Angeles, to issue a Mitigated Negative Declaration (MND) rather than a conventional application with full environmental impact review.

There is no basis for the City to issue such a "toothless" blanket approval of a development given its negative impacts on the community.

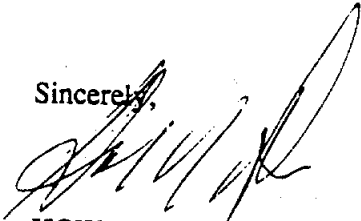
In addition, the developer has failed to detail the specific use of the square footage upon which traffic generation is determined.

I take strong exception to the developer's position that any affected community should seek legal remedies in court if they don't like the Project. It is the duty of City departments and the City Council to insure that negative impacts are thoroughly addressed prior to granting building approval. Our community should not have to resort to the courts for legal remedies when the City has the power to address the problems now, before it is too late!

I strongly request an extensive, thorough and comprehensive EIR on this development to properly insure legal and adequate protection for those living and working nearby. This development should not be sanctioned with full disclosure, thorough review, and meaningful mitigation.

Law Office of  
**HOWARD J. GORIN**  
Attorneys at Law

Sincerely,



**HOWARD J. GORIN**

CC: Office of the City Clerk  
Mayor James Hahn  
City Attorney Rocky Delgadillo  
The Los Angeles Times  
The Los Angeles Business Journal  
Fred Gaines, Esq.

*Cheviot Hills Homeowners Association*

P.O. Box 64458 Los Angeles, Ca. 90064 (310) 335-5622

**SCOPING MEETING--JANUARY 14, 2002****OVERVIEW**

The Cheviot Hills Homeowners Association (CHHA) is comprised of 1400 homes located directly to the south of Century City. Due to our close proximity to Century City and the 10 freeway, we are known as the westside's "cut-through" community. Cheviot Hills is clogged with traffic generated by The Fox Expansion Project. Soon JMB will add it's traffic to our community and the city is now reviewing plans to expand the Century City Shopping Mall. To the south, the Sony renovation at the southern end of Motor Avenue has only added to our community's already overburdened streets.

All of these developments have been individually reviewed carefully by the city. All completed the requisite EIR—but none were studied in conjunction with one another. The cumulative impacts of these projects has never been analyzed nor reviewed. Notwithstanding the well known traffic burdens suffered by Motor and Manning Avenues, JMB's recent EIR omitted these streets in all of its studies. The City of Los Angeles never required study of these significantly impacted streets before granting JMB approval of its project.

Cheviot Hills cannot continue to absorb traffic from more expansion in Century City. Streets designed to carry 14,000 cars a day are now carrying 25,000 to 30,000. The quality of residential life is suffering far beyond what developers are able to mitigate. LA DOT has proven its inability to mitigate additional traffic by it's failure to complete the Neighborhood Protection Plan it helped create and implement in conjunction with the Fox Expansion Project.

Every significant intersection in close proximity to this proposed project is already at level F which is unacceptable. It is particularly important to study and understand the PROCESS by which the city recognizes cars, car trips and traffic generation. Though prior developments have met city guidelines dictating car trips relative to square footage build-out, it is the REAL and ACTUAL additional cars on city streets which must be studied and addressed—NOT the theoretical formulas which bear little, if any, resemblance to what actually materializes on our streets everyday in Los Angeles.

Are commuters doomed to suffer gridlock in the name of progress and tax generation for Los Angeles? Can our residents be assured their quality of life issues will be protected before approval is granted? We urge you to carefully analyze what you will be creating when you approve this and other buildings in an already highly congested area of the city. With each new approval, residents are told this is the last project that will be approved in Century City. But before the concrete is dry, the lawyers and consultants are paid, and the lobbyists have left City Hall, the planning department is already reviewing the next Century City project to be built in the name of progress. Every new office building creates the most destructive and difficult traffic—that which arrives and departs at peak hours. Unlike the theatres, restaurants and entertainment center being replaced, this new office building will bring new traffic at a time during the day that our streets are unable to accommodate it.

### TRAFFIC

#### 1. Trip Generation

- a. We must know what the ACTUAL trip generation for the movie theatres, Schubert theatre, restaurants and adjunct businesses is NOW. How many AM & PM peak trips are actually generated CURRENTLY every morning and afternoon at the ABC Entertainment Center.
- b. The EIR must then study the AM & PM peak trip generation under the new project's land use configuration.

In other words, we want the EIR to separate the AM & PM peak trips existing NOW and what will be generated with the new building. We want the analysis to include studies of both weekend generation as well as weekday generation.

2. Change in Timing Patterns from Weekend/Evening to Monday through Friday 9-5. We believe the current usage generates little if any traffic as the restaurants, particularly McDonalds, Jamba Juice and the like serve those who work within walking distance of the ABC Entertainment Center. Those using the movie theatres or playhouse don't arrive at the complex at 9 AM and leave at 5 PM.

