

January 25, 2007

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Environmental Review Section  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

Subject: Ponte Vista DEIR – Case No. ENV-2005-4516-EIR  
26900 S. Western Avenue

Dear Mr. Riker:

Thank you for the opportunity to provide comment on the aforementioned DEIR.

The proposed Ponte Vista Project consists of redeveloping the 61.5-acre abandoned U.S. Navy's "San Pedro Housing" site with a 2,300-unit townhome and condominium development that includes 10,000 square feet (ft<sup>2</sup>) of retail space, approximately nine total acres of parkland, and a two-acre waterscape concourse. The proposed development would be a gated community with a residential density of 37 dwelling units per acre. The proposed retail space would be internal to the gated community. The only portion of the proposed project that would be accessible to the public is a proposed six-acre park at the southern boundary of the site.

Of note, the Los Angeles Unified School District (LAUSD) has identified the project site as the preferred site for the planned South Region High School #14. This school would require 24 acres and, as such, the proposed project and the high school could not collocate on site.

### **General Comments**

#### Public Notice (NOC)

- The Notice of Completion and Availability of Draft EIR includes entitlements relative to a Specific Plan, General Plan Amendment, Zone Change and Vesting Tentative Tract Map. Page II-27 includes a Development Agreement, is there a reason this was not included in the NOC notice?

#### Listing of Discretionary Actions

- On Page II-27 (Discretionary Actions), the last bulleted item states "Any other necessary discretionary or ministerial permits or approvals required for the construction or operation of the Project." This statement is far too general and does not provide enough information to the general public on what other discretionary permits could be applied

for in the future. In addition, unknown “future discretionary permits” could create potential impacts that may not be currently addressed in the DEIR. We recommend that this sentence be deleted from the DEIR.

### **Aesthetics**

- The proposed average building height is four (4) stories with a maximum height of six (6) stories. Residential buildings along Western Avenue would be four (4) stories in height (approximately 50 feet). This would substantially change the aesthetic character of Western Avenue, which is currently characterized by open spaces (e.g. cemetery) and low-rise residential structures. The EIR offers no mitigation for this change in aesthetic character but, rather, claims the project would improve the visual quality of the site’s frontage along Western Avenue by installing new structures and landscaping.
- The proposed six-acre park along the site’s southern boundary includes lighting for nighttime sporting events. While this will be a substantial new light source, no lighting impacts are expected to occur within the City of Lomita due to the distance between the proposed park site and Lomita’s City limits.

### **Air Quality**

- As of October 2006, the SCAQMD identifies the thresholds of significance for PM<sub>2.5</sub> in addition to the thresholds of significance for PM<sub>10</sub>:

Construction: 55 lbs/day

Operation: 55 lbs/day

The EIR should consider the SCAQMD’s thresholds of significance for PM<sub>2.5</sub> and analyze the project’s potential impacts accordingly. The discussion of the project’s construction and operation air quality impacts should be revised to address PM<sub>2.5</sub>, and tables IV.B-3, IV.B-4, and IV.B-5 should be revised accordingly.

- Regional Construction Impacts - Construction of the proposed project would generate NO<sub>x</sub>, PM<sub>10</sub>, and ROG in excess of the SCAQMD thresholds of significance. The thresholds for NO<sub>x</sub> would be exceeded during demolition, grading, and construction; the thresholds for PM<sub>10</sub> would be exceeded during grading; and the thresholds for ROG would be exceeded during construction. The proposed mitigation measures would reduce PM<sub>10</sub> to below the SCAQMD thresholds of significance; however, NO<sub>x</sub> and ROG construction emissions would remain in excess of the SCAQMD thresholds. The EIR identifies this as a significant and unavoidable impact.
- Construction Impacts on Sensitive Receptors – The EIR notes that the project site is adjacent to single- and multi-family residences, which would be sensitive receptors to the construction emissions generated by the project. In addition two schools – Dodson Middle School and Mary Star of the Sea – are located in the immediate vicinity of the project site, which are additional sensitive receptors. The EIR, however, does not identify the extent of the potential air quality impacts on these

