



## CITY OF LOMITA CITY COUNCIL REPORT

Item No. 10

**TO:** City Council

**FROM:** Michael Rock, City Manager

**PREPARED BY:** Gary Y. Sugano, Assistant City Manager

**MEETING DATE:** December 17, 2012

**SUBJECT:** Comment Letter on the Ponte Vista Draft Environmental Impact Report (DEIR)

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### **RECOMMENDATION**

Staff recommends that the City Council authorize the Mayor to sign the attached response letter to the City of Los Angeles on the Ponte Vista Draft Environmental Impact Report (DEIR).

### **BACKGROUND**

On November 8, 2012, the City of Los Angeles released a Notice of Availability for the Ponte Vista DEIR. This version of the Ponte Vista DEIR excluding the technical appendices is 1,344 pages in length. The comment period on the Draft EIR began on November 8, 2012 and ends on January 7, 2013.

On June 16, 2008, the City Council authorized the Mayor to sign and submit a letter affirming the City's opposition to the Ponte Vista project.

On February 19, 2008, the City Council authorized the Mayor to sign and submit a letter to the City of Los Angeles requesting recirculation of the Ponte Vista DEIR.

On February 4, 2008, the City Council directed staff to prepare a letter to the City of Los Angeles requesting recirculation of the Ponte Vista DEIR.

On January 16, 2007, the City Council authorized the submittal of a response letter to the Ponte Vista DEIR.

The original Ponte Vista project proposed 2,300 residential units, 10,000 square feet of commercial floor area and 9 acres of open space. The project has been reduced to 1,135 residential units, 4.8 acres of open space and no commercial/retail space.

The revised description of the project is as follows (from the DEIR):

The Project proposes a Specific Plan (proposed density is approximately 18 units per acre), General Plan Amendment, Zone Change, and Vesting Tentative Tract Map for the subdivision, construction, and operation of a 1,135-unit residential development. The Project's residential units would be comprised of single-family, duplex, townhome, flat, and apartment units ranging in size from 600 to approximately 2,800 square feet, within buildings constructed over and/or adjacent to residential parking garages. Up to 392 of the 1,135 units may be rental units.

The Project would also provide an access road from Western Avenue to the off-site, private Mary Star of the Sea High School. The Project site is approximately 61.5 acres. The Project would incorporate large internal open space and recreational areas, including an approximately 2.8-acre park, 1.3-acre community clubhouse and pool/recreation area and an approximately 0.7-acre open space and trail network. Additional recreational amenities would be distributed throughout the site. The Project would involve the demolition and removal of all existing improvements on the site, which include 245 vacant residential units, a 2,161-square foot community center, and a 3,454-square foot retail convenience facility which were constructed in approximately 1962 by the U.S. Navy for the purpose of housing and accommodating personnel stationed at the Long Beach Naval Shipyard. The site (formerly known as "San Pedro Housing") was closed in the late 1990s.

## **ANALYSIS**

### Density

The residential density for the project is understated which may mislead the public analyzing the DEIR. Under the project description and the land use sections for the DEIR, the residential density is calculated by counting the proposed residential lots, private streets and open space areas.

### Transportation and Circulation

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)
- D. Crenshaw Boulevard/Lomita Boulevard (#5) is adjacent to the City border

The analysis of the existing (2010) summary of the Vehicle Capacity (V/C) and Level of Service (LOS) analysis was conducted on 4 study intersections within the City.

- The intersection of Crenshaw Bl./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Narbonne Ave./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Western Ave./Palos Verdes Drive North in the AM peak period and PM peak period currently operates at LOS E and LOS D respectively.
- The City's general concern is that many of these intersections already operate at below acceptable standards and any incremental increase from a 1,135 unit development will make existing conditions that much worse.

