

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

January 27, 2015

VIA E-MAIL (brian.walters@lacity.org)

Hon. Herb Wesson, President
And Honorable Members of the City Council
200 N. Spring Street, Room 395
Los Angeles, CA 90012
Attn: Brian Walters

Re: Council File 14-1130
CPC-2013-210-SPP-SPR-MS-C-A1
ENV-2004-6269-EIR-SUP1
1950 Avenue of the Stars
Objections to Last-Minute Raw Data Dump

Hearing Date: January 27, 2015

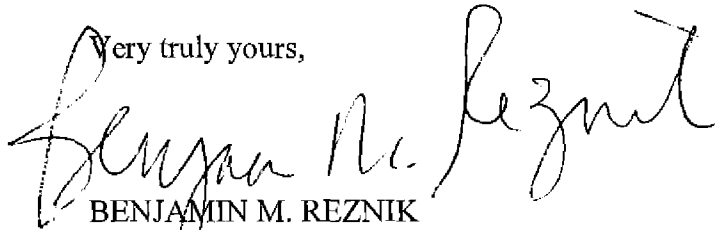
Dear President Wesson and Honorable Members of the City Council:

We strenuously object to the provision, *on the very morning of the hearing*, of over 400 pages of the raw technical data after repeated requests by us and our consultant Environ. Dated January 12, 2015, these data were only made publically available and posted to the Council File this morning, barely two hours prior to the final hearing on the Project. There is no practical way that any member of the public—or any decisionmaker—could possibly review any significant portion of that data, let alone attempt to replicate the purported results of that data. Thus, the Applicant has deprived the public and decisionmakers of any meaningful ability to evaluate the accuracy of the air quality and greenhouse gas analysis, which is particularly problematic given the numerous departures from accepted professional practice in modelling methods and assumptions, all of which appeared to accrue to the benefit of the Project by reducing the emissions that typical modelling parameters (including adjustments for LEED-type design features) suggest.

Los Angeles City Council
January 27, 2015
Page 2

This only confirms the need for a continuance of the Council hearing, at a bare minimum, to permit even the most cursory technical evaluation of the more than 400 pages of raw model output.

Very truly yours,



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

BMR:neb

cc: Hon. Paul Koretz, Councilmember, CD5
Shawn Bayliss, Director of Planning and Land Use, CD5
Michael LoGrande, Director of Planning
Lisa Webber, Deputy Director of Planning
Charlie Rausch, Associate Zoning Administrator
Nick Hendricks, City Planner
Dan Scott, Principal Planner
Michael Bostrom, Deputy City Attorney
Jay Kim, Los Angeles Department of Transportation