sensitive receptors and does not consider the SCAQMD's Localized Significance Thresholds. Rather, the EIR simply notes that compliance with SCQAMD Rules 402 and 403 would adequately reduce the project's potential impacts on sensitive receptors. In accordance with the SCAQMD's Localized Significance Threshold Methodology document (June 2003), the EIR should include dispersion modeling to assess the project's construction impacts on nearby sensitive receptors. The need to analyze the potential localized air quality impacts during construction is emphasized by the project's exceeding the SCAQMD's region-wide significance thresholds for NO<sub>x</sub>, PM<sub>10</sub>, and ROG.

- Operation of the proposed project would exceed the SCAQMD thresholds of significance for ROG, NO<sub>x</sub>, and CO. However, the EIR concludes that this impact is less-than-significance because the "Project would not violate any applicable air quality standard, and because it is consistent with and would implement all relevant AQMP, RCPG, and RTP strategies to attain and maintain compliance with federal and State ambient air quality standards." The EIR further indicates that SCAQMD's thresholds of significance for operation should not apply to the large-scale Ponte Vista project because the SCAQMD's thresholds of significance do not account for project size (i.e. the same thresholds are applied regardless of the size of the project). As a result, the EIR concludes that operation of the project would not have significant air quality impacts -- even though the air pollutant emissions that would be generated by project operation would exceed the SCAQMD's thresholds of significance. This conclusion is inconsistent with SCAQMD recommendations and is not substantiated. The SCAQMD thresholds identify the pounds per day of air pollutants attributable to a project that the SCAQMD considers significant to the air environment. The fact that the SCAQMD thresholds of significance do not differentiate between project size is irrelevant. By their nature large-scale developments generate more air pollutants than small-scale developments; however, that fact in no way means that large-scale projects should have higher thresholds of significance. On the contrary, large-scale developments offer greater opportunities for air pollutant mitigation due to their ability to incorporate transit opportunities and other low-emission features.

### **Biological Resources**

- Two California coastal gnatcatchers (a federally endangered species) were observed on the vegetated slope just north of the project site that would be graded as part of the project. The EIR includes mitigation measures to avoid significant impacts to California coastal gnatcatcher; in particular, the proposed mitigation would limit grading of this slope to the gnatcatcher's non-nesting season to prevent incidental takings of the species.
- The proposed project includes covering the natural drainage course in the southern portion of the site. Compliance with the federal Clean Water Act and the California Department of Fish and Game Code would prevent significant impacts from this action.

### **Land Use**

- The project proposes a General Plan Amendment to change the land use designation in the Wilmington-Harbor City Community Plan for the project site from Low Residential and Open Space to Medium Residential.
- The project proposes a zone change from R1-1XL and OS-1XL to Specific Plan.

### **Noise**

- The vehicle trips generated by the project would not cause a noticeable increase in ambient noise levels along Western Avenue within Lomita. The greatest projected increase in ambient noise along Western Avenue north of the project cause by project-induced traffic is 0.5 decibels (db), which would occur south of Palos Verdes Drive North. For comparison, 3.0 db is considered a noticeable increase in ambient noise.
- The EIR identifies the project's construction-induced noise as a significant and unavoidable project impact. However, the project site is approximately 0.6 miles south of the City of Lomita and, as such, construction noise generated on the project site is not expected to significantly impact any portions of Lomita.
- The EIR identifies the noise generated by the proposed six-acre park as a significant and unavoidable impact. However, this proposed park would be located approximately one mile south of the City of Lomita and, as such, park-related noise is not expected to significantly impact any portions of Lomita.

