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Environmental Review Section
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June 20, 2005

Response to Notice of Preparation of Draft Environmental Impact Report
10131 Constellation Boulevard, EAF# ENV-2004-6269-EIR

This response to the Notice of Preparation is being submitted by the Tract No. 7260 Association on behalf of its membership and the following homeowner groups:

The Tract 7260 Homeowners Association runs from Pico to Santa Monica and from Beverly Glen to Century City.

The Westwood South of Santa Monica Association (WSSM) runs from Pico to Santa Monica and from Beverly Glen to Sepulveda.

The Overland Avenue Community is a subset of the WSSM that covers residents on Overland Avenue between Santa Monica Boulevard and Pico Boulevard.

The Westwood Homeowners Association (WHA) runs from Santa Monica to Wilshire and from the country club to Sepulveda.

The Century Westwood Watch (CWW) group is a subset of the Westwood Homeowners Association that runs from Santa Monica to Wilshire and from the country club to Beverly Glen.

The Westwood Gardens Civic Association (WGCA) covers the area from Pico to National Blvds. and from Overland Ave. to Midvale Ave., anchored by the I-10/Overland interchange at the southeast corner.

The West of Westwood HOA covers(WOW) Pico to National, Kelton to Sepulveda and Overland to Patricia, Pico to Ashby.

Jointly, we make the following requests concerning the scope and content of the Draft Environmental Impact Report (DEIR) for the 10131 Constellation Boulevard project:

Geologic Hazards

We ask for a complete analysis of geologic hazards, including, but not limited to airborne debris that may be created by the project in the event of a major earthquake. The DEIR should address the distances such debris might travel and the impact of the debris.

Increased Risk of Terrorism

As the proposed project would be the tallest structure(s) in Century City, we request a thorough analysis of the increased risk that the project would represent to the residents of the project and to the existing community.

Air Quality/Noise Pollution

We request not only the standard analysis of the project's short-term and long-term air quality/noise impacts, but also the cumulative impacts of nearly a decade of "short-term" construction impacts faced by the Century City area.

In addition, given the proximity to existing oil wells, and the lawsuits concerning "toxic gases emanating from oil wells," at other nearby sites, we request a complete and thorough analysis of risks to the area during construction, to the area after construction and to potential residents of the project after construction.

Emergency Services

We are exceptionally concerned about the ability of the police and fire departments to maintain response capability given increased densification, decreased manpower and decreased funding. Further, given the terrorism risk mentioned above, a comprehensive analysis of increased first-responder requirements should be made.

Traffic

The DEIR must address the saturation of the west L.A. area in general. The arterial and freeway capacity must be addressed, as must the current Levels Of Service of west L.A. intersections.

The ambient growth shown in the DEIR must include projections for full occupancy of all existing structures and should also include an analysis of increased densification due to RAS issues. Further, we request that traffic counts, traffic distribution and other traffic-related topics remain consistent with past EIRs.

We request that any mitigation proposed be proven effective by independent analysis before it is considered for the project. This explicitly includes the need for a 3rd party independent analysis of the ATCS system given the Los Angeles Department of Transportation's conflict of interest. The analysis of the ATCS system must include capacity impacts at a variety of intersections.

Specific Areas Of Interest

We ask that the DEIR pay special attention to the impacts on:

1. The area bounded by Santa Monica on the north, Beverly Glen on the west, Century City on the east and Pico on the south. Specific attention should be given to cut-through traffic potential on Mississippi and La Grange.
2. Increased traffic flow on Century Park West.
3. The area bounded by Wilshire on the north, Beverly Glen on the west, Club View on the east and Santa Monica on the south. Special attention should be given to cut-through traffic which originates on the north/south streets on Santa Monica and terminates on either Beverly Glen or Wilshire.
4. The area bounded by Wilshire on the north, Sepulveda on the west, Beverly Glen on the east and Santa Monica on the south. Special attention should be given to Westholme Avenue as a major path to Wilshire and UCLA, and to Westwood Boulevard.

5. The area bounded by Santa Monica Boulevard on the north, Sepulveda on the west, Beverly Glen on the east and Pico on the south. Special attention should be given to cut-through traffic in the entire area as drivers seek to avoid clogged arterials.
6. Overland Avenue, specifically the portion which passes by the Westwood Charter school and the portion between Olympic and Pico.
7. Sawtelle Boulevard between Santa Monica and National. This street has become an alternate route for the traffic created by past projects.

Further, we request that the developers not be allowed to decrease traffic potential of the project by claiming that trip generation will be reduced by resident's use of intra-Century City facilities – both commercial and retail. In this regard, the EIR should contemplate the traffic generated by support staff for the building in addition to household employees who would be traveling to the building.

Tract 7260 also concurrently submits the attached traffic review by its traffic consultant, Tom Brohard & Associates. We request that the topics raised in the review also be included in the DEIR.

Land Use/Zoning

The EIR must address the accuracy of Century City North Specific Plan trip counts including, but not limited to all issues raised in Tract 7260's current lawsuit against the City of Los Angeles including any trips awarded or to be awarded for existing uses.

Schools

Given that the project is a residential project, we request a thorough analysis of the impact on already overcrowded local schools – especially at the elementary school level.

The homeowner associations listed above look forward to a careful review of the Draft Environmental Impact Report and trusts that each of the above topics will be thoroughly addressed.

Sincerely,



Michael Eveloff
President

Tract No. 7260 Association, Inc.