

Appendix 1
Draft EIR Comment Letters



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
INTERIM DIRECTOR

ACKNOWLEDGEMENT OF RECEIPT

DATE: August 22, 2002

TO: Maya Zaitzevsky
Los Angeles City Planning Department
200 N. Spring Street, Rm 763
Los Angeles, CA 90012

RE: 2000 Avenue of the Stars ENV-2001-4027-CU
SCH#: 2002011024

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ENVIRONMENTAL
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This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: August 1, 2002
Review End Date: September 16, 2002

We have distributed your document to the following agencies and departments:

- California Highway Patrol
- Caltrans, District 7
- Department of Fish and Game, Region 5
- Department of Parks and Recreation
- Department of Toxic Substances Control
- Department of Water Resources
- Integrated Waste Management Board
- Native American Heritage Commission
- Office of Emergency Services
- Office of Historic Preservation
- Regional Water Quality Control Board, Region 4
- Resources Agency
- State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.





Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
Interim Director

September 17, 2002

Maya Zaitzevsky
Los Angeles City Planning Department
200 N. Spring Street, Rm 763
Los Angeles, CA 90012

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SEP 19 2002

ENVIRONMENTAL
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Subject: 2000 Avenue of the Stars ENV-2001-4027-CU
SCH#: 2002011024

Dear Maya Zaitzevsky:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 16, 2002, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures

cc: Resources Agency

State Clearinghouse Data Base

SCH# 2002011024
Project Title 2000 Avenue of the Stars ENV-2001-4027-CU
Lead Agency Los Angeles City Planning Department

Type EIR Draft EIR
Description Demolition of 678,822 square feet of commercial space located within 2 eight story buildings, to be replaced with the construction of a 15 story building with 719,924 square feet of office, 30,527 square feet of restaurant, 18,318 square feet of retail, and 10,178 square feet of cultural space for a total of 778,947 net square feet of development.

Lead Agency Contact

Name Maya Zaitzevsky
Agency Los Angeles City Planning Department
Phone 213-978-1355 **Fax**
email
Address 200 N. Spring Street, Rm 763
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Olympic Blvd./Constellation Blvd.

Parcel No.	Range	Section	Base
Township			

Proximity to:

Highways 405, I-10
Airports
Railways
Waterways
Schools Beverly Hills High School
Land Use Office + retail/ C2-2-O/Regional Commercial

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; California Highway Patrol; Caltrans, District 7; Integrated Waste Management Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 08/01/2002 **Start of Review** 08/01/2002 **End of Review** 09/16/2002



DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

August 1, 2002

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ENVIRONMENTAL
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DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

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

Subject: Draft Environmental Impact Report, 2000 Avenue of the Stars
SCH #2002011024

5816 CORPORATE AVE.
SUITE 200
CYPRESS
CALIFORNIA
90630-4731

PHONE
916/816-6847

FAX
916/816-6853

INTERNET
consrv.ca.gov

GRAY DAVIS
GOVERNOR

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. We offer the following comments for your consideration.

The proposed project is located within the administrative boundaries of the Beverly Hills oil field. There are three plugged and abandoned wells within the project boundaries. These wells are identified on Division map 117 and records. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps. One of the wells, G & M Oil Co. "Wolfskill" 44, may be located under or in close proximity to the proposed new construction. This well was abandoned in 1940, but this office has no records of re-abandonment in 1970 as stated on page 143 of the DEIR.

Building over or in the proximity of plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

Maya E. Zaitzevsky, Project Coordinator

August 1, 2002

Page 2

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division's Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction.

Thank you for the opportunity to comment on the DEIR. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Curtis", with a long horizontal flourish extending to the right.

David Curtis
Environmental Engineer

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

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*Flex your power!
Be energy efficient!*

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

RE: IGR/CEQA # 020805NY
DEIR/2000 Avenue of the Stars
LA/405/30.86
SCH# 2002011024

August 30, 2002

Dear Ms. Zaitzevsky:


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

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of your need to discharge clean run-off water.

We would like to remind you that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 020805NY.

Sincerely,


STEPHEN J. BUSWELL
IGR/CEQA Branch Chief
Transportation Planning Office
Caltrans, District 7



Department of Toxic Substances Control



Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

*Clerk
9/16/02
e*

SEP 16 2002

September 13, 2002

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

NOTICE OF COMPLETION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2000 AVENUE OF THE STARS, SCH NO. 2002011024

Dear Ms. Zaitzevsky:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR states that the proposed Project site is within the historic boundaries of the Beverly Hills Oil Field (Wolfskill Oil Unit). The Limited Phase I Environmental Site Assessment Update for the Site by Law/Crandall also states that Camp, Dresser & McKee, Inc. is evaluating the potential hazards associated with oil fields, such as methane gas, hydrogen sulfide gas, and free petroleum products in soil and ground water. The EIR should include the result of the evaluation performed by Camp, Dresser & McKee, Inc., and the name of government agency providing regulatory oversight.
2. The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
3. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the EIR should

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Ms. Maya Zaitzevsky
September 13, 2002
Page 2

identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,



Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: ✓ Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806



Department of Toxic Substances Control



Edwin F. Lowry, Director
1001 I St. 25th Floor
P.O. Box 806

Sacramento, California 95812-0806

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

MEMORANDUM

AUG 08 2002

RECEIVED

TO: Sayareh Amirebrahimi, Branch Chief
Site Mitigation Program, Region 3

FROM: Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

DATE: August 5, 2002

SUBJECT: TRANSMITTAL AND REVIEW OF LEAD AGENCY ENVIRONMENTAL DOCUMENTS FOR
2060 Avenue of the Stars - 2002011024

The Department has received the project listed above. The project is being referred to you as a:

- Non-Essential/Information Item Only
- Sensitive Land Use Project
- Non-Sensitive Land Use Project

A Courtesy Copy of the Notice of Completion Transmittal Form Has Also Been Sent to:

- Permitting Branch (document not included)

The Department is encouraged to review this project and if applicable make comments pertaining to the project as it relates to hazardous waste and/or any activities which may fall within the Department's jurisdiction. Please have your staff: 1) conduct its review of the attached document prior to the end of the comment period; 2) complete the appropriate items below; and 3) return this transmittal sheet and a copy of any response letter from your office to:

Planning & Environmental Analysis Section (PEAS)
CEQA Tracking Center
1001 I St., 22nd Floor
P.O. Box 806
Sacramento, California 95812-0806
Fax (916) 323-3215

Date Comment Period Began: 08/01/2002

Comments Due to Lead Agcy:

Comments Due to OPR: 09/16/2002

Reviewed By: ALBERTO VALMIDIANO

Date: 9/12/02

COMMENTS have been prepared and a copy has been provided to PEAS via:

- Attached Copy
- FAX (916-323-3215)

NO COMMENTS NECESSARY because:

- All Department concerns have been adequately addressed; OR
- Project does not fall within the Department's areas of responsibility.

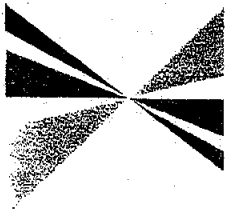
Thank you for your assistance with this project. If you have any questions, please contact Ken Tison, CEQA Tracking Center, at (916) 322-5266 or CALNET 492-5266.

The energy crisis facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.



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SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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San Bernardino County: Jon Mikels, San Bernardino County • Bill Alexander, Rancho Cucamonga • Lee Ann Garcia, Grand Terrace • Bob Hunter, Victorville • Susan Lien, San Bernardino • Gary Ovit, Ontario • Debra Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Huenerne

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

September 25, 2002

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ENVIRONMENTAL
UNIT

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

RE: Comments on the Draft Environmental Impact Report for the 2000 Avenue of the Stars Project, Century City – SCAG No. I 20020418

Dear Ms. Zaitzevsky:

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

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

SCAG staff has evaluated the Draft Environmental Impact Report for the 2000 Avenue of the Stars Project, Century City for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our January 28, 2002 letter on the Notice of Preparation (NOP) for this Draft EIR.

The Draft EIR, in Sections H (Land Use) and J (Population and Housing), cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. The Draft EIR incorporated a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the applicable policies with the proposed Project. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the August 1 - 15, 2002 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

Los Angeles Unified School District

ROY ROMER
Superintendent of Schools

ANGELO BELLOMO
Director, Office of
Environmental Health and Safety

Environmental Review File
Miscellaneous "AG"

September 18, 2002

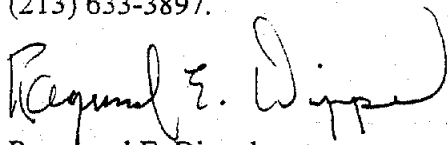
Los Angeles City Planning Department
Environmental Review Section
200 N. Spring Street, Room 763
Los Angeles, CA 90012

**SUBJECT: HAUL ROUTE FOR CONSTRUCTION OF A 15-STORY BUILDING
2000 AVENUE OF THE STARS - DEIR NO. 2001-4027**

Thank you for giving the Los Angeles Unified School District (LAUSD) an opportunity to comment on DEIR NO. 2001-4027. The proposed project's Haul Route through Overland Avenue passes **Overland Elementary School**. Consequently, the District's concern is student and school staff safety

The District's review of this proposed project includes the attached comments concerning daily negative impacts upon this LAUSD School, due to the project's hauling activity. Mitigation measures necessary to protect the school and its walk routes during construction are also included.

