



December 18, 2023

To: Ms. Renata Ooms, City Planner

CC: Mr. Vincent P. Bertoni, AICP, Director of Planning

RE: Proposed Home Depot at 16830 W Devonshire St., Granada Hills, CA 91344
CPC-2022-1981-CU-DRB-SPP-SPR
ENV-2022-1982-EAF

Dear Ms. Ooms:

One of the missions of the Los Angeles Unified School District (LAUSD) is to ensure that all of its schools have safe environments and safe walk-routes. To this end, LAUSD has significant concerns regarding Home Depot's (HD) proposed new store at the Granada Hills, North Hills Shopping Center (16830 West Devonshire St.). LAUSD believes that placing a light-industrial facility in close proximity to four public schools with students and their families crossing twice-daily through truck-centric traffic creates a potentially lethal point-specific problem that cannot be properly assessed using regional trip-balancing practices or by pointing out that the Balboa and Devonshire intersection has regulation crosswalks (part of HD's Traffic Assessment Report – TAR). It should be noted that Balboa and Devonshire is the 6th most dangerous intersection in the valley and is part of the city's High Injury Network (HIN).

We believe the only way to accurately evaluate the risk the project poses to LAUSD school children, their families, and staff is for the Los Angeles City Planning Department (LACP) to conduct a full Environmental Impact Report (EIR) with detailed, site-specific analysis that incorporates the following seven components:

1. Use real traffic volumes: LACP is currently allowing HD to use generic traffic "trip" estimates to assess the store's impact because in most instances, such traffic volumes are not accurately known. However, in this case the potential traffic volumes are very well known. This is documented in HD's 20 years of sales data from their Van Nuys store at Balboa and Roscoe Boulevard (HDVN), plus imagery from their Lot Cop cameras. HD could be required to provide this data to an approved third-party consultant, who would then use it to model the proposed store's (HDGH) traffic flows and exhaust emissions, using HDVN traffic volumes that range from 50% to 150% of HDVN's peak volumes. We are aware that HD may lose their Van Nuys store lease, causing up to 50% of that stores customers to shift to HDGH if it is built. Out of an abundance of caution, real rather than generic traffic volumes should be used to ensure that HD's store does not endanger all pedestrians including school students, family members and staff. Sharing this data would also be an act of good faith from HD and support

their claims that (a) the site will easily support the store's actual traffic, and (2) they would never build a store that posed a danger to pedestrians or the community.

2. Clarify and model parking requirements: LACP specifies a set number of parking spaces per unit area of retail space. However, it is unclear whether this allotment includes use of spaces for parking cart corrals, gravel and sand storage bags, rental equipment, day laborer vehicles, contractors selling services in the parking lot, holiday pumpkin and tree sales, the homeless living in their vehicles, and store employees. Analysis shows that HDGH has the smallest ratio of store size to parking slots among all of HD's nearby stores. The above recommendation to use HDVN data to model traffic flows should be extended to assess actual parking slot availability, given all of the additional potential uses. If parking falls below a critical threshold, it will gridlock the lot, forcing potential customers to circle the store, which could create continual congestion of Balboa and Devonshire during peak hours.

3. Computer model customer traffic from the 88 adjacent businesses: There are 88 businesses within one block of the proposed store. No other HD store in the San Fernando Valley has as many adjacent, active businesses. As a result, the shopping center turn lane around the NHSC is frequently gridlocked, causing opposing drivers to dart in and out of traffic lanes when they realize they are headed for a collision (rear-end & head-on). When students on foot are added to this, it creates a chaotic mix that is fraught with danger and should be accurately modeled to assess motorist and pedestrian safety as well as traffic flow (see below).

4. Computer model student, family member and elderly foot traffic: Parents with young children in their arms or in strollers escort their elementary school children to and from the Granada Hills Charter School (GHC TK-8) across Devonshire. Also, high school students from the Valley Academy of the Arts and Sciences (VAAS) cross Balboa and Devonshire multiple times in the morning and afternoon while looking at their mobile phones as they visit nearby stores and their friends. The Ralph's parking lot is also used as a drop-off and pickup point for VAAS students as parents avoid the long car cue on southbound Balboa. Additionally, handicapped residents from nearby adult-care facilities frequently do not make it across Balboa or Devonshire before the light changes, further snarling traffic.

5. Computer model sidewalk vendors, day laborers and homeless living in tents: HD Van Nuys has multiple food vendors who erect tents and provide food to the dozens of day laborers who wait for work and HD customers. The NHSC has a permanent homeless encampment that takes up the area that would normally be used by the food vendors. Combining these three groups in a far smaller area with standard sidewalks and no grass common area (parkway) creates a potentially combustible mix as all of the groups fight for space on a parking lot that is too small for the potential number of customers, at a location that already has multiple law enforcement responses to armed assailants (knives and guns) due to the homeless encampment.

Two additional issues that are not traffic related are:

6. Assess risk posed by hazardous materials and tools: HD sells tools and chemicals that could be purchased after school by a student in distress for use against a perceived bully. This safety concern should be discussed by the LAUSD and LACP with the appropriate experts and authorities.

7. Assess fire and evacuation impacts on nearby schools, businesses and care facilities: In 2022, the Blossom Hill Road HD store in San Jose burned down. The clouds of toxic smoke required the evacuation of nearby residents for nearly 24-hours. Should the proposed HDGH store catch fire, all nearby schools, possibly including Patrick Henry Middle School, would need to be evacuated. This threat will require LAUSD to create evacuation plans with rehearsals as students may be required to rapidly move away from their school on foot, which is an issue fraught with complexity and risk.

If the project is allowed to move forward without incorporating the above issues in LACP's analysis and an accident(s) occurs, Home Depot will be able to claim that it met all city-specified requirements, and is therefore free of any liability. This will potentially leave LAUSD and the City of Los Angeles liable for damages which could easily run into the millions per occurrence. It should be stressed that once the superstore is approved, there are few if any inexpensive remedies to reduce the risk to students, their families and the community. HD will be free to make profits without any liability for the traffic, delays, pollution, injuries or other issues their store creates.

In closing, we feel that safety should be LACP's first and foremost consideration, and not regional trip balancing when evaluating the suitability of the site. This is true especially in light of:

1. HD's local representative, Ms. Nicole Kuklok-Waldman has publicly stated multiple times at neighborhood council meetings that HD only builds one size superstore (approx. 134,000 sq. ft.), and will not reduce the size of their store to fit a given location. Rather, it is up to local government to remediate HD's chosen site. By making this statement, HD presupposes that they never choose inappropriate sites, even though this has occurred multiple times in the San Gabriel and San Fernando valleys,
2. HD's previous attempt in 1994 to build a superstore near Granada Hills High School was stopped by the City Council due to the danger it posed to students on foot. The Council approved a zoning change to prevent all non-food related businesses from opening before 8 AM. HDGH will be the same distance from the nearby public schools and is proposing store hours of 6am to 10pm,
3. HD's documents are worded so that any liability created by their store will be shifted onto LAUSD, the City of Los Angeles and other organizations once they approve the project. Losses due to accidents and remedial measures could easily outstrip decades of tax revenue and any benefit to the community, which already has 13 home improvement superstores, 10 lumber yards and over 200 more specialty building, plumbing, electrical, brick & block, flooring, roofing, irrigation and nursery businesses; and
4. This approach supports the City of Los Angeles' Vision Zero, which commits the city to eliminate pedestrian deaths by 2025.

Page 4

Thank you for your time. We are available to discuss the above safety issues with the LACP at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Schmerelson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott M. Schmerelson
Board Vice President
Board Member, District 3