

Fix The City Inc.

William Lamborn
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Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

May 11, 2016

Case No: ENV-2015-4365-EIR/Fox Studios Master Plan

Mr. Lamborn,

Please accept this letter as Fix The City's initial comments on the Notice of Preparation for ENV-2015-4365-EIR.

The DEIR for the project should address the following issues:

1. Consistency and compliance with the Century City South Specific Plan(CCSSP).
2. Consistency and compliance with the Century City North Specific Plan(CCNSP).
3. Consistency and interaction between the CCNSP and CCCSP, including a thorough review of the legislative history of each.
4. Consistency and compliance with the Century City Neighborhood Transportation Mitigation Plan(CCNTMP).
5. Consistency and compliance with the existing West Los Angeles Community Plan.
6. Consistency and compliance with the General Plan and General Plan Framework, including consistency with legal rulings which discussed the meaning of the GPF and its mitigation policies and including consistency with City comments that "The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services."
7. Consistency and compliance with the existing West LA TIMP.
8. Findings of adequate actual infrastructure capacity with regard to at least police, fire, water, sewerage, parks, and traffic circulation.
9. Use of an updated Urban Water Management Plans (2015) not 2010 which did not address drought conditions.
10. Use of updated air quality studies that take into account the impacts of the Aliso Canyon leak.
11. Detailed study of Level of Service, Vehicle Miles Traveled and Vehicle Hours Traveled for the West LA area.
12. An analysis/validation of traffic forecasts made by other project EIRs, including those made in documents relating to prior development on the project site.
13. Assurances, claims and mitigations provided as part of previous EIRs and development agreements relating to the property.
14. A detailed analysis of oil and gas drilling in and around the project site including all pipelines, active and inactive.
15. A detailed discussion of the project's proximity to the Newport-Inglewood-Rose Canyon fault line including use of the latest CGS data for West LA when it becomes available.
16. Impacts on the 10 and the 405 freeway.
17. All traffic studies should use data gathered after the Expo line is operational as any other data would be inherently flawed.
18. Impacts on all residential communities in the study area, including cut-through traffic, which include analysis of new traffic patterns once the Expo light rail is operational.
19. Consistency with past LADOT statements that no further physical mitigations are available to mitigate traffic impacts.
20. Consistency with past LADOT findings of West LA/Century City transportation infrastructure capacity.
21. Address former LADOT official John Fisher's comments in 2008 that "We have the worst cut-through traffic of any area of the City. It's due to the fact that development has continued without proper infrastructure."
22. Use of traffic counts which reflect actual traffic generated by current projects approved and under construction in Century City.
23. Address adequate LAFD response times for the all applicable stations which specifically address NFPA1710 response metrics as described by the LAFD at council, not merely average response time. Response times should include impacts of demand generated by current projects approved and under construction in Century City as well as reduced first-responder mobility caused by the Expo line and by MP2035.
24. A detailed analysis of MP2035 in each of its various forms including if MP2035 is rejected by the courts including those areas in Century City which are covered by MP2035.
25. Inclusion of a proper set of alternatives.
26. We ask that the EIR pay special attention to:
 - 26.1. Increased traffic flow on Century Park West.
 - 26.2. Increased traffic flow on Century Park East.

- 26.3. Increased traffic flow on Olympic Boulevard.
- 26.4. Increased traffic flow on Santa Monica Boulevard.
- 26.5. Increased traffic flow on Pico Boulevard.
- 26.6. Impacts of the proposed Expo overlay zone.
- 26.7. Impacts on residential area ingress/egress issues related to the above.
- 26.8. Impacts on Motor Avenue, Manning Avenue and adjacent streets, with an emphasis on stemming their use as a pathway for out-of-neighborhood commuters.
- 26.9. 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.
- 26.10. Impacts on Westwood Charter School students as a result of increased traffic and pollution.
- 26.11. 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.
- 26.12. Pathways through Beverlywood including Beverly Drive and Beverwil.
- 26.13. The EIR must not be allowed to assume or take credit for mitigations and/or transit improvements that do not currently exist or those that have been claimed by other projects.
- 26.14. Mitigations must be realistic. TDM proposals, if offered, must be proven to be effective and realistic.
- 26.15. The project should not be allowed to claim consistency with city transportation policy without clarification on what the real policy of the city is with regard to traffic. We have been given conflicting information on what works, what is needed and what should be done. This can be clearly seen given the differing and inconsistent goals of MP2035 and the proposed West LA TIMP.
- 26.16. The EIR must study interaction with the Santa Monica Airport traffic patterns.
- 26.17. The impacts on public safety, traffic and ingress/egress for residential areas related to the proposed new Century Park West/Olympic access point.
- 26.18. Quality of life impacts for those living in the area immediately to the west of the project site.

We further request a copy of all correspondence including any initial studies that have been submitted to the city, whether in draft or final form. If an Initial Study has not been prepared, one should be prepared and circulated for public scrutiny.

We look forward to a careful review of the Draft Environmental Impact Report and active involvement with the entitlement process for this project.

We request that Fix The City be notified of any and all public meetings, hearings, haul route hearings, and city actions on this project. All correspondence should be via email to FoxProject@FixTheCity.Org.

Sincerely,

Fix The City