Thank you for your attention to this matter. If you need additional information please call me at (213) 633-3897.



Raymond E. Dippel
Assistant Environmental Planning Specialist

RD:rd
Attachments

c: Ms. Suzanne Lindele Di Julio
Mr. Merle Price

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ENVIRONMENTAL
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ENVIRONMENTAL IMPACT RESPONSE

The following are environmental impact concerns and mitigation measures necessary to address school traffic, pedestrian routes and transportation safety issues.

- LAUSD Transportation Branch, (323) 227-4400, must be contacted regarding the potential impact, if any, upon existing school bus routes.

School buses must have access to Overland Avenue Elementary School

During construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.

During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact school bus-on-time performance and bus passenger safety.

Because of provisions in the California Vehicle Code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop

The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic through the areas.

- Contractors must guarantee that safe and convenient pedestrian routes to Overland Avenue Elementary School are maintained. The "Pedestrian Routes to Overland Avenue Elementary School" map will be provided upon request.
- Contractors must maintain ongoing communication with the administrator of Overland Avenue Elementary School, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to school will be impacted.
- Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian and vehicular safety.
- Haul routes are not to be routed past Overland Avenue Elementary School, except when school is not in session.
- Funding for crossing guards to be provided when safety of children is compromised by construction-related activities at impacted crossings.

Los Angeles Unified School District

ROY ROMER
Superintendent of Schools

Environmental Review File
Miscellaneous "AG"

September 26, 2002

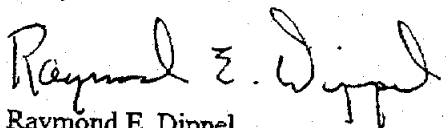
Los Angeles City Planning Department
Environmental Review Section
200 N. Spring Street, Room 763
Los Angeles, CA 90012

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Raymond E. Dippel
Assistant Environmental Planning Specialist

RD:rd
Attachments

c: Ms. Suzanne Lindele Di Julio
Mr. Merle Price

ANGELO BELLOMO
Director, Office of
Environmental Health and Safety

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ENVIRONMENTAL IMPACT RESPONSE

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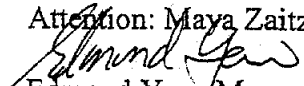
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CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: September 26, 2002

To: Mr. Con Howe, Director
Department of City Planning
City Hall, Suite 763
Attention: Maya Zaitzevsky

From: 
Edmond Yew, Manager
Land Development Group
Bureau of Engineering
201 N. Figueroa Street, Suite 200

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ENVIRONMENTAL
UNIT

Subject: **Comments on Draft Environmental Impact Report (DEIR) for
The "2000 Avenue of the Stars", Case No.: ENV- 2001-4027-EIR**

The staff of the Bureau of Engineering has reviewed your referral dated August 1, 2002, and has the following comments for inclusion into the Final Environmental Impact Report (FEIR):

STREET

Page 213 of the DEIR, under Streets and Highways, 4th paragraph stated " Olympic Boulevard is an east/west major highway..." Olympic Boulevard is designated as a Major Highway-Class I on the Highway Designation Map with a width of 126 feet for that portion of the street adjoining the project site. Therefore, a 13-foot wide strip of land should be dedicated on Olympic Boulevard adjoining the project site to complete a 63-foot half-street dedication. Olympic Boulevard adjoining the project site should be widened to a 51-foot width half- roadway, curb, gutter, and a 12-foot concrete sidewalk with street trees satisfactory to the City Engineer.

SANITARY SEWERS

Page 249 of the DEIR, under project impact, line 9 stated " there is sufficient capacity in the sewer system to accommodate the Project", based on comments from the Bureau of Sanitation. Subsequently the author concluded that no mitigation measures are warranted. Continuing on the same page under Cumulative Impact, line 3 and 4 indicated " Related projects must comply with the City's water conservation policies would be subject to review for adequate sewer capacity". Apparently, there is a contradiction in these statements as far as sewer capacity. Perhaps additional mitigation measures might be warranted to safeguard the adequacy of the sewer capacity of public sanitary sewers in the vicinity of the project site.

The capacity of a sanitary sewer depends on several factors. It seems that the DEIR has relied only on the water conservation factor and the subsequent conclusion stated on page 250 of the DEIR apparently is not based on all available elements such as type, size, slope, and existing availability of the public sewers. Therefore, a comprehensive analysis

of the wastewater flows for the entire proposed project site, including capacity of the existing and future sanitary sewers in a cumulative context and in conjunction with the new development being proposed, should be addressed in the FEIR. Also, a table showing the times and locations of the flow measurements for each sanitary sewer of the existing sewer system in the project area both upstream and downstream should be included in the FEIR.

The FEIR should discuss the possibility of construction of additional sanitary sewers and a full analysis of the environmental effects likely to be associated with such construction. In addition, all related city wastewater policies and guidelines should also be included in the FEIR.

Should you have any questions in regard to the aforementioned comments, please call Ray Saidi of the Land Development Group of the Bureau of Engineering at (213) 977-7097.

grs

From: "Ray Saidi" <Rsaidi@ENG.LACITY.ORG>
Date: Wed Oct 30, 2002 11:16:55 AM US/Pacific
To: "Maya Zaitzevsky" <Mzaitzev@Planning.Lacity.Org>
Cc: "Ara Kasparian" <Akaspari@ENG.LACITY.ORG>
Subject: DEIR for the "2000 Avenue of Stars", ENV-2001-4027-EIR

October 30, 2002

Maya,

The office of Land Development Group of the Bureau of Engineering has received additional information regarding the capacity of the sanitary sewers in the vicinity of the above-mentioned project. Therefore, please make the following changes in our comments dated September 26, 2002:

On first page, under Sanitary Sewers, delete the 2nd paragraph on its entirety starting with the words " the capacity of a sanitary sewer depends on.....".

On second page, continuing under Sanitary Sewers, delete the paragraph in its entirety starting with " The FEIR should discuss the possibility of.....".

All other comments remain intact.

should you have any questions regarding the aforementioned corrections, please call my office at (213) 977-7097.



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

RICHARD N. SLAWSON
Executive Secretary

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

1626 Beverly Boulevard
Los Angeles, CA 90026-5784
Phone (213) 483-4222
(714) 827-6791
Fax (213) 483-4419

August 28, 2002

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

RECEIVED
CITY OF LOS ANGELES

AUG 29 2002

ENVIRONMENTAL
UNIT

Re: EIR Case No: 2001-4027 EIR
Project: 200 Avenue of the Stars

Dear Ms. Zaitzevsky:

I write to you on behalf of the Los Angeles and Orange Counties Building and Construction Trades Council, representing more than 52 local unions and 130,000 union members.

I recently had the opportunity to review the Draft EIR for Trammell Crow's 200 Avenue of the Stars project, and am heartened to find that the report concludes that this revitalization project can be built with little or no impacts to the community.

The development and construction of this project will create more than 1,300 jobs for our union members. In an economy where unemployment continues to rise, these jobs are critically important.

The City itself stands to gain an estimated \$2.6 million in one time development-related revenues and about \$3.5 million per year in recurring annual revenues once the project is completed. These are desperately needed dollars for vital community services such as police and fire, in a City with serious budget concerns.

Thank you for the opportunity to comment on this worthy project.

Sincerely,

Richard Slawson
Executive Secretary

RS:le
opeiu#537/afl-cio



RICHARD N. SLAWSON
Executive Secretary

Los Angeles / Orange Counties Building and Construction Trades Council

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

1626 Beverly Boulevard
Los Angeles, CA 90026-5784
Phone (213) 483-4222
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August 29, 2002

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

RE: EIR Case No.: 2001-4027-EI
Project: 2000 Avenue of the Stars


Dear Ms. Zaitzevsky:

As Executive Secretary for the Los Angeles and Orange Counties Building & Construction Trades Council, I'd like to comment on the Draft EIR for the proposed 2000 Avenue of the Stars Project.

