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Response to Notice of Preparation of Draft Environmental Impact Report  
Westfield New Century Plan, Case# ENV-2006-1914-EIR

This response to the Notice of Preparation is being submitted on behalf of the following homeowner groups and their respective memberships:

**California Country Club Homes Association** covers the area from Queensbury to Club and Forrester to Manning.

**Cheviot Hills Homeowners Association** represents the residents of Cheviot Hills.

**The Cheviot Hills Traffic Safety Association** is focused on traffic impacts within the Cheviot Hills area.

**The Manning Area Protection Association** covers the area south of Pico, east of Overland, west of the western boundary of the Rancho Park Golf Course, and north of Butterfield.

**The Overland Avenue Community** is focused on impacts along Overland Avenue between Santa Monica and Pico Boulevards.

**The Tract No. 7260 Homeowners Association** covers the area from Pico to Santa Monica and from Beverly Glen to Century City.

**Westwood Homeowners Association** covers the area from Wilshire to Santa Monica and Sepulveda to the country club.

**Westwood Gardens Civic Association** covers the area from National to Pico and from Midvale to Overland Avenue and Dunleer Place.

**Westwood South of Santa Monica Homeowners Association** covers the area from Beverly Glen to Sepulveda and Pico to Santa Monica.

Jointly, we make the following requests concerning the scope and content of the Draft Environmental Impact Report (DEIR) for the Westfield "New Century Plan":

**Geologic Hazards**

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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. The DEIR

should address the new earthquake potentials discussed in the new Scripps Institution of Oceanography study.

### **Increased Risk of Terrorism**

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As the proposed project would be one of the tallest structures in Century City, we request a thorough analysis of the increased risk that the project would represent to the residents of the project, the patrons of the Century City Mall and to the existing community.

### **Air Quality/Noise Pollution/Hazardous Materials**

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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.

There are specific concerns related to noise generated along Century Park West which is directly adjacent to residential homes on Fox Hills Drive. This includes noise generated from traffic and mechanical sources within the existing mall property and proposed project.

In addition, given the proximity to existing oil wells, and the existence of known toxic sites to the north (Beverly Crest Cleaners), 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.

The DEIR must address the potential for methane, oil, and other potentially toxic materials on site.

### **Emergency Services**

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

The DEIR must address evacuation and/or emergency response plans for the project.

An analysis of the ability of existing LAPD and LAFD stations to provide service to the existing community and the newly proposed project with current staffing levels is requested.

Given that the project will result in a 43% increase in shopping mall area as well as a new residential population, impacts on first-responder capabilities in the event of a natural or man-made disaster is requested.

LAPD records for crimes related to retail-shopping center operation (ie: shoplifting, burglary from cars, burglary of cars, purse-snatching, etc. should be accessed to determine what kind of additional calls might be expected from a doubling of the retail shopping space at this location.

### **Traffic**

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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 and other developments (both proposed and under construction) in nearby Beverly Hills. Further, we request that traffic counts, traffic distribution, trip generation and other traffic-related topics remain substantially consistent with past EIRs.

We request that actual traffic figures be provided wherever possible. We request that for the condominium units, rates of 7.55/unit per the CCNSP and past Century City EIRs be applied.

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 3<sup>rd</sup> 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:

1. The area bounded by Santa Monica on the north Sepulveda Blvd. on the west, Century City on the east and National Blvd. 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. Impacts on Motor Avenue, Manning Avenue and adjacent streets, with an emphasis on stemming their use as a pathway for out-of-neighborhood commuters.
4. Impacts on Overland Avenue between Santa Monica and Pico Boulevards, with an emphasis on stemming its use as a pathway for out-of-neighborhood commuters.
5. Impacts on Westwood Charter School students as a result of increased traffic and pollution should be studied.
6. Impacts on Overland Avenue between Pico and the 10 freeway with an emphasis on its use as the main arterial into the Century City area from the 10 freeway. This includes Impacts on residents, students of two elementary schools and one high school, a library, and a community center as a result of increased traffic, pollution, and safety issues on this one mile arterial stretch.
7. Impacts on the area bounded by Wilshire on the north, Sepulveda 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. Special attention should also be given to the traffic which uses residential streets to access the Beverly Glen and /or Roscomare routes to the San Fernando Valley. Finally, special attention should be given to Westholme Avenue as a major path to Wilshire and UCLA, and to Westwood Boulevard.
8. 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. While the north-south streets with signal crossing of arterials are at highest risk (Veteran, Overland, Prosser), all streets in the grid patterned area, both north-south and east-west are of concern.

9. Sawtelle Boulevard between Santa Monica and National. This street has become an alternate route for the traffic created by past projects.
10. Manning, Prosser and Patricia south of Pico, east of Overland, west of the western edge of Rancho Park Golf Course, and north of Butterfield. Cut-through commuter traffic is already a serious problem on these residential streets, and future development in Century City, if allowed, needs to provide and pay for traffic mitigation measures that keep the cut-through traffic from worsening traffic conditions in this area, particularly on Manning, Patricia and Prosser.
11. Olympic Blvd. needs to be studied in its entirety from Robertson to Bundy. The peak morning and afternoon travel periods find Olympic Blvd. often gridlocked from Century City on the east to Barrington Avenue and beyond on the west. This impedes the ability of local residents to leave their community to access schools and places of work in a timely manner in the morning and to access their homes in the afternoon /evening hours.

