

COPY

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ARCHITECT • PLANNING CONSULTANT

04 S. BEVERLY GLEN., SUITE 101, L.A. CALIF. 90064

January 24, 2002

Ms. Maya Zaitzevsky
City Planning Associates
Los Angeles Department of Planning
200 N. Spring Street, Room 783
Los Angeles, CA 90012

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

Dear Ms. Zaitzevsky:

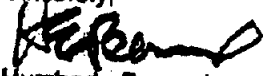
As a resident of the Century City area, and as an architect interested in design, I am writing about the 2000 Avenue of the Stars project currently under consideration by the city.

It is especially the aesthetic aspects of the Environmental Impact Report that concern me. I consider Century City a jewel, an area within Los Angeles that should be treasured and enhanced. I am impressed with the concept the Gensler Group has created and believe it is a magnificent design that will serve the city well.

It is my understanding that a mitigated negative declaration has already been submitted, so I hope that the comment period can be kept brief to allow the process to move along quickly.

I appreciate your consideration.

Sincerely,



Humberto Bermudez
2304 S. Beverly Glen Boulevard, #101
Los Angeles, CA 90064

cc: Councilman Jack Weiss

January 25, 2002

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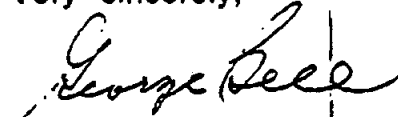
Ms. Maya Zaitzevsky, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, California 90012

Dear Ms. Zaitzevsky:

I am in receipt of your Notice of Preparation regarding the proposal for the development of the property located at 2000 Avenue of the Stars.

I am strongly opposed to further development in Century City. For the last 17 years I have been a resident of this area and have seen my quality of life deteriorate with each passing year. I am against any proposal that will bring additional traffic, additional people, additional noise and more pollution to this already overcrowded community. I am in favor of a NO FURTHER GROWTH policy for Century City.

Very sincerely,



George Bell
2170 Century Park East, #1108
Los Angeles, California 90067

**City of Los Angeles
Inter-Departmental Correspondence**

Date: January 25, 2002

To: Maya Zaitzevsky, City Planning Associate
Los Angeles Department of City Planning

From: *Adel Hagekhalik*
Adel Hagekhalik, Division Manager
Wastewater Engineering Division

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Subject: Sewer services for the proposed 2000 Avenue of the Stars project

This is in response to your January 4, 2002 Pre-draft request for comments letter. Bureau of Sanitation, Wastewater Engineering Services Division, comments on the proposed project and a preliminary evaluation of potential impacts on the wastewater services that were conducted for the proposed site.

Review of the projected flow, the corresponding flow generation factor, wye-maps showing existing sewer lines to the proposed site, and sewer lines capacity indicates the following:

Projected Wastewater Discharges for the Proposed Project

Type Description	Average Daily Flow per Type Description (GPD/Unit)	Amount of Unit per Use	Average Daily Flow (GPD)
Projected Existing Wastewater Generation of the Proposed Project Site			
Commercial Space	100GPD/1,000 SQ.FT.	678,822 SQ.FT.	67,882
Projected Wastewater Generation of the Site During Operations of the Proposed Project			
Office Space	200GPD/1,000 SQ.FT.	719,924 SQ.FT.	143,985
Restaurant	300GPD/1,000 SQ.FT.	30,527 SQ.FT.	9,158
Retail	100GPD/1,000 SQ.FT.	18,318 SQ.FT.	1,832
Cultural	25GPD/1,000 SQ.FT.	10,178 SQ.FT.	254

The City of Los Angeles provides sewer conveyance infrastructure and wastewater treatment services to the proposed project site. The Bureau of Engineering designs and constructs new wastewater facilities. The operational and maintenance elements of the wastewater system are the responsibility of the Bureau of Sanitation, which operates all wastewater collection, treatment and disposal facilities.

The City's wastewater services area consists of two district drainage areas: the Hyperion Service Area (HAS) and the Terminal Island Service Area (TISA). The HAS covers approximately 515 square miles and services the majority of the Los Angeles population.

In addition, the service area includes several non-City agencies that contract with the City for wastewater service. The TISA is approximately 20 square miles and services the Los Angeles Harbor area.

The sewer infrastructure in the vicinity of the proposed project includes existing eight-inch, ten-inch, twelve-inch and fifteen-inch sewer pipes located north east of Avenue of the Stars which all feed into an existing 33-inch concrete sewer in Century Park East. Also, there is a 10-inch sewer pipe located south west of Avenue of the Stars. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant (HTP). Located on a 144-acre site adjacent to the Pacific Ocean in Playa Del Rey, the HTP was upgraded in December of 1998 to provide full secondary treatment with the design maximum flow of 450 million gallons per day (mgd). Currently, the average monthly flow being treated at HTP is approximately 360 mgd.

The necessary permit application and process will still be required when this development gets underway which is processed through the Bureau of Engineering. This office may then conduct a sewer availability study to thoroughly evaluate the additional flow impact to the system concurrent with the Bureau of Engineering permit process and plan check of your proposal. This may necessitate re-gauging of the flow and calculating the capacities of the sewer line of the area, at that time. It would only be then, that a definite answer to your question of adequate sewer capacity could be answered.

If you have any questions, please call Belal Tamimi of my staff at (213) 473-8217.

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California Country Club Homes Association

January 28, 2002

Los Angeles Planning Department
Environmental Review Unit
200 No. Spring Street, Rm. 763
Los Angeles, CA 90012
Attention: Maya Zaitzevsky, City Planning Associate

RE: Case No. ENV 2001-1027-CU
2000 Avenue of the Stars
Trammell Crow Development

Dear Ms. Zaitzevsky:

CALIFORNIA COUNTRY CLUB HOMES ASSOCIATION, a nonprofit corporation, is located in Cheviot Hills, directly South of the above-proposed Century City Trammell Crow project (hereinafter, the "Project"). The major boundaries of our community are Pico Boulevard, Motor Avenue, National Blvd., Club Drive and the 1-10 Freeway On and Off Ramps. Many hundreds of our residents will be the most directly and adversely affected by the detrimental impacts of this overwhelming massive development.

We urge that the Planning Department give our significant concerns priority consideration. Because the hub of the 1-10 Freeway Off Ramp converges with National Boulevard, Palms Avenue, Exposition Boulevard, Manning Avenue, Motor Avenue, and Club Drive and congests the southerly entrance to our community, we are a traffic disaster.

CALIFORNIA COUNTRY CLUB HOMES ASSOCIATION REQUIRES THAT THE FOLLOWING ISSUES BE ADDRESSED AND THAT WE BE ADVISED OF THE STANDARDS UTILIZED FOR YOUR CONCLUSIONS.

TRAFFIC

1. **ANALYZE** the cumulative effect of the increased traffic density from adjacent and surrounding construction and reconstruction projects, such as the Santa Monica Blvd., expansion route, and the Century City proposed expansion of the Shopping Mall, and additional projects scheduled to start in the reasonably near future, all of which will need to divert traffic and impact our community for the period of years required to complete said projects.
2. **STUDY** updating and revision of current traffic systems, such as the APSAC System of traffic lights. Research the latest data of state-of-the art traffic systems

"intelligent traffic" being utilized currently in the United States and elsewhere. Compare long term impacts and benefits on adjacent residential communities.

3. STUDY the alternatives to DECREASE TRAFFIC TRIPS, NOT INCREASE TRAFFIC TRIPS, DURING PEAK AND NON PEAK HOURS, AM AND PM, WEEKENDS, SEASONS, HOLIDAYS, SPECIAL EVENTS AND VIP FUND RAISERS, GIVING CONSIDERATION TO CURRENT TRAFFIC GENERATED BY FOX FILM STUDIOS PHASE II AND PROJECTED INCREASE BY CENTURY CITY SHOPPING MALL AND PENDING FUTURE DEVELOPMENTS. EVALUATE PARKING AND TRANSPORTATION FACILITIES PROPOSED.
4. STUDY what is most effective traffic mitigation enforcement method in current usage or proposed usage in United States and how this system may best protect the quality of life, safety, and environmental hazards of residential living.
5. EVALUATE which mixture of Tenants is best suited for least amount of vehicle traffic, and how less traffic would be generated by innovative methods or work performed at other locations, such as at home, etc.,
6. SPECIFY usage of Helicopter Pad, which must be PROHIBITED except in emergency. Specify permitted hours of usage, flights over residential community, altitude to be maintained, Pilot certification, and qualifications, security, safety, etc., type of Helicopter, age, passengers, history of mechanical checks, etc. Helicopter pad must have prior approval to be qualified for emergency use, as stated.

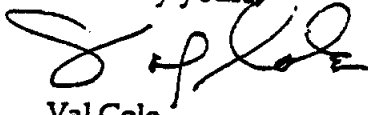
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1. STUDY OF environmental impact on health and safety of community, including children, elderly and infirm. Century City Hospital would be subjected to harmful pollution of toxins and detrimental noise factors during demolition, construction and traffic and haul routes of trucks, as well as subsequent increased traffic density after completion and operation of development, the surrounding community's health would be critically affected (and seriously impaired). Noise contours, etc.
2. ANALYZE population growth, new population influx, overburdened infra structure and public services projected long term, including Public utilities. Probability of increased tax assessment or bond issues to defray increased costs of improving or repairing infra structure, etc., potential increase of crime factor.
3. EVALUATE THE COST BASIS VS THE BENEFITS OF DOWN SIZING THE TRAMMELL CROW PROPOSED PROJECT. The long-term negative environmental impacts on residential living, working, school, livelihood, church, quality of life, education, of property values, increase of stress and health factor. Increased security essential, with increased police and fire special services.

4. **STUDY HAUL ROUTES FOR DEMOLITION AND CONSTRUCTION.**
Provisions to be made for safe asbestos removal. **COMMUNITY MUST APPROVE TIME and ROUTE. COMMUNITY "CCCHA" MUST HAVE SUFFICIENT ADVANCE NOTICE.**

We hereby incorporate by this reference all comments that have been made in support of our concerns and which have previously been submitted to your department, including with specificity those of Cheviot Hills Home Owners Association and Tract 7260.