Regarding traffic, several widely accepted methodologies were used to compute trip generation for the proposed Project. Importantly, all methodologies were in sync with the final determination: trip generation for the proposed Project will decrease compared to the trips caused by the existing Project. Further, proposed mitigation measures such as the Transportation Demand Management Program will ensure that potential impacts, particularly at the intersection of Santa Monica Boulevard and Avenue of the Stars, will be effectively reduced to a less than significant level. Clearly, this replacement Project will reduce traffic from the level that the neighbors have become used to from the existing ABC entertainment Center.

The proposed development is key to maintaining the vital character of Century City and a strong local economy. On behalf of the Los Angeles/Orange Counties Building & Construction Trades Council, we ask that you move this important Project through the public hearing process in a timely manner.

Thank you,


Richard Slawson
Executive Secretary

cc: Councilmember Jack Weiss

RS:ah
opeiu#537/afl-cio

LAW OFFICES

CASE, KNOWLSON, JORDAN & WRIGHT LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2049 CENTURY PARK EAST, SUITE 3350

LOS ANGELES, CALIFORNIA 90067

TELEPHONE (310) 552-2766

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DANIEL A. CASE*
ARTHUR R. KNOWLSON, JR.*
MICHAEL F. WRIGHT
BARRY A. YOCH*
PATRICK WALSH
DANIEL G. JORDAN
J. PATRICK FLEMING, JR.
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*A PROFESSIONAL CORPORATION

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OF COUNSEL

EDWIN I. LASMAN*

DAVID M. LUBER

MICHAEL HICKOK

MARK H. EASTMAN

September 10, 2002

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

Re: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR
Reference Number: SCH # 2002011024

Dear Ms. Zaitzevsky:

I am writing this letter in support of 2000 Avenue of the Stars Project.

I am a lawyer who has had the good fortune of working in Century City for most of my career (beginning in 1976) and who has lived within two miles of Century City since 1981. While I am a big fan of Century City and believe it is one of the finest office communities in the country, the ABC Entertainment Center is the one area that does not live up to that standard. With this proposed project, however, it is my hope that this outdated center can be rescued and turned into a vibrant part of the Century City community.

The flaws in the existing center are numerous. The cold, drafty, dark retail areas are uncomfortable and uninviting. The tunnel area is completely devoid of any charm or comfort. The reflection off the stonework in the plaza area is unrelenting in its brightness. There is no open space which lends itself to a pedestrian-friendly ambience like so many of the wonderful redevelopments which have taken place in office communities over the last several years.

There seems to be a bias against any change in Century City (clearly expressed at a public scoping meeting which I attended earlier this year). I do not understand this. With all of the creativity in design and function being applied to this project, we should be very thankful, both as office tenants and nearby residents, that the owners of this project have the resources to redevelop this poorly designed and under-utilized facility. It strikes me as absurd that some

Maya Zaitzevsky, Project Coordinator
Department of City Planning
September 10, 2002
Page 2

people are resisting this effort. In truth, we should all be embracing this project as a wonderful urban redevelopment which will only add to the luster of Century City.

Thank you for taking the time to read this letter.

Very truly yours,

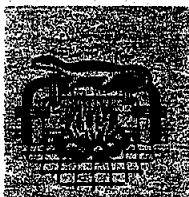


Daniel A. Case, P.C.
of CASE, KNOWLSON, JORDAN & WRIGHT LLP

DAC/kk

cc: Councilmember Jack Weiss

International Association of Heat and Frost Insulators & Asbestos Workers



Local No. 5 City Azusa State California
Address 670 E. Foothill Blvd. Unit #2 Zip 91702-2628

September 9, 2002

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

RE: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR
Reference Number: SCH # 2002011024

Dear Ms. Zitzevsky:

Please accept this letter on behalf of Local Union #5 of the Heat and Frost Insulators. We would like to respectfully submit our whole-hearted support for the above noted project.

The Draft EIR for this project concludes that replacement of the outdated and under-utilized ABC Entertainment Center produced many positive affects, for example, bringing new tax revenues to fund badly needed City services such as police and fire support and will bring new jobs to the community. Additionally, the project can be done with little or no environmental impact on adjacent neighborhoods or without any new traffic impacts after mitigation.

Please join the families of Local #5 in support this worthwhile project. Thank you for your time and attention in this matter.

Sincerely,

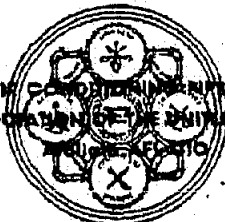
Jim Watkins
Business Manager
Asbestos Workers Local 5

cc: Councilmember Jack Weiss

Local Union 250

JOHN G. FERRUCCIO
President
EDWARD E. BARNES
Business Manager
TOMMY SPARKS, SR.
Fin. Secy-Treas.
CARMINE BUONAURO
Chief Bus. Agent-Rel. Div.

STEAM-REFRIGERATION-AIR CONDITIONING PIPE FITTERS AND APPRENTICES
OF THE UNITED ASSOCIATION OF THE UNITED STATES AND CANADA



Business Representatives
PAUL EVANS
ART GUZMAN
ROBERT W. JOHNSTON
TERRY MARTIN
ROGER ROUNDY
JOSEPH F. SCAVO
MIKE SCAVO
GEORGE VASQUEZ, JR.

18355 SOUTH FIGUEROA STREET, GARDENA, CALIF. 90248-4217
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S.F. Appren. (310) 323-4475 / Rel. Fax (310) 329-1348
Steam Fax (310) 329-2466

September 11, 2002

Ms. Maya Zaitzevsky, Project Coordinator
Department of City Planning
200 North Spring St., Rm763
Los Angeles, CA 90012

via facsimile 213/978-1343

Re: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR
Reference Number: SCH#2002011024

Dear Ms. Zaitzevsky:

On behalf of the 4,800 men and women of Steam-Refrigeration-Air Conditioning-Pipe Fitters and Apprentices of the United Association of the United States and Canada Local Union 250, I'm writing to express our support fro the 2000 Avenue of the Stars project.

The findings in the Draft EIR contain good news. The replacement project will not adversely affect traffic, congestion or the environment. In fact, the project will enhance Century City's urban environment and add amenities and open space for workers and neighbors to enjoy.

And there is more good news. The revitalization of the property will bring new revenues into the City and boost the local economy.

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,

Edward E. Barnes
Business Manager

EB/aa
opeiu 537/afi-cio

cc: Councilmember Jack Weiss



Westwood Gardens Civic Association
PO Box 64194
Los Angeles, CA 90064

September 16, 2002

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

Re: Comments on 2000 Avenue of the Stars, DEIR

Dear Ms. Zaitzevsky:

I am co-president of the Westwood Gardens Civic Association (a homeowners & residents association), which comprises approximately 615 homes. Our boundaries are National Blvd., Midvale Avenue, Pico Blvd., and Overland Avenue (including the Dunleer Place cul-se-sac). I have several comments, most regarding the traffic analysis. The adjacent West of Westwood Homeowner's Association, comprised of 1000 homes, is joining us in these comments. The 2000 Avenue of the Stars project would directly affect our area due to the use of the I -10 offramp at Overland, and Overland Avenue as a traffic route. The DEIR seems to essentially ignore our area and provides very little analysis of potential impacts.

General & Miscellaneous Comments:

1. I do not see the need for the project documented anywhere. While I realize that market conditions can change, is there a shortage of Class A space in Century City? Are the Century Plaza towers at full occupancy?
2. What does "[buildings] no longer meet current standards of operation" (pg. 2 of the Executive Summary) mean? The adverse impacts of the project and extensive use of resources cannot be condoned without solid reasons.
3. The proposed removal of 113 trees and resultant loss of our urban forest cannot be adequately replaced as proposed. These trees represent years of growth and a great asset to the Century City area. The project should relocate the trees to other properties or parks as well as planting new trees as densely as possible (at a greater than 1:1 ratio for trees lost). The project should include a commitment to maintain the health of all trees for at least five years.
4. There is an error on page 164, under policy 2-2.2: What transit corridor is on Sawtelle Blvd. and in what way is that walking distance from Century City?

5. The list of schools on Page 203 is inaccurate. There are schools in Beverly Hills that are substantially closer than Webster MS. Overland Avenue ES is located on Overland Avenue at Ashby directly affected by construction and operational traffic. There are also several private and religious schools that are not mentioned.

6. The DEIR discussion of pedestrians is inconsistent. Pg. 30 of the Executive Summary states (in reference to Police) that the project would NOT generate additional pedestrians. Pg 62, however, discusses pedestrian access and uses pedestrian access to reduce trips (6th bullet).

