

PUBLIC COMMENTS TO THE NOP

**FRIENDS OF WESTWOOD, INC.  
WILSHIRE GLENDON ASSOCIATES  
CENTER WEST, LIMITED**

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Via Fax 213-580-5542

December 4, 2000

Ed Reyes  
Environmental Review Section  
Los Angeles City Planning Department  
221 N. Figueroa St.  
Los Angeles, CA 90012

**Re: EIR 2000-3213 Notice of Preparation Palazzo Westwood**

Dear Mr. Reyes:

Thank you for the opportunity to respond on the Notice of Preparation for Palazzo Westwood. This letter is in behalf of Friends of Westwood, Inc., Center West, Limited, and Wilshire Glendon Associates.

**Amending Specific Plan:** The Specific Plan is now eleven years old. It is not appropriate to amend the plan for a single project, but rather, to prepare a plan-area EIR and identify changes that benefit all stakeholders, not just this applicant.

***The applicant has not shown why he cannot build within the envelope permitted by the plan, which is twice the buildable allowed under Prop U.***

**Please provide a baseline of entitlements under the plan, before showing the requested entitlements.** In other words, what the applicant is entitled to by right, and what additional entitlements he is seeking. In instances where additional entitlements are being requested, please indicate the public benefit.

**Acreage:** 4.98 acres is not accurate. Our calculation is approximately 4 acres. Please correct this figure. I had pointed this out in my earlier letter (October 31, 2000) and it was not corrected. The density permitted on this property should be reduced accordingly.

**Glendon Manor:** Since 1989, when the Westwood Village Specific Plan was adopted the State of California provided a method whereby local groups could nominate a building to the State Cultural Heritage Commission. This was done successfully by Save Westwood Village and Friends of Westwood more than two years ago.

**FRIENDS OF WESTWOOD, CENTER WEST, WILSHIRE GLENDON ASSOC.**

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This is not a delay tactic: two developers would like to buy and restore this historic building. **Please provide a mitigation measure of offering this building for sale at fair market value so that it can be preserved.**

**Please provide an alternative project that has Glendon Manor preserved and respects the height restrictions for buildings adjacent to cultural resources.**

Thus there is now more than one way to be designated a cultural resource, and this is not reflected in the current specific plan.

*Please note that the destruction of a cultural resource within Westwood Village denies the applicant the right to a subsurface vacation, something that he is requesting.*

**Density:** Please state what the permitted density is under the plan. What percent increase is 350 units? The application states some units would be as small as 750 square feet. This would violate the R-3 density Q condition for Westwood Village which requires a minimum of 800 square feet per unit.

Would the requested density constitute R-4 or R-5 density?

Please state base density and then the density granted for bonus with mixed-use projects and any other bonuses.

Contrary to recent statements made by Mr. Casden in the Los Angeles Business Journal, there was never a plan for high density housing in the Village, only in the Wilshire Corridor. **There is still the highest density permitted in the City in the Wilshire Corridor of Westwood.** Indeed, there is considerable high density housing currently under construction in the Westwood Wilshire Scenic Corridor.

The Village Specific Plan was designed to preserve the Village as a low-rise, pedestrian oriented. Until 1989 there was no height limit for the Village. This height limit was agreed to by all parties: the City, UCLA, LABC, community groups, and property owners.

**Affordable Housing:** There is a dearth of affordable housing on the Westside. It does not make sense to demolish existing housing (Glendon Manor, 42 units).

The applicant does not indicate if any of the proposed housing is to be affordable.

**Glendon Avenue:** Wide (17 foot) sidewalks are commendable if they come from the applicant's property, not Glendon. Please analyze the following impacts of reducing

## **FRIENDS OF WESTWOOD, CENTER WEST, WILSHIRE GLENDON ASSOC.**

**3.**

Glendon Avenue by 50 percent:

- What is the impact in additional buildable creating the sidewalks from Glendon Avenue in terms of square footage and percent of additional buildable?
- How many on-street parking spaces are lost?
- How much revenue is lost to the parking meter district?
- What is the impact on ingress and egress for the Macy's and Arden Buildings?
- What are the impacts on the circulation system of the Village?
- This constitutes a partial vacation of Glendon Avenue. What are the liability and damage consequences for this vacation under the State Law (Streets and Highways)? Further, what is the liability for the city?
- Is notice of this action being sent to all property and business owners within the original tract map?

**Subsurface Vacation:** Are the rights of property owners in the Village impaired or altered through a subsurface vacation?

- Do they have the right to notice of this proposal, starting from the Notice of Preparation?
- Did they receive notice of the NOP, and have they been apprized of their rights by the city?
- Does the city have the authority to grant this subsurface vacation without the permission of business and property owners within the original tract map?
- What liability does this action create for the city?
- What damages are property owners entitled to for this action?

**Retail Element and Bonuses:** Since Ralphs Market is going into the Macy's building, it would appear that the applicant is not entitled to a bonus for a market. For this reason, a new project alternative needs to be developed without a retail element on the east-side. There should be many benefits: height limit compliance, far less expensive parking, etc.

**Corner Retail Ordinance:** this ordinance specifically protects adjacent residential properties from overly tall structures or long hours of operation. The height limit under this ordinance is 40 feet, rather than 45 feet along Tiverton. Please provide an alternative project that conforms with this law as well.

It is not clear how much retail is on the east or westside of Glendon Avenue.

**Street Tree Removal:** please provide replacement trees of equal size as a mitigation measure.

**FRIENDS OF WESTWOOD, CENTER WEST, WILSHIRE GLENDON ASSOC.**

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**Setbacks:** The required setbacks along Tiverton provide a buffer for the adjacent residential properties and maintain the residential character of Tiverton Avenue. Likewise, the stepped-back requirement for structures over 40 feet is intended to provide a pedestrian-friendly ambience, not big boxy structures.

- How much additional buildable is created by eliminating the setback?

Contrary to the application, structures are permitted above 40 feet, *if they step back*. Further, since Glendon Manor is a five story building, there is no problem in a 55 foot building dwarfing it.

A solid wall on the Tiverton frontage, even with the setback, is not in keeping with the residential nature of Tiverton Avenue. It should be an articulated surface, and have no commercial intrusion. Also, it appears from the plot plan (of very poor quality to decipher) that there may be commercial access to the site from Tiverton (a staircase). No commercial access means no commercial access. Is this an error?

**An alternative project should include structures that obey the required step-back above 40 feet.**

**Traffic:** the traffic analysis needs to include an updated figure for UCLA that reflects new developments on and off campus (i.e., include Village tenancy). Do not rely on the old Long Range Development Plan figures, which are out of date.

**Correspondence should be sent to:**

Friends of Westwood, Inc.  
1015 Gayley Ave., #1063  
Los Angeles, CA 90024

Phone 310-470-4522  
Fax 310-470-9944  
E-mail: lake4counci@hotmail.com

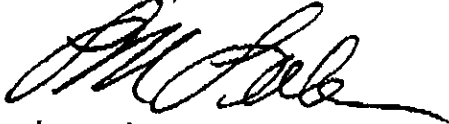
Center West, Limited and Wilshire Glendon Associates  
10877 Wilshire Boulevard, Third Floor  
Los Angeles, CA 90024

Phone 310-824-3000  
Fax 310-824-2424  
E-mail: indivestinc@aol.com

**FRIENDS OF WESTWOOD, CENTER WEST, WILSHIRE GLENDON ASSOC.**

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Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Lake', with a stylized, flowing script.

Laura Lake, Ph.D.

President

Friends of Westwood, Inc.

**FRIENDS OF WESTWOOD, INC.**

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**REVISED NOP COMMENT**

Via Fax 213-580-5542

December 4, 2000

Ed Reyes  
Environmental Review Section  
Los Angeles City Planning Department  
221 N. Figueroa St.  
Los Angeles, CA 90012

**Re: EIR 2000-3213 Notice of Preparation Palazzo Westwood**

This letter amends the earlier submission today to clarify the basis of including Center West, Ltd. And Wilshire Glendon Associates in the NOP comments. These entities wish to go on record in opposing only the issues associated with the narrowing of Glendon Avenue.

Thank you,



Laura Lake, Ph.D.  
President  
FRIENDS OF WESTWOOD, INC.

Phone: 310-470-4522  
FAX: 310-470-9944  
E-mail: lake4council@hotmail.com

1015 Gayley Ave., PMB 1063, L.A., CA 90024

**FRIENDS OF WESTWOOD, INC.  
WILSHIRE GLENDON ASSOCIATES  
CENTER WEST, LIMITED  
ARDEN REALTY**

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Via Fax 213-580-5542

December 4, 2000

Ed Reyes  
Environmental Review Section  
Los Angeles City Planning Department  
221 N. Figueroa St.  
Los Angeles, CA 90012

**Re: EIR 2000-3213 Notice of Preparation Palazzo Westwood**

This letter is to amend the earlier submission today, to include Arden Realty in its objection to narrowing Glendon Avenue. Please send correspondence on this to:

Bart Porter  
Arden Realty  
11601 Wilshire Boulevard  
Los Angeles, CA 90025

Thank you,



Laura Lake, Ph.D.  
President  
FRIENDS OF WESTWOOD, INC.



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# SAVE WESTWOOD VILLAGE

*Dedicated to Quality Revitalization*

December 4, 2000

Mr. Ed Reyes

221 N. Figueroa St., Room 1500  
 Los Angeles, CA 90012

Re: Palazzo Westwood  
 EIR No. 2000-3213  
Response to NOP

Dear Mr. Reyes:

We are making the following comments, under protest, to the NOP for the above project. We submit these without in any way waiving our objections, and we hereby reiterate our previous objections to continuation of the NOP and EIR process for this project at this time. A copy of my letter to you dated November 30, 2000 is attached and incorporated herein by this reference.

**A. Pre-existing Project.** For the reasons set forth in my enclosed letter of November 30, 2000, this NOP and entire EIR process should be suspended, withdrawn or otherwise terminated until such time as (a) the pre-existing project on this very same property (including all of its numerous aspects) is formally withdrawn or otherwise terminated; and (b) we receive timely notice of all matters regarding this property.

**B. No Notice.** Although we are an appellant of record on various pending appeals on the pre-existing project on this very same property and have also received notices from the City on the pre-existing project in the past, we did not receive the NOP for this project, but had to learn about it "through the grapevine."

**C. Time Duress.** I received materials on this NOP by fax from you on Friday. We were given only one business day to review this material.

**D. Incomplete Material.** Upon reviewing the 10 pages of materials you faxed me on Friday, it is apparent on its face that this is not a complete copy of the relevant materials. In particular, missing are the original Notice of Preparation referred to on the first page of the

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 David Zucker  
 (partial listing)

1093 Broxton Ave., Box 620, L. A., CA 90024 Phone/Fax (310) 358-7622

fax, as well as the Attachments described as "Vicinity Map, Radius Map, Site Plan."

Subject to the above objections, all of which are hereby preserved, we submit the following comments:

1. **Acreage.** The property is described as 4.98 acres. This presents the same issue as the pre-existing project, and is not accurate unless all of Glendon Avenue is included. The actual property owned by the developers is approximately 4 acres, not approximately 5 acres as is being represented.

- a. Please ensure that the acreage is measured and described accurately.
- b. Is Glendon Avenue or any portion of public right of way (e.g., sidewalks) being included in the acreage calculation for this project?
- c. What amount of acreage are the FAR calculations based on?
- d. What is the true permitted buildable for this property, using only the land owned by the developers, and calculating it strictly under the existing Specific Plan and other applicable laws, including corner commercial, taking into account permitted height, setbacks, minimum apartment sizes, etc.?

2. **Street Vacation.** The project involves at least two partial vacations of Glendon Avenue: approximately half the surface, and the entire subsurface.

This raises a similar issue to that involved in the pre-existing project. Under California Streets & Highways §8353, private easements are owned by all properties in the original subdivision tract map and are not extinguished by vacation of the public easement. Owners have up to two years to record notices of non-extinguishment with the county recorder.

Under Danielson v. Sykes, 157 Cal. 686 (1910), this private easement extends to all streets in the subdivision, not just those abutting particular lots.

Under Norcross v. Adams, 263 C.A.2d 362, 365, 367 (1968), the city may also be liable.

When this issue came up in the pre-existing project, approximately 1,600 potential claimants for damages were identified.

- a. What are the legal and economic consequences of a proposed partial street vacation, especially the city's possible economic liability?

b. How will the project be impacted if notices of non-extinguishment cloud title of the property?

c. How much extra buildable does the developer get by such a vacation?

d. With respect to the subsurface vacation, what are the consequences to surrounding property and business owners during the construction period -- the new tenants scheduled to open in the Macy's building in the fall 2001 (including Expo Design Center, Ralph's Fresh Fare Market which have been formally announced, and also possibly Long's Drugstore and Bed Bath & Beyond in negotiations), the recently renovated Arden building which is now almost fully leased, the other smaller businesses along Glendon, emergency vehicle access to the UCLA hospital and the Westwood Horizons retirement community?

e. How will a narrowed Glendon Ave. impact traffic circulation in the Village, especially with regard to the anticipated impact of the new multi-tenant retail at the Macy's building, the filling up of the Arden building, the completion of the Legacy Apartments on Wilshire just east of Glendon and the various other large multi-family projects under construction in the Wilshire Corridor, and emergency vehicle access to the hospital and Westwood Horizons retirement community?

f. How will the existence of a subsurface garage affect the ability of emergency vehicles, trucks and other traffic to traverse Glendon Ave.? This was also an issue in the pre-existing project -- when the street was to be replaced over the subsurface garage, it was not going to be strong enough to carry such vehicles. The same issue has arisen in Pasadena, where the old mall on Colorado Blvd. is being torn down -- the street over the subterranean garage is not strong enough to handle regular traffic.

3. **Glendon Manor Historic Building.** This project proposes to demolish the apartment building at 1070 Glendon Avenue. This building was declared historic by the State in 1998 after voluminous hearings and proceedings at which the developers were abundantly represented. Glendon Manor was built in 1929. It is one of only twelve original buildings remaining in the Westwood Specific Plan area, and as evidenced by provisions in its original grant deed and contemporaneous press articles, is closely associated with the opening of the UCLA campus here in that same year.

We are enclosing copies of the State's notice of determination, minutes of the hearing (excluding attachments other than Glendon Manor) at which that determination was made, and formal findings of fact determined after a second hearing.

a. What alternatives are there to demolishing this historic structure? It is, after all, residential property and the proposed project is primarily residential. Why not incorporate this building into the project?

b. Include as an alternative and/or required mitigation that this building must be rehabilitated and incorporated into the residential portion of the project. As a state-designated historic building, it qualifies for a more lenient building code and various tax breaks.

c. Include as an alternative and/or mitigation that this building must be offered for sale to those who would preserve it.

d. We understand that the building currently houses seniors and/or disabled and/or low income tenants. What is the impact of demolishing this type of affordable housing in Westwood?

e. As an historic building, what other impacts does this have on the proposed project -- e.g., height restrictions, setback requirements, subsurface vacation restrictions.

**4. Relationship with Pre-Existing Project.** A tract map was approved for the pre-existing project that includes among other things the vacation of Glendon Avenue, re-draws lot lines on the eastern half of this very same property and creates commercial condominiums, which is currently on appeal. In addition, numerous other approvals were given for various matters in connection with the pre-existing project (including, e.g., use of the State Pedestrian Mall Law for Glendon Avenue which conflicted with the approved street vacation), some of which are also currently on appeal, and others for which no written notice of determination was ever sent so appeal time not triggered.

a. What exactly is the status of pre-existing project and each of the decisions, determinations and approvals made in connection therewith?

b. What part, if any, of the approvals for the pre-existing project might be used for this project?

c. Will formal withdrawal or termination of the pre-existing project (and all of its numerous aspects) be a condition of this project going forward?

**5. Parking.** The developers claim that their proposed parking meets the requirements of both the Specific Plan and Municipal Code.

a. Provide a clear, unambiguous and detailed description of how this conclusion is reached, i.e., detailed calculations of required parking.

b. How many of the 1,550 proposed spaces are reserved for residential use, and how many for retail use?

c. How many spaces are replacements for the currently available public parking on the site -- note that the vast majority of the property consists of surface parking lots available for public parking.

d. How many spaces are replacements for the lost on-street parking?

e. Exactly how much on-street parking will be lost -- e.g., by the narrowing of Glendon Avenue, and along Tiverton and Weyburn?

f. How many spaces are replacements for covenanted parking on the existing lots?

g. Will the retail parking be available for use by customers Village-wide, or only for customers of businesses on site?

h. Will the retail parking provide 2-hour free parking or otherwise be part of a Village-wide validation system?

6. Amendment of Specific Plan. The Specific Plan was carefully researched and negotiated among all the various Westwood constituencies over a period of several years -- businesses, property owners (specifically including the active participation of the developers' predecessors in interest on this very property), homeowners, UCLA, etc. The final result was based on a fully integrated view of the Village as a whole, and involved numerous negotiated compromises by all parties.

a. Why can't the developers, who knew the terms of the Specific Plan before they acquired the property, build within the Specific Plan? If they didn't think they could profitably do so, then they shouldn't have acquired the property.

b. The alternatives must include a project that substantially complies with the Specific Plan, and does not require amendments of the Plan.

c. The Specific Plan cannot be amended for the benefit of one project. What is the impact on all the other property owners who don't get such special treatment?

d. The Specific Plan cannot be amended on the basis of a project EIR. The EIR for the Specific Plan itself is more than ten years old. If amendments are contemplated, then the entire Specific Plan area should be looked at comprehensively, as an integrated whole in light of current circumstances (including, e.g., the State historic designation of Glendon Manor, increased traffic, new development at UCLA and in Wilshire Corridor), and a new Specific Plan EIR should be prepared involving all the various constituencies.

e. Provide the specific language for the proposed Specific Plan amendments as part of the EIR, rather than springing them on the public a few days before public hearings as was done with the pre-existing project.

**7. Tract Map and other Approvals.**

a. Are there any tract map approvals involved in this project? If so, specify what they are in detail.

b. Specify in precise, clear and unambiguous detail all other approvals that are required or being sought, e.g., conditional use permits, liquor licenses, etc. -- how many, in what locations, on-site, off-site, entertainment, number, types and sizes of restaurants, etc.

c. Specify details on "lot tie agreement," and density transfers.

d. What signage variances are contemplated -- for what businesses, what kinds of signs, etc.

**8. Variances/Exceptions.** Does this project qualify for any variances or exceptions under the existing legal standards for such determinations? If so, what are they? If not, why not?

**9. Buildable/Density Calculations.** We understand that the proposed number of apartments is approximately 150% more density than the developers are entitled to under the existing law.

a. Provide a detailed description and calculation of what buildable the developers are entitled to under the Specific Plan and other applicable laws, including corner commercial.

b. Specify exactly what bonuses the developer is relying on, e.g., neighborhood serving uses, residential above commercial, density transfers (and from where), etc., and how much additional square footage is gained for each.

c. How does the actual proposal differ from what they are entitled to under existing law?

d. What is the minimum square footage size for apartments under existing law?

e. How are proposed tenant amenities, e.g., pool, healthclub, gardens, factored into the calculations?

**10. Commercial Encroachment.** The Specific Plan requires the lots fronting on Tiverton to be residential if a hotel is not built. What are the impacts of permitting commercial use (even though no commercial access, there will apparently be a blank wall at street level) on this small, primarily residential street? How will it affect the value of nearby residential

properties? What possible justification for such encroachment, especially as a Ralph's grocery is definitely not going into this project.

**11. Grocery Store.** A full-service Ralph's Fresh Fare Market is now going into the Macy's building across the street from this project, as announced publicly on November 30, 2000. Apparently, the developers of Palazzo Westwood were hoping that Ralph's would come into their project, which is now clearly not going to happen.

a. What business will go into the space designated for a grocery store? Will it be a grocery or something else? If a grocery, which one?

b. How do you realistically protect against granting bonuses for something that may not actually happen, or that changes a year or so after being built, as happened when Irvine Ranch Market went out of the project at Moraga and Sepulveda, which is now used for offices instead of being neighborhood-serving?

