

HILDEGARDE HEIDT  
WILLIAM IMHOFF  
17433 REVELLO DRIVE  
PACIFIC PALISADES, CA 90272  
(310) 573-1946

MARCH 30, 2003

MAYA ZAITZEVSKY, PROJECT CO-ORDINATOR  
200 NORTH SPRING STREET, ROOM 763  
LOS ANGELES, CA 90012

RE: COMMENTS ON THE DRAFT EIR FOR THE PROPOSED  
PALISADES LANDMARK CONDOMINIUM PROJECT  
EAF NO.: ENV-200-2696-EIR  
SCH NO.: 2002051086

**RECEIVED**  
CITY OF LOS ANGELES

APR 02 2003

ENVIRONMENTAL  
UNIT

DEAR Ms. ZAITZEVSKY,

WE WISH TO SUBMIT THE FOLLOWING COMMENTS IN RESPONSE TO THE JANUARY 16, 2003 DRAFT ENVIRONMENTAL IMPACT REPORT ("DRAFT EIR"), WHICH HAS BEEN SUBMITTED BY THE PALISADES LANDMARK CONDOMINIUM PROJECT. WE WILL LIMIT OUR COMMENTS TO SOME OF THE REPORT'S MOST CRITICAL FLAWS AND AREAS OF CONTROVERSY AND CONCLUDE WITH AN ALTERNATIVE PROPOSAL TO THE PROPOSED PROJECT'S.

THIS DRAFT EIR FAILS TO PROVIDE ADEQUATE OR COMPLETE ANALYSIS OF THE PROPOSED PROJECTS IMPACTS. THE MITIGATION MEASURES PROPOSED FOR SIGNIFIGANT IMPACTS ARE EITHER OF LITTLE SUBSTANCE OR HAVE THE POTENTIAL OF CREATING ADDITIONAL ADVERSE IMPACTS BEYOND THOSE THEY ARE ATTEMPTING TO MITIGATE. THE MOST SERIOUS FLAW OF THE REPORT IS THE FAILURE TO PROVIDE A REASONABLE ALTERNATIVE TO THE PROPOSED PROJECT THAT WILL SIGNIFICANTLY MITIGATE THE PROJECT'S IMPACTS.

**PROJECT DESCRIPTION**

THE DRAFT EIR IS INACCURATE IN ITS DESCRIPTION OF THE PROJECT AS SIX SEPARATE BUILDINGS OF LESS THAN 45 FEET IN HEIGHT. WE ESTIMATE THE PROPOSED PROJECT TO BE A SINGLE CONTINUOUS STRUCTURE 70 FEET IN HEIGHT AND APPROXIMATELY 750 FEET IN LENGTH. SEE CROSS-SECTIONS: A. FIGURE III 4, B. FIGURE III 5, C. FIGURE III 6, MAP FIGURE III-2, AND FIGURE I.V. B-18.

**VISUAL RESOURCES**

THE EIR IS INACCURATE IN ITS ASSESSMENT OF THE VISUAL RESOURCES OF THE PROPOSED PROJECT SITE AND FAILS TO ADEQUATELY MITIGATE IMPACTS TO THE HILLSIDE VIEWSHED.

Handwritten bracket on the right side of the page, grouping the three main paragraphs of the letter. The bracket is labeled with the numbers 1, 2, and 3, corresponding to the three paragraphs.

THE PROPOSED PROJECT WILL ELIMINATE 29 TREES AND THE GREENBELT OF THE REVELLO SLIDE AREA BY REPLACING IT WITH A MASSIVE STRUCTURE THAT FAR EXCEEDS THE SCALE OF ANY OTHER STRUCTURE IN THE AREA. ALTHOUGH THE DRAFT EIR IDENTIFIES THIS MASSING OF CONSTRUCTION AS A POTENTIALLY SIGNIFICANT IMPACT IT FAILS TO ADEQUATELY DETAIL HOW IT WILL BE MITIGATED. BASED ON THE CITY OF LOS ANGELES CEQA THRESHOLD GUIDE, WE BELIEVE THAT THE PROPOSED PROJECT WOULD RESULT IN SIGNIFICANT AESTHETIC IMPACTS BY EXCEEDING ALL NINE OF THE POINTS LISTED ON IV.B.VISUAL RESOURCES, PAGE 87 OF THE DRAFT EIR. THE DRAFT EIR'S FAILURE TO IDENTIFY THESE IMPACTS LEADS US TO CONCLUDE THAT IT IS INACCURATE IN ITS ASSESSMENT OF THE HILLSIDE'S AESTHETIC VALUES.

3

ALTHOUGH THE IMAGE OF THE PROJECT ON FIGURE IV.B-18 CLEARLY ILLUSTRATES THE MASSIVENESS OF THE PROJECT, THIS PHOTO IS MIS-IDENTIFIED AS TAKEN FROM PACIFIC COAST HIGHWAY (PCH). IN FACT THE VIEW FROM NORTHBOUND PCH IS APPROXIMATELY 100 YARDS AWAY AND IT WOULD PROVIDE A MORE DISTURBING PERSPECTIVE AS TO THE IMPACT OF THIS PROJECT ON THE HILLSIDE VIEWSHED. IF ONE WERE TO TRAVEL NORTH ON PCH WHILE APPROACHING SUNSET BLVD THE THIN STRIP OF VEGETATION BELOW THE PROJECT WOULD BE ECLYPSED BY THE LARGE COMMERCIAL BUILDINGS IN THE FOREGROUND AND THE ROOF LINE OF THE TOP OF THE PROPOSED PROJECT WOULD APPEAR AS THE CREST OF THE HILL. THE RESULTING CUMULATIVE IMPACTS OF DEVELOPMENT TO THIS VIEWSHED WILL BE OF MONOLITHIC DEVELOPMENT FROM PCH AND SUNSET BLVD TO THE CREST OF THE HILL.

4

OVER THE PAST DECADES MUCH OF THE NATURAL BEAUTY, THAT WAS ONCE PART OF THE INTER-SECTION OF SUNSET BLVD CANYON AND THE PACIFIC COAST HIGHWAY, HAS BEEN LOST TO DEVELOPMENT. THE DRAFT EIR ASSUMES THAT EXISTING DEVELOPMENT AND USES IN THE AREA EXEMPT THE PROPOSED PROJECT FROM ANY RESPONSIBILITY TO CONSERVE THE NATURAL HILLSIDE ABOVE THIS HISTORIC INTER-SECTION.

5

THE PROPOSED PROJECT WILL SIGNIFICANTLY IMPACT THE HILLSIDE VIEWSHED AS SEEN FROM PCH AND STATE BEACH. CHAPTER 3 OF THE COASTAL ACT (SECTIONS 30200-30256.5) IN PART REQUIRES THAT NEW DEVELOPMENT PROVIDE FOR THE PROTECTION OF THE SCENIC AND VISUAL QUALITIES OF COASTAL AREAS. SEE EIR DRAFT IV.F. LAND USE PAGE 171. ALTHOUGH THE DRAFT EIR CONSIDERS BUILDING MASSING TO BE A POTENTIALLY SIGNIFICANT IMPACT, THE ONLY MITIGATION SUGGESTED WAS LANDSCAPING. NO DETAILED LANDSCAPING PLAN HAS BEEN PROVIDED. THE LANDSCAPING SUGGESTED IN THE ARTIST RENDERING OF THE PROJECT (FIGURE IV, B-18) IS NOT PROBABLE SINCE ONE CANNOT REASONABLY EXPECT CONDOMINIUM OWNERS TO ALLOW THEIR OCEAN VIEWS TO BE INTENTIONALLY BLOCKED.

6

AIR QUALITY

THE DRAFT EIR'S METHODOLOGY FOR DETERMINING PARTICULATE (PM10) EMISSIONS FROM CONSTRUCTION ACTIVITY, SOIL DISTURBANCE AND FROM EQUIPMENT OPERATIONS IS FLAWED SINCE IT IS BASED ON TABLE FORMULAS RATHER THAN SITE SPECIFIC DATA AND PREVAILING LOCAL CONDITIONS.

7

FIRST, WE BELIEVE THAT THE DRAFT EIR IS INACCURATE IN STATING THAT SITE DISTURBANCE WILL BE LIMITED TO 50% OF THE PROJECT PROPERTY (SEE MAP FIGURE III-1).