Construction Comments

7. Construction would be very disruptive for at least two years. The proposed construction route (82 trucks per day, between the hours of 7 am and 6 pm) along Overland and Pico would substantially impact at least the following sensitive receptors:

- a. Palms Park Child Care
- b. Palms-Rancho Park Library
- c. Notre Dame Elementary School
- d. Notre Dame Academy High School
- e. Overland Avenue Elementary School
- f. St. Timothy's School
- g. Temple Isaiah School
- h. Lycee Francaise
- i. Residences along Overland Avenue
- j. Child care facilities in residences

Many of these facilities have children's play yards that would be adversely affected by noise and dust from the trucks. Also classrooms and outdoor teaching areas would be adversely affected.

8. I suggest a better construction route would be use of the 405 freeway to Santa Monica Blvd. Although the street may be under construction, there is greater distance to sensitive uses (a wider street) and fewer schools.

9. Where are the truck staging areas "outside of Century City" (page 109)? We do not want noisy diesel trucks idling in front of our homes or schools. Overland Avenue is often used in this way and is too congested for this to be a safe or sound solution. The trucks need to stage on the construction site. The project also needs to coordinate with the Santa Monica Blvd. project regarding staging and construction impacts. Cumulatively, these could be significant and adverse.

10. The traffic, noise, and dust impacts will be significant even if the impact due to the project is "temporary". Two years or more of classroom disruption is 20% or more of these kids' lives! And breathing dust, possibly including asbestos, for any period is hazardous. Adequate mitigation needs to be provided if the project goes forward, including traffic and staging areas away from sensitive receptors.
11. Perhaps the project could build noise walls to protect the school play yards and our young people.
12. Does the analysis take into account trips diverted due to construction on Santa Monica Blvd. (either planned or just by driver's choice) to routes approaching from the south (Overland, Pico, etc.)?
13. Please notify us at least two weeks in advance of the date for the hearing for the construction route. Every resident and business along all the proposed routes should also be notified.

Traffic Analysis comments and related subjects

14. The DEIR did not do any noise or traffic impact analysis for the stretch of Overland Avenue between Pico Blvd. and the I-10. Traffic and noise levels are already very high and ANY increase would have a significant adverse impact. The analysis logic that impact would only occur if the existing noise levels are low is flawed. There is an absolute criteria of 65dBA for sensitive uses and evidence in the literature* that people are more sensitive to increases in noise if background levels are already high. And since key stretches of roadway were not measured for background levels or analyzed, it is hard to swallow the conclusions. New analysis is required.

**"Traffic noise impacts occur based upon the definition contained in 23 CFR 772. This definition does not contain subjective descriptors. If impacts are identified, noise abatement measures must be considered and implemented if found to be reasonable and feasible. When analyzing the reasonableness of abatement, SHAs should consider the relationship between the absolute noise levels and the extent of the increase over existing noise levels for a given situation. A small increase at a higher absolute level (e.g., 70 dBA to 75 dBA) can be more important and justify greater consideration than a similar increase at a lower absolute level (e.g., 50 dBA to 55 dBA). Likewise, a large increase at a lower absolute level (e.g., 40 dBA to 55 dBA) can be less important and justify less consideration than a similar increase at a higher absolute level (e.g., 55 dBA to 70 dBA)."*

Source: HIGHWAY TRAFFIC NOISE ANALYSIS AND ABATEMENT POLICY AND GUIDANCE by U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch, Washington, D.C. June 1995

15. The analysis of traffic and trips, that leads to the often stated conclusion that traffic will be less, is seriously flawed. As such, the noise and air quality analysis are also flawed since they depend on the trip analysis. New analysis is needed.

- There will be 500 new jobs from the new office trips and these, and the office trips generated, will be coming from outside Century City during morning and afternoon rush hours, Monday through Friday.
- The trips that are being replaced are generally cinema and theatre generated. These do NOT occur in the same time frame as the office trips. Any discussion that uses total trips is flawed if the impacts or conditions in the peak hours worsen. This change in type of trip is noted in the discussion of pedestrians on pg. 30 of the Executive Summary; and taken into account in some cases by using the peak hour traffic numbers rather than total trips, but is not fully addressed in the discussion of impacts.
- The community would like to reduce the trips originating from outside Century City.

16. The stated reduction of trips by 6,711 (which I don't believe given the above points) is not real in any case since these "replacement trips" can be reassigned to another parcel. There is nothing to guarantee that these trips would not be used by another parcel or parcels for development projects that would not require the same level of public scrutiny and therefore would return to the traffic flow and nothing would be improved (although this project bases its conclusions on the reduction of those trips.)

17. The discussion of internal trips and the assumptions made needs proof. Was a survey taken? Are we expected to believe that currently 282 trips (1/2 of the trips) are made in the AM peak hour to the high turnover restaurants (Jamba Juice, Vista Coffee, Bread Winner, Java City, etc) that ARE NOT trips going to the office building? In other words that 282 people will drive to the plaza, pay \$3 per 10 minutes to park to go to Jamba Juice or where ever, (when they could go to one on Pico Blvd. for free?) and then drive somewhere else? That is over 4 trips per minute! Even more ridiculous in the PM peak - 454 Inbound trips (1/2 of total) of people driving to the plaza from somewhere else, paying to park, getting a coffee or whatever, then driving someplace else? I suspect that the number of internal trips may be more like 90+%. The number of current trips is important because it is those, when removed, that lead to the conclusion of a reduction in traffic.

18. If you look at the number of trips by type and likely time of day, I think a more accurate picture would emerge. Office trips (generally in the AM and PM peaks) go up by 6,051. (An increase of 402 in the AM peak inbound and 305 in the PM peak outbound) Cinema, theatre, and quality restaurant trips (generally on the weekends and evenings) go down. These categories are what attract traffic from outside Century City. The high turnover restaurant, small retail (printers, store, nails), and health club trips (which are largely, if not entirely, internal trips) go down. New analysis is needed.

19. The increase in office trips is stated as 6,051. But the increase at the peaks is stated as 402 in the AM peak inbound and 305 in the PM peak outbound. These numbers seem low for the peak hours - barely 10 % of the total. I find this very unlikely for office trips and would like supporting documentation.

20. The traffic analysis shows existing numbers fairly equal for inbound and outbound trips in the PM peak. Do the numbers from the garage and valet services bear this out?

21. The levels of service for local intersections should be recalculated with a more reasonable number for trips...the increase in office trips!!! Not the decrease in total.

22. Similarly for the Air Quality and Noise analyses. "Because the project results in fewer vehicle trips...lower traffic volumes at all intersections." (pg. 14 Air Quality Appendix.) is a unsupportable statement. Your own numbers show an increase in AM peak numbers of 101 (even allowing the internal trip numbers to stand as is). How will there be less impact with 400 more peak trips? New analysis is needed.

23. Please provide a better map or definition of where traffic is coming from. I can't make the arrows add up or see what surface streets are used from the I-10...For example, the Pico and Overland shows 11% - not the 17% as stated coming from the I-10 plus some part of the surface street percentage.

24. Traffic is already very congested most of the day and the analysis shows the intersection of Pico and Overland to be at LOS D or F (existing) and E or F (future). There was not even an analysis of the Overland/ I-10 intersection. There have been many accidents as well as "near misses" at the Overland/Ashby intersection by the elementary school. Even one more trip would be an adverse significant impact in this area.

25. Are you encouraging roadway congestion by providing parking? Bike lanes will do more to reduce auto trips than notice boards of car-pool opportunities. How many electric vehicle spaces are you providing?

How about promoting other alternative forms of transportation? How effective is the current ridesharing, vanpool matching, etc. Does it reach 5% of the 943 peak hour am trips? (47). Is there proof?

26. Once new analysis is provided, a new DEIR is needed, as well as revised mitigation measures. If the project goes forward, I favor the Reduced Density Alternative which is also the Environmentally Sensitive alternative. This is the responsible course for the city to take. I would also like bike lanes or segregated paths from the community into Century City (along Pico, Olympic, Santa Monica, etc.) added to the mitigation measures of the project (and paid for by the developer).

I look forward to your responses to these comments, a revised analysis, and notices of all future public input opportunities on this project.

Sincerely,



Annette Mercer
Co-President
Westwood Gardens Civic Association

cc: Council Member Jack Weiss, (CD 5)
Terri Tippet, West of Westwood

JUDITH & BARTON WOLIN
2160 CENTURY PARK EAST #1111
LOS ANGELES, CA 90067
(310)284-8483

September 12, 2002

RECEIVED
CITY OF LOS ANGELES

SEP 17 2002

ENVIRONMENTAL
UNIT

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

Re: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR
Reference Number: SCH#2002011024

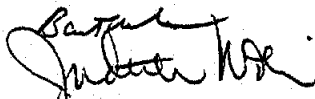
Dear Ms. Zaitzevsky:

As Century City residents who live adjacent to the proposed 2000 Avenue of the Stars project, we are looking forward to the new energy and excitement that this project promises to bring back to the area. The developer has in effect planned a major public park within a highly urban area. There are to be new eateries and retailers and space for a separate cultural facility as well.