We need these numbers so we can have proper and effective mitigation of future traffic.

**3. Enforcement of Mitigation**

What are plans to enforce future mitigations? How will lack of enforcement be addressed? These are critical issues that must be addressed by the EIR.

Mitigations are meaningless without effective enforcement.

**4. Traffic Analysis**

- a. All traffic generation should be disclosed on an AM & PM peak traffic period. **NO AVERAGING!!!**
- b. We ask that no traffic studies be done during vacations, holidays, and religious holidays.
- c. All traffic analysis must include all of Cheviot Hills, including Motor Avenue and Manning Avenue. Neither of these streets nor any other streets within the boundaries of our homeowners association should be excluded in any traffic analysis or EIR.

**5. Other Traffic Issues**

- a. A traffic mitigation package should be separate from any payment made to LA DOT employees. Mitigation money should not pay staff salaries. Traffic Mitigation Budget should be available to public during entire project.
- b. We don't want any traffic mitigations dependent upon ATCS— we want **REAL** numbers as to what impacts project will have upon our community and surrounding streets. We want studies to indicate what mitigations **WILL** do, not what mitigations might do.
- c. Insure Overland Avenue widening project promised during Fox Expansion Project is complete **BEFORE** certificate of occupancy is issued for any new building projects in Century City. This widening is key to eliminating commuter traffic through Cheviot Hills.

**6. Suggested Traffic Mitigations to be provided by CHHA**

Analyze each of these suggested mitigations and what **REAL** impacts these mitigations will have upon traffic in our community.

**LAND USE**

1. City must require a Project Permit under the Century City North Specific Plan (CCNSP). Once a proper trip generation study is conducted based on actual traffic counts, it will be apparent that the proposed Project will create new trips and a Project Permit will be required under the CCNSP.

2. What is scope of alternatives to this building?
  - a. all alternatives to current proposed project must be studied.

### CONSTRUCTION/DEMOLITION OF ABC ENTERTAINMENT CENTER

1. Haul Route Plans
  - a. Provide specific routes
  - b. Provide specific time designations
  - c. Carefully govern staging of haul route vehicles outside residential communities
  - d. CHHA must be included in all haul route issues
2. Noise/Pollution during demolition
  - a. Hours/days of work
  - b. Pollution generated by demolition/dangerous substances (asbestos, PCB's, etc). We need strict controls of all pollution issues during demolition and building. Air and water samples should be taken and analyzed throughout demolition and building. All samples should meet city, state and federal safety guidelines.

### TENANT MIX/USAGE

1. How many restaurant uses are proposed? What is size and scope of proposed cultural center? What will the cultural center be used for specifically? Is the city of Los Angeles participating in any funding of this cultural center?
2. Are there any other uses planned for this project other than previously mentioned in conjunction with office space? Is there a plan for a gym facility? Private club(s)?
  - a. EIR should include all uses and specifications for interior and exterior of project.
3. Where will entrances/exits to project be? How will current security checkpoints affect entrances in proposed project?
4. EIR should designate that ALL mitigations must be agreed to and in place BEFORE certificate of occupancy is issued assure protection of all negatively impacted communities.
5. How many square feet are being allocated for restaurant space?
6. No heliport or helicopter landing pad will be built on Century City site.
7. EIR must include size/usage of cultural facility.
8. Usage and schedule of events regarding open air plaza/concerts, etc.

BUILDING APPEARANCE

1. We request no roof top signage on new building

NOTICE

1. Cheviot Hills Homeowners Association should receive notification of all hearings/meetings related to all aspects of the project.

PARKING/TRANSPORTATION

1. How many parking spaces are assigned to existing buildings? How many new spaces will be added for new project? On Site vs. Offsite? Where is offsite parking located? What method of transporting people between offsite parking and project will be used?
2. What is valet parking and how will it be used in new project? Who uses it and for what?
  - a. Where will valets park "valeted cars?"
3. What does the term "Upgraded Transportation" mean in the Trammell Crow brochure? Must be defined in EIR.
4. All emergency services (fire, police) shall be studied and analyzed during EIR process.

FINAL ISSUES

1. You will receive a letter from Gaines and Stacey, our counsel of record. Any letter submitted by said law firm should be construed as a response to Notice of Preparation by our Association and included with these remarks.
  - a. What is timeline for project completion?
2. We request a development agreement with CHHA before final sign off.
3. EIR must address all cumulative impacts of other projects in Century City.



January 14, 2002

Maya Zaitzevsky  
Los Angeles Department of City Planning  
200 N Spring St, Room 763  
Los Angeles, CA 90012

Dear Maya:

I live in 2170 Century Park East and have for several years. I am not happy with the impending project at 2000 Ave of the Stars. I am really upset that an office building next to the shopping mall and behind the Century Plaza Hotel already was approved and placed into construction mode.