7

SECOND, THE DRAFT EIR'S USE OF SCAQMD CEQA HANDBOOK FACTORS TO DETERMINE (PM10) AIR QUALITY IMPACTS IS INADEQUATE AND INACCURATE BECAUSE IT IS BASED ON A HYPOTHETICAL FORMULA RATHER THAN THE PREVAILING CONDITIONS AND MATERIALS SPECIFIC TO THE SITE. THE PROPOSED PROJECT REQUIRES THE REMOVAL OF MORE THAN 100,000 CUBIC YARDS OF EARTH (APPROXIMATELY 256 TRIP PER DAY UP TO SIX DAYS PER WEEK FOR THREE MONTHS AND THEN THE PROCESS MUST BE REPEATED IN REVERSE BY IMPORTING 75,000 CU YDS OF EARTH. THE ASSUMPTION, THAT ON A DAILY BASIS, APPROXIMATELY 2,666,000 POUNDS OF DIRT CAN BE EXCAVATED, LIFTED AND THEN DUMPED INTO WAITING TRUCKS, AND THAT ONLY 52 POUNDS OF PARTICULATE MATTER WILL BE CARRIED INTO THE COMMUNITY, IS NOT CREDIBLE. THE REALITY IS THAT THE ALMOST CONSTANT DAILY OFFSHORE BREEZE ALONG THIS AREA WILL CARRY A MUCH GREATER AMOUNT OF DUST AND POLLUTION OVER A LARGE PORTION OF OUR COMMUNITY. A STANDARD HANDBOOK FACTORING TABLE IS AN INADEQUATE MEANS FOR ACCURTELY DETERMING AIR QUALITY IMPACTS ON THIS SITE.

8

FINALLY, THE DRAFT EIR STATES, THAT ALTHOUGH THERE WOULD BE ADVERSE IMPACTS ON PROPERTY, THAT THIS "...IS NOT A SIGNIFICANT IMPACT BECAUSE THE EMISSIONS MAGNITUDE IS LESS THAN SCAQMD THRESHOLD LEVELS, AND THE HEALTH IMPACT OF SOIL DUST IS MUCH LESS THAN FROM COMPLEX CHEMICAL SPECIES FOUND IN URBAN ATMOSHPERES \*(IV.C. AIR QUALITY, PAGE 115). THIS COMMENT IS DOUBLY OFFENSIVE BECAUSE IT ATTEMPTS TO UNDERSTATE A POTENTIAL POLLUTION IMPACT ON OUR COMMUNITY BY IMPLYING THAT THE ATMOSPHERE OF OUR COASTAL AREA IS ALREADY A COMPLEX CHEMICALLY POLLUTED ENVIROMENT. THE DRAFT EIR'S PROPOSED MITIGATION MEASURES OF WETTING THE SOIL TWICE DAILY AND COVERING THE EARTH IN TRANSPORT TRUCKS ARE CLEARLY INADEQUATE.

9

**GEOLOGY AND SOILS**

THE DRAFT EIR DOES NOT PROVIDE ADEQUATE ANALYSIS OF THE PROPOSED PROJECT'S GEOLOGY AND CONSEQUENTLY DOES NOT PROVIDE A SPECIFIC ENGINEERING PLAN TO STABILIZE THE HILLSIDE. THE IMPACT OF KNOWN GROUND WATER ON THE DESIGN AND CONSTRUCTION OF THE PROJECT HAS NOT BEEN ANALYZED.

10

THE DRAFT EIR SUGGESTS THE POSSIBLE USE OF TIE-BACKS TO ASSIST SOLDIER PILES, WHICH WOULD REQUIRE DRILLING UNDER NEIGHBORING PROPERTY. THE ACTUAL NUMBER OF TIE-BACKS AND THEIR REQUIRED DEPTH CANNOT NOT BE DETERMINED PRIOR TO EXCAVATION OF THE SITE. NONE OF THE NEIGHBORING PROPERTY OWNERS HAVE AGREED TO SUCH A PROPOSAL AND IT IS UNLIKELY THAT THEY WOULD CHOOSE TO INVOLVE THEMSELVES WITH A POTENTIAL LIABILITY FOR THE FAILURE OF THE PROPOSED PROJECT'S ENGINEERING SCHEME. LIKewise, WE HOPE THAT THE CITY OF LOS ANGELES WILL ACT IN A PRUDENT MANNER.

11

NOISE

THE DRAFT EIR ACKNOWLEDGES THAT THERE WILL BE SIGNIFICANT IMPACTS OF NOISE DURING THE PROJECT'S THREE-YEAR CONSTRUCTION PERIOD, BASED ON AN ANALYSIS OF ASSUMED NOISE LEVELS. THE BASIS OF THESE ASSUMPTIONS WAS NOT GIVEN, NOR WAS ANY DATA SPECIFIC TO THE SITE PROVIDED.

} 12

THE DRAFT EIR ASSUMES THAT BASELINE NOISE LEVELS WILL DOUBLE DURING DAYTIME CONSTRUCTION AND THAT THIS IMPACT WILL BE SIGNIFICANT AND UNMITIGATABLE. THE DRAFT EIR ESTIMATES AN IMPACT PERIOD OF SIX MONTHS DURATION POSSIBLY FOR 10 TO 11 HOURS PER DAY, SIX DAYS PER WEEK, EFFECTING RESIDENTS MORE THAN 1/2 MILE AWAY FROM THE CONSTRUCTION SITE WITH SIGNIFICANT NOISE IMPACTS. YET, THE REPORT CONCLUDES THAT THESE IMPACTS ARE CONSIDERED SMALL RELATIVE TO THE PROJECT 3-YEAR CONSTRUCTION SCHEDULE. WHAT IS THE RELEVANCE OF SUCH A STATEMENT?

} 13

THE DURATION OF CONSTRUCTION TIME FOR THIS PROJECT NEEDS TO BE LIMITED AND NOT MERELY MITIGATED BY THE LIMITING OF DAILY HOURS OF CONSTRUCTION.

} 14

FIRE PROTECTION

THE DRAFT EIR IS INADEQUATE IN ITS ASSESSMENT OF CUMULATIVE FIRE RISKS TO THE PROPOSED SITE. THE AUTOMATIC FIRE SPRINKLERS EXEMPTION SHOULD NOT BE ALLOWED.

THE PROJECT SITE IS IDENTIFIED TO BE WITHIN A MODERATE FIRE HAZARD SEVERITY ZONE AND THE MOUNTAIN FIRE DISTRICT. THE SITE IS SUBJECT TO SEASONALLY EXACERBATED FIRE HAZARD LEVELS, WHICH IN ADDITION TO SLOPE STEEPNESS CAN GREATLY ACCELERATE THE SPEED OF FIRE SPREAD. UNDER THESE CONDITIONS ACCESSIBILITY BECOMES CRITICAL. THE FACT THAT THE SITE IS ISOLATED FROM DIRECT ACCESS VIA ADJACENT PUBLIC STREETS FURTHER COMPLICATES FIRE SURPRESSION. A SUBDIVISION OF THIS DENSITY WITH A 300 YARD LONG DEAD ENDING STREET SHOULD END IN A CUL-DE-SAC NOT A THREE POINT TURN AS SHOWN ON FIII-1 OF THE DRAFT EIR.

} 15

CONSIDERING THE CUMULATIVE FIRE RISKS AT THE PROPOSED PROJECT SITE WHICH INCLUDE LIMITED ACCESSIBILITY, SEASONALLY ELEVATED FIRE HAZARD LEVELS AND THE DENSITY OF COMBUSTIBLE FUELS WITHIN THE STRUCTURE, AUTOMATIC FIRE SPRINKLERS SHOULD BE REQUIRED THROUGHOUT THIS PROJECT WITHOUT EXEMPTION. AUTOMATIC FIRE SPRINKLERS ARE THE MOST SIGNIFICANT MITIGATING MEASURE THAT COULD BE IMPLIMENTED TO PROTECT LIFE AND PROPERTY. THIS PROJECT SHOULD NOT BE EXEMPTED BASED ON TABLE IV.1-2 PAGE 204 OF THE DRAFT EIR WHICH DOES NOT TAKE INTO CONSIDERATION THE PREVAILING ENVIRONMENT, SLOPE, AND ACCESSIBILITY OF THE PROJECT SITE. NOR DOES IT CONSIDER THAT UNDER ADVERSE CONDITIONS WHEN OUR LOCAL FIRE ENGINE COMPANY IS AWAY, AN AUTOMATIC SPRINKLER SYSTEM MAY BE THE ONLY FIRE SURPRESSION AVAILABLE FOR A CONSIDERABLE PERIOD OF TIME.