We were uneasy about the impact on existing traffic the new project would cause. The Draft EIR concluded there would be no new traffic impact after mitigation. Also of concern were those of construction impacts. The Draft EIR confirmed construction and demolition activities would result in short-term noise impacts; however, mitigation measures will restrict the hours and days of construction so that our evening hours and sleep times will not be adversely affected.

The Draft EIR concludes that there would be little or no environmental impact on our neighborhood with the replacement of the outdated and under-utilized existing facilities. We support and applaud Trammell Crowe's efforts to revitalize the site and look forward to enjoying its amenities before too long.

Sincerely,



Barton Wolin
Judith Wolin

Matthew and Esther Rubin

1415 Peg Place #307
Los Angeles, CA 90035
September 19, 2002

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

SUBJECT: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR

Dear Ms. Zaitzevsky,

Although we were never personally concerned about increased traffic, we were happy to note that the Draft Environmental Impact Report finds that traffic trips will actually be less with the replacement project than what exists currently.

The report also concludes that the design of the proposed project will enhance the character of Century City, a fact with which we both agree.

We wholly support the 2000 Avenue of the Stars project, believing that the ABC Entertainment Center is old and outdated. We also look forward to a new cultural facility and hope that all forms of the cultural arts will be investigated for the site, including live theater.

Sincerely,

*Esther Rubin
Matthew Rubin*

West Of Westwood
Homeowners Association

September 17, 2002

Maya Zaitzevsky
Los Angeles Planning City Department
Environmental Review Section
200 N. Spring Room 763
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

SEP 19 2002

ENVIRONMENTAL
UNIT

Re: Comments on 2000 Ave. of the Stars, DEIR

Dear Ms. Zaitzevsky:

I am writing on behalf of the Board of Directors of the West of Westwood Homeowner Association, representing approximately 1000 homes in Rancho Park. Our boundaries are in two sections. Pico (north) National (south), Kelton (east), Sepulveda (west) and Overland (west), Patricia (east), Pico (north), and Ashby (south). We border both sides of Westwood Garden Civic Association.

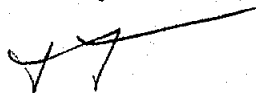
We have reviewed the comments they are submitting to you.

We agreed with the issues they have raised and the negative impact they will have on this community.

We want the file to reflect that we share the same concerns they do regarding the above proposed project.

Thank you for your time and consideration in this matter.

Sincerely,



Terri Tippit, President

Cc Councilman Jack Weiss
Annette Mercèr

MARTA FEIGENBAUM
2160 Century Park East
Los Angeles, CA 90067
(310) 210-9610

RECEIVED
CITY OF LOS ANGELES
SEP 23 2002
ENVIRONMENTAL
UNIT

September 18, 2002

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

EIR No: ENV-2001-4027-EIR
2000 Avenue of the Stars

Dear Ms. Zaitzevsky:

As a near neighbor of the proposed 2000 Avenue of the Stars project, I am very interested in the Draft Environmental Impact Report.

The traffic issue has been thoroughly studied in this EIR according to several different methodologies. Under all methodologies, the EIR shows that traffic trips generated by the proposed project will not increase over the project it replaces, but that they will actually decrease.

This new project will help to revitalize Century City. The landscaped plaza and cultural facility will be exciting additions to our Century City environment.

Thank you.

Sincerely,



Marta Feigenbaum

JOHN JANULAW
2013 Parnell Avenue
Los Angeles, CA 90025

RECEIVED
CITY OF LOS ANGELES
SEP 24 2002
ENVIRONMENTAL
UNIT

September 19, 2002

Maya E. Zaitzevsky
Project Coordinator
Los Angeles City Planning Department
200 North Spring Street, Rm. 763
Los Angeles, CA 90012

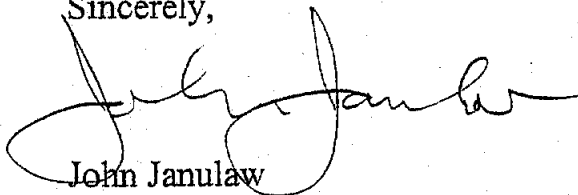
2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR

Dear Ms. Zaitzevsky:

The Draft Environmental Report clearly demonstrates that with mitigations, the 2000 Avenue of the Stars project can be built with no significant negative impacts to the community. Rather, the community will benefit with less trip generation, additional City revenue and a new Class A, office complex with a landscaped park/plaza.

I hope the City will move this project through the approvals process without delay.

Sincerely,



John Janulaw

JOHN GERARD, ARCHITECT
2302 PELHAM AVENUE
LOS ANGELES, CA 90064
(310) 475-4016

RECEIVED
CITY OF LOS ANGELES

SEP 23 2002

ENVIRONMENTAL
UNIT

September 22, 2002

RE: 2000 Avenue Of The Stars
EIR Case # ENV-2001-4027-EIR
Reference # SCH # 2002011024

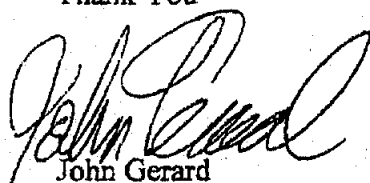
Dear Ms Zaitzevsky,

I have lived in Rancho Park at three different locations since 1974. During that time my practice has renovated thirty houses within walking distance of my home office. I plan to stay in this location and continue this work.

The continuing improvement and functional growth of Century City is very important to me and my neighbors. I am particularly please with the architectural form of this project. It is not one of the current "Deconstructive" trainwecks we see going up all over Los Angeles. It expresses an elegant simplicity.

"Improvement" is the keyword. I feel that all aspects of this project are expressed by it.

Thank You


John Gerard

MARTIN BALCHER
2753 GLENDON AVENUE
LOS ANGELES, CALIFORNIA
90064

RECEIVED
CITY OF LOS ANGELES
SEP 30 2002
ENVIRONMENTAL
UNIT

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

September 23, 2002

Re: 2000 Avenue of the Stars
EIR Case No. ENV-2001-4027-EIR
Reference Number: SCH # 2002011024

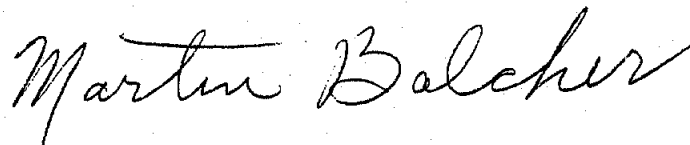
Dear Ms. Zaitzevsky,

I am writing to express my support for the above referenced project. My concerns about the consequences of this project to nearby residents have been fully addressed by the Draft Environmental Impact Report. As a result, I am confident that the Project will ultimately benefit our City and enhance our property values with no negative impact to the quality of our neighborhoods.

I am reassured of the positive benefit of this redevelopment effort by the Draft EIR's findings that traffic may be reduced as a result of having fewer retail establishments among the new tenants. Also, the Project's Neighborhood Traffic Protection Program offers additional reassurance to residents in this regard.

I fully support the 2000 Avenue of the Stars Project and look forward to its completion and the enhanced value it brings to our community.

Sincerely,



Martin Balcher

cc: Councilman Jack Weiss

**1925 SOUTH BEVERLY GLEN BOULEVARD, #28
LOS ANGELES, CALIFORNIA 90025**

September 23, 2002

**RECEIVED
CITY OF LOS ANGELES
SEP 27 2002
ENVIRONMENTAL
UNIT**

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

**Reference: 2000 Avenue of the Stars
Case Number: ENV-2001-4027 EIR**

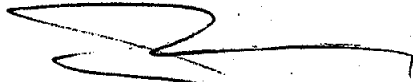
Dear Ms. Zaitzevsky:

I am writing to express my support of the above referenced matter. This redevelopment project, as proposed by The Trammell Crow Company and as scrutinized in the Draft Environmental Impact Report, suggests a very positive outcome for Century City and its residents.

A refurbished mid-rise office building that incorporates technologically superior design and improved function and utility will be a welcome replacement for the current deteriorating structure.

I support the 2000 Avenue of the Stars project.

Sincerely,



Wilbur Cohn, Esq.

cc: Councilman Jack Weiss

Fred Fein
2122 Century Park Lane, #215
Los Angeles, CA 90067

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

September 23, 2002

Re: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR

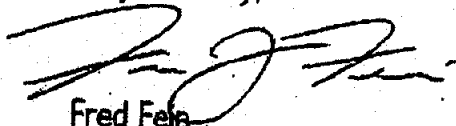
Dear Ms. Zaitzevsky:

As the owner of two condominiums in the area directly adjacent to the above referenced location, I would like to express my opinion of the proposed 2000 Avenue of the Stars redevelopment project.

