

Flower Street Lofts Homeowners Association
1130 S. Flower St.
Los Angeles, California 90015

March 16, 2007

Amacon, Inc.
Suite 300-911 Homer Street
Vancouver, BC V5B 2W6

RE: Amacon Project-1133 South Hope Street, Los Angeles California
ENV-2006-8931-MND, ZA 20069696-ZV-ZAA-SPR, VTT-68095

Gentlemen and Ladies:

Thank you for meeting with our homeowners on Tuesday evening, March 13. We were pleased to be able to have the time to address with your representatives the many questions raised by this project. As at least one of the homeowners expressed during the open forum, we were disappointed that you had not further considered other modifications beyond those mentioned at the City hearing two weeks ago or responded yet to the City's requests, but are aware that we had not submitted your requested "wish list" from our homeowners, which may have delayed such response.

We have set out that list in this letter. The contents should come as no surprise given the comments raised in our submissions to the City and repeated at the City Planning Department public hearing on February 28, the downtown neighborhood council subcommittee meeting and our meeting on Tuesday night.

The priority items absolutely necessary if we are to advise the City, the CRA and other stakeholders that we are comfortable with the project moving forward without further studies or an Environmental Impact Report are the following.

- 1. Move the parking entrance to Hope Street and locate the exit at the southern end of the project on the alley.**
- 2. Reduce the parking podium height to two levels of above-ground parking.**
- 3. Set the parking podium back from the alley property line the same distance, twelve feet, as the set-back for the current AEG parking structure, and create pedestrian-friendly features there.**

Items we also feel strongly about and would like to see accomplished if at all possible are listed after the explanation of our priority requests immediately below. We appreciate your consideration of these items as well.

Priority Items

- 1) Move the parking entrance to Hope Street and locate the exit on the southern end of the project on the alley.**

Placing both your parking entrances/exits on the alley side of your project is a recipe for trouble, both for your building and for ours. Pembroke Alley is narrow, and because of the Blue line trains on our

Flower St. Side, the only access to our building for commercial and emergency vehicles. If large delivery trucks or fire trucks were outside our alley entrance, all access by your residents to their parking structure could be blocked under your plan, in the case of a fire emergency, possibly for several hours. Do you really want that?

Interestingly, you stated that loading and unloading for your building would be on the Hope Street side, so as to avoid blocking the alley. Our building simply does not have that luxury: all vehicular access to our building has to be through the alley. We do not want a situation where your residents have no option to access their parking and our residents and guests who are pedestrians (as well as the pedestrians from the AEG parking structure going to Staples and the persons coming from the blue line subway stop up into South Park) are forced to dodge traffic. Moreover, given the narrow width of the alley, we do not want to be in a situation where your residents' vehicles could prevent an emergency vehicle from reaching our building.

Moreover, from the perspective not only of our residents but also of yours, having the sole vehicular entrance to the building on the alley is problematic from a traffic congestion standpoint. We discussed Tuesday night significant congestion in the alley from service vehicles and from the valet parking at The Palm. Your representatives questioned whether The Palm was correctly using the valet service, but that discussion lost sight of the fact that the issue from The Palm parking is not only congestion in the alley, which occurs regardless of where their valet takes the car as the cars go through the alley to the parking entrance (now in your lot and after construction in the AEG lot) but also and more importantly on 11th Street, where cars must stop in the left lane for the valet station, creating a blockage for those turning left into Pembroke alley, which all of your residents would have to do under your current plan in order to reach their parking facility.

Your representatives stated that the original drawings for the building contemplated parking access on Hope Street and that the access was changed at the request of CRA to foster a "Hope Street Promenade." While there may at one time have been such a plan, recent development on Hope Street demonstrates that the plan is not being enforced. As we pointed out in our supplemental letter to the City, there are curb-cuts along every block of Hope Street between the proposed development and the Library. In fact, the final block of Hope Street near the Library is almost exclusively parking entrances. The new South Group developments, the Packard Lofts, the Ralphs Supermarket, the Hope Village and the Met Lofts Structure all include or will include access onto Hope Street through curb-cuts.

As you are aware, one of our primary concerns is the pedestrian nature of Pembroke alley and the ability to maintain that to the largest extent possible. Although you seem to dispute the fact that the Pembroke entrance is our front door, it is, indeed, used as our front door by all of the residents and by our guests. City plans must be considered in light of the actual circumstances in a particular location. Given the fact that Pembroke Alley is our front door, is a pedestrian access zone and is congested by other traffic, even with the significant set-back of the AEG parking structure of 12 feet, the decision to place all your parking entrances and exits on the alley to preserve what appears to be a non-existent promenade is not practical or reasonable. As you are aware, our homeowners were not consulted at any point in earlier discussions about this issue and obviously would have raised it at that time. We request that you revisit this issue with the CRA and any other relevant agencies who you claim have "mandated" the access through the alley.

2) A maximum of 2 levels of above-ground parking.

Minimizing the parking podium height is essential because of (a) the closeness of the proposed structure to our building (24-32 feet, depending on the ultimate set-back), (b) its position directly opposite the front of our building and the only windows in the units on that side of our building, and (c) the shade effect on our building.

You have already proposed putting one additional parking level underground, leaving only 5 levels above ground. All but two levels, however, can and should be below ground (or eliminated, as discussed below) so as to maintain consistency with the surrounding buildings and to reduce the shade and shadow and the visual-aesthetic impacts on our building.