Sincerely yours



Val Cole
Chairman of the Board
California Country Club Homes Association

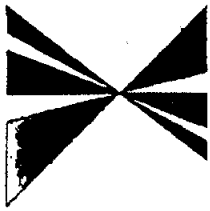
Please reply to:

3246 Barbydell Drive
Los Angeles, CA 90064

NOTICE: California Country Club Homes Association requests advance written notification of all hearings and meetings respecting all aspects of the Project.

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SOUTHERN CALIFORNIA



ASSOCIATION OF
GOVERNMENTS

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Scotts, Santa Valley • Denise De Telle, San
Tara • Paul Young, Port Pinnac

County Transportation Commission
Jim Harris

Western County Transportation Commission:
Bill Davis, Santa Valley

January 28, 2002

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

RE: Comments on the Notice of Preparation for a Draft Environmental Impact Report
for 2000 Avenue of the Stars, Century City – SCAG No. 1 20020001

Dear Ms. Zaitzevsky:

Thank you for submitting the Notice of Preparation for a Draft Environmental Impact
Report for 2000 Avenue of the Stars, Century City to SCAG for review and comment. As
areawide clearinghouse for regionally significant projects, SCAG reviews the consistency
of local plans, projects, and programs with regional plans. This activity is based on
SCAG's responsibilities as a regional planning organization pursuant to state and federal
laws and regulations. Guidance provided by these reviews is intended to assist local
agencies and project sponsors to take actions that contribute to the attainment of regional
goals and policies.

We have reviewed the aforementioned Notice of Preparation, and have determined that the
proposed Project is regionally significant per California Environmental Quality Act (CEQA)
Guidelines (Section 15206). The proposed Project considers the construction of commercial
office space encompassing more than 250,000 square feet of floor space. CEQA requires that
EIRs discuss any inconsistencies between the proposed project and applicable general plans
and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and
rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation
Plan, which may be applicable to your project, are outlined in the attachment. We expect the
Draft EIR to specifically cite the appropriate SCAG policies and address the manner in
which the Project is consistent with applicable core policies or supportive of applicable
ancillary policies. Please use our policy numbers to refer to them in your Draft EIR.
Also, we would encourage you to use a side-by-side comparison of SCAG policies with
a discussion of the consistency or support of the policy with the Proposed Project.

Please provide a minimum of 45 days for SCAG to review the Draft EIR when this document is
available. If you have any questions regarding the attached comments, please contact me at
(213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

January 28, 2002
 Ms. Maya Zaitzevsky
 Page 2

**COMMENTS ON THE PROPOSAL TO DEVELOP A
 DRAFT ENVIRONMENTAL IMPACT REPORT
 FOR
 2000 AVENUE OF THE STARS, CENTURY CITY
 SCAG NO. I 20020001**

PROJECT DESCRIPTION

The proposed Project considers a Conditional Use Permit to permit the demolition of existing commercial and office uses, and construct a 15 story building with 778,947 square feet of commercial/office uses. The proposed Project is located 2000 Avenue of the Stars, Century City, City of Los Angeles.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for 2000 Avenue of the Stars.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The Draft EIR should reflect the most current SCAG forecasts which are the 2001 RTP (April 2001) Population, Household and Employment forecasts for the Los Angeles City subregion and the City of Los Angeles. These forecasts are as follows:

LA City Subregion Forecasts	2000	2005	2010	2015	2020
Population	3,823,062	4,030,730	4,210,853	4,387,980	4,628,339
Households	1,276,318	1,323,238	1,417,670	1,513,052	1,632,598
Employment	1,782,153	1,855,350	1,931,000	1,975,730	2,016,625

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**City of
 Los Angeles**

Forecasts	2000	2005	2010	2015	2020
Population	3,786,249	3,990,078	4,164,602	4,336,220	4,569,103
Households	1,266,767	1,312,808	1,405,494	1,499,494	1,616,450
Employment	1,760,085	1,831,669	1,905,648	1,949,391	1,989,380

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

The **Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators:

Mobility - *Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.*

- *Average Work Trip Travel Time in Minutes – 25 minutes (Auto)*
- *PM Peak Freeway Travel Speed – 45 minutes (Transit)*
- *PM Peak Non-Freeway Travel Speed*
- *Percent of PM Peak Travel in Delay (Fwy)*
- *Percent of PM Peak Travel in Delay (Non-Fwy)*

Accessibility - *Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- *Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)*
- *Average transit access time*

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Environment - Transportation system should sustain development and preservation of the existing system and the environment. (All Trips)

- CO, ROG, NOx, PM10, PM2.5 – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements

Reliability – Transportation system should have reasonable and dependable levels of service by mode. (All Trips)

- Transit – 63%
- Highway – 76%

Safety - Transportation systems should provide minimal accident, death and injury. (All Trips)

- Fatalities Per Million Passenger Miles – 0
- Injury Accidents – 0

Equity/Environmental Justice - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)

- By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles

Cost-Effectiveness - Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety

- Return on Total Investment – Optimize return on Transportation Investments

4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.

4.04 Transportation Control Measures shall be a priority.

4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

January 28, 2002
Ms. Maya Zaitzevsky
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- 3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*
- 3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*
- 3.18 *Encourage planned development in locations least likely to cause environmental impact.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

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Ms. Maya Zaitzevsky
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- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter core actions related to the proposed project includes:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

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Ms. Maya Zaitzevsky
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WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

CONCLUSIONS

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

January 28, 2002
Ms. Maya Zeitzevsky
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SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. 134, 49 U.S.C. 5301 et seq., 23 C.F.R. 450, and 49 C.F.R. 813. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. 7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity of Projects, Plans and Programs* to the State Implementation Plan, pursuant to 42 U.S.C. 7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21063 and 21067, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. 1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

BORDED MEMBERS
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LUB & BLOCH LLP

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Tobias Lurie

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Joanna Szabo
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Robert Berling
Jim Everett
ITACHI, LTD.
Suzuki

CENTURY PLAZA TOWER
"HATHICROW COMPANY"
James R. Darley
Chairman of the Board

CENTURY CITY CHAMBER
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James D. Lynch
President/CEO

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& Co. LLP
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HOWARD & ZILCH
Dennis Moore

JENKINS & GILCHRIST
Jeffrey C. Freedman, Esq
Isa' Siegel, Esq.
JMS REALTY COMPANY PROPERTIES
Stuart C. Nathan

JONES LANG LASALLE INC /
FOX PLAZA
Glen Berryhill
KATTEN MUTHEN & ZAVI
Kathryn Gopher

KAUFMAN, BELMONT, COERMAN,
TINOU & MILLER
Michael Thompson
KRIZBA CORPORATION
Chris Cozley

LES SHAPIRO, CPA'S
Jeffrey B. Engler
LIFETIME TELEVISION
Marlann Harris

MELION 1ST BUSINESS BANK
Ken Barabancouk
MERCANTILE NATIONAL BANK
Muna Bell

MERRILL LYNCH
Danae Thomas
MICREYSHOWA & ASSOCIATES
Jeffrey A. Seymour

NORTHROP GRUMMAN CORPORATION
Harris Sperling
OCHOA CONSTRUCTION
Catherine Shelton

ONSOURCE
G.A. "Coby" Juhn III
PACIFIC BELL
Susan Harris

PARK HYATT LOS ANGELES
Cormac O'Moidehra
PICHEL, MICHELS & MYERS
James L. Brax

THE POLLACK PR MARKETING GROUP
Seifer Pollack
PRICEDWATERHOUSECOOPERS LLP
Kenneth M. Ram

PROBAUB ROSS LLP
David R. Schelderman
SANIBLO & BADOE, CPA'S
Jenny Joseph

SEMPA ENERGY
FACILITY MANAGEMENT
Larry J. Engel
John King

SHAWNEE THEATRE
Mark Nichols
THE ST. REGIS LOS ANGELES
Arash Azarbarzin

STRAIGHT CHILDREN'S FOUNDATION
John Moschler, Jr.
SUNAVENCA, INC.
Bonita Kuzman

TERRA PACIFIC REAL
ESTATE SERVICES INC.
Scott Calcatera
TIFFANY & Co.
Jonathan Br. dimer

TOPA MANAGEMENT CO.
Brad Glaeger
UBS PARSHEWISER
Sandra Moizer
Maryann Kelly
Mary Wilks

UNION BANK OF CALIFORNIA
Donald Hance
UNIVERSAL PROTECTION SERVICE
Steve Jones
VALINS, ROSE & PIGARANI
Arlen R. Gussner, Esq.
WEST L.A.P.D.
Capt. Richard Wemmer
WESTBOLING CAPITAL
MANAGEMENT, LLC
Craig O. Bailey



January 29, 2002

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

Re: 2000 Avenue of the Stars Project - ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

As the President & CEO of the Century City Chamber of Commerce, I wish to express my personal support for this much-needed high quality replacement project. The Chamber's mission is to promote, support, and advocate the interests of the business community. Renovation of the outdated and dysfunctional ABC Entertainment Center is of obvious importance and value to the future economic vitality of the Century City community.

The proposed 2000 Avenue of the Stars project will be instrumental in retaining and advancing quality business activity in Century City. This superior quality project will create a new and vibrant synergy by attracting premiere firms looking for Class A office space in Century City.

Because this is a replacement project that will include a different tenant mix than before, and not a new development, it is my understanding that there will be no significant traffic impacts. However, I would ask that the EIR carefully study the traffic impacts of this replacement project in comparison to those that existed at the ABC Entertainment Center when it was fully leased and operational.

Of greater concern should be the clear danger of vacancies and continued small business failures that will likely result from a "no new project" scenario, and the ensuing negative economic effect should be thoroughly considered in the EIR.

Revitalization is necessary and inevitable if we wish to maintain a vibrant economy that benefits both our local residential and business communities. The proposed 2000 Avenue of the Stars project is innovative, well planned and will be significantly beneficial to the future prosperity of Century City.