**12. Height/Setbacks.** What justification is there for permitting excess height or reduced setbacks for this project, and/or for re-defining how height or setbacks are measured for this project? Why can't the developer build within the height and setbacks provided under the Specific Plan, which were specifically designated in order to preserve the low-rise, small-scale Village atmosphere against encroachment by high-rises such as the Arden building (ironically being cited by the developer as an ostensible reason for such redefinitions).

**13. Affordable Housing/Public Amenities/Public Access.**

a. Is there any affordable housing/low income housing being provided in this project?

b. Are any public amenities being provided in this project?

c. Will there be a public access through the middle of the block between Tiverton Ave. and Glendon Ave., and between Glendon Ave. and Westwood Blvd.?

**14. Bicycle Spaces.** The proposed project is exactly the type of project where more rather than less bicycle spaces should be provided -- bicycles are a perfect means for residents in the 350 units of the project to get around the Village and nearby UCLA campus. What justifications are there for lowering the number of bicycle spaces?

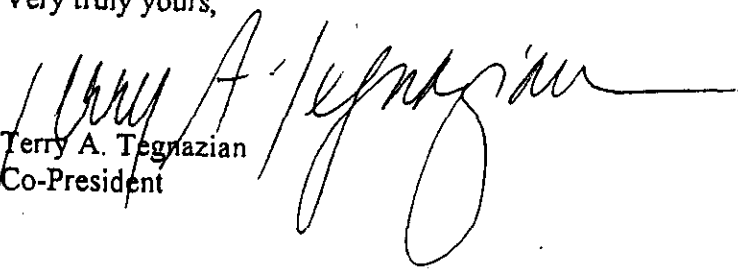
**15. Traffic.** Conduct all new traffic studies. Assume full occupancy of surrounding buildings, including all the high-rise office buildings and the apartments and condos in the Wilshire Corridor, and full occupancy of the retail space in the Village, especially with the new multi-tenant retail uses coming online in the Macy's building. In addition, in calculating traffic from UCLA, do not simply extrapolate from projections in the long-range development plan which is what was done for the pre-existing project -- take into account UCLA's occupancy in the Village as well as on campus, the new grad student housing being

Mr. Ed Reyes  
Re: Palazzo Westwood  
December 4, 2000  
Page 8

built on Veteran south of Strathmore with provisions for another 2,400 cars, the new hospital,  
the new extension school in the Gap building, etc.

Please call me directly at 310-470-0770 if you have any questions. Thank you.

Very truly yours,

  
Terry A. Tegnazian  
Co-President

enc.



**METCALFE ASSOCIATES**

**Urban Design**

**Development Planning**

1421 Pandora Avenue

Los Angeles, CA 90024

Tele/Fax: (310) 474-6418

**Michael S. Metcalfe**

Principal

November 27, 2000

FAX Letter: (213) 580-5542

Mr. Ed Reyes and/or Mr. Jimmy Liao, Project Coordinator

Los Angeles Department of City Planning

221 North Figueroa Street, Suite 1500

Los Angeles, CA 90012

**RE: EIR No. 2000-3213; Palazzo Westwood**

Dear Sirs:

I am writing to register my concerns regarding the urban design and planning proposition of the Palazzo Westwood project.

The Applicant has requested amendments to the Westwood Village Specific Plan (WVSP) which are proposed to benefit the Applicant's development interests, but are antithetical to the best interests of the community. Each of the Applicant's requested amendments can only be approved at the expense of the public realm. Such proposed amendments represent an unfortunate process that has been characterized as "the piecemeal privatization of the public realm." The developer's request combined with the proposed demolition of an important, original part of the urban fabric of the Village, Glendon Manor, is wholly unacceptable. (Please refer to the attached correspondence regarding the historic preservation of Glendon Manor.)

The Applicant is attempting to change the legally adopted WVSP (City ordinance and development regulations for dwelling unit density, setbacks, street width and capacity, and height limits), to suit his project. It seems that this approach is backward. I submit that the developer should first provide an explanation of why his project should not be adjusted to suit the legally established regulations of the WVSP.

The WVSP is designed to preserve public open space resources in the form of dwelling unit density limitations, frontage setbacks on Tiverton, and the width of the public right-of-way of Glendon Avenue. The WVSP is also designed to preserve the historic character and architectural integrity of the Village. Please review the preamble of the WVSP, under SUMMARY OF PROVISIONS, which describes the Specific Plan's general intent, stipulating the following on WVSP Page 1-1:

*"To permit, encourage and facilitate the preservation, renovation and ongoing maintenance of historically and architecturally significant buildings."*

Does the developer also propose to amend the WVSP to remove this statement of intent ?

I am opposed to any amendment to the Westwood Village Specific Plan (WVSP) for the exclusive purpose of facilitating this otherwise non-conforming project. I assisted in development of the WVSP. I recall that it took approximately seven (7) years of protracted negotiations among multiple competing interests and stakeholders to finalize and approve. Why should such an achievement as the WVSP, and so much difficult community planning effort be summarily overturned to suit the financial objectives of this one developer ? Also, the proposal for a 60,000 sq. ft. supermarket does not make sense in light of the enclosed press release for the old Macy's Westwood building, directly across the street. Please see the following news item from the LABJ. Two markets so co-located is not functionally feasible in terms of land use.

My family and I have been residents of Westwood for more than 33 years. I am an architectural designer and an urban design and planning consultant (M. Arch. Urban Design, UCLA/GSAUP, '70). I am presently practicing as a consultant, serving real estate development advisory firms. My professional background includes more than 25 years of experience with well over 100 urban mixed-use retail/entertainment centers, destination resorts, office parks and other large scale projects completed to date.

I recognize that the WVSP designates higher and better uses for the subject site (designated Subarea 2) which, if developed in conformance with the WVSP, offers the potential to generate greater benefit to the local community, greater revenues to the City, and generate superior economic and physical revitalization benefits Village-wide.

Thank you for your consideration of this important matter.

Sincerely,



Michael S. Metcalfe  
Principal

METCALFE ASSOCIATES  
Urban Design  
Development Planning  
1421 Pandora Avenue  
Los Angeles, CA 90024  
Tele/Fax: (310) 474-6418

Michael S. Metcalfe  
Principal

October 11, 1998

Fax Sacramento: (916) 853-9824

Ms. Jenan Saunders, State Historian  
California State Historical Resources Commission  
1416 Ninth Street, Room 1442-7  
Sacramento, CA 95814

RE: Glendon Manor, 1070 Glendon Avenue, Westwood Village, Los Angeles, CA 90024

Dear Ms. Saunders:

This is to reaffirm our most positive support for the nomination of **GLENDON MANOR** to the California Register of Historical Resources. Please do all that you can to help ensure that this important building at 1070 Glendon Avenue in Westwood Village is properly listed on the California Register of Historical Resources when it comes before the State Historical Resources Commission on November 13, 1998 in Modesto.

This building should absolutely be preserved, both for its rich Historical Resource value as well as its future urban design role in the emerging economic revitalization of Westwood Village. While the majority of Glendon Manor's important historic and architectural merits are documented in the nomination materials officially submitted by Portia Lee, Ph.D., and in the letters of support for the nomination from WESTWOOD-HOLMBY HISTORICAL SOCIETY, SAVE WESTWOOD VILLAGE, FRIENDS OF WESTWOOD, SOCIETY OF ARCHITECTURAL HISTORIANS (SAH / SCC), and others, there are some additional supporting points which we would ask the Commission to please consider:

1. The above referenced FRIENDS OF WESTWOOD letter of Oct. 9, 1998 includes a copy of the Westwood Village Specific Plan (WVSP) for your reference and the SAH / SCC letter of June 10, 1998 cites the preamble of the WVSP, under SUMMARY OF PROVISIONS, which describes the Specific Plan's general intent, stipulating the following on WVSP Page 1-1:

*"To permit, encourage and facilitate the preservation, renovation and ongoing maintenance of historically and architecturally significant buildings."*

Note that the WVSP was adopted by the Los Angeles City Council as City Ordinance No. 164,305 Effective January 30, 1989, which remains in force today as the *community-based*, applicable city law.

Therefore, the State Historical Resources Commission decision to list **GLENDON MANOR** on the State Register will uphold and conform with the spirit and intent of applicable law.

2. Glendon Manor has a superb potential continuing role to play in the future cultural and economic life of Westwood Village. Unlike the current developer's proposal to demolish Glendon Manor, the adopted WVSP actually designates a superior, highest and best use strategy for the subject site area. The WVSP provides bonus incentives (transfer of development rights) to encourage adaptive re-use and preservation of Glendon Manor as a part of a larger, up-scale hotel and mixed-use development in conformance with the WVSP. (For example, see WVSP Section 7. Building Intensity, B. Additional Permitted Floor Area, item 6., Page 4-6.) A restored and up-graded Glendon Manor would provide an historic focus of place, identity and address at the existing Glendon Avenue frontage, as a part of a larger "garden" destination hotel complex. (Such a facility would be oriented to providing up-scale lodging accommodations for visitors, guests, and longer term residents of the UCLA / Getty Institute, and greater Westwood vicinity lodging market which is presently underserved.)

3. Thus, the decision to list Glendon Manor on the State Register of Historical Resources will conform with existing Westwood Village historic preservation law and, at the same time, provide an immeasurably positive step toward historic and economic revitalization of a State treasure, Westwood Village.

Thank you for your consideration of this important historic preservation opportunity.

Sincerely,

  
Michael S. Metcalfe, Co-president  
Save Westwood Village

## Dealmakers

## Port Posts Record Month

Spurred by a tsunami of Asian-made consumer goods arriving for the holiday shopping season, the Port of Los Angeles set a new single-month record in October by taking in nearly 251,000 import containers, beating last October's total by 26 percent.

In a sign that Asia is recovering nicely from its 1997 financial meltdown, the port also set a new single-month record for exports, largely consisting of raw materials bound for Asian manufacturers. October's outbound volume of about 94,000 containers topped last year's count by 24 percent.

In total, the port handled 481,502 20-foot containers in October, also a single-month record. But nearly a third of those were empty containers shipped back to Asia so they could be filled with more consumer goods.

## Earthlink Gets Cable Access

Under pressure from government regulators, merger partners America Online Inc. and Time Warner Inc. said they have cut a deal with Earthlink Network Inc. - AOL's chief rival - to deliver high-speed Internet access across Time Warner's cable wires.

The contract, set to take effect next year, is considered pivotal to winning government approval for the AOL-Time Warner deal. The agreement also could serve as a model for other cable networks in leasing their wires to unaffiliated Internet companies.

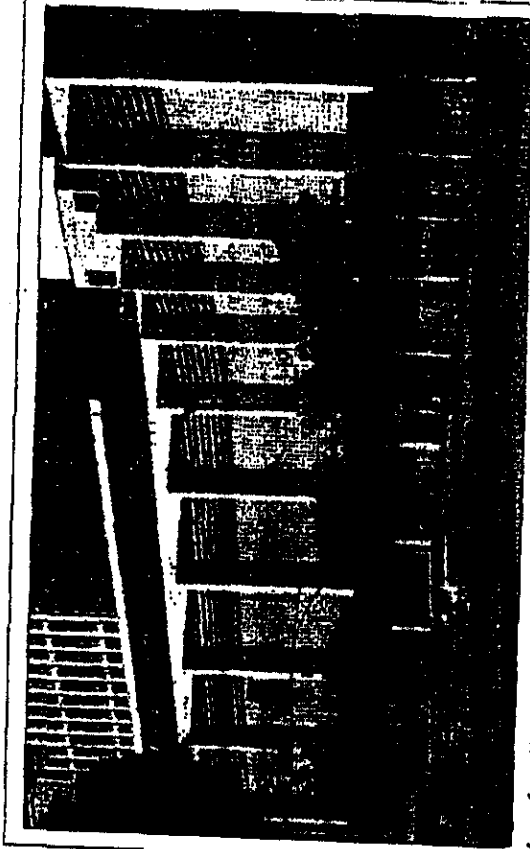
Federal Trade Commission officials are expected to review the terms of the Earthlink contract and announce a decision on the merger by Dec. 11, extending the previously set Nov. 30 deadline.

AOL and Time Warner officials now say they might not complete the deal until January, slightly longer than expected and a year after it was first announced.

## Moelis Joins Warburg

Ken Moelis, one of Southern California's top investment bankers, is leaving the newly merged Credit Suisse First Boston for a far smaller banking firm, UBS Warburg.

The move comes just a few weeks after CSFB completed its purchase of Donaldson, Lufkin & Jenrette Securities Corp., where Moelis had been the star banker in L.A. since the early 1990s.



Leasing: New uses planned for Macy's department store building.

## Westwood Village Getting Retail Tenants

Months after purchasing the former Macy's department store building in Westwood Village, Cincinnati-based Madison Marquette is expected to announce this week that it has signed Home Depot-owned EXPO Design Center and a Ralphs Fresh Fare supermarket as major tenants, according to informed sources.

Madison Marquette bought the 225,000-square-foot building at 10861 Weyburn Ave. from Federated Department Stores Inc. in March. The building is the largest retail structure in Westwood Village and was built in 1951.

Two months ago, residents lobbying for a grocery store threatened to protest after a Ralphs official took the unusual step of calling activists to say that Ralphs wanted to be a tenant in the project but was meeting resistance from Madison Marquette. Those residents were pleased to learn of the tenant agreements.

"I think it will be well-received by the residents of the Westwood area," said Sandy Brown, president of the Holmby-Westwood Property Owners Association.

CSFB had given Moelis, 42, the title of co-head of investment banking - a high-profile post - as part of its \$11.5-billion purchase of DLJ.

Moelis, who managed a team of about 110 bankers at DLJ, is expected to take a large number of those bankers with him to UBS.

## CRA Investigated

Alarmed by allegations of financial improprieties in the Los Angeles Community Redevelopment Agency, interim administrator Jerry Scharlin hired a private detective firm to investigate agency operations.

The private investigators' work has been turned over to the city controller's office and helped set in motion a more detailed audit of agency land transactions that is now underway, Scharlin said.

Agoura-based Discreet Intervention Inc. investigated allegations made to Scharlin by

gain B2bstores.com's assets.

B2bstores.com would issue 20 million shares of common stock to Ivax in exchange for outstanding shares of Ivax Diagnostics. If the deal closes, Ivax Diagnostics would purchase B2bstores.com and parent Ivax would end up with 68 percent of the combined company's equity.

## Layoffs Made at CarsDirect

CarsDirect.com dismissed 90 of its 750 employees, raising the tally of e-commerce layoffs.

Officials of the Culver City company, which processes and fills online orders for cars, said technological improvements made the positions unnecessary. The layoffs affect 12 percent of CarsDirect.com's workforce.

Co-founded by Pasadena incubator Idealab, CarsDirect.com is among the region's largest venture-backed e-commerce companies.

CarsDirect.com fills orders by acquiring vehicles from dealers and selling them to online shoppers. In the quarter that ended in March, the best period for which the company has provided financial information, the average cost of cars procured by CarsDirect.com exceeded what consumers paid for them.

## Disney Sells DIC

Walt Disney Co. agreed to sell DIC Entertainment to the unit's chief executive, Andy Heyward, and Boston-based investment firm Bain Capital Inc.

Terms weren't disclosed. DIC, known for such characters as Inspector Gadget, Madeline and Sonic the Hedgehog, will continue to have a relationship with Disney.

Burbank-based Disney has ordered 26 new episodes of "Madeline" for cable TV's Disney Channel.

## Kodak Theatre Gets Manager

The developers and operators of Staples Center in downtown Los Angeles have been hired to manage the new 4,000-seat theater that will serve as the permanent home for the Academy Awards show in Hollywood.

Anschutz Entertainment Group will manage the Kodak Theatre as part of a partnership formed with Canadian developer TrizecHahn Development Corp., which is building the theater as part of the \$567 million Hollywood & Highland project. Anschutz will receive a portion of the theater's revenue, but officials would not disclose financial details of the partnership.

The theater, which is scheduled to host its first Academy Awards ceremony in 2002, will feature more than 100 events in its first year of operation.

## B2bstores.com Acquired

Generic drug maker Ivax Corp. said it has entered into a definitive agreement to acquire Long Beach-based business-to-business company B2bstores.com for an undisclosed amount. The deal is being undertaken as part of Ivax's plan to take its Ivax Diagnostics unit public.

The Web operations of B2bstores.com, which laid off employees and slashed spending in August, are to be discontinued. Ivax would

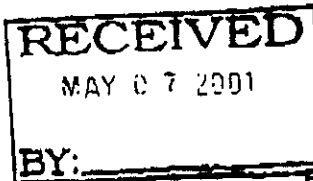
employees when he took over the agency 15 months ago, Scharlin said.

The City Council recently called for an investigation of the agency after the city's director of auditing, Jim Armstrong, said a pending audit found transactions in which the agency had purchased properties at prices different than the appraised values.

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PUBLIC COMMENTS TO THE NOTICE OF PROPOSED  
STREET VACATION

ELLEN STEIN  
PRESIDENTVALERIE LYNNE SHAW  
VICE-PRESIDENTMARIBEL MARIN  
PRESIDENT PRO-TEMTOD A. BURNETT  
WOODY FLEMINGJAMES A. GIBSON  
SECRETARYCITY OF LOS ANGELES  
CALIFORNIARICHARD J. RIORDAN  
MAYORDEPARTMENT OF  
PUBLIC WORKS  
BUREAU OF  
ENGINEERINGVITALY B. TROYAN, P.E.  
CITY ENGINEER650 SOUTH SPRING ST., SUITE 200  
LOS ANGELES, CA 90014-1011

APR 18 2001

Westwood Center (WATA)  
c/o Deloitte & Touche LLP  
P.O. Box 188156  
Carlsbad, CA 92008Glendon Ave. (Por/o) bet.  
Weyburn Ave. & Kinross Ave.  
(Subsurface Vac.) -  
VAC-E1400741.6-7-01  
15  
50 DAYS

## NOTICE OF PROPOSED VACATION

This office has been requested to investigate the vacation of the public right of way indicated below pursuant to an investigation fee paid under Section 7.42 of the Administrative Code:

(x) A request for the vacation of the area(s) shown colored blue on the attached map.

( ) Also the vacation of the area colored green.

Referrals have been sent to governmental agencies and public utility companies for their input on the requested vacation. This office does not commence formal investigation until these inputs are received. Therefore, the information available at this time is limited essentially to the area involved.

If you wish to comment on this vacation, you must send your written communication within 50 days of the above date to Gus Dembegiotes of the Street Vacation Investigation Section at 634 S. Spring Street, Suite 400, Los Angeles, CA 90014 or telephone (213) 485-5368.

  
Ronald R. Olive, Manager  
Land Development Group  
Bureau of Engineering

RO/FV/gt

Enc.