TRAFFIC

THE DRAFT EIR'S ASSESSMENT OF TRAFFIC FLOW IS FLAWED AND ITS PROPOSED MITIGATING MEASURES MAY RESULT IN ADDITIONAL TRAFFIC IMPACTS THAT HAVE NOT BEEN ADEQUATELY ANALYZED.

} 16

THE REPORT IDENTIFIES LOS LIONES AS A "COLLECTOR STREET" WITH THE PRINCIPLE FUNCTION OF ASSEMBLING TRAFFIC FROM THE INTERIOR AND DELIVERING IT TO THE CLOSEST ARTERIAL. AT THIS POINT IN TIME LOS LIONES FUNCTIONS AS A CONNECTOR STREET BETWEEN TRAMONTO DRIVE AND SUNSET BLVD. TRAMONTO DRIVE IS THE COLLECTOR STREET, WHICH GATHERS ALL OF THE OTHER STREETS ON TOP OF CASTELLEMARE MESA, AND FEEDS THEM DOWN TO SUNSET BLVD VIA LOS LIONES. THE REPORT FAILS TO IDENTIFY TRAMONTO DRIVES FUNCTIONS AS A COLLECTOR STREET AND THE FACT THAT IT IS NOT... " WIDER THAN TYPICAL RESIDENTIAL STREETS", WHICH WOULD BETTER ENABLE IT TO HANDLE THE ADDITIONAL HIGH VOLUME OF TRAFFIC THAT WILL BE INTRODUCED VIA THE PROJECT'S DRIVEWAY (IV.J.TRAFFIC PAGE 241).

16

THE DRAFT EIR'S IDEA OF MITIGATING TRAFFIC HAZARD IMPACT BY INTRODUCING A 3-WAY STOP ON TRAMONTO DRIVE AT THE PROJECT DRIVEWAY HAS NOT BEEN ANALYZED AS TO IT EFFECT ON THE TRAFFIC FLOW OF TRAMONTO DRIVE WHICH IS A COLLECTOR STREET.

17

ALTERNATIVE TO THE PROPOSED PROJECT

THE DRAFT EIR HAS FAILED TO MEET CEQA GUIDELINE REQUIREMENTS BY DESCRIBING A FEASIBLE ALTERNATIVE TO THE PROJECT, WHICH WOULD SUBSTANTIALLY LESSEN THE SIGNIFICANT EFFECTS OF THE PROJECT.

18

WE BELIEVE THAT A MORE THOROUGH ANALYSIS OF THE PROPOSED PROJECT WILL REVEAL THAT ITS SCALE AND DENSITY ALONG WITH THE ATTEMPT TO STABILIZE THE REVELLO SLIDE AREA ARE THE BASIS FOR ALL OF THE SIGNIFICANT ENVIROMENTAL IMPACTS. BY ELIMINATING THE EXPENSE OF STABILIZING THE REVELLO SLIDE AND LIMITING THE OVERALL SIZE OF THE DEVELOPMENT TO THE AREA OF THE EXISTING UNITS ON THE PROPERTY, MOST OF THE CONCERNS OF THE COMMUNITY WOULD BE MITIGATED. A DENSITY INCREASE OF 50% ALONG WITH REDUCED DEVELOPMENT COST WOULD PROVIDE A REASONABLE FINANCIAL RETURN TO THE DEVELOPER. WE PROPOSE THAT THE FOLLOWING ALTERNATIVE WOULD ACHIEVE THESE OBJECTIVES.

30-UNIT TOWNHOUSE ALTERNATIVE

UNDER THIS ALTERNATIVE, THE PROJECT WOULD CONSIST OF 30 TOWNHOUSES. THE NEW SITE PLAN WOULD NOT ATTEMPT TO STABILIZE THE SLIDE AREA. THE PROPOSED PROJECT'S MIDDLE AND WEST END TOWNHOUSE UNITS WOULD BE ELIMINATED, AS WOULD THE WEST UNIT OF FLATS. A SURFACE ROAD WOULD ACCESS TEN UP SLOPE TOWNHOUSE AT THE APPROXIMATE SITE OF THE PROPOSED PROJECT'S EAST END TOWNHOUSE UNIT. THE SAME SURFACE ROAD WOULD ACCESS THE SOUTHERLY (DOWNSLOPE) UNITS CONSISTING OF 20 TOWNHOUSES. UNLIKE THE OTHER PROPOSED ALTERNATIVES, THIS ALTERNATIVE WOULD ELIMINATE THE NEED TO REPAIR THE SLIDE AREA ALONG WITH THE SIGNIFICANT IMPACTS ATTENDANT TO EXPORT OF 100,000 CUBIC YARDS AND THE IMPORT OF 75,000 CU YDS OF EARTH.

19

**VISUAL RESOURCES**

THIS ALTERNATIVE WOULD REDUCE THE OVERALL SIZE OF THE PROPOSED PROJECT. THE SLIDE AREA WOULD BE PRESERVED AS A NATURAL GREENBELT. THIS ALTERNATIVE WOULD OCCUPY ESSENTIALLY THE SAME AREA AS THE EXISTING UNITS WITH A 50% INCREASE IN DENSITY. THIS ALTERNATIVE'S IMPACT ON AESTHETICS WOULD BE SIGNIFICANTLY LESS THAN THE PROPOSED PROJECT.

20

**AIR QUALITY**

SHORT-TERM AIR QUALITY IMPACTS DURING GRADING AND CONSTRUCTION WOULD BE LESS UNDER THIS ALTERNATIVE BECAUSE THE LANDSLIDE AREA WOULD NOT NEED STABILIZATION FOR THIS PROJECT AND IT WOULD REQUIRE LESS OVERALL CONSTRUCTION AND RESIDENTIAL USES. LONG-TERM OPERATIONAL AIR QUALITY IMPACTS FROM STATIONARY EMISSIONS WOULD BE LESS UNDER THIS ALTERNATIVE COMPARED TO THE PROPOSED PROJECT. THIS ALTERNATIVE INVOLVES FEWER RESIDENTIAL UNITS, RESULTING IN LESS NATURAL GAS AND ELECTRICITY CONSUMPTION AND ASSOCIATED AIR POLLUTION THAN THE PROPOSED PROJECT. THIS ALTERNATIVE WOULD ALSO GENERATE FEWER VEHICLE TRIPS THAN THE PROPOSED PROJECT AND THEREFORE LESS LONG-TERM AUTOMOBILE RELATED AIR POLLUTANT EMISSIONS.

21

**GEOLOGY AND SOILS**

THE AMOUNT OF GRADING SPECIFICALLY ASSOCIATED WITH SLOPE STABILIZATION REQUIRED FOR THE PROPOSED PROJECT WOULD BE ELIMINATED. THEREFORE ASSOCIATED IMPACTS OF THE PROPOSED PROJECT WOULD BE ELIMINATED.

22

**HYDROLOGY AND WATER QUALITY**

THIS ALTERNATIVE WITH FEWER UNITS THAN THE PROPOSED PROJECT WOULD HAVE LESS IMPERMEABLE SURFACES ON THE PROJECT SITE. THERE WOULD BE A SIGNIFIGANT REDUCTION IN RUNOFF RATES AND VELOCITIES COMPARED TO THE PROPOSED PROJECT. THEREFORE HYDROLOGY IMPACTS WOULD BE LESS THAN THOSE ASSOCIATED WITH THE PROPOSED PROJECT. WATER QUALITY IMPACTS WOULD BE SIMILAR TO THE PROPOSED PROJECT.

23

**LAND USE**

THE LAND USE OF THIS ALTERNATIVE IS CONSISTENT WITH THE ZONING AND GENERAL PLAN LAND USE DESIGNATION FOR THE PROJECT SITE. HOWEVER BECAUSE THIS ALTERNATIVE INVOLVES 52 FEWER UNITS THAN THE PROPOSED PROJECT, LAND USE IMPACTS WOULD BE LESS THAN THE PROPOSED PROJECT.

