

Cheviot Hills Home Owners' Association
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July 30, 2009

Jimmy C. Liao
City Planner, EIR Unit
Environmental Review Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, Ca 90012

Email: Jimmy.Liao@lacity.org

RE: ENV-2008-4950-EIR/Century Plaza Development/2025 Avenue of the Stars, Los Angeles,
California/Council District 5/Scoping Comments

Dear Mr. Liao:

This letter is written on behalf of the Cheviot Hills Home Owners' Association and sets out comments and conditions to be considered and studied in the preparation of the Draft Environmental Impact Report ("DEIR") for the Century Plaza Development (the "Project").

The process of impartial analysis that is explicit in the Environmental Review process for this Project, i.e., the demolition of the landmark Century Plaza Hotel and its replacement with a new structure, or series of structures in the form of a combined office park, residential neighborhood, retail mall and hotel, among other uses, might lead one to assume with reasonable expectations of fairness that the political powers that be in the City of Los Angeles and the City administration's bureaucratic support personnel at the Department of Planning would be dispassionate analysts of the impact and worth of the Project to the City and to the Westside of Los Angeles in particular. But, according to The New York Times on July 22, 2009, page B8, the Department of Planning, which is supposed to work for the citizens of this City, has already decided that this new Project is just the thing to improve Century City and have already determined that this demolition and replacement process is a good idea. This is called pre-determination and is generally thought to be a very bad thing in governmental process. I quote from the article in question:

"In an interview, Mr. [Michael] Rosenfeld [the developer of the Century Plaza Development] who can see the hotel from his office in Century City, said that when he bought the building (with backing from the D.E. Shaw Group, a hedge fund) he had no plans to demolish it. *The idea he said, came from the Los Angeles City Planning Department, which is working to make Century City more pedestrian friendly.*"

Friendly indeed to developers, the construction industry and opportunities to increase the tax base. The New York Times article goes on to explain the problems of pedestrians being unable to walk through walls and across driveways in Century City. The only solution to Century City's lack of pedestrian-friendliness, it seems, is to destroy the Century Plaza Hotel. One would think that putting a few well-placed doors into the Hotel, a few reasonable walkways, maybe some reconfiguration of the front plaza opening toward Avenue of the Stars, might help things a bit and also mollify some bureaucratic ambitions and concerns. But instead City smarties think that ripping the whole Hotel out and putting in north of 1,561,670 square feet of newly constructed space (without regard to 2168 parking spaces) is the only apparent solution. Don't forget the promised gardens, which presumably replace (maybe replicate?) the gardens that already exist to the west of the existing Hotel.

"Smart growth"? That's a phrase that may well be used for this Project by its supporters, meaning allegedly smart use of space and density. And probably the Project will be touted as "green" and thus environmentally friendly. "Mixed use" is the City's code word for allowing increasing density on a property in the guise of bringing residences together with retail and service suppliers in one building; this allows the City to generate more taxes, and in theory is supposed to take cars off the road. "Mixed use" is the mantra for this Project now. "Live-Work" is the slogan used to support increased density in Century City over the last few years and it will no doubt be paraded out to justify this Project, given the likelihood that the residents of the average 3100 square foot condos in the principal residential building of the new development will all be walking to their jobs at the Westfield Mall and on Century Park East.

The one clever and pertinent buzzword that should easily be applied to the site as it currently exists is "adaptive reuse" the words used for downtown LA buildings turned from empty commercial hulks into trendy retail and living spaces. A mild adaptive reuse is no doubt the best treatment for the Century Plaza Hotel and its site, because the site is already used well. The Century Plaza Hotel and its lovely gardens and pools can be retained as a Hotel and the landmark, recognizable building of stature that it is. It's a jewel, as some people have said. The Project plan to reduce hotel capacity on this site from 726 rooms to 240 rooms will, of course, require the people who visit Century City and would have stayed in the 486 lost Century Plaza Hotel rooms to drive to and from the Century City area, thus increasing traffic on arterial and residential streets within a radius of several miles around the Project site. Saving those rooms will thus decrease traffic to and from Century City. Pedestrian modifications can be made to satisfy the folks (like former Councilman Jack Weiss), who championed change for Century City in the form of more greenery and more secure pedestrian walking across all the traffic lanes on Avenue of the Stars and Constellation Boulevard.

So it seems we have easy solutions for pedestrian accommodation in Century City and a way to creatively enhance the utility of the existing Century Plaza Hotel. There may even be some work for the building trades in it.

Whatever the claims of the developer and its many paid representatives in the campaign to get this Project permitted and built, the Project will have many impacts on the environment of Century City and its surrounding neighborhoods. Every issue that was studied for the recent adjacent Westfield Mall development project and the recent Constellation Place development project must be studied for the

Project. In particular, traffic pressures on Motor Avenue and Manning Avenue and intersections with cross streets through Cheviot Hills and into the Palms neighborhood, indeed the whole of Cheviot Hills and adjacent communities, must be studied for Project impacts, and mitigated. A detailed traffic study must be made and mitigations put in place to assure that increased traffic does not occur. The height of the proposed Project towers must be analyzed for all impacts. Impacts both during the construction process and the later operational ongoing life of the Project must be studied.

Please provide our organization with all notices, reports and materials at the above address with an additional copy to Gregory Pulis, 10331 Dunleer Drive, Los Angeles, CA 90064.

Thank you.

Cheviot Hills Home Owners' Association

A handwritten signature in blue ink, appearing to read "Gregory M. Pulis". The signature is fluid and cursive, with the first name "Gregory" and last name "Pulis" being more prominent than the middle initial "M".

Gregory Pulis, Vice President

cc: Kevin Hughes, President
Councilman Paul Koretz