APR 27 10:21

ADDRESS ALL COMMUNICATIONS TO THE CITY ENGINEER

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

APPROPRIATE AND REVIEWED BY THE CITY ENGINEER

1-656 P.02/04 F-134

FROM-

MAY-11-01 10:00

APPLICATION FOR VACATION OF PUBLIC RIGHT OF WAY

DATE: Feb. 1, 2001 ORIGINAL - (No copies or faxes)

PROJECT LOCATION AND DESCRIPTION:

- (1) Area proposed to be vacated is: Glendon Avenue  
and is located between: Kinross Avenue and Keyburn Avenue  
(Street/Avenue/Boulevard/alley/walk: N/S/E/W/O) (Street, Avenue, Boulevard or other limit)
- (2) The vacation area lies within or is shown on:  
(a) Engineering District: (check appropriately)  
( ) Central ( ) Harbor ( ) Valley (x) West Los Angeles  
(b) Council District No. 5  
(c) District Map No. 135B 153-631  
(d) Thomas Guide Reference: 632 B3  
(Page No.) (Letter/Number at intersection pt.)
- (3) Area (in sq. ft.) of the proposed vacation area is approx. 34,213 sq. ft.
- (4) Purpose of vacation (future use of vacation area) is: Subsurface vacation  
in order to build subterranean parking garage 4 feet below street  
level
- (5) Vacation is in conjunction with: (Check appropriately)  
( ) Revocable Permit ( ) Tract Map ( ) Parcel Map ( ) Zone Change  
( ) Other

PETITIONER / APPLICANT:

- (6) Petitioner(s): David Mercer - HMK Engineering, Inc.  
Print Name(s) of Petitioner(s) in full - Name or Company Name
- Signature(s): [Signature]  
If Company, Name and Title
- (7) Mailing Address: 24007 Ventura Blvd., Suite 102, Calabasas, CA 91302  
(Address, City, State, Zip Code)
- (8) Daytime phone number of petitioner is: ( 818 ) 222-0301  
FAX number: ( 818 ) 222-1405  
E-mail number: 2220301@MSN.COM
- (9) Petitioner is: (check appropriately) ( ) Owner OR (x) Representative of Owner

OWNERSHIPS:

- (10) Name(s) and address of the Owner(s) applying for vacation is/are:

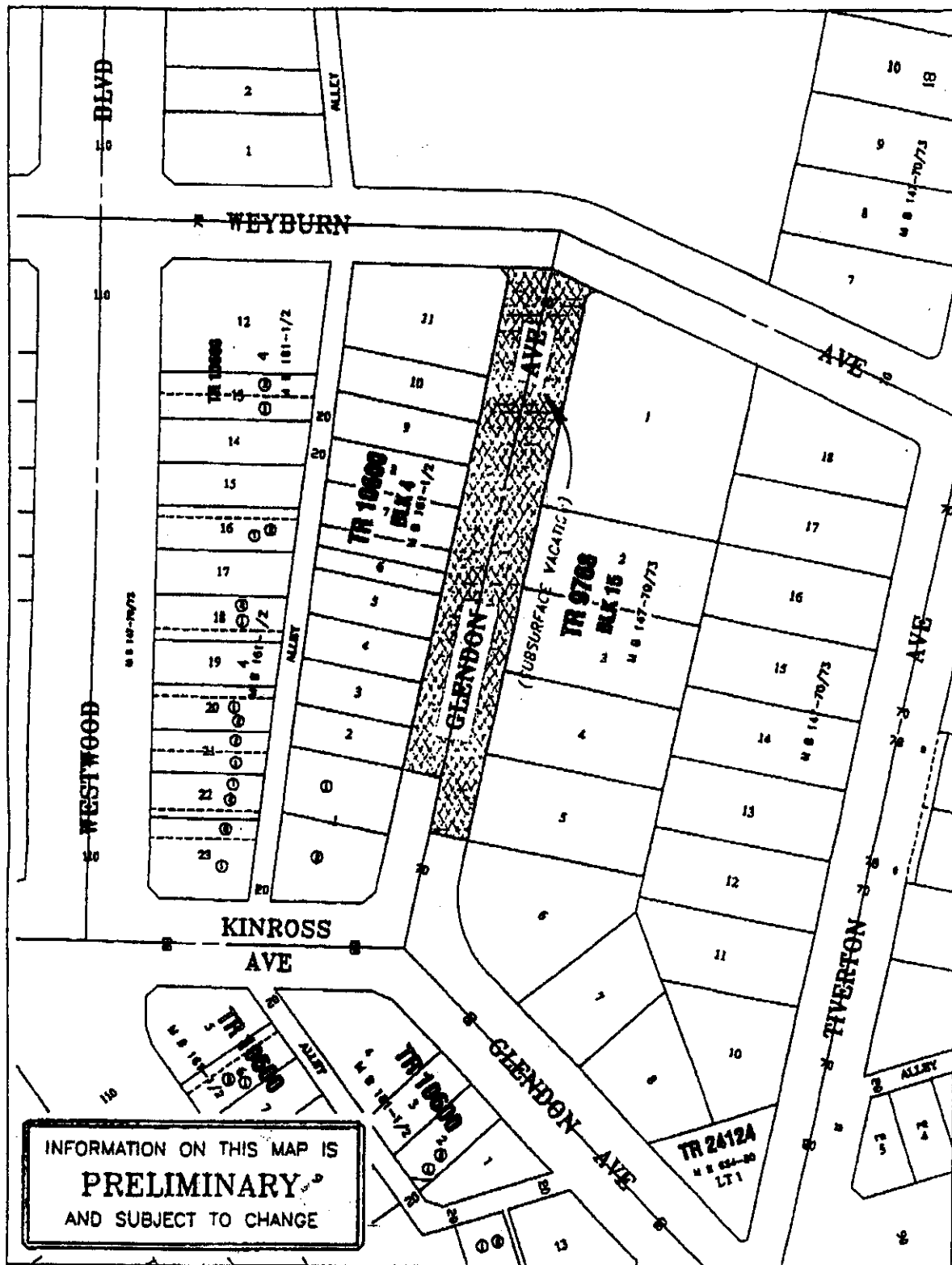
CASDEN GLENDON LLC

9090 Wilshire Blvd., 3rd Floor, Beverly Hills, CA 90211

Ron Mayhew

Print Name(s) and Address of Owner(s) in Full  
(If Owner is Petitioner, Indicate "Same as above")

[Signature] Signature(s)



TITLE: GLENDON AVENUE (PORTION OF) BETWEEN WEYBURN AVENUE  
AND KINROSS AVENUE (SUBSURFACE VACATION)

WORK ORDER NO. VAC- E1400741  
 COUNCIL FILE NO. \_\_\_\_\_  
 COUNCIL DIST. 5 DIV. INDEX 1136  
 ENGR. DIST. W.L.A T.G. 632-B3  
 DISTRICT MAP 132B149 & 132B153  
135B149



CITY OF LOS ANGELES  
 DEPT. OF PUBLIC WORKS

VITALY B. TROYAN  
 CITY ENGINEER

EXHIBIT A



# Westwood Horizons

947 Tiverton Avenue, Los Angeles, CA 90024  
(310) 208-4590 or (800) 218-4590 Fax (310) 208-3068  
E-Mail: [info@westwoodh.com](mailto:info@westwoodh.com) ~ Website: [www.westwoodh.com](http://www.westwoodh.com)  
*Experience the Adventure!*

June 5, 2001

**VIA FAX (213) 847-8272 & MAIL**

Mr. Gus Dembegiotes  
Street Vacation Investigation Section  
Bureau of Engineering  
634 S. Spring Street, Suite 400  
Los Angeles, CA 90014

Re: VAC-E1400741  
Glendon Avenue (Por/o) bet. Weyburn Avenue & Kinross Avenue (Subsurface Vac.)

Dear Mr. Dembegiotes:

This is in response to the City's Notice of Proposed Vacation, dated April 18, 2001, regarding the above proposed subsurface vacation. (We understand from the Notice of Preparation of an EIR that a partial surface vacation of Glendon Avenue will also be required for the proposed project, but have not yet received a notice from your department on that aspect.)

We own property within the Westwood Village tract located at 947 Tiverton Avenue that would be negatively impacted by the proposed subsurface vacation. We have invested many millions of dollars in our own property on the assumption that Glendon Avenue would be available for use without interruption. We object to the proposed vacation, which would be highly detrimental to the already restricted circulation in Westwood Village.

We are also concerned that the application requests a subsurface vacation beginning only 4 feet below the surface. In the predecessor project to this one, the subsurface vacations began 10 feet below the surface, which would seem to be the minimum necessary. In addition, our property, Westwood Horizons, located at the northwest corner of Weyburn and Tiverton with its westerly boundary immediately contiguous with the eastern boundary of the old Macy's property. Glendon Avenue is the closest north/south intersection to the west of our property. Westwood Horizons is a building that has for the past 27 years maintained a "Senior Citizen" residential facility. There are usually 250 residents in the facility with an average age of 87. Unfortunately, Westwood Horizons is visited almost daily by emergency vehicles, ambulances, fire department rescue units. Glendon Avenue is the only two way north/south street immediately available for such vehicular ingress and egress. Any diminution in the present use of Glendon would have a serious impact upon the health and safety of our senior residents.

Under California Streets & Highways Code ("SHC") §8353(b), each owner within a tract has a private easement over the streets shown on the tract map, which is not extinguished by the city's vacation of the public easement. The definition of "street" under SHC §8308 includes all rights connected therewith, e.g., subsurface as well as surface.



Mr. Gus Dembegiotes  
June 5, 2001  
Page 2

Under Danielson v. Sykes, 157 Cal. 686 (1910), this private easement extends to *all streets in the subdivision*, not just streets abutting the lot. Under Norcross v. Adams, 263 C.A.2d 362, 365, 367 (1968), the government entity may also be liable.

The City of Los Angeles has already recognized the rights of the other Westwood Village property owners in connection with subsurface, as well as surface, vacations.

In approving the Vesting Tract Map for the predecessor project to this one, the City required the developer to *get consents and waivers of damages* from other property owners as a condition of the subsurface vacations. A copy of the relevant three pages from the City's approval is enclosed.

We respectfully request that you deny the proposed subsurface vacation. If, however, the City decides to approve it, we request that at least the same requirements as were imposed in the predecessor project, including for a 10-foot depth and for consents and waivers of damages from other property owners, be imposed as a condition of this subsurface vacation.

Very truly yours,

  
David Roberts  
President

Enclosure

CITY OF LOS ANGELES  
CALIFORNIA

DEPARTMENT OF  
CITY PLANNING  
221 N. FIGUEROA STREET  
LOS ANGELES, CA 90012-2601

CITY PLANNING  
COMMISSION

PETER M. WEIL  
PRESIDENT

ROBERT L. SCOTT  
VICE-PRESIDENT

MARNA SCHNABEL

NICHOLAS H. STONNINGTON  
ANTHONY N.R. ZAMORA

COMMISSION  
EXECUTIVE ASSISTANT  
(213) 580-5234



RICHARD J. RIORDAN  
MAYOR

EXECUTIVE OFFICES  
16TH FLOOR

CON HOWE

DIRECTOR  
(213) 580-1160

FRANKLIN P. EBERHARD  
DEPUTY DIRECTOR  
(213) 580-1163

GORDON B. HAMILTON  
DEPUTY DIRECTOR  
(213) 580-1165

ROBERT H. SUTTON  
DEPUTY DIRECTOR  
(213) 580-1167

FAX: (213) 580-1176

INFORMATION  
(213) 580-1172

Decision Date: MAR 16 1998

Appeal Period Ends: MAR 26 1998

Village Center Westwood, L.P.  
112 W. Ninth Street, #1200  
Los Angeles, CA 90015

Psomas and Associates  
3420 Ocean Park Blvd., #1040  
Santa Monica, CA 90405

Re: Vesting Tract Map No. 52169  
Council District : 5  
Existing Zone: C4-2-D  
Community Plan: Westwood  
EIR No.: 95-0075  
Fish and Game: Exempt

In accordance with provisions of Section 17.03 and 17.10.1 of the Los Angeles Municipal Code, the Advisory Agency approved Vesting Tentative Tract No. 52169 for the purpose of merger and resubdivision composed of 14 lots located at 1000 - 1060 Glendon Avenue south of Weyburn Avenue for a maximum 457,250 square-foot, commercial/residential project as shown on the map stamp-dated July 31, 1996. The subdivider is hereby advised that the Municipal Code may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property. Conditions identified with a "#" may only be cleared by the Advisory Agency or a City Planner. For an appointment call (213) 580-5532. The Advisory Agency's approval is subject to the following conditions:

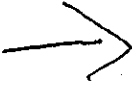
1. That a turnaround area be dedicated at the northerly limit of the remaining public street portion of Glendon Avenue in conjunction with the street merger satisfactory to the City Engineer.
2. That portions of Glendon Avenue and any other public easements deemed unnecessary by the City Engineer within the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

PUBLIC COUNTER & CONSTRUCTION SERVICES CENTER  
CITY HALL - 200 N. SPRING STREET, RM. 4605 - (213) 485-7826  
VAN NUYS - 6251 VAN NUYS BLVD., 1ST FLOOR, VAN NUYS 91401 - (818) 756-8596

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

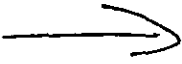
Recycle and reuse from recycled waste.



- 
- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
  - b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

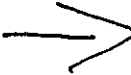
Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

3. That the subsurface portions of Weyburn Avenue to the street centerline from a depth of 10 feet below the street flow line and any other public easements deemed unnecessary by the City Engineer adjoining the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code; and in addition, the following be done and be administered by the City Engineer:

- 
- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
  - b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

4. That the subsurface portions of Tiverton Avenue to the street centerline from a depth of 10 feet below the street flow line and any other public easements deemed unnecessary by the City Engineer adjoining the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

- 
- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
  - b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

- 5. That tentative tract No. 50774 be received and filed prior to recordation of this map satisfactory to the City Engineer.
- 6. That the final map of this development includes the following items satisfactory to the City Engineer:
  - a. Plan view at different elevations.
  - b. Isometric views.
  - c. Elevation views.
  - d. Section cuts at all locations where air space lot boundaries change.
- 7. That a covenant and agreement be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:
  - a. That the owners shall be required to maintain all elements of the structure below the limited street rights-of-way of Weyburn Avenue and Tiverton Avenue in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structure within and adjacent to the limited street rights-of-way areas for any necessary inspection, upon request during normal business hours. The City may request the owner to repair or replace damaged, defective or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractor to make said repairs.
  - b. The owner shall be required to limit use and occupancy of the structure

**BOUZA, KLEIN & GOOSENBERG**

A PROFESSIONAL LAW CORPORATION

849 SOUTH HOPE STREET, SUITE 110  
LOS ANGELES, CALIFORNIA 90015  
TELEPHONE (213) 488-0675  
FACSIMILE (213) 488-1316

WRITER'S EMAIL ADDRESS

ABOUZA@BKGLAW.COM

June 5, 2001

VIA MESSENGER

Mr. Gus Dembegiotis  
City of Los Angeles  
Street Vacation Investigation Section  
Bureau of Engineering  
634 S. Spring Street  
Suite 400  
Los Angeles, CA 90014

Re: Proposed Subsurface Vacation of Glendon  
Avenue between Weyburn Avenue and Kinross Avenue

Dear Mr. Dembegiotis:

We represent Arden-Westwood, I.L.C., the owner of 1100 Glendon Avenue. In that capacity, we are responding to the Notice of Proposed Vacation, dated April 18, 2001, that was circulated regarding the proposed subsurface vacation of a portion of Glendon Avenue between Weyburn Avenue and Kinross Avenue to build a subterranean parking garage four (4) feet below street level. For your convenience, I have enclosed a copy of the site plan showing the location of the proposed vacation that also shows the parcels occupied by the 1100 Glendon Building.

If any other vacation of Glendon is contemplated for this project, we have not been made aware of it and, of course, it should be considered in conjunction with the proposed subsurface vacation.

The owner of 1100 Glendon Avenue has invested millions of dollars to renovate it on the assumption and understanding that Glendon Avenue would be available for use without interruption. The proposed construction of a subsurface parking structure and the resulting relocation of utilities would involve significant and protracted disruption of the use of the affected portions of Glendon Avenue to the material detriment of 1100 Glendon Avenue and could permanently diminish the function of both. The project applicant has undoubtedly designed the project in this manner to avoid the additional cost of constructing additional underground parking under its parcel. The opportunity to build a private parking structure under a public street was not provided to our client, and it seems unreasonable to allow it to proceed

Mr. Gus Dembegiotes

June 5, 2001

Page 2

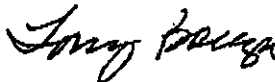
given the tremendous hardship that it will create for our client and the other owners of property in the vicinity.

It also seems unreasonable and unfair to allow one property owner to permanently take for its exclusive use the entire subsurface of a public street and to cause significant hardship to other nearby property owners as a result. The applicant should limit its parking to the property it owns, regardless of whether that will be more expensive. Vacating the subsurface of Glendon will permanently prevent any future use of it by any other party or for any other purpose, such as additional utilities or a subway.

The owner of 1100 Glendon Avenue respectfully requests that you do not grant the proposed subsurface vacation of Glendon Avenue. In the alternative, revising the vacation to a depth of ten (10) feet or more below the surface of Glendon Avenue and prohibiting the disruption of any utility service or access along Glendon during the construction process would address most of our client's concerns, although, not, however, our concern about providing this public benefit for the private use on one project owner to the detriment of future uses.

I appreciate your cooperation in this matter. If you have any questions or comments, please contact me at your convenience.

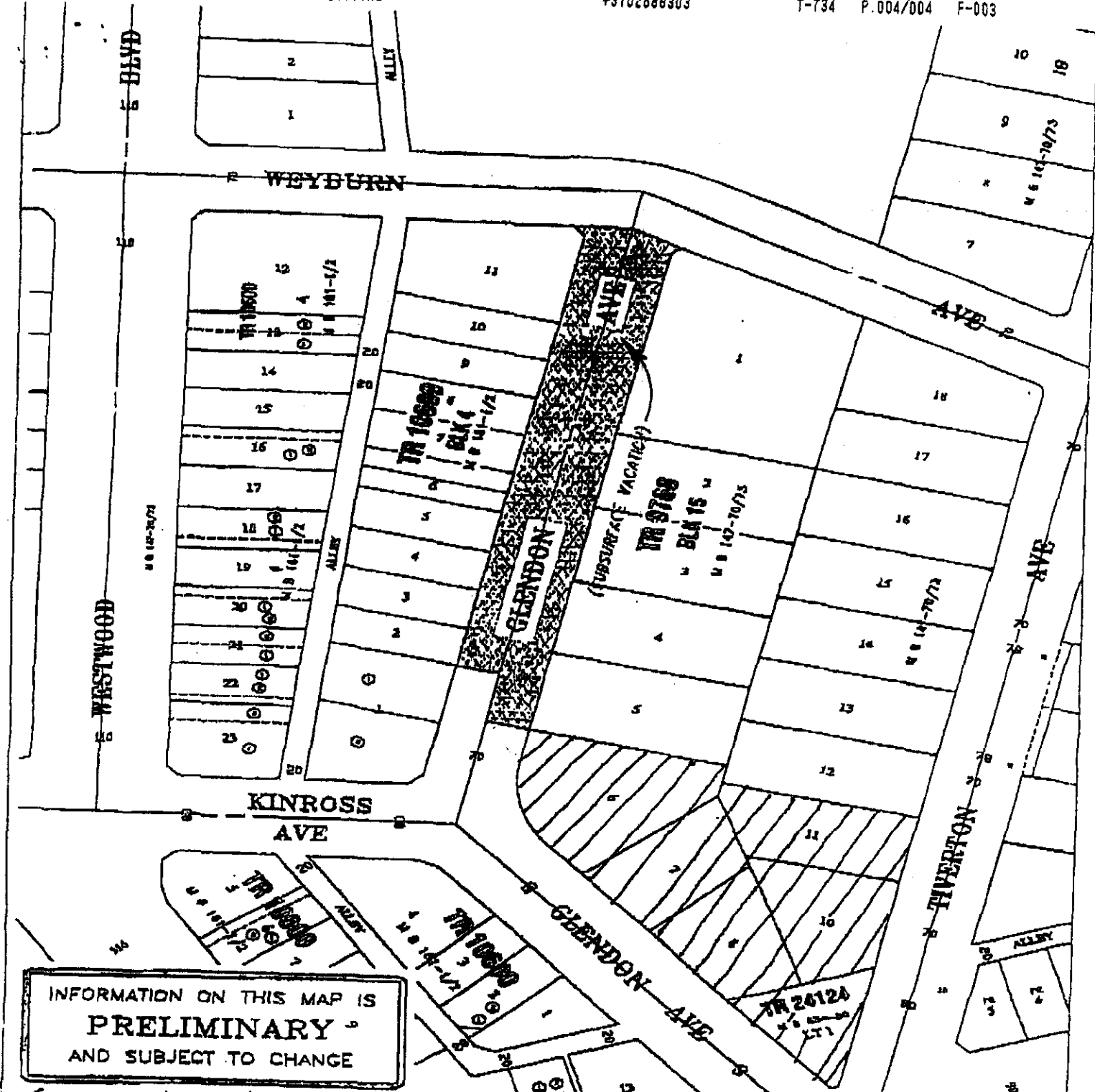
Very truly yours,



Anthony S. Bouza

Enclosure

cc: David A. Swartz, Esq. (w/enc.) -- (Via Telecopier)



TITLE: GLENDON AVENUE (PORTION OF) BETWEEN WEYBURN AVENUE  
AND KINROSS AVENUE (SUBSURFACE VACATION)

WORK ORDER NO. VAC- E1400741  
COUNCIL FILE NO. \_\_\_\_\_  
COUNCIL DIST. 5 DIV. INDEX 1136  
ENGR. DIST. W.L.A T.G. 632-83  
DISTRICT MAP 132B149 & 132B153  
135B149



CITY OF LOS ANGELES  
DEPT. OF PUBLIC WORKS  
  
VITALY B. TROYAN  
CITY ENGINEER

EXHIBIT A

June 7, 2001

**VIA FACSIMILE AT (213) 847-8272 AND REGULAR MAIL**

Mr. Gus Dombegiotis  
Street Vacation Section  
Bureau of Engineering  
City of Los Angeles  
634 S. Spring Street, Suite 400  
Los Angeles, California 90014

Re: VAC - E1400741  
Notice of Proposed Vacation  
Glendon Avenue between Weyburn Avenue and Kinross Avenue

Dear Mr. Dombegiotis:

We are writing in reply to the Notice of Proposed Vacation dated April 18, 2001, for the above referenced street vacation. Madison Marquette is the owner and property manager of the former Macy's Westwood building at 10861 Weyburn Avenue (hereinafter referred to as the 10861 Weyburn Building), and the owner and property manager of a number of other buildings, including buildings on Westwood Boulevard, adjacent to or in the vicinity of the portion of Glendon Avenue proposed to be vacated. We are presently undertaking a multi-million dollar renovation of the 10861 Weyburn Building, and the new tenants are expected to open for business in the Fall of 2001. Although we understand this proposal to be a subsurface vacation, if it is approved it may nevertheless adversely impact our buildings, particularly during the construction period. The long term impact depends upon the ultimate project necessitating this vacation.