24

**NOISE**

UNDER THIS ALTERNATIVE SHORT-TERM NOISE IMPACTS DURING GRADING AND CONSTRUCTION WOULD BE DRASTICALLY REDUCED DUE TO THE FACT THAT THE STABILIZATION OF THE REVELLO SLIDE, WHICH IS A MAJOR CAUSE OF NOISE IMPACT WOULD BE ELIMINATED. THE REDUCTION IN THE NUMBER OF RESIDENTIAL UNITS WOULD ALSO SHORTEN THE LENGTH OF CONSTRUCTION TIME AND GENERATE FEWER VEHICLE TRIP PER DAY TO THE PROPOSED PROJECT. THUS, LONG TERM AUTOMOBILE-RELATED NOISE IMPACTS WOULD BE LESS THAN THE PROPOSED PROJECT.

25

THIS PROPOSED 30-TOWNHOUSE ALTERNATIVE WOULD ALSO SIGNIFICANTLY REDUCE THE IMPACTS ON:

- POPULATION AND HOUSING
- POLICE PROTECTION
- FIRE PROTECTION
- SCHOOLS
- RECREATION/PARKS
- ROAD MAINTENANCE
- TRAFFIC
- SEWERS
- WATER
- SOLID WASTE
- ELECTRICITY
- NATURAL GAS

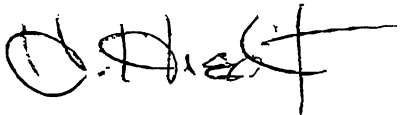
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WE BELIEVE THAT THE ENVIRONMENTAL IMPACT REPORT PROCESS IS A VERY IMPORTANT. WE ALSO RECOGNIZE THAT TO THE DEVELOPER IT REPRESENTS AN OBSTACLE, WHILE IT PROVIDES US WITH A CRUCIAL TOOL TO PRESERVE OUR ENVIRONMENT AND QUALITY OF LIFE. NATURALLY, WE UNDERSTAND THAT IN THE PROCESS OF PREPARING AN EIR, THE PREPARER MIGHT BECOME MORE FOCUSED ON FORM RATHER THAN SUBSTANCE AND THAT IN THE INTEREST OF EXPEDIENCY THAT INDIVIDUAL MIGHT RELY ON AVAILABLE DATA, WHICH COULD PROVE TO BE INADEQUATE, IRRELEVANT OR INCOMPLETE. FOR US THE TRUE IMPACTS CAN ONLY BE FOUND IN THE DETAILS, WHICH TRULY REFLECT THE SUBSTANCE OF OUR REALITY, OUR ENVIRONMENT. WE UNDERSTAND THAT THE DRAFT EIR'S PROPOSED PROJECT MAY HAVE A TREMENDOUS IMPACT ON OUR LIVES, BOTH FOR THE SHORT AND THE LONG TERM. THEREFORE, WE PRAY THAT YOU UNDERSTAND WHY WE EXPECT THAT ALL ANALYSIS PROVIDED IN THE FINAL EIR SHOULD TO BE COMPLETE AND COMPREHENSIVELY BASE ON DATA SPECIFICALLY RELEVANT TO THE PROPOSED PROJECT SITE. FAILING THIS, HOW ELSE MAY WE REACH A FAIR, INFORMED, AND INTELLIGENT DECISION ON THIS PROJECT?

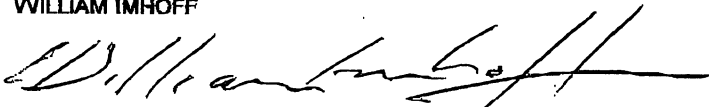
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RESPECTFULLY YOURS,

HILDEGARDE HEIDT



WILLIAM IMHOFF



- CC COUNCILWOMAN CINDY MISCIKOWSKI
- CC CASTELLAMMARE MESA HOME OWNERS
- CC PALISADES HOME OWNERS

321 Bellino Drive  
Pacific Palisades, CA 90272  
March 31, 2003

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

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APR 02 2003

ENVIRONMENTAL  
UNIT

RE: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference Nos SCH# 2002051086  
17331-17333 Tramonto Drive

Hello!

We have lived in our present home over 30 years. We are very concerned about the possible approval of the above project for a multitude of reasons. First, the geological impact to the area. As you are aware, this area has been subject to major damage due to many factors. Please consider the magnitude of this project and the possible consequences to the hillside and our residents. How reliable are the people who are proposing this project in terms of all our concerns! Obviously, their bottom line is to make money, but at what cost to everyone else. I realize one geologist may approve and have perfectly good reasons, and another will disapprove and will also have theoretically good reasons. But, please consider the facts of what has happened time and time again on this hill due to irresponsible planning and/or implementation. And that doesn't even consider the possibility of abandoned projects which we hear about much too frequently.

We are also very concerned about the increased traffic this will cause, and that's after it is finished. The 3 years it is supposed to complete is going to have significant impact on disruption and inconvenience for the whole hill. As you know, there are only 2 outlets for the folks on the hill. We have had little road maintenance during the time we live here. With the addition of this enormous project, are we to assume this will improve? Is the city going to take responsibility for additional problems created by this project?

As you can tell, our family is very concerned about the impact of this project. Please consider our concerns in your decision.

Sincerely,

*Karen Marrs Bob Marrs*

Karen and Bob Marrs

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UNIT

**Mr. James Lyman Wheeler**  
**Dr. Harriet Kimble Wrye, Ph.D, ABPP**  
17711 Porto Marina Way, Pacific Palisades, CA 90272  
Tel: (310) 454-0686; Fax: (310) 454-9464;  
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[harrietwrye@earthlink.net](mailto:harrietwrye@earthlink.net)

March 31, 2003

Maya E. Zaitzeusky  
Project Co-ordinator  
Dept. of City Planning  
200 N. Spring Street, Rm 763  
Los Angeles, CA 90012

RE: PROJECT ENV-2000-2696 ELR  
REF # SCH # 2002051086

Dear Ms. Zaitzeusky,

My husband and I have been residents of the Castellamare area of Pacific Palisades for thirty years.

We are writing to register the strongest possible protest against granting permits to Palisades Landmark Condominium Project to build new condominiums at 17331-333 Tramonto. The Castellamare hill is already fully developed, these hills are demonstrably unstable, traffic is excessive on both PCH and Sunset, the access streets for this project, and it would totally compromise the historical beauty of this quiet Mediterranean feeling neighborhood.

We already have a developer's nightmare here on Castellamare right behind our house—an unfinished eyesore that the city should never have permitted.

Please do not grant this other permit!! Thank you.



Harriet Kimble Wrye and James L. Wheeler

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

Re: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference Nos: SCH #2002051066  
Location: 17331-17333 Tramonto Drive

Dear Ms. Zaitzevsky:

I am a homeowner in the Castellammare Mesa area and I have serious concerns about this project. My main concern is for the geological stability of the hillside. This project abuts the Revetto Drive landslide, and could potentially cause devastating deterioration of the hillside. Even if the excavation does not immediately cause damage, the inadequate planning for responsibility for the future drainage will certainly lead to problems in the future. This promises to eventually be a huge legal snafu, with devastating loss of homes and property.

1

I am also seriously concerned about the traffic problem that will arise before these condos are even occupied. The construction vehicles will effectively block off Tramonto as an exit road for residents of the Castellammare area, leaving Porto Marina as the sole exit for some 200 homeowners. This road is extremely narrow and dangerous, bordered by a precipitous drop off above PCH, and is in no way designed to handle that kind of traffic. Even if the stoplight at Porto Marina and PCH is re-timed to allow for the increased traffic (which will certainly add to problems on an already overcrowded PCH) the road itself cannot safely handle the traffic. Is the city prepared to re-engineer this road BEFORE the construction project begins?

2

My final concern is for the amount of post-construction traffic that will occur on Tramonto as a result of this project. Even if Tramonto is finally re-engineered and re-surfaced, it is in no way large enough to handle the increased traffic from over 200 additional residences- effectively doubling the traffic in an already tight area.