- Of particular concern is the intersection of Western Ave./Palos Verdes Drive North which under the 2017 analysis would operate at LOS F for both the AM and PM peak periods. Although the DEIR states that with the proposed mitigation measure (Trans – 5) the project impact to this intersection would be less than significant, there is no specific analysis in the Transportation/Traffic section that analyzes/confirms this.
- Many of the proposed transportation mitigation measures require improvements in jurisdictions of neighboring cities and Caltrans. The City of Lomita has not received any communication from the developer, traffic consultant or environmental consultant on the feasibility of mitigation measure Trans-5 relative to restriping and other modifications proposed at PV Drive North and Western Avenue.

Level of Service E is defined as "poor". *Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.*

Level of Service F is defined as "failure". *Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.*

The City believes that the reliance of existing condition traffic data/counts in the DEIR from 2010 (more than 2 years old) may not accurately reflect the true impact of the project on traffic. The increase in the number of residential units will create a substantial impact on surrounding roadways including Western Avenue. The vehicle trips will also create a negative impact on other intersections within the City of Lomita along Pacific Coast Highway, Palos Verdes Drive North, Crenshaw Boulevard, Narbonne Avenue and Lomita Boulevard. A project with a lower density (7-10 units per acre as opposed to 20+ units per acre) would be more appropriate for the subject site.

#### Construction Vehicles

Due to the number of residential units and the length of expected construction time, the City has concern with the number of large construction vehicles entering and exiting the site particularly during grading and demolition activities. A number of these vehicles, particularly the off-site load hauling vehicles may need to go through the City of Lomita to get to its final destination. For this reason, the City is requesting that two proposed mitigation measures be amended to require that 1) prior to the start of construction, require a meeting with surrounding cities including Lomita to ensure that construction trucks follow designated truck routes to reduce impacts and 2) two weeks prior to the start of construction that the City of Lomita be notified of the construction schedule which would include the types of activities and equipment that would be used during the construction period.

Should the City of Los Angeles approve the project, as stated in the draft letter, the City of Lomita would prefer Alternative C which proposes 830 residential units at a density of 19.5 units per acre. This would be a reduction of 305 residential units from the proposed project.

**OPTIONS**

- 1) Authorize the submittal of the comment letter.
- 2) Do not authorize the submittal of the comment letter.
- 3) Give staff alternative direction.

**FISCAL IMPACT**

None.

Prepared by:

  
\_\_\_\_\_  
Gary Y. Sugano  
Assistant City Manager

Approved by:

  
\_\_\_\_\_  
Michael Rock  
City Manager

Attachments

- 1 - Draft Letter to City of Los Angeles
- 2 - Project Location/Vicinity Map
- 3 - Proposed Site Plan (1,135 residential units)
- 4 - Site Plan for Alternative C (830 residential units)

## CITY COUNCIL

MARGARET ESTRADA  
JIM GAZELEY  
HENRY SANCHEZ JR.  
MICHAEL G. SAVIDAN  
BEN TRAINA



## ADMINISTRATION

MICHAEL ROCK  
CITY MANAGER

## CITY OF LOMITA

December 18, 2012

Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Attn: Erin Strelch, Planning Assistant (Email – [erin.strelch@lacity.org](mailto:erin.strelch@lacity.org))

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

To Whom It May Concern:

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

The Project proposes a Specific Plan (proposed density is approximately 18 units per acre), General Plan Amendment, Zone Change, and Vesting Tentative Tract Map for the subdivision, construction, and operation of a 1,135-unit residential development. The Project's residential units would be comprised of single-family, duplex, townhome, flat, and apartment units ranging in size from 600 to approximately 2,800 square feet, within buildings constructed over and/or adjacent to residential parking garages. Up to 392 of the 1,135 units may be rental units.

The Project would also provide an access road from Western Avenue to the off-site, private Mary Star of the Sea High School. The Project site is approximately 61.5 acres. The Project would incorporate large internal open space and recreational areas, including an approximately 2.8-acre park, 1.3-acre community clubhouse and pool/recreation area and an approximately 0.7-acre open space and trail network. Additional recreational amenities would be distributed throughout the site. The Project would involve the demolition and removal of all existing improvements on the site, which include 245 vacant residential units, a 2,161-square foot community center, and a 3,454-square foot retail convenience facility which were constructed in approximately 1962 by the U.S. Navy for the purpose of housing and accommodating personnel stationed at the Long Beach Naval Shipyard. The site (formerly known as "San Pedro Housing") was closed in the late 1990s.