We understand that this vacation is being requested in connection with a development project proposed and adjacent to the section of Glendon Avenue to be vacated. If this vacation is to be approved by the City, it should be subject to the approval of the development project, and a clear showing of the need for the subsurface parking area or other improvements related to the project.

Your Notice does not indicate that in order for this vacation to be final, that consents and waivers of damages must be obtained from all property owners having rights to the area of the street proposed to be vacated. Under the California Streets and Highways Code and case law interpreting the Code, each property owner with a tract has a private easement over the streets, including the subsurface area of the streets, as shown on the tract map, which easement is not extinguished by the City's vacation of the public easement. Therefore, if this vacation is approved, the applicant will need the consent of Madison Marquette and all other property owners having certain rights in Glendon Avenue.



The Notice does not provide any information concerning the proposal other than a brief description of the purpose for the vacation, which is to construct a subterranean parking garage four feet below street level. Accordingly, we assume that the existing roadway will remain unchanged from its current configuration and elevation. If this proposal results in changes to the design or capacity of Glendon Avenue, complete details need to be circulated for public review and comment. This segment of Glendon Avenue provides important vehicular circulation in Westwood Village, serves as the main access to the 10861 Weyburn Building from the south, and will be essential to provide customer access into the building once its tenants open for business.

The Notice does not indicate whether Glendon Avenue will need to be closed during construction of the subterranean structure. Nor does the Notice indicate if any portion of Weyburn Avenue would be restricted to traffic and/or pedestrians during construction. Any prolonged period of time during which either of these streets would be closed would have a detrimental effect on our buildings. Additional information is needed as to construction methods to be used. For example, is the subterranean structure going to be constructed using a cut and cover method which would require closure of the street? Will the construction of the parking structure require tie-backs or shoring that could affect properties other than the applicant's? If this is the case, the applicant must obtain appropriate right of access agreements from such other properties. In addition, detailed mitigation measures must be adopted to reduce construction impacts, including impacts from noise, vibration, construction related emissions and dust and traffic impacts due to any street closures.

The Notice does not provide any information regarding utilities located in Glendon Avenue which may be required to be relocated. If this request is approved, it should be conditioned to ensure that utility services shall not be interrupted, other than that to properties under the control of the applicant in this matter. Any relocation or reconnections of utilities serving properties other than their own must be done at their expense and completed prior to disconnection of the existing utilities.

Glendon Avenue also serves as a major point of access for delivery trucks serving the 10861 Weyburn Building and other buildings in the Village. If this request is approved, the reconstructed roadway must be rebuilt to accommodate these delivery vehicles with no greater weight restriction than currently exists, if any.

The suitability of the soils for such proposed construction needs to be investigated, and details on the measures to be taken by the applicant to ensure the stability of surrounding streets and structures must be provided. These details must be provided to the public for review prior to the City taking any action on the request.

As an owner and manager of property which may be affected by this proposed vacation, please include me on all future notices concerning this matter. Thank you for the opportunity to provide these comments on the proposed vacation of a portion of Glendon Avenue. We look forward to reviewing the City's response.

Sincerely,

A handwritten signature in black ink that reads "Michael A. Tewalt". The signature is fluid and cursive, with the first name "Michael" and last name "Tewalt" clearly legible.

Michael A. Tewalt  
Vice President, Development

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 Lydia & Alfred Wong, Ph.D.  
 David Zucker  
 (partial listing)

June 6, 2001

**By Fax No. 213-847-8272 & Regular Mail**

Mr. Gus Dembegiotes  
 Street Vacation Investigation Section  
 Bureau of Engineering  
 634 S. Spring Street, Suite 400  
 Los Angeles, CA 90014

Re: VAC-E1400741

Glendon Ave. (Por/o) bet. Weyburn Ave. & Kinross Ave.  
 (Subsurface Vac.)

Dear Mr. Dembegiotes:

This is in response to the City's Notice of Proposed Vacation, dated April 18, 2001, regarding the above proposed subsurface vacation.

**1. Surface Vacation Required.** The Notice of Preparation of the Environmental Impact Report for this project states that this project will require, among other things, "narrowing" the Glendon Avenue public right of way to approximately half its current width.

This constitutes a *partial vacation of surface rights* which requires a formal application and vacation proceeding with proper notice. The above-referenced Notice does not include the surface vacation, and to our knowledge no such application or notice has been provided to date.

**2. Traffic Circulation.** The proposed vacations would be highly detrimental to the already restricted traffic circulation in Westwood Village, even on a "temporary" basis during construction. Glendon is one of only three north-south streets in the highly congested Village.

Further, there are several new projects completed or underway in the Village representing millions of dollars of investment that require uninterrupted access over Glendon Avenue, including the newly-renovated office high-rise at 1100 Glendon immediately

adjacent to the south end of the proposed vacation, and the total renovation of the Macy's building at the north end of the vacation which will be bringing four new, long-awaited, retail tenants to the Village within the next several months. These businesses rely on Glendon as their primary path of ingress and egress from both north and south.

It is critical that Glendon Avenue remain fully functional throughout any proposed construction on this site.

**3. Private Easements.** Under California Streets & Highways Code ("SHC") §8353(b), *every owner within a tract has a private easement over all the streets shown on the tract map, which is not extinguished by the city's vacation of the public easement.* The definition of "street" under SHC §8308 includes all rights connected therewith, e.g., subsurface as well as surface.

Under Danielson v. Sykes, 157 Cal. 686 (1910), this private easement extends to all streets in the subdivision, not just streets abutting the lot. Under Norcross v. Adams, 263 C.A.2d 362, 365, 367 (1968), the government entity may also be liable.

The City of Los Angeles has already recognized the rights of the other Westwood Village property owners in connection with subsurface, as well as surface, vacations.

In approving the Vesting Tract Map No. 52169 for the predecessor project to this one (on this same property), the City required the developer to get *consents and waivers of damages* from other property owners as a condition of the subsurface vacations. A copy of the relevant three pages from the City's approval is enclosed.

**4. Cultural Resource.** In 1998, the State of California declared the Glendon Manor apartment building, which is slated for demolition as part of this project, to be of statewide historical significance after extensive hearings in which the owner of the building participated. The State introduced the rules, under which Glendon Manor was designated historical, several years after the Westwood Village Specific Plan was enacted. Glendon Manor is within the Specific Plan boundaries. Based on the State's determination, this building has been flagged by the Los Angeles Building & Safety Dept. to protect it from demolition.

Section 9.B of the Westwood Village Specific Plan does not permit vacation of a street for subsurface parking if a cultural resource is demolished:

"B. Subsurface Parking. If a cultural resource is demolished or relocated, subsurface parking in conjunction with any replacement structure *may not extend into the public right-of-way.*" (emphasis added.)

5. **Depth.** We are concerned that the application requests a subsurface vacation beginning only 4 feet below the surface.

In the predecessor project on this property, the city required that subsurface vacations begin 10 feet below the surface. We do not have the technical knowledge necessary to independently assess this issue, but we must assume that 10 feet is the minimum necessary, and perhaps more would be preferable.

6. **Strength.** According to the city's findings in the predecessor project on this property, the street when replaced was *not* going to be strong enough to support the weight of emergency vehicles -- even with a 10-foot margin before the subsurface vacation began.

Public safety considerations require that the street when replaced will be strong enough to carry all vehicles, such as cars, large commercial delivery trucks, and ambulances and fire trucks.

7. **Possible Deficiency in Notice and Application.** The predecessor project on this property required subsurface vacations for an underground parking structure, *not only* for Glendon Avenue, but also to the centerlines of Weyburn Avenue, Tiverton Avenue and the alley on the western edge of the property abutting buildings on Westwood Blvd.

This Notice does not include those other subsurface vacations, and to our knowledge notice has not been provided by the city to those affected property owners. We are concerned that this application and Notice do not fully reflect all the subsurface vacations that may be required for this project.

8. **Business Goodwill.** Businesses impacted by the loss of Glendon Avenue during and/or after construction may be entitled to damages from the city and/or the developer, as was the case in the MTA construction under Hollywood Blvd.

9. **Community Plan Amendment.** Glendon Avenue is shown on the Westwood Community Plan map circulation element. We believe that an amendment to the Community Plan is required in order to vacate any portion of this street.

Mr. Gus Dembegiotes  
Street Vacation Investigation Section  
Re: VAC-E1400741  
June 6, 2001  
Page 4

10. **Residential Condition.** There is a zoning Q Condition which permits only residential uses for the lots fronting on Tiverton Avenue which are included in this project site. There is no assurance in this application that the subsurface parking will be limited to residential parking. In fact, the proposed project plan involves commercial uses on the ground floor of the Tiverton lots, which violates the Westwood Village Specific Plan.

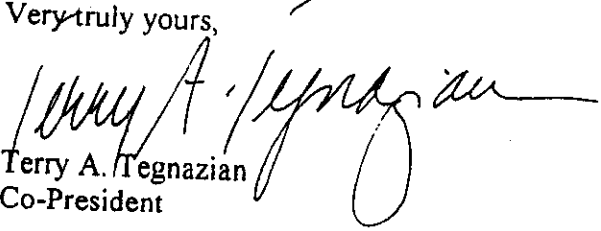
11. **No Demonstrable Public Interest.** The application does not demonstrate any public benefit or public interest that might justify the city's surrendering public subsurface or surface rights in Glendon Avenue. The area proposed for subsurface vacation below Glendon Avenue represents nearly an acre of property (actually, several acres when multiplied by the number of levels of parking).

Given the cost of land in Westwood and the cost of constructing subterranean parking, the requested subsurface vacation, if granted, amounts to a multi-million dollar gift from the city to the developer with no benefit to the public. To the contrary, such a vacation would interfere with emergency services and the economy of the Village, and create a major potential liability for the city if consents and waivers of damages from all the other property owners in the tract are not first obtained.

Thank you for this opportunity to comment on this application.

Please send all future notices of vacation, and all documents and proceedings pertaining to this project, to us and to all business and property owners within the original Westwood tract. If you have any questions, please call me directly at 310-470-0770.

Very truly yours,

  
Terry A. Tegnazian  
Co-President

enc.

CITY OF LOS ANGELES  
CALIFORNIA



RICHARD J. RIORDAN  
MAYOR

DEPARTMENT OF  
CITY PLANNING  
221 N. FIGUEROA STREET  
LOS ANGELES, CA 90012-2601

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INFORMATION  
(213) 580-1172

Decision Date: MAR 16 1998

Appeal Period Ends: MAR 26 1998

Village Center Westwood, L.P.  
112 W. Ninth Street, #1200  
Los Angeles, CA 90015

Psomas and Associates  
3420 Ocean Park Blvd., #1040  
Santa Monica, CA 90405

Re: Vesting Tract Map No. 52169  
Council District : 5  
Existing Zone: C4-2-D  
Community Plan: Westwood  
EIR No.: 95-0075  
Fish and Game: Exempt

In accordance with provisions of Section 17.03 and 17.10.1 of the Los Angeles Municipal Code, the Advisory Agency approved Vesting Tentative Tract No. 52169 for the purpose of merger and resubdivision composed of 14 lots located at 1000 - 1060 Glendon Avenue south of Weyburn Avenue for a maximum 457,250 square-foot, commercial/residential project as shown on the map stamp-dated July 31, 1996. The subdivider is hereby advised that the Municipal Code may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property. Conditions identified with a "\*" may only be cleared by the Advisory Agency or a City Planner. For an appointment call (213) 580-5532. The Advisory Agency's approval is subject to the following conditions:

1. That a turnaround area be dedicated at the northerly limit of the remaining public street portion of Glendon Avenue in conjunction with the street merger satisfactory to the City Engineer.
2. That portions of Glendon Avenue and any other public easements deemed unnecessary by the City Engineer within the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

PUBLIC COUNTER & CONSTRUCTION SERVICES CENTER  
CITY HALL - 200 N. SPRING STREET, RM. 4606 - (213) 485-7826  
VAN NUYS - 6251 VAN NUYS BLVD., 1ST FLOOR, VAN NUYS 91401 - (818) 756-8596

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- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
- b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

- 3. That the subsurface portions of Weyburn Avenue to the street centerline from a depth of 10 feet below the street flow line and any other public easements deemed unnecessary by the City Engineer adjoining the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

- 
- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
  - b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

- 4. That the subsurface portions of Tiverton Avenue to the street centerline from a depth of 10 feet below the street flow line and any other public easements deemed unnecessary by the City Engineer adjoining the tract boundaries be permitted to be merged with the remainder of the subdivision pursuant to Section 66499.20-1/2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

- 
- a. That consents to the public streets and easements being merged and waivers of any damages that may accrue as a result of such merger be obtained from all property owners who might have certain rights in the area being merged.
  - b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

Note: The Advisory Agency hereby finds that the public streets and easements to be merged are unnecessary for present or prospective public purposes and all owners of interest in the real property within the subdivision have or will have consented to the merger prior to recordation of the final map.

- 5. That tentative tract No. 50774 be received and filed prior to recordation of this map satisfactory to the City Engineer.
- 6. That the final map of this development includes the following items satisfactory to the City Engineer:
  - a. Plan view at different elevations.
  - b. Isometric views.
  - c. Elevation views.
  - d. Section cuts at all locations where air space lot boundaries change.
- 7. That a covenant and agreement be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:
  - a. That the owners shall be required to maintain all elements of the structure below the limited street rights-of-way of Weyburn Avenue and Tiverton Avenue in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structure within and adjacent to the limited street rights-of-way areas for any necessary inspection, upon request during normal business hours. The City may request the owner to repair or replace damaged, defective or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractor to make said repairs.
  - b. The owner shall be required to limit use and occupancy of the structure



LETTERS REQUESTING RECIRCULATION OF THE DEIR

# FRIENDS OF WESTWOOD

March 27, 2002

Via Fax

Mr. Con Howe, Director of Planning  
City of Los Angeles  
200 N. Spring Street, Room 525  
Los Angeles, CA 90012

RE: Fundamental Deficiency in DEIR and Request for Recirculation of  
AIMCO/Casden Project (Palazzo Westwood)  
EIR No. 2000-3213; VAC-E1400741

Dear Con:

After a preliminary review of the DEIR for the above referenced project, it has become apparent that several fundamental errors have occurred in the preparation of this document that require recirculation after correcting the deficiencies. The DEIR was issued February 21, 2002. Comments are due by April 8, 2002.

1. FRIENDS OF WESTWOOD, ARDEN REALTY, and WILSHIRE GLENDON ASSOCIATES jointly submitted extensive comments. Neither our comments, nor those of any other public respondent, were published in the DEIR.

This stands in stark contrast with the Smedra DEIR, with all its deficiencies, which did include all public comments. It thus appears that there are variable standards of review by the Planning Department, which violate due process protections. At a minimum, if the City chooses to include any comments, then it must include all such comments.

2. Friends of Westwood, et al's comments raised several substantive issues that were not addressed in the EIR. The City is obligated to respond to public comments in a reasonable manner. We can find no response to substantive issues identified in our comments.

Without publishing both the comments and addressing them in the DEIR, decision-makers would have no way to know of these concerns, and may be unaware of significant liabilities if they approve the requests. Above all, CEQA is a full-disclosure law. Full disclosure of potential impacts and possible mitigations have not been provided to decision-makers in this DEIR.

## FRIENDS OF WESTWOOD

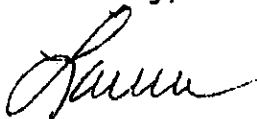
3. Also missing from the DEIR are the pertinent staff reports or analyses (e.g., from the Department of Transportation or the Bureau of Engineering), and information on the proposed street vacation/pedestrian mall (along with the public comments filed on that issue, which were addressed to the Bureau of Engineering).

It is essential that all relevant approval and the impacts related thereto be fully and fairly disclosed in the DEIR in order to avoid piecemeal approvals. Proposed actions by the Bureau of Engineering for this project need to be within the scope of this DEIR.

We therefore call upon you to immediately correct this fatal deficiency and recirculate the DEIR in its entirety.

Thank you for your prompt consideration and action on this matter. Feel free to call me at 310-470-4522.

Sincerely,



Laura Lake, Ph.D., President  
FRIENDS OF WESTWOOD

cc: Maya Zaitzevsky, EIR Section, Planning Dept.  
Jimmy Liao, EIR Section, Planning Dept.  
Emily Gabel-Luddy, Planning Department  
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# SAVE WESTWOOD VILLAGE

*Dedicated to Quality Revitalization*

March 27, 2002

Mr. Con Howe  
 Director of Planning  
 City of Los Angeles  
 200 N. Spring Street, Room 525  
 Los Angeles, CA 90012

RE: AIMCO/Casden Project - Palazzo Westwood  
 EIR No. 2000-3213; VAC-E1400741  
Fundamental deficiency in Draft EIR  
Requiring Recirculation

Dear Mr. Howe:

The Draft EIR ("DEIR") for the above-referenced project was issued February 21, 2002. Comments are due by April 8, 2002.

In reviewing the DEIR, it has come to our attention that none of the public's comments to the Notice of Preparation ("NOP") happen to be included.

Appendix A includes the NOP info and purports to include comments received in response to the NOP. However, only comments from governmental agencies are included. Comments received from the public are totally ignored.

We filed comments, and our comments are not included. We are also aware of several other sets of comments from the public which were filed but are likewise not included.

Further, not only are the public's comments themselves omitted, but substantial issues raised in those comments do not appear to have been addressed in the DEIR.

It may or may not be the case that (as your staff has advised us) CEQA does not require that comments to the NOP be included in the DEIR.

*However, at a minimum, if the City chooses to include any comments, then it must include all such comments.*

## ADVISORY BOARD

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Mr. Con Howe  
AIMCO/Casden Project - Palazzo Westwood  
March 27, 2002  
Page 2

The City cannot pick and choose -- disclosing only those comments which it likes and ignoring the others. *Fundamental fairness* and the principal of full and fair disclosure require that if any comments are disclosed, all comments must be disclosed. Only with full knowledge of all the issues that have been raised can meaningful review be made of the DEIR.