3

I strongly urge you to deny the permits to build this project.

4

Sincerely yours,

*Amy Lemoine*

Amy Lemoine  
266 Quadro Vecchio  
Pacific Palisades CA 90272

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MAR 31 2003

ENVIRONMENTAL  
UNIT

Cc: Cindy Miscikowski, City Councilwoman  
Castellammare Mesa Homeowners Association Board

Francis and Cornelia Knotz  
17455 Revello Dr.,  
Pacific Palisades, CA 90272

March 31, 2003

Ms. Maya Zaitsevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Re: EIR Case No.: ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
No.: SCH#20002051086  
Location: 17331-17333 Tramonto Drive

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CITY PLANNING  
DIVISION OF LAND

Dear Ms. Zaitsevsky:

In a letter addressed to you dated June 13, 2002 we voiced and presented our grave concern and strong opposition to the proposed Palisades Landmark Condominium Project. Soils stability history of this site requires one more serious consideration not addressed by EIR. The provision of responsibility is missing: who should be responsible for damages to persons and property should they occur at any time during and after construction. How long should the period of absolute responsibility continue, months, years, decades perhaps? Who will carry the responsibility: the City of Los Angeles, the project manager, the property owner, the developer? What type of damages should the organizations involved in the Project be responsible for: physical, financial, soils security, insurance, traffic deterioration, etc.? None of these concerns are addressed and none of them are connected with penalties, indemnification for failures and damages should they occur.

With a project of this magnitude there is going to be extensive earth removal, excavation, compacting and construction of buildings, most of all traffic and use of very heavy equipment, all of which will in a definite way disrupt the geological stability of the site and ultimately lead to catastrophic further deterioration of site geological conditions. However the EIR is not dealing with any of these concerns, not even mentioning of required "safety bond" nor does it suggest imposition of effective penalties for failures. All this is a sign of negligent and inadequate planning. The City of Los Angeles is dedicated and obligated to protect and serve its citizens, the contemplated approval by the City of this huge project does not.

Sincerely,

Francis Knotz, MD

*Francis Knotz*

Cornelia Knotz, MD

*Cornelia M. Knotz*

Peter Knotz  
17455 Revello Dr.,  
Pacific Palisades, CA 90272

RECEIVED  
APR 02 2003

March 31, 2003

CITY PLANNING  
DIVISION OF LAND

Ms. Maya Zaitsevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

RE: EIR Case No.: ENV-2000-2696-EIR aka "Palisades Landmark Condominium Project" ("Project")

Ms. Zaitsevsky:

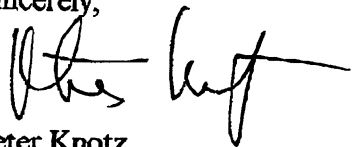
I hereby contribute my comments to the proposed Project. Please understand that these are not exhaustive and I reserve the right to make further comments when the EIR is finalized.

1. My number one concern is slope stability during the period of grading, site preparation and thereafter. Apparently this phase will take almost a year. Site clearance approximate 4 months (p. 242)<sup>1</sup>. Excavation/export approximate 3 months (p. 243). Soil import approximate 2 months (p. 243). I reviewed some of the geological data and I reviewed the EIR. There is no specific mention of any study of the slope/soil conditions above the proposed project. Yes the "slide" is studied extensively, but what about Revello Drive, or the properties which would lie directly in any new slide? Clearly, the removal of 130,000 cubic yards at the toe of the slope may have an impact on the stability of the slopes above the cut, a cut which appears to be at least the length of a football field, of which only about 20-30 yards is represented by the "slide." Is your Department truly satisfied that all the ramifications of the proposed excavation have been fully studied and examined? How is this concern addressed in the EIR? It would appear that in the EIR, at least, no geologist ventures an opinion as to how far up the slope the soils and stability of the hill should be studied before the go ahead is given for the grading permit.
2. The EIR admits there is a "controversy" regarding the "size" of the project. (p. 6). In addition to the above mentioned time period, the EIR states that "it is estimated that ... project construction [will be] 18-19 month duration." (p. 39). The operational impact of the project will be 348 "vehicle trips" per day (p. 8). But in the same breath the EIR tries to mask the enormity of the project when it states the "project would result in significant unavoidable environmental impacts relative to .... short-term grading, construction and soil haul truck noise levels, and operational traffic on residential streets." (p. 266). The "significant unavoidable environmental impact" of air pollution ("emission impacts") is not mentioned (p.

<sup>1</sup> All page references are to the DRAFT EIR dated January, 2003.

- 266). It would appear that in the minds of the developer and owner three years is a "short-term." Clearly, the environmental impacts of just the construction will be "long-term," I will have to live with the noise, smell, odors, emissions, traffic, the increased chance of accidents, street closures, for years, not months. The dictionary defines "short-term" as "covering and applying to a relatively short period of time." (Random House).
3. The project is too massive, too large. Why is there no middle ground? For example, why is there not at least one alternative that minimizes the digging, the soil removal, for example limiting the number of units to 35-40? Why not keep have an alternative that complies with the spirit of the law but truly limiting the size of the buildings to 45 feet, instead of masking the true size of the buildings underground? The only alternatives are maximum digging, excavating or nothing.
  4. Does this structure really blend in with the character of the Castellamare mesa architecture and "distinctive character?" (p. 168). Contrary to the developer's assertions, this is not six buildings but one huge, giant, massive, seven level bunker which, in my opinion, will not "preserve" the mesa's "community identity."
  5. The EIR states that the "total floor area of the proposed project (200,000 square feet) does not exceed three times the buildable area of the lot (520,106 square feet)." (p. 28). The last time I checked, when 520,106 is divided by 3 I got 173,369. Am I missing something here? Further, where does the developer get the 520,106 in the first place? I thought this was a four acre parcel, which is about 170,000 square feet. The EIR does not explain how this impact is allowed to exist. This all looks like fuzzy math to me.
  6. With respect to noise, the EIR states "in addition to on-site equipment [e.g., jack hammers] noise generation, truck traffic to/from the site would affect the off-site noise environment. Heaviest truck traffic will occur for four to six months during landslide repair and **slope stabilization**." (p. 30, emphasis added). Except for the "slide" the slope is stable now. Why does it need to be stabilized? Would the excavation "de-stabilize" the slope? Which goes back to my point 1., above. I am completely unsatisfied that a full and complete geological and soil analysis has been conducted by impartial experts who are not in the pocket of the developer.

Sincerely,



Peter Krotz



**RECEIVED**  
CITY OF LOS ANGELES

APR 03 2003

ENVIRONMENTAL  
UNIT

March 31, 2003

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

novemberfilms

17751 tramonto dr.  
pacific palisades  
california 90272  
t: 310.581.5445  
f: 310.581.6114  
novfilms@aol.com

Re: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference No's: SCH#2002051086  
Location 17331-17333 Tramonto Dr

Dear Maya,

Please allow this letter to serve as formal opposition to the condominium development slated to be at 17331-17333 Tramonto Drive.

Countless environmental surveys, Time, and numerous landslides have shown the folly of overdeveloping of our coastal hillsides; this area cannot support continued development.

Notwithstanding the fact that the pristine and unspoiled vistas are what make Pacific Palisades one of the jewels of southern California for both residence and visitors.

Sincerely,

Alan Siegel, Resident 17751 Tramonto Drive

Maya E. Zaitzevsky, Project Coordinator  
Department of City Planning  
200 North Spring Street, Room 753  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 02 2003

ENVIRONMENTAL  
UNIT

Re: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference Nos SCH# 2002051086  
Location: 17331-17333 Tramonto Drive

Gentlepeople,

I fully share the concerns regarding the subject EIR expressed by our Castellammare Mesa Home Owners Board of Directors in their letter of February 21, 2003.

I am especially worried about the effect of increased traffic on the already hazardous winding eastern portion of Tramonto Drive; at the junction where Tramonto traffic faces the often high speed traffic on Los Liones Drive; at the junction where Los Liones traffic faces the often dense high speed traffic on Sunset Boulevard; and on Porto Marina, where even a modest increase in traffic might well cause gridlock.