We request that the following intersections be specifically studied in addition to those already listed:

- Westholme/Santa Monica
- Westholme/Wilshire
- Prosser/Olympic
- Prosser/Pico
- Veteran/Santa Monica
- Veteran/Olympic
- Veteran/Pico
- Sepulveda/Olympic
- Westwood/Pico
- Westwood/National
- Manning/Pico
- 10 On/Off ramps at National, Overland and Manning.
- Comstock/Wilshire
- National/Sawtelle
- National/Overland
- National/Motor

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 itself in addition to household employees and personal staff of residents who would be traveling to and from the building.

Whether or not the project and the City acknowledge the traffic, parking, and cumulative infrastructure impacts of the project, clearly Century City and West LA cannot thrive without better access to and usage of public transit. The EIR must address this problem and include mitigation of cumulative impacts. One excellent solution would be for the project to include in its design a transit station (subway or LRT) or at least include the excavation and structural components thereof. By doing so, a future extension of the Red Line or other system would be enhanced, future construction would not disrupt the mall or surroundings, the value of the residential units would be enhanced, and the project could claim a real benefit to the community, albeit a long term one. Also included in the EIR should be a discussion of the

pedestrian connections to the rest of Century City, including how a transit station would be accessed, and all possible measures to encourage pedestrians, use of shuttle around Century City, and near term solutions.

### **Land Use/Zoning**

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The DEIR must address the true nature of the changes which will be required in the Century City North Specific Plan. The Notice of Preparation was materially lacking in its presentation of the required changes. This includes but is not limited to Shopping Center trip caps, Development Right (Trip) transfer restrictions, blending non shopping center Trips with shopping center Trips, Trip rates that will be used for the different uses on the combined parcel and determinations relating to Trip uses contained within the CCNSP.

The DEIR must address the other impacts of merging parcels such as the impact on any and all conditions placed on each property.

The DEIR must discuss where the developer will be acquiring the required development rights and when those rights will become available. It is the community's understanding that the proposed project is dependent upon a certain number of Trips being available from third parties. Thus, the actual project may differ so substantially from the proposed project that the community will not have adequate ability to comment.

The DEIR must address the Drive-Through Bank Trips on the 1930 Century Park West building and the impacts to the project should the community successfully challenge the justification for those Trips.

The DEIR must address compliance with past conditions on the Century City Mall, including the provision for 15,000 feet of public use space cited in section 7 of the CCNSP.

The DEIR should also address and take into account the retail space created by the use of portable retail kiosks within the project area.

### **Schools**

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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. While the project residents may or may not have children of school age, it is a common practice for grandparents of school-age children to use their address to register their grandchildren in local high-performing schools.

### **Public Utilities**

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The DEIR must address impacts on public utilities given problems that existing Century City condominiums have had with water pressure.

The DEIR must analyze the City's sources of drinking water in drought years and ensure that adequate supplies are available for all residents and this proposed development.

Further, with power disruptions increasing city-wide, it is clear that the impact on all utility infrastructures must be examined.

## **Construction Impacts**

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The EIR must address both the immediate and cumulative impacts of construction, including a detailed construction scenario, proposed haul routes, times of construction and the length of the construction period. An additional 4 years of construction extends double-digit years the continuous "temporary" construction impacts on the neighborhood and commuters of Century City since the Fox expansion and the Constellation Place projects.

## **Aesthetics/Privacy**

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The DEIR must study light/glare issues relating to both structural and vehicular sources in the area and impacts on adjacent residential property.

The DEIR must also address potential privacy issues for Fox Hills residents.

## **Parks & Libraries**

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The increased residential population proposed by this project and others will necessitate increased park space and library space. The DEIR should present solutions to these two issues including locations of property available for both public park and library development, including possible locations on the project site.

## **Economic**

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The DEIR must address the disruption of business to current Century City businesses and to businesses along Santa Monica Boulevard which have been heavily impacted by the Santa Monica Boulevard Transit Parkway Project. This includes a discussion of interaction with other Century City projects with regard to haul routes and the economics of introducing so many high-end residential units into the local economy at the same time.

## **Quality Of Life/Cumulative Impacts**

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The DEIR must address the degradation of the quality of life in the West L.A. area as a result of development including the impacts of the incremental "less- than-significant" effects of past and current projects. This includes the effects of an overburdened infrastructure in virtually every area.

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. We request that each is notified individually of any and all public meetings, hearings, haul route hearings, and city actions on this project.

Sincerely,

 <p>Jennifer Hannon President California Country Club Homes Association Post Office Box 64488 Los Angeles, California 90064</p>	 <p>Gregory M. Pulis Vice President Cheviot Hills Homeowners Association 10576 Troon Avenue Los Angeles, CA 90064</p>	<p><b>No Signature Submitted</b></p> <p>Lyle Dawn President Cheviot Hills Traffic Safety Association National Registered Agents, Inc. 2030 Main Street, Suite 1030 Irvine, CA 92614</p>
<p><b>No Signature Submitted</b></p> <p>William T. Coleman Kathleen P. March, Esq. Steering Committee Manning Area Protection Association c/o Kathleen March, Esq. 2618 Manning Avenue Los Angeles, CA 90064</p>	 <p>Overland Avenue Community Shannon Burns Organizer 2305 Overland Avenue Los Angeles, CA 90064</p>	 <p>Michael Eveloff President Tract No. 7260 Association, Inc. 10342 Dunkirk Avenue Los Angeles, CA 90025</p>
 <p>Annette Mercer President Westwood Gardens Civic Association 2647 Glendon Avenue Los Angeles, CA 90064</p>	 <p>Aviv Tuchman President Westwood Homeowners Association 1255 Club View Drive Los Angeles, CA 90024</p>	<p><b>No Signature Submitted</b></p> <p>Barbara Broide President Westwood South of Santa Monica 2001 Malcolm Avenue Los Angeles, CA 90025</p>