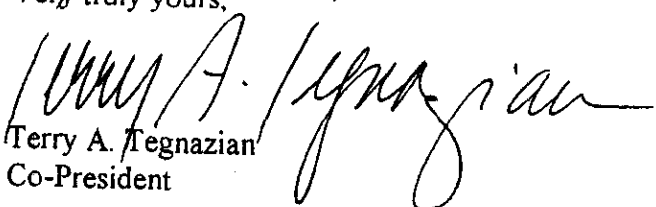
It is important to note that the DEIR for the predecessor project to this (the "Smedra movie mall") did include the public's comments to the NOP.

Also missing from this DEIR are *pertinent staff reports or analyses* (e.g., from the Department of Transportation or the Bureau of Engineering), and information on the proposed street vacation (along with the public comments filed on that issue). It is essential that all relevant approvals and the impacts related thereto be fully and fairly disclosed in the DEIR, in order to avoid piecemeal approvals.

Please correct this fatal deficiency immediately by amending and recirculating the DEIR in its entirety.

Thank you for your prompt attention to this matter. Please feel free to call me at my direct telephone number 310-470-0770.

Very truly yours,

  
Terry A. Tegnazian  
Co-President

cc: Maya Zaitzevsky  
Jimmy Liao  
Emily Gabel-Luddy  
Councilman Jack Weiss  
Renee Schillaci  
Rocky Delgadillo, City Attorney  
Mayor James Hahn



# Westwood Hills Property Owners Association

incorporated 1968

P.O. Box 24515

Los Angeles, California 90024

March 28, 2002

Mr. Con Howe

Director of Planning  
City of Los Angeles  
200 N. Spring Street, Room 525  
Los Angeles, CA 90012

RE: AIMCO/Casden Project - Palazzo Westwood  
EIR No. 2000-3213; VAC-E1400741  
Fundamental deficiency in Draft EIR Requiring Recirculation

Dear Mr. Howe *Alan*

I am writing to bring to your attention a serious problem with the Draft EIR on the Palazzo Westwood project arising from the failure of the Draft EIR to reveal and address all of the issues raised during the scoping process. This problem must be remedied by immediate correction and recirculation of the Draft EIR. The Draft EIR ("DEIR") for the project was issued February 21, 2002. Comments are due by April 8, 2002.

In reviewing this EIR you will find that none of the public's comments to the Notice of Preparation ("NOP") have been included. This omission will lead many readers to believe that the public did not participate in the scoping process that preceded the environmental review of the project. This is not the case. Rather, it seems that public comment, and only public comment, was deliberately excluded from the Draft EIR.

Appendix A includes a copy of the NOP and purports to include the comments received in response to the NOP. However, only comments from governmental agencies are included. Comments received from the public are totally ignored.

Residents of the Westwood area, including at least one resident of the Westwood Hills neighborhood, filed comments which are neither included nor acknowledged in the Draft EIR. Further, not only are the public's comments themselves omitted, but substantial issues raised in those comments do not appear to have been addressed in the DEIR.

Mr. Con Howe March 28, 2002

Mr. Con Howe March 28, 2002  
Page 2.

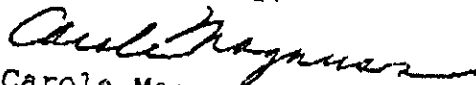
Surely, if the City chooses to include any comments, then it must include all such comments.

The City cannot pick and choose -- disclosing only those comments which it likes and ignoring the others. Fundamental fairness and the principal of full and fair disclosure require that if any comments are disclosed, all comments must be disclosed. Only with full knowledge of all the issues that have been raised can meaningful review be made of the DEIR.

Exclusion of this set of comments violates custom in preparation of Draft EIR documents. In fact, in my experience, environmental review of complex projects is invariably preceded by a wide-reaching public scoping process that is scrupulously documented in the Draft EIR. This practice is so common that it is difficult to understand how the City's EIR on this complex project could fail to include all comment and acknowledge all issues raised during the scoping period. Meticulousness in environmental review of the Palazzo Westwood project is particularly important since the Draft EIR indicates that the developer intends to rely on it to support several radical changes to the Westwood Village Specific Plan. The public deserves no less than full disclosure of all of the issues in a scrupulously documented Draft EIR. Unfortunately, that will require recirculation of this document.

Thank you very much for your prompt attention to this problem.

Very sincerely,



Carole Magnuson  
President

cc: Maya Zaitzevsky  
Jimmy Liao  
Emily Gabel-Luddy  
Councilman Jack Weiss  
Renee Schillaci  
Rocky Delgadillo, City Attorney  
Mayor James Hahn

**METCALFE ASSOCIATES**  
Urban Design  
Development Planning  
1421 Pandora Avenue  
Los Angeles, CA 90024  
Tele/Fax: (310) 474-8418

**Michael S. Metcalfe**  
Principal

March 27, 2002

FAX: (213) 978-1275

Page 1 of 2

Mr. Con Howe  
Director of Planning  
City of Los Angeles  
200 N. Spring Street, Room 525  
Los Angeles, CA 90012

RE: EIR No. 2000-3213; VAC-E1400741  
AIMCO/Casden Project - Palazzo Westwood  
Fundamental deficiency in Draft EIR Requiring Recirculation

Dear Mr. Howe:

The Notice of Preparation (NOP) and a Pre-Draft Request For Comments regarding the above referenced Project was issued under the signature of City Planner Jimmy C. Liao of your office on October 27, 2000. The Pre-Draft Request instructed that written comments be submitted to Mr. Ed Reyes and/or Mr. Liao, Project Coordinators, no later than November 27, 2000.

An amendment to the NOP was issued on November 2, 2000 enumerating the Applicant's Requested Actions, Westwood Village Specific Plan (WVSP) amendments and related issues, and extended the comment period to December 4, 2000.

My written comments were Faxed and mailed to Messrs. Reyes and Liao on November 27, 2000. A copy is attached following this letter for your convenience.

The Draft EIR ("DEIR") for the above-referenced project was issued February 21, 2002. Comments are due by April 8, 2002.

In reviewing the DEIR, I find that my letter and the letters of numerous other local respondents to the NOP, which I am aware of, are not included in the DEIR.

Further, not only are the public's comments themselves omitted, but substantial issues raised in those comments do not appear to have been addressed in the DEIR.

It may or may not be the case that (as your staff has advised us) CEQA does not require that comments to the NOP be included in the DEIR. However, at a minimum, if the City chooses to include any comments, then it must include all such comments.

Fundamental fairness and the principal of full and fair disclosure require that if any comments are disclosed, all comments must be disclosed. Only with full disclosure and assessment of all the issues that have been raised can meaningful review be made of the DEIR. It is important to note that the DEIR for the predecessor project to this (the "Smedra movie mall") did include the public's comments to the NOP.



METCALFE ASSOCIATES

March 27, 2002

FAX: (213) 978-1275

Mr. Con Howe, Director of Planning RE: EIR No. 2000-3213; VAC-E1400741

Page 2 of 2

Also missing from this DEIR are pertinent staff reports or analyses (e.g., from the Department of Transportation or the Bureau of Engineering), and information on the proposed street vacation (along with the public comments filed on that issue). It is essential that all relevant approvals and the impacts related thereto be fully and fairly disclosed in the DEIR, in order to avoid piecemeal approvals.

Please correct this deficiency immediately by amending and re-circulating the DEIR with all the appropriate written comments submitted in response to the NOP appended thereto.

Thank you for your prompt attention to this matter. Please feel free to call me at my direct telephone number 310-474-6418.

Very truly yours,



Michael S. Metcalfe  
Co-President  
Save Westwood Village

cc: Maya Zaitzevsky  
Jimmy Liao  
Emily Gabel-Luddy  
Councilman Jack Weiss  
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**Michael S. Metcalfe**  
Principal

November 27, 2000  
FAX Letter: (213) 580-5542  
Mr. Ed Reyes and/or Mr. Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
221 North Figueroa Street, Suite 1500  
Los Angeles, CA 90012

RE: EIR No. 2000-3213; Palazzo Westwood

Dear Sirs:

I am writing to register my concerns regarding the urban design and planning proposition of the Palazzo Westwood project.

The Applicant has requested more than eighteen (18) major amendments and exceptions to the Westwood Village Specific Plan (WVSP) which are proposed solely to benefit the Applicant's development interests. The developer's requests are all antithetical to the best interests of the community. Each of the Applicant's requested amendments can only be approved at the expense of the public realm. Such proposed amendments represent an unfortunate process that has been characterized as "the piecemeal privatization of the public realm." The developer's request combined with the proposed demolition of an important, original part of the urban fabric of the Village, Glendon Manor, is wholly unacceptable. (Please refer to the attached correspondence regarding the historic preservation of Glendon Manor.)

The Applicant is attempting to change the legally adopted WVSP (City ordinance and development regulations for dwelling unit density, setbacks, street width and capacity, and height limits), to suit his project. It seems that this approach is backward. I submit that the developer should first provide an explanation of why his project should not be adjusted to suit the legally established regulations of the WVSP.

The WVSP is designed to preserve public open space resources in the form of dwelling unit density limitations, frontage setbacks on Tiverton, and the width of the public right-of-way of Glendon Avenue. The WVSP is also designed to preserve the historic character and architectural integrity of the Village. Please review the preamble of the WVSP, under SUMMARY OF PROVISIONS, which describes the Specific Plan's general intent, stipulating the following on WVSP Page 1-1:

*"To permit, encourage and facilitate the preservation, renovation and ongoing maintenance of historically and architecturally significant buildings."*

Does the developer also propose to amend the WVSP to remove this statement of intent?

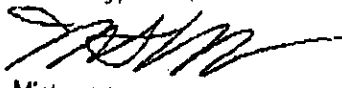
I am opposed to any amendment to the Westwood Village Specific Plan (WVSP) for the exclusive purpose of facilitating this otherwise non-conforming project. I assisted in development of the WVSP. I recall that it took approximately seven (7) years of protracted negotiations among multiple competing interests and stakeholders to finalize and approve. Why should such an achievement as the WVSP, and so much difficult community planning effort be summarily overturned to suit the financial objectives of this one developer? Also, the proposal for a 60,000 sq. ft. supermarket does not make sense in light of the enclosed press release for the old Macy's Westwood building, directly across the street. Please see the following news item from the LABJ. Two markets so co-located is not functionally feasible in terms of land use.

My family and I have been residents of Westwood for more than 33 years. I am an architectural designer and an urban design and planning consultant (M. Arch, Urban Design, UCLA/GSAUP, '70). I am presently practicing as a consultant, serving real estate development advisory firms. My professional background includes more than 25 years of experience with well over 100 urban mixed-use retail/entertainment centers, destination resorts, office parks and other large scale projects completed to date.

I recognize that the WVSP designates higher and better uses for the subject site (designated Subarea 2) which, if developed in conformance with the WVSP, offers the potential to generate greater benefit to the local community, greater revenues to the City, and generate superior economic and physical revitalization benefits Village-wide.

Thank you for your consideration of this important matter.

Sincerely,

  
Michael S. Metcalfe  
Principal

SUNKEN PLAZA INFORMATION



DEPARTMENT OF CITY PLANNING  
CITY OF NEW YORK

MANHATTAN OFFICE

Joseph B. Rose, Director  
Department of City Planning

March 5, 1998

Save Westwood Village  
c/o Terry A. Tegnazian, Co-President  
1145 Gayley Avenue, Suite 309  
Los Angeles, CA 90024

Dear Ms. Tegnazian:

This will confirm our recent conversations. New York City has extensive experience with problems of public usability of sunken plazas, many of which were built by private developers on development sites in exchange for zoning floor area bonuses.

By its nature, a sunken plaza is located physically away from the street or sidewalk level, and as a result, creates difficulties in both visibility and accessibility for the public on the street. Sunken plazas frequently isolate the below-grade retail and other uses from pedestrian traffic flows, and cause failures in businesses due to the inability to attract people. Many of our sunken plazas in the business center are rarely visited by even daytime public users; let alone becoming totally deserted insecure places in the nighttime.

In response to these problems, since 1975 the New York City zoning law has not permitted an open space bonus for any plaza more than three feet above or below the curb level of the nearest adjoining sidewalk. In addition, plaza area can be located below a street only if it is directly connected to the underground public mass transit facility.

In addition to depth of plaza relative to the curb level, New York City's zoning law includes numerous other design requirements for obtaining an open space bonus, all based on extensive study of and experience with how urban spaces are actually used.

Further, the City has established two Zoning Special Districts in Midtown and Lower Manhattan. Open plazas of any depth are prohibited along the retail oriented streets and avenues, in order to maintain the continuity of retail frontage and to prevent the vitality of the street life from being weakened by interruptions caused by such plazas.

Please do not hesitate to call me if you have any further questions.

Very truly yours,

Patrick Too, Principal Urban Designer

Richard Barn, Director  
John Young, Deputy Director  
22 Rade Street, New York, N.Y. 10007-1218 Room 6W (212) 720-3480  
FAX (212) 720-3488

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DEPARTMENT OF ARCHITECTURE AND URBAN DESIGN  
1317 PERLOFF HALL  
BOX 951467  
LOS ANGELES, CALIFORNIA 90095-1467  
TEL: (310) 825-7837  
FAX: (310) 825-8869

Mr. Dan O'Donnel, Public Hearing Examiner  
Los Angeles City Planning Commission  
221 South Figueroa St., Suite 310  
L.A.

Dear Mr. O'Donnel,

I have been asked to comment on a proposed sunken plaza at Glendon south of Weyborn in Westwood.

During the period I was employed as Director of Planning and Development in the office of Mayor Lindsay of New York City, I had experience with a number of projects containing sunken plazas. In every case we found them to disrupt pedestrian street life and create unsightly "holes" in the urban fabric which damaged the continuity of retail frontage. I would strongly oppose any project which contained such a design feature.

Respectfully,

Richard Weinutsein, Professor of Architecture and Urban Design, Dean  
of the Graduate School of Architecture and Urban Planning 1985 - 94

Michael S. Metcalfe  
Principal

February 24, 1998  
Mr. Dan O'Donnel, City Planning Project Hearing Examiner  
Los Angeles City Planning Commission  
221 South Figueroa Street, Suite 310  
Los Angeles, CA 90012

Page 1 of 4

RE: CITY PLAN CASE NO. 96-0133-PA WESTWOOD PLANNING AREA;  
CITY PLAN CASE NO. 97-0397-DA CD5;  
CITY PLAN CASE NO. 97-0409-SPE; CASE NO. ZA 97-0848-CUB;  
VESTING TENTATIVE TRACT NO. V-52189; and  
EIR Case No. 96-0076-SUB (CUB) (SPA) Westwood Village Center;  
ERRATA TO DEIR; Reference No. SCH No. 96041033

Dear Mr. O'Donnel:

The following Annotated Background/Bibliography on Sunken Plazas is provided in reference to our Letters of Comments to the Draft and Final Environmental Impact Reports (D/FEIR) of January 9, 1998, July 28 and May 25, 1997, and as a supplement to our testimony at the Public Hearing of December 18, 1997 regarding the subject project. Please review and append this Background/Bibliography as appropriate to the respective City Planning Case Files as it is intended to provide added supporting documentation for the Los Angeles City Planning Commission's consideration of the case against approval of construction of any sunken plazas in Westwood Village.

As noted in earlier comments, sunken plazas have long been opposed by city planners, urban designers, knowledgeable real estate developers, and various public agencies for their inherently disruptive and damaging effects on the continuity of retail frontages and pedestrian circulation in commercial urban districts. Because of the inherent physical isolation and visual separation from the street, existing sunken plazas have consistently failed to function successfully, and due to their relatively high economic recovery costs, often remain as failed and vacant urban places in many cities. That's why New York City for example, denies open space bonuses for plazas more than three feet below street level and on important streets in central business districts, prohibits them altogether.

In the past, the City of Los Angeles has permitted a number of unfortunate examples of failed sunken plaza projects which have proven to be damaging and costly commercial development mistakes. Given the benefit of "fundamental lessons learned" from past experience, including the experience of other cities, such projects should never have been officially approved for construction to begin with, and certainly such mistakes must not now be repeated. Especially since the Westwood Village Specific Plan (WVSP) designed to preserve, enhance and extend the essential pedestrian streetscape, scale and urban fabric within the historic Janss/Holmby tract area.

Perhaps one of the more dramatic and costly sunken plaza failures has been the City's own Los Angeles Mall, adjacent to City Hall in the Civic Center, where the north sunken plaza roughly physically approximates the depth below grade, scale, and spatial isolation of the subject proposal in Westwood Village. Following years of commercial and fiscal losses, tenant space vacancies, poor access, etc., the Los Angeles City Council has recently reviewed recommendations to approve funding for Phase 2 of an on-going Los Angeles Mall revitalization feasibility study in which the City would incur substantial recovery costs. The City Department of General Services reports that the Los Angeles Mall Revitalization Redevelopment Team could incur total project costs in excess of \$300,000<sup>1</sup> and a revitalization concept plan prepared by Gensler and Associates for the City reports that the "retrofit", which would bring all retail activity up to street level to facilitate re-use of the space, would cost on the order of \$6.6 million<sup>2</sup>.

Moreover, as of November 1997, as directed and established by the Los Angeles City Council, the City's Crime Prevention Through Environmental Design (CPTED) Task Force has prepared and published the City of Los Angeles "DESIGN OUT CRIME" GUIDELINES which provide development recommendations intended to preclude construction of just such a sunken plaza as proposed in the subject project. Under DESIGN RECOMMENDATIONS, Natural Surveillance: Visual Connection, page 8, the City of L.A. guidelines state: "Provide a good visual connection between commercial and public environments such as streets, common areas, and sidewalks."<sup>3</sup>

February 24, 1998

Mr. Dan O'Donnel, City Planning Project Hearing Examiner

Page 2 of 4

RE: CITY PLAN CASE NO. 98-0133-PA, et. seq. WESTWOOD PLANNING AREA

Since the subject sunken plaza is proposed to be situated at 30' (thirty feet) below grade (referencing the elevation of the intersection of Weyburn and Glendon Avenue), the sight lines for natural surveillance and visual connection from Weyburn Avenue and its sidewalk down to the sunken plaza are obstructed, the plaza would not be visible from the street and sidewalk, and likewise, the street and sidewalk would not be visible from the 30 foot deep sunken plaza level. Thus, with the obstruction of natural surveillance sightlines, the proposed sunken plaza project in Westwood Village is in violation of the City of Los Angeles Crime Prevention Through Environmental Design Guidelines.

We recognize that the project's sunken plaza scheme is driven by the developer and the retail anchor tenant's (Ralph's Market) desire to avoid locating on the street level which would require higher ground rent charges, and that by locating the largest percentage of total project GLA (Gross Leasable Area, including the market, a drug store and other tenant space) on subterranean levels, the project would be, conceptually at least, more profitable for the investors. (Ralph's is also a major investor, and we believe they are unaware of the sunken plaza's potential for damage to the Village.)

We also recognize that the sunken plaza scheme, in turn, drives the need for the acquisition and privatization of the Glendon Avenue public right-of-way (an unwarranted bonus), which is then counted as additional site area in the calculation of the Floor Area Ratio (another unwarranted bonus), and that the sunken plaza scheme in combination with the acquisition of Glendon, the 3400 movie-seat multiplex, and the consequent demolition of the historic Glendon Manor building then in turn, collectively drive the need for the specious and unacceptable, proposed Westwood Village Specific Plan (WVSP) Amendment.

Ostensibly proposed by the City Councilman to "up-date" the WVSP in order to "revitalize" the Village, the Amendment is clearly proposed for at least two other primary reasons: first and foremost, to change the law, including the underlying zoning, in order to satisfy the developer and the investor's requests and to "mitigate" and facilitate official approval of this otherwise illegal project (which is not unlike the old fashioned and presently illegal practice of "spot zoning" in the history of Los Angeles) at the expense of all other local property owners, and secondarily, to eliminate or, in effect, repeal the constraints of the WVSP which is the law that would specifically prohibit their otherwise illegal project.

However, as an official Project Hearing Examiner in support of good, responsible urban design and planning practices alone, if the subject project application is forwarded to the Los Angeles City Planning Commission for their review, please emphasize the urgent need for the Commission's special attention to the issues of this proposed sunken plaza project. The responsibility for risk avoidance and prevention of such a costly urban design and development mistake should serve as the basis for withholding any further project approvals, and/or a halt in any further permit processing, with the stipulation that the entire sunken plaza element be eliminated from this applicant's project plans.