Sincerely,



Robert M. Fink  
17774 Tramonto Drive  
Pacific Palisades, CA90272  
March 31, 2003

cc: Councilwoman Miscikowski  
CMHO Board of Directors



April 1, 2003

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

**RECEIVED**  
CITY OF LOS ANGELES  
APR 02 2003  
ENVIRONMENTAL  
UNIT

Re: Project ENV-2000-2696-EIR  
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Sincerely,

Madisen Siegel, Resident 17751 Tramonto Dr

*Madisen Siegel*

April 1, 2003

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

**RECEIVED**  
CITY OF LOS ANGELES  
APR 03 2003  
ENVIRONMENTAL  
UNIT

17751 tramonto drive  
pacific palisades  
california 90272  
310/459 - 5895  
fax 310/454 - 1785

Re: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference No's: SCH#2002051086  
Location 17331-17333 Tramonto Dr

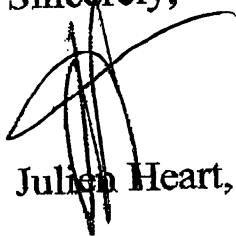
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Sincerely,



Julien Heart, Resident 17751 Tramonto Drive

April 1, 2003

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

**RECEIVED**  
CITY OF LOS ANGELES  
APR 03 2003  
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Re: Project ENV-2000-2696-EIR  
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Reference No's: SCH#2002051086  
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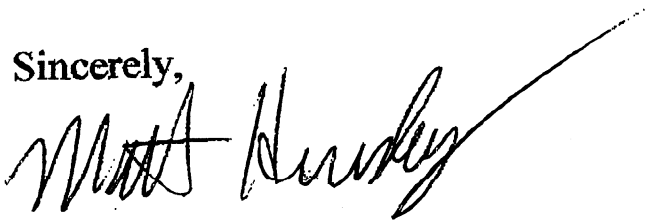
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Sincerely,



Matthew Hensley, Resident 17250 Sunset Blvd #206

April 1, 2003

RECEIVED  
CITY OF LOS ANGELES  
APR 03 2003  
ENVIRONMENTAL  
UNIT

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

Re: Project ENV-2000-2696-EIR  
Palisades Landmark Condominium Project  
Reference No's: SCH#2002051086  
Location 17331-17333 Tramonto Dr

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Notwithstanding the fact that the pristine and unspoiled vistas are what make Pacific Palisades one of the jewels of southern California for both residence and visitors.

Sincerely,

*Matthew R. Schow*

Matthew Schow, Resident 17250 Sunset Blvd #206

William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

1 April 2003

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

Re: Palisades Landmark Condominium Project, Pacific Palisades  
(EAF NO: ENV 2000-2696-EIR)  
Reference Nos SCH # 20022051086

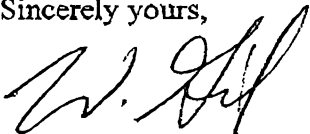
*CONFLICTING*

With the sparse data provided for the project, we have painstakingly attempted to undertake a viewshed analysis from our property and have come to the conclusion that the project, as proposed, would greatly affect our viewshed, especially our shoreline views. If you have information to the contrary, or if the developers have undertaken changes to their plans that indicate that the proposed construction does not affect our viewshed, please provide us with the appropriate documents or information.

While the burden of proof that our viewshed is affected and that the project's viewshed design is flawed should not rest on us, the affected homeowners, we are willing to meet with representatives of the City and a surveyor for the developer at any time to further analyze the viewshed issue from base viewpoint stations on our property. The attached photographs were taken from such a base station (lower deck) whose viewshed would be greatly affected.

We also insist that the project ridgelines, inclusive of all projections above the roofs be flagged (and certified as to accuracy prior to further permit processing) to provide the community as well as affected neighbors with a better understanding of the project's impacts and potential view obstructions.

Sincerely yours,



William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

cc Councilwoman Cindy Miscikowsky, City of Los Angeles  
Pam Emerson, Supervisor Regulation and Planning, California Coastal Commission,  
Los Angeles County Area

**1740 Revello Drive, Pacific Palisades: Base View Station 1**

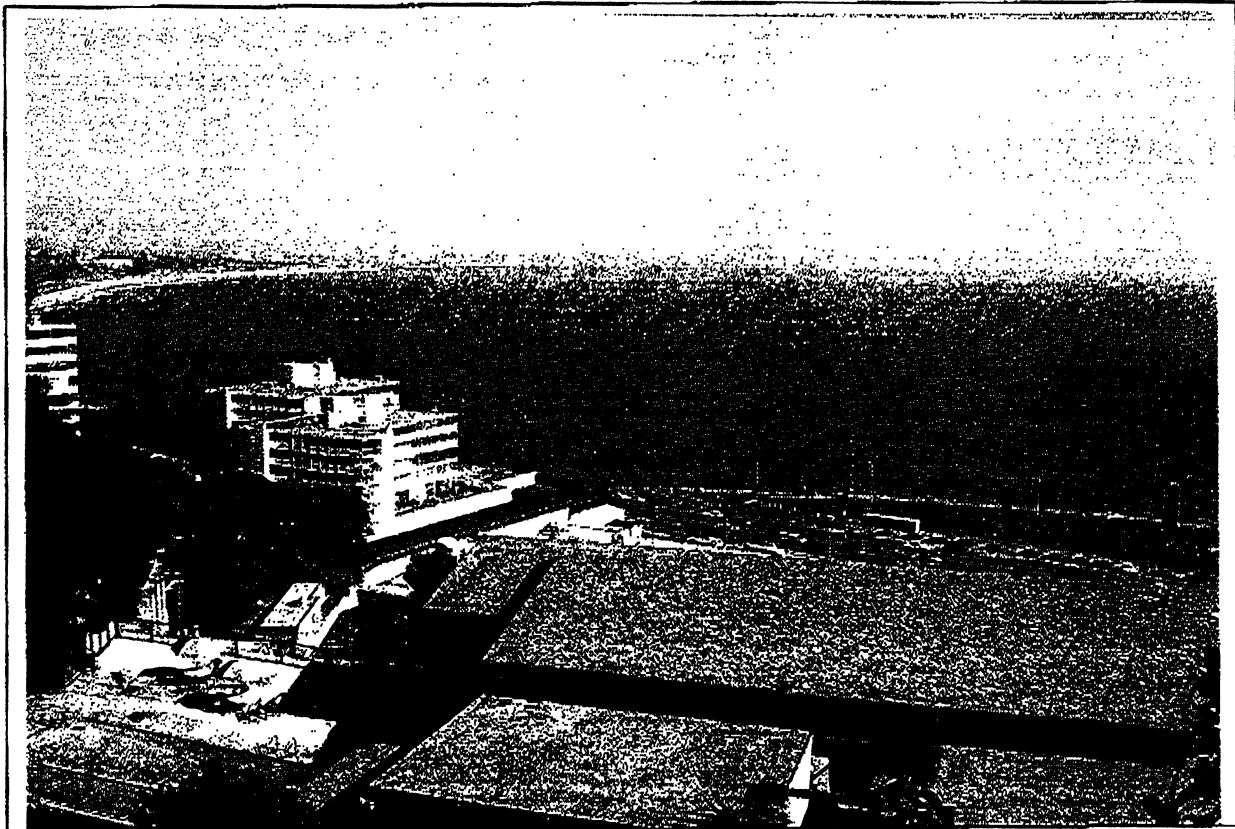


Photo 1: Looking Southeasterly



Photo 2: Looking southerly.

**17440 Revello Drive, Pacific Palisades: Base View Station 1**



Photo 3: Looking southwesterly.

William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

1 April 2003

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

Re: Palisades Landmark Condominium Project, Pacific Palisades  
(EAF NO: ENV 2000-2696-EIR)  
Reference Nos SCH # 20022051086

The proposed excavation of 2.7 million cubic feet of material and replacement of an additional 1.89 million cubic feet of material with compacting every six inches poses significant danger of damage to our adjacent property. The EIR does not specify any bond for the successful completion of the project or compensation for damage resulting from vibrational and seismic damage that might occur during the project.

} 1

The proposed movement of 4 million cubic feet of material as well as hundreds of thousands of cubic feet of concrete and other building materials would entail over 15,000 truckloads traversing the site, Tramonto Drive, and Los Lions. In the last earthquake our property sustained almost \$100,000 damage. What will the effect of 15,000 trucks passing adjacent to our property? Who is responsible if damage occurs?