This entire area cannot justify anymore traffic and congestion then is here now. I can not even get out of my driveway in the morning as it is and it takes fifteen minutes just to go 3 blocks in the morning rush hours and the evening rush hours which now are between seven and ten in the morning and three in the afternoon to almost eight o'clock at night. Are you trying to make us prisoners in our homes subject to dirt, construction noise, dust, mud, asbestos flying in the air and traffic beyond our wildest imaginations while you sit fat and happy planning dept. because all you care about is progress and money payoff from large corporations and developers who only care about the money per square foot they are going to collect on the other side of this project. Who in the hell wants to live or work in an area where you can't get in or out.

It is about time you thought out the ingress and egress problems that all the homeowners in the area are subjected to and started really planning for the future that Makes Sense. You can't possibly put in more offices when you don't have the parking really needed for it and you are overcrowding everything else. Don't you understand the need for Open Spaces and PARK LIKE grounds in between everything else? What about Density Factors? I can't even fathom that this could get by in a time when there are vacancy factors all over the place, and the only thing that works now is the Greed factor. No one has any common sense anymore. How about you? Do you have the guts to stand up for us homeowners in reality and see that this entire project is detrimental to the neighborhood? **TOO MUCH TRAFFIC AND**

TOO MUCH NOISE - TOO MUCH DIRT AND DUST - TOO MANY TRUCKS - TOO MANY PEOPLE - CROWDED AND CONGESTED ROADWAYS. I desire to live in a peaceful beautiful location where someone has done some thinking about density and layout. You are turning this one great location into a nightmare for those who live here.

We just went thru the Dept. of Water and Power tearing up streets and laying pipes that took a year and what a mess that was. When does it stop?

You say that nothing will stand in the way of progress and development; however, you must USE YOUR HEADS WHEN IT COMES TO ENVIRONMENTALLY SOUND AND SAFE PROJECTS. YOU ARE ABOUT TO CREATE ONE MONSTROUS TRAFFIC JAM AND I DON'T WANT TO LIVE THIS WAY IN THIS HIGH PROFILE AREA. WHAT ARE YOU ALL DOING DOWN THERE WITH TAXPAYER MONEY?

Please think over this entire project. Unfortunately this is the first I was even made aware of it. I would have written much sooner than this if I had known about it.

Sincerely,

Melinda York  
2170 Century Park East, #511  
Los Angeles, CA 90067  
310-788-0606



**Los Angeles / Orange Counties  
Building and Construction  
Trades Council**

**RICHARD N. SLAWSON**  
Executive Secretary

*Affiliated with the Building & Construction Trades Dept., AFL-CIO*

1626 Beverly Boulevard  
Los Angeles, CA 90026-5784  
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Fax (213) 483-4419



January 15, 2002

Maya Zaitzevsky  
Project Coordinator  
City Planning Department  
200 North Spring Street  
Room 763  
Los Angeles, California 90012

**RECEIVED**  
CITY OF LOS ANGELES

JAN 18 2002

ENVIRONMENTAL  
UNIT

Dear Ms. Zaitzevsky:

I am writing on behalf of the Los Angeles/Orange Counties Building and Construction Trades Council representing more than 14 trades and 130,000 union members.

The proposed 2000 Avenue of the Stars project could not have come at a better time for the construction trades. As we all know, we are currently experiencing a serious economic slowdown in our region, with few major projects in the pipeline. As a result, the 2000 Avenue of the Stars project becomes extremely important to the men and women who work in the building trades and who depend on projects like this for the support of their families.

Construction of this single project will create approximately 1,300 quality union jobs. Those jobs, combined with other direct and indirect impacts associated with the project's development, will result in nearly \$440 million in total economic output.

We look forward to reviewing the Draft Environmental Impact Report that will be prepared on this project, and on behalf of all our union members, I offer wholehearted support of the proposed 2000 Avenue of the Stars project.

Thank you,

Richard Slawson  
Executive Secretary

cc: Honorable Jack Weiss  
Tim, McOsker, Chief of Staff, Office of the Mayor

RS:ah  
opeiu#537/aff-cio

January 10, 2002

Ms. Maya Zaitzevsky  
 Project Coordinator  
 Los Angeles City Planning  
 200 North Spring Street, Room 763  
 Los Angeles, CA 90012

RECEIVED  
 CITY OF LOS ANGELES

JAN 16 2002

ENVIRONMENTAL  
 UNIT

Dear Ms. Zaitzevsky:

As a resident of Century City, it is with regret I read about Trammell Crow's intention to replace the Schubert Theater, movie theaters and retail stores at the ABC Entertainment Center with what I consider to be an unimaginative high-rise office development. Part of my reason for moving to this area 1 1/2 years ago was because of the Schubert Theater. I have attended several performances there and enjoyed them greatly. I feel a total removal of the entertainment nature of the site is in effect a lessening or taking of some of my property's value. Everyone I have spoken with, although perhaps not active in voicing an opinion, is not in favor of losing the Schubert Theater.

