



Santa Monica Coalition for a Livable City

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December 17, 2012

TO: Henry Chu
Los Angeles City Planning Department
Via email: henry.chu@lacity.org

FROM: The Santa Monica Coalition for a Livable City ("SMCLC")

Re: Joinder in Objections of Westwood South of Santa Monica Boulevard Homeowners Association ("WSSM") and their attorney, John B. Murdoch, their traffic expert, Arthur L. Kassen as well as the objections of Ken Alpern and representatives of all of the other neighborhood associations regarding the Casden/Sepulveda Project (Case No CPC-2008-4604-GPA-ZC-HD-CUB-DB-SPR)

The Santa Monica Coalition for a Livable City ("SMCLC") is a non-profit group that was formed in 2005 to ensure that Santa Monica residents have meaningful input into the development decisions that affect them. (Please see www.smclc.net for a list of our activities and leaders).

SMCLC, like the many other community groups that have written to you or testified at the December 5th hearing objecting to this project, is **concerned** about the traffic gridlock that is increasing throughout Santa Monica and the Westside. This impenetrable traffic is the result of intensified building and the approval of too many large, individual projects reviewed in isolation, without fully accounting for the cumulative impacts of all existing, pending, and projected future growth. Once these projects are built, they have huge and irreversible impacts on traffic, open space and residents' quality of life. They also have negative impacts on nearby businesses whose accessibility is impaired by added congestion. And, in the case of the proposed Casden project, the shift of such a large light industrial site to mixed uses will serve to place significantly increasing pressure on the adjacent properties similarly zoned to be converted to mixed uses. Where then does West Los Angeles place its light industrial businesses so essential to the well-rounded character of a community? There can be no better location for such uses than to be "freeway-adjacent."

In Santa Monica, SMCLC successfully opposed a proposal by Macerich to add over one million square feet of new office, residential and retail space to the Santa Monica Place mall. This would have been the square footage equivalent of putting all nine of Santa Monica's largest hotels on this one site. Instead, Santa Monica Place was remodeled without adding additional square footage.

This massive Casden proposal, at nearly 785,000 square feet, is nearly the size of the defeated Macerich SM Place proposal. Its impact on traffic is well documented in the Final Environmental Impact Report (“FEIR”) in which it is estimated to generate 14,000 additional daily car trips – a traffic load that would be horrendous. It is no wonder that it is generating the same level of well-organized community opposition as the Macerich project.

If approved at this size, this project would degrade the quality of life for residents in and around the surrounding area, including Santa Monica. These unacceptable traffic impacts for Santa Monica and the Westside include some 22 intersections that cannot be mitigated to acceptable levels per the FEIR unless this project is substantially reduced. Anyone who has attempted to drive from Santa Monica to West Los Angeles on a weekday afternoon can attest to the already gridlocked situation on all major arterials. Getting past the 405 Freeway is a major challenge, deterring many who would otherwise travel west to east. Further, it is worth remembering that Sepulveda Boulevard, adjacent to the proposed Casden project, is a designated alternate route for the 405 Freeway. As such it should not be treated as “just another” city street.

It also plays a key role in times of major accidents and when the freeway’s operation is compromised. We are not convinced that the planned entrances and exits to and from the proposed project adequately take into account the current operation of Sepulveda Boulevard and the demands placed upon it by nearby commercial businesses and the general traffic patterns. We have similar concerns about the access to and from the project from Pico Boulevard. While the design of the entrances and exits may be adequate to move the traffic study’s number of projected vehicles in and out of the project’s driveways, the traffic study does not sufficiently address how those cars attempting to enter and leave the property will affect the traffic flow on Pico and Sepulveda. One must take into account the fact that traffic on Pico going both east and westbound during peak afternoon hours is gridlocked as it attempts to access the 405 northbound onramp on Cotner Avenue just north of Pico Boulevard.

We also agree with these serious deficiencies raised by the traffic analysis in the FEIR: 1) the developer overstated the baseline traffic counts by as much as 18% from what the most recent traffic counts done by the Department of Transportation (“DOT”) show, therefore misrepresenting the real magnitude of the impact of the additional trips the project would generate as well as mitigations; 2) cut-through traffic on adjacent neighborhood streets was not analyzed properly; 3) other projects nearby, including at 2900 Sepulveda and 3400 Pico which were not included. Santa Monica has a number of large-scale projects pending in the near vicinity between Olympic and Colorado and 26th

Street and Bundy which would be heavily and negatively impacted by this project without regional transportation planning and mitigations.

Unfortunately, this proposal, in its present form, shows no attempt by the developer to accept the known and serious infrastructure limitations or to work productively with the community to devise a better, smaller project. It's on a surprisingly expedited track as though the mere fact that it's next to a transit stop means it's Transit Oriented Development ("TOD"). You received ample testimony as to why, given the traffic impacts alone, it is TOD in name only. The placement of a proposed Target store at the site of an EXPO station is particularly baffling. As you may know, the City of Santa Monica carefully reviewed and rejected the locating of a Target store in downtown Santa Monica specifically because of the traffic it would generate in an already-congested commercial area. A Target store is not the type of business that one would consider to be an appropriate transit-adjacent business. It is a trip generator.

Furthermore, it is important to all those who live or work adjacent to the EXPO line to see that stations are properly developed to create good access and a positive ridership experience. It is essential to our Santa Monica riders whose final daily destination may be the Sepulveda station, that the interface between the EXPO stop and this property be well thought out.

For example, we believe that riders from Santa Monica would welcome a way to get to LAX that removes them from the Lincoln corridor traffic. If they could ride EXPO east and connect with the LAX Flyaway at the EXPO Sepulveda station that currently goes from Westwood Village to LAX, there would be significant benefits experienced on many north/south arterials in the Westside. Additional connections to an existing Amtrak bus and other transit could be housed at the Sepulveda station if plans were developed and needs analyzed BEFORE any project is approved for this location. We would suggest that METRO and the SM Blue Bus along with the Culver City Municipal Bus management have serious discussions about the needs for and ways to implement a Westside Transit Center now. This property has unique characteristics (and zoning) that should not be lost in the current effort to develop ill-placed residential density and inappropriate commercial development.

The current lack of integration between the project and station is clear. We heard comments at the hearing supporting the placement of transit-rider supportive businesses/services as well as the need to provide parking for those accessing the line from locations not well served by our SM Blue Bus, the Culver City bus line and METRO. It is overly optimistic to believe that all riders will come to the line via transit. There must be provisions for additional parking since we know that those constructing the line have not been concerned about parking nor have they analyzed the true parking needs

for those seeking to ride the line.

We are also concerned about why a project like this should precede adoption of the West Los Angeles Community Plan as a matter of sound planning. The proposed changes to the City's General Plan and the local WLA Community Plan do not meet many of the City's stated criteria for land use planning. As such, how can this project seek approval based upon "overriding considerations?"

For all of these reasons, SMCLC joins with all of the individuals, experts and other community organizations that strongly oppose the current proposal for the Casden project. If we can be of further assistance in discussing this matter with the City or the developer, we welcome the opportunity to do so.

Sincerely,

Diana Gordon and Victor Fresco, Co-chairs, SMCLC

Cc: Santa Monica City Council

David Martin

Rod Gould

Councilmember Bill Rosendahl

Councilmember Paul Koretz

Westside Neighborhood Leaders

Santa Monica Neighborhood Leaders