} 2

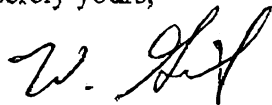
It appears that 15,000 truck loads will be staged on or through Los Lions. Will this occur in conjunction with the massive Getty project which also uses this area? We have been delayed at Tramonto and Los Lions due to Getty equipment and materials. How much more will this project contribute to our loss of use of this route of egress from our property?

} 3

Will we be required to find a separate space for work (I am working on a book and my daughter and son-in-law are students who need reasonably quite space to work and study). I strongly object to having 15,000 trucks driving under our home.

} 4

Sincerely yours,



William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

cc Councilwoman Cindy Miscikowsky, City of Los Angeles  
Pam Emerson, Supervisor Regulation and Planning, California Coastal Commission,  
Los Angeles County Area



William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

1 April 2003

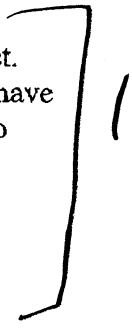
Maya Zaitzevsky, City Planning Associate  
Environmental Review Section  
City of Los Angeles  
Department of City Planning  
200N. Spring Street, Room 763  
Los Angeles, CA 90012-4801

Re: Palisades Landmark Condominium Project, Pacific Palisades  
(EAF NO: ENV 2000-2696-EIR)  
Reference Nos SCH # 20022051086

Fire Safety

Residents on Castellamare hill have been evacuated due to danger of fires in the past. The proposed project of 82 units on a 1/7 mile cul-de-sac in a fire hazard zone will have major impact on the neighborhood whose only egress is Tramonto and Porto Marino Drive.

Is a density of 82 residential units consistent with fire regulations for a fire prone mountainous area?



Sincerely yours,

William E. Grieb, Jr.  
17440 Revello Drive  
Pacific Palisades, CA 90272

cc Councilwoman Cindy Miscikowsky, City of Los Angeles  
Pam Emerson, Supervisor Regulation and Planning, California Coastal Commission,  
Los Angeles County Area

PACIFIC PALISADES RESIDENTS ASSOCIATION, INC.

POST OFFICE BOX 617  
PACIFIC PALISADES  
CALIFORNIA 90272  
(310) 454-4254



April 1, 2003

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

Re: EIR Case No.; ENV-2000-2696-EIR, Ref. No. SCH # 2002051086  
17331-17333 Tramonto Drive, 82 unit condominium

This proposed project of 82 units is out of scale for Pacific Palisades and for the coastal bluffs. It is located in an unstable area and significantly increases the traffic on a narrow street with a dangerous, steep hairpin-turn at the site entrance. The project proposed should be drastically downsized and the Slope Density Formula applied.

1

**GEOLOGICAL AND SOIL CONDITIONS:** PPRA is submitting herewith a Geotechnical Critique focusing primarily on the feasibility of repair of the landslide and summarizing the more important geotechnical aspects of the project. The report has been prepared by E.D. Michael, Consulting Geologist and Certified Hydrogeologist (see Attachment I.) Michael concludes that there are several serious weaknesses in the project design. Revised analyses based on his comments should be incorporated in a redesigned project prior to consideration of approval.

2

**Missing Reports (DEIR, Appendix I)**

The Draft EIR appear to be missing certain reports requested by the Grading Section of Building and Safety. "The reports cannot be approved as they lack sufficient information to determine the stability or safety of the proposed development," according to a letter dated October 29, 2001 from the Grading Section of Building and Safety, Appendix I. This letter in turn refers to the March 19, 2001 letter from the Geotechnical Engineering Division which requests information before review can proceed. The requested information is for a groundwater dewatering and monitoring system, analysis of slope stability of the landslide downslope of the proposed development and clarification of whether the landslide will be completely removed and replaced with compacted fill within the area of the proposed development.

3

There is no single report anywhere in this Draft EIR which provides a complete description of the proposed geotechnical concept being recommended to remove the landslide hazard and provide stability to the proposed 82-unit development. The documents represent an ongoing series of incremental changes in the proposed project design and analysis and thus are not a coherent presentation of the final proposed project.

4

EIR Case No. ENV-2000-2696-EIR, Ref. No.: SCH # 2002051086  
17331-17333 Tramonto Drive, 82 unit condominium proposal  
page 2

We are concerned about adequate provision for stability of adjacent property and structures during landslide stabilization processes. There is no time-lined detailed plan for removal of the slide debris and placement of the soldier piles during slide repair and construction phases to assure adequate safety to the adjoining properties and construction workers.

5

The DEIR states that the current apartments may be removed before slide repair. If not, are the current apartment dwellers remaining? If tenants remain, slide excavation and debris removal prior to installation of the soldier piles could cause them unacceptable levels of risk.

6

**Haul Route, Slide Debris Removal:** The on-site truck haul route in the slide area is very sketchy in the DEIR. How will the slide debris be raised from the lower slide area to the level of the access road. How will the truck turn-around be accommodated on the currently steep terrain? In another context, the DEIR mentions a possible joint project with the downslope adjacent property owner, but nothing specific is proposed. No feasible detailed approach is presented to manage the on-site soil handling for landslide repair, including compaction of imported soil.

7

**REPLACEMENT OF APARTMENTS WITH CONDOMINIUMS**

In the year 2000 Initial Study/MND, there was discussion of replacement of apartments with condominiums in the coastal zone, giving options for mitigation. The DEIR does not mention this issue of removing relatively affordable rental units. The proposed development will evict the residents of 20 apartments. Many are retired and have lived in these units for many years, some as long as 30. One new option that could be considered is giving the current tenants first option of buying condominium units at a discount price. The developer must commit to a single option for mitigating this impact, coordinated with the individuals involved.

8

**TRAFFIC AND ACCESS (DEIR IV.J Traffic)**

**During Construction**

Truck traffic for slide repair phase and the construction phases is massive and probably underestimated by the DEIR. The factors that seem variable and questionable are the amount of earth to be removed, the size of the trucks, the hours of hauling.

9

The quantity of soil to be exported during slide repair is 100,000 cubic yards of naturally compacted soil. That soil will expand approximately 20 percent in the process of being disturbed and loaded onto trucks, making the actual soil removal requirement 120,000 cubic yards.

The developer assumes that a 14 cubic yard capacity truck can be used on this project. That assumption must be justified, taking into consideration the steep terrain and space available on site. It is possible that a truck of 8 to 10 cubic yard capacity is the largest that can maneuver in the available restricted space.

FIR Case No. ENV-2000-2696-FIR, Ref. No.: SCH # 2002051086  
17331-17333 Tramonto Drive, 82 unit condominium proposal  
page 3

The DEIR says haulers can move 100,000 cy in 256 vehicle trips per day (vtd) in 3 calendar months (p. 243.) The DEIR is not clear on how many hours per day and days per week (pp. 30, 31, 40, 186, 219, 243).

10

Our analysis says the DEIR vtd trip figures are low. Using the more accurate figure of 120,000 cy earth to be exported in 3 calendar months with two sets of assumptions about truck size, hauling hours per day and number of days per week, we calculate the number of trips per day required and the resulting minutes between trips.

11

**REQUIRED HAULING TRIPS AND TIMING TO MOVE 120,000 CY IN 3 MONTHS UNDER VARIOUS CONDITIONS:**

Truck size	Hauling Schedule	Required VTD, Minutes between Trips
14 cy	11 hour day, 5 days/wk	286 Vtd 4.6 minutes between trips
	7 hour day, 5 days/wk	286 vtd 2.9 minutes between trips
10 cy	11 hour day, 5 days/wk	400 vtd 3.3 minutes between trips
	7 hour day, 5 days/wk	400 vtd 2.1 minutes between trips
8 cy	11 hour day, 5 days/wk	500 vtd 1.7 minutes between trips
	7 hour day, 5 days/wk	500 vtd 2.6 minutes between trips

Can trucks be loaded and turned around in the times calculated to meet the 3 month time allotted for hauling? The times must be realistic for on-site debris removal and loading. The actual loading times may exceed the times calculated for the "Minutes between trips" required to meet the 3 month schedule. If so, the developer's projected hauling calendar time must be increased.