This project has my full support. After reviewing the Executive Summary of the Draft Environmental Impact Report, I am convinced that this redevelopment effort will result in increased property values as well as the opportunity to provide better space utilization for the facility. The proposed energy efficient building, as corroborated by the DEIR, will not only reduce the general utility burden to the City but provide more inviting and useful public space as well.

As its name implies, Century City will demonstrate forward thinking value with the approval and completion of this project.

Very sincerely,



Fred Fein

cc: Jack Weiss, City Council Member

California Country Club Homes Association

September 24, 2002

RECEIVED
CITY OF LOS ANGELES
SEP 26 2002

Los Angeles City Planning Department
Environmental Review Unit
200 N. Spring Street, Room 763
Los Angeles, California 90012
Attn: Maya Zaitzevsky, Project Coordinator

CITY PLANNING
DIVISION OF LAND

Re: Case No. ENV - 2001-4027-CU
2000 Avenue of the Stars, TRAMMEL CROW/ABC Entertainment Center

CALIFORNIA COUNTRY CLUB HOMES ASSOCIATION ("CCCHA") (a Corporation) is located in Cheviot Hills directly south of the proposed Century City Trammel Crow development project identified above. Our community of approximately 2000 residents will be the most directly and adversely affected by the proposed Trammel Crow development due to the proximity of our neighborhood to such a massive project and the undeniably significant impact of the increase of traffic and contamination of our environment.

Our long established residential community is adjacent to the I-10 freeway (Santa Monica Freeway) on and off ramps at National Boulevard, in addition to the major convergence of National Boulevard, Manning Avenue, Motor Avenue, Palms Boulevard, Exposition Boulevard and Hughes Avenue to the South. We are also directly impacted by Castle Heights Boulevard and Robertson Boulevard to the East, Overland Avenue and Santa Monica Freeway to the West, and Pico Boulevard, Motor Avenue and Avenue of the Stars to the North.

In view of the recent major high rise developments in Century City and their resulting increase in car trips daily on a twenty-four hour seven day basis, an additional escalation of car trips generated by the Trammel Crow project would overwhelm our residential community and permanently deteriorate our quality of living, property values and environment.

The inevitable contamination of our environment, the pollution of breathable air, the significant noise decibel level effect upon our elderly, children and health impaired, is a critical safety hazard. The DEIR does not adequately identify the significance of the direct and indirect health impacts of the Project for either the short or the long term. The DEIR does not anticipate the physical changes and the environmental specifics of any health and safety problems or alterations to the ecological systems.

The DEIR does not address the probable result in population distribution, concentration and relocation from the current time to an inevitable future increase in land usage due to the proposed project, including all aspects of the resource base, not limited to water supply, sewer disposal, infrastructure, public services, etc.

The DEIR does not analyze how the Trammel Crow project would not undermine and defeat the purpose of the original Century City Specific Plan, which was to safeguard and assure that all land development in Century City would be strategically designed and balanced, with self containment and mitigation of adverse environmental, traffic and parking impacts to protect the adjacent communities.

The DEIR does not identify or focus on the critical problems that will be triggered by the expansion of and construction on Santa Monica Boulevard during the same time frame as the proposed Trammel Crow project. Undoubtedly, traffic will be diverted away from Santa Monica Boulevard southward through our community for a period of years. What mitigations are being proposed to prevent the intolerable burden of these traffic impacts on our neighborhoods?

The DEIR has failed to evaluate the relevance of other projects in the surrounding area or assessed the cumulative impact on traffic from projects such as expansion of the Westside Pavillion, Culver City, and the Westwood and UCLA development plans, etc. The DEIR does not reflect that a reasonable effort has been made to discover, disclose and discuss related past, present and future projects, even if under review by other agencies.

CEQA has mandated that avoidable significant environmental damage be substantially decreased or avoided where feasible. The DEIR does not indicate serious concern with the collateral damage to the health, welfare and safety of the community, which this project would generate.

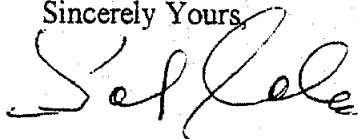
CCCHA hereby requests that we receive notice regarding all hearings scheduled for the Trammel Crow development project including hearings by the Los Angeles Planning Commission, and the Deputy Advisory Agency. We also request specific information regarding the amount of funds to be allocated by Trammell Crow for mitigations, and where, how, and when such allocations will take place.

Please be advised that we have retained the professional services of Ryan Snyder Associates on behalf of CCCHA and hereby enclose the Transportation Study and Analysis of the DEIR, which we incorporate by reference herein.

CCCHA hereby incorporates in our response all of the "deficiencies" in the DEIR identified in the submissions by any and all other parties, including other home owners' associations, etc. CCCHA also wishes to incorporate by reference all the submissions by all other parties in support of our position.

Only by comprehensive analysis of the project may "decision makers" balance the development's benefit against its environmental cost, consider mitigation measures, assess the advantages and compare other alternatives. An accurate, comprehensive and specific project description is essential for a credible DEIR. We look forward to your response to these issues.

Sincerely Yours,

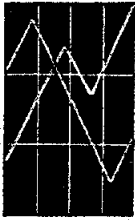
A handwritten signature in cursive script, appearing to read "Val Cole".

Val Cole

Chairman of the Board

CALIFORNIA COUNTRY CLUB HOMES ASSOCIATION

Please reply to:
3246 Barbydell Drive
Los Angeles, CA 90064



RYAN SNYDER ASSOCIATES
TRANSPORTATION PLANNING AND POLICY ANALYSIS

431 SOUTH BURNSIDE AVENUE #100
LOS ANGELES, CALIFORNIA 90036-5349
TEL: (323) 571-2910 FAX: (323) 571-2909

11

September 19, 2002

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

RECEIVED
CITY OF LOS ANGELES

SEP 20 2002

CITY PLANNING
DIVISION OF LAND

RE: Comments to the 2000 Avenue of the Stars Development Project DEIR

Dear Ms. Zaitzevsky:

On behalf of the California Country Club Homeowners Association I have reviewed the Draft Environmental Impact Report (DEIR) for the 2000 Avenue of the Stars Development Project and have prepared the following remarks. My comments solely relate to traffic impacts of the Project. They are divided into two sections. The first concerns the methodology used to calculate trip generation. The second addresses the traffic mitigation plan.

Trip Generation Methodology

Highly accurate methods of estimating the number of trips that new development Projects will generate don't exist. Many uncertainties ranging from tenant mix to local transportation improvements complicate such estimation. The Project at hand used the best method that is commonly used locally, and the method required by the Los Angeles Department of Transportation. However, potential inaccuracies are especially pertinent to this Project, since a large portion of the trips generated by the existing building are particularly difficult to assess with commonly used methods. The result yields a significant decrease in the Projected number of trips by the new Project, with a large margin of error. This margin of error presents justification for local residents to call for a strong trip mitigation program.

Projections show a daily reduction in travel ranging from 35% to 65%, and a PM-peak-hour reduction ranging from 43% to 58% with the new Project, depending on which of three methodologies is used. A quick look at the Project raises the question of how a building that is 100,000 square feet larger would generate so much less traffic. The answer lies with the change in land use. The mix of the present building has much less office space and much more retail, restaurant and entertainment than the proposed Project. Using trip generation models, over half of the trips assigned to the existing development are with restaurant uses. Since the new Project has much less restaurant space, the models show many fewer trips both daily and in the peak.

Trips to restaurants are much less predictable than those to office uses. Employees from nearby offices often visit the present restaurants in Century City at lunchtime. These people don't generate trips. In fact, the restaurants reduce some travel because they make it possible to walk to lunch. The Revised Los Angeles Department of Transportation trip generation model takes this into account with an "Internal Trip Adjustment" of 50%. The 50% reduction is applied equally to retail and restaurants. It is also a standard reduction used in other sites. With lack of better data this may be a fair adjustment, but the margin of error with this number is large. To provide a more accurate estimate of trips generated by the existing development, thereby allowing a better assessment of trip gain or trip loss from the new Project, the particulars of this site must be taken into account. How many of those visiting the restaurants walk vis-à-vis those who drive? Moreover, the 50% trip reduction is applied equally during the day and in the PM peak hour. What portion of those visiting the restaurants are the lunchtime office people, versus those who drive to these Century City restaurants during the peak hour? How many dinner patrons come from an adjacent office? How many of them arrive later than the PM peak? These questions can only be answered with more detailed analysis of this particular location.