### **Population and Housing**

The Draft EIR provides an analysis of the population and housing impacts of the project and concludes that all population and housing impacts will be beneficial, therefore, negating the need for any type of mitigation. According to the DEIR, the impacts are beneficial primarily because they assist the City of Los Angeles in meeting its strategic housing goals as set forth in various community plans (CPA's) and the City's General Plan Framework and Housing Element. While this conclusion is valid, the analysis in the DEIR does not accurately depict population and housing impacts associated with the project and fails to acknowledge and/or adequately address the following:

- The project will increase the number of dwelling units on the project site from 245 units to 2,300 units – an almost 10-fold increase in the number of units currently on the project site.
- The analysis assumes an unrealistically low persons-per-household (pph) factor in determining population increases resulting from the project.
- The analysis of project-related population and housing impacts in the DEIR is based on housing and population projections of *two* community plans.

- Although the project proponents claim the project will provide a “spectrum of housing prices” and will include senior housing, there are no affordability restrictions being placed on the project.
- Although characterized as an infill project in the DEIR, the DEIR fails to disclose that the housing to be built is essentially high-density multi-family housing that is fundamentally different than housing currently existing in the immediate area.
- The proposed project is growth inducing because infrastructure required to be installed for the proposed project could be easily extended to serve potential future development to the north and to the east.
- Jobs-housing balance is inadequately addressed. This is a “housing rich” project intended to increase housing opportunities for workers in the area, however, very few people in the general area (including those employed in the retail component of the project) will likely be able to afford to buy a unit in the project.
- Many of the potentially significant housing and population growth impacts of the project could be reduced by adopting one of the project alternatives which reduces the proposed total number of dwelling units in the project.

The project proposes to demolish 245 residential units, a community center, and a convenience facility that were constructed in approximately 1962 for the U.S. Navy. These dwelling units are unoccupied; therefore, no persons or households will be displaced as a result of the project. However, as noted above, the total number of units will increase by 2,055 units, which represents a large increase in residential density for this parcel. This would occur in an area that is predominantly developed with low-density single-family residential uses with an approximate density of 6-7 dwelling units per acres. The project proposes a density of 37 units per acre.

The DEIR describes a population increase of 4,313 persons resulting from the project. This is based on a persons-per-household factor of 2.0 persons-per- households for non-senior units and 1.5 persons-per-households for the seniors units. However, the State Department of Finance (DOF) projects a Year 2006 person-per-household factor of 2.966 for the City of Los Angeles.<sup>1</sup> Assuming that the 2.966 factor is applied to the non-senior units (1,480 units) and 1.5 persons occupy the senior units (575 units), the overall population increase resulting from the project would be 5,252 persons.

The proposed project is located in the City of Los Angeles’ Wilmington-Harbor City Community Plan area. It also borders the San Pedro Community Plan Area. The DEIR combines the housing statistics and goals of both communities’ plans to arrive at conclusions that understate the housing and population impacts of the project. The analysis should be re-conducted; limiting comparison of the project to only the Wilmington-Harbor City Community Plan area in order to arrive at fairer and more realistic conclusions in regards to housing and population growth impacts in the area.

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<sup>1</sup> California State Department of Finance, Table 2:E-5 – City/County Population & Housing Estimates, January 1, 2006.

The DEIR describes (as one of the objectives of the project) the provision of new housing to meet the housing needs of a “wide spectrum” of households. However, the DEIR acknowledges that *all* of the units in the project, including the senior housing units, will be market-rate units. The result is that those for whom the housing is supposedly intended (school teachers, fire fighters, police men and women, service sector employees and their families) will not be able to afford these market rate units. The DEIR itself acknowledges that currently only 19% of households in the greater Los Angeles County area can afford to buy a median-priced home. Without meaningful affordability restrictions placed on units within the project, they will be priced out-of-range of the persons who are in most need of this kind of housing.