12

**ROAD MAINTENANCE: HAULING TRUCK IMPACTS**

In addition to the soil hauling truck traffic, the proposed project will require upward of 1000 cy of ready mix concrete. A typical cement truck capable of hauling 10 cy of concrete weighs 76,000 pounds (38 tons.) This adds to the thousands of soil hauling trips by only slightly lighter trucks (61,000 pounds/31 tons, per the DEIR.) This is likely to cause severe maintenance problems to the haul route roads, Tramonto, Los Liones, Sunset and PCH, with attendant costs which should be borne by the developer.

13

EIR Case No. ENV-2000-2696-EIR, Ref. No.: SCH # 2002051086  
17331-17333 Tramonto Drive, 82 unit condominium proposal  
page 4

**TRAFFIC FROM THE COMPLETED PROJECT**

The increased traffic from the project after completion as well as during construction may lead to a dangerous situation at the intersection of Los Liones and Sunset Boulevard at rush hour and other heavy traffic times on Sunset. There is no signal and visibility is poor for those turning onto Sunset due to Sunset's curves.

14

The Street Segment Impact Analysis (DEIR, IV.J, Traffic, p.240) presents this bit of nonsense on the effect of traffic on Tramonto and Los Liones, "The approximate 470-foot long segment of Tramonto Drive between the project driveway and Los Liones Drive, which is expected to be used entirely by project traffic. is undeveloped on both sides. Consequently, the flow of project traffic on this segment of Tramonto Drive would not be affecting any residential or other developed use." The residents who live above the project will be surprised to hear that since they drive it daily and according to the chart above this quote there were 1,930 vtd in 2002 on Tramonto south of Los Liones, with 20 units on the subject site (133 vtd, Appendix D) rather than 82 units requested. Further, there is an additional new 16-unit project proposed for Los Liones.

15

**NOISE IMPACTS**

The construction vehicle noise impacts are proportional to the number of truck loads per day. Above it was noted that the DEIR estimates of loads per day/trips per day (1 load per day equals 2 trips per day, in and out.)

16

Accounting for the revised estimated number of soil truck loads per day from 128 to 143, 200 or 250 (depending on truck size, see above). This means 256, 248, 400 or 500 vehicle trips per day. Extrapolating the noise data presented in Table IV.G-3 (p. 187), the ambient noise levels would increase 1 to 2 db.

**IMPACTS ON LOS LIONES STATE PARK**

The DEIR barely mentions that nearby Los Liones Canyon is an entrance and trail head into Topanga State Park. The lower park has been greatly improved by planting, a mural and reconstruction of the stream in the last few years. The DEIR says that construction workers can park along Los Liones Drive (p. 40). The noise and fume impacts on the park are not discussed.

17

**ENVIRONMENTAL IMPACTS (DEIR IV.I. 5 AND IV.J)**

**Project Impacts. Soil export amounts, page 219.**

Page 219, paragraph 2 is incomprehensible. The amount of exported soil per day 3,500 cy multiplied by 120, the number of hauling days, calculates to 420,000 cy instead of the total of 100,000 cy the developer says in several other places will be exported.

18

DEIR Case No. LNV-2000-2696-DEIR, Ref. No.: SCII # 2002051086  
17331-17333 Tramonto Drive, 82 unit condominium proposal  
page 5

The paragraph calculates the project grading duration of 120 days based on 8 hour hauling days and then says that hauling may occur only 7 hours a day. That means grading duration may actually be extended to 137 or more days of noise, dust, fumes and increased truck traffic on local streets.

18

The last sentence of the paragraph says, "Grading of the project site will also require 2,500 cy of imported soil per day." What does this mean? For how many days? 120? 30 days? Page 243 estimates 2 months for import.

The DEIR is inconsistent and unclear on whether the projected times are hauling days or total calendar days, 5 days a week or 6? Note that page 243 estimates 3 months for export and 2 months for import. How many hauling days in a month?

**VIEW AND MASSING (DEIR IV.B p. 75)**

The 82-unit condominiums present a wall of stucco and glass not matched along the coastal bluffs of Pacific Palisades. To assert that it will not affect coastal views is absurd. Tens of thousands of people daily will see this cliff dwelling from Pacific Coast Highway and from the ocean, beach and beach parking lot. Landscaping could not mask this place because it covers the site so thoroughly and because trees would not be planted in front of the windows to obstruct the views of the Pacific Ocean. While it is true that the corner of Sunset Boulevard and Pacific Coast Highway is a commercial area, the business buildings are not situated on the coastal bluffs, but at street level and on nearly straight, wide highways.

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This project is simply too large for this unstable site, for its coastal location and for narrow Tramonto Drive with the hairpin turn on which it is proposed. The Slope Density Formula should apply here to reduce the size of the project.

We question the accuracy of scale of the structures in the artist's rendering and would like to see an overlay of the existing apartment buildings over the Sections of Figure III. The four-story structures appear to be shorter than the existing two story buildings. The windows appear too small. A full mature tree has been added on the right behind a building.

**HILLSIDE ORDINANCE (DEIR IV.F, p. 166)**

Under Land Use/Environmental Setting, the developer states that the Hillside Ordinance does not apply because the project is accessed from Tramonto Drive, a Limited Hillside Street of 36 feet which is fully improved. "Therefore, the project is exempt from the Hillside Ordinance (Request and Findings of Coastal Development Permit.) In the DEIR and Appendix, we find no document with findings on this subject, nor a CDP. We request that any such document be included in the environmental documentation for this project.

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**SLOPE DENSITY FORMULA HAS NOT BEEN APPLIED**

The DEIR does not use Slope Density calculations in determining the number of allowable units. Eighty two units would be allowed under the RD2-1 zoning on property of this size which does not have a significant slope. This property has a significant natural slope. The only flat areas are the building pads for the existing apartment buildings and the access road.

It is difficult to believe that the density of the project would not be determined by the steepness of the property whether or not the adjacent road is improved to greater than 20 foot width. In this case that road is steep and has a hairpin turn right at the access driveway to the project.

**SAFETY: REQUIREMENT OF A BOND FOR COMPLETION AND PROTECTION OF NEIGHBORS**

The plan to remove and recompact the landslide which took out the prior apartment building involves huge expense and a great deal of time. Any project which is approved should require a completion bond to cover the stabilization aspect of the site. Should the project not go as planned, failure to complete in a timely manner would present problems for the city and adjacent property owners. In addition, neighbors must be protected by such a bond from potential slope failure caused by the construction and grading and potential failure of the drainage system after construction.

Disclaimers of final elimination of risk for the project's safety appear throughout the DEIR and Appendix. For example, an entire page of J. Byer Group Report, August 16, 2000, p.38 states that , "The exploration was performed only on a portion of the site, and cannot be considered as indicative of the portions of the site not explored." The developer proposes to attempt to stabilize the portion of this huge slide on his property. On December 5, 2001, the Chief of Grading Section of Building and Safety approves the Tentative Tract 52928 subject to stringent conditions including that the owners record a sworn affidavit of awareness that an active landslide will still border three sides of the western portion of the site (buildings 1 and 2) after completion of the development, and that debris may collect affecting the surface drain system, and that there is potential for the landslide to remove support from the lower property line.

**SAFETY: ACCESS AND ESCAPE ROUTES**

Having one route for ingress and egress, over the top of a garage, is inadequate for safety. In a June 11, 2002 letter, the Land Development Group of Los Angeles City Bureau of Engineering states, "The developer should consider having a secondary emergency access to the project site and delineating it on the map for Tract No. 52928." Safety issues include potential earthquake damage to the garage, fire on or off site or instability in the area. In case of disaster, Tramonto traffic could be backed up, trapping residents if there is no secondary access.

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**INSPECTION**

The detailed landslide repair and construction inspection schedules must be made available to the public. Palisadians have experienced numerous cases where developer promises are not kept and the understaffed City Building and Safety Department does not provide adequate oversight. Citizens must have the ability to monitor if the required inspections are happening and are being done properly. For the assurance of the neighbors at risk, inspections of three types must occur: regular, event-driven and unannounced.

PPRA will appreciate your close attention to the matters raised on this highly controversial project. Please put PPRA on the distribution list for future notices.

Prepared by

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*Bob Cavage*

Robert L. Cavage, Board Member

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