I am not saying the Schubert needs to stay, but replacing the entertainment element with a courtyard for tent setups and flea market type activities is not an attractive upgrade or of superior service to local residents in my vision.

When I read of the public/private partnerships developing the Disney Concert Hall, subsidies provided by the City of Glendale to support the Alex Theater, etc., etc., the list is long. I cannot help but feel Trammell Crow is pursuing what they know best how to develop and manage; and therefore that which is easy for them in creating value for their owner/client. I feel their approach is not in the best interests of local residents, but a me-too approach to the development of Constellation Place. Who needs another high-rise office complex in Century City? Especially with west side office vacancy rates increasing. I'm not sure I would want to be the anchor tenant stepping forward to endorse this project knowing the opinions of local residents.

Recent critics of the new Kodak Theater point to the theater's size as one negative, saying it eliminates many venues from appearing. I can't help but feel a 1,500 +/- seat theater at the Schubert site would be of great value to both Trammell Crow's overall project and the residents of Century City. But, it would take some imagination, additional time and perhaps exploring some areas not currently comfortable to an office project developer. I recently saw the Ahmanson Theater had a following of 35,000. Would it not be possible to explore Ahmanson West in some type of joint arrangement where the theaters would not compete but compliment each other in venue, sharing this list of avid theater goers? Would Century City businesses and residents not subscribe to season seats if a new, smaller theater were offered? Especially if public/private foundation subsidies enabled ticket prices to be attractive.

I have read some of the arguments for removing the entertainment nature of the ABC Center, primarily related to profitability. For years, even when I did not live in Century City, I could not understand why potential customers of the retail and movie theaters were discouraged from shopping or attending movies by the exorbitantly high parking fees. Only a few years ago were \$1.00 validations offered at the movie theaters- but I fear too little, too late. The parking fee policy created a self-fulfilling prophecy of "retail/movies/restaurants don't work at that site".

Finally, I had to smile amusedly at Trammell's recent survey of residents seeking support for their project. The boxes to check were: strong support, support, want more info. No room to cast doubts via survey cards returned. I guess if I were trying to get the project approved, I would probably attempt to skew the returned survey cards the same way.

Maurice Blanchard  
 Resident of Park Place, Century City

*M. Blanchard*

2112 Century Park Lane #109  
 LA, CA 90067

CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: January 17, 2002

TO: Department of City Planning  
Attn: Maya E. Zaitzevsky

FROM: Fire Department

SUBJECT: Notice of Preparation of an Environmental Impact Report

RECEIVED  
CITY OF LOS ANGELES  
JAN 28 2002  
ENVIRONMENTAL  
UNIT

PROJECT LOCATION

2000 Avenue of the Stars

PROJECT DESCRIPTION

The Trammell Crow Company is proposing to redevelop 9.2 acres of a 14.02 Acre site within Century City, at the southeast corner of Constellation Boulevard and Avenue of the Stars.

The Project site is currently developed with two commercial structures (2020 and 2040 Avenue of the Stars) totaling 678,842 square feet of office space, retail space, live theater, a multiplex cinema, restaurants, and a health club. The proposed project includes demolition of the two structures and construction of a new 768,897 commercial office building. The two existing Century Plaza Towers would remain unchanged.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 12,000 G.P.M. from any block hydrants flowing simultaneously.

B. Response Distance

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 92  
10556 W. Pico Boulevard  
Los Angeles, CA 90064  
Task Force Truck and Engine Company  
Paramedic Supervisor  
Staff – 11  
Miles – 1.3

Fire Station No. 58  
1556 S. Robertson Boulevard  
Los Angeles, CA 90035  
Task Force Truck and Engine Company  
Staff – 10  
Miles – 2.1

Fire Station No. 37  
1090 Veteran Avenue  
Los Angeles, CA 90024  
Task Force Truck and Engine Company  
Paramedic Rescue Ambulance  
Battalion 9 Headquarters  
Staff – 13  
Miles – 2.3

The above distances were computed to 2000 Avenue of the Stars.

Based on these criteria (response distance from existing fire stations), fire protection would be considered adequate.

C. Firefighting Access, Apparatus, and Personnel.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

Standard cut-corners will be used on all turns.

During demolition, the Fire Department access will remain clear and unobstructed.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

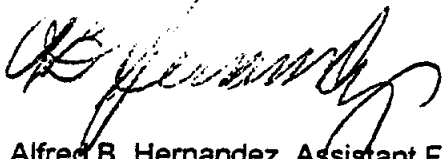
Maya E. Zaitzevsky  
January 17, 2002  
Page 4

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Joseph Jackson of the Construction Services Unit at (213) 485-5964.

WILLIAM R. BAMATTRE  
Fire Chief



Alfred B. Hernandez, Assistant Fire Marshal  
Bureau of Fire Prevention and Public Safety

ABH:JFJ:amz  
c:Notice of Prep EIR





Maya E. Zaitzevsky

1.

