



LOS ANGELES CITY COUNCILMEMBER
GREIG SMITH
TWELFTH DISTRICT
September 10, 2007

Joyce Pearson
Woodland Hills-Warner Center Neighborhood Council
20929 Ventura Boulevard, Suite 46-535
Woodland Hills, CA 91364

Dear Joyce:

I NEED YOUR HELP!

I am writing to ask that you and your Neighborhood Council join me in opposing the proposed massive Las Lomas Development Project. This development would have a profoundly negative impact on the entire San Fernando Valley.

In furtherance of your Neighborhood Council's mandate to review policy and programs of the City and to facilitate communication between City Council offices and community stakeholders, I urge you to oppose this project for just some the following reasons:

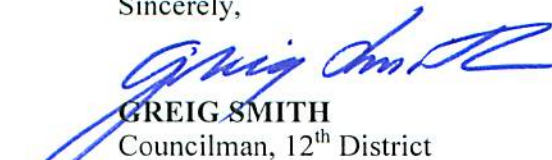
- The development - with a minimum of 5,800 residences - will be twice the size of Ahmanson Ranch on one quarter of the land;
- The development lies at the confluence of five of the nation's busiest freeways - the I-5, I-210, SR-118, I-405, and the CA-14;
- Traffic impacts along all major corridors throughout the Valley will be greatly increased
- The development, on unimproved, uninhabited, and unincorporated *County* land would require the grading of 20 million cubic yards of extremely mountainous terrain.
- Services ranging from police, fire, paramedic, tree trimming and other vital programs for Valley residents could be further depleted having to service a remote development that's difficult to reach.

Simply put, this development is a tsunami of sprawl. It is too big, too dense, and in the wrong location. The impacts of the proposed Las Lomas development are simply impossible to mitigate.

I urge you to read and share the attached white paper with your Neighborhood Council board members and immediately take an official position in opposition to the Las Lomas Development at your next scheduled board meeting.

Thank you for your hard work and dedication to the community, and thank you for your consideration. If you have any questions, please contact my Chief of Staff, Mitchell Englander, at 213.473.7012.

Sincerely,


GREIG SMITH
Councilman, 12th District

P.S. Please send me a copy of your official position so I can share your opinion with my Council colleagues.



A WHITE PAPER ON The Proposed Las Lomas Development Project

By Los Angeles City Councilman Greig Smith

September 10, 2007

First there was Ahmanson Ranch, now there is Las Lomas – twice the size of Ahmanson on 1/4 the land. Though touted as so called “smart growth,” to the contrary, the project seeks to construct somewhere between 5,800 to 9,670 residences (depending on which documents the developer is using at the time), more than 2,000,000 square feet of commercial, recreational, and community development services on terrain where 60% of the land has a slope greater than 50%, with grading expected to reach 20,000,000 cubic yards. It lies at the confluence of five of the nation’s busiest freeways, including the I-5, California 14, I-210, I-118, and I-405, currently averaging 230,000 vehicles daily. Gridlock is so severe, a federal study has been commissioned to look for ways to fix existing conditions, without considering further impacts from additional development.



Las Lomas began more than half a decade ago, when developer Dan Palmer approached the City of Los Angeles (after learning that the County would only allow 247 homes), with his grand idea to build a small city on approximately 555 acres of extremely mountainous, uninhabited land in an unincorporated area of Los Angeles County. The property begins at the southern boundary of Santa Clarita, and extends in a linear fashion southeast toward the City of Los Angeles. It was obvious from the very beginning that Las Lomas was going to be complicated, not only requiring extensive environmental review involving numerous governmental agencies, but also requiring a major change to the boundaries of the City of Los Angeles.

The developer consistently tries to portray this project as self-contained, with all necessities and amenities available on site. Knowing there would be incalculable mitigation measures needed to deal with the resulting enormous environmental impacts, he says the project would fund all those mitigation items and no burden would be placed on the taxpayers in that regard. Nothing is further from the truth.

