

APCW 2006-9483-SPE-CDP-CU-SPP-SPR-MEL

Los Angeles City Planning Department  
200 South Spring St.  
Los Angeles, CA 90012

3/23/2007

Re: ENV-2006-9485-MND  
901 S. Abbot Kinney Blvd.

do not adopt MND  
why not EIR

I am writing on behalf of several neighbors living within 500 feet of the proposed project cited above. We would like to voice our concerns about the Proposed Project's contribution to cumulative impacts regarding traffic circulation and cut-through traffic. Two recently approved projects and one under construction within 500 feet of the Proposed Project were not properly accounted for in the Draft Initial Study.

Didn't show benefit of MND

**BACKGROUND:**

We are located 528 feet northwest of the proposed project in the area bound by Brooks Ave. (south), Thornton Place (north); and between Main (east) and Pacific (west). This 4.25 acre neighborhood is made up of narrow alleys and walk streets. Most maps do not indicate that there is no vehicle access in this area of walk streets except for the narrow alleys that serve this residential area. (Map 1)

Precedent MTA

The largest "street" is an alley called Thornton Place which is designated a local street but is unimproved. The roadway functions as a local alley connecting to another alley, Royal Court, and serves the residential block to the south. Thornton Place is not constructed through to Pacific Avenue. The roadway is approximately 16 to 20 feet in width. Royal Court narrows down to a one-lane, two-way alley. Additionally, there is no east/west through street to Pacific from Main in this area. (Map 2)

From a historical planning perspective:

*"The street system was not designed for automobiles. [Abbot] Kinney intended visitors to walk or board a gondola when visiting his city. A network of streetcar tracks and the 'Speedway', a narrow alley parallel to the beach, were his only concessions to vehicular transportation." (P.17 Planning Report Venice Community Plan Study)*

The street system in this particular area has not been improved or changed since it was originally laid out a hundred years ago. During that time the area has become more densely populated and the second most visited tourist area in California with more traffic and bigger vehicles.

We are concerned that the Project's contribution to cumulative impacts regarding cut through traffic in the area will be considerable.

With those stated conditions, the following are our specific comments on the Draft Initial Study:

**RELATED PROJECTS NOT CORRECTLY LOCATED OR ACCOUNTED FOR**

The Related Projects Maps in both the Traffic Study (Figure 7) and the Related Projects Location Map (Figure II-6) in the DRAFT INITIAL STUDY do not properly locate some of the related projects cited. If the locations are not true then the analysis cannot be a true indication of the cumulative impacts the Project will have in the neighborhood.

Of the following three projects, (of which two have been "approved" and one currently under construction) two are not mapped at the correct location and one does not appear at all:

**100 E. SUNSET AVE. (MTA PROJECT)**

#20 on both the Traffic Study Related Projects (Table 7) and the Project Description List of Related Projects (Table II-1). This project consists of 225 dwelling units and 13,300 sq. ft. commercial; (conditioned down to 156 units and 10,000 sq. feet commercial). Although this project has been "approved" the conditions are being appealed. Traffic Study # 20 is on Sunset between Main and Pacific but appears on both maps to be on Sunset between Pacific and Speedway. This is at least two

It does make it possible that other info is incorrect and therefore this is not a true representation of local traffic

and a half times further away from the proposed project than it really is.

The MTA project is in fact 897 feet northwest from the proposed project and NOT 2428 feet away as it appears on the *Related Projects Location Map (Figure II-6)* of the Draft Initial Study and the *Related Projects Location Map (Figure 7)* from the Traffic Study.

#### **806-812 MAIN ST. (PALIHOUSE)**

#21 on the *Project Description List of Related Projects (Table II-1)* and NOT included in the traffic study is this mixed use project comprised of a 43 room extended stay hotel with a 5 unit condo component and 3000 sq. ft. commercial component. Although this approved project is across the street and less than 100 feet northeast of the proposed project it is located more than a mile northeast of the proposed project on the *Related Projects Location Map (Figure II-6)* of the Draft Initial Study. The PALIHOUSE is mapped over a mile away when in fact it is across the street from the proposed project.

