



## Pacific Palisades Community Council

*Serving the Palisades since 1973*

**We appreciate your time tonight.**

Castellammare Mesa Home Owners



# CRITERIA for an Environmental Impact Report

Kim Feder - President

A full Environmental Impact Report (EIR) is typically required for projects that have the potential for significant environmental impacts. Here are some good reasons why a full EIR might be necessary:

**Large-scale developments:** Projects that **involve significant land use changes**, such as the construction of large residential communities, industrial complexes, or commercial centers, often require a full EIR due to their potential to affect the environment on a substantial scale.

**Complex projects:** Projects with complex **environmental issues**, such as those involving multiple environmental factors (e.g., air quality, water resources, wildlife habitats) or intricate mitigation measures, **may necessitate a full EIR to comprehensively assess and address potential impacts.**

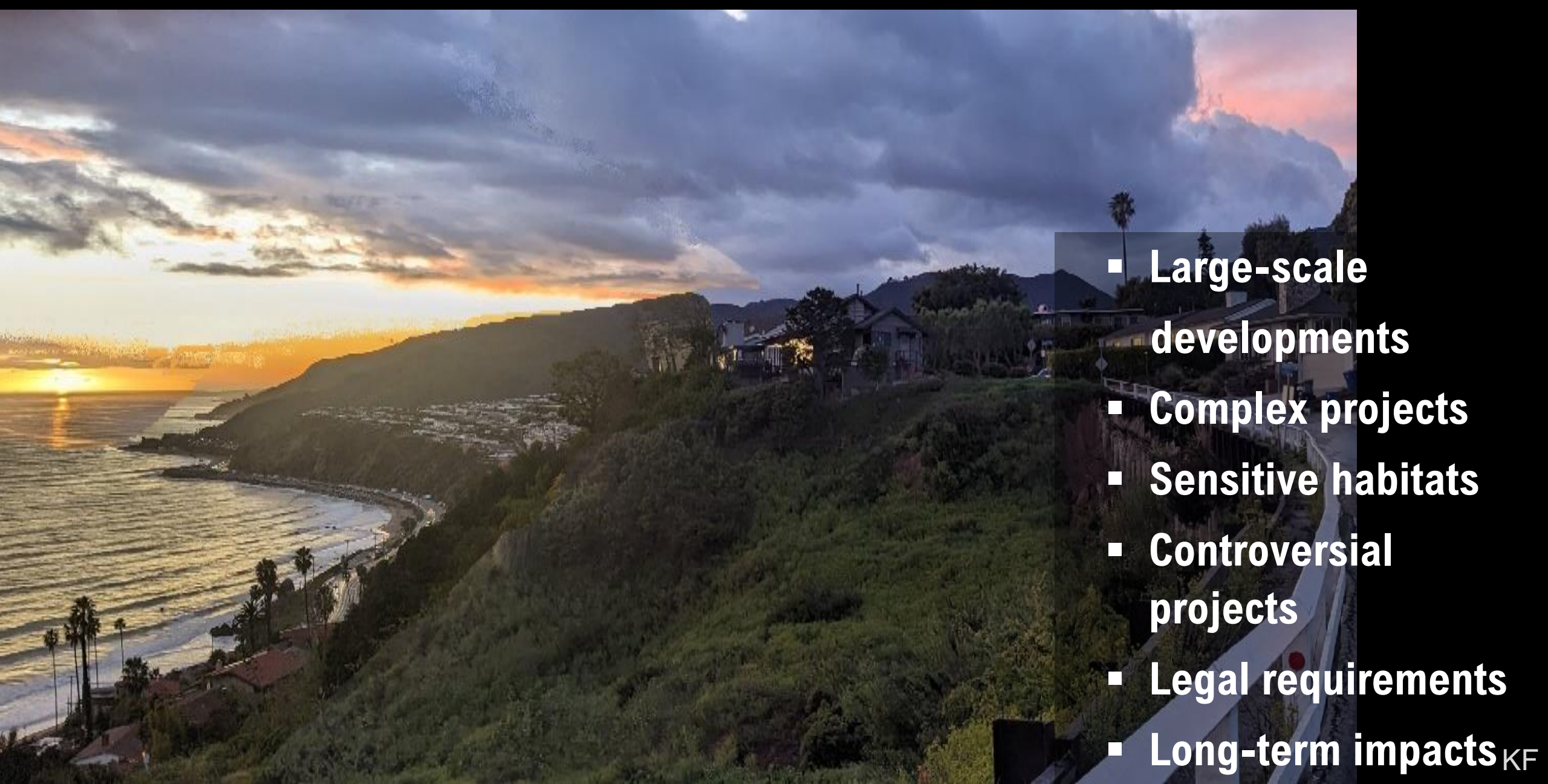
**Sensitive habitats:** Developments located in or near sensitive environmental areas, such as wetlands, wildlife habitats, or protected species habitats, often require a full EIR to evaluate the **potential impacts on these ecosystems** and to develop appropriate mitigation measures to minimize harm.

**Controversial projects:** Projects that are controversial or subject to public scrutiny may require a full EIR to provide a thorough and **transparent analysis of potential environmental impacts**, address community concerns, and facilitate informed decision-making by stakeholders and decision-makers.

**Legal requirements:** In many jurisdictions, certain types of projects are mandated by law to undergo a full EIR based on criteria such as project size, potential environmental impacts, or specific regulatory thresholds. Compliance with legal requirements is a key factor in determining the need for a full EIR.

**Long-term impacts:** Projects that are expected to have **significant long-term environmental impacts**, such as those related to air and water quality, land use patterns, or greenhouse gas emissions, may require a full EIR to assess these impacts comprehensively and develop strategies for sustainable development.

# CRITERIA for an Environmental Impact Report

- 
- Large-scale developments
  - Complex projects
  - Sensitive habitats
  - Controversial projects
  - Legal requirements
  - Long-term impacts<sub>KF</sub>

## City Responsibility

**Chris Ekstein**

The City of LA has a long history of neglecting Tramonto and Revello Drives damaged by active landslides.

The City has abandoned its responsibilities. Walked away from proper drainage and sewage systems. Walked away from maintaining the bulkheads of Tramonto and Revello.

Study after study has occurred on this particular slide: From the Moran Landslide Study of 1958, to the URS Stabilization Study in 2010. But for over 20 years – nothing has been done.

The hillside roads are broken and poorly maintained without a drainage system, the hillside saturates from landscaping and heavy rains and slides onto the PCH below causing mayhem.

Countless projects for new homes have been abandoned and the lots remain unusable. The city continues to avoid any responsibility of repairing these two important and tax-revenue generating roadways.

It can't be up to private constrictors to develop or repair city infrastructure on city right of way, that's a conflict of interest. Private over public good.

The city has already been found liable for tens of millions of dollars paid out to red-tagged homes damaged by the landslide. PCH is a hazard zone. A bicyclist recently was awarded over \$9M after being hit in the PCH while avoiding landslide debris.

Approving this project will expose the city to untold liability. It's not worth the risk.



# City of LA Neglect of Tramonto Landslide



**2004 - 2024 = 20 Years of Nothing Done**



CE



# City of LA



# Neglect of Castellammare Roads

In Castellammare our  
Roads are our  
Drains



Potholes  
everywhere.  
Water running  
constantly.