In February 2002, the Local Agency Formation Commission (LAFCO), the state agency responsible for all boundary adjustments that would preside over the annexation, was notified. Simultaneously, the City of Los Angeles began working with Las Lomas under the expectation that a complete project would be filed. In December 2006, LAFCO rejected and returned the application to Las Lomas for failure to provide the necessary documents to proceed. One of the

major items lacking was proof that there was a direct connection from the Las Lomas property to the City of Los Angeles, which is mandatory for annexation, under state law. Also to date, Las Lomas has failed to file an application with the City of Los Angeles.

On July 11, 2002, a public scoping meeting was held to elicit comments for a future environmental impact report (EIR). The development was to be a mixed-use community with:

- Somewhere between 5,800 and 9,670 dwelling units
- 2.3 million square feet of Office/Research & Development
- 250,000 square feet of Community Facilities
- 225,000 square feet of Retail
- A 300-room hotel
- Various other community and recreational facilities
- A wastewater treatment facility, water tank, and series of pump stations to aid in the flow of sludge and sewage against the normal slope of the land.

Over the next five years no substantive progress was made on the project. However, articles about it continued to be written, and the developer promoted it with huge financial support to local chambers of commerce, advocacy organizations and business groups. But a comprehensive package for the project was never produced. Nevertheless, myriad problems with the proposal became apparent, many of which involved traffic.

- TRAFFIC -

Traffic studies submitted to and rejected by the City of Los Angeles Department of Transportation (LADOT) in December 2004, July 2006, and December 2006 do not support Las Lomas' claim that their mitigations will improve traffic conditions. Analysis conducted



by LADOT uncovered numerous deficiencies. All of the studies shared major common flaws, which included:

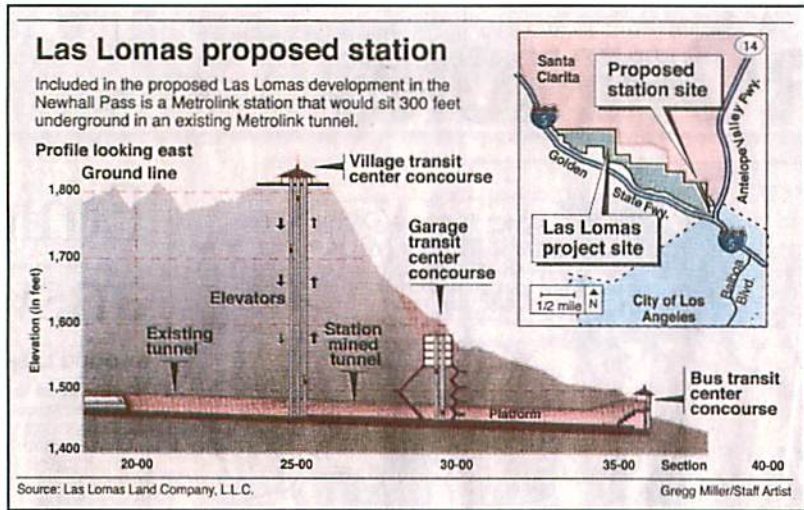
- Underestimating the number of vehicle trips they would generate
- Distributing the trips incorrectly
- Under-counting the number of impacted intersections
- Reducing the extent of the development's impacts by taking credits they did not deserve.

Significant issues involving Las Lomas' impacts to the freeway system still remain, including everything that would relate to the new ramps they anticipate constructing. Caltrans, the state agency that has jurisdiction over freeways, has asked for more data to determine these serious project impacts. This includes data on the proximity of proposed new interchanges added to existing interchanges.

Also, Federal Highway Administration (FHWA) approval is needed in order to construct any new freeway ramps. Las Lomas has failed to obtain this approval. Their proposed new freeway ramp on the I-5 adjacent to the project stands an unlikely chance of approval from the FHWA. Additionally, the sources of funding for the improvements have not been identified.

As referenced above, some of the credits the developer tried to take were for specific proposed “mitigation measures” that were speculative, had no proof of funding, had both feasibility and safety questions, and had not been accepted by the agencies that have control over them.