Although the Traffic Study does show a project # 21, it is located at 115 Lincoln Blvd. (Lincoln and Machado) over a mile away northeast and is not the same as project #21 in the Draft Initial Study.

#### **700 MAIN ST. AND 815 HAMPTON DR. (DOGTOWN STATION)**

Currently under construction, this project consists of 35 condominiums and is not included as a Related Project under construction even though it is less than 100 feet northeast of the proposed Ray Hotel. This project was also NOT considered as part of the Traffic Study. (*Map 1*)

#### **ENVIRONMENTAL SETTING OF THE AREA**

Project Objective C is "To provide an attractive and harmonious development in Venice, which takes into consideration the ....environmental setting of the area..." (*Project Description Page II-30*)

The report did not take into consideration the major feature of Venice Beach as the second most popular California tourist destination or that this it is a visitor serving area. To only mention in the report that "Venice Beach is ¼ mile from the proposed project" hardly takes into consideration the many impacts on the surrounding neighborhood that already exist and which the Proposed Project could compound or increase.

This would include the possibility that the increased Project-related traffic would utilize neighborhood serving alleys as access routes to avoid congestion on the primary travel routes, and thus would create major difficulty for residents accessing their properties.

Additional analysis should be conducted to evaluate these effects. Additionally, the effects of an increase of pedestrian traffic to and from the Project to the beach and boardwalk in relation to pedestrian safety should be analyzed as Brooks Ave. will be a pedestrian gateway to the beach from the Project.

#### **TRAFFIC STUDY**

Cumulative impacts on our resident serving alleys from the other three projects (MTA, Dogtown, and Palihouse) in combination with the Proposed Project were not analyzed in a meaningful manner. The three projects are either not being included in the traffic study or their locations were incorrect.

As the locations of related projects mentioned above are flawed and/or not included, the Traffic Study is only partially indicative of the potential impacts on circulation and cut through traffic in this neighborhood. There is a possibility that the Project-related traffic could utilize residential serving alleys as access routes to avoid congestion on the primary travel routes. Additional analysis should be conducted to evaluate these effects and possible mitigation measures.

Traffic volumes for existing conditions were obtained from manual traffic counts conducted in April 2006 and supplemented with a manual traffic count conducted in March 2006 and do not take into account the summer months that create a huge influx of beach-bound traffic to our area.

The Traffic Study doesn't take into consideration the practical impacts that cut-through traffic on the narrow alleys will have on residents in the area.

The Department of Transportation is already aware that the intersection of Pacific and Brooks has a very high number of accidents in the City of Los Angeles. Adding more vehicles will create optimal conditions to increase those numbers.

#### **NUMBER OF RELATED PROJECTS**

"In coordination with the City of Los Angeles Department of Transportation and the City of Los Angeles Department of City Planning, a list of 82 related projects was developed. These related projects are listed in Table II-1 and shown in Figure II-6 Related Projects." (II. Project Description Page LL-7)

Although a list of 82 related projects was developed with the above mentioned agencies only 42 are listed in *Table II-6 Related Projects*. The listed projects from LADOT total 47 and duplicate 34 of the related projects listed on *Table II-6 Related Projects*, so it's not clear if 82 or 47 projects total were included in the studies. This discrepancy in the number of related projects cannot present a true picture of the cumulative impacts in combination with the Proposed Project.

#### **CONCLUSION**

The Proposed Project in combination with Related Projects and existing traffic conditions in the North Beach area of Venice are sure to impact the narrow resident serving alleys through our neighborhood.

We are requesting the cumulative impacts be revisited using the correct locations of the Related Projects and a complete and specific traffic study that would include this neighborhood to be conducted and mitigation measures provided.