# City of LA Neglect of Castellammare Roads



**Revello is unsafe at any speed.**



**Open trench on the right.**



**Hazardous Roads on steep slopes is a recipe for tragedy.**



**Open fissures are not repaired nor their cause investigated**



# City of LA Neglect of Castellammare

## Abandoned Projects

This lot on  
Castellammare  
has been this  
way since the  
1990s

25+ Years





City of LA



# Neglect for Public Safety



PCH is already known as slaughter ally due to the very high number of vehicle-related deaths





# Noise

## Marcia Vogler

Noise and vibration pollution are often underestimated. This holds true for this Project's sound analysis report. In fact, the MND downplays construction noise, relies on incorrect source noise data, and omits off-site noise generation. Their report references average decibel levels. LAMC references maximums. Averages are several DB lower. DBs are measured logarithmically.

The Project requires approximately 300 piles. Boring uses an auger drill rig which is very loud. Approximately 3 piles can be drilled per day and will exceed LAMC permissible noise thresholds.

There is no quantitative analysis of vibration in the Project study. However, construction rollers, caisson drilling and loaded trucks will all produce ground borne vibrations that will be felt throughout the community. Neighborhood ambient levels will increase.

An EIR must be conducted.

**Note: Paseo Miramar home required only **5%** of the trucks proposed for Demos Phase 1**

# Noise & Vibration Click Link to View Video Example





# Hydrology & Drainage

**Mark Yoshitake**

I'm Mark Yoshitake, 20-year resident of the neighborhood.

I'm deeply concerned about proceeding with any development on this highly active slide, which just a few weeks ago slid again onto the Pacific Coast Highway. I'd like to point out, a notable aspect of the developer's scorecard is the supposed claim that the project would not substantially alter the existing drainage pattern, causing land erosion.

The Landslide Stabilization study by URS (commissioned by the City and Caltrans in 2020), found that a major cause of the Tramonto landside is subsurface groundwater trapped between layers of fine-sand. Further, the study clearly states that while additional subsurface drainage will "slow down" future landslide movement, it is not, I repeat, it is **not an option for residential development on a landslide**, and that additional structural support is required to meet safety standards.

This aspect is completely unaddressed by the developer's plans. Their proposal has no mitigations for surface or subsurface drainage, nor structural support plans to address hydrology, and is severely inadequate.

The City should not have approved a geological study with insufficient hydrology considerations, and I urge the City to require a detailed EIR for this project, and prioritize the safety of the citizens of this community.



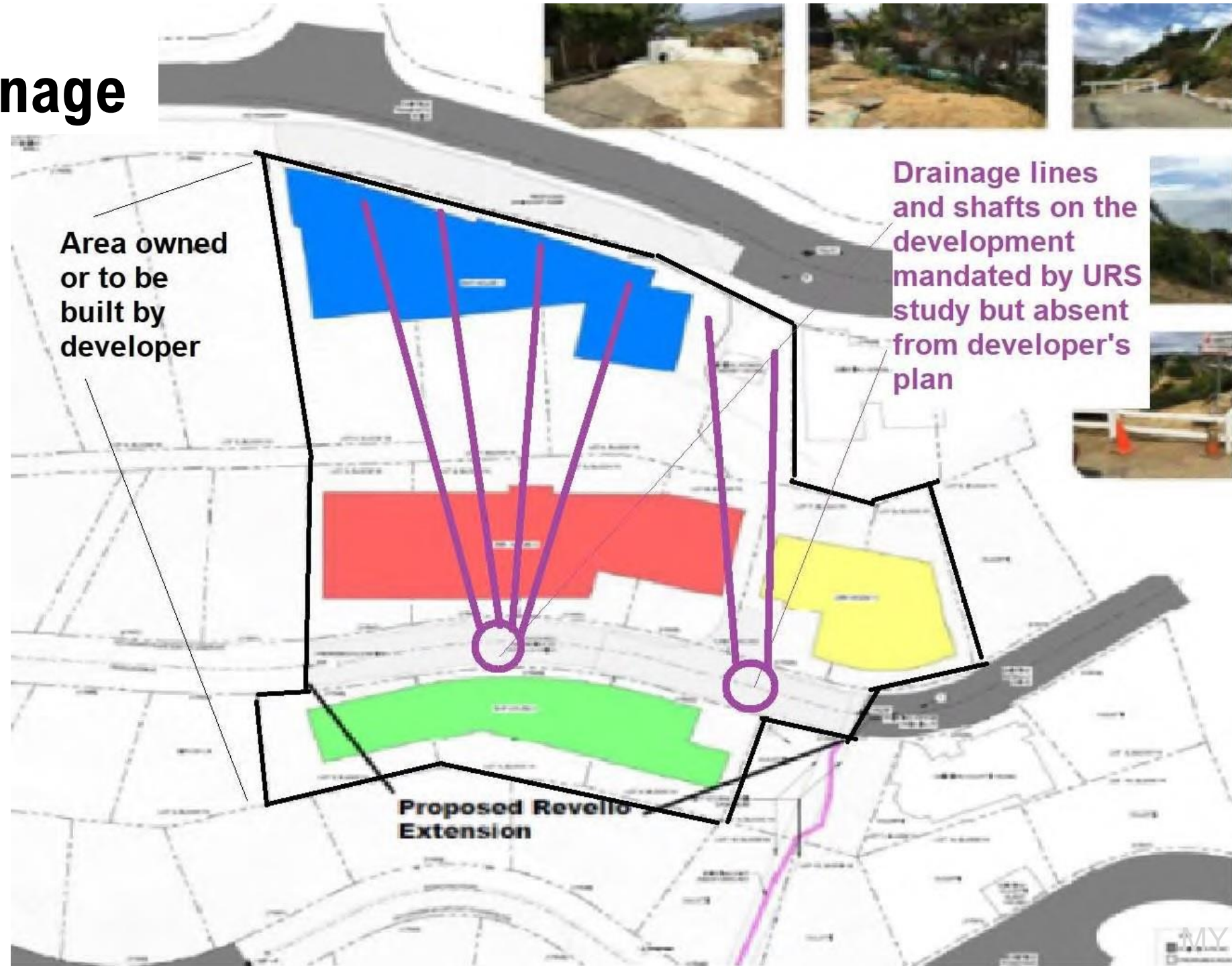
# Hydrology & Drainage



*Commenting on PCH lane closure in April 2024 a representative from Caltrans stated “That is actually a City of LA slide. And that has been moving for years. It has been determined by geologists that removing soil will make the issue worse, potentially spreading onto the entire highway and causing a complete shutdown of PCH.”*



# Hydrology & Drainage





# Excavation

# Cindi Young

I'm Cindi Young, I live adjacent to the Tramonto Slide and I'm very concerned about the excavation proposed for this project. The grading proposal calls for the removal of three times the allowable maximum per project site, ten times the limit of the City's Baseline Hillside Ordinance. The applicant contends that 94% of it is remedial. To reach that percentage, we discovered he wrote to LADBS inviting them to establish an Order to Comply on two lots which were not considered substandard. Excavation may keep the project safe but does nothing to stabilize the slide. The applicant's own geotechnical consultant Stoney Miller said, and I quote, "... there will still be the possibility of localized failures below and adjacent to the proposed development."

Four homes built on twelve lots in one of LA's most active landslides on top of the bones of homes which fell in the 1958 landslide. At the very least, this proposed development should require an EIR.