Sincerely,

James D. Lynch
President & CEO

cc: Los Angeles City Councilmember Jack Weiss

John C. Atkinson
1836 Glendon Avenue
Los Angeles, California (90025)
310-446-8489

January 30, 2002

Maya 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

VIA MAIL and FACSIMILE (213-978-1343)

Dear Ms. Zaitzevsky:

The scoping meeting held on January 14 was very enlightening. I appreciated the opportunity to speak and would also like to communicate my interests in writing.

With respect to the scope of the EIR, I am especially interested in two issues: aesthetics and energy efficiency. Because I live within walking distance of the ABC Entertainment Center, I am conscious of the buildings' close proximity to the street. It appears to me that the new complex, being set back an additional 30 feet, will be far more aesthetically appealing. With respect to energy efficiency, it is of interest to me that the 2000 Avenue of the Stars complex is expected to be 38 percent more energy-efficient. Especially at this time when we need to reduce our dependence on foreign oil, I am in favor of projects such as this that can help accomplish that goal. I trust that the EIR will explore both of these issues, and I will be interested in the outcome.

It is my understanding that some study of these issues has been accomplished under the terms of the Mitigated Negative Declaration. In light of that fact, I hope that the EIR process can be expedited, so that construction of the project can get underway.

Thank you for considering my comments.

Sincerely,


John Atkinson

cc: Councilman Jack Weiss

Michael R. A. Wade
Apartment 902
2170 Century Park East
Los Angeles, California 90067

TEL: (310) 556-8091

FAX: (310) 556-3088

E-MAIL: CHINA-TRADE@worldnet.att.net

Ms. MAYA ZAITZEVSKY
City Planning Associate
Environmental Review Section
Los Angeles Department of City Planning
Room 763
200 North Spring Street
Los Angeles, California 90012

2 PAGES

FAX: 1-213-978-1343

E-MAIL: mzaitzev@planning.lacity.org

SUBJECT: 2000 Avenue of the Stars (Case # ENV-2001-4027-CU)

Dear Ms. Zaitzevsky:

Thank you for the opportunity to speak out as a close-by neighbor in support of the 2000 Avenue of the Stars project in Century City. As I explained during your Public Scoping Meeting on January 14th, my wife Carole and I are seventeen-year resident homeowners living within 500 feet of 2000 Avenue of the Stars. We chose to buy and live in Century City because it provides high-rise urban amenities in walking distance from our home. Downtown, by contrast, lacks full-service grocery stores, among other things.

Ms. Zaitzevsky, in your opening remarks on the 14th, you directed all Century City residents to consider specifically the environmental impact of the proposed 2000 Avenue of the Stars project. My wife and I have spent the past couple of weeks walking through our community and talking to our neighbors about your request. It is very clear to all of us that 2000 Avenue of the Stars will have an extremely favorable and positive impact on the environment. The project opens

(MORE)

Ms. MAYA ZAITZEVSKY
January 30, 2002

(PAGE 2)

up street access on the Constellation and Avenue of the Stars corner to a new plaza-park, as well as offering our community easy on-foot access to a new cultural center.

You know, people in Los Angeles deserve the freedom to make residential life-style choices ... and Century City residents are urban dwellers to the core. The 2000 Avenue of the Stars project will enhance our lives.

* * * * *
Ms. Zaitzevsky, during your meeting on the 14th, you and I witnessed an ugly performance by the quasi-professional Century City haters who reside in the nearby neighborhood of Cheviot Hills. I have hiked over to that place ... and it is in Cheviot Hills where our air quality is damaged by deliberate environmental degradation. Almost every house there has a huge filth-generating SUV truck parked beside it – the larger the house, the bigger the SUV truck.

Los Angeles banned certain kinds of furniture spraying equipment and dry cleaning machinery some years ago. Our air freshened up considerably as a result. Now it time for your office – in your position, as an environmental quality review agency – to sanction the Cheviot Hills SUV truck drivers. Thank you for your consideration.

To review: 2000 Avenue of the Stars will benefit the environment in my urban walk-everywhere neighborhood. The SUV truckers hurt us all.



Michael R. A. Wade

Michael R. A. Wade
Apartment 902
2170 Century Park East
Los Angeles, California 90067

TEL: (310) 556-8091

FAX: (310) 556-3088

E-MAIL: CHINA-TRADE@worldnet.att.net

January 30, 2002

Honorable JACK WEISS
Los Angeles City Council
Room 440
200 North Spring Street
Los Angeles, California 90012

2 PAGES

FAX: 1-213-978-2250

E-MAIL: weiss@council.lacity.org

SUBJECT: 2000 Avenue of the Stars: a welcome addition to my neighborhood

Dear Councilman Weiss:

My wife Carole and I are seventeen-year resident homeowners living in Century City within 500 feet of the proposed 2000 Avenue of the Stars project. We chose to buy and live in Century City -- in your own councilmanic district -- because it provides high-rise urban amenities in walking distance from our home. Downtown, by contrast, lacks full-service grocery stores, among other things.

Carole and I recently attended the "Scoping Meeting" organized by the Department of City Planning in connection with the environmental review of 2000 Avenue of the Stars. One of your own staff members was introduced to the audience during that program on January 14th.

Councilman Weiss, my wife and I have spent the past couple of weeks walking through our community and talking to our neighbors about the exciting new project in our midst. It is very clear to all of us that 2000 Avenue of the Stars will have an extremely favorable and positive

(MORE)

Honorable JACK WEISS
January 30, 2002

(PAGE 2)

impact on the environment. The project opens up street access on the Constellation and Avenue of the Stars corner to a new plaza-park, as well as offering our community easy on-foot access to a new cultural center.

You know, people in Los Angeles deserve the freedom to make residential life-style choices ... and Century City residents are urban dwellers to the core. The 2000 Avenue of the Stars project will enhance our lives.

* * * * *

Councilman Weiss, my wife and I overheard a remark made in the back of the room during the meeting on the 14th that we consider to be extremely troubling. Earlier in the program, we had witnessed an ugly performance by the quasi-professional Century City haters who reside in the nearby neighborhood of Cheviot Hills. Afterwards, we heard one of those same women make the statement, "Jack Weiss always votes our way. He's our flunky."

I served in Government in Washington for nine years -- ultimately ending up in the White House under President Nixon. I believe that legislators like you bring honor to us all ... and I am truly disgusted at the unfortunate remark made during the Scoping Meeting.

Century City homeowners like Carole and me want our neighborhood to grow -- aided by fine projects like 2000 Avenue of the Stars -- and we look to you as our elected representative to help our neighborhood thrive. Please reject these negative-thinking outsiders who fervently wish to close our small urban community down. Thank you for your consideration.

Michael Wade

Michael R. A. Wade

COPY

TRACT NO. 7260 ASSOCIATION, INC.

Kerwood Avenue, Los Angeles, CA 90025-6006 Fax or Phone: (310) 277-6505

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CITY OF LOS ANGELES

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ENVIRONMENTAL
UNIT

President
Diane Wick

January 31, 2002

Vice-President
Mike Eveloff

Maya Zaitzevsky
Los Angeles Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

Secretary
Richard S Harmetz

Treasurer
Mark Robbins

Dear Ms. Zaitzevsky:

Board of Directors
Clyde Augustson
Marie Epstein
Michael Eveloff

Because Tract No. 7260 is located adjacent to Century City, the Board of Directors of the Tract No. 7260 Association, Inc., is concerned about the traffic problems that will be created by the proposed Trammell Crow project at 2000 Avenue of the Stars.

Richard S Harmetz
Kurt Herrmann
Irving Hirschfield
Patty Hoffen
Shirley Kiley
Mark Robbins
David Smith

At the most recent public meeting on the scope of the EIR, and at a meeting with our group, the developer described the current building as "virtually dark." They described a building which is dramatically under-used to the extent that it is all but vacant. As a result, the current building at that site, the ABC Entertainment Center, is virtually non-existent as a traffic generator.

Sue Sokol
Hannah K. Solomon
Edward Wahl
C. Z. Wick

The current minimal traffic generated by the current building is essentially related to the theatres within that building. Not only are those theaters poor performers, but the traffic that they do generate does not occur during rush hour times. The proposed structure, which is populated almost exclusively by office space, would dramatically increase the amount of rush hour traffic

Considering the above, Tract 7260 formally requests the following:

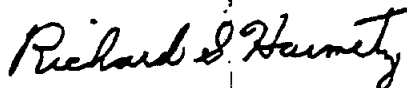
1. That the proposed structure be evaluated as a new development with its associated Trips, rather than a replacement structure considering that the proposed structure trip generation is of a completely different nature, and the existing structure is virtually vacant.
2. That the proposed structure traffic generation be considered in combination with existing already-approved projects and proposed projects. Specifically, we request that the impacts of Constellation Place, Fox Phase 2, the Century City, the Century City Mall expansion, and the Santa Monica Blvd. Transitway Project be considered.

3. That no mitigations be allowed that conflict with the theory of the ATCS system which was the primary mitigation for the Constellation Place project. Specifically, this would prohibit any mitigation which provides priority signalization for busses or other mass-transit, or any other alteration of traffic signalization timing.
4. Given that the ATCS system was paid for by Constellation Place as its primary traffic mitigation, we request that the impacts of ATCS not be allowed to reduce the traffic generation of the new structure. Specifically, we would accept any calculation in which the impact of ATCS is applied both to the pre-project and post-project traffic counts. We would strongly challenge any calculation which attempts to increase exclusively the post-project capacity of the relevant intersections as that would result in double-use of a mitigation measure.
5. With respect to the Santa Monica Project, we request that any traffic study not include "smart-corridor" or other mass-transit signal timing on any thoroughfare or within any intersection in which the City plans to deploy ATCS as a result of the Constellation Place project as any such practice would, by definition, conflict with ATCS.
6. That the traffic study include all underlying formulas and assumptions which are used to calculate actual traffic which will be generated by the proposed project and its impact on traffic patterns in the area.
7. That, in the absence of treating the project as a new project, rather than a replacement structure, the actual traffic increases on the area be considered per the West L.A. TIMP.

