

PACIFIC PALISADES COMMUNITY COUNCIL

The Eyes, Ears, and Voice of the Pacific Palisades Community
Post Office Box 1131, Pacific Palisades, California 90272

June 15, 2002

Maya Zaitzevsky,
City Planning,
City Hall, Room 763,
200 North Spring Street,
Los Angeles, California 90012

RECEIVED
CITY OF LOS ANGELES

JUN 18 2002

ENVIRONMENTAL
UNIT

Re: Palisades Landmark Condominium Project
17331-17333 Tramonto Drive, Pacific Palisades
EAF NO. ENV-2000-2696
Applicant, Palisades Landmark, LLC
Tentative Tract Map. No. 52928

Dear Ms. Zaitzevsky:

Given the grave concerns raised by both the community and the Pacific Palisades Community Council Board, the Board, in response to the Notice for Pre-draft Request for Comments for the subject project, submits the following comments.

Since the Project requires a Coastal Development Permit, the following concerns regarding geological stability need to be addressed. Despite the Applicant's Note No. 7 in its Vesting Tract Map that the Project is not known to be located in a hazardous area, it is in fact located in a geologically hazardous area evidenced by the fact that the Applicant is required to repair the Revello Landslide and the plans show the installation of 54 soldier piles clearly indicates that the Project is located in a geological hazardous area. Moreover, USGS Survey Maps indicate that there are local debris slides located on the property and that the south side of the property is located in or immediately adjacent to a historic slide.

Therefore, the Project is subject to Public Resources (Coastal Act) Section 30253 which states:

"New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs."

As part of the geologic reports, there should be included readings from slope inclinometers, and from peizometers which have been in place for three years.

All pilings should be anchored in bedrock below sea level because the bed rock that is above sea level is probably fractured and incapable of supporting any pilings over time.

Also since the Project will be clearly visible from the beach and the ocean, as well as from two Scenic Corridors, Sunset Blvd., and Pacific Coast Highway, it is subject to Public Resources Code Section 30251 which states:

"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting."

This Project will alter natural land forms and must be visually compatible with the character of surrounding areas, its visual effects must be considered. The Project will substantially alter the existing character by replacing two story buildings with four story buildings as well as remove substantial screening vegetation. Consideration should be given to maintaining the existing view by limiting construction to two stories or the existing heights and replacing any trees that are removed.

The Project will quadruple the amount of traffic generated by the existing development. The amount of traffic that this Project will generate is too much for Tramonto Drive to accommodate, particularly at the point that the driveway will intersect with Tramonto. The intersection is located on a steep downward curve. Traffic entering the driveway from below the intersection will have to enter on a blind curve. The additional traffic will create a burden on Los Lions Drive and will necessitate the installation of a traffic signal at its intersection with Sunset Blvd. That will create further delays on Sunset and impede the flow. The traffic impacts will be exacerbated by the cumulative development of adjacent properties to the north.

The Project will generate considerable construction traffic, particularly during excavation. It will take over a thousand trips to export and import all the earth. Neither Tramonto Drive or Los Lions Drive can withstand the weight of all the trucks. As a mitigation measure, it should be considered significantly reducing the size of the project so as to substantially reduce the amount of earth that must be exported or imported or require the Applicant to repave Tramonto and Los Lions east of its intersection with Tramonto either before construction to sustain the heavy loads, or repave them afterwards to repair the damage.

There are concerns about entering and exiting in the event of a disaster for those who live on the Castellammare Mesa. Tramonto Drive is the entrance and exit on the east of the Mesa and Porto Marino Drive is the entrance and exit on the west. There are two concerns. First is that geologists have reported that the area above Porto Marina from Revello Street is an active slide and that a major landslide could occur at any moment which could close Porto Marina and force all traffic from the Mesa to use Tramonto Drive, putting all the traffic burden on Tramonto. The second concern is that if it is necessary to evacuate the Castellammare area because of a disaster, such as a brush fire, will the added traffic coming from the Project hinder the evacuation of Castellammare.

Lastly, the Council is concerned about how the existing tenants will be housed after they are evicted for construction. While the Mello Act permits other remedies besides providing existing tenants with comparable units in the completed Project, evictions will result in significant adverse environmental impacts on the environment of the tenants and this should be discussed in the EIR.