While we recognize many other difficult problems associated with this poorly-conceived project and the DEIR/FEIR process, we are confident that the Public Hearing Examination and review process will find and implement the most appropriate public procedure from this point forward. Please don't hesitate to call me at (310) 474-6418 or write to the address on this letterhead if there are any questions, or if we can assist you in way.

Thank you for your review and consideration of this important community development matter.

Respectfully submitted,



Michael S. Metcalfe  
Co-president, Save Westwood Village

Att: Annotated Background/Bibliography on Sunken Plazas, Pages 3 & 4 of 4.  
cc: The Honorable Laura Chick, Los Angeles City Council, CD 3  
The Honorable Michael Feuer, Los Angeles City Council, CD 5  
The Honorable Ruth Galanter, Los Angeles City Council, CD 6  
The Honorable Cindy Miskowski, Los Angeles City Council, CD 11  
The Honorable Richard Riordan, Mayor, City of Los Angeles

February 24, 1998

Mr. Dan O'Donnel, City Planning Project Hearing Examiner

Page 3 of 4

RE: CITY PLAN CASE NO. 96-0133-PA, et. seq. WESTWOOD PLANNING AREA

An Annotated Background/Bibliography on Sunken Plazas: The Urban Design and Planning Case Against Approval of Construction of Sunken Plazas in Westwood Village.

1. **Los Angeles City Council - Journal/Council Proceedings**  
 Tuesday, November 18, 1997, Council Chamber - Room 340, City Hall - 10 AM  
 Item No. (18) - 96-2106 / S1 / CDg  
 INFORMATION TECHNOLOGY and GENERAL SERVICES COMMITTEE REPORT relative to  
 Phase 2 of the Pre-Development Feasibility Study-Los Angeles Mall Revitalization Plan.  
 Referred To Public Works Committee - Roll Call #18
2. **Los Angeles Mall Revitalization Concept Plan**  
 Prepared for the City of Los Angeles Department of General Services;  
 Includes critique & analysis of failed sunken plaza and re-use "retrofit" construction cost budget  
 estimate and financial proforma benefits analysis;  
 Gensler and Associates / Architects, Lead Consultant,  
 in association with Asset Strategies Inc., 1995
3. **City of Los Angeles DESIGN OUT CRIME Guidelines**  
 Prepared by the Los Angeles Crime Prevention Through Environmental Design (CPTED)  
 Task Force as directed and established by the Los Angeles City Council,  
 Consisting of the following City Departments:  
 L.A. City Planning, Mr. F. P. Eberhard, Deputy Director and Task Force Chairman  
 L.A. Police Department, Crime Prevention Section  
 L.A. Community Redevelopment Agency  
 L.A. Department of Transportation  
 Department of Public Works  
 L.A. Housing Department  
 L.A. Building and Safety  
 Bureau of Street Lighting  
 Councilmember Laura Chick, 3CD  
 Ref: DESIGN RECOMMENDATIONS, NATURAL SURVEILLANCE: Visual Connection, page 8;  
 Guidelines preclude visual (sightline) obstruction between streets and public common areas;  
 Appendix B includes a very useful reference Bibliography  
 Published November 1997
4. **The Social Life of Small Urban Spaces**  
 by William H. Whyte, The Conservation Foundation, 1980  
 This seminal basic text of empirical research in the scholarship of urbanism is widely recognized  
 as fundamental, required reading for all students of the behavior of people in the urban  
 environment. For example, the book is required reading for applicants for graduate admission to  
 the Departments of Architecture, Urban Design, City and Regional Planning, and Landscape  
 Architecture and Environmental Planning at the College of Environmental Design at the  
 University of California at Berkeley, among many others.
5. **CITY: Rediscovering the Center**  
 by William H. Whyte, Doubleday, 1988  
 The sequel to the previous book includes further critique and analysis on the failures of sunken  
 plazas in urban commercial settings. This book documents the Street Life Project which provided  
 the basis for a PBS Network "Nova" science series documentary entitled *Public Spaces/Human*  
*Places* produced by WGBH in Boston, and includes a Digest of the New York City Open-Space  
 Zoning Provisions (Appendix A) and Mandating of Retailing at Street Level (Appendix B), both of  
 which serve to prohibit construction of sunken plazas in the city with the nation's highest  
 population density. The author includes acknowledgment of the participation and assistance of  
 Mr. Con Howe, Director of the Los Angeles Department of City Planning.
6. **Town and Square: From the Acquire to the Village Green**  
 by Dr. Paul Zucker, Columbia University Press, 1959  
 One of the classic urban planning and design references, Zucker's analysis demonstrates that  
 streets and squares (a.k.a. plazas) are functionally interdependent and inseparable, and require  
 unobstructed visual connection and unobstructed direct pedestrian access to be successful.



February 24, 1998

Mr. Dan O'Donnell, City Planning Project Hearing Examiner

Page 4 of 4

RE: CITY PLAN CASE NO. 98-0133-PA, et. seq. WESTWOOD PLANNING AREA

## An Annotated Background/Bibliography on Sunken Plazas: The Urban Design and Planning Case Against Approval of Construction of Sunken Plazas in Westwood Village.

7. Design Thinking  
by Peter G. Rowe, The MIT Press, 1988  
Presently the Dean of the Harvard Graduate School of Design, Mr. Rowe conducted a series of developmental case studies on instruction in the creative process of architecture, which found that "urban place making" and "urban form becomes more highly resolved" as the designer acknowledges "the public domain of the street".
8. Designing Urban Public Plazas  
by Jordan M. Rosenfeld, Urban Land, Journal of the Urban Land Institute (ULI), December 1997  
"The ability to enter a public plaza in the normal course of pedestrian movement is of immense importance to the way people use that space. Visibility and direct access from the other elements of the urban circulation system" (i.e. sidewalks & crosswalks) must be continuous. (page 53, emphasis added)
9. Mixed Use Development Handbook  
Another ULI publication, 1998  
A decidedly non-academic guide for commercial developers, advises that the (current) trend has been away from "insular design" in "an effort to offset the ill effects on surrounding activity", toward "open air people-oriented spaces" (page 182).
10. Redesigning City Squares and Plazas  
by Francisco A. Cerver, ARCO/Hearst Books International, 1997  
The author points out how sunken plazas can be deliberately designed to be "isolated from the rest of the city" in circumstances where such separation is the desired result, such as the recently completed Tokyo Town Hall Complex and Citizen's Plaza in Japan (page 189).
11. City of Quartz: Excavating the Future of Los Angeles  
by Mike Davis, Vintage Books, 1992  
Davis addresses the continuing, "piecemeal privatization" and "destruction" of the public realm "by de facto surrender to corporate-defined redevelopment priorities for elite enclaves" (page 227) and references the Hollywood Public Library with its "sunken entrance" as a prime example of deliberate disconnection and signal of separation and limited access from the local community (page 239).
12. The City: Los Angeles and Urban Theory at the End of the Twentieth Century  
Edited by Allen J. Scott and Edward W. Soja, University of California Press, 1996  
In Chapter 2, The First American City by Richard S. Weinstein, following a quote of Elias Canetti, author of *Crowds and Power*, addressing (American) corporate power and bureaucratic routine as expressed in the towers and plazas of New York City, Professor Weinstein notes: "These dangerous and deadening expressions of routine are antiurban and as threatening to the public realm in the city, where they destroy the life of the street, as they are when they support the fragmentation of the extended city, where the street doesn't matter at all." In sum, if not checked and advised of the consequences in advance, the unconstrained joint forces of corporate power and bureaucratic routine will predictably co-opt and consume whatever it can of the public realm.

The above represent just a small sample of the body of urban design and planning literature warning against the risks and problems of sunken plazas. There are also many experienced professionals who have commented based on their respective experiences with sunken plaza projects. Several such letters of testimony in opposition to sunken plazas have been previously submitted to the above referenced L.A. City Planning Case Files, copies of which are available on request. Please call (310) 474-6418.

GLENDON MANOR - LETTERS FROM ORGANIZATIONS

Center For  
Preservation Education  
& Planning

A Public Benefit Corporation, Founded 1994

Jeffrey B. Samudio, Executive Director

The Hollywood Building  
6404 Hollywood Boulevard, Suite 414  
Hollywood, California 90028-6241  
823 962 4585 Voice  
823 962 8280 Fax  
jbs@ozsignald.net

15 November 2001

Councilmember Jack Weiss  
City Hall  
200 North Spring St., Room 440  
Los Angeles, CA 90012

Re: Glendon Manor, Westwood Village

Dear Councilmember Weiss:

I understand that the Glendon Manor apartment building in Westwood Village is located in your council district. I am writing because this historically significant building is now being threatened with destruction.

Having served as a member of the State Historical Resources Commission for several years, including during the period when Glendon Manor was considered and determined eligible for listing in the California Register of Historical Resources, I would like to give you some background on the process by which this building was determined eligible for listing in the California Register of Historical Resources.

I am also a past president of the Society of Architectural Historians/Southern California Chapter. In addition to my role as Executive Director of the Center for Preservation, Education and Planning, I maintain an active professional practice as an architectural historian and cultural resource planner. I hold undergraduate and graduate degrees in architecture and urban planning.

Glendon Manor was the first building directly nominated to the California Register of Historical Resources. The California Register was established in 1996. Regulations adopted in 1998 permitted direct nomination to the Register for the first time. Until then, only resources which had previously qualified under national or local standards were listed in the State.

As the first direct nomination, Glendon Manor underwent an especially rigorous assessment when it was considered in 1998. Copious material was submitted by both the proponents and the opponents to designation. In addition, the State Historical Resources professional staff conducted its own independent archival research, actually visited the site, and undertook an extraordinary two-tier internal review before finalizing their recommendations to the Commission.

The State Commission held a lengthy public hearing in November 1998 at which many witnesses were heard for both sides, including presentations by professional experts and testimony by the owner of the building who personally appeared. This building was again considered at two subsequent meetings of the Commission, and the owner's objections carefully considered, before the formal findings were adopted by the Commission at a public hearing in April 1999 in which the owner was again represented. Ultimately, the owner chose not to request a redetermination of the Commission's decision.

Glendon Manor's historical significance is detailed in the State Commission's findings of fact. It was found to be significant under not just one, but two, different criteria:

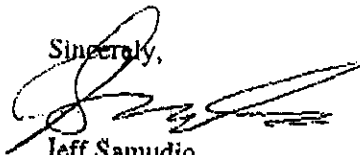
1. Under California Register Criterion 1, for its association with the development of Westwood Village as a planned community specifically designed to serve UCLA when the campus was moved from its urban location to this then-suburban setting. An early example of multi-unit residential space amid commercial, entertainment, and recreational uses, Glendon Manor is evidence of a forward-looking planning concept, the "new town" or planned "village" designed to support an important civic institution.

2. Under California Register Criterion 3, for its embodiment of a period revival style, Mediterranean Revival -- a style the Jaus Company, the original developer of Westwood Village, mandated for many of Westwood's buildings. While Glendon Manor has its own significant character-defining features that have made it a Village landmark, it gains additional significance as an important contributing element to the Jaus village architectural composition.

I urge you to take whatever steps are necessary to preserve this important resource, which is an integral part of the unique role Westwood Village holds as the only true "village" in the City of Los Angeles, for future generations of Californians.

Please call me if you have any questions or would like to meet to further discuss this matter.

Sincerely,



Jeff Samudio  
Executive Director

cc: Mayor James Hahn  
Rocky Delgadillo, City Attorney  
Councilmember Cindy Miscikowski  
Councilmember Ruth Galanter  
Ken Bernstein, Los Angeles Conservancy

**WESTWOOD HISTORICAL SOCIETY**

10956 Weyburn Avenue, Suite 200A

Los Angeles, California 90024

December 4, 2001

Councilmember Jack Weiss  
200 N. Spring Street, Room 440  
Los Angeles, CA 90012

**Re: Glendon Manor  
1070 Glendon Avenue  
Westwood Village**

Dear Councilmember Weiss:

We are very concerned about the current situation of the Glendon Manor apartment building in Westwood Village. Not only have recent owners shamefully neglected this significant building, but also the current owners are systematically emptying the building of tenants through eviction and other means. Recently, with a couple of tenants still living there, the building has been boarded up and it is clear that the owners' ultimate goal is demolition.

The Westwood Historical Society (AKA Westwood-Holmby Historical Society) was formed in 1989 as a non-profit, public benefit corporation, dedicated to promoting awareness of the unique architectural and cultural heritage of the Westwood-Holmby community, originally the Rancho San Jose de Buenos Ayres. We were very pleased to be able to cooperate with you earlier this year on the preservation efforts for Chateau Colline on Wilshire Boulevard. I look forward to working with you and your staff on preservation efforts for Glendon Manor, which is of far greater historic significance because of its close association with the creation of Westwood Village and the establishment of the UCLA campus here in 1929.

In 1998, Glendon Manor was determined eligible by the State for listing in the California Register of Historical Resources. We enthusiastically supported the nomination of Glendon Manor to the California Register. Glendon Manor was the first apartment building built in Westwood Village in 1929. It is now the last remaining residential building in the Westwood Village Specific Plan area from the original Janss era. For more than 30 years, it was the tallest building in the Village and a well-known visual landmark.

Glendon Manor was cited by the State for its place in the Janss Development Co.'s forward-looking planning concept, the "new town" or planned "village" designed to support an important civic institution. Additionally, it embodies a period revival style, Mediterranean Revival, which was mandated by the Janss Company as part of its vision in creating an architecturally integrated village center for UCLA and the surrounding homes, thematically appropriate to the Southern California environment.

The building is now seriously threatened. The current owners seek to demolish it as part of a new project. We ask you to ensure that if the City approves a new project, it requires the owners to preserve Glendon Manor as one of the conditions of entitlement. More pressing at this time, however, are the real risks in

leaving this building empty and boarded up while a new project winds its way through the entitlement and financing process, which may take a couple of years. As a former prosecutor, you can appreciate how such an abandoned and dilapidated structure blights a neighborhood and becomes a magnet for crime. In addition, the building becomes a target for vandalism and arson that, if it were to substantially destroy the building, would render moot any requirement to preserve Glendon Manor.

Because of this very real risk of premature destruction, we also ask that the City impose a further condition on entitlement that would require the owners to replicate the building should it happen to be irreparably destroyed prior to the new project's being built. This will hopefully give the owners an incentive to ensure that the building is protected while it stands empty—or better yet, to keep it occupied and maintained until the project financing is actually in place and they are ready to build.

I know that many others in our community are also concerned about Glendon Manor, and we would be happy to attend a meeting with you to consider various approaches to protecting this important Westwood resource.

Thank you.

Sincerely,

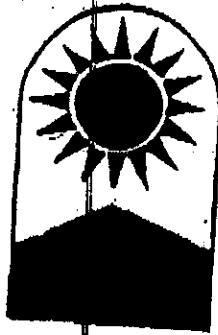


Carolyn Mannon Haber  
President

cc: Mayor James K. Hahn  
Rocky Delgadillo, City Attorney  
Councilmember Ruth Galanter  
Councilmember Cindy Miscikowski  
Ken Bernstein, L.A. Conservancy

September 13, 2001

Councilman Jack Weiss  
City Hall  
200 N. Spring Street, Room 440  
200 N. Spring Street  
Los Angeles, Ca., 90012



Dear Councilman Weiss:

Re: Glendon Manor, Westwood Village

I am writing on behalf of the Holmby-Westwood Property Owners Association concerning the current unsatisfactory situation involving the historic Glendon Manor apartment building at 1070 Glendon in Westwood Village.

Our Association represents the 1100 home single family residential community east of the Village, and adjacent to the Glendon Manor site.

We were proud to support the nomination of Glendon Manor to the State of California Register of Historical Resources in 1998, in spite of fierce opposition by then owner Ira Smedra, and then Councilman Mike Feuer.

The State determined that this building was eligible for the State Register because of its close connection with the establishment of UCLA, and a key multi-family element of the Janss Company's pioneering "new town" concept. Unfortunately, the recent series of owners have neglected to maintain this historic Westwood resource.

Sometime last year, a new or additional owner, Alan Casden, seems to have entered the picture. He acquired his interest in this property knowing that it was historical. We understand he wants to demolish the building for a proposed (and problematic) development project called PALAZZO.

The remaining Glendon Manor tenants have been given eviction notices and work has begun to board up the building. Glendon Manor, in addition to a historic site, is one of the few affordable housing rental buildings in Westwood. The loss of this affordable housing multi-family building will compound the existing severe citywide shortage of affordable housing. It's unclear how much of the proposed PALAZZO project will be required to be dedicated to affordable and or senior housing.

More troubling, however, is the blight that an abandoned building creates, and the crime it naturally attracts, not to mention the potential for vandalism and arson, which can negate any City requirement for preservation of the building.

We are concerned that an empty building of this size, if it is further allowed to deteriorate, will blight a charming street in the Village, and create a serious health and safety nuisance for adjacent residents.

We are anxious to know what you, as Westwood Village City Councilmember, will do to prevent this building and situation from deteriorating, and whether or not you support the preservation of this site as a historic site for affordable housing.

We'd like to suggest some positive steps:

- An effort by the City Housing Department to acquire, improve and preserve the site for affordable housing, especially senior housing.
- Arrange for the city building inspection department and the City Attorney's office to closely monitor and enforce the preservation of the physical condition of the building.

- Enact a city-wide moratorium to become effective, and retroactive to include Glendon Manor, that becomes effective on the dates of eviction notices are served to tenants in historic designated buildings threatened with demolition, until :

there is certification that proposed new project for the site is fully entitled and financed, in order to prevent unnecessary evictions and demolition of affordable housing for a proposed project that never gets built.

- In connection with the proposed PALAZZO project, that any designated historical building on the site be incorporated within the project and preserved as part of the project, and that if the historic building is destroyed, whether "accidentally" or otherwise, before the new project is completed, that the historic building be replicated as part of the new project.

Thank you for your prompt attention to this matter further. We look forward to an early reply.

Please call if you would like to discuss the matter

Yours truly

*Tom Paterson*

For Sandy Brown, President  
By Tom Paterson, Office Manager  
Holmby-Westwood Property Owners Association

CC: Mayor James Hahn  
City Attorney Rocky Delgadillo  
Councilmember Cindy Miscoikowski  
Councilmember Ruth Galanter  
Ken Bernstein, Los Angeles Conservancy





## *Westwood Hills Property Owners Association*

*incorporated 1958*

P.O. Box 24515

Los Angeles, California 90024

November 27, 2001

Councilmember Jack Weiss  
200 N. Spring Street, Room 440  
Los Angeles, CA 90012

Re: Glendon Manor, 1070 Glendon Avenue, Westwood Village

Dear Councilmember Weiss:

The Westwood Hills Property Owners Association is the homeowners association of the more than 600 families who own single family homes in the area west of Westwood Village.

We are writing because of our concern about the current status and the ultimate fate of the Glendon Manor apartment building in Westwood Village, which was designated historic by the State of California in 1998.

We strongly supported the nomination of this building to the California Register of Historical Resources. Glendon Manor was the first apartment building in Westwood Village, built in 1929 to support the founding of the UCLA campus here, and now is the only remaining residential building in the Westwood Village Specific Plan area from that original Janss era.

Our Association's board of directors voted unanimously at its last board meeting to take all steps necessary to ensure that this building is preserved for future generations.

We are especially alarmed that the current owners are evicting the remaining tenants and boarding up the building. We understand that they want to demolish the building as part of a large new development. The details of this development have not been made public, and depending on its ultimate form such development may be far from final approval. In addition, given the current economic climate, the developers may not even be able to get financing for many months or years, if at all.

Councilmember Jack Weiss  
November 27, 2001  
Page 2

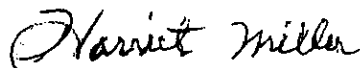
An empty boarded-up building is a blight on the surrounding neighborhood and a magnet for crime, even when it is not historic. Further, allowing Glendon Manor to languish in this abandoned state increases the risk that fire or vandalism will destroy the building. That would make any intent by the City to require preservation as part of the EIR process totally irrelevant.

