

October 28, 2019

Via Hand Delivery

Planning and Land Use Management Committee
Los Angeles City Council
City Hall
200 North Spring Street, Room 395
Los Angeles, CA 90012
Attn: City Clerk

Re: **Southern California Flower Market Project / Case Nos. VTT-745868-1A;
CPC-2016-3990-GPA-VZC-CUB-ZV-SPR; ENV-2016-3991-EIR/Council File
No. 19-1048-S1**

Honorable Committee Members:

We submit this letter on behalf of American Florists Exchange, Ltd. ("AFE"), the long-time owner of the approximately five-acres commonly referred to as "The Original Los Angeles Flower Market," which occupies the majority of the city block located immediately across Wall Street from the Southern California Flower Market ("SCFM") project site. Approximately forty vendors presently operate at the Original Los Angeles Flower Market. The stretch of Wall Street between the Original Los Angeles Flower Market and the SCFM constitutes the heart of the Flower District.

AFE is in support of the SCFM project (the "Project") and believes that it will enhance and energize the area. AFE's key concern is to ensure that the Project is designed and implemented so as to be compatible with the existing operations and activities in the surrounding wholesale and retail Flower District. In particular, the introduction of sensitive residential uses in the midst of this long-established commercial/industrial hub requires a project design for the residential tower to adequately buffer future residents from peak nighttime noise.

To authorize the new residential and commercial uses, the City has been asked to adopt a General Plan Amendment from Light Manufacturing to Community Commercial and to remove Footnote No. 2 and a Vesting Zone Change and Height District Change from M2-2D to C2-2, together with a Vesting Tentative Tract Map ("VTT"), Site Plan Review and other ancillary discretionary actions (the "Project Approvals"). The Flower District is a crucial local and regional economic driver and the epicenter of the City's horticultural industry. Consistent with

the many applicable General Plan policies, the continued vitality and competitiveness of the existing Flower District operations are to be protected. In sum, the successful balance of the Project's mix of uses in compliance with the City's land use policies and regulations depends upon ensuring that the new uses are designed to be compatible with the surrounding floral industry marketplace.

With that in mind, AFE and the applicant have been engaged in discussions to address construction staging and access considerations as to Wall Street during the three years of Project construction as well as the existing nighttime noise levels endemic to Flower District operations that start as early as midnight and intensify through the early morning hours. For example, delivery vehicles, metal pushcarts and other activities generate intrusive single-event noise spikes during sleeping hours. The State Building Code's 24-hour average interior noise standard is not designed to properly account for and safeguard against individual noise events that can disrupt sleep.

To date, progress has been made in the ongoing discussions as to a variety of issues, and the dialogue is continuing. Per those discussions, acoustical studies have been performed to identify existing peak ambient noise conditions at the proposed residential boundaries of the Project, including maximum noise levels generated by loud single-event noise occurrences. AFE's objective is to identify design criteria for windows and building envelope openings to buffer affected dwelling units from potential sleep interference to occupants due to the proximity to various Flower Market nighttime and early morning activities and operations.

AFE believes that incorporating these standards is critical to the success of the Project in assuring the comfort and livability of the new residences. While we are hopeful as to the outcome of the ongoing discussions with the applicant, unless and until such criteria are adopted, we reiterate and reserve our prior correspondence, submittals and testimony and those of others as they relate to the requested Project Approvals and underlying findings and the Project EIR and CEQA findings, including the VTT appeal.

Sincerely,



Elizabeth Watson

EW/sab

cc: Mindy Nguyen, City Planner
Ed Casey, Esq.