Thank you for taking the time to listen to our concerns.

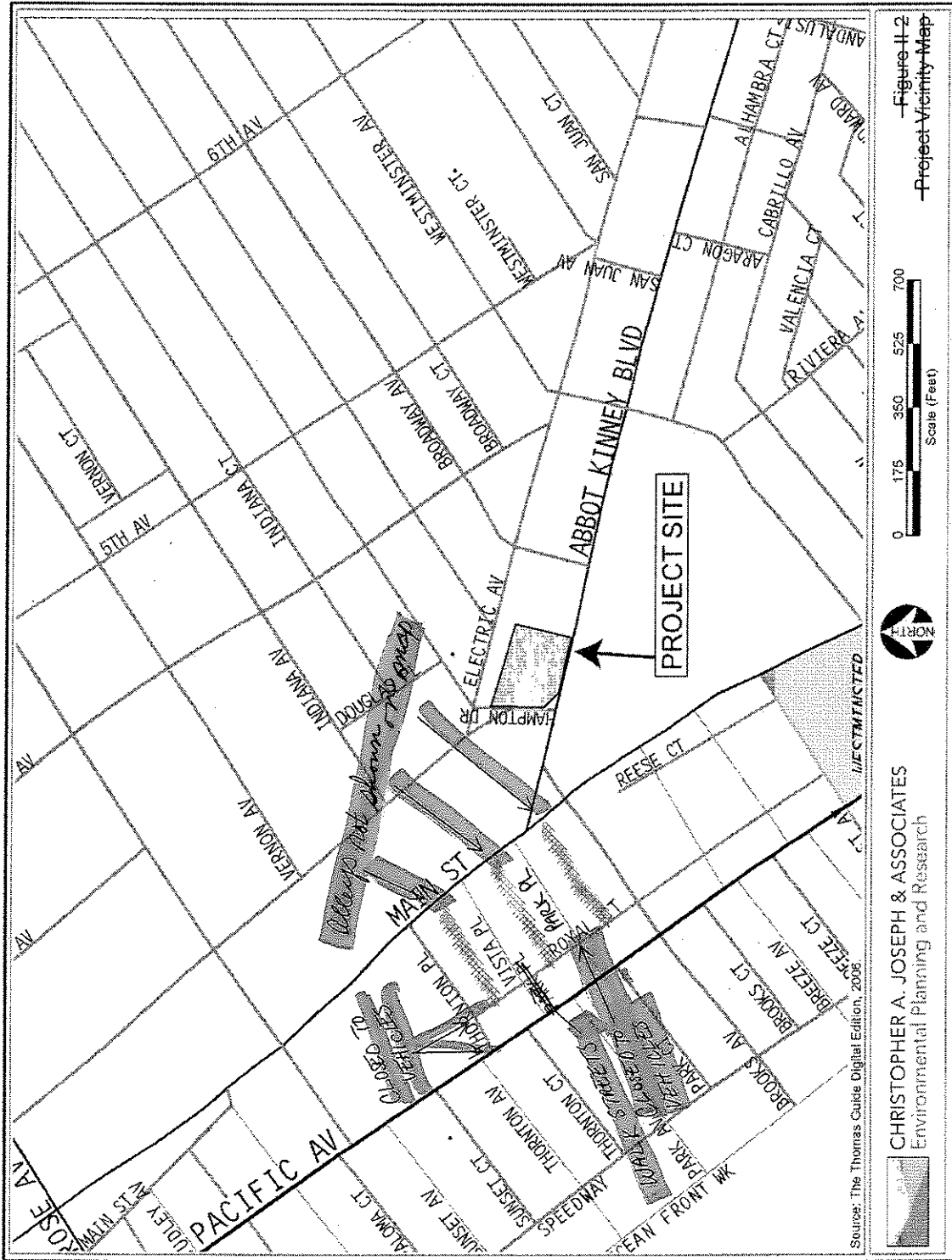
Sincerely,

Carmel Beaumont  
108 Vista Place  
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310-450-0106