A more predictable outcome is that the larger office space will generate peak-period travel. It is possible, but less predictable, that having less restaurant space will cause more Century City employees to drive to eat. In general, mixed land use allows for more opportunities for people to carry out daily functions without driving, than in places with a less balanced mix. The new Project is less balanced than the existing building, and combined with other offices adjacent to the site, creates a less favorable land-use mix.

The point of this is not to imply that the Project will generate more traffic than the DEIR states. Rather, it is to note the large margin of error (in either direction) of the trip generation models used. This provides justification for the neighboring residential community to request ambitious traffic mitigation.

Analysis of the Trip Mitigation Program

Overall, the components of the trip mitigation program presented in the DEIR are reasonably comprehensive. The Transportation Demand Management (TDM) program has a good balance of carpooling, vanpooling, bicycling, walking and alternative work-hour elements. The program provides both physical site improvements and on-going management. The details need to be filled in and enhanced. The following suggestions would provide more assurance that the program will be effective:

1. Raise the TDM Goal

The TDM goal is a reduction of only 5% of peak-hour trips. This is very modest and is much lower than that achieved at other sites. The goal should be raised to 15%.

Setting a low goal in the beginning could lead to a casual approach later on. Ongoing effort will be necessary to sustain a good TDM program.

2. Full-Time Employee Transportation Coordinator

The TDM program calls for an On-Site Employee Transportation Coordinator (ETC). This is good and will be necessary for an effective program. The ETC must maintain a high-level of activity to be successful. This site will likely host approximately 3,000 employees. In order to effectively manage the TDM program the ETC will have to work full time. The TDM program submitted doesn't specify how much time the ETC will commit to the program. The TDM plan should be amended to read "Full-Time On-Site Employee Transportation Coordinator."

3. Implement Parking Cash-Out Law

California's Parking Cash-Out law (Health and Safety Code 43845) requires employers to offer employees who would otherwise receive free parking, the option to instead receive the cash equivalent of the parking that they can apply to ridesharing, transit, bicycling or walking. This law only applies to employers who are tenants in buildings where the cost of parking is separated from the lease of the office, and where the tenant has flexibility to change the number of parking spaces they lease. Research shows that the option to cash out parking has been highly successful in reducing the number of people who drive to work alone. This Project should separate the cost of parking from the lease, and allow flexibility in the number of parking spaces that tenants lease. This Project should also clearly inform tenants and employees about the parking cash-out law.

4. Signs and Notices to the ETC

Employees working at the new Project will need to be aware of the TDM program and how to contact the ETC. Signs should be posted in the lobby to alert people to the program and instruct them on how to contact the ETC.

5. Increase the Number of Permanently Marked Preferential Parking Spaces

The present plan calls for two preferential parking spaces to be permanently marked. Employees will need to know that they can get a preferred space if they carpool to work and will need to know that such parking spaces exist. Permanently marking at least 2% of the required parking spaces will be more effective.

6. Ensure TDM Program Monitoring

In order to guarantee that the TDM program is carried out year-after-year, a reliable monitoring system needs to be set up. Historically, monitoring of developer TDM programs has fallen through the cracks in Los Angeles. Two measures are suggested to ensure effective monitoring. First, a filing fee sufficient to cover several hours of staff review time should accompany annual monitoring reports. Second, neighboring residential groups and the local Neighborhood Council should receive notices annually as to when the monitoring reports are sent in, along with instructions to obtain a copy.

7. Ensure an Effective Neighborhood Protection Program

The Project developers have voluntarily agreed to provide funding to assist surrounding residential neighborhoods in implementing a Neighborhood Traffic Protection Program (NTPP). The Los Angeles Department of Transportation will develop and implement the NTPP. In order to provide some assurance of an effective program, a portion of the funding should go to the residential neighborhoods to develop plans of their own.

The California Country Club Homeowners Association represents one of the residential areas that the project would potentially impact. The neighborhood is bounded primarily by:

- Queensbury Drive
- Forrester Drive
- Club Drive
- Manning Avenue

These streets are of particular importance when considering the impact of traffic on the neighborhood.

Some of the key streets within the neighborhood are:

- Barbydell Drive
- Dannyhill Drive
- Danalda Drive
- Woodbine Street
- Earlmar Drive
- Cavendish Drive
- Cheviot Drive

These streets could potentially be impacted by cut-through traffic on the way to the Interstate 10 Freeway and its access ramps.

The California Country Club neighborhood is residential. Many people walk in the neighborhood and would like to be able to continue to do so safely and comfortably. Additional traffic would increase the likelihood of cut-through traffic on these residential streets, as well as increased pollution. Especially vulnerable are the senior citizens, children and pets. The residents of the neighborhood would like to maintain its quiet, clean, safe and comfortable ambiance.

A well-conceived Neighborhood Traffic Protection Program will ensure that the neighborhood will maintain its character. Such a program might include such features as:

- Traffic diverters

- Speed humps
- Curb extensions
- Signage
- Turn restrictions, or
- Other traffic calming devices.

8. Optional - Allow Reduction in New Parking Spaces

If effective, the TDM program will reduce the demand for parking in the new Project. The City of Los Angeles should consider allowing, and the Project developer should consider constructing fewer parking spaces than is presently planned for. Once built, the building owner will have incentive to fill the parking spaces in order to generate revenue. This incentive runs counter to the need to reduce travel to the site. Having fewer parking spaces to fill will encourage the building owner to maintain an active TDM program.

If implemented, these measures will provide some assurance of an effective traffic mitigation program.

Pedestrian-Friendly Design

Pedestrian-friendly design of buildings encourages walking. It also encourages transit use because transit trips usually start and end on foot. The design of the 2000 Avenue of the Stars Development Project falls well short of what planners look for in designing for pedestrian access. First, it only has a few pedestrian entrances from the street. Second, the entrances are designed to be far from the sidewalk. Third, there's nothing of interest for a pedestrian walking by to enjoy. From the pedestrian point of view the building will stand as a long blank wall, more like a barrier than a destination. A more pedestrian-friendly design would locate storefronts on the ground floor facing Avenue of the Stars, Constellation Boulevard and the access road inside of Olympic Boulevard. The storefronts would offer numerous entrances and would be located on the sidewalk. Although this is presently out of character with the existing Century City, it is critical that the second generation of growth in Century City begins with pedestrians in mind. This will encourage people to walk to the site and to use transit, thereby reducing traffic impacts.

Sincerely,



Ryan Snyder
President
Ryan Snyder Associates LLC

Manning Area Protection Association

An association of homeowners on Manning Avenue and Surrounding Streets
Address for Correspondence: 2618 Manning Avenue, Los Angeles, CA 90064
Phone Contacts: K.P. March 310-839-5410 and William Coleman 310-559-3728

25 September 2002

Maya E. Zaitzevsky
Los Angeles Planning Department
Environmental Review Section
200 North Spring Street, Room 763
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES
SEP 27 2002
ENVIRONMENTAL
UNIT

Site Location: 2000 Avenue of the Stars (Conversion to office space of what is currently Shubert Theater and adjacent movie theater), Century City, Council District 5

Re.: **Opposition of the MANNING AREA PROTECTION ASSOCIATION** to this project being approved; and Demand of the **MANNING AREA PROTECTION ASSOCIATION** for a Neighborhood Protection Plan to mitigate adverse traffic impact of this project on Manning Avenue south of Pico and surrounding streets, if this project is approved in any form

Dear Ms. Zaitzevsky:

The **MANNING AREA PROTECTION ASSOCIATION** is an association of homeowners who own houses on Manning Avenue south of Pico Boulevard, and on the streets near Manning Avenue. Our area is already severely adversely impacted by commuter cut-through traffic that comes off the 10 freeway and uses Manning Avenue (a residential street) and the additional residential streets that are near Manning Avenue to "cut-through" between the 10 Freeway and Century City. The **MANNING AREA PROTECTION ASSOCIATION** writes to tell you that The **MANNING AREA PROTECTION ASSOCIATION** opposes the project proposed for 2000 Avenue of the Stars, Century City, Council District 5 in any form.

That project as proposed will TRIPLE the amount of traffic cutting through Manning Avenue and other residential streets near Manning Avenue in both the morning and evening commuting hours. There is already a steady stream of out of the neighborhood commuter traffic cutting through Manning Avenue and other residential streets near Manning Avenue both during the morning and the evening commuter hours. Our residential streets simply cannot handle any more commuter cut-through traffic.

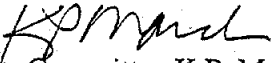
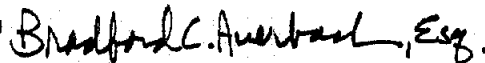
This project should not be approved at all, due to the significant deleterious effects approval of this project would have on traffic congestion, transportation, the environment, including but not limited to air quality, aesthetics, noise, and public services on the surrounding residential neighborhoods, including the area served by the **MANNING AREA PROTECTION ASSOCIATION**.

