



August 29, 2020

Mr. Kin Hui  
Chief Executive Officer  
Singpoli  
*Via email*

Dear Mr. Hui:

Singpoli has indicated its intention to spend hundreds of millions of dollars at the BKK landfills for the development it has proposed there.

We continue to believe the West Covina Plaza Mall remains a better business decision and investment.

Effective August 1, 2020 JLL now manages the Plaza Mall, the direct result of the severe financial distress that Starwood is under. Recently we also became aware that Starwood's proposed major redo of the Plaza Mall (designed by Jones Lang LaSalle) is now on an indefinite hold.

That redo would have transitioned the Mall from an enclosed retail property to one that included a hotel, residential units, professional office space, an entertainment complex, restaurants, and a footprint for retail shopping that is smaller than the Plaza Mall's today. In addition, the layout of the Mall redo was open and inviting, encouraging people to live, dine, shop, walk, play and linger.

Starwood's documents indicate the value of the Plaza Mall has an estimated of about \$200 million. An inflated figure to be sure; one that does not recognize

current conditions or account for forward-looking uncertainty.

We strongly encourage to Singpoli to thoughtfully examine the Plaza Mall property and consider it a better business decision for hundreds of millions of dollars. If not the Plaza Mall in its entirety, the former location of Sears – that footprint is already available for your proposed hotel.

The following are just some of the advantages of Plaza Mall location versus the BKK landfill lands:

- No contaminated land at the Plaza Mall.
- Not adjacent to California's largest toxic hazardous waste landfill, which is unlined.
- At the Plaza Mall all infrastructure is already in place (e.g, roads, gas, water, electricity, sewer, firefighting). At the 134 acres of city owned land at BKK, any and all such infrastructure is entirely absent.
- Compliance with the California Environmental Quality Act (CEQA) has already been completed and the Plaza Mall redevelopment plans appear to have been CEQA compliant based on the limited publicly available information.
- No State or Federally protected habitat areas exist at the Plaza Mall. There are no existing commitments/agreements for habitat restoration at the Plaza Mall. There is no wildlife corridor at the Plaza Mall that must remain intact.
- As Singpoli is now aware, portions of the 134 acres of city owned land at BKK include significant covenants and restrictions, which preclude structures in multiple places. Abiding by those severely impacts development plans at BKK or requires lengthy State and Federal

processes to change the covenants and restrictions, with no guarantees of success.

- At the Plaza Mall either no zoning changes are necessary or very limited ones are needed – depending on what Singpoli decides to do.
- The land at the Plaza Mall is not still legally part of the BKK landfills.
- Unlike the city owned land at BKK, the Plaza Mall does not contain infrastructure associated with a vast landfill gas monitoring and extraction system and an almost equally large contaminated groundwater monitoring and extraction system.
- As you are aware the State’s Engineering Evaluation and Cost Analysis (EECA) at BKK is in progress. That will result in a major project including complete replacement of the systems noted above and an additional cap & cover on the Class I toxic hazardous waste landfill. That work will extend well beyond the footprints of both landfills. The California Department of Toxic Substances Control (DTSC) and the Department of Resources Recycling and Recovery (CalRecycle) have already repeatedly indicated that any development plans at BKK will be entirely subordinate to the EECA work and responsibility rests exclusively on Singpoli to demonstrate how it will not interfere in any manner with the work resulting from the EECA. All of this is fully avoided at the Plaza Mall.
- Maintenance activities at the BKK landfills will continue in perpetuity. Earlier this month you received just a sample of one monthly report discussing those activities. Again, the DTSC and CalRecycle have already repeatedly indicated that any development plans at BKK will be entirely subordinate to on-going landfill related maintenance activities and responsibility rests exclusively on Singpoli to produce, maintain and abide by detailed plans to operate and maintain its hotel at BKK and all other facilities in a manner that does not interfere with State and Federally

required routine maintenance activities at BKK.

- At the Plaza Mall, Singpoli would likely enjoy a majority of community support.
- **Redevelopment at the Plaza Mall would allow Singpoli a much quicker and more certain return on investment.**
- The Plaza Mall enjoys almost unparalleled freeway access and visibility and in that regard is already considered one of the premiere commercial locations in the eastern San Gabriel Valley. Conversely the BKK lands are stranded between the 10 and 60 freeways and primary access is via Azusa Ave, which is already West Covina's most heavily traveled street. The intersection of Azusa Ave and Amar Road directly southwest of the entrance to Singpoli's proposed development at BKK is also one of the city's most heavily trafficked.

We strongly urge Singpoli to take advantage of current economic conditions and consider redevelopment of the Plaza Mall as an alternative to its present plans at the BKK landfills.



Brian Jobst

Co-founder, Livable West Covina

[www.LivableWestCovina.org](http://www.LivableWestCovina.org)

Cc: United Walnut Taxpayers  
West Covina Improvement Association  
Change West Covina  
Sierra Club San Gabriel Valley Task Force

Sierra Club Angeles Chapter  
San Gabriel Valley Progressives  
West Covina City Council  
Candidates for West Covina City Council  
West Covina Planning Commission  
DTSC  
CalRecycle  
U.S. Environmental Protection Agency  
California Department of Fish and Wildlife  
U.S. Fish and Wildlife Service  
South Coast Air Quality Management District  
Los Angeles Regional Water Quality Control Board  
U.S. Army Corps of Engineers  
City of West Covina Local Enforcement Agency  
City of West Covina City Manager  
City of West Covina Assistant City Manager  
City of West Director of Economic Development  
City of West Covina Planning Manager  
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