Given that the Constellation Place project materially impacted 38 intersections prior to the introduction of the ATCS system, but after all other mitigations, Tract 7260 is doubtful that any meaningful mitigations can be put in place for the new project. In short, only a full traffic study which covers the surrounding area and all relevant pathways to freeways, including cut-through traffic, would suffice.

Tract 7260 appreciates this opportunity to be involved with the planning process and looks forward to an energetic and thorough discussion of all relevant issues.

Sincerely,



Richard S Harmetz, Secretary
Tract No. 7260 Association

LOS ANGELES POLICE DEPARTMENT



JAMES K. HAHN
Mayor

BERNARD C. PARKS
Chief of Police

P.O. Box 30158
Los Angeles, Calif. 90030
Telephone: (213) 485-3205
Ref #: 1.1.2

January 31, 2002

Ms. Maya Zaitzevsky
Project Coordinator
Department of City Planning
200 North Spring Street, Room 525
Los Angeles, California 90012

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ENVIRONMENTAL
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Dear Ms. Zaitzevsky:

PROJECT TITLE: 2000 Avenue of the Stars

The proposed project involves the Los Angeles Police Department's (LAPD's) West Los Angeles Area. I have enclosed Area and individual Reporting District population, average crime rate per thousand persons, predominant crimes, response time to emergency calls for service, Area personnel statistics and information. The Department's response is based on information received from the Area in which the project is located, LAPD's Information Technology Division and input from Community Liaison/Crime Prevention Unit (CL/CPU) personnel.

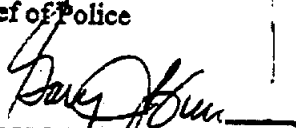
A project of this size would have a significant impact on police services in West Los Angeles Area. The LAPD's Community Relations Section, CL/CPU is available to advise you regarding crime prevention features appropriate to the design of the property involved in the project. The LAPD strongly recommends developers contact CL/CPU personnel to discuss these features.

Upon completion of the involved project, you are encouraged to provide the West Los Angeles Area commanding officer with a diagram of each portion of the property. The diagram should include access routes and any additional information that might facilitate police response.

Questions regarding this response should be referred to Lieutenant Fred Booker, Community Relations Section, at (213) 485-4101.

Very truly yours,

BERNARD C. PARKS
Chief of Police


GARY J. BRENNAN, Commander
Commanding Officer
Community Affairs Group

Enclosures

WEST LOS ANGELES AREA

The 2000 Avenue of the Stars project is located in West Los Angeles Area, in Reporting District (RD) 839. The West Los Angeles Area covers 64.3 square miles and the station is located at 1663 Butler Avenue, West Los Angeles, California 90025, (310) 575-8404.

The service boundaries of West Los Angeles Area are as follows: Mulholland Drive and Owen Brown Road to the north, Pacific Coast Highway, Los Angeles City Boundary, and Santa Monica Freeway (10) to the south, the Los Angeles City Boundary to the west, and the Los Angeles City Boundary to the east.

The boundaries for RD 839 are as follows: Santa Monica Boulevard to the north, Fox Hills Drive to the west, Olympic Boulevard to the south, Los Angeles City Boundary to the east.

The average response time to emergency calls for service in West Los Angeles Area during 2001 was 8.7 minutes. The Citywide average during 2001 was 8.9 minutes. There are approximately 259 sworn officers and 33 civilian support staff deployed over three watches at West Los Angeles Area.

There were 34 crimes per 1000 persons in West Los Angeles in 2001. Individual RD crime statistics, population and crimes per 1000 persons are listed on the attached RD information sheets. The predominant crimes in West Los Angeles Area are Burglary from vehicle, misdemeanor theft and grand theft.

Prepared by:
Community Relations Section
Community Liaison/
Crime Prevention Unit

**LOS ANGELES POLICE DEPARTMENT
CRIMES BY REPORTING DISTRICT OF OCCURRENCE**

PROJECT NAME: 2000 Avenue of the Stars

TYPE OF CRIME	RD 839*	WEST LOS ANGELES AREA*	CITYWIDE
Burglary from Business	26	312	5,823
Burglary from Residence	2	779	14,926
Burglary Other	6	216	4,857
Street Robbery	0	245	11,019
Other Robbery	8	195	6,155
Murder	1	11	589
Rape	5	47	1,424
Aggravated Assault	17	687	33,178
Burglary from Vehicle	31	1,357	25,786
Theft from Vehicle	15	624	15,607
Grand Theft	122	1,085	12,470
Theft from Person	2	26	1,222
Purse Snatch	1	17	371
Other Theft	141	1,228	24,273
Bicycle Theft	0	0	41
Vehicle Theft	15	904	31,991
Bunco	0	10	157
TOTAL	392	7,743	189,889

CRIMES PER 1000 PERSONS

REPORTING DISTRICT	CRIMES	/	POPULATION X 1,000	CITYWIDE =50/1,000
RD 839	392	/	4,969 x 1,000	79/1,000
WEST LOS ANGELES	7,743	/	225,558 X 1,000	34/1,000

* All statistical information is based on 2001 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 report.

Ilse Maness

*2132 Century Park Lane, #203
Los Angeles, CA 90067*

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FEB 04 2002

ENVIRONMENTAL
UNIT

January 31, 2002

Ms. Maya Zaitzevsky
Lead City Agency
Los Angeles Dept. of City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012

Dear Ms. Maya:

As a resident near the project entitled "2000 Avenue of the Stars, Case No: ENV-2001-4027-CU," I vehemently oppose a permit being issued to demolish 67,822 sq. ft. of commercial space, including the Schubert Theatre.

This proposal to abolish what is now a beautiful structure and cultural asset to the Los Angeles community will be harmful to our air quality, geology and soil, cause hazardous material, create noise and obstruct traffic. There is enough congestion and commercial building development in our city, whilst there is a definite lack of cultural facilities especially theatre. To destroy what now exists in Century City is truly a waste of money, human resources, and will cause pollution both culturally and environmentally.

Sincerely,



Ilse Maness

IM:hs

Arturo Meza

10340 Bellwood, #238
Los Angeles, CA 90064

REC-112-2
CITY OF
FEB 7 2002
ENVIRONMENTAL
UNIT

January 22, 2002

Maya 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

NV-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.

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
Arturo Meza

cc: Councilman Jack Weiss

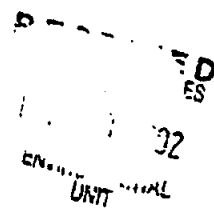
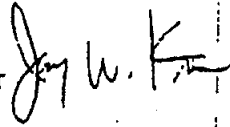
CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

2000 Avenue of the Stars
DOT Case No. WLA 01-041

Date: February 1, 2002

To: Maya Zaitzevsky, Project Coordinator
Department of City Planning

From: Jay W. Kim, Senior Transportation Engineer
Department of Transportation



Subject: **NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL
IMPACT REPORT (DEIR) FOR THE 2000 AVENUE OF THE STARS
PROJECT**

The Department of Transportation (DOT) has reviewed the Notice of Preparation for the Draft EIR for the 2000 Avenue of the Stars Project. The project's traffic consultant should contact DOT to set up a pre-scoping meeting to determine the necessary requirements and key assumptions including, but not limited to, trip generation rates, geographic distribution, trip assignment, study intersections, significant impact criteria, existing conditions, future roadway improvements and related development projects, for preparing the traffic analysis.

One key issue and prerequisite that must be resolved and met prior to the submittal of a traffic study is the determination of existing land use/trip credit. This would entail the existing use square footage and land use verified and approved by the City Planning Department prior to preparation of a traffic study. Pursuant to the West Los Angeles Transportation Improvement and Mitigation Specific Plan Ordinance 171,492 (WLA TIMP), Section 4.A.2.(e) states that Projects which are subject to a development agreement which was entered into on or before the effective date of this Specific Plan are exempted from the WLA TIMP. The WLA TIMP went into effect on March 8, 1997. Should this be the case, the existing trip credit would be entitled by the effective development agreement. However, in the absence of a relevant development agreement, Section 4.C.2.(c), would apply as follows: "LADOT shall grant a credit for each Trip generated by the existing use, if the existing use has been in place and operating for at least one year continuously during the four years immediately preceding the application for a building permit. LADOT shall grant a credit for 50 percent of the Trips generated by the existing use if the use has been in place and operating for at least 6 months continuously during the same four-year period. Off-site parking areas or lots which serve a Project shall be considered a part of the Project for trip calculation and credit purposes."

If you have any questions, you may contact me or Esther Tam of my staff at (213) 485-1062.

D:\My Files\WEST LA\AveofStars2000\wpd

- c: Renee Schillaci, Fifth Council District
- Dan Kahn, Mayor's Office
- Roy Nakamura, Crain and Associates
- Allyn Riskin, Esther Tam, DOT

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

LAW OFFICES OF
GAINES & STACEY LLP
WARNER CENTER PLAZA
21650 OXNARD STREET, SUITE 500
WOODLAND HILLS, CA 91367-4901

TELEPHONE (818) 593-6355
(310) 384-1163
FACSIMILE (818) 593-6356
INTERNET: WWW.GAINESLAW.COM

FAX TRANSMITTAL

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

FAX #: 213 847-3014
213 978-2250
213 891-8763

FROM: Fred Gaines, Esq.

DATE: February 04, 2002

Number of pages including this cover page: 13

CLIENT/CASE NAME: Cheviot Hills Homeowners Association

MESSAGE: Attached please find correspondence of this date regarding the above-referenced matter.

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is PRIVILEGED, CONFIDENTIAL and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original to us by mail without making a copy. Thank you.

If there is a problem with transmission or if all pages are not received, please call Cameron Hardy at (818) 593-6355 for retransmission.