1/18/02

Dear Ms. Zaitzevsky:

RECEIVED  
CITY OF LOS ANGELES

JAN 22 2002

ENVIRONMENTAL  
UNIT

Re: 2000 -Avenue of the Stars Public Scoping Meeting

As a 36 year resident of 2170 CenturyPark East and former Vice Pres. of the Board of CP&G, I believe the proposed high-rise office development by Trammel Crow Co. to be a potential environmental disaster for 2160-2170 CPE buildings and our approx. 1400 residents and employees as I indicated when I spoke briefly at the 1/14 Public Scoping Meeting.

My concerns are many and very serious. They include amongst others:

#### AIR QUALITY

The demolition of the buildings poses a major health hazard to our residents including many elderly. Please see the attached re health hazards in NYC as the result of asbestos and other toxic materials being released in the air. I was V.P. when asbestos had to be removed from our buildings and the residents required to evacuate for at least a week. The wind may well blow directly over our buildings.

#### CULTURAL RESOURCES

The loss of the Shubert Theater and Loews movie theaters which are major recreational facilities for our community to be replaced by a cultural center of unknown uses would be a major loss. Also lost would be the many small inexpensive restaurants used by hundreds of people to be replaced by an expensive, unaffordable destination restaurant.

#### HAZARDS AND HAZARDOUS MATERIALS

Large construction equipment and steel blockages.

#### NOISE

The unbearable noise level which accompanies demolition and construction over a period of 2-4 years within close hearing by our residents whose relaxation, sleep and nervous systems could not be tolerated by many people and would force them to move out of their homes in CPE.

#### HOUSING

The value of our buildings in excess of 250 million dollars would be greatly diminished by the noise and other environmental problems and would greatly reduce the value of our condos and rental values for an extended period and be a major financial burden for our residents many of whom are retired or work for moderate salaries with a large portion of their assets represented by their investments here.

#### TRANSPORTATION AND TRAFFIC

An obvious increase in rush hour traffic along CPE and Olympic with increased noise and air pollution already at burdensome levels. The possible use of CPE in front of our buildings for worker parking.

The difficulty of entering and exiting our buildings which can only be accessed thru CPE which is already hazardous because of oncoming traffic. The difficulty of crossing Olympic and CPE with a number of deaths of elderly people in recent years.

I would be glad to talk or meet with you at any time regarding my opinions and the opinions of many residents who ask me for advice as a result of my years of service to the buildings. As I indicated at the meeting I believe this project is slated to go ahead rapidly because of the large amount of money involved.

Respectfully Yours

Richard A. Botwin  
B.A. Brooklyn College  
M.B.A The Wharton School, U. of PA.  
Former Exec. V.P. Starwood Corp; N.Y.C.

*Richard A. Botwin*  
*cc: CPE Board of Directors*

Los Angeles Times  
**latimes.com.**



<http://www.latimes.com/news/printedition/la-000004687jan18.story>

RESPONSE TO TERROR

## N.Y. Air's Purity a Matter of Dispute

**Health: Many believe EPA was too quick to call it safe, and cite indoor pollutants.**

By JOSH GETLIN  
TIMES STAFF WRITER

January 18 2002

NEW YORK -- As New Yorkers choked and gagged under a cloud of smoky dust after the World Trade Center attacks, the Environmental Protection Agency constantly assured them that the air did not pose a major health risk.

"EPA is greatly relieved to learn that there appears to be no significant levels of asbestos in the air in New York City," said Administrator Christie Whitman in a Sept. 13 message repeated many times.

But now, amid growing scientific evidence of high asbestos levels in homes and other potentially air quality problems related to the attacks, many New Yorkers believe the EPA misled them and was perhaps too eager to promote the return to business as usual in lower Manhattan. "The assurances we got from the EPA came from ignorance, and we do not want to pay a terrible price in death and sickness down the road," Rep. Jerrold Nadler (D-New York) said Thursday, joining federal, state and local officials in a call for the EPA to clean up contaminants inside New York homes and businesses.

"Federal officials have only tested the air outside," he added. "They couldn't possibly know if the city is really safe now."

It was the latest outburst in an escalating debate over New York's environmental health after Sept. 11. EPA officials deny they have overlooked health needs, and in a statement Thursday the agency said it has used "sound science" to chart the problem and "has undertaken an unprecedented response to the terrorist attack on the World Trade Center."

Yet the criticism mounts.

Ever since the fires and smoke at the trade center site disappeared, there has been less concern over outdoor air quality and an increasing focus on indoor contaminants. The agency's independent ombudsman has called for a probe of Whitman's reassuring statements about air quality. And a senior EPA chemist has charged that asbestos levels in New York homes pose a health risk equal to that of Libby, Mont., a mining town so contaminated it has been declared a U.S. Superfund site.

Meanwhile, parents are rebelling against Board of Education orders to return their children in three weeks to public elementary schools near ground zero, saying they won't go back until they are convinced the air is safe.