The developer’s proposed Metrolink station, to be located on the Las Lomas site, is a perfect illustration of how farfetched his proposal is. The design submitted by Las Lomas shows the Metrolink train stop to be cored through a mountain 300 feet beneath the station itself, with a 30-



story elevator providing the access to the station. The tunnel, where passengers would board, alight, and wait for trains, is a route that services and will continue to accommodate freight as well as commuter trains. A station located there sets up a serious potential for passengers who are waiting to board trains in the tunnel exposing them to diesel fumes. Among the engineering concerns raised is the need to protect waiting passengers from the diesel

emissions and pollution from the trains. In an August 13, 2007 Daily News article, Denise Tyrell, a spokeswoman for Metrolink, who has seen sketches but no actual plan, stated, “We’ve never seen anything quite like what they’re proposing; it’s quite unusual...there is no such station in the United States.”

Additionally, in order to accommodate the private vehicles expected to utilize the station, a massive parking structure would need to be constructed. In short, constructing and operating this station may sound like a good idea on the surface, but actually raises serious questions about safety, engineering, practicality, maintenance, cost, and usefulness. As summed up by Sergio Valdez, City of Los Angeles transportation engineer, in a December 26, 2006 memo, “The cost and physical feasibility of this Metrolink station being built has not been determined and must be further investigated before this alternative can be considered feasible.” Dr. James E. Moore II, a transportation engineer and professor of civil engineering and public policy management at the University of Southern California stated, “My prediction would be...it is prohibitively expensive to do this.” He didn’t guess the price, except at “zillions” of dollars.

Bart Reed, Executive Director of The Transit Coalition, a Southern California land use and transportation planning nonprofit, estimated that the cost to construct an additional tunnel, a station and a deep rock elevator system could be as much as \$550 million, based upon costs to build the Universal City Metro Rail station and boring under the Santa Monica mountains. “The cost to provide modern safety evacuation systems, earthquake protection, air purification and diesel fume removal systems would be a significant engineering challenge at a huge capital expense,” said Reed.



The developer's proposed re-connection of Sepulveda is yet another unfeasible mitigation measure. As currently constructed, Sepulveda is separated by the 405 freeway. As part of the improvements for the area, Las Lomas said they would re-connect Sepulveda. In order to achieve this, they submitted a plan that shows the connection being made via a fly-over, which crosses land belonging to the Department of Water and Power (DWP). DWP objects to the fly-over due to Homeland Security concerns, since one-half of the drinking water for Los Angeles residents is stored on this property. Although Las Lomas originally said they would pay for the construction of the improvements, they have since reneged and said they would pay their "fair share," which equates to a mere 35% of the cost of the fly-over. Then Las Lomas came up with a figure of \$30 million in total traffic mitigation they said they would contribute. Reed estimates that 10 lane miles of road through the Newhall Pass to Rinaldi St. along with flyovers and interchanges are well above \$500 million based upon current Caltrans figures. Some of the needed road work would involve cutting into shear granite walls adjacent to San Fernando Road and Foothill Boulevard and constructing massive retaining walls. This is a substantial engineering obstacle and will be prohibitively expensive. With that actual projected cost, the developer's proposed contribution is grossly inadequate.

Los Angeles Times

Increased Traffic Problems April 12, 2005

A 2004 study by the Metropolitan Transportation Authority concluded that growth in the north county would require \$5.4 billion in improvements. The Southern California Association of Governments estimated that commuters on the I-5, who now travel an average of 26 mph during rush hour, would otherwise be slowed to 11 mph, while commuters on CA-14 could see their rush-hour drive slow from 18 to 9.5 mph.

- SEWER CAPACITY -

Lack of sewer capacity is another critical issue facing this development. Creating what would essentially be a small city, especially one in an uninhabited area, raises serious questions about sanitation.

When the developer asked the City of Los Angeles Bureau of Sanitation and the Bureau of Engineering what the potential capacity and location of sewer outlets would be, they were informed there are no existing sewers in the area, and there are capacity constraints in the sewer system downstream from the development and in the treatment systems at the Tillman Water Reclamation Plant. As a means to bypass this, Las Lomas proposed a new on-site sewage treatment facility. This was rejected by Sanitation due to difficulty acquiring the necessary approvals, engineering the facility, as well as operating and maintaining a small, remote treatment facility.



While Los Angeles may have enough water for its current population, there is no way to predict what shortages may be coming in the very near future. We

are already being warned about impending shortages. Even with ample water, the main concern remains – without the sewer capacity, the residents of this project could not flush.