Sincerely yours,



HARRY SONDHEIM, *Chairman*

cc: Councilwoman Cindy Miscikowski

Jack Allen

Attorney at Law

15015 Bestor Boulevard,
Pacific Palisades, California 90272

(310) 454-2062

Fax (310) 454-8037

June 15, 2002

RECEIVED
CITY OF LOS ANGELES
JUN 18 2002
ENVIRONMENTAL
UNIT

Maya Zaitzevsky,
City Planning,
City Hall, Room 763,
200 North Spring Street,
Los Angeles, California 90012

Re: Palisades Landmark Condominium Project
17331-17333 Tramonto Drive, Pacific Palisades
EAF NO. ENV-2000-2696
Applicant, Palisades Landmark, LLC
Tentative Tract Map. No. 52928

Dear Sirs:

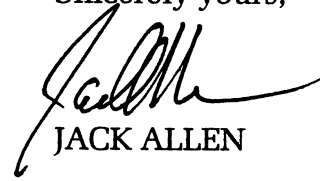
In response to the Notice for Pre-draft Request for Comments for the subject project, I wish to amplify some of the comments made in the letter from the Pacific Palisades Community Council, which I drafted.

In relation to the construction traffic there will be in addition to the dump trucks moving earth on Tramonto, there will be a very large flow of very heavy cement trucks. The project calls for over 50 soldier piles and a 205 car garage which will require large amounts of concrete. The Applicant needs to calculate the number of cubic yards of concrete that will have to be delivered to the project and the number of cement trucks that will be required. Another problem is because the entrance and exit to the project site is on a dangerous curve it will be necessary to have at least two flagmen to shut down traffic when the trucks enter and leave the site. This will add to the traffic delays for residents in Castellammare.

Another factor to be considered is construction noise. Because of the location of the project and its proximity to other multiple family residential buildings which will reflect and amplify the construction noise, the noise will have a greater impact than normal. The noise and vibration will be particularly irritating during the installation of the soldier piles, both during the drilling of the holes and the pile driving of the steel reinforcing beams. Truck traffic in and out of the project will be particular source of noise. To mitigate this, construction hours should be restricted so that construction and delivery of materials do not commence prior to 8AM in the morning when most residents will be at work and after 5PM in the afternoon when most

residents will have returned. Construction should not permitted on Saturdays or Sundays.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Jack Allen', written in a cursive style with a long horizontal flourish extending to the right.

JACK ALLEN

June 15, 2002

Maya Zaitzevsky, Project Coordinator
City of Los Angeles, Department of City Planning
200 North Spring Street, Room 763
Los Angeles CA 90012

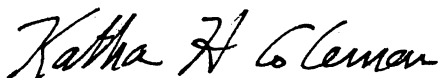
RECEIVED
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Dear Ms Zaitzevsky,

I am writing to express concerns about a proposed project 82 unit condominium project at 17331-17333 Tramonto Drive, Pacific Palisades. This property accesses Tramonto Drive one block away from my properties at 17455 and 17463 Tramonto Drive. The proposed project is near a number of lots that are zoned RE-15 and are, in fact, required to be much larger than 15,000 square feet per single family residence, such as the lots in Parcel Map 5938 and Tract 50232, which were initially proposed as multiple unit projects but limited to four units each for lots of four and a half acres and two acres.

The impact of the proposed project on the people living in the single family houses in Castellammare is significant and needs to be addressed as part of the Environmental Impact Report. My main concerns are traffic and density issues. To allow 205 parking spaces to access what is now a treacherous substandard street, which can be made wider but not less steep or less of a curve, is completely inappropriate. Ocean Woods Terrace, the condominiums adjacent to 17331 and 17333 Tramonto, is a building of inappropriate scale and massing for the area and should in no way be used as a precedent for allowing the excesses proposed for the adjacent property. As well, I have concerns about the removal of 100,000 cubic yards of soil, and about the geology, and potential for landslide. The project will generate excessive grading, worsen water runoff, impact plant and animal life, and further deplete the area's resources.