As you are well aware, among the three new residential towers in our vicinity, both Luna and Elleven have only two levels of above ground parking, and a Evo has a three level podium. No building in the area has a parking podium nearly as high as the one your are proposing. (The Met Lofts apartment building has above ground parking, but that parking is not a podium, only affects the residents of Met Lofts and faces Hope Street.) You have proposed matching the height of the AEG parking structure. Two important factors regarding that building are that it was a preexisting structure when Flower Street Lofts was adapted and its shade impact on FSL is minimal as it is primarily located across from the commercial building at the corner of 11th and Flower and not in front of our building.

We recognize that subterranean parking is more costly to construct, but all environmental mitigations cost money, and this one does not impose an unreasonable burden on your project. Furthermore, given your prior agreement to at least a four foot setback on the above-ground levels, the ability to have parking with no setbacks below ground would seem desirable and would maximize the parking for your project

We also note that your request for a variance to permit 1:1.6 for parking could be modified to request parking along the lines of 1:1 or 1:1.25, similar to apartments. You have requested 28 stalls for commercial parking in the structure despite the fact that there are no requirements for such parking, and there is a parking structure immediately adjoining the proposed project which could provide all of that commercial parking. Moreover, you intend to allow guest parking for your residents, a benefit not provided in most similar towers downtown. If the parking were reduced to 1:1.25 and the commercial stalls eliminated, the necessary parking would be reduced by at least 82 stalls. This is nearly two floors of parking as the existing plans are designed. Thus, even if, by hypothesis, three additional levels below ground are problematic, the amount of parking needed could be significantly reduced if you are willing to ask for a different variance. As this building is located almost adjacent to a subway stop and many bus services, such a variance would be transit friendly.

We understand in any event that the side of the parking podium facing the Flower Street Lofts will be fully enclosed by glazing and will be landscaped to provide greenery and reduce noise, pollution and headlight glare to FSL homeowners.

3) Set back on the alley to the depth of the AEG parking structure and make, at a minimum, pedestrian friendly modifications to the alley.

We also feel strongly that a set-back to the depth of the AEG structure (12 feet) would be appropriate. Your architect started his presentation to us by noting that in any other city, the parking would be below ground because it would take away from FAR. Los Angeles does not have that requirement, but it does show that the engineering, both structurally and architecturally, to have setbacks is eminently feasible.

We recognize that there are cost factors involved, but those factors alone should not govern the determinations by the developer, the City or CRA with regarding to pre-existing residences. As we have pointed out before, many of the studies in your MND factored in 80 foot distances for environmental impacts whereas FSL building front is only 24 feet from your project wall. The study you submitted to the City noted that decibel levels increase exponentially as distance decreases. Thus, a decibel increase that is within acceptable ranges at 80 feet may very well not be acceptable at 24 feet. Your MND does not address 24 feet and you noted at the meeting on March 13 that the study was based on standard studies which also do not evaluate such short distances. Further setting back the building so as to increase the distance between the project and the FSL building to 32 feet will decrease noise, increase the availability

of pedestrian safe zones in the alley, and decrease the shade impact of the proposed project on FSL.

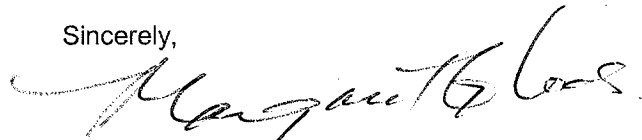
Of course, even failing any further setbacks, the alley needs to be made pedestrian friendly in every way possible. There was no discussion by your team at the meeting of proposals for improving the alley in that respect, be it by planting, pavers, painting the alley, installing speed bumps or through other potential solutions. Because we raised those issues at our initial meeting with part of your team, at the City Planning hearing and at the Downtown Neighborhood Council meeting, we expected to hear some proposals from you in response. We are interested in determining what can be done to make the alley safe for our residents, the residents of your building, our guests and visitors to the Staples Center and LA Live venues.

Desirable Items

1. Construction mitigation: We request that the you consider eliminating or modifying the Saturday construction hours in view of the proximity to our structure. The MND described construction noise at 80 feet, but not at 20 feet and due to the significant increase in noise, some limitation of the noise on the 6th day of the week would be tremendously beneficial to the persons who live and work in FSL. In addition, we would like to arrange ongoing consultations with you and your project manager as to mitigation during construction, including such things as being advised when specific actions will occur that are likely to affect us (such as painting which may cause overspray onto our parking structure as occurred during the interior painting of Luna 80 feet away).
2. Alternate parking: We ask that you consult with AEG about the possibility of using the AEG parking structure for some of the parking needs for the building. The FSL unit has its parking through a long term lease with the AEG structure.
3. A paseo: Consider use of a paseo in place of the 16-foot side-yard variance to increase the pedestrian flow in the area and maximize commercial use of the ground floor. The rendering we provided at the March 13 meeting showed the possibility of a pedestrian alley with a commercial use similar to existing paseos downtown. Given the planned park across Hope Street, this would truly maximize the pedestrian feel of the area.
4. Responses to concerns raised by the City. To our knowledge, Amacon has not yet responded to the concerns raised by the City Planning Department as to the studies in the MND, including the sun/shade study and the traffic study. As pointed out at the City Planning Department hearing, there appear to be errors and inconsistencies in the MND which should be addressed.

We look forward to working with you to finalize this project in accordance with the foregoing.

Sincerely,



Margaret G. Lodjse
Flower Street Lofts, Homeowners Association,
Secretary

CC: Jim Reis, Craig Lawson & Co.
Honorable Jan Perry, 9th District

Maya Zaitzevsky
William Jackson, Chair, Community Redevelopment Agency
Cecilia Estolano, Chief Executive Officer, Community Redevelopment Agency
Greg Fischer
Karen Yamamoto
Jeff Lee
Russell Brown, Downtown Neighborhood Council
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Michael Pfeiffer, South Park Stakeholders/Business Improvement District
Ted Tanner, AEG Corporation