# Excavation



**Average dump truck  
holds 14 cubic yards of soil.**

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**Project calls for removal of  
33,794 cubic yards  
That's about**

**2,414**

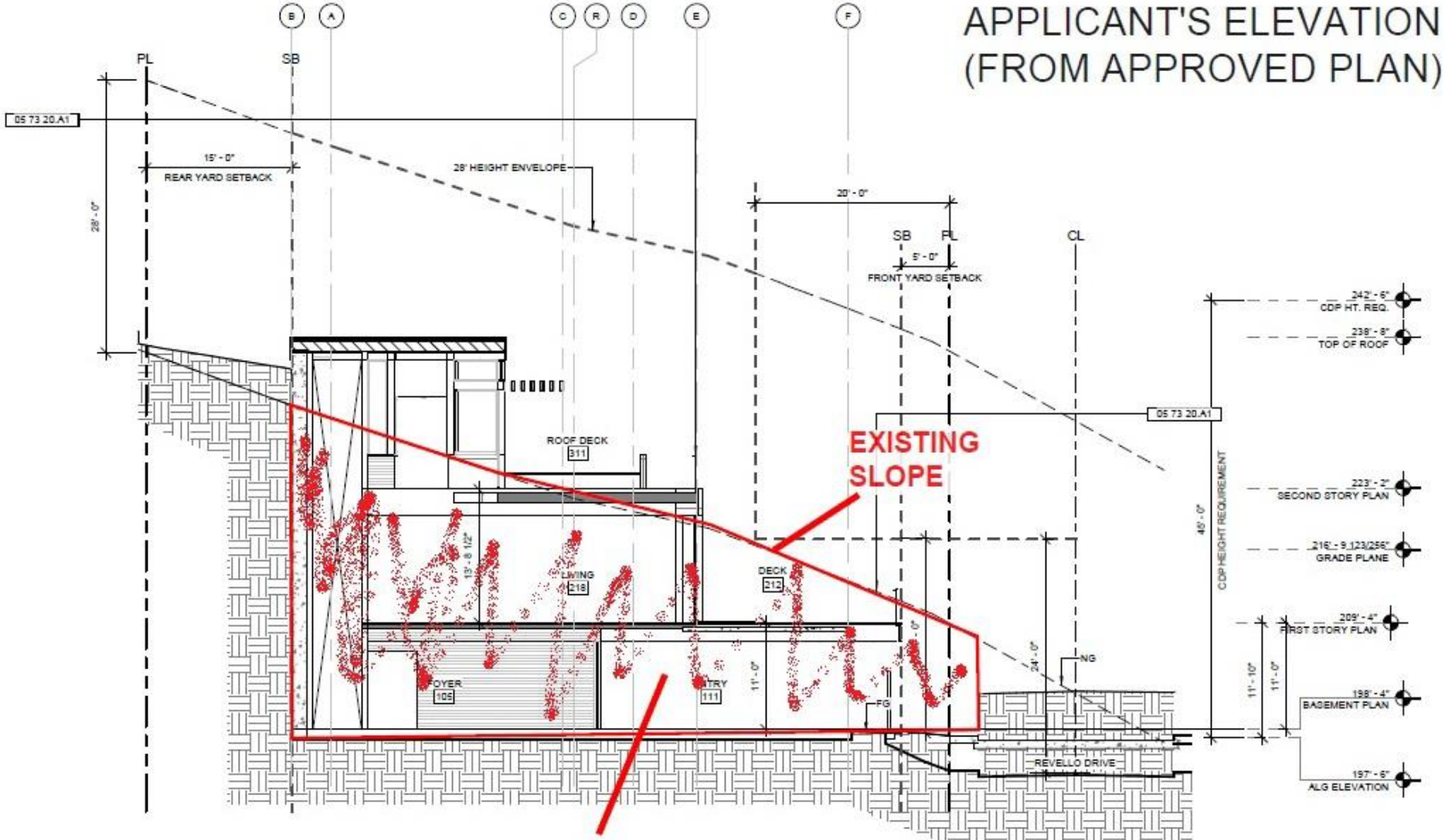
**Truckloads x 2  
4,828-6,000 in and out**

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**50,000 lbs. per Truckload**