Sincerely,



Katharine H. Coleman

L. Randall and Billy Eve Koenig

258 Nottteargenta Road
Pacific Palisades CA 90272-3110

June 13, 2002

RECEIVED
CITY OF LOS ANGELES

JUN 18 2002

ENVIRONMENTAL
UNIT

Maya Zaitzevsky, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, CA 90012

Dear Ms. Zaitzevsky:

Subject: EAF No: ENV-2000-2696-EIR

The location of this project, 17331-17333 Tramonto Drive, is crucial for those of us who live in the Castellammare neighborhood of Pacific Palisades.

We have lived here since February 1964 and since that time there have been several slides, which have resulted in the closing of streets in Castellammare. We are now reduced to 2 streets for ingress and egress – Porto Marina and Tramonto Drive. Both of these streets have been closed because of slides and were later restored – thankfully, these slides did not occur at the same times.

In the winter of 1965 -1966 Tramonto Drive became unstable because the adjoining condo building was in danger of collapsing due to sliding mud. With quick action of the lender, stabilization began, but Tramonto Drive was impassable for about a year while the apartment building was worked on.. All the residents of the 300 homes on Castellammare could only use Porto Marina, a narrow road that due to earth slippage is grotesquely and dangerously tilted. Porto Marina connects directly to the Pacific Coast Highway which already is severely traffic impacted as it is.

One of my concerns is that this proposed project will result in damage to Tramonto Drive that will render the street impassable for long periods of time as it was in 1965 – 1966. Aside from severe inconvenience this would surely hinder emergency equipment—fire and police and paramedics which need to get to the homes quickly, when minutes count. All the trucks that would be involved in moving 100,000 cubic yards of earth would also severely impact passage on these narrow, twisting roads.

Access should be carefully considered in the proposal for this project. It seems to us that if the City of Los Angeles approves this large project and the destruction of Tramonto Drive occurs, the possibility is very great for legal action if emergency vehicles cannot reach homes in a timely manner.

Sincerely,

L. Randall Koenig
Billy Eve Koenig

ELENA GREEN
17337 Tramonto Drive, #308
Pacific Palisades, CA 90272

June 4, 2002

RECEIVED
CITY OF LOS ANGELES

JUN 18 2002

ENVIRONMENTAL
UNIT

Maya Zaitzevsky, Project Coordinator
Department of City Planning
Environmental Review Section
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, CA 90012

Re: Palisades Landmark Condominium Project; ENV-2000-2696-EIR

Dear Ms. Zaitzevsky:

This letter is in response to the Pre-Draft Request for Comments for the above-referenced project located at 17331-33 Tramonto Drive.

I am an owner in the Ocean Woods Terrace Condominium, which is just above and on the same hillside as this project. You can imagine that I am extremely concerned about this proposal. By this letter we request that a full EIR address the following concerns:

1. **Aesthetics.** How it will affect the aesthetics of this neighborhood.
2. **Hazards and Hazardous Materials/Environmental Effects.** I believe the construction of such a huge project will be harmful to our environment.
3. **Geology and Soils.** As I'm sure you know, this area has suffered in the past from slippage. I believe this project is dangerous to our safety.
4. **Seismic Activity.** This area has suffered severe damage from seismic activity, most recently the Northridge Earthquake of 1994.
5. **Noise.** The noise and distress of years of construction will be significant.
6. **Traffic.** The additional traffic on Tramonto Drive, which is already suffering the effects of over-development, will be a serious problem.

Thank you for your attention to this matter.

Sincerely,


Elena Green

Danny Cohen, PhD
17432 Revello Drive
Pacific Palisades, CA 90272

RECEIVED
CITY OF LOS ANGELES

JUN 18 2002

ENVIRONMENTAL
UNIT

June 6th, 2002

Maya E. Zaitzevsky, City Planning Associate
Environmental Review Section
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012-4801

Re: Palisades Landmark Condominium Project, Pacific Palisades
(EAF NO: ENV-2000-2696-EIR)

The documents that we have received for a pre-draft request for comments are incomplete. This makes it difficult for us to properly evaluate the project impacts on our own property and on the neighborhood. The project provides us with a site plan (we know our neighborhood) and rough development footprints which come precariously close to our property. However, the documents mailed to us do not include any elevation sketches and are devoid of specific details.