An unprecedented study has been launched to test pregnant women who were exposed to the clouds of gas and smoke at the World Trade Center, and health testing has also begun for hundreds of day laborers who have been working at the site without adequate respiratory protection.

While there is no hard scientific evidence that New Yorkers are in danger from contamination, many observers say federal officials failed to properly communicate the level of medical risk to the city.

"All along, the EPA and other departments have been assuring people in New York City that things were fine, but things were not fine," said Dr. Stephen Levin, medical director of Mount Sinai Hospital's Center for Occupational and Environmental Medicine. "There was a great desire to resume business as usual here, and I do mean business, because there's a great push to commercially redevelop the [World Trade Center] site."

Much of the controversy has focused on asbestos testing. When the World Trade Center towers collapsed, a large but still undetermined amount of asbestos used in the original building construction rained down on Manhattan. The site was only partially lined with the cancer-causing fireproofing material, because New York outlawed its use in 1971 while the buildings were under construction.

Many experts believe that the force of the airplane blast pulverized the asbestos into particles smaller than those normally identified by detection equipment. And while rigorous EPA tests suggest the outside air at the site is free of dangerous contamination, several private studies using more sophisticated technology have shown higher levels of asbestos and other contaminants in the smaller dust particles that blew into homes and offices near the World Trade Center.

The tests, by HP Environmental Inc. of Herndon, Va., and Chatfield Technical Consulting, a Canadian firm, could not determine whether those exposed to the minute particles would develop any potentially fatal diseases. Typically, individuals must be exposed to asbestos for long periods of time, and the disease may not appear for 20 years or more.

"We found conditions that EPA inspectors may not have suspected," said Hugh Granger, who directed the HP Environmental study. "And we don't want to alarm people, but this kind of information should be widely known."

Under EPA guidelines, 70 fibers of asbestos per square millimeter calls for decontamination procedures in schools. In the HP study, several indoor samples showed more than 300 fibers per square millimeter.

EPA officials have said they do not regulate the interior of people's homes, and that the responsibility for enforcing such cleanup rests mainly with the city's health department. But the health department has come under heavy fire for advising people to clean up potentially dangerous particles of airborne asbestos with wet rags, mops and other crude home equipment, instead of the costly and more effective vacuums used at other sites.

Amid the debate, Levin and other experts urge calm. While he said there had been an "unexpectedly high" number of respiratory complaints from New Yorkers, especially among office workers and people who lived near the site, he believes health dangers are greatly abating.

"The fires at the site are out and the risks are diminishing," he told parents from Public School 150 at a

meeting this week to decide whether they should return to the school, six blocks from the World Trade Center site. The school and several others were evacuated after the attacks.

Levin pointed to recent air quality tests at the school, indicating that levels of asbestos, lead and other contaminants did not pose a danger to students. Given all the information that is now available, he said he would not have a problem sending his children back to school near the disaster site.

Yet some parents were not convinced and asked pointed questions: Is there an air quality problem caused by trucks filled with trade center debris that rumble past the school? Is it safe for youngsters to play outside for 45 minutes at recess so close to the site? And what about the contaminated dust particles that may be tracked into the school by children playing outside?

By the end of the meeting, parents were still wrestling with the question, but they clearly resented the Board of Education's edict that their children and students of other schools had to return to their original campuses by Feb. 4. Earlier, parents at nearby Public School 89, citing health concerns, voted against returning.

"You just don't know who to believe in the government anymore," said one angry mother, preparing to leave the meeting in the cafeteria of the Greenwich Village school where Public School 150 students have been temporarily housed since the attacks. "I don't think federal people told us the truth."

Those concerns prompted Robert J. Martin, the EPA's national ombudsman, to call for an inquiry into Whitman's assurances about air quality. Martin, who has called for 35 investigations into EPA actions over the years, is waging a court battle against Whitman's effort to dissolve his job at the agency.

"We felt there was something rotten in Denmark," said Hugh Kauffman, Martin's chief investigator. "I don't want anyone to be scared [about asbestos levels], but we need to find out what exactly she [Whitman] knew when she made these comments, and how forthcoming the agency was."

Yet another charge has been lodged by Cate Jenkins, an EPA chemist, who has performed a risk assessment study of reported asbestos levels in New York homes, and found the city has a level comparable to that of Libby, Mont., where hundreds of people died of asbestos poisoning from nearby mines.

She cautioned, however, that her analogy to Libby is a projection. It is not based on epidemiological studies, which rely on medical histories to chart the onset of diseases and the conditions that caused them.

"If EPA doesn't call for uniform, proper cleanups in these Manhattan homes, the risks will be very high down the line for people," she said.

Elsewhere, researchers at Columbia University's School of Public Health and the Mount Sinai School of Medicine are launching a study that will track the effect of the terrorist attacks on 300 pregnant women. They want to know what chemicals and metals these individuals were exposed to, and whether they contribute to any health problems in the mothers or their children.

