



Cuddy Valley Statistical Consulting

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Supervisor Michael D. Antonovich
869 Kenneth Hahn Hall of Administration
500 W. Temple Street
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November 28, 2004

About: Tejon Ranch Development

Dear Supervisor Antonovich:

This letter is somewhat premature, because the Centennial DEIR has not been published yet. Nevertheless, I think I should start early by calling your attention to the local and state-wide opposition to the plans of Tejon Ranch Corporation and its associates. I am sure their lobbyists are not waiting for the appropriate time either. Although I am a member of various national and state-wide environmental organizations preparing for the Centennial battle, and on the board of a number of local groups as well, this letter presents my own opinion. I live in Cuddy Valley, less than 10 miles west of Centennial, on the Eastern slope of Mount Pinos. Not even in Los Angeles County.

As you know, TRC's plan is to build a "master-planned community" of 23,500 houses on the old La Liebre ranch in the extreme north-western part of your County, near the boundary with both Ventura County and Kern County. The area is part of the venerable Tejon Ranch. This is the largest planned development of its kind in the County, in fact in the State. It is certainly larger than Newhall, and I think it is considerably more destructive.

The La Liebre area is very rich in history, through its connection with Edward Beale, Moses Sherman, Harry Chandler and Oscar Ralphs. Times-Mirror sold its controlling stake in the Ranch in 1997 to Third Avenue Funds, and investment firm not located in California. They decided to move into real estate development, something that Beale and Chandler (for their own selfish reasons) had managed to prevent for 100 years. These very same investors also own parts of the St. Joe Company in Florida and of Catellus. They buy into cash-poor and land-rich companies and patiently wait and invest for the land to gain in value. It is obviously nonsense to suppose that they are in the least interested in preserving natural resources or historical heritage. California's largest privately owned contiguous natural area is in the hands of Wall Street investors, through their controlling interest in TRC, a Delaware company, by the way.

Our area has the great disadvantage that it is far away from all three county governments, and it is difficult to get supervisors interested in rural areas with low population (and tax) density. Large environmental groups are stretched thin, and tend to concentrate on the coast and the desert anyway. Nevertheless, I think I should point out some important characteristics of the tri-county area. There are currently, in Cuddy Valley, Pine Mountain Club, Frazier Park, Neenach, Lake

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of the Woods, Pinion Pines, Three Points, Gorman, Lockwood Valley, and Lebec approximately 10,000 people. The area is a strip of maybe 20 by 5 miles, much of which is national forest. The I-5 runs through the middle of it through Gorman and Lebec, and so does the old Ridge Route.

TRC plans to locate more than 80,000 people in this rural area, about the population of Santa Monica. This means that urban sprawl will leapfrog the 30 miles from Castaic to Tejon Ranch, and with the additional planned TRC developments sprawl will come to about 30 miles south of Bakersfield. It seems to me, and to many others, that such development will destroy not only the La Liebre area, but much of the surrounding rural communities as well. Local shops will disappear, the area will gentrify, zoning will be changed to small parcels, and the rural roads will be full of cars going to the Centennial Wal-Mart. It's not just Centennial. Piecemeal and leapfrog development along the I-5 corridor will have a disastrous cumulative impact.

It is obvious that this planned development violates all principles of smart growth, and in fact all three founding principles of the Smart Growth Law AB 857 (Wiggins). For your reference I include the relevant section 65041.1 of the California Government Code at the end of this letter. The Attorney General's office is currently looking at possible violations of this law in TRC's development plans. The Institute for the Environment and the Center for Environmental Statistics at UCLA are interested in using Centennial as a prototype example illustrating dumb growth. I hope you can help our thinly populated and apparently almost invisible area in opposing this aggressive violation of California's stated priorities.

There are other considerations. The La Liebre area is biologically sensitive. There are many sensitive and protected species around, and together with the Tehachapi's the area is the unique wildlife corridor in Southern California connecting the Sierras with the Coastal Ranges. We are known for our wonderful wildflower displays, and Centennial is located in or on the boundary of designated California Condor habitat. There is no telling what will happen to the habitat if the population of the area increases by a factor of ten – but our opinion is that the effect is comparable to dropping a small nuclear weapon. The Western Antelope Valley, Cuddy Valley, Hungry Valley and the Grapevine area will go the same way as the Santa Clarita Valley and the Santa Clara River – slow but certain devastation.