We understand that the project is proposing a tremendous impact on us, on our neighborhood and on Pacific Palisades in return for its claim to repair the Revello landslide. In proposing to demolish 20 apartment units, and requesting a tremendous increase in square footage through the development of 25 three-level townhouses (3,000 square feet each) and 57 four level, three-bedroom condominiums (2,300 square feet each) along with 205 parking spaces, is the City guaranteeing that the slide will be fixed and that there are no further impacts on the neighborhood, especially our own property? Please clarify this!

Let us know now whom to sue if this optimistic promise turns out not to hold.

Estimate that this will add at least 165 cars to the traffic on Tramonto (the additional 205 car for each of the 20 demolished apartments). Since this traffic will join and leave Tramonto at a very steep section, with a sharp turn, it is necessary to evaluate the effect of the proposed condos on the safety of the traffic.

Needless to say the project will have a tremendous impact on local traffic which is already overburdened. It will also have a tremendous noise impact not only on the neighborhood but on us who look down directly on the condos and the parking spaces they provide. Will we be able to sleep anymore at night?

What about the view impacts? How will TV and other electronic reception be affected? The documents provided do not show any elevation sketches. Should the project not be flagged to show the building rooflines so that a proper viewshed evaluation is possible prior to providing these comments?

To whom shall we turn if the undermining of the slope below us for the excavation of the condos destabilizes our own property? Will the City guarantee slope stability and the safety of our home that we have lived in for about 15 years?

There are extensive underground water channels in the area of the Revello slide. What effect will the addition of millions of pounds of fill have on these channels. Will underground water flow be diverted and where? Will the City guarantee the stability and safety of the homes and structures on the hill that may be impacted by changes in the underground water flows?

These are just some of the immediate concerns we have.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cohen". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Danny Cohen, PhD

Ocean Woods Terrace Condominium
HomeOwners Association
17337-39 Tramonto Dr. #206
Pacific Palisades, CA. 90272

June 12, 2002

Maya Zaitzevsky, Project Coordinator
Department of City Planning
Environmental Review Section
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, CA. 90012

RECEIVED
CITY OF LOS ANGELES

JUN 18 2002

ENVIRONMENTAL
UNIT

Re: Palisades Landmark Condominium Project:ENV-2000-2696-EIR

Dear Ms. Zaitzevsky,

I am writing to you in response to the Pre-Draft Request for comments for the above Referenced project located at 17331-33 Tramonto Drive.

I am a resident at the Ocean Woods Terrance complex located just above the proposed Project. As I'm sure you have heard from most of the Ocean Woods homeowners I too am very concerned with this proposed project. As a first time homeowner I Will do everything in my power to make sure my home is a safe and secure place to Live and the Landmark project threatens my security in everyway. The hillside over the years has had a history of instability and not to mention the added noise, Traffic, pollution in an already heavily populated area. I paid a lot of money to live Where I live and I don't want that destroyed over corporate greed. The environmental Issues are enormous to say the least, I have listed them below:

A). Aeshtetics, Air quality, Geology and Soils Hazards/slide potential, noise And water quality, utility usage increase and overall added traffic/pollution.

All of these things will not only hinder the quality of life but will decrease the Value of my property. I worked hard to buy my first home and it's very Sad to see a potential project such as this come along and completely undermine My way of life.

I would like to thank you in advance for you attention to this matter and I will look Forward to receiving a full EIR report and I will be attending all public hearings Regarding this project.

Best Regards,


Lisa Caughren

6/12/02

Robert Italia
17337 Tramonto Drive
Pacific Palisades, CA 90272

Maya E. Zaitzevsky, Project Coordinator
200 North Spring Street
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES
JUN 18 2002
ENVIRONMENTAL
UNIT

Re: EAF NO: ENV-2000-2696-EIR

Dear Ms. Zaitzevsky:

As a concerned resident of the Ocean Woods Condominium Complex, I am providing comments for the environmental impact report that is to be prepared for the proposed Palisades Landmark Condominium Project located at 17331-33 Tramonto Drive.