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

LAW OFFICES OF
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INTERNET: WWW.GAINESLAW.COM

February 4, 2002

ORIGINAL SENT BY U.S. MAIL

VIA FACSIMILE (213) 978-1373

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

Re: 2000 Avenue of the Stars
Case No. ENV-2001-4027-CU
Response to Notice of Preparation dated January 4, 2002

Dear Ms. Zaitzevsky:

This letter is submitted on behalf of our client, the Cheviot Hills Homeowners Association ("CHHA"), for the purpose of providing a response to the Notice of Preparation ("NOP") for the above-referenced 2000 Avenue of the Stars project (the "Project"). While CHHA is gratified that the City recognizes the necessity of an Environmental Impact Report ("EIR") for the Project, rather than the originally envisioned Mitigated Negative Declaration, CHHA is concerned that the EIR adequately address a full range of potential environmental impacts, mitigations, and alternatives in a thorough and accurate manner.

**I.
INTRODUCTION.**

CHHA 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 City has claimed that the traffic impacts of other recent projects (most notably the Fox Studios expansion) on the Cheviot Hills area

Maya E. Zaitzevsky
February 4, 2002
Page 2

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 CHHA and for all who travel the Motor Avenue corridor.

Following a brief summary of argument, this letter will set forth in detail CHHA's responses to the NOP and the Initial Study. The letter first sets forth the legal inadequacies of 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 received from individual members of CHHA at the January 14, 2002 scoping meeting.

II. SUMMARY OF ARGUMENT.

The EIR must correct the following flaws in the Initial Study:

- 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 Initial Study is woefully inadequate with regard to its 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 theaters, 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. The EIR must analyze the Project's actual traffic impacts.
- Air Quality.
The Initial Study fails 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.

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- Cumulative Impacts.

The discussion of cumulative impacts in the Initial Study is woefully inadequate. The Initial Study concludes 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 the Draft EIR must be prepared and circulated for comment based on an accurate analysis of the Project's impacts as compared to the actual, current status of the Property.

III.

THE INITIAL STUDY IS LEGALLY INADEQUATE AND BASING AN EIR THEREON WOULD CONSTITUTE PREJUDICIAL ERROR AND ABUSE OF DISCRETION.

The Initial Study is seriously defective and does not meet the requirements mandated by CEQA. The Initial Study is 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 an EIR based on the Initial Study in its current form would constitute a prejudicial abuse of discretion, 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

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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 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 is woefully inadequate in its 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 theaters, 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.

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The EIR needs to contain a complete analysis of current actual trip counts (based on manual counts, not on ITE Manual estimates), showing actual traffic and parking usage generated by the Entertainment Center only (not the adjacent twin towers), and showing both AM and PM peak hour counts, along with average daily trips, from both weekdays and weekends. These counts must be taken on appropriately representative dates, and not on general holidays, religious holidays, or school vacations. Then, the EIR must show the same information for the proposed Project so that the impacts can be accurately compared against the actual current situation.

C. Air Quality.

The Initial Study fails 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 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 to seriously review air quality impacts renders them defective and requires restudy prior to preparation 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 fails 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 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

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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.

This proposed Project cries out for a detailed analysis of cumulative impacts. It is 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 Initial Study is woefully inadequate. It concludes 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 St. Regis or Century Plaza Hotels as uses that are potentially sensitive to light from the proposed Project.

Page 4-21 of the Initial Study:

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

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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.

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 EIR to conclude that the Project will not have a significant adverse impact on parking.

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V.
ADDITIONAL AREAS FOR STUDY IN AN EIR.

In addition to the foregoing, the EIR must contain adequate analyses of the following:

Traffic:

1. **Trip Generation Studies**

All trip generation studies in the EIR must show current trips based on current existing ACTUAL trips generated during AM and PM peak hours during both weekdays and weekends. Likewise, all trip generation studies in the EIR must show future trips based on the new Project's ACTUAL trips generated during AM and PM peak hours during both weekdays and weekends (based on observations of similar uses in the same area, rather than on ITE manual figures). Traffic studies are not to be conducted on holidays or during school vacation time, and must reflect actual AM and PM peak hours (not pursuant to ITE manuals, but pursuant to actual traffic patterns in the area), not merely daily averages.

2. **Changes in Hours of Peak Traffic Activity**

The EIR must examine how the change-over from restaurants and theaters (generally evening and weekend traffic generators) to office space (generally a weekday traffic generator) will affect Project trip generation and peak hours of traffic.

3. **Scope of Traffic Analysis**

Traffic impacts of the Project must be studied all the way south to the 10 Freeway, including impacts on all of Cheviot Hills, including Motor Avenue and Manning Avenue.

4. **Effective Mitigation Measure Monitoring and Enforcement**

The EIR and proposed Mitigation Monitoring Program must include identifiable and effective measures to ensure compliance by the Project developer and the City agencies charged with enforcement and implementation.

Demolition and Construction:

1. **Haul Route and Construction Plans**

The EIR must identify the proposed haul route for Project construction, as well as proposed staging

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locations and construction hours. The EIR must disclose the environmental impacts of these factors and provide mitigation measures as necessary.

2. Noise and Pollution

Based on the foregoing information, the EIR must identify the demolition and construction related noise and pollution impacts of the Project, and identify mitigation measures, including ongoing air and water sampling to ensure compliance with air and water quality standards.

Tenant Mix and Project Usage:

1. Project Description

The EIR must specifically describe all specific uses and square foot allocations within the Project. How many restaurants are proposed, and of what size? What is the size, scope and proposed use of the cultural center? What other uses are anticipated: e.g., gym facilities, private clubs, etc.?

2. Ingress, Egress and Security

The EIR must precisely identify all of the Project's proposed entrances and exits, and should identify all security measures that will be included to ensure public safety.

3. Rooftop Heliport

The EIR must prohibit the use of a rooftop heliport or helicopter landing pad. If one is proposed for the Project, the environmental impacts, including noise and air quality, must be disclosed and mitigated.

4. Events in Open Air Plaza

The EIR must identify the proposed usage and scheduling of events in the Project's open air plaza.

5. Rooftop Signage

The EIR must prohibit the use of rooftop signage on the proposed Project.

6. Certificate of Occupancy

The EIR and Mitigation Monitoring Program must condition the issuance of a Certificate of Occupancy for the Project on the completion of all mitigation measures.

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Parking and Transportation:

1. The EIR must specify the number of parking spaces assigned to existing buildings and the number of new spaces that will be added for the new Project.
2. The EIR must specify the location of the off-site parking for the Project.
3. The EIR must specify the use of valet parking in the Project's parking lot, and the location for the parking of valeted cars.
4. The Trammel Crow brochure for the Project references "Upgraded Transportation." The EIR should define this term, and disclose the features and impacts of this "Upgraded Transportation."
5. The Project's impacts on, and access to, emergency services (i.e., police and fire) must be analyzed in the EIR.

Cumulative Impacts:

1. The EIR must thoroughly examine the Project's cumulative impacts in conjunction with all new and proposed projects in the Century City area.

Alternatives:

The EIR must examine a reasonable range of alternatives to the proposed Project including, but not limited to:

1. Multi-family housing;
2. Commercial project with all night-time uses;
3. Hotel;
4. Smaller commercial projects (ranging from 30% to 70% of the proposed Project's mass and square footage); and
5. No project.

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VI.
CONCLUSION.

In conclusion, the Initial Study is legally inadequate. The Initial Study must be substantially revised, and an EIR prepared and circulated prior to certification. Public hearings with wide community notice should be held prior to the issuance to any Final EIR for this Project. This is one of the last major projects in the Century City area, and it is crucial to CHHA, and to all of the nearby neighborhoods, that this Project's impacts be thoroughly analyzed and fully mitigated.

Thank you for your consideration. Should you have any questions or comments, please do not hesitate to contact me.

Sincerely,

GAINES & STACEY LLP

By


FRED GAINES

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

LAW OFFICES
CHRISTENSEN, MILLER, FINK, JACOBS, GLASER, WEIL & SHAPIRO, LLP

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February 4, 2002

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

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

Dear Ms. Zaitzevsky:

This law firm represents the Pivotal Century Plaza, LLC, the owner of the St. Regis Hotel and the Century Plaza Hotel located directly across the street from the above-referenced proposed project. The purpose of this letter is to set forth -- on behalf of the project's closest and most impacted neighbors -- our client's serious concerns about the Trammell Crow Company's application to demolish and redevelop the ABC Entertainment Center.

Both the St. Regis Hotel and the Century Plaza Hotel will be greatly impacted by the design, construction and operation of the project, particularly during the extensive demolition and lengthy construction period for this massive project. Once built, the project itself will pose potential traffic, pedestrian circulation, parking, shade and shadow, noise, wind and view impacts to the hotels and their guests. Most significant to our client, the project will eliminate the heavily-used pedestrian plaza currently connecting the Century Plaza Hotel and the ABC Entertainment Center and force pedestrians to cross Avenue of the Stars at grade.

Construction-Related Impacts

The potential construction-related impacts during the estimated 27 month demolition, hauling and construction period which must be thoroughly evaluated in the City's environmental impact report (EIR) include, but are not limited to, traffic access and circulation, hauling operations, staging areas, pedestrian access and circulation, parking, noise and air quality impacts. The nearby hotels must be considered sensitive receptors with 24-hour accommodations which will be highly susceptible to disruption during the construction period.

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Traffic Impacts

We are concerned that the actual traffic impacts of the new project must be compared against the existing traffic generated by the project. It appears that the calculations made under the Specific Plan "Replacement Trip" generation table for existing traffic are overstated. No consideration has been given to the internal discounts now experienced on the site. Currently existing office tenants utilize the theater, cinema, retail, health club and restaurant uses. By substantially reducing restaurant and retail uses and eliminating theater, cinema and health club uses, the new project eliminates these internal discounts and in its place adds more than 400,000 square feet of net new peak hour office trip generation.

In addition to the internal discounts, the current use mix attracts a significant amount of "pass by" and "walk in" trips. The theater, cinema, retail, health club and restaurant uses attract many nearby workers who walk to the site and attract many visitors already in the area visiting the site for another trip-making purpose. Finally, the proposed new project eliminates off peak uses such as theater, cinema, health club and restaurant uses and replaces them with peak hour generating office uses.

It is not possible that this new mix of uses does not result in new peak hour traffic impacts in the area.

