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January 26, 2015

Los Angeles City Council  
City Hall  
200 North Spring Street, Room 360  
Los Angeles, CA 90071  
Attn: Holly L. Wolcott, City Clerk

Re: Century City Center Project, January 27 Council Meeting Agenda Item Nos. 2, 8 (Council File Nos. 14-1130; 14-1130-S1); Case Nos. 2013-210-SPP-SPR-MS-C, CPC-2009-817-DA-M1; ENV-2004-6269-SUP1

Dear President Wesson and Honorable Councilmembers:

We write on behalf of the Applicant to respond to another last-minute submittal by opponents of the Century City Center Project ("Project"), and to confirm that the opponents' arguments have no merit, are already fully addressed in the City's record, and do not require further consideration by the Council.

Specifically, you received letters on January 22, 2015 from Robert H. Sutton of Bob Sutton Associates ("Sutton Letter") and on January 26, 2015 from Allyn D. Rifkin of Rifkin Transportation Planning Group ("Rifkin Letter"). **Neither letter discloses that both Mr. Sutton and Mr. Rifkin are paid consultants to opponents of the Project,** and that they have previously submitted virtually identical comments to the City regarding the City's environmental analysis of the Project. However, both the Sutton Letter and the Rifkin Letter offer **nothing new;** in fact, **all of the comments contained in both of these letters have been addressed numerous times by the City and the Applicant in the record,** including in the Project's Subsequent EIR.

The Rifkin Letter echoes all of the comments Mr. Rifkin has previously submitted on behalf of the Project's opponents, and pertain to the Applicant's request for an alternative Trip generation factor pursuant to Section 6 of the Century City North Specific Plan ("CCNSP") and the empirical trip generation study conducted by Gibson Transportation, Inc. that was approved by the Los Angeles Department of Transportation in support of that alternative factor. All of Mr. Rifkin's comments have been fully responded to by the City numerous times, including in the Responses to Comments in the Final Subsequent EIR (in particular Topical Responses 1 and 5 and Response to Comment O-16-6) and in oral testimony before the Hearing Officer and the Planning Commission. In addition, we have submitted numerous letters to the City that have

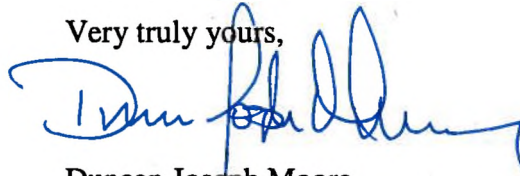
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explained exactly why Mr. Rifkin's statements are wrong, including in our letter to the Hearing Officer dated December 6, 2013. The Rifkin Letter attempts to cast doubt on the statistical validity of the Project's empirical trip generation study, but it misstates data provided in the Subsequent EIR and mischaracterizes standard practice in trip generation studies. As has been explained many times, in particular in Topical Response 5 of the Final Subsequent EIR, the data supporting the empirical trip generation study is statistically valid and robust.

The Sutton Letter also criticizes the Applicant's request for an alternative Trip generation factor under CCNSP Section 6, and provides Mr. Sutton's own views about the history of the CCNSP. Those views, however, have been contradicted numerous times in the record, including in a letter from former City Councilmember Zev Yaroslavsky, who was involved in the CCNSP's adoption. As the City has explained in detail in the Subsequent EIR, in particular Topical Response 1 in the Final Subsequent EIR, as well as in oral testimony before the Hearing Officer and the Planning Commission, Mr. Sutton's interpretation of the CCNSP is incorrect, and the Applicant's request for an alternative Trip generation factor is fully consistent with the CCNSP. The City's position is also supported by numerous submittals from the Applicant, including our letter to the Hearing Officer dated December 6, 2013.

Accordingly, **the claims in both the Sutton Letter and Rifkin Letter recycle previously submitted inaccurate claims that have been fully addressed by the City numerous times and do not require further consideration.** The Project has been recommended for approval by every City authority that has considered it – **including unanimous approvals and recommendations from the City Planning Commission and your PLUM Committee** – and the claims raised by Mr. Rifkin and Mr. Sutton have been uniformly rejected. Based on this submission, and the voluminous substantial evidence supporting the Project's approval in the record, we respectfully request that you deny the appeals, certify the EIR, approve the Project, and adopt the Development Agreement Ordinance.

Very truly yours,



Duncan Joseph Moore  
of LATHAM & WATKINS LLP

cc: Patrick Meara and Sarah Shaw, Century City Realty  
George Muhlsten, Latham & Watkins