As you know, projects such as Centennial and Newhall typically depend on paper water, which is promised, but never delivered, by the SWP. It does not really exist, its only function is to get development projects approved. SWP appropriations to our local water agencies are more than two times as large as the available amount of water. In addition, Centennial purports to use groundwater, but the situation of the aquifers in our area is very problematic. In the seventies and eighties development projects on Tejon Ranch, San Emigdio Ranch, and Cuddy Valley were

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stopped by the courts, because there was no comprehensive groundwater survey. There still isn't. As the overdraft problems in Antelope Valley show, the situation presumably has not improved. So the Centennial area is hydrologically sensitive. It does not really help that bottled water operations are being improved without looking at cumulative impacts, and that Kern County is planning an additional 800 houses on the other side of the I-5.

The La Liebre area has numerous small historical native american sites and trails. We are currently looking into historical and archeological resources, because, as always, there is no reason to suppose that the environmental consultants will do a thorough job, and the County is too understaffed to do credible monitoring.

The same thing is true for the seismic situation. We are sitting on the intersection of the San Andreas, the Garlock, and the White Wolve, close to the epicenter of the largest quake in California history. Again, the courts stopped the Tejon Ranch Lake development in 1973, partly for seismic reasons. Because we have not had a large quake on our segment for more than 100 years, presumably the situation has not improved.

Your board has approved Newhall, which will add 20,000 houses and innumerable trips to the I-5. As the SCAG reports show the jobs/housing ratio in Northern LA County will deteriorate further until at least 2025, which means that Centennial buyers will commute south through the I-5 corridor, adding to the congestion in Santa Clarita and the Valley. We all know it is not true that Newhall and Centennial will provide enough jobs for local residents, neither does Valencia. We also know that widening the freeways only increases the traffic and the bottlenecks. There may be some chance to get local transportation between the Santa Clarita Valley and Los Angeles, there is no chance to get something similar between Los Angeles and the Grapevine. People buying in Centennial will face a 60-80 mile commute, which will take up to two hours both ways. As SCAG predicts, the commute between Northern and Southern LA County will be the worst in the County by 2025. It is likely that Centennial Founders does not put this in their brochures, and I am sure their environmental consultants will not emphasize it in the DEIR.

I understand we have a formidable opponent in this case. TRC controls 300,000 acres of land, a value of at least \$ 300 million, and the value of its common stock is close to \$ 500 million. We love CEQA, but it is a poor and rather impotent tool compared to what the developers can bring to the battle field. We cannot afford to hire environmental consultants that will produce 3000 pages of junk science. Moreover, If TRC builds 23,500 houses, at \$ 500,000 per house, that translates to more than \$ 100 million per year in property tax for the County. We do believe, of course, that the loss in irreplaceable natural and historical resources offsets a large part of this income. Moreover, most smart growth calculations suggest that building large developments far from other developed

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areas and from jobs is ultimately very expensive. Not only for the County, but also for the State and the Federal Government, And that means, of course, for the tax payers.

I know California and LA County are growing, and must grow, but our Governor, SCAG, and LAFCO are at least talking more and more about smart growth and in-fill. Centennial is the opposite. Dumping up to 100,000 people in a low-density, rural, and environmentally sensitive area, where the closest jobs are 30-50 miles away is just criminal. Maybe it's a good idea from the vantage point of Wall Street, or from that of the always wise and benevolent free market, or from the short-term gain perspective of a tax-starved County, but it will stress and break the biology, history, hydrology, ambience, and transportation in our unique area. And, as I hope you realize, those decisions can never be repealed and those losses can never be replaced.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'J. de Leeuw', is centered on a light gray rectangular background.

Jan de Leeuw
Director, Cuddy Valley Statistical Consulting
Distinguished Professor and Chair, UCLA Department of Statistics

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Ps: Government Code 65041.1.

The state planning priorities, which are intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including in urban, suburban, and rural communities, shall be as follows:

(a) To promote infill development and equity by rehabilitating, maintaining, and improving existing infrastructure that supports infill development and appropriate reuse and redevelopment of previously developed, underutilized land that is presently served by transit, streets, water, sewer, and other essential services, particularly in underserved areas, and to preserving cultural and historic resources.

(b) To protect environmental and agricultural resources by protecting, preserving, and enhancing the state's most valuable natural resources, including working landscapes such as farm, range, and forest lands, natural lands such as wetlands, watersheds, wildlife habitats, and other wildlands, recreation lands such as parks, trails, greenbelts, and other open space, and landscapes with locally unique features and areas identified by the state as deserving special protection.

(c) To encourage efficient development patterns by ensuring that any infrastructure associated with development, other than infill development, supports new development that does all of the following:

- (1) Uses land efficiently.
- (2) Is built adjacent to existing developed areas to the extent consistent with the priorities specified pursuant to subdivision (b).
- (3) Is located in an area appropriately planned for growth.
- (4) Is served by adequate transportation and other essential utilities and services.
- (5) Minimizes ongoing costs to taxpayers.

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