I have strong concerns regarding the severe, long-term and irreversible damage that will be done to the environment regarding this proposed project; therefore I request that a full EIR address my particular set of concerns as follows:

First and foremost, several years ago my wife was diagnosed with Lupus, a potentially life-threatening neurological disease, for which there is no cure. Since factors such as noise, stress, and toxic air pollutants worsen her condition, her doctor advised us to move away from our crowded neighborhood to a quieter area with less commotion, and toxic air pollution. After careful research, we chose the Pacific Palisades area, where we now reside, due to its less stressful environment, and cleaner air quality. I am appalled at the fact that this developer plans to undertake such a mammoth project, that will involve years of heavy construction and involve the use of potentially hazardous materials, only a few feet from my bedroom windows!

Although my wife has not had any dangerous Lupus flares from toxic exposure over the years we have lived here, due in large part to the neighborhood's peaceful nature, and the less toxic beach air, she continues to struggle to maintain her health. However, the possibility of years of loud noise, heavy construction, along with the ensuing toxic pollutants such as mold, asbestos, formaldehyde and other volatile organic compounds (VOC'S), that will inevitably be a byproduct of this project, will most certainly jeopardize the condition of her already fragile health. My wife has also been warned about the impact upon her medical condition of other common byproducts of major construction sites, including airborne mold spores, and lead and mercury vapors. Therefore, I ask that these environmental issues be addressed to the fullest possible extent in the EIR by independent medical examiners, not sidestepped by a mitigated environmental report that does not take these potential health hazards into consideration.

EPA Says Toxic Chemicals Pose Added Cancer Risk

Health for millions of Americans may be threatened by California, the agency says. Current levels of acceptable levels could show...

MARILYN S. GREER

WASHINGTON

The Environmental Protection Agency says that the health of millions of Americans may be threatened by California, the agency says. Current levels of acceptable levels could show...

...that more than 20 million Americans face a real risk of lung cancer from developing cancer from the pollutants...

This study is the first to show that the average cancer risk from the pollutants...

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That is a very powerful tool. It can help show us where we can get the most bang for the buck.

Bill Weisum, an EPA attorney

WASHINGTON

The Environmental Protection Agency says that the health of millions of Americans may be threatened by California, the agency says. Current levels of acceptable levels could show...

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FREE BUZZ... LAMPSON

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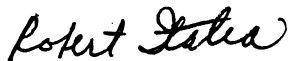
...that more than 20 million Americans face a real risk of lung cancer from developing cancer from the pollutants...

Secondly, there already exists a severe traffic problem in our area, especially around the intersection of Sunset Boulevard and Pacific Coast Highway. Many commuters come over Malibu Canyon Road and Topanga Canyon Boulevard on their way to work from the San Fernando Valley. Not a single week goes by where there aren't at least one or two serious auto accidents within a two mile radius of this intersection, due to heavy traffic congestion. These thoroughfares are already too overcrowded, posing all types of driving hazards that are long overdue in being addressed. The rising rate of traffic congestion, and traffic accidents involving serious injury over the last 12 months, demonstrates that adding just one more car to these already overcrowded roads, let alone the large numbers of cars the proposed project will bring, poses serious safety risks to all local residents for years to come. Therefore, I request that a traffic study in the EIR address the heavy congestion and hazardous driving conditions such as large increase in traffic will bring to our area roads.

Third, the unstable nature of the hill below our building where the project is to be built is another concern. The hill below our building, and below the Revello area, has a history of earth movement. The 1967 slide caused residents to be evacuated, and Tramonto Drive was temporarily closed. Six years ago, construction of a home above me caused a landslide into my end of our building, which necessitated the building of a retaining wall, and the 1994 earthquake caused further damage to the hill. Since the builders of the proposed project plan to move 100,000 cubic feet of dirt, I am concerned that the hill may not be stable enough to withstand this huge amount of soil movement. I request that the EIR include a soil study, a study on the stability of the hill and a plan to compensate area residents who may be impacted by the potential land movement if the project is built.

Thank you for addressing my concerns.

Sincerely,

A handwritten signature in cursive script that reads "Robert Italia".