David Newman, an industrial hygienist with the New York Coalition on Occupational Safety and Health, said, "We need to make it clear that not everybody will get ill in New York or has been exposed to something bad.

"But people get concerned, sometimes to the point of hysteria, if we don't have a coordinated

governmental response to the problem and what people should do. In New York, that's been sorely missing."

*If you want other stories on this topic, search the Archives at [latimes.com/archives](http://latimes.com/archives). For information about reprinting this article, go to [www.lats.com/rights](http://www.lats.com/rights).*

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Mr. Mrs. Barton Wolin  
2160 Century Park East, #1111  
Los Angeles, CA 90067  
(310) 284-8483

Ms. Maya Zaitzevsky  
Project Coordinator  
Environmental Review Section  
LA Department of City Planning  
200 N. Spring Street, Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 18 2002

ENVIRONMENTAL  
UNIT

Subject: 2000 Avenue of the Stars  
ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

Things are constantly changing in our community and environment. The ABC Entertainment Center is no longer a viable office project that will attract top-notch tenants to Century City. Trammell Crow is proposing an exciting new project that will re-invigorate this property and benefit the surrounding community.

My wife and I live very close to the project and are highly impacted by anything that happens on the property. I support the proposed project because I am concerned about the economic impacts of having a run-down and outdated property in the center of Century City. I do hope that you will study the aesthetic effects that the proposed new landscaped plaza and creative architecture will bring to the community.

In addition, I urge you to keep the comment period brief, as an EIR is not really required and a mitigated negative declaration was already prepared.

Sincerely,

*Justin Wolin*  
*Barton*

Cc: Councilmember Jack Weiss

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
120 SO. SPRING ST.  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337



**RECEIVED**  
CITY OF LOS ANGELES

JAN 23 2002

ENVIRONMENTAL  
UNIT

*Flex your power!  
Be energy efficient!*

Ms. Maya Zaytzevsky  
Los Angeles City Planning Department  
200 N. Spring St.  
Los Angeles, CA. 90012

RE: IGR/CEQA# 020138NY  
Notice of Preparation  
2000 Avenue of the Stars  
SCH#2002011024  
LA/405,2/30.86,5.58

January 18, 2002

Dear Ms. Zaytzevsky:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed 2000 Avenue of the Stars project in the City of Los Angeles.

Based on the information received, and to assist us in our efforts to completely evaluate and assess the impacts of this project on the State Transportation System, a traffic study in advance of the DEIR should be prepared to analyze the following information:

1. Assumptions and methods used to develop trip generation/distribution, percentages and assignments.
2. An analysis of ADT, AM, and PM peak-hour volumes for both the existing and future conditions. This should include Freeway 405, State Route 2 crossroads, and controlling intersections.
3. This analysis should include project traffic, cumulative traffic generated for all approved developments in the area, Interchange Utilization (I.C.U.) and Level of Service (LOS) of affected freeway ramp intersections on the State Highway indicating existing + project(s) + other projects LOS (existing and future).



Ms. Zaitzevsky

January 18, 2002

4. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - o financing
  - o scheduling considerations
  - o implementation responsibilities
  - o monitoring plan
  
5. Developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer should be addressed. Any assessment fees for mitigation should be of such proportion as to cover mainline highway deficiencies that occur as a result of the additional traffic generated by the project.

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

Stephen Buswell  
IGR/CEQA Branch Chief  
Caltrans District 07  
Regional Transportation Planning  
120 S. Spring St., Los Angeles, CA 90012

If you have any questions, please call Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 020138NY.

Sincerely,



STEPHEN J. BUSWELL  
IGR/CEQA Branch Chief  
Transportation Planning Office

January 22, 2002

RE: 2000 Avenue of the Stars  
ENV-2001-4027-CU

REC - VE  
CITY

JAN 28 2002

ENVIRONMENTAL  
UNIT

Dear Maya,

We are sorry we couldn't stay at the scoping meeting on Monday, Jan. 14th to hear what the opposition had to say.

We are not concerned about more traffic (it seems be a way of life in Los Angeles), but we hope the builders would give serious thought for a smaller theater (perhaps 350 seats) to replace the Shubert Theater. Audiences need a more intimate setting to feel a part of the production that's being performed on stage.

A cultural center was mentioned - we hope not another museum.

Century City is probably identifiable from any direction in Los Angeles and, we believe, the beautiful 15-story office building will enhance the scene. Kudos to the architects.

We are anxious to hear what restaurants and retail stores will be occupying the spaces. Looking forward to the next meeting.

Sincerely,

Esther Rubin

Matthew Rubin

*via  
e-mail*

From: Art Meza [artmeza00@yahoo.com]  
Sent: Thursday, January 31, 2002 2:40 PM  
To: weiss@citycouncil.lacity.org  
Subject: 2000 Avenue of the Stars

**Arturo Meza**

10340 Bellwood, #238  
Los Angeles, CA 90064

January 31, 2002

Mava Zaitzevsky

City Planning Associate

Los Angeles Department of Planning

200 N. Spring Street, Room 763

Los Angeles, CA 90012

Reference: 2000 Avenue of the Stars

ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

This letter is sent in regard to the project proposed to replace the ABC Entertainment Center in Century City. It is my understanding that you are accepting suggestions regarding the scope of study to be included in the Environmental Impact Report.

