

Benjamin M. Reznik
Direct: (310) 201-3572
Fax: (310) 712-8572
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

December 15, 2014

VIA E-MAIL (sharon.gin@lacity.org)

Hon. Jose Huizar, Chair
Hon. Gilbert Cedillo
Hon. Mitchell Englander
City of Los Angeles, Planning and Land Use Management Committee
200 N. Spring Street, Rm. 395
Los Angeles, CA 90012
Attn: Sharon Gin, Legislative Assistant

Re: Council File 14-1130
CPC-2013-210-SPP-SPR-MSA-A1
ENV-2004-6269-EIR-SUP1
1950 Avenue of the Stars
Additional Studies Provided by the Developer and City

Our Client: 1875/1925 Century Park East Company and WP Twin Towers, Inc.

Dear Chair Huizar and Honorable Members of the Planning and Land Use
Management Committee:

We represent t 1875/1925 Century Park East Company and WP Twin Towers, Inc. ("Watt Plaza") owners of Watt Plaza, which is located at 1875 and 1925 Century Park East in Century City, immediately adjacent to the Project Site. We write on their behalf to strenuously object to the *last-minute document dump* performed by the Developer, JMB Realty. This document dump, which includes substantive technical studies intended for adoption by the City as part of the Subsequent EIR for the Project, was uploaded to the City's Council File Management System this morning, *barely 24 hours prior to the Project's hearing* before the Planning and Land Use Management Committee ("PLUM"). This subterfuge—by design—deprives the public and decisionmakers of any meaningful opportunity to review and comment upon new environmental analysis, subverting the CEQA process and further cementing the impression of a project that has been railroaded through the review and hearing process.

Misleadingly characterized as "Errata," only a small portion of the materials appear to include minor edits and additions. Rather, the majority of the materials are new, substantive technical analyses, including:

- Traffic (alley analysis),

- Air quality modeling (Caleemod)
- Climate change/greenhouse gas analysis
- Noise monitoring;
- Trip length analysis; and
- Technical appendices/memoranda associated with the above.

The provision of this technical material mere hours in advance of the December 16, 2014 PLUM hearing for the Project effectively precludes any meaningful review and comment, and we reserve the right to submit additional comments to the City as we complete our analysis.

The primary purpose of an EIR is "to demonstrate to an apprehensive public that the agency has, in fact analyzed and considered the ecological implications of its action [in approving a project]." *No Oil, Inc. v. City of Los Angeles*, 13 C3d 68, 86 (1974). Here, by contrast and in contravention of CEQA's principles of public review and comment, the City and Developer have attempted to carry the Project forward in a manner that prevents adequate and informed review and comment. In a process already characterized by procedural errors, the City and Developer have merely cemented that characterization with this latest action.

Therefore, we request that, at a minimum, PLUM continue the hearing until its next regular meeting to permit adequate time to review and comment on the additional technical materials.

Very truly yours,



BENJAMIN M. REZNIK
NEILL E. BROWER of
Jeffer Mangels Butler & Mitchell LLP

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cc: Hon. Paul Koretz, Councilmember, CD5
Shawn Bayliss, Director of Planning and Land Use, CD5
Michael LoGrande, Director of Planning
Lisa Weber, Deputy Director of Planning
Charlie Rausch, Associate Zoning Administrator
Nic Hendrix, City Planner
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Our Client: Beverlywood Homes Association

Dear Chair Huizar and Honorable Members of the Planning and Land Use
Management Committee:

We represent the Beverlywood Homes Association, a community of 1350 homes and approximately 4000 residents immediately southeast of Century City. We write on their behalf to strenuously object to the *last-minute document dump* performed by the Developer, JMB Realty. This document dump, which includes substantive technical studies intended for adoption by the City as part of the Subsequent EIR for the Project, was uploaded to the City's Council File Management System this morning, *barely 24 hours prior to the Project's hearing* before the Planning and Land Use Management Committee ("PLUM"). This subterfuge—by design—deprives the public and decisionmakers of any meaningful opportunity to review and comment upon new environmental analysis, subverting the CEQA process and further cementing the impression of a project that has been railroaded through the review and hearing process.

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Our Client: 1875/1925 Century Park East Company and WP Twin Towers, Inc.

Dear Chair Huizar and Honorable Members of the Planning and Land Use
Management Committee:

We represent 1875/1925 Century Park East Company and WP Twin Towers, Inc. ("Watt Plaza") owners of Watt Plaza, which is located at 1875 and 1925 Century Park East in Century City, immediately adjacent to the Project Site. We write on their behalf to strenuously object to the *last-minute document dump* performed by the Developer, JMB Realty. This document dump, which includes substantive technical studies intended for adoption by the City as part of the Subsequent EIR for the Project, was uploaded to the City's Council File Management System this morning, *barely 24 hours prior to the Project's hearing* before the Planning and Land Use Management Committee ("PLUM"). This subterfuge—by design—deprives the public and decisionmakers of any meaningful opportunity to review and comment upon new environmental analysis, subverting the CEQA process and further cementing the impression of a project that has been railroad through the review and hearing process.

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Our Client: One Hundred Towers, LLC and Entertainment Center, LLC

Dear Chair Huizar and Honorable Members of the Planning and Land Use
Management Committee:

We represent One Hundred Towers, LLC and Entertainment Center, LLC, owners of the Century Plaza Towers and 2000 Avenue of the Stars, and we write on their behalf to strenuously object to the *last-minute document dump* performed by the Developer, JMB Realty. This document dump, which includes substantive technical studies intended for adoption by the City as part of the Subsequent EIR for the Project, was uploaded to the City's Council File Management System this morning, *barely 24 hours prior to the Project's hearing* before the Planning and Land Use Management Committee ("PLUM"). This subterfuge—by design—deprives the public and decisionmakers of any meaningful opportunity to review and comment upon new environmental analysis, subverting the CEQA process and further cementing the impression of a project that has been railroad through the review and hearing process.

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