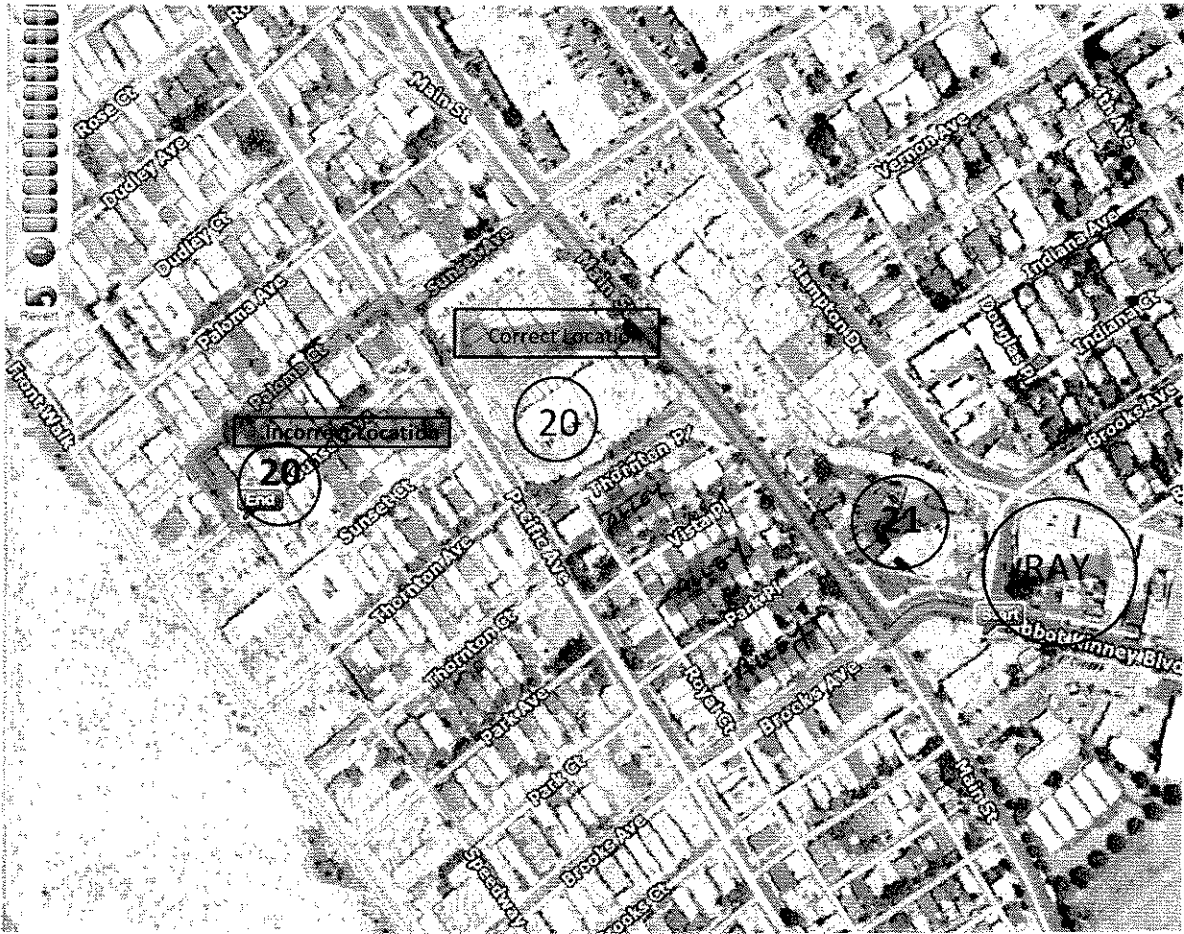
Sunny Tomblin  
109 Vista Place  
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Enclosures



Map 1



Map 2