# Excavation



2 CROSS SECTION  
SCALE 1/8" = 1'-0"

SOIL BEING REMOVED TO CREATE HOUSE PAD

VIRTUALLY ALL OF THE SOIL IS BEING REMOVED TO CREATE A HOUSE PAD AND IS THEREFORE NOT REMEDIAL GRADING

# Excavation

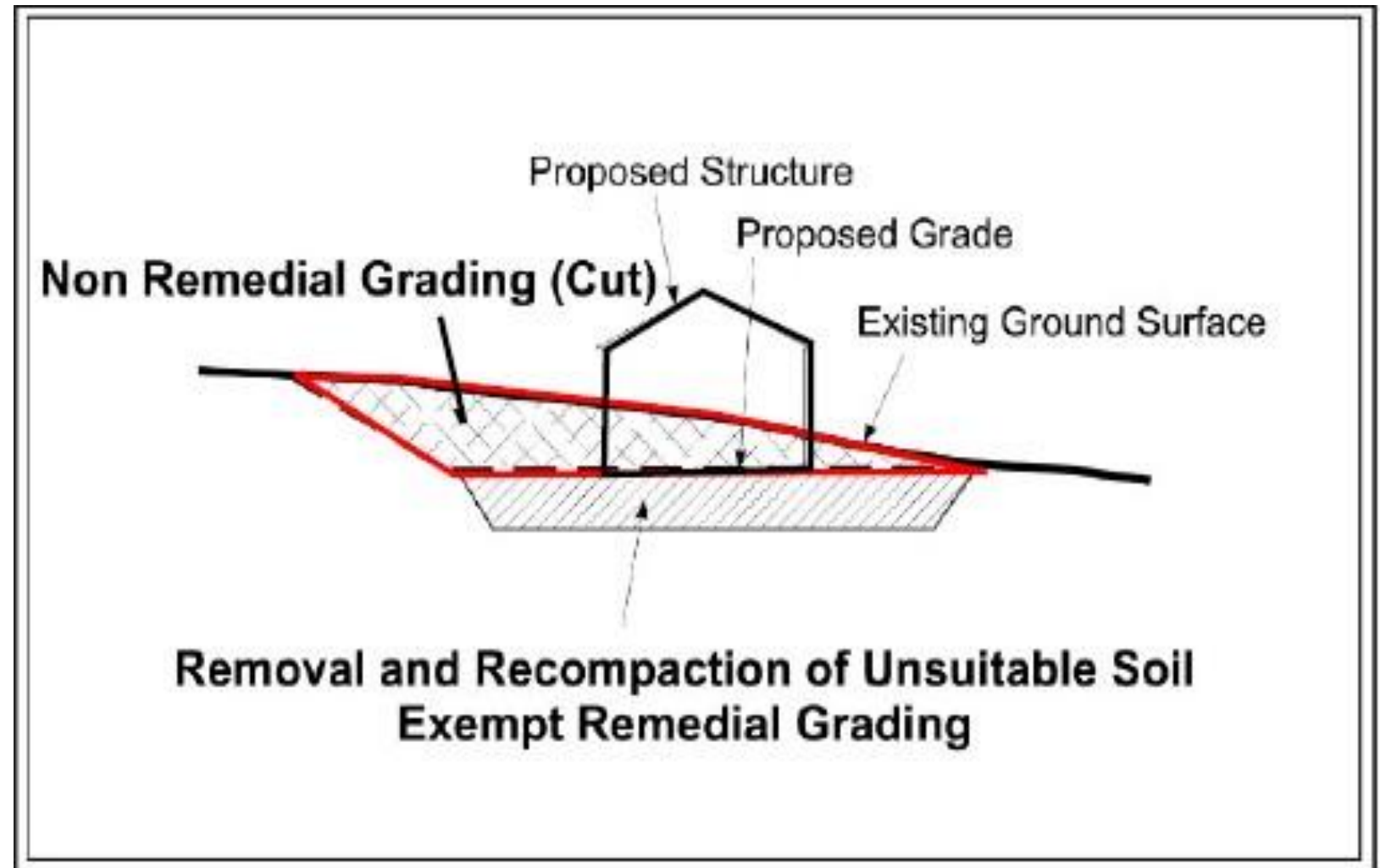


Figure 1

# Biological Impacts

## Michele Shafroth

Hi This is Michele Shafroth - I live at 247 Quadro Vecchio Drive - Pacific Palisades CA

This project poses adverse environmental impacts on biology, the impacts of which have not been analyzed or mitigated in the MND, and the project site has already been subject to unpermitted disturbances, as identified by Coastal Commission Staff.

The site is home to Monarch Butterflies (rare species under CEQA guidelines), the western mastiff bat and nesting birds, and Lemonade Berry Scrub, a plant with a rarity ranking of S3.

The impacts on these plants, animals and insects have not been analyzed or mitigated in the MND. Further, the MND fails to analyze environmentally sensitive habitat areas, which Coastal Commission says may exist on the site.



# Biological Impact





## Bulkhead Risk

**Mo Sahebi**

Mo Sahebi, civil engineer

The drilling operation for the proposed superficial piles against this dilapidated bulkhead built hastily on emergency basis 54 years ago will be perforating a portion of the slide. That would intensify its failure risk and potentially destabilize the westerly flank of the slide, subjecting 100s of residence to unwarranted risk of losing their primary means of access to their homes, with no plan B.

The proposed driveway within the public right-of-way is in gross violation of LA City Municipal Code Section 12.21.A.4.(h) that states “Such access driveway shall be located entirely on the lot which it serves.” and is against the City policy requiring frontage street improvements consistent with LA City Mobility Plan 2035 standards.

123 Words





# Tramonto Bulkhead Risk



# LA's Broken Promise

**Kim Feder**

The condition of the existing bulkhead is deteriorating, and the City of LA is divesting itself of the responsibility of the necessary repairs. If this bulkhead fails, the community is left with one road in and out and no easy access for long fire trucks. Building houses in front of the bulkhead will neither strengthen it or enable the City of LA or Caltrans to replace it as was promised in 2005.

*In 2005, Councilwoman Cindy Miscikowski was quoted as saying "the city is planning to replace the bulkhead, which consists of dated concrete pylons that currently support Tramonto. Design plans are expected to be ready by June, with the work to begin by next January 2006.*

When it rains, water fills the potholed street of Tramonto which is then absorbed into the bulkhead which continues to weaken and feed water to the landslide below

**Has the City of LA abandoned the promise replacement? This project will prevent it!**



# Tramonto Bulkhead Neglect for almost 20 Years



***In 2005, Councilwoman Cindy Miscikowski was quoted as saying "the city is planning to replace the bulkhead, which consists of dated concrete pylons that currently support Tramonto. Design plans are expected to be ready by June, with the work to begin by next January 2006."***



## Toe of the Slide on PCH

**Carmen Kallberg**

As a result of the recent winter storms, the toe of the active landslide known as the “Tramonto Slide” has slid down on to PCH. The right northbound lane is closed due to landslide debris covering the road. The closure of this lane is causing a traffic nightmare on an already congested highway. The proposed development is located at the very top of this active slide. CalTrans has advised that the unstable nature of the slide requires that repairs start from the top of the active slide. The City of Los Angeles has jurisdiction over the entire area and must stabilize the slide before CalTrans can continue with repairs to the toe on PCH.

The developer’s MND indicates that the only portion of the slide that will be stabilized are the parcels on which they build the homes. Therefore, the balance of the slide remains active. In 1958 the Via de las Olas Landslide in Pacific Palisades closed PCH and drew the City of Los Angeles into costly litigation. NOW the City is divesting itself of responsibility by selling substandard lots within the Tramonto Landslide to a developer who plans to build without the benefit of an EIR. This is another accident waiting to happen.

With enough rain, Tramonto slide could force a total closure of PCH if the entire slide is not addressed top to toe. The 1959 Via de Las Olas Landslide closed PCH and drew the City of LA into costly litigation.



# Toe on PCH is a serious traffic hazard, April 2023





# Toe on PCH is critical to slide stability, April 2024





**With enough rain, Tramonto slide could force a total closure of PCH if the entire slide is not addressed top to toe.**



“In 1958 the Via de las Olas Landslide in Pacific Palisades closed PCH and drew the City of LA into costly litigation.



# Transportation

Kim Feder

Kim Feder, of Castellammare. Expert Transportation Study concluded.

- AN EIR is REQUIRED – We are facing Potentially Significant Impact TO Emergency RESPONSE AND Evacuation in a VHFHSZ....

**Mindy Payne on Revello was told by an LAFD fireman "you will be out of luck" when she asked about the risk of access for fire trucks when construction vehicles are present.**

- Not less than significant in MND

- 1) Heavy trucks/equipment are incompatible with our narrow roadways. We will have increased ROAD hazards AND blocked roadways.

- a.MND estimates 6800 truck trips hauling dirt - MND does not include workers' vehicles, material delivery, trailers hauling heavy construction vehicles

- 2) We will have Inadequate emergency access/exit

- a. Two Outlets 300+ homes - Porto Marina and Los Liones

- b. Porto Marina is effectively one lane unusable for large trucks.

- c. Los Liones is our only two-lane access/exit road and the only access for trucks A picture of heavy equipment being transported up Los Liones. COMPLETELY BLOCKED.

- d. This is a Very High Fire Hazard Severity Zone (VHFHSZ). Construction activities will IMPEDE ACCESS, DELAY RESPONSE TIMES and IMPEDE EXIT

- e. We have streets less than 24 feet – inconsistent with the MND.

While PCH is partially closed, WAZE diverts PCH traffic through Castellammare.



# Transportation And Fire Risk



The fire department was up here one day, and they were unable to make the turn due to a car parked in the red. I mentioned it was an ongoing problem and we are concerned about what's going to happen when there's a fire.

**The fire fighter said...  
"you will be out of luck."**

Mindy Payne  
*Resident on Revello Drive*



# Transportation And Fire Risk

Trucks & Earth  
Equipment are  
Incompatible  
with our  
Narrow  
Fragile Roads

*Right:  
Tramonto Dr. in  
Castellammare*





# Transportation And Fire Risk

Trucks & Earth  
Equipment are  
Incompatible  
with our  
Narrow  
Fragile Roads

*Right:  
Crane delays  
Traffic for hours  
on lower  
Tramonto Drive*





# Public Services

**Flora Cordic**

The Revello Road pinch point must be upgraded to current California Fire safety code standards. The dense population of residents, high-rises, and city cultural centers in the adjacent area requires it.