Land Use Impacts

The EIR must also thoroughly analyze land use compatibility impacts, in particular land use compatibility with the existing first-class hotels across the street. The project as proposed will adversely impact the existing pedestrian access between the Century Plaza Hotel and the project site. The current design does not adequately address overall pedestrian circulation between the two properties. The retail amenities on the project site are not placed to enhance the pedestrian linkage of this site with the hotel and the rest of Century City.

The EIR must also evaluate pedestrian circulation and safety. The existing wide pedestrian walkway under Avenue of the Stars has been in place for several decades. The walkway is heavily used and provides hotel guests along with all pedestrians in the area from nearby high-rise offices, with safe and convenient access to amenities on both properties, including restaurants, theaters, stores and banks. In place of this safe pedestrian link the project proposes to direct pedestrian traffic to the crosswalks at the intersection of Constellation Place and Avenue of the Stars. The increase in pedestrian crossings at that intersection must be studied in terms of the traffic flow through the intersection and in terms of pedestrian safety.

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The land use compatibility issue must also be analyzed in the context of consistency with the Century City North Specific Plan regulatory framework. Any change to the design of the existing pedestrian access required under the Specific Plan will significantly impact both the hotel and the surrounding area and will impede the Specific Plan goals of pedestrian linkage.

Parking Impacts

The current documents on file with the City are vague concerning project parking. The EIR must provide sufficient detail to carefully analyze potential impacts, both in terms of Code requirements and in terms of changes to existing conditions. Again, eliminating many uses with off-peak, internal, walk-in and pass-by traffic credit and replacing those uses with office uses will severely overburden the existing parking during daytime hours.

It is also unclear how the current and proposed use of off-site parking will be impacted by the proposed changes. Will the change in the pedestrian connections on the site impact the path of travel to and from the off-site parking? Will project tenants and employees who currently use the safe Century Plaza Hotel pedestrian plaza linkage be forced to cross Avenue of the Stars at grade?

Other Operational Impacts

In addition to the traffic, pedestrian circulation, parking and land use impacts discussed above, the project will also pose potential shade and shadow, noise, wind and view impacts to the hotel and its guests. Each of these areas must be analyzed in the EIR, and the Century Plaza Hotel must be considered a sensitive receptor for the purposes of each of these analyses in the EIR. The hotel includes balconies, pool areas and a large outdoor plaza on the east side of the building which would be adversely affected by increased shadows, noise and wind jarring effects. The proximity of the proposed new 16-story office building to the Century Plaza Hotel will create a "corridor" effect on Avenue of the Stars in stark contrast to the current open plaza currently in place.

Notification

Notice of the scoping meeting was buried within the text of the Notice of Preparation and was inadequate. With a project of this size, it is imperative that the City thoroughly consider and mitigate all of the potential impacts in a public forum, and thus the City must provide full and clear notification of all further proceedings. We request that notification of all future proceedings related to the EIR and the project be sent to my attention as follows:

Maya Zaitzevsky, Project Coordinator
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Clare Bronowski
Christensen, Miller, Fink, Jacobs, Glaser, Weil & Shapiro, LLP
2121 Avenue of the Stars, 18th Floor
Los Angeles, CA 90067

We look forward to continuing to participate in the City's EIR and entitlement review process. Thank you for your attention.

Sincerely,



Clare Bronowski
of CHRISTENSEN, MILLER, FINK, JACOBS,
GLASER, WEIL & SHAPIRO, LLP

CB:cb

cc: Councilmember Jack Weiss
Planning Director Con Howe

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February 4, 2002

VIA FACSIMILE AND U.S. MAIL

Ms. Maya Zaitzevsky, Project Coordinator
Environmental Review Section
City of Los Angeles Planning Department
200 North Spring Street
Los Angeles, California 90012

Re: 2000 Avenue of the Stars; ENV-2001-4027-CU

Dear Ms. Zaitzevsky:

We are writing on behalf of our client, Century City Garage Partners L.P. ("CCGP") to provide comments in response to your January 4, 2002 Pre-Draft Request for Comments ("Request for Comments"). CCGP is the owner of the parking garage located at 2030 Century Park West, which is referenced in the Project Description and in the Request for Comments.

CCGP initially wishes to note that it has no objection to the applicant's development of a new project upon the site of the existing buildings located at 2020 and 2040 Avenue of the Stars provided that responsible planning is carried out by the applicant and by the City. However, there are serious errors in connection with this project application which must be corrected immediately, and are discussed below.

A. No Proceedings Involving CCGP's Property can be Undertaken without CCGP's Written Consent - which has Not Been Granted

CCGP has not signed or consented to any application for the project described in the Project Description in the Request for Comments, and yet CCGP's property is referenced as being included in the project in violation of the City's own requirements (requiring notarized consent all property owners entailed by a project application) and well established California law. See *Glass v. Gulf Oil Corporation* (1970) 12 Cal. App. 3d 412 (holding planning proceedings regarding non-consenting owner's property constituted slander of title regardless of decision on proposed project).

CCGP's property is not part of the applicant's project, and the City of Los Angeles must immediately cease and desist from any proceedings involving CCGP's property. In the

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Ms. Maya Zaitzevsky,
Project Coordinator
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alternative, the project description should be revised to eliminate representations that any parking for the applicant's project will be provided at CCGP's property.

B. The Parking Covenants Referenced in the Project Description will be Terminated when the 2020 and 2040 Avenue of the Stars are Demolished

As discussed in the preceding section of this letter, entitlement proceedings cannot be continued which involve CCGP's property since CCGP has not given its written consent to the same. If proceedings are continued (without the involvement of CCGP's property), an appropriate environmental analysis must be prepared, as discussed in the remainder of this letter.

The Project Description in the applicant's application states that "451 off-site parking spaces [in the garage located on CCGP's property] are covenanted for 2020 and 2040 Avenue of the Stars." The City's Request for Comments similarly states that refers to "451 off-site parking spaces [in the garage located on CCGP's property] which are covenanted for use by 2020 and 2040 Avenue of the Stars."¹

The project description in the applicant's application states that "the proposed project will remove all of the site uses except for the Century Plaza Towers along Century Park East." (emphasis added) The City's Request for Comments similarly states that the buildings commonly known as 2020 and 2040 Avenue of the Stars are to be demolished for the applicant's project.²

Both of the off-site parking covenants referenced in the project descriptions (Instrument Nos. 83-230834 and 94-218657); hereinafter, the "Covenants") state that the Covenants shall only continue in effect so long as the "use or building requiring such parking is required is maintained..."

¹ Building permit records of the City's Building & Safety Department state that in excess of 1,595 parking spaces are required in connection with 2020 and 2040 Avenue of the Stars. Such parking requirement significantly exceeds the 451 spaces provided by the Covenants.

² The applicant's project consists of primarily daytime parking generating uses (i.e. office uses), and will virtually eliminate the nighttime, seasonal (with respect to the Shubert Theater), and pedestrian uses currently provided in 2020 and 2040 Avenue of the Stars. Therefore, the daytime parking demand of the applicant's new project will be significantly increased from that generated by the existing 2020 and 2040 Avenue of the Stars buildings.

IRELL & MANELLA LLP
A REGISTERED UNITED LIMITY LAW PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATION

Ms. Maya Zaitzevsky,
Project Coordinator
February 4, 2002
Page 3

As acknowledged by both the applicant's application and the City's materials, the uses and buildings at 2020 and 2040 are to be removed/demolished, and accordingly will no longer be "maintained." Accordingly, at the time the buildings located at 2020 and 2040 are removed/demolished, the Covenants will automatically be terminated by their express terms and by operation of law.³

C. The Amount of Parking Represented to be Provided by the Applicant's Project is Incorrect.

Because the applicant has no authority to represent that the CCGP's parking garage is part of its new project, and because the Covenants will be terminated in accordance with their own terms and by operation of law, 451 off-site parking spaces will not be provided on CCGP's property as erroneously represented in the applicant's and the City's materials.

For these reasons, the applicant's statement that the project will provide 6,294 parking spaces is erroneous, as is the statement in the City's Request for Comments which indicates that the project will provide 6,314 parking spaces. Because the 451 off-site spaces at CCGP's property will not be provided, there will be no more than 5,843 or 5,863 parking spaces provided for the applicant's project (depending whether the base number in the applicant's project description or the base number in the City's Request for Comments is used).

The City's environmental analysis should be prepared accordingly.

D. Conclusion

In conclusion and as stated initially, CCGP has no objection to the applicant's development of a new project upon the site of the existing buildings located at 2020 and 2040 Avenue of the Stars provided that responsible planning is carried out by the applicant and by the City. CCGP's property is not part of the applicant's project, and either the proceedings with respect to the project should be terminated, or the project description should be revised to eliminate representations that any parking for the applicant's project will be provided at CCGP's property.

We look forward to reviewing the draft Environmental Impact Report for the project when it is prepared by the City. We respectfully request that our office be provided with

³ CCGP hereby requests that upon the issuance of demolition permits for the buildings located 2020 and 2040 Avenue of the Stars, the Department of Building and Safety provide CCGP with written acknowledgments that the Covenants are terminated, so as to allow CCGP to clear the Covenants from the title records for CCGP's property.

IRELL & MANELLA LLP

A REGISTERED LIMITED LIABILITY LAW PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATION

Ms. Maya Zaitzevsky,
Project Coordinator
February 4, 2002
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copies of the Environmental Impact Report, as well as any staff reports, and notices regarding the project. Thank you very much for your cooperation, and as always, please do not hesitate to contact me if you have any questions or comments.

Very truly yours,


Allan I. Abshez

AJA

cc: Mr. John Barroth
Councilman Jack Weiss, 5th District
Ms. Renee Schillaci



California Integrated Waste Management Board

Linda Moulton-Patterson, Chair
1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov

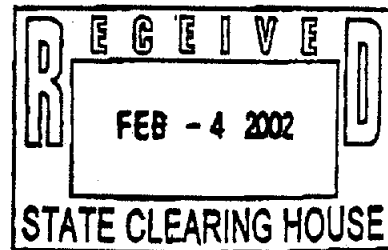


Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

February 4, 2002

Maya Zaitzevsky
Los Angeles City Planning Department
200 North Spring Street, Room 763
Los Angeles, CA 90012



Subject: SCH No. 2002011024 – Notice of Preparation for a Draft Environmental Impact Report for the Demolition of 2000 Avenue of the Stars, Los Angeles, County of Los Angeles.