Robert Italia

June 11, 2002

Maya E. Zaitzevsky,
Project Coordinator
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, California 90012

RECEIVED
CITY OF LOS ANGELES
JUN 13 2002
ENVIRONMENTAL
UNIT

RE: EAF NO: ENV-2000-2696-EIR
Project Name: Palisades Landmark Condominium Project

Dear Ms. Zaitzevsky,

I am writing in response to your Pre-Draft Request For Comments dated May 16, 2002, regarding the above referenced project. Previously, on October 22, 2000, I submitted a letter of protest (attached) to Mr. Con Howe of your department regarding the Proposed Mitigated Negative Declaration filed by Palisades Landmark, LLC and the comments detailed in that letter are incorporated herein by reference. I am a resident of the Ocean Woods Terrace (OWT) condominiums located at 17337 Tramonto Drive.

In addition to my concerns detailed in my letter of October 22, 2000, I would like to file additional pre-draft comments in a number of areas as follows:

I. Project Overview:

This project proposes to demolish 20 apartment units in two buildings and construct 82 three and four level condominiums with 205 parking spaces on 3.98 acres of hillside terrain. The project will require removal of approximately 100,000 cubic yards of soil and the import of 75,000 cubic yards of soil. Twenty-nine non-native trees are proposed to be removed. The project is subject to the Mello Act Interim Ordinance, pursuant to the Mello Act.

II. Environmental Impact:

A. Geology and Soils: My primary concern is with the size and scope of such a project for a variety of reasons. Firstly, the project is on a slope that is known to be unstable, as the current slide is active and moving. The two buildings of apartment units slated to be demolished was once a three building complex, the third building sliding down the slope in May of 1965 (see attached pictures). I am skeptical about the stability of the slope to sustain an eighty-two unit condominium complex. Secondly, I am concerned for the safety of the buildings below the proposed complex, including the extremely busy intersection of Pacific Coast Highway and Sunset Boulevard. Thirdly, I am concerned about the stability of the complex in which I reside (17337 Tramonto Drive) as slides, erosion, and movement has occurred in and around this development. Removal of 100,000 cubic yards of soil could easily exacerbate this problem. Fourthly, I am concerned for the stability and safety of the houses along Revello Drive and the adjoining streets that could be impacted by this project as they are along the hillside overlooking the site to be developed. I would expect that the City of Los Angeles, or any other public agency, would not participate financially in the stabilization of the land required for the development of this project.

- B. **Aesthetics:** At the June 13, 2002 meeting of the Pacific Palisades Community Council, Mr. Ken Kahan, General Partner of Palisades Landmark, LLC presented artists renderings of the proposed eighty-two unit development. Although very beautiful, his "architecture of Europe, terracing up the hill", more specifically an Italian villa motif, hardly fits the aesthetics of the hillsides of western Pacific Palisades. It may fit the scheme of the Palisades Highlands, but does not at all match the architecture of the Castallemare section of Pacific Palisades. This Italian villa architecture would "stick out" when viewed from above and from Pacific Coast Highway. The massive size and height of three and four story buildings hardly fit the motif of the hillside. I request that you require a motif and size and height of the buildings more consistent with the Pacific Palisades environment in which this development is proposed to be build.
- C. **Land Use and Planning:** My primary objection to the land use and planning of this development is the placement of eighty-two condominium units and parking for 205 automobiles upon slightly under four acres. Also, according to the plans enclosed with your Pre-Draft Request for Comments, the sole access to this development will be the existing two-lane driveway, which by easement is also shared by the thirty-six units of OWT. This limited access will cause a bottleneck through the driveway and onto Tramonto Drive. I am also concerned that this limited access by 118 units (82 + 36) is not adequate in case of the need for emergency exit. Thirdly, the plans also show that the northern row of buildings will be placed right at the property line shared with OWT. Thus, a three-story building will be erected right outside our rear windows and balconies having negative impact upon our privacy and obstructing our white-water views of the ocean. I would request that a view analysis from the southern-most units of OWT be performed as part of the Environment Impact Report.
- D. **Noise:** I am concerned for the health and safety of several senior citizens that live in OWT. The dust, dirt, and noise that will be created by the movement of 175,000 cubic yards of soil and the construction of eighty-two condominium units that will take from six months to more than one year to complete could have devastating impact upon these residents. I would certainly hope that time restrictions are placed upon the developer so not to negatively impact the life style of the residents of OWT. This project proposes 205 parking spaces. The noise and noxious exhaust from this large volume of cars will emit directly into the 12 condominium units of OWT that directly face the proposed project. This problem is exacerbated as the current plan puts these buildings approximately fifty feet closer to OWT than the current apartment building. This is an unhealthful condition.
- E. **Population and Housing:** At the June 13, 2002 meeting of the Pacific Palisades Community Council, Mr. Ken Kahan of Palisades Landmark stated that he was familiar with the Mello Act, however Landmark had no plans to build affordable housing or provide alternatives for the current apartment residents, many of which are senior citizens and have been living in their apartments for twenty to thirty years. These long-time Pacific Palisades residents must be accommodated in an acceptable manner.