The pinch point is 150 feet from a 6-story highrise, 53 unit, One Coast Condo complex, on Tramonto which opened in June 2023.

Revello Road is one lot away from Ocean Woods Terrance Complex, a 4-story highrise with 36 condos.

Adjacent is the Palisades Jewish Early Childhood Center and Chabad of Pacific Palisades, with 100 children ages infant to 5 years old are on the campus daily.

Across the street is Westside Waldorf School with 300 children ages 5 to 11 years old on campus daily.

This cultural/city public services are dependent on the Sunset/ Los Liones intersection, Revello and Tramonto Roads for fire/emergency services. This is where the construction traffic will pass through. None of this is in the MND under public services. We demand an Environmental Report.

176 Words

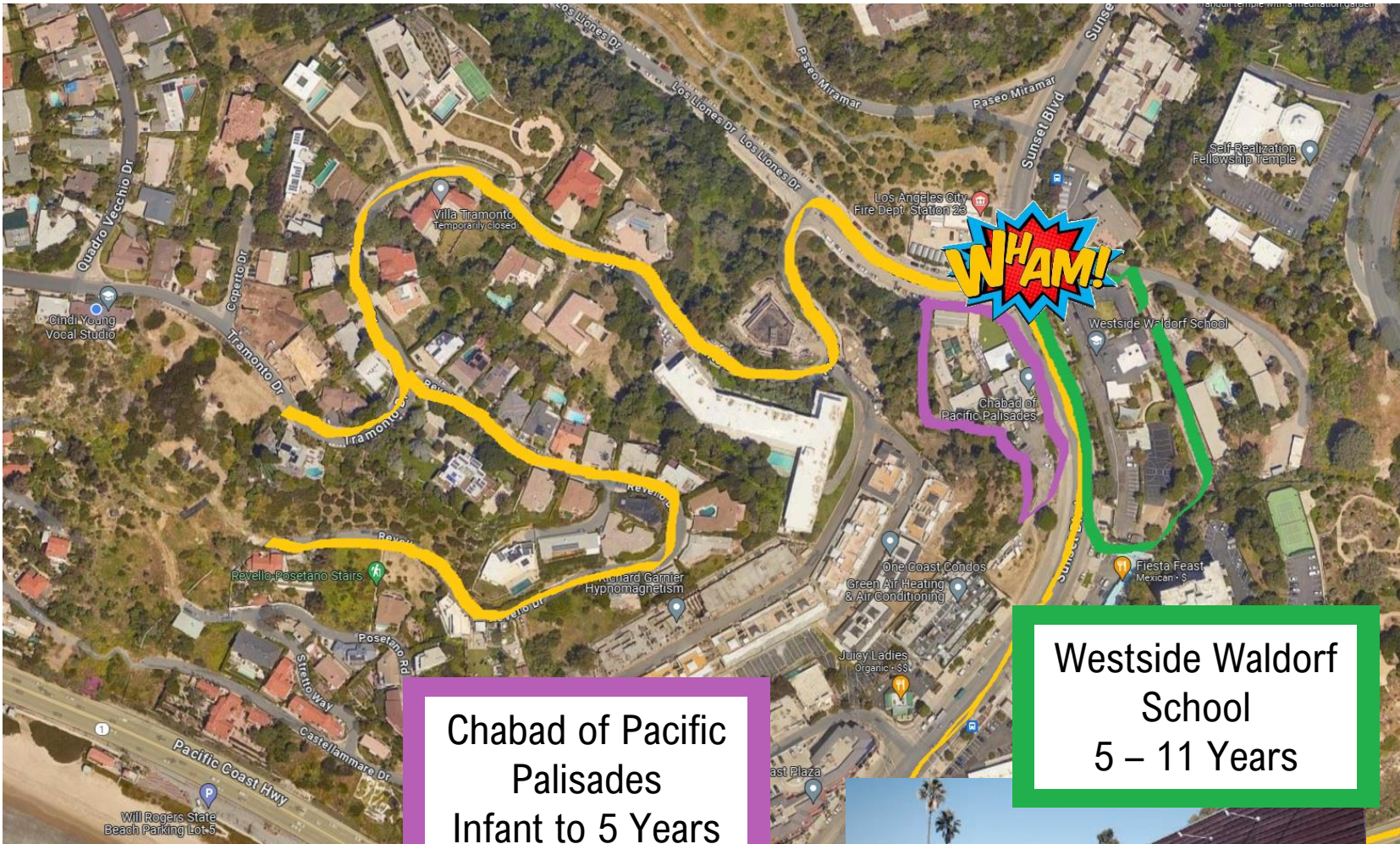


# Public Service: Huge Trucks on Narrow Roads Endanger Condo Residents





# Public Service: Huge Trucks on Narrow Roads Endangers 400 School Children



Chabad of Pacific Palisades  
Infant to 5 Years

Westside Waldorf School  
5 - 11 Years





# Land Use and Planning



The coastline and white-water view from the bulkhead above the Tramonto Landslide is a geological feature that will be destroyed as a result of the proposed RTP development. Members of the neighborhood as well as visitors from all over the world come to see a beautiful unobstructed sunset from this location.



# LAND USE AND PLANNING

**Rossi Venkov**

Rossi Venkov, Posetano Rd, about 400 feet from the project site, an area severed by the Tramonto slide, with only one outlet to Sunset Blvd.

As evident in our submittals, the Project is in conflict with State and Local Land use and Planning regulations. It does not minimize grading, nor preserve the natural topography or vistas and will be detrimental to the community's safety and future development. Its scope is incompatible with the damaged, inadequate streets and once built will prevent the city from restoring and reconnecting them as they were planned. The road width deviation requested is currently applied for by 3 other projects past the Revello pinch point. The cumulative impact will be a traffic and emergency access nightmare and endanger life and property.

An EIR is absolutely necessary to properly evaluate the project and clarify planning priorities. Providing 4 luxury housing units should not precede restoring infrastructure and establishing and maintaining safety and access for all residents and land owners.



# Aesthetics

Ivo Venkov – 1 minute statement

## CEQA APPEAL 1 minute AESTHETICS +

Ivo Venkov, licensed architect, on behalf of the lower Castellammare.

The proposed development and its aesthetics are incompatible with the general Zoning intent of the LAMC, the BHO and violate the CCA 30251, 30253 (a) (b) (c) (d). It would have a serious, possibly negative environmental impact which has to be studied in an EIR. In fact, the entire MND fails to mention the California Coastal Act or the Dual Jurisdiction Coastal location, and the CCC is not listed as a public agency, who's approval is required. The development sizes resemble medium residential hotels, out of scale with the neighborhood, the public views from the proposed Revello extension are blocked by a 200' uninterrupted building facade, where typical homes are ~50' wide.

Said extension creates a major landform modification, a 2-story retaining wall in the middle of the street, cutting off access for adjacent land owners and preventing future re-connection of the road - the impact would be significant.