The threat is therefore immediate because of the evictions, as well as longer-term in requiring preservation as part of the new project.

We urgently ask the City to do everything possible to safeguard this important Westwood historical resource for the future. We would appreciate your letting us know what steps you propose to take in this regard.

Thank you.

Sincerely,



Harriet Miller,  
President, Westwood Hills  
Property Owners Association

cc: Mayor James Hahn  
City Attorney Rocky Delgadillo  
Councilmember Cindy Miscikowski  
Councilmember Ruth Galanter  
Ken Bernstein, Los Angeles Conservancy

# Westwood Homeowners Association

% Richard D. Agay, 16661 Ventura Blvd., Penthouse, Encino, CA 91436-1914  
• Telephone: (818) 986-2569 • Fax: (818) 783-9638

December 12, 2001

IN REPLY PLEASE REFER TO:

Councilperson Jack Weiss  
200 N. Spring Street  
Suite 440  
Los Angeles, CA 90012

**Re: Glendon Manor**

Dear Councilman Weiss:

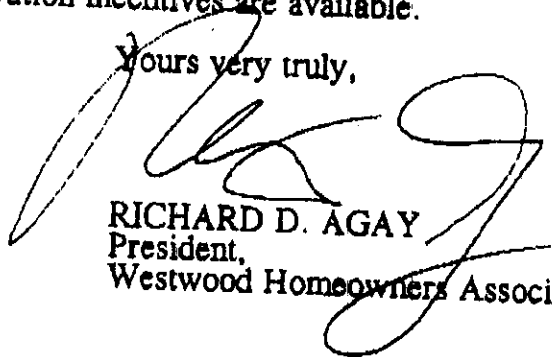
Preservation of the historic Glendon Manor apartment building, located at 1070 Glendon Avenue in Westwood Village needs your help.

In 1998 the building was determined to be eligible for listing in the California Register of Historical Resources.

Our fear that the current owners propose to demolish the building is generated from recent evictions and boarding up of the building. Of course this creates a blight on the neighborhood, if not an attraction for criminal activity.

If the City is going to approve any project on the site, Glendon Manor should be preserved. For such preservation incentives are available.

Yours very truly,

  
RICHARD D. AGAY  
President,  
Westwood Homeowners Association

RDA/vrm

cc: The Honorable James K. Hahn  
City Attorney Rocky Delgadillo  
Councilperson Ruth Galanter  
Councilperson Cindy Miscikowski  
Mr. Ken Bernstein, Los Angeles Conservancy

President: Richard Agay

Vice-President: Bill Wagner

Secretary: Neil Jacoby, Jr. • Treasurer: Arnold Anisgarten

Directors: Richard Agay, Arnold Anisgarten, Jan Beumer, Ben Campisi, Charles Edelsohn, Ivan Finkle,  
Neil Jacoby, Jr., Mike Metcalfe, Nancy Myers, Howard Singer, Jon Sobieski, Bill Wagner

# north village improvement committee

[www.yournorthvillage.org](http://www.yournorthvillage.org)

310.208.8007

310.824.0732fax

p. o. box 49700

los angeles, california 90049

**Shelley Taylor**  
Founder, Managing Director

**Brad Fagerstrom**  
Director

December 21, 2001

Councilmember Jack Weiss  
200 No. Spring Street, Room 440  
Los Angeles, CA 90012

Re: Glendon Manor  
1070 Glendon Avenue  
Westwood Village

Dear Councilmember Weiss:

What sets Westwood Village apart if not its history? Without preserving that which makes it unique in a cookie-cutter world, Westwood Village becomes just another outdoor shopping mall with no particular incentive to beckon shoppers and residents.

Glendon Manor is not only a part of Westwood Village's history, it is directly tied to the creation of the Village itself and, too, the UCLA campus. As an original component of the Village, and the first apartment house built here, it has earned its listing in the California Register of Historical Resources.

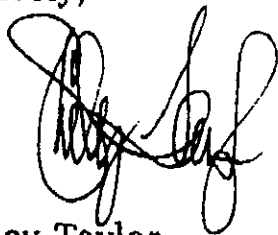
Mr. Alan Casden is first and foremost a businessman, and a businessman's first priority is to make a profit. Mr. Casden has no allegiance to the residents of Westwood. No matter that Glendon Manor has been sited as an historical structure, if not *required* to preserve it, *he will demolish this landmark at his earliest opportunity*. Believe me, it will be his *first* priority - if for no other reason than to end this controversy which he feels hinders his progress.

Of what purpose are ordinances and laws if money is the true influence when it comes to the desires and needs of residents and the direction of a community?

Westwood's calling card is exemplified by its architecture. I see no reason whatsoever that Mr. Casden cannot work with this historic structure and *still* accomplish his goals. I am aware there is a long list of possible alternatives to Glendon Manor's complete destruction. If I am not mistaken, Mr. Casden's plans call for the inclusion of residences. Why build a new structure when Glendon Manor already exists? There are plenty of individuals who would love to call this historic building home; becoming a resident there would most definitely hold a certain cache. There was talk during the renovation of the Bullock's property of including art galleries. Why not create artists lofts, residences and galleries - a unique use which would certainly create some buzz for Mr. Casden's project?

I urge you to please use your influence to insure that the qualities that make Westwood special are not chipped away.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shelley Taylor', with a stylized, cursive script.

Shelley Taylor  
Managing Director  
north village improvement committee

cc:

Mayor James K. Hahn  
councilmember Cindy Miscikowski  
Ken Bernstein, Dir. Preservation Issues  
Rocky Delgadillo, City Attorney  
Councilmember Ruth Galanter

# COMPARISON CHART OF VILLAGE STREET TRAFFIC

AIMCO/Casden Project - Palazzo Westwood  
VILLAGE STREETS  
per Draft EIR, p. 208-210

Village Street	Daily Traffic Count	Current Designation	Notes
Westwood Blvd.	33,000	Major Class II Highway	
Gayley Ave.	27,800	Secondary Highway	
Glendon Ave. (between Kinross & Weyburn)	7,200+	Local Street	1/10/97 DOT memo: 8,600; Smedra EIR (1995-96 traffic studies): 7,200
Lindbrook Ave.	6,500	Local Street	
Kinross Ave.	4,400	Local Street	
Tiverton Ave.	3,600	Secondary Highway	
LeConte Ave.	3,000	Secondary Highway	
Weyburn Ave.	1,900	Local Street	

MEMO DATED 1/10/97 FROM ALLYN RIFKIN



CITY OF  
INTER-DEPARTMENT

Post-It™ brand fax transmittal memo 7671		# of pages > 17
To: Jackie Friedman	From:	
Co.	Co.	
Dept.	Ph:	
Fax # (310) 253-5721	Fax #	

Date: January 10, 1997

To: Darryl Fisher, Deputy Advisory Agency  
Department of City PlanningFrom: Allyn D. Rifkin, Principal Transportation Engineer  
Department of TransportationSubject: INITIAL TRAFFIC ASSESSMENT FOR THE VILLAGE CENTER  
WESTWOOD

The Department of Transportation (DOT) has completed a review of the projected traffic impacts for the proposed Village Center Westwood project. The proposed project in Westwood Village is a 387,711 square-foot mixed-use commercial development along Glendon Avenue between Weyburn and Kinross Avenues and a 242-unit seniors-only residential complex along Tiverton Avenue, also between Weyburn and Tiverton Avenues. The project requires the vacation of the segment of Glendon Avenue between Weyburn and Kinross Avenues.

**SUMMARY**

The Department's initial traffic assessment was based on the traffic study dated July 1996 prepared by Crain and Associates and further updated in October 1996. After a preliminary review of the pertinent data, DOT has determined that the traffic study, as further revised, adequately describes the project-related traffic impacts.

While DOT is charged with the responsibility for reviewing mitigation measures based upon congestion relief and safety, urban design objectives are also important. Because of the historical nature of the Westwood Village and in consideration of the Westwood Village Specific Plan, the Councilman for Council District 5 appointed a Citizen Review Panel to further comment on the desirability of the initial proposed mitigation measures. The Citizen Review Panel tempered the list of physical mitigation measures and reduced the number of intersections which initially were thought to have been mitigatable. To respond to other concerns expressed by the Citizen Review Panel of this project, the traffic consultant has been requested to perform a supplemental traffic analysis of the project impacts assuming more conservative estimates of project trip generation with lower discounts for pass-by/internal linkage. That supplemental analysis has not been reviewed in detail.

DOT has determined that of 33 studied intersections, the proposed project will have significant traffic impacts at fifteen (15) intersections. After a review of proposed mitigation measures by DOT for technical feasibility and a secondary review by a Citizen Review Panel for urban design impacts, it is reported that ten (10) of these fifteen impacts can be

mitigated to a level of insignificance through a combination of street improvements and trip reduction programs which would include a commitment to an extensive shuttle program.

The cost of the shuttle program is estimated at \$2 million capital cost and \$600,000 per year operating cost based upon a fleet of small buses sufficient to carry approximately 760 passengers during the peak hour. Assuming one-half of the riders would have driven cars - 380 pm peak hour vehicle trips (16 percent of the unadjusted gross pm peak hour trips) were removed from the impacts of the proposed project. It is proposed that the applicant purchase the vehicles, operate the shuttle and guarantee its operation through a renewable guarantee (bond or letter of credit) in the amount of \$800,000 which is approximately the amount of 380 trips times the current proposed Westwood/WLA Traffic Impact Fee of \$2,110 per trip. The operation of the vehicles shall be for 5 years with annual reports on its ridership. If, at the end of 5 years, the peak hour ridership, on a typical weekday, falls short of the 380 peak hour vehicle trip reduction (i.e., 760 peak hour passengers), then the applicant shall pay the difference in vehicle trips according to the adopted Traffic Impact Fee. The fee payment will then be used for additional off-site mitigations to the satisfaction of the Department of Transportation in accordance to the Westwood/WLA Traffic Impact Mitigation Program. Under this scenario, the operation of the shuttle will rely on alternative funding after the first 5 years of operation by the applicant.

DOT notes that the closure and vacation of Glendon Avenue would have significant impacts irrespective of the project. Although the applicant's traffic study demonstrates acceptable levels of service (using 1996 peak hour data) under the assumption that most of the diverted traffic would be diverted to underutilized parking areas to the west, impacts to Hilgard Avenue are likely as well and are exacerbated by the preference to keep Tiverton Avenue operating as a one-way street. DOT would not recommend approval of the street closure without corresponding mitigation measures. The applicant's mitigation measures address the impacts of the diverted traffic.

With respect to on-site parking, the project will provide approximately 2,500 parking spaces. In consideration of the shared use of parking expected for this mixed use project, the proposed parking is in excess of the parking requirements of the Westwood Village Specific Plan. Provision of this amount of parking will minimize parking impacts on surrounding residential streets. On the other hand, the affect of abundant, easy-to-access parking on the viability of the shuttle system has not been evaluated.

The project is located within the geographic area subject to the Westwood/West Los Angeles Interim Traffic Control Ordinance (ICO Ordinance No. 171,227). A replacement ordinance is under consideration by City Council. The replacement ordinance would require the payment of a traffic impact fee in addition to any requirements described in this report. This report does not address the magnitude of that fee nor any consideration of in-lieu credits against the fee for traffic mitigation measures which may be adopted in the final project approval.

The Department of Transportation recommends the following conditions on the project. Prior to the issuance of any building permit(s), the applicant must:

- o pay the application/traffic study review fee of \$2,280.
- o sign and record a Covenant and Agreement pursuant to Ordinance No. 171,227.
- o guarantee the funding of neighborhood traffic protection plans.
- o submit final designs for approval and guarantee the transportation improvements listed herein to mitigate the project-related traffic impacts.
- o guarantee the implementation of a trip reduction/shuttle program and coordinated parking management program.

Given the number of unmitigated traffic impacts, the feasibility of a reduced size project should also be explored. A smaller project could be expected to have reduced impacts and potentially would require less transportation mitigation.

## DISCUSSION

The proposed Village Center Westwood project is a 387,711 square foot mixed-use project consisting of approximately 163,803 square feet of retail space; 50,000 square feet of supermarket; 45,720 square feet of restaurant uses; a 4,700-seat cineplex complex; and a 242-unit seniors-only apartment complex. The site is currently occupied by a 652-seat theater, approximately 24,400 square feet of retail, a 42-unit apartment complex and two surface parking lots. The proposed project will generate a total of 379 trips in the a.m. peak hour and 2,242 trips in the p.m. peak hour. Considering the existing/replaced uses the project will generate 314 and 1,974 new trips respectively in the a.m. and p.m. peak hours. For evaluation of street impacts and being consistent with practices recommended in the Institute of Transportation Engineers (ITE) Trip Generation Handbook, the Department of Transportation has authorized reductions in the trip generation rates to account for internal linkages (due to the mixed use nature of the project) and pass-by discounts (to account for vehicles already on the road which stop for convenience purchases). These discounts, summarized in Attachment A, resulted in the assessment of 159 and 1,065 vehicle trips in the a.m. and p.m. peak hours respectively. The discounts included in the analysis are within the levels reported in surveys on-file with ITE and are recommended as reasonable analysis by DOT. The Citizen Review Panel had concerns with those assumptions and requested a more conservative analysis which should be included in the DEIR.

DOT has determined that of 33 intersections studied, the proposed project will have significant traffic impacts at the following fifteen (15) intersections:

1. Weyburn Avenue and Gayley Avenue
2. Lindbrook Drive and Westwood Boulevard
3. Weyburn Avenue and Tiverton Avenue
4. Wilshire Boulevard and Sepulveda Boulevard
5. Lindbrook Drive and Tiverton Avenue and Glendon Avenue
6. Kinross Avenue and Glendon Avenue
7. Veteran Avenue and Gayley Avenue and Montana Avenue
8. Sunset Boulevard and Hilgard Avenue/Copa de Oro
9. Weyburn Avenue and Westwood Boulevard
10. Kinross Avenue and Westwood Boulevard and Broxton Avenue
11. Weyburn Avenue and Hilgard Avenue
12. Wilshire Boulevard and Veteran Avenue
13. Wilshire Boulevard and Gayley Avenue
14. Wilshire Boulevard and Westwood Boulevard
15. Sepulveda Boulevard and Montana Avenue

After review of the proposed feasible mitigation measures, DOT has determined that the project can fully or partially mitigate its project-related traffic impacts as described below. These mitigations are based upon the Citizen Review Panel review of the measures with regards to urban design principles. Consequently, some initially proposed roadway widenings have been eliminated from this mitigation list.

Number of Intersections	Type of Mitigation
2	Mitigated through street widenings, traffic signal improvements, re-striping and other street modifications
1	Mitigated through trip reduction/shuttle program
7	Combination of both street modifications and trip reduction/shuttle program
3	Partial mitigation - through trip reduction/shuttle program
2	No feasible mitigation measures

As indicated in Attachment B, a summary of volume-to-capacity (V/C) ratios and levels of

service (LOS) at the study intersections, the project-related traffic impacts at ten (10) of the impacted intersections can be reduced to a level of insignificance. Five of the impacted intersections remain unmitigated.

### **GLENDON AVENUE CLOSURE**

The proposed project, as presented, requires the closure and vacation of Glendon Avenue between Weyburn Avenue and Kinross Avenue. Currently, Glendon Avenue serves 8,600 vehicles per day on a weekday and 5,000 to 7,000 vehicles per day on a weekend day. Glendon Avenue, along with Gayley Avenue and Westwood Boulevard, provides one of three access points from Wilshire Boulevard to Westwood Village. In addition, much of the east-west traffic utilizes Glendon Avenue for circulation because the surrounding residential areas, the San Diego Freeway, UCLA, and the Veteran's Cemetery severely limit the east-west traffic to Sunset Boulevard or Wilshire Boulevard.

Glendon Avenue becomes an even more important alternate north-south access to the east Village area when Westwood Boulevard becomes congested. And because of the existing one-way northbound operation on Tiverton Avenue between Lindbrook Drive and Weyburn Avenue, the southbound traffic exiting the UCLA Medical Center must utilize either Glendon Avenue or Hilgard Avenue. Tiverton Avenue is also an emergency access to the UCLA Medical Center.

Much of the existing Glendon Avenue traffic is seeking parking which currently exists in the area (both on and off the street). The vacation of Glendon Avenue would cause secondary impacts in the loss of approximately 34 on-street and 555 off-street parking spaces. The applicant proposes to mitigate the parking impact by adding to its own off-street parking facilities. The traffic study also references a recent survey of off-street parking with a note of underutilized parking lots west of Westwood Boulevard.

Attachment C is a summary of future year (Year 2000) impacts of the street closure without the proposed project. Notwithstanding the project-generated trips and related impacts, DOT has determined that the Glendon Avenue closure alone would cause significant traffic impacts at the following six (6) intersections:

1. Weyburn Avenue and Westwood Boulevard
2. Weyburn Avenue and Tiverton Avenue
3. Kinross Avenue and Westwood Boulevard and Broxton Avenue
4. Lindbrook Avenue and Westwood Boulevard
5. Lindbrook Avenue and Hilgard Avenue
6. Wilshire Boulevard and Westwood Boulevard

The project mitigations discussed mitigate each of these intersections except Wilshire and Westwood Boulevard.

**PROJECT MITIGATIONS**

Pursuant to the Westwood/West LA Interim Traffic Control Ordinance, mitigation of project-related traffic impacts is a necessary condition prior to the issuance of any building permit. DOT has determined that the project can fully mitigate impacts of its trips and the action of vacating Glendon Avenue at ten (10) of the intersections and partially mitigate its impacts at three (3) intersections through a trip reduction program of areawide shuttles, as described below. No feasible mitigation measures are available at two (2) of the impacted intersections.

**A. Physical Transportation Improvements****1. Weyburn Avenue and Gayley Avenue**

Implement the shuttle.

**2. Lindbrook Drive and Westwood Boulevard**

a. Prohibit northbound and southbound left turns by posting "No Left Turn" signs.

b. Implement the shuttle.

**3. Weyburn Avenue and Tiverton Avenue**

a. This intersection is currently controlled by an all-way stop sign. The project-related impact at this intersection would require traffic signal control for the safe and efficient movement of traffic. The applicant is required to fund the design and installation of a traffic signal at this intersection. (Note: DOT also will require a traffic signal at the northerly driveway along Weyburn Avenue and has found that both signals could be coordinated).

b. Remove the raised pavement/trafficdiverter located on the southwest corner of Weyburn Avenue and Tiverton Avenue and restripe Tiverton Avenue to provide a left-turn only lane, a through lane and a right-turn only lane in the northbound direction.

c. Widen Weyburn Avenue along project frontage by 12 feet between Glendon Avenue and project driveway to provide a deceleration lane in the eastbound direction.

- d. Implement the shuttle.

Note that the DOT proposed additional minor widenings of Weyburn Avenue (northside) and Tiverton Avenue (northerly of Weyburn Avenue) were rejected by the Citizen Review Panel. These widening may be necessary to provide acceptable level of service for the new traffic signal. The improvement as proposed will cause the loss of approximately 20 on-street parking spaces on Tiverton Avenue and 34 spaces on Weyburn Avenue.

4. Wilshire Boulevard and Sepulveda Boulevard

Widen and improve the east side of Sepulveda Boulevard by four feet from Wilshire Boulevard to a point approximately 315 feet southerly of the centerline of Wilshire Boulevard to provide a 34-foot half roadway within the existing 42-foot half right-of-way. Restripe Sepulveda Boulevard to provide a left-turn only lane, two through lanes, and a right-turn-only lane in the northbound direction.

5. Lindbrook Drive and Tiverton Avenue and Glendon Avenue

- a. Widen and improve the north side of Lindbrook Drive by two feet from Tiverton Avenue to a point approximately 220 feet easterly thereof to provide 30-foot half roadway within the existing 40-foot half right-of-way. This requires narrowing the sidewalk on the north side of Lindbrook Drive from 12 feet to 10 feet.
- b. Restripe Lindbrook Drive to provide a left-turn only lane and a shared through/right-turn lane in the westbound direction and a left-turn only lane, a through lane and a shared through/right-turn only lane in the eastbound direction.
- c. Implement the shuttle.