Aside from the large increase in residential density proposed for the project site, there is little or no acknowledgement in the DEIR that the project represents a fundamental transition away from the low-rise, single-family character of the immediate area in which the project is proposed. Directly across Western Avenue to the west is an established low-density, single-family residential subdivision. A cemetery is located just to the north of these residences. A Google Earth search of the general environs reveals that the project will result in extending high-density, multi-family housing projects further to the north (north of Avenida Aprenda) into an area currently without this type of housing.

The project has the potential for inducing new population and housing growth in the area by providing public utilities (sewer, water, electrical, etc.) into the new subdivision which can then be extended further to serve potential new development to the north and east of the project site. The U.S. Navy’s Defense Fuel Support Point (DPSP) is located to the north of the project site, and the future site of and new campus for Mary Star of the Sea High School is located to the east. The DEIR does not clarify whether or not parcels located in these two areas are zoned or may be made available for development in the future.

The DEIR discusses but does not adequately address the jobs-housing balance of the project. While the project will result in an incrementally improved jobs-housing balance ratio (from 1.448 to 1.446 for the SCAG Subregion), it is unclear whether or not jobs being provided within the project (approximately 29 employees serving 10,000 square feet of retail uses) will be able to afford (based on income) market rate units located within the project itself and thus reduce vehicle miles traveled (VMT), which is the ultimate goal of attaining a jobs-housing balance. The City of Lomita requests the proposed project include an affordable housing component, with a percentage of units offered at below the market rate.

Various project alternatives are discussed and analyzed in the Draft EIR, including the No Project alternative. Other than the No Project alternative, Alternative “C” – Reduced Density alternative, has the greatest potential for reducing population and housing impacts resulting from the project. Under this alternative, the total number of dwelling units would be reduced from 2,300 to 1,700 with 25% of these units (425 units) reserved for seniors only. Using the State DOF persons-per-household factor of 2.996 (and using a 2 persons-per-household factor for the senior units), the total population under Alternative “C” would be 4,670 persons. Although still a significant increase in both housing and population under Alternative “C” would occur, it is preferable over the proposed project primarily because a reduced density project would reduce ancillary impacts such as air quality and traffic impacts. It is also preferable over the other alternatives (excluding the No Project

alternative) that propose either increases in commercial uses on the project site (including “big box” retail) or redevelopment of the project site for mixed biomedical and residential uses.

### **Transportation and Traffic**

The Transportation and Traffic section of the DEIR is based on the *Traffic Impact Study, Ponte Vista at San Pedro, City of Los Angeles, California, September 8, 2006* prepared by Linscott, Law & Greenspan Engineers (LL&G) and found in Appendix IV.J-1. This section of the DEIR was reviewed using the analysis methodology followed the Congestion Management Program Traffic Impact Assessment (CMP TIA) guidelines and includes analysis of the following:

- A. Trip generation methodology,
- B. Intersection analysis of study intersections within the City,
- C. Impact of project traffic, including related projects, added to study intersections within the City, and
- D. Analysis of mitigation measures for study intersections within the City.

Our comments are as follows:

#### Trip Generation Methodology

- What is the justification for using Land Use Code 488, Soccer Complex for 2 baseball fields? There is no specific explanation in the text other than “approval by LADOT staff for use in the traffic analysis” (Page IV.J-34). A more detailed explanation should be provided. The study also makes a statement regarding approximately 10,000 square feet of retail uses and recreational amenities (e.g., coffee shop, convenience market, fitness center, etc.). The study indicates (Page IV.J-34) that these uses “are not expected to be used by persons who are not residents of the Project; therefore, their potential to generate new trips onto the local street system is negligible”.
- Why wouldn’t some trips accessing these retail uses and recreational amenities generate additional trips? How can this “negligible” number of trips be justified? Coffee shops and convenience markets can cause a high demand in trips. A conservative number of trips should be generated for this approximately 10,000 square feet of retail uses and recreational amenities. Additionally, the trip generation methodology analyzed Saturday trip generation. This analysis identified these Saturday trips as occurring “during Saturday mid-day peak hour” (Page IV.J-35). The *Trip Generation* manual indicates that these trips occur during the “Peak Hour of Generator”. The Peak Hour of Generator would represent the highest hour when the most trips are generated by the specific use. For example, this could be 9:00 AM for condominiums and 12:00 PM for senior housing. The *Trip Generation* manual does not define the time or period for the “Peak Hour of Generator”. However, the worse case scenario would be to use the peak hour of each generator to make an analysis of Saturday traffic impacts.