F. Transportation/Traffic: Of utmost concern is the ability of curvy, steep, two-lane Tramonto Drive to sustain traffic generated by an 82-unit condominium complex both during construction and on an ongoing basis. Tramonto Drive is the sole egress route for 210 houses in the Castallemare section as well as the 36 units of OWT. It is the only access for emergency vehicles for much of the area. This road has not been serviced by the City of Los Angeles for several years. Under the current plan, this road will be the sole access for all construction vehicles for the project. I would want to see an evaluation that Tramonto Drive is physically and structurally capable of sustaining the weight and volume of construction vehicles required for this project. The Palisades Community Council estimated a minimum of 1,000 trips on Tramonto and Los Liones for the construction of this project. This road is not in a condition to sustain the weight and usage of heavy construction vehicles. Local residents will sustain long delays for the entire construction period. Post construction, single lane Tramonto will be subject to the traffic generated by an additional sixty-two residences (82 condos – 20 existing apartments). Obviously, 2,400 sq. ft. – 3,000 sq. ft. condos will generate much more traffic per unit than the existing two-bedroom apartments that are largely occupied by senior citizens. This traffic problem will place an additional burden on the intersection of Los Liones and Sunset. Currently, making a left turn from Los Liones to Sunset is hazardous and results in long delays during peak traffic periods. Several traffic accidents have already occurred at this intersection. Lastly, the traffic generated by the additional units will place a greater strain on Pacific Coast Highway that is already over-burdened during the morning and evening commute periods, and on weekends. The development of a 21-unit condominium at 17325 Castallemare must also be factored into this equation.

III. Conflicts with the Brentwood-Pacific Palisades Community Plan

The Brentwood-Pacific Palisades Community Plan (excerpt attached) was developed through a lengthy process of community involvement (State Code 65351) to determine community issues and formulating land use policies and objectives. As stated on page II-1, “The General Plan is the fundamental policy document of the City of Los Angeles. It defines the framework by which the City’s physical and economic resources are to be managed and utilized over time. Decisions by the City with regard to the use of its land, design and character of buildings and open spaces, conservation of existing and provision of new housing, provision of supporting infrastructure and public and human services, protection of environmental resources, protection of residents from natural and man-caused hazards are guided by the Plan”. And as stated on Page III-3 of the Plan, “With the implementation of the Community Plan, all zone changes, subdivisions, parcel maps, variances, conditional uses, specific plans, community and neighborhood residential projects shall provide for Plan consistency.” By law, the proposed Palisades Landmark Project must comply with the provisions of the Plan. It is my opinion that the proposed project violates the Brentwood-Pacific Palisades Community Plan in the following aspects:

A. Residential Issues (Page I-2):

1. "Need to minimize grading, limit land use intensity, and preserve natural topography in hillside areas".
2. "Need to protect environmentally sensitive areas, scenic views and scenic corridors".
3. "Need to restrict building on geologically sensitive areas".
4. "Need to improve the visual environment through the development of appropriate design criteria and controls".
5. "Limiting residential development on hillsides having more than a 15% slope".
6. "New hillside building may block view or present an unsightly view from below".
7. "Lack of affordable housing".