- SUSTAINABILITY -

Other problems arise in connection to the developers claims that their so-called “urban village” will be self-contained and self-sustaining, and have all the necessities provided on site.

By the developer’s own admission, they have said it will take at least *one generation* before this can happen. In a March 2005 “Planning Report” interview, the developer said he anticipated that the project would generate 22,800 jobs with approximately 9,000 being permanent to service the more the 15,000 anticipated new residents. Even a cursory examination of these numbers shows they do not support his claim. Further, there are no phasing mechanisms to guarantee job production stays current with housing unit production. With build-out expected to take 20 years, the jobs could be a very long time in coming. Even today, nearly 60 percent of Santa Clarita residents commute to jobs outside their valley. With the area’s population booming, the job-to-housing balance is expected to become more uneven as many new residents commute to jobs in Los Angeles, according to the Daily News.

“We need to think as a region how we will accommodate this growth in ways that won’t overwhelm the transportation system and will preserve the quality of life”

-- Peter Brandenburg, Senior Planner for Southern California Association of Governments, which represents 187 cities in six counties.

Finally, studies have shown that even if jobs are eventually created, there is no way to force people to work near where they live. Job availability on site will not guarantee that the residents and workers will remain on site.

- MEGA DENSITY -

Depending on which document you read, the developer is proposing a minimum of 5,800 homes



on 555 acres of steep mountain terrain with an active earthquake fault that transveres the site. Early claims suggest the developer will set aside nearly half the property for open space. Assuming that equals 200 acres

of open space, that leaves 355 acres of buildable land. **15,000 residents spread across 355 acres would be 42 people per acre versus the San Fernando Valley’s current average of 10 people per acre.** That doesn’t account for the proposed 2.3 million square feet of commercial space, all of the roads, sidewalks, backyards, schools, performing arts cultural center, fire and police stations, the water storage and treatment facility, recycling and waste yards, or the 300-room hotel.

- ENVIRONMENT -

This development is proposed for property where 60% of the land has extremely steep slopes that are at more than a 50% grade, and the developer predicts it will be necessary to grade 20 million cubic yards of dirt in order to build.



Grading of this magnitude will create significant impacts, which include destroying the sensitive Rim of the Valley Wildlife Corridor, killing thousands of mature trees, and causing a permanent detrimental visual impact on a significant scenic vista along the I-5. The impacts of this project are so onerous, the Sierra Club's official position, adopted on September 26, 2004, was to oppose the project, stating, in part, "The Las Lomas proposal significantly alters the landscape that wildlife relies upon. This mountainous property with slopes of 50% or greater means that the developer would have to grade off mountaintops."



"This project would increase air pollution significantly by adding tens of thousands of additional daily vehicle trips to an overly congested area, and would add up to an hour more of traffic delays in each direction. Many of the proposed features are unfeasible. The hilly topography makes planned bicycle and pedestrian trails impractical. Access to the project area via bus or train is non-existent and geographically prohibitive.

There is a great need for additional housing in Southern California, but extending sprawl into a major wildlife corridor, dressed up with faux smart-growth features that are impractical and unfunded by the developer, seems to be more of the problem rather than part of the solution."

- SEISMICALLY ACTIVE AREA -

Finally, all of this development is being proposed in a very seismically active area. During the 1971 Sylmar earthquake, Interstate 5/ Highway 14 interchange experienced the collapse of major bridges and other overpasses. Lives were lost.

The area experienced a greater shock during the 6.7 magnitude Northridge Earthquake in 1994, which saw homes destroyed ranging from Reseda, Northridge, and Granada Hills in the San Fernando Valley to Stevenson Ranch in the Santa Clarita Valley - and again the collapse of that same freeway overpass. In referring to this area, commonly known as the Newhall Pass, Tom Heaton, a professor of engineering seismology at the California Institute of Technology in Pasadena, has identified it as one of the nation's most active seismic areas for the last 40 years. One must take this into consideration when contemplating creating a new city that would lie directly in the middle.



Second of 2 collapsed connector structures at I-5-SR 14 interchange.