- The Saturday trip generation analysis does not necessarily occur “during the Saturday mid-day peak hour.” The Saturday trip generation is the “Peak Hour of Generator”. The study should make this correction and explain that the Saturday analysis is a worse case (conservative) analysis.

### Intersection Analysis

The analysis of study intersections within the City of Lomita included the following intersections:

- A. Arlington Avenue (Narbonne Avenue)/Lomita Boulevard (#8)
- B. Narbonne Avenue/Pacific Coast Highway (#9)
- C. Western Avenue/ Palos Verdes Drive North (#15)

Table IV.J-11 provides the summary of the Intersection Capacity Utilization (ICU) analysis conducted on the City’s 3 study intersections. Only the intersection of Western Avenue/Palos Verdes Drive North included analysis of Saturday traffic impacts. Our comments are noted below:

- In comparing Table IV.J-11 to the ICU Data Worksheets in Appendix C and Appendix C-2, there seems to be a discrepancy. Appendix C indicates the analysis is “Ponte Vista Analysis”. Appendix C-2 indicates the analysis includes “Ponte Vista and Mary Star Analysis”. In Table IV.J-11, column 3 is “Year 2012 Future Pre-Project” (without Mary Star High School) and should correspond to Appendix C. Column 4a is with Mary Star High School and should correspond to Appendix C-2.
- A correction needs to be made in Table IV.J-11 or in Appendix C or in Appendix C-2 to insure the V/C ratios and LOS correspond. In Table IV.J-11, Column 3 does not appear to correspond to Appendix C and Column 4a does not appear to correspond to Appendix C-2. Mitigation measures must be recommended if significant traffic impacts occur with these revisions.

### Impact of Project Traffic

- Figures IV.J-9, J-10, and J-11 identify the total trips generated by the proposed project. Based on these figures and the ICU analysis, the intersections of Arlington Avenue (Narbonne Avenue)/Lomita Boulevard and Narbonne Avenue/Pacific Coast Highway are not significantly impacted. This can be expected based on the distance these intersections are located from the proposed project.
- As expected, Western Avenue/Palos Verdes Drive North experiences the highest increase in proposed project trips of the 3 City of Lomita study intersections. The northbound right turn movement is projected to have a traffic volume of 597 during the AM peak hour in the “Year 2012 Mitigation for Project and Mary Star” scenario.
- For the intersection of Western Avenue/Palos Verdes Drive North, there is a projected volume of 597 during the AM peak hour at the “Year 2012 Mitigation for Project and Mary Star”. The lowest projected volume for this movement is 358

during the PM peak hour. Why isn't this amount of turning traffic being accommodated in a separate turn lane?

Analysis of Mitigation Measures

Based on the City's criteria defining a significant traffic impact, the intersection of Western Avenue/Palos Verdes Drive North experiences significant traffic impacts with the proposed project. The study proposes the following mitigation measures (Page IV.J-112):

- A. "Fund and install ATSAC/ATCS (or similar traffic signal synchronization system approved by Caltrans and LADOT), and
- B. Modify the westbound approach of Western Avenue to "provide two left-turn lanes."