But if it is approved, despite the opposition of our Association, and despite the opposition of other homeowners associations, the project/developer and City of Los Angeles should be required to provide a strict Neighborhood Protection Plan, as a condition in any Development Agreement that is approved, requiring that enhanced traffic mitigation be provided by the developer/project and City of Los Angeles to prevent additional cut-through commuter traffic from using Manning Avenue South of Pico Boulevard and North of Motor Avenue, and other residential streets near that portion of Manning Avenue to "cut-through" our residential neighborhoods to and from the 10 Freeway and Century City.

Please confirm receipt of this letter in writing, and please advise in writing as to what will be done to reject this proposed project and to protect our neighborhood. Thank you.

Sincerely,

MANNING AREA PROTECTION ASSOCIATION

 *WILLIAM T. COLEMAN* 
Steering Committee K.P. March, William T. Coleman, Bradford C. Auerbach

Brad Auerbach
2624 Manning Avenue
Los Angeles CA 90064-3205
vox 310.838.4939
fax 310.838.4940
BRAD57VETT@AOL.COM

RECEIVED
CITY OF LOS ANGELES

SEP 27 2002

ENVIRONMENTAL
UNIT

25 September 2002

Maya E. Zaitzevsky
Los Angeles Planning Department
Environmental Review Section
200 North Spring Street, Room 763
Los Angeles, CA 90012

Site Location: 2000 Avenue of the Stars, Century City, Council District 5

Dear Ms. Zaitzevsky:

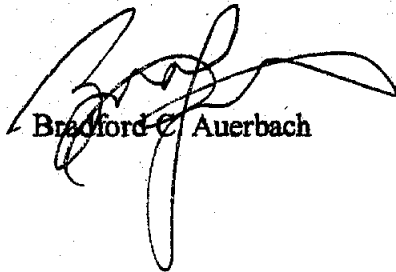
I have reviewed the Draft Environmental Impact Report (DEIR) in connection with the above-captioned proposed site. There exist significant deleterious effects on the environment, including but not limited to air quality, aesthetics, noise, public services and transportation/traffic.

As such, I demand a neighborhood protection plan to mitigate the commuter cut-through traffic that will invariably spill through the neighborhood in which I live.

As you may know, the Manning Avenue Protection Association is very concerned about this issue.

Please advise on your next steps.

Very truly yours,



Bradford C. Auerbach

September 25, 2002

RECEIVED
CITY OF LOS ANGELES

SEP 30 2002

ENVIRONMENTAL
UNIT

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

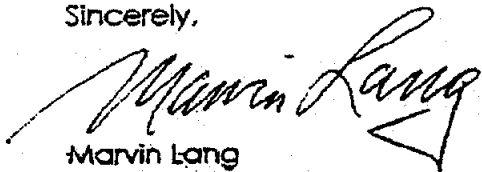
Re: 2000 Avenue of the Stars
EIR Case No: ENV-2001-4027-EIR
Reference No: SCH # 2002011024

Dear Mrs. Zaitzevsky:

I support the 2000 Avenue of the Stars Project and am pleased by the results of the studies in the Draft Environmental Impact Report.

I believe that the scope of this project has the potential to improve property values in the surrounding area while preserving the architectural integrity of Century City. Concerns about potentially negative consequences, whether environmental or functional, have been addressed and dismissed, by the DEIR. In addition, the anticipated revenues that will accrue as a result represent another significant ben

Sincerely,



Marvin Lang
9718 Cresta Drive
Los Angeles, California 90035

cc: Jack Weiss,
Councilman

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Frances Harper
John Harper

HELD PROPERTIES
Robert D. Held

HERBALIFE INTERNATIONAL OF AMERICA, INC.
Robert Bartling
Jim Escote

HITACHI, LTD.
Lori Sankach

CENTURY PLAZA TOWER TRANSMISSION COMPANY
James R. Durley
Chairman of the Board

CENTURY CITY CHAMBER OF COMMERCE
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Executive Vice President

CENTURY CITY SHOPPING CENTER
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Joel Siegal, Esq.

JMB REALTY CORP/AP PROPERTIES
Suzanne C. Nathan

JONES LANG LASALLE, INC / FOX PLAZA
Glen Barryhill

KATTEN MICHAN & ZANE
Kathryn Gerner

KAUFMAN, BERNSTEIN, OBERMAN, TIVOLI & MILLER
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KENZER CORPORATION
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LIFETIME TELEVISION
Marlene Herzig

MELION 1ST BUSINESS BANK
Ken Bezancaourt

MERCANTILE NATIONAL BANK
Muna Isha

MERRELL LYNCH
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NORTHROP GRUMMAN CORPORATION
Harris Sperling

OCHOA CONSTRUCTION
Catherine Shelton

ONESOURCE
G.A. "Chip" Jullin III

PACIFIC BELL
Susan Harris

PARK HYATT LOS ANGELES
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THE ST. REGIS, LOS ANGELES
Araha Azzabam

STARBUCK CHILDREN'S FOUNDATION
John Moschini, Jr.

SUNAMERICA, INC.
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TERRA PACIFIC REAL ESTATE SERVICES INC.
Scott Calozarera

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Jonathan Bruckner

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Brad Gienger

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Bambi Heiser
Maryann Kelly
Mary Willis

UNION BANK OF CALIFORNIA
Donald Heaca

UNIVERSAL PROTECTION SERVICE
Scott Jones

VALENSI, ROSE & MACARAIG
Arlan R. Gunner, Esq.

WEST L.A.P.D.
Cape Richard Wemmer

WETBURN CAPITAL MANAGEMENT, LLC
Craig O. Bulley



September 26, 2002

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

Via Fax: (213) 978-1343

Re: 2000 Avenue of the Stars
EIR Case No: BNV-2001-4027-EIR
Reference No: SCH # 2002011024

Dear Ms. Zaitzevsky:

On behalf of the Board of Directors of the Century City Chamber of Commerce, who on February 6, 2002 voted to take a position in support of 2000 Avenue of the Stars, I would like to express the Chamber's satisfaction with the Draft Environmental Impact Report.

The Chamber's mission is to promote, support, and advocate the interests of the business community. The redevelopment of the outdated, Class B-C office complex is necessary in order to revitalize an aging Century City property. The proposed Class A building will help meet the demand for modern, premiere office space, for which Century City is well known, and thus be instrumental in attracting and retaining upscale business activity. The Chamber heartily agrees with the Draft EIR's assertion that the "architectural design of the Project is consistent with the existing aesthetic image and character of Century City..." (Draft EIR, pg. 8, Volume 1).

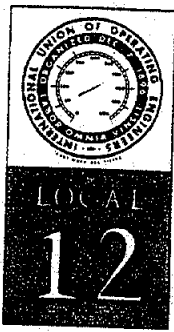
Because 2000 Avenue of the Stars is a replacement project that will include a different mix of uses, we are pleased to see that the various traffic studies support our original understanding that, after mitigation, the project will result in a less than significant traffic impacts. Further, the developer's voluntary offer to provide funding for the implementation of a Neighborhood Traffic Protection Program will assist residential neighborhoods in minimizing current non-residential traffic intrusion.

Revitalization is important to both our local business and residential communities, as it serves to keep our Century City economy vibrant. The economic benefits from the development and construction of this project, along with the future operational impacts, will significantly benefit not only Century City, but the City of Los Angeles as well.

Sincerely,

James D. Lynch
President & CEO

cc: Los Angeles City Councilmember Jack Weiss, via fax: (213) 978-2250



INTERNATIONAL UNION OF
OPERATING ENGINEERS

WM. C. WAGGONER
Business Manager
and
General Vice-President

September 26, 2002

RECEIVED
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SEP 27 2002

ENVIRONMENTAL
UNIT

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

Re: 2000 Avenue of the Stars
EIR Case Number: ENV-2001-4027-EIR
Reference Number: SCH #2002011024

Dear Ms. Zaitzevsky:

On behalf of the International Union of Operating Engineers, Local Union No. 12 for the jurisdiction of Southern California. I'm writing to express our support of the 2000 Avenue of the Stars project in Century City.

We have reviewed the Draft EIR and are very pleased with the positive findings contained in the report. The new project is going to update the outdated facilities that now exist on the site and bring new energy efficient buildings on line. The use of state-of-the-art technology will result in a significant decrease of electrical resources, which will contribute greatly to energy conservation.

This replacement project will revitalize the area, generate jobs and bring vitally needed tax revenues to the City.

Thank you for your consideration.

Sincerely,

Robert W. Burns
President
I.U.O.E., Local Union No. 12

RWB:kar

cc: Councilmember Jack Weiss
Fax (213) 978-2250