As a musician, I am especially interested in the cultural facility the developer is planning to include. I believe that this kind of amenity would be of great benefit to the community and would like to see what the EIR will have to say about the programs it might include and its viability as part of the overall project.

1/31/02

I understand that the EIR process is a lengthy one, which I hope can be expedited in order to get this important new development underway.

Thank you for considering my comments.

Sincerely,

Arturo Meza

cc: Councilman Jack Weiss

DANIEL A. CASE\*  
ARTHUR R. KNOWLSON, JR.\*  
MICHAEL F. WRIGHT  
BARRY A. YOCH\*  
PATRICK WALSH  
DANIEL G. JORDAN  
J. PATRICK FLEMING, JR.  
ARMEN TAMZARIAN  
RONALD S. CASWELL  
AMY A. HOFF  
BERT C. COZART  
STEVEN P. HASKELL

\*A PROFESSIONAL CORPORATION

LAW OFFICES  
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TELECOPIER (310) 552-3229

ORANGE COUNTY OFFICE  
660 NEWPORT CENTER DRIVE  
SUITE 570  
NEWPORT BEACH, CA 92660  
TELEPHONE (949) 728-0700  
TELECOPIER (949) 728-0728

OF COUNSEL  
EDWIN I. LASMAN\*  
DAVID M. LUBER  
MICHAEL NICKOK  
MARK H. EASTMAN

January 22, 2002

Ms. Maya Zaitzevsky  
Project Coordinator  
200 North Spring Street  
Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 23 2002

ENVIRONMENTAL  
UNIT

Re: 2000 Avenue of the Stars; EAF No. ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

I attended the public scoping meeting this week regarding the above-referenced project, but unfortunately my speaker card was not called as of 7:30 p.m. when I had to leave for a prior appointment. Accordingly, I am submitting my comments in writing.

I have been a tenant in the Century Plaza Towers for 15 years, first from 1976 through 1986, and most recently since 1997. For the last 20 years, I have also been a neighbor of the Century City community, living approximately one mile from the project (near the intersection of Wilshire Boulevard and Beverly Glen).

The sad truth is that the retail area of the ABC Entertainment Center does not work and is in dire need of replacement. It is cold, drafty, dark and uninviting. Given its poor design, it was functionally obsolete virtually from the day it opened. It is no wonder why few retail tenants have found any economic success at this location. Unfortunately, the people who suffer because of this failure are the office tenants and the nearby residents (like myself) who have little interest in using any of these facilities, either at lunch or in the evening.

I encourage the planning department to look very carefully at the negative environmental impacts to the community if the ABC Entertainment Center is not redeveloped. I see no wisdom in perpetuating an aging and moribund facility because it requires new development. Anti-growth proponents will always oppose change. In this case, however, the redevelopment is

FAFILES\DACCORRESP\Zaitzevsky.ltr

Maya Zaitzevsky  
January 22, 2002  
Page 2

sorely needed. Frankly, I believe that Century City is one of the finest office communities in the United States and that the proposed development is in keeping with these high standards.

Very truly yours,



Daniel A. Case, P.C.  
of CASE, KNOWLSON, JORDAN & WRIGHT LLP

DAC/fr

MARTA FEIGENBAUM  
2160 Century Park East  
LOS ANGELES, CALIFORNIA 90067  
(310) 201-9610

January 23, 2002

Ms. Maya Zaitzevsky  
City Planning Associate  
Los Angeles Department of Planning  
200 N. Spring Street, Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF  
JAN 23 2002  
ENVIRONMENTAL  
UNIT

Reference: 2000 Avenue of the Stars  
ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

As a very near neighbor of the proposed 2000 Avenue of the Stars project, I am very interested in the content of the Environmental Impact Report. I was unable to attend the recent scoping hearing, so I hope you will consider my comments in this letter.

As with any project in a major area of this city, there are naturally concerns about the traffic it will generate. I want to urge that the traffic issue be thoroughly explored in the EIR. It is my understanding that it will not produce more traffic than was generated by the project it replaces. It is important that the EIR determine the accuracy of that claim.

At the same time, I hope that the EIR process will not drag out as is often the case. Century City can use some new architecture to replace the ABC Center, which has gotten pretty tired-looking. The Shubert Theatre is dark so much of the time, and this new complex with its landscaped plaza and cultural facility can be a very exciting addition to the Century City environment. I would like to see it completed and operational in the near future.

I look forward to seeing the results of the EIR, and thank you for considering my comments.

Sincerely,

  
Marta Feigenbaum

cc: Councilman Jack Weiss