The installation of the proposed dual left-turn lanes will require:

- A. Modification of the existing median, traffic signal equipment, and roadway striping,
  - B. Removal of 5 parking spaces on the north side of Palos Verdes Drive North west of Western Avenue, and
  - C. Removal of 10 parking spaces on the north side of Palos Verdes Drive North east of Western Avenue.
- The proposed mitigation measure at Western Avenue/Palos Verdes Drive North requires removal of on-street parking. How or where will the displaced parking spaces be accommodated?
  - In Appendix H of the LL&G traffic study, there is a conceptual drawing of the proposed mitigation measure for the intersection of Western Avenue and Palos Verdes Drive North. This conceptual drawing does not accurately illustrate the "back to back" left turn lanes on Palos Verdes Drive North west of Western Avenue. In addition, there are only 3 eastbound through lanes on Palos Verdes Drive North west of Western Avenue.
  - The conceptual drawing of the proposed mitigation measure should be corrected to better reflect existing conditions on Palos Verdes Drive North west of Western Avenue. This should include the "back to back" left turn lanes and the 3 eastbound through lanes on Palos Verdes Drive North.
  - In the ICU Data Worksheets for Western Avenue/Palos Verdes Drive North, the mitigation column (2012 W/Project Mitigation) shows the proposed dual westbound. However, this column (and 2012 W/Project Site Traffic) also identifies the addition of a southbound right turn lane on Western Avenue. There is no discussion of this proposed mitigation measure in the DEIR or LL&G traffic study.
  - Include discussion of the proposed southbound right-turn lane in the mitigation measures for Western Avenue/Palos Verdes Drive North. If this is not a proposed recommendation, the ICU Data Worksheets must be revised accordingly. Any revisions should be correctly reflected in Table IV.J-11.

Intersections Not Within the City of Lomita

In addition to the three intersections within Lomita, the following 10 intersections that would be traveled by Lomita residents accessing the 110 Freeway were considered in Lomita's review of the EIR:

**Western/Anaheim**

Western/PCH

Western/Lomita

Western/Sepulveda

Normandie/PCH

Normandie/Lomita

**Normandie/Sepulveda**

Vermont/PCH

Vermont/Lomita

Vermont/Sepulveda

The review of these intersections consisted of looking specifically at:

- The project trips generated through the intersections,
- The intersections that were significantly impacted by traffic based on the thresholds of each agency affected, and
- The proposed mitigation measures as they relate to the project trips.

Of these 10 intersections, only 4 were significantly impacted. The four impacted intersections are all located within the City of Los Angeles and included:

**Western/Anaheim (#14)**

**Western/PCH (#13))**

**Western/Lomita (#12)**

**Vermont/PCH (#44)**

The DEIR proposed the ATSAC signal synchronization as the mitigation measure for the intersections of Western/Anaheim and Western/PCH. No other measures were recommended.

For the intersection of Western/Lomita, the ATSAC signal synchronization was part of the proposed mitigation measures. The mitigation also included a restriping of the southbound travel lanes of Western. The new striping would add a southbound left turn lane and a right turn only lane. The southbound striping would include 2 left turn lanes, 2 through lanes and 1 right turn only lane. The project traffic anticipated through this intersection did not include a large increase in the southbound left turns or any right turning traffic.

For the intersection of Western/PCH, the ATSAC signal synchronization was also a part of the proposed mitigation measures. The mitigation included widening of PCH to accommodate an additional westbound left turn lane. The westbound striping would include 2 left turn lanes, 2 through lanes and 1 shared through-right turn lane. Project traffic was anticipated to travel in the westbound left turn lane in both the AM and PM peak hours.

Figure IV.J-27 does not appear to depict the mitigation measures described for Western/Lomita or Western/PCH.

Cut-Through Traffic

Various streets that intersect Pacific Coast Highway and Lomita Boulevard within the city limits of Lomita are susceptible to cut-through traffic during a.m. and p.m. peak periods. Any additional traffic increase created by this project will create significant impacts to these streets. This adverse impact should be evaluated in the EIR.

If you have any questions, you may contact me at (310) 325-7110, extension 121.

Sincerely,

Gary Y. Sugano  
Community Development Director  
City of Lomita

CC: Mayor and City Council  
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