B. Land Use Policies and Programs (Page III-1):

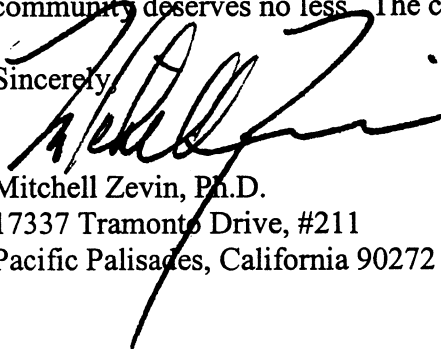
1. Objective 1-1 - "The average net density for all housing types is eight units per acre". The proposed development of 82 units on four acres, or approximately 20.5 units per acre is certainly not in keeping with the plan. Further, the Plan provides a formula for Slope Density Standards (Page III-2), or $D = (50 - S) / 35$. It is not mathematically possible for 82 units to satisfy the terms of the formula.
2. "Density transfer shall be allowed in areas designated minimum density category as long as the total number of dwelling units indicated in any development is not increased and adequate access is available from two or more directions". May I remind you that the plan for the proposed development includes only one access road?
3. Objective 1-2.4 - "A decision-maker shall adopt a finding which addresses the availability of infrastructure as part of any decision relating to an increase in permitted residential density". I would expect this to occur and the "decision-maker" identified.
4. Objective 1-3.1 - "Seek a higher degree of architectural compatibility and landscaping for new development to protect the character and scale of existing residential neighborhoods". Italian?
5. Objective 1-3.2 - "Preserve existing views in hillside areas".
6. Objective 1-3.3 - "Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed".
7. Objective 4.1 - "Development of the Coastal Zone is subject to the provisions of the California Coastal Act".
8. Objective 5.1.1 - "Permitted development shall be sited and designed to protect views to the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible to restore and enhance visual quality in the visually degraded areas".
9. Objective 5.12 - "... Grading, cutting and filling in canyons and arroyos on hillsides should be minimized, where such operations significantly alter the appearance of natural landforms".
10. Objective 16-1.1 - "The City should establish residential neighborhood traffic and parking management plans as appropriate".

IV. Other Concerns

- A. **Loss of Ocean View:** The residents of the 12 southern units of OWT (including myself) purchased their property largely because of the white water ocean view available from these units. The current plan will most likely block this view for at least two of the three floors of OWT. As Mr. Kahan stated, "the view will be partially, but not completely destroyed". This loss will result in a decrease of property value of hundreds of thousands of dollars per unit. The developer must compensate the residents of OWT for this loss. Public views along Revello Drive and upper Tramonto Drive most likely will also be blocked by this project.
- B. **Financial Viability of Developer:** A project of this magnitude will cost millions of dollars to construct. Further, there is potential liability if construction of the project results in damage to the residences, condominiums, and streets above and below the project. Mr. Kahan filed a Proposed Mitigated Negative Declaration in 2000, stating over and over again that this project, "will have no impact, or less than significant impact as the mitigation measures will reduce any potential significant adverse effects to a level of insignificance." The issues detailed in this letter are far from "insignificant" to the impacted residents of western Pacific Palisades. Mr. Kahan admitted at the Palisades Community Council meeting that he has no previous experience of building on a hillside. At the same meeting, Mr. Jerome Nash, acknowledged as a 50% limited partner of Palisades Landmark, LLC by Mr. Kahan, stated he had no knowledge of an 82-unit development. He claimed Mr. Kahan's original plan was only to build on the vacant lot where the third apartment building once stood. Mr. Kahan and Mr. Nash made threats of litigation in front of approximately fifty Pacific Palisades residents attending this meeting. Given these facts, I would say this is a rather risky proposition. As several projects have been begun and left partially completed and abandoned in this area, I would propose that Palisades Landmark, LLC be required to post a sizeable bond to mitigate the financial impact of the possible occurrence of any of the above detailed factors. Having this project halted for whatever reason after the demolition of the existing apartments would have devastating impact on citizens of Pacific Palisades as would damage to any of the adjacent properties.

I request that the Environmental Impact Report address each comment that has been raised in this letter and that every aspect of code, plan, and law be followed in the consideration of this venture. The community deserves no less. The courtesy of your response is expected at the address below.

Sincerely,



Mitchell Zevin, Ph.D.
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Pacific Palisades, California 90272

Cc: Cindy Miscikowski
Councilwoman, 11th District
Attn: S. Kristen Montet, Planning Deputy

Peter M. Well
President, Los Angeles Planning Commission