# Aesthetics





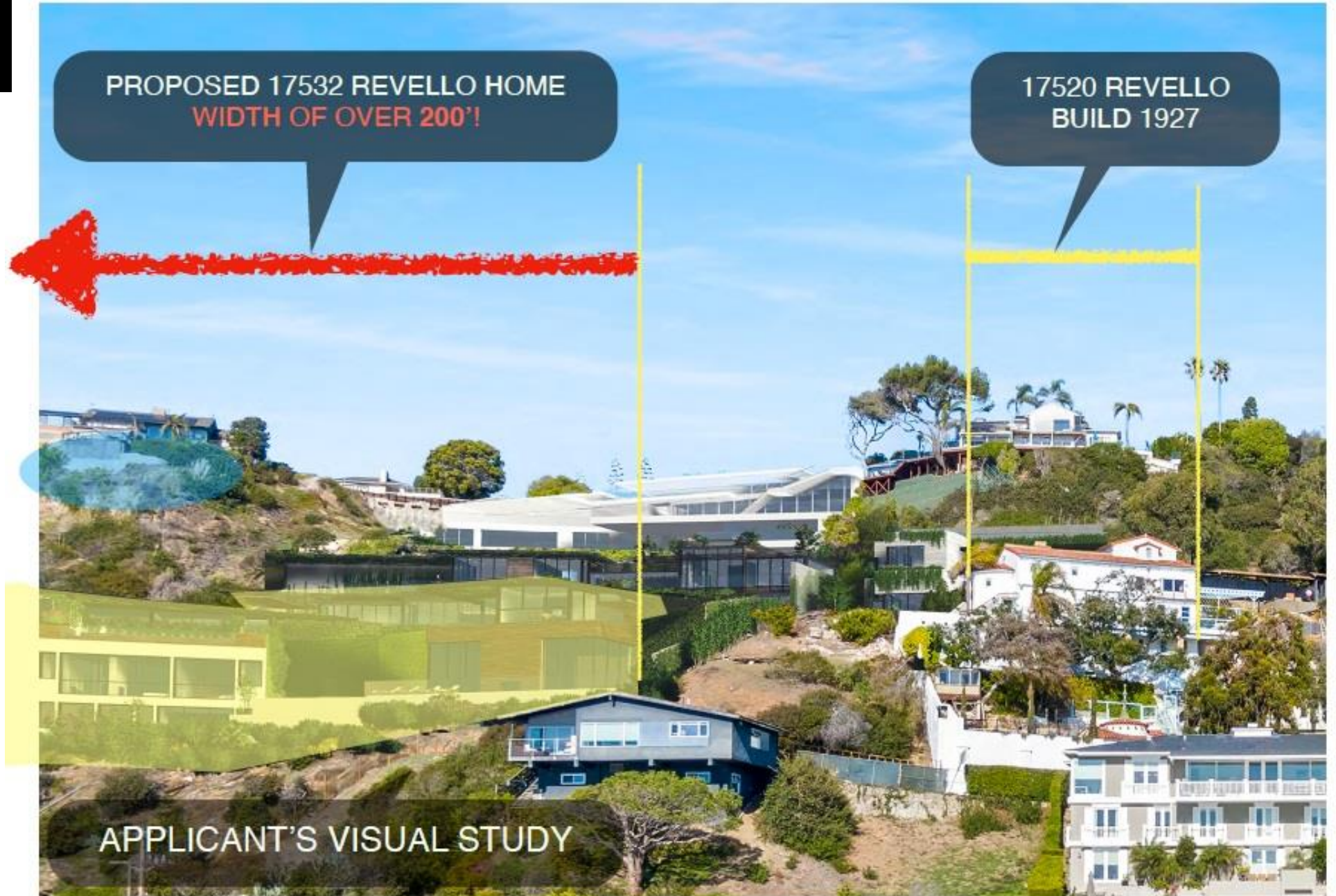
# Aesthetics



**SINGLE FAMILY HOME VISUAL COMPATIBILITY IN R-1 ZONE**



# Aesthetics





# Aesthetics



**SINGLE FAMILY HOME VISUAL COMPATIBILITY IN R-1 ZONE**



# No Haul Route

Bart Young

Although the Haul Route has not be formally defined yet, there are only two roads.

Dump trucks, cement mixers and other heavy equipment accessing the construction site from Tramonto Drive will demolish the flow of traffic as well as the stability of the road and the bulkhead. At a sub-standard width of 22 feet at the Bulkhead, it is currently dangerous for two cars to pass. With heavy trucks it will become an impossible pinch point endangering walkers, children, pets and construction workers all trying to squeeze through a very narrow roadway.

Revello narrows to 12'3"wide with a 12 foot drop that makes it difficult for a passenger can to travel safely.

## The Need to Limit Building in Sensitive Areas

The Brentwood-Palisades Community Plan cites the need to limit building in geologically sensitive areas, limit grading in hillside communities, and avoid structures that are out of scale with existing buildings. The Tramonto landslide is clearly a geologically sensitive area. One 10,000+ and three 7000+ square foot homes grouped together are clearly out of scale in a (R1-1 Zone) community where the average size house is 2500 square feet, and 34,000 cubic yards of grading requiring over 4900 dump truck trips over narrow streets is clearly excessive.



# No Acceptable Haul Route

**Revello Drive  
12'- 3" Wide  
With a 12' Dip**



**Revello Drive is not wide or stable enough to be used as a haul route for the removal of ~34,000 cubic yards of soil.**





**Lined up end-to-end, 2,414 dump trucks would stretch 12 miles.  
From Castellammare to LAX!**

**With smaller loads it will be less weight, but take longer.  
At a rate of 20 dump truck loads per week, grading and soils removal will take**

**120 weeks / 2.5 years**



# Geological Risk

Bart Young

Building huge luxury homes on an active landslide is a geological risk.

Tramonto Landslide has a long history of failure and disaster.

It's wiped-out streets, sewage lines, and many homes. It's been moving for 100,000 years.

These new houses won't stop the landslide. Both USGS and Caltrans geologists agree this is a bad idea.

Major excavation and soil removal is very likely to trigger new landslides.

Putting excessive weight on top is a way to dump a huge slide onto PCH.

Earthquakes initiate landslides. Two major faults are directly adjacent!

The plan ignores the Moran study and the URS study's drainage plan.

Geologist Don Michael claims Stoney-Miller's recommendations are insufficient.

This proposal makes it impossible to implement proper drainage in the future.

You cannot install a hydrauger system once the houses are built.

Why put us all at risk?