Dear Ms. Zaitzevsky:

The California Integrated Waste Management Board's (CIWMB or Board) Environmental Review Section staff has received the Notice of Preparation cited above and offer the following comments.

CIWMB Authority

The Board does not regulate or issue permits for this type of project; therefore, all comments and questions are provided from the perspective of a "commenting agency" in order to assist the Lead Agency in identifying significant environmental issues and to facilitate the evaluation process under the California Environmental Quality Act (CEQA).

CIWMB Staff's Understanding of the Proposed Project

The proposed project is to obtain a Major Project Conditional Use Permit for the demolition of 678,822 square feet of commercial space, including the Schubert Theater, located within two, eight story buildings. These buildings will be replaced with the construction of a 15-story building with 778,947 square feet of space.

Environmental Review Section Staff Comments

The Environmental Review Section staff recommend for accuracy and clarity, the Draft Environmental Impact Report, should include but not be limited to:

- Describe any recycling and reuse efforts for the materials generated by the project.
- Estimate the volume and weight of recyclable and disposal materials and a specific period (weekly, monthly, quarterly) when the materials will be generated.
- Provide information regarding the disposal or recycling sites proposed for utilization. This information would include the disposal sites names, site locations and that the site is permitted to accept all types of construction and demolition debris. Not all landfills are permitted to accept construction and demolition debris; therefore, the proponent must verify that the landfill is permitted for and has the capacity to receive the additional waste.
- Address CEQA Guideline Environmental Checklist Items under Utilities and Service Systems as follows:
 - (f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and
 - (g) Comply with federal, state, and local statutes and regulations related to solid waste.

Summary

Some of the landfills in the project area are at or near their daily permitted capacity while others have unused or available permitted capacity. Contact the landfills in your area for available capacity or contact the Local Enforcement Agency (LEA) for more information, LEAs for the City of Los Angeles are: Wayne Tsuda, Director, at 213.978.0864 or Vivian Marquez at 213.978.0866.

The Board's Environmental Review Section staff has no further comments at this time. We look forward to receiving the Draft Environmental Impact Report and hope this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

If you have any questions regarding these comments, please contact me at 916.341.6728 or email me at rseamans@ciwmb.ca.gov. For more information regarding construction and demolition debris look at our website on the Internet under <http://www.ciwmb.ca.gov/ConDemo>.

Sincerely,



Raymond M. Seamans
Integrated Waste Management Specialist
Environmental Review Section
Permitting and Inspection Branch
Permitting and Enforcement Division
California Integrated Waste Management Board

2000 Avenue of the Stars DEIR

2/4/2002

cc: **Bill Marciniak**
Integrated Waste Management Specialist
Permitting and Inspection Branch
Permitting and Enforcement Division
California Integrated Waste Management Board

Suzanne Hambleton
Supervising Integrated Waste Management Specialist
Permitting and Inspection Branch
Permitting and Enforcement Division
California Integrated Waste Management Board

Sue O'Leary
Supervising Integrated Waste Management Specialist
Environmental Review Section
Permitting and Inspection Branch
Permitting and Enforcement Division
California Integrated Waste Management Board

Wayne Tsuda, Director
Vivian Marquez
Environmental Affairs Department
200 Spring Street, Room 1905
Los Angeles, CA 90012

Department of Water and Power



the City of Los Angeles

JAMES K. HARN
Mayor

Commission
KENNETH T. LOMBARD, *President*
DOMINICK W. RUBALCAVA, *Vice President*
ANNIE E. CHO
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JOHN C. BURMAHLN, *Secretary*

DAVID H. WIGGS, *General Manager*
FRANK SALAS, *Chief Operating Officer*

February 20, 2002

Ms. Maya Zaitzevsky
City Planning Associate
Environmental Review Section
200 North Spring Street, Room 763
Los Angeles, California 90012

RECEIVED
CITY OF LOS ANGELES
FEB 25 2002
ENVIRONMENTAL
UNIT

Dear Ms. Zaitzevsky:

Notice of Preparation of Draft Environmental Impact Report
2000 Avenue of the Stars

This is in reply to your January 4, 2002 letter requesting pre-draft comments on possible environmental impacts on the water system by the proposed demolition of two existing 8-story commercial buildings, including the Schubert Theater, and construction of a 15-story building with office, restaurant, retail, and cultural spaces.

The Los Angeles Department of Water and Power (LADWP) expects to be able to provide an adequate supply of water for domestic consumption from the existing distribution system. The latest consumption figures for Century City's Zip Code 90067 was 1,210,647 GPD (Gallons Per Day) for the period July 2000 through June 2001. Please refer to the enclosed document titled, "Impact of the Proposed Project on the Water System and Methods of Conserving Water Department of Water and Power" for additional information.

LADWP can provide a public fire flow demand of approximately 9,000 GPM (Gallons Per Minute) from the existing distribution system. If public fire flows, as required by the Los Angeles City Fire Department, are in excess of this amount, main replacements would be required.

If you have any questions, please contact me at (213) 367-1218.

Sincerely,

LUIS NUNO
Engineer of Western District
Water Distribution Engineering

Enclosure

Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California Mailing address: Box 51111, Los Angeles 90051-0100
Telephone: (213) 367-4211 Cable address: DEWAPOLA FAX: (213) 367-3287

IMPACT OF THE PROPOSED PROJECT ON THE
WATER SYSTEM AND METHODS OF CONSERVING WATER
DEPARTMENT OF WATER AND POWER

IMPACT ON THE WATER SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in the mid 1970's and the late 1980's dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

WATER CONSERVATION

The Water System will assist residential, commercial and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction.

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.
3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty", pp. 78-85, or consult a landscape architect.
4. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.
5. Lower-volume water closets and water saving showerheads must be installed in new construction and when remodeling.
6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Water Conservation Office by calling (213) ~~367-0944~~

1-800-203-7380

LAW OFFICES OF
PAUL H. SAMUELS
A PROFESSIONAL CORPORATION
10100 SANTA MONICA BOULEVARD, 8TH FLOOR
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (310) 772-2244
FACSIMILE (310) 772-2245
E-MAIL Phsamuels@aol.com

OF COUNSEL
KAREN G. KRASNEY

June 19, 2002

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Trammell Crow Company
Attn: ABC Entertainment Center Revitalization
2049 Century Park East, Suite 2650
Los Angeles, CA 90067-9429

Re: Proposed "ABC Revitalization Plan"
ABC Entertainment Center
2000 Avenue of the Stars, Century City, Los Angeles

Dear Sir or Madam:

I reside at 2314 Manning Avenue, Los Angeles. On June 18, 2002 I received your "survey" in the mail regarding your plans to build a new office building at the ABC Entertainment Center.

When I first heard about plans to remodel the ABC Entertainment Center by adding new office space and evicting one of the few legitimate theaters in Los Angeles, I was less than thrilled. I was not, however, motivated to action. Not, that is, until I received your "survey" that purported to solicit my opinion on the project with questions that ensured I could not give a negative response in any way, shape or form. That mailer has roused me from my complacency.

The people who live in neighborhoods which surround Century City are, for the most part, well-educated professionals. We're not stupid. The phrasing of the questions and the manner in which recipients are to record their responses treats the recipients as little more than village idiots. I do not appreciate being treated as if I were a dimwit. I am sure my neighbors feel the same way.

Trammell Crow Company
June 19, 2002
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In addition to the extremely slanted questions, your mailer is silent on the issues that really matter to residents who live near or work in Century City. Nothing in your mailer mentions increased traffic or mitigation. As an example, I live on Manning Avenue one block north of Pico. Manning Avenue is a favorite thoroughfare in the morning and evening for commuters traveling from the Santa Monica Freeway to and from Century City who want to avoid taking Motor Avenue. Anything that adds more office space to Century City is bound to add more traffic to what used to be a quiet street.

Nor does your mailer address parking issues. The garage underneath the twin towers and the ABC Entertainment Center is large, but not infinite. I am informed that it is close to or at capacity.

The mailer discusses "open space", including space for "intimate outdoor performances." Who is going to provide such performances? Currently the existing space between the Center and the towers is rarely used for performances.

Currently, I do not have enough information to decide whether to support the proposed project. Therefore, I would be grateful if you could provide me with answers to the following questions to enable me to decide whether to support the project or to oppose it.

1. How much additional office space (square feet) will the proposed project add to that already existing at the center?
2. What is the estimated number of additional office workers who will work in the new center (assuming full occupancy for the existing space and the proposed new space)?
3. What is the estimated number of additional parking places that will be needed for the tenants of the proposed new center?
4. What is the current capacity for the existing garage (number of parking spaces)?
5. What percentage of spaces in the garage during weekday business hours is currently used by the existing center (including office workers, employees of stores and restaurants, customers and visitors)?
6. What is the number of proposed retail spaces in the new center, and how are they allocated between retail stores and restaurants vis a vis the current center?

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7. What is the current cumulative automobile trip generation potential (CATGP) to the existing center (office and retail)?
8. What is the current estimate of CATGP to the new center (assuming full rental capacity)?
9. What is the current estimate of daily vehicular Trips, as that word is defined in the Century City North Specific Plan, for the new project?
10. What is the current estimate of Trip Percentage, as that word is defined in the Century City North Specific Plan, for the new project?
11. What is the current number of Trips currently available to the property?
12. Have there been any changes to the number of available Trips and Transferred Trips to the property since 1990?
13. Has the property owner, within the past two years, requested from the Department of City Planning a certification of the number of available Trips to the property, and if so, what are the dates of such certifications?
14. What studies have been done regarding the proposed center's traffic and parking issues?
15. Have any studies been done regarding increases or decreases in air pollution from traffic that will be going to and from the proposed center?
16. What traffic mitigation efforts does Trammell Crow have to insure that traffic using the new office building will not travel through residential streets?
17. Has Trammell Crow submitted any proposed alternative trip generation studies prepared by a registered traffic engineer to the City of Los Angeles Department of Transportation? If so, what are the dates of such studies?
18. Is any public art planned for the new center?
19. What plans does Trammell Crow have for outdoor performances?
20. What plans does Trammell Crow have to insure that there will be public performances in the future?