6. Kinross Avenue and Glendon Avenue

- a. Currently, this intersection is controlled by a three-way stop sign. The project-related impact at this intersection would require traffic signal control for the safe and efficient movement of traffic. The Applicant is required to fund the design and installation of a traffic signal at this intersection.
- b. Restripe Glendon Avenue to provide a shared left-turn/right-turn lane and a right-turn only lane in the northbound direction. Restripe

Kinross Avenue to provide one left-turn and one right-turn-only lane in the eastbound direction.

- c. Implement the shuttle.

This improvement will cause the loss of approximately 8 on-street parking spaces on Glendon Avenue.

7. Veteran Ave and Gayley Ave/Montana Ave

No acceptable physical mitigation measure.

(Note DOT originally proposed the widening of the north side of Gayley Avenue by five feet from Veteran Avenue to a point approximately 235 feet easterly thereof to provide a 25-foot half roadway within the existing 35-foot half right-of-way. This requires narrowing the sidewalk on the north side of Gayley Avenue from 15 feet to 10 feet. Restripe Gayley Avenue to provide for a shared left-turn/throughlane and a right-turn only lane in the westbound direction. The Citizen Review Panel rejected this proposal because of impacts to pedestrian facilities.

8. Sunset Boulevard and Hilgard Avenue/Copa de Oro Drive

Widen Copa de Oro north of Sunset Boulevard and re-stripe to install 1 left turn lane and one shared thru/right turn lane in the southbound direction. This specific design of this proposal has not been approved by the Department of Transportation.

(Note the DOT proposed widening of the south side of Sunset Boulevard west of Hilgard Avenue was rejected by the Citizen Review Panel because of the impact to existing landscape in the parkway).

9. Weyburn Avenue and Westwood Boulevard

- a. Modify median islands on both legs of Westwood Boulevard to provide for exclusive left-turn only lanes for both northbound and southbound directions.
- b. Restripe Westwood Boulevard to provide one left-turn only lane, two through lanes, and one shared through/right-turn lane in the southbound direction; and a left-turn only lane, one through lane and a shared through/right-turnlane (19 foot curb lane) in the northbound direction.



- c. Implement the shuttle.

10. Kinross Ave and Westwood Boulevard and Broxton Avenue

This recommendation is based on the recently approved contract to construct the Westwood Village Streetscape improvements at this intersection.

- a. Reconstruct median islands on both north and south legs of Westwood Boulevard. Restripe Westwood Boulevard to provide a left-turn-only lane, one through lane, and a shared through/right-turn only lane in the northbound direction; and a left-turn only lane, two through lanes, and a shared through/right-turn lane in the southbound direction.
- b. Widen Kinross Avenue between Westwood Boulevard and Broxton Avenue by ten feet on the north side to provide a 28-foot half-roadway within the existing right-of-way. Restripe Kinross Avenue to provide a shared left/through lane and a shared through/right-turn lane in the westbound direction.
- c. Implement the shuttle.

11. Weyburn Avenue and Hilgard Avenue

- a. Widen the south side of Weyburn Avenue west of Hilgard Avenue by six feet between Hilgard Avenue and 225 feet westerly to provide a 26-foot half roadway within the existing 35-foot half right-of-way. This requires narrowing the sidewalk on south side of Weyburn Avenue from 15 feet to 9 feet. Restripe Weyburn Avenue to provide a left-turn only lane and a right-turn lane in the eastbound direction.
- b. Restripe Hilgard Avenue to provide a through lane and a right-turn-only lane in the southbound direction; and a left-turn only lane and a through lane in the northbound direction.
- c. Install a partial cul-de-sac on Weyburn Avenue (east leg) to prohibit eastbound entry to Weyburn Avenue.
- d. Implement the shuttle.

12. Wilshire Boulevard/Veteran Avenue

Implement the shuttle.

13. Wilshire Boulevard/Gayley Avenue

Implement the shuttle.

14. Wilshire Boulevard/Westwood Boulevard

Implement the shuttle.

15. Sepulveda Boulevard and Montana Avenue

No acceptable physical mitigation measure.

(Note DOT originally proposed to relocate the existing bus stop/zone on the north side of Montana Avenue to the east side of Sepulveda Boulevard north of Montana Avenue. This improvement would cause the loss of approximately 4 on-street parking spaces. The Citizen Review Panel felt this loss of parking on residential frontage was unacceptable.)

The required street improvements including modification and relocation of traffic signals, street lights, power poles, street trees, storm drains, utilities, etc. on City streets must be guaranteed before the issuance of any building permit through the B-Permit process of the Bureau of Engineering, Department of Public Works and completed before the issuance of any Certificate of Occupancy, to the satisfaction of the Department of Transportation and Department of Public Works. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor to contact DOT's B-Permit Coordinator at (213) 580-5320 to arrange a pre-design meeting to finalize the proposed design for transportation improvements.

**B. Trip Reduction/Shuttle and Parking Management Program**

In addition to the physical measures described above, an enforceable employee, ride-sharing program and a customer-based public bus shuttle are required to remove trips from the impacted intersections. DOT has determined that a Shuttle Program will contribute to the mitigations at the following eleven (11) intersections:

- |  |              |
|--|--------------|
| 1) Weyburn Avenue and Westwood Boulevard         | (complement) |
| 2) Weyburn Avenue and Tiverton Avenue            | (complement) |
| 3) Weyburn Avenue and Hilgard Avenue             | (complement) |
| 4) Kinross Ave., Westwood Blvd. and Broxton Ave. | (complement) |
| 5) Kinross Avenue and Glendon Avenue             | (complement) |
| 6) Lindbrook Dr., Tiverton Ave. and Glendon Ave. | (complement) |
| 7) Weyburn Avenue and Gayley Avenue              | (full)       |
| 8) Wilshire Boulevard and Veteran Avenue         | (partial)    |
| 9) Wilshire Boulevard and Gayley Avenue          | (partial)    |

- 10) Wilshire Boulevard and Westwood Boulevard (partial)
- 11) Lindbrook Drive and Westwood Boulevard (complement)

Note: complement - shuttle used in conjunction with physical measure to mitigate  
full - shuttle used to fully mitigate impact  
partial - shuttle and physical mitigations results in only partial mitigation

The Applicant proposes to implement a shuttle program in the Westwood area to serve retail customers within the Westwood Village/UCLA area including the project patrons. The shuttle program, as proposed, offers frequent service over 3 routes at a nominal fare with low emission buses, such as hybrid electric/CNG (Compressed Natural Gas) vehicles which seat approximately 20 passengers (see Attachment D).

While the density of trips in Westwood favor the trial of a shuttle system, the initial operating costs for the shuttle are not currently available from traditional funding sources. Transit funds are primarily derived from sales tax revenues which are below expectations under the current economic conditions. Consequently, DOT recommends that the applicant operate the shuttle with a suitable financial guarantee. A 5-year trial period is recommended; however, the vehicles purchased should have approximately a ten-year life. After the trial, the City may decide if it is better for the traditional operators to run the shuttle. On the other hand, if after 5-years the shuttle is not operating as projected, DOT recommends that the applicant be assessed the trip fee equivalent for the shortfall in removed trips.

Prior to the issuance of any City approvals including any building permit, DOT recommends that the applicant submit an initial shuttle operating plan and execute a Covenant to implement the shuttle program for five (5) years. Such covenant shall be accompanied by a Letter of Credit in the amount estimated to be \$2.8 million satisfactory to DOT to guarantee implementation of the Shuttle Program. The \$2.8 million represents an initial capital investment of \$2.0 million to purchase 10 vehicles and \$800,000 to guarantee the annual operating cost. The \$800,000 amount is equivalent to 380 pm peak hour trips times the currently proposed Westwood/WLA Traffic Impact Fee of \$2,110 per pm peak hour trip and is in excess of the estimated \$600,000 annual operating cost.

With the purchase of the required vehicles, the letter of credit would be reduced to the \$800,000 amount. The commitment for operating shall be reviewed and renewed annually for a total of 5 years. At the end of 5 years, the applicant will owe the difference of the actual average weekday peak hour ridership from the 380 vehicle trip reduction goal (equivalent to 760 pm peak hour riders on the 3 lines) times the adopted Westwood/WLA Traffic Impact Fee. These funds may be used by the City to implement alternative traffic mitigations as addressed in the Westwood/WLA Traffic Improvement Mitigation Program.

The initial Shuttle Program must be approved by DOT prior to the issuance of any temporary or permanent Certificate of Occupancy. It should also be noted that the shuttle vehicles should be of sufficient quality to satisfy a 10-year operating expectancy and that

both the vehicles and drivers must comply with the public transportation vehicle laws of the City of Los Angeles and the State of California.

With respect to parking, DOT has concluded that the applicant's proposal to provide approximately 2,500 parking spaces provides sufficient parking for the project considering the joint trip purposes of a mixed use facility as proposed. Assuming that the shuttle operation is reliable and convenient as specified by DOT, the most effective control over the success of the shuttle service is parking availability and pricing. DOT recommends that the applicant provide annual reports on the shuttle ridership and make recommendations for parking management policies which would enhance the shuttle ridership.

#### **C. Neighborhood Protection Plan**

Over and above the need to mitigate intersection impacts on the Westwood Village Streets, the applicant must provide adequate assurance against intrusion of commercial traffic through adjacent neighborhood streets.

Prior to the issuance of any Certificate of Occupancy for this project, the applicant shall develop a Neighborhood Protection Plan in consultation with DOT and the Fifth Council District Office. The plan may include, but shall not be limited to, additional traffic control devices including turn prohibitions, traffic diverters, speed humps or other measures to discourage commuter traffic from entering the residential neighborhood.

The applicant shall guarantee necessary funding of the Neighborhood Protection Plan through cash or Letter of Credit in the amount of \$300,000 before the issuance of any building permit. Upon the expiration of five years after the Project reaches 85% occupancy (as determined by Building and Safety), the property owner may request a refund from DOT for any unused portion of this fund. However, the refund shall only be granted if DOT and the Fifth District Council Office determine that all of the provisions of the Plan have been fully complied with and no additional future improvements are necessary.

#### **COVENANT AND AGREEMENT**

The applicant must sign and record a Covenant and Agreement acknowledging that DOT is formulating, and the City Council may adopt a Transportation Specific Plan for the Westwood Community, West Los Angeles District and Brentwood-Pacific Palisades District Plan areas to which this project may be subject and that the applicant covenants and agrees to implement the provisions as are described in the Transportation Specific Plan, including but not limited to, payment of any traffic mitigation fees to the extent that Council, after notice and hearing, adopts such an ordinance. The draft ordinance, which includes a proposed traffic mitigation fee of \$2,110 per trip, is expected to be adopted by the City Council by February 1997. The applicant will have to comply with the provisions of the new ordinance before the issuance of any building permits.

**DRIVEWAY ACCESS AND INTERNAL CIRCULATION**

The access to the retail portion of the proposed project is served by 2 main driveways - one on Weyburn Avenue west of Tiverton Avenue and the other on Glendon Avenue north of Kinross Avenue. Residential and employee/commercial delivery access to the retail project would be from three driveways along the one-way portion of Tiverton Avenue. Prior to issuance of any permit, the applicant shall guarantee through the Department of Public Works B-Permit process, the installation of a traffic signal at the northerly driveway on Weyburn Avenue. Installation of the traffic signal shall be required before the issuance of any certificate of occupancy.

This report and review does not include the review of the project internal circulation and parking plans. The applicant should be required to submit those plans to DOT for review and approval prior to the issuance of any building permit.

**Attachments**

cc: Council District 5  
Ira Smedra  
Crain & Associates  
Western District, LADOT  
Geometric Design, LADOT

adr a.wvilge2

# ATTACHMENT A

## VILLAGE CENTER WESTWOOD PM PEAK HOUR PROJECT TRIP GENERATION

Land Use	Size	Trip Rate		Gross Trips	Pass-by Adjust-ment	Internal Adjust-ment	Adjusted Trips
		PM		PM			PM
<b><u>Proposed</u></b>							
Retail	163,803 SF	5.71/1,000 SF		936	10%	35%	514
Supermarket	50,000 SF	8.80/1,000 SF		440	40%	20%	176
Restaurant	45,720 SF	3.10/1,000 SF		142	0%	10%	128
Theater	4,700 Seats	0.15/Seat		705	10%	35%	388
Senior Apartments	242 Units	0.08/Unit		19	---	---	19
				Total Trips			1225
<b><u>Existing</u></b>							
Retail	24,400 SF	5.71/1,000 SF		140		45%	77
Theater	652 Seats	0.15/Seat		98		45%	54
Apartments	42 Units	0.70/Unit		30		---	29
				Total Existing Trips			160
				Net New Trips			1065

## VILLAGE CENTER WESTWOOD

## SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVELS OF SERVICE

P.M. PEAK HOUR

	INTERSECTION	EXISTING (1995)	FUTURE (2000) W/O PROJECT	FUTURE (2000) WITH PROJECT	PROJECT IMPACT	AFTER MITIGATION	
1	Le Conte Ave and Gayley Ave	0.647 B	0.696 B	0.705 C	0.009	0.693	-0.003
2	Le Conte Ave and Westwood Bl	0.927 E	0.999 E	1.002 F	0.003	0.998	-0.001
3	Le Conte Ave and Hilgard Ave	0.501 A	0.556 A	0.615 B	0.059	0.598	0.042
4	Weyburn Ave and Gayley Ave	0.737 C	0.797 C	0.837 D	0.040 *	0.815	0.018
5	Weyburn Ave and Westwood Bl	0.626 B	0.735 C	0.907 E	0.172 *	0.679	-0.056
6	Weyburn Ave and Glendon Ave	0.327 A	0.391 A	N/A	N/A	0.255	-0.136
7	Weyburn Ave and Tiverton Ave	0.620 B	0.732 C	0.947 B	0.215 *	0.509	-0.223
8	Weyburn Ave and Hilgard Ave	0.482 A	0.540 A	0.736 C	0.196 *	0.490	-0.050
9	Kinross Ave and Gayley Ave	0.634 B	0.707 C	0.708 C	0.001	0.698	-0.009
10	Kinross Ave and Westwood Bl and Broxton Ave	0.634 B	0.714 C	0.840 D	0.126 *	0.627	-0.087
11	Kinross Ave and Glendon Ave	0.651 B	0.690 B	0.878 D	0.188 *	0.542	-0.148
12	Lindbrook Dr and Gayley Ave	0.439 A	0.483 A	0.495 A	0.012	0.484	0.001
13	Lindbrook Dr and Westwood Bl	0.630 B	0.711 C	0.814 D	0.103 *	0.726	0.015
14	Lindbrook Dr and Tiverton Ave and Glendon Ave	0.481 A	0.547 A	0.729 C	0.182 *	0.654	0.107
15	Lindbrook Dr and Hilgard Ave	0.411 A	0.459 A	0.533 A	0.074	0.563	0.104
16	Wilshire Bl and Sepulveda Bl	1.283 F	1.480 F	1.505 F	0.025 *	1.390	-0.090
17	Wilshire Bl and Veteran Ave	1.143 F	1.294 F	1.324 F	0.030 *	1.324	0.030 *
18	Wilshire Bl and Gayley Ave	1.126 F	1.271 F	1.325 F	0.054 *	1.311	0.040 *
19	Wilshire Bl and Westwood Bl	0.993 E	1.195 F	1.328 F	0.133 *	1.296	0.101 *
20	Wilshire Bl and Glendon Ave	0.701 C	0.811 D	0.802 D	-0.009	0.829	0.018
21	Wilshire Bl and Selby Ave	0.761 C	0.867 D	0.877 D	0.010	0.883	0.016
22	Wilshire Bl and Westholme Ave	0.763 C	0.866 D	0.876 D	0.010	0.883	0.017
23	Wilshire Bl and Warner Ave	0.600 B	0.690 B	0.701 C	0.011	0.711	0.021
24	Sunset Bl and Hilgard Ave	0.870 D	0.987 E	1.019 F	0.032 *	0.984	-0.003
25	Sepulveda Bl and Montana Ave	0.745 C	0.903 D	0.939 D	0.036 *	0.939	0.036 *
26	Veteran Ave and Gayley Ave and Montana Ave	0.901 E	0.983 E	1.015 F	0.032 *	1.015	0.032 *
27	Westwood Bl and Wellworth Ave.	0.714 C	0.928 D	0.847 D	0.019	0.847	-0.001

\* Significant Impact

VILLAGE CENTER WESTWOOD

ATTACHMENT C

SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVELS OF SERVICE  
GLENDALE AVENUE CLOSURE

Intersection	AM Peak Hour				PM Peak Hour			
	Existing (1995)	Future (2000) Without Glendon Ave Closure	Future (2000) With Glendon Ave Closure	Change in V/C	Existing (1995)	Future (2000) Without Glendon Ave Closure	Future (2000) With Glendon Ave Closure	Change in V/C
1. Weyburn Ave & Westwood Bl	0.499 A	0.594 A	0.660 B	0.066	0.626 B	0.715 C	0.862 D	0.127*
2. Weyburn Ave & Glendon Ave	0.111 A	0.159 A	N/A	N/A	0.327 A	0.391 A	N/A	N/A
3. Weyburn Ave & Tiverton Ave	0.332 A	0.430 A	0.452 A	0.022	0.620 B	0.732 C	0.820 D	0.088*
4. Weyburn Ave & Hilgard Ave	0.286 A	0.319 A	0.333 A	0.014	0.482 A	0.540 A	0.597 A	0.057
5. Kinross Ave & Westwood Bl & Broad Ave	0.456 A	0.525 A	0.596 A	0.071	0.634 B	0.714 C	0.821 D	0.107*
6. Kinross Ave & Glendon Ave	0.319 A	0.340 A	0.200 A	-0.14	0.651 B	0.690 B	0.365 A	-0.325
7. Lindbrook Ave & Westwood Bl	0.546 A	0.630 B	0.645 B	0.015	0.630 B	0.711 C	0.762 C	0.051*
8. Lindbrook Ave & Tiverton Ave & Glendon Ave	0.373 A	0.434 A	0.439 A	0.065	0.481 A	0.547 A	0.598 A	0.051
9. Lindbrook Ave & Hilgard Ave	0.411 A	0.474 A	0.489 A	0.015	0.617 B	0.695 B	0.764 C	0.069*
10. Wilshire Bl & Westwood Bl	0.938 E	1.093 F	1.127 F	0.034*	0.993 B	1.195 F	1.263 F	0.068*
11. Wilshire Bl & Glendon Ave	0.578 A	0.682 B	0.654 B	-0.028	0.701 C	0.811 D	0.755 C	-0.056

\* Significant Impact



## ATTACHMENT D

### Assumptions/Calculations for Shuttle Program

Shuttle route segments	3 routes
Headways each route	7 minutes
Travel time (round trip) per route	20 minutes
Shuttle trips per route	9 round trips per hour
Capacity per vehicle (10-year life)	20 seats
Peak period ridership (*)	14 passengers per bus
Peak passengers per route per direction (9 x 14)	126 passengers per direction
Peak passengers per route (round trip) 126 x 2	252 passengers per route
Total peak passenger (252 x 3)	756 passengers per hour
Vehicle trips eliminated per passenger (*)	0.5 vehicles eliminated per passenger
Total trips eliminated	378 vehicle trips

- \* Assumes that 2/3 or 14 of the 20 seats would be occupied and that only 1/2 of the riders would have otherwise driven a car. Three vehicles would be required therefore on each route to maintain a minimum 7 minute service. Each round trip will be approximately 4 miles per route.

### Cost Analysis

#### Capital

10 Vehicles (10 year life) at \$200,000 \$2,000,000

#### Annual Operating Costs

313 days per year (excludes Sundays)

\$40 per vehicle service hour

9 vehicles for 2 hours

\$225,360

5 vehicles for 6 hours

\$375,600

subtotal

\$600,960

#### Capitalization for 5 years

\$600,000 times 5 years

\$3,000,000