# Geology & Soils: Tramonto/Revello have a long history of landslides.

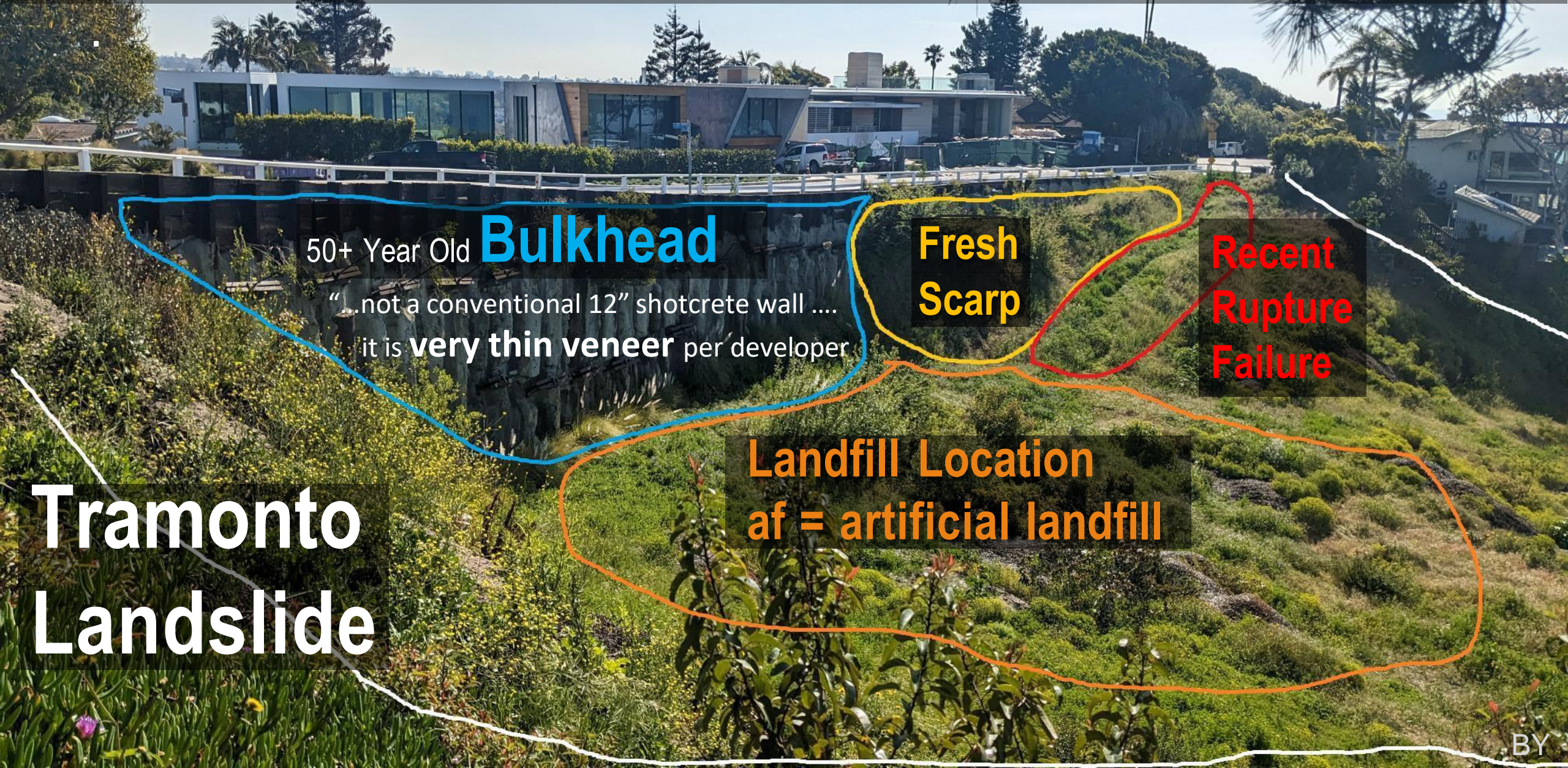


HP060505-6/5/65-PACIFIC PALISADES, CALIF.: Former residents of an apartment house on Los Liones Dr. view the crumbling remains of the building here 6/5 after land slippage under the dwelling pulled half of the building over the edge of cliff in a landslide which has so far destroyed three homes, this apartment, and part of another. UPI TELEPHOTO





# Geology & Soils: Tramonto is still an active landslide.



50+ Year Old **Bulkhead**

“...not a conventional 12” shotcrete wall ...  
it is **very thin veneer** per developer

**Fresh  
Scarp**

**Recent  
Rupture  
Failure**

**Landfill Location  
af = artificial landfill**

**Tramonto  
Landslide**



Tramonto Landslide is at the intersection of the  
**Santa Monica and Malibu Bowl Fault Lines.**

Tramonto  
Slide



**Santa Monica Fault Line**

**Malibu Bowl Fault**





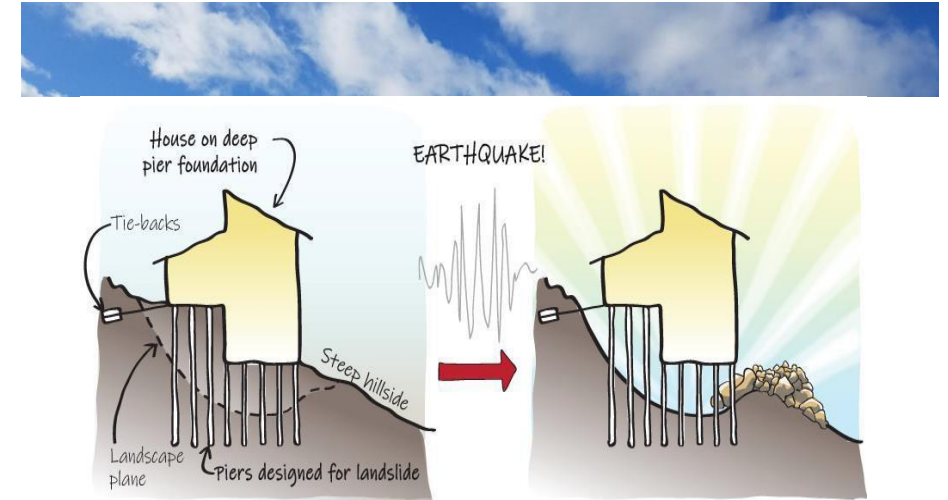
# New homes will not stop an active landslide.

Building structures on a landslide is not a proven method of preventing further slides. In fact, it can exacerbate the risk of a landslide for the following reasons:



1. Excavation or other ground-disturbing activities, which can weaken the ground and trigger a landslide. Even if the houses are built using specialized construction techniques, such as piling or deep foundations, the risk of a landslide cannot be eliminated.

2. Building houses on the top of a landslide slope can increase the weight on the ground, which can further destabilize the soil or rock and increase the risk of a landslide. Additionally, building structures on unstable ground can also weaken the soil or rock and reduce its ability to resist the forces of gravity.



“That (referring to the Tramonto Landslide) is a City of LA slide. And that has been moving for years. It has been determined by geologists that removing will make the issue worse, potentially spreading onto the entire highway and causing a complete shutdown of PCH.