Trammell Crow Company
June 19, 2002
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21. What types of food service facilities are planned for the day-time tenants and visitors? If there are inadequate facilities for lunch and dinner – at all price ranges, more workers and visitors will use their vehicles to go to lunch, increasing traffic and air pollution.
22. What will happen to existing retail tenants, including the Cineplex Odeon theaters, and Harry's Bar?

I am not asking these questions because I am annoyed at your mailer. I sincerely wish to know the answers to these questions in order to decide whether to support or oppose the project.

I wish to be kept informed on the project status, including the dates and times of public hearings and the date the draft EIR is completed and available for review by the public.

I also suggest you hire a new publicist if you truly desire support from the neighborhoods surrounding Century City.

Thank you in advance for your time and consideration.

Very truly yours,



Paul H. Samuels

PHS:sm

cc: Los Angeles City Planning Department
Council member Ruth Galanter (6th District)
Council member Jack Weiss (5th District)

Pamela Wells
1814½ Selby Ave.
Los Angeles, CA 90025-4710

Tel./Fax: (310) 470-4473

July 1, 2002

Betsy Weisman,
Principal Planner
CITY OF LOS ANGELES PLANNING
Community Planning Bureau
200 N. Spring St., Rm. 621
Los Angeles, CA 90012

Re: 2000 Avenue of the Stars Project, Century City

Dear Ms. Weisman:

I live in, and have lived in for 19 years, the general neighborhood of the proposed new office building and grounds which are proposed to take the place of the present ABC Entertainment Center on Avenue of the Stars in Century City. I have received all the marketing materials from the project developers, and, to put it mildly, I am not impressed.

Please allow me to give my opinion on this new proposed project:

Although the old ABC Entertainment Center certainly needs some updating, let me tell you that, as a resident of the community and as a worker in and around that Century City address, the proposed building and grounds would offer very little, if anything, to residents and previous users of the property. If this plan is allowed, it would do nothing but enrich the property owners, and leave the residents and workers who rely on the site for various things (more below) with, literally, nothing.

If the site were merely updated, rather than razed, the community would still have wonderful restaurants and lounges, would still have retail sites (especially important to office workers in Century City, among whom I used to be), would still have a theater for live productions, would still have a world-class movie theater. What is WRONG with these developers, that they want to deprive the entire community of all these venues?

The casual lunchtime restaurants on the grounds are just great for the workers in the Towers (as many of my friends who work there still attest to), allowing them a wide array of choices for lunch, and the more formal restaurants are great for people residing in the community. Day workers on or near the premises also greatly enjoy shopping at the various stores during their lunch hours. The residents like the restaurants which offer wonderful dinners close to home. I am sure that workers in the Twin Towers and other office buildings nearby also greatly enjoy the availability of the restaurants serving dinner that exist there on the grounds.

Betsy Weisman, Principal Planner
re: Proposed 2000 Avenue of the Stars project

July 1, 2002
Page 2

I have been to many, many productions at the Schubert Theater. The Schubert cannot compare in size to the small Geffen, can offer productions grand in scale and, outside of the Geffen and maybe UCLA proper, we Westsiders do not have a nearby location for well-produced, live theater. We must drive all the way to downtown L.A., which most Westsiders loathe and will avoid at all costs. So if we want to see a production that is grander in scale than those offered at the Geffen and at UCLA, we have nowhere local to go. This is a travesty for legitimate theater.

The movie theaters on the property far surpass the theaters at the nearby Century City Marketplace. They offer large presentation rooms and comfortable, sight-line-friendly seating—two things not offered at the Century City Marketplace movie theaters or at the various Westwood movie houses.

There are so many things offered by the site as it now stands, and the developers plan to do away with virtually all of it! I am not swayed by their including in their plans open grounds. The workers at the Twin Towers **alREADY** have large expanses of grounds in which to enjoy their homemade lunches or to read a book; the ample grounds are located just adjacent to the Twin Towers. Thus, there is no need for even more grounds.

What this community needs is a re-vamping and updating of what now exists! I cannot believe that anyone would agree to allow the total destruction of this wonderful community resource, just so that developers could get richer renting office space to prosperous corporations and their equally prosperous corporate executives (and we have already read too much in the newspapers about the morals of Corporate America). The corporations and the law firms that are sure to rent office space from the developers do not need more office space! There is *plenty* of office space available during these less-than-affluent times right there in Century City and, a little further west, in the huge modern office buildings on the corners of Sepulveda and Santa Monica Bl., maybe just a mile west of the Century City site, where most of the offices stand vacant (I know: I've checked).

Even if one were to accept the existence of the new building, one would have to take exception to the architectural design of it. It is not aesthetically pleasing, is not innovative (in spite of the press release materials the developers are so fond of mailing to everyone), and is, to put it succinctly, a bloody bore. How could anyone think this is innovative architecture? It's probably just good business, something on the order of more offices being able to be leased per year, increasing the yield on the building. We residents have no stake in the yield on the building or the welfare of the developers. Why is Los Angeles allowing them to submit such a pedestrian plan for an office building? The building is plain to the point of being almost an eyesore.

Many of us local residents do not like to utilize Century City Marketplace because of the problems with parking (seemingly always encountered), the lack of a legitimate theater venue, the lack of a truly upscale movie theater, and the limitedness of the restaurants located there (which are 90% take-out). I and my fellow community residents and workers enjoy tremendously the

Betsy Weisman, Principal Planner
re: Proposed 2000 Avenue of the Stars project

July 1, 2002
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opportunity to buy a dress or a book, to purchase lunch at the myriad lunch establishments which don't require driving to, or dinner in fine restaurants, to have cocktails, to see a legitimate theater production, to see a movie in a comfortable, elegant venue — all things presently offered at the site. Now, the developers and the City of Los Angeles seem as if they are colluding to deprive the community of all these resources, just to enrich the pocketbooks of some greedy developers (sorry about the redundancy). We residents prefer to drive along the less-congested Olympic Boulevard, near where the projected project now stands, rather than along Santa Monica Boulevard, which is always congested. We are locals, and the people who go to the Century City Marketplace are, to a great extent, not. That is the difference. The ABC Entertainment Center premises is for locals, and we like it that way.

I would think that the owners of the Century Plaza Hotel, and the new hotel formerly called the Century Plaza Tower, as well as the owners of the condominium complexes in Century City, would stand opposed to this project, as well, for the ABC Entertainment Center complex provides their guests (via the underground passageway) and the condo tenants with stores to poke around, varying restaurants and bars, and the aforementioned live theater and upscale movie theater, all without having to retrieve their cars from valet parking or to drive at all! Century City NEEDS more pedestrian-friendly venues! The underground passageway between the Century Plaza Hotel, in itself, needs updating (more lighting, maybe some piped-in music — anything to give a feeling of more security). I personally would wish that the retail stores located in the complex would stay open longer than they do. Except for the Century Plaza Hotel and the Century City Marketplace, Century City becomes a ghost-town after work hours, making it resemble the business district downtown Los Angeles — and this isn't good for a community. That's like saying to community residents, "We care only about the commuting executives and workers." More exciting retail stores, restaurants, & clubs, along with an updating of the whole complex structure, would ensure a steady flow of people to the site, whose presence alone would give the site less of a ghost town feeling in the evenings, and residents would flock there due to, if nothing else, an increasing sense of security than exists there now.

This project should be made more community-friendly, so that more than just commuters could enjoy what Century City has to offer. I would even boldly suggest that it would be nice for the community to have, say, a cabaret, where singers could perform in an intimate setting. There is currently nothing like this on the entire western West Side. There is a jazz club, yes, Lunaria, which I much enjoy, but it's not a cabaret, and books almost exclusively jazz bands.

Please accept these comments in the spirit in which they are offered: I want this project to be more community-friendly, not just more commuter-friendly!

And please put me on your mailing list for future hearings on this matter. It would be NICE if the hearings were held someplace on the West Side so that we residents didn't have to drive all the way downtown to put our two cents in. It would be even nicer if the hearing were held after work

Betsy Weisman, Principal Planner
re: Proposed 2000 Avenue of the Stars project

July 1, 2002
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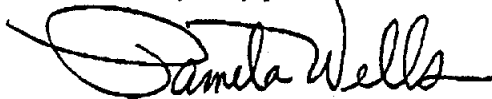
hours, so that normal folks could attend the hearings without having to suffer a diminution in paycheck by taking a day off of work, just to have a say in these proceedings. However, I know that Big Government doesn't work that way — it favors the Big Guns who get PAID to attend these hearings and meetings. So much for democracy at work!

I urge you and all your fellow planners to reject this plan and to consider any plans submitted to you which would allow local residents to indulge in all the amenities now located there. If this plan is approved, it will once again be the developers against all the local workers and residents, and I think their wishes should be taken into consideration.

Please note: The flyer which the developers, Trammell Crow Company, sends out to community residents includes a tear-off portion which purports to allow residents a voice in whether they support this project. It does not. Under the question, question No. 5, which asks, "Do you support the 2000 Avenue of the Stars revitalization project?," residents have a choice only of 3 answers, "Yes," "List my name as a supporter," or "Keep me informed." There is no option for disagreeing entirely with the project! So if/when the developers present to the Planning Commission these tear-off cards purportedly showing that most residents either agree with or do not oppose this project, keep in mind that *the residents were not given any choice in the matter* on these tear-off cards! Sneaky, but effective! (If you do not have a copy of this flyer, I will be happy to mail you one.)

Thank you for your consideration of my opinion.

Very truly yours,



PAMELA WELLS
Resident adjacent to Century City.