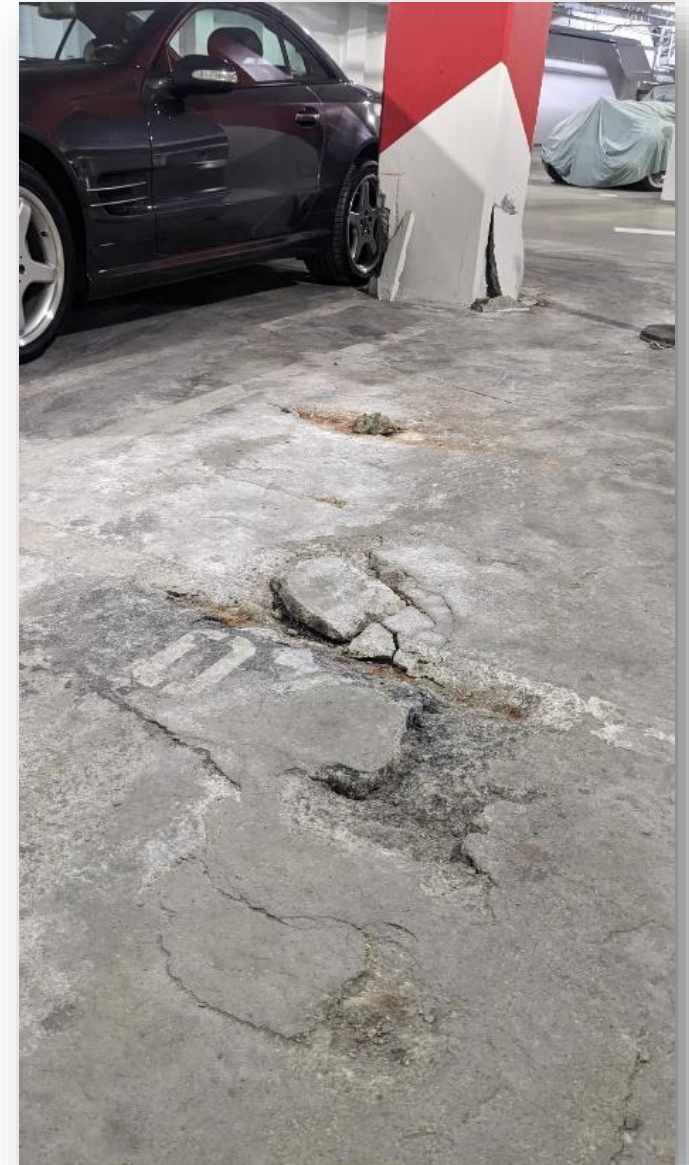
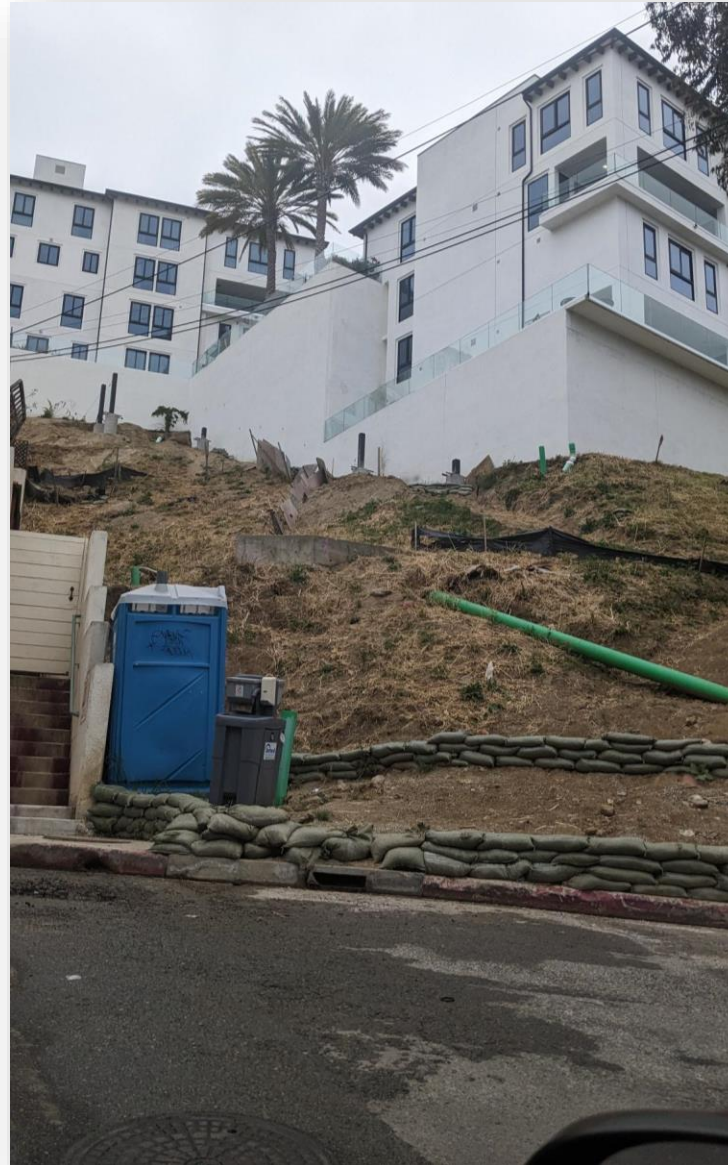
# NO PROOF

**that building on an active landside has been successful.**

One Coast is built on the Revello Landslide which is causing serious damage to the Sunset / PCH Building below.

In the past 6 months the City of LA has produced a handful of grading permits for new locations to be built on slides, but none are yet even started. This is NO PROOF.

**Castellammare is being used as a Guinea Pig at the residents risk and expense.**





# Perception Problem ...

Bart Young

## City Officials think the development will stabilize the side.

Councilmember Traci Park's Planning and Transportation Deputy Jeff Khau told Palisades News her office was initially unsure of its support due to their large size, possibly making them unstable. However, experts assured the project would still stabilize the slope's bedrock by using caissons; a concrete, wood or steel element in a structure's deep foundation used for dewatering.

Khau says other concerns related to the project were sufficiently addressed, such as repaving sidewalks, improving railings and creating a roundabout, along with the developer providing regular updates to assure an expedient timeline for construction and assuring workers and equipment wouldn't block local roadways. Stabilization plans for the Tramonto Drive Landslide have popped up over the years, and there has been dispute over the most economical and safest ways to go about it. According to Khau, taking swift action is imperative. "It would be a stretch to say these homes are consistent with [Tramonto Drive Landslide's] development patterns, but that said, no project would be the worst outcome scenario for safety," said Khau. "There's a lot of landslide debris, the roads are narrow and it creates unsafe conditions ... any project will help improve the status quo."

**Developer has no guarantees to uphold its claims!**

**The City has a long history of abandonment!**

**You cannot purchase landslide insurance!**



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- > Developer has no guarantee to uphold its claims!**
- > The City has a long history of abandonment!**
- > You cannot purchase landslide insurance!**



# **Project Needs to be paused. An Independent EIR is a must.**

- **It is to be built on top of a currently active landslide with no EIR.**
- **Lacks plans to mitigate the entire landslide from top to toe.**
- **Dirt hauling and heavy construction will aggravate the landslide.**
- **Favors use of PROW for a private driveway, which prevents future widening of street and proper maintenance of the bulkhead.**
- **No solid, stable, adequate haul route for removal of +33,000 yards of soil**
- **Current plan will destroy the roads and risk lives in the process.**
- **Restricts fire truck access in designated VHFHSZ (Very High Fire Hazard Severity Zone).**

**This project sets a precedent for building on active landslide properties throughout Pacific Palisades and the City of LA.**





Thank you for listening and your support on this significant issue.



Castellammare Mesa Home Owners



**P.S. Active Landslides often have water cavities deep below the surface. Shallow is 15 to 50 ft.**

**100 – 300 ft is intermediate. 1,000 is very deep.**

**During heavy rains those cavities fill which is how massive landslides occur such as La Conchita near Santa Barbara.**

**The following illustrates the Mud Creek slide in Big Sur which has closed Highway 1 recently.**

**A full EIR needs to reveal the **hydrology** below the surface.**



March 2024 - 1 Million Tons of rock dirt dumps on PCH - Mud Creek Big Sur

**BEFORE**



**AFTER**







## Mud Creek Big Sur, CA



2024-02-23 minus 2023-06-08

*These data are preliminary or provisional and are subject to revision. They are being provided to meet the need for timely best science. The data have not received final approval by the U.S. Geological Survey (USGS) and are provided on the condition that neither the USGS nor the U.S. Government shall be held liable for any damages resulting from the authorized or unauthorized use of the data.*