### **The City of Lomita opposes the Ponte Vista project based on the following issues:**

#### Density

Using the current project description, the project's density was calculated utilizing the entire 61.5 acre site (18 units per gross acre). The net density is actually over 20 units per acre. We still question the basis for calculating the density in this manner since it will yield a lower gross acreage per unit over the entire site rather than on only the actual net residential acreage (i.e., the areas covered by open space and private streets are being allowed to count as residential land

when determining the units per acre). This can mislead the public into thinking that the proposed density is lower than what it actually is. Many jurisdictions calculate permissible density based on the net residential acreage (not the entire site that includes streets and open space). Even at the lower density level, the proposed project and the various alternatives would still be requesting amendments to the general plan, zoning and a specific plan request to increase the permissible density above what is normally allowed under a single family residential zone. This level of density is not appropriate for the surrounding community and will have substantial environmental impacts (e.g., traffic, noise, aesthetics and air quality) that cannot be mitigated adequately.

#### Construction-Related Vehicle Trips

Due to the number of residential units and the length of expected construction time, the City of Lomita has concern with the number of large construction vehicles entering and exiting the site particularly during grading and demolition activities. A number of these vehicles particularly the off-site load hauling vehicles may need to go through the City of Lomita to get to its final destination. For this reason, we request that the following 2 proposed mitigation measures be amended as follows:

**NO-6** All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. **Prior to the commencement of construction at the project site, a meeting shall be held with the surrounding cities (including the City of Lomita). The purpose of the meeting will be to designate truck routes for off-site load hauling vehicles and other construction-related vehicles.**

**NO-7** Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding **cities**, off-site residential, school, and memorial park properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

#### 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, March 2012 prepared by Linscott, Law & Greenspan Engineers (LL&G). As stated on page IV.N-61, the project at full build out would generate 7,382 vehicle trips per day.

The City believes that the reliance of existing condition traffic data in the DEIR from 2010 (more than 2 years old) may not accurately show the true impact of the project on traffic. The increase in the number of residential units will create a substantial impact on surrounding roadways including Western Avenue. The vehicle trips will also create a negative impact on other intersections within the City of Lomita along Pacific Coast Highway, Palos Verdes Drive North, Crenshaw Boulevard, Narbonne Avenue and Lomita Boulevard. A project with a lower density (7-10 units per acre as opposed to 20+ units per acre) would be more appropriate for the subject site.

## Intersection Analysis

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

- A. Arlington Avenue (Narbonne Avenue)/Lomita Boulevard (#8)
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Page I.V.N-3 (and throughout the document) Map No. 9 should be corrected to read Narbonne Avenue/Lomita Boulevard. Arlington Avenue is located within the City of Torrance north of 240<sup>th</sup> Street.

Table IV.N-6 provides the existing (2010) summary of the Vehicle Capacity (V/C) and Level of Service (LOS) analysis conducted on the City's 4 study intersections.

- The intersection of Crenshaw Bl./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Narbonne Ave./Lomita Bl. in the PM peak period currently operates at LOS E.
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- Of particular concern is the intersection of Western Ave./Palos Verdes Drive North which under the 2017 analysis would operate at LOS F for both the AM and PM peak periods. Although the DEIR states that with the proposed mitigation measure (Trans – 5) the impact to this intersection would be less than significant, there is no specific analysis in the Transportation/Traffic section that analyzes/confirms this.
- Many of the proposed transportation mitigation measures require improvements in jurisdictions of neighboring cities and Caltrans. Have these agencies been consulted? The City of Lomita has not received any communication from the developer, traffic consultant or environmental consultant on the feasibility of mitigation measure Trans-5 relative to restriping and other modifications proposed at PV Drive North and Western Avenue.

**Should the City of Los Angeles approve the project, the City of Lomita would prefer Alternative C which proposes 830 residential units at a density of 19.5 units per acre. This would be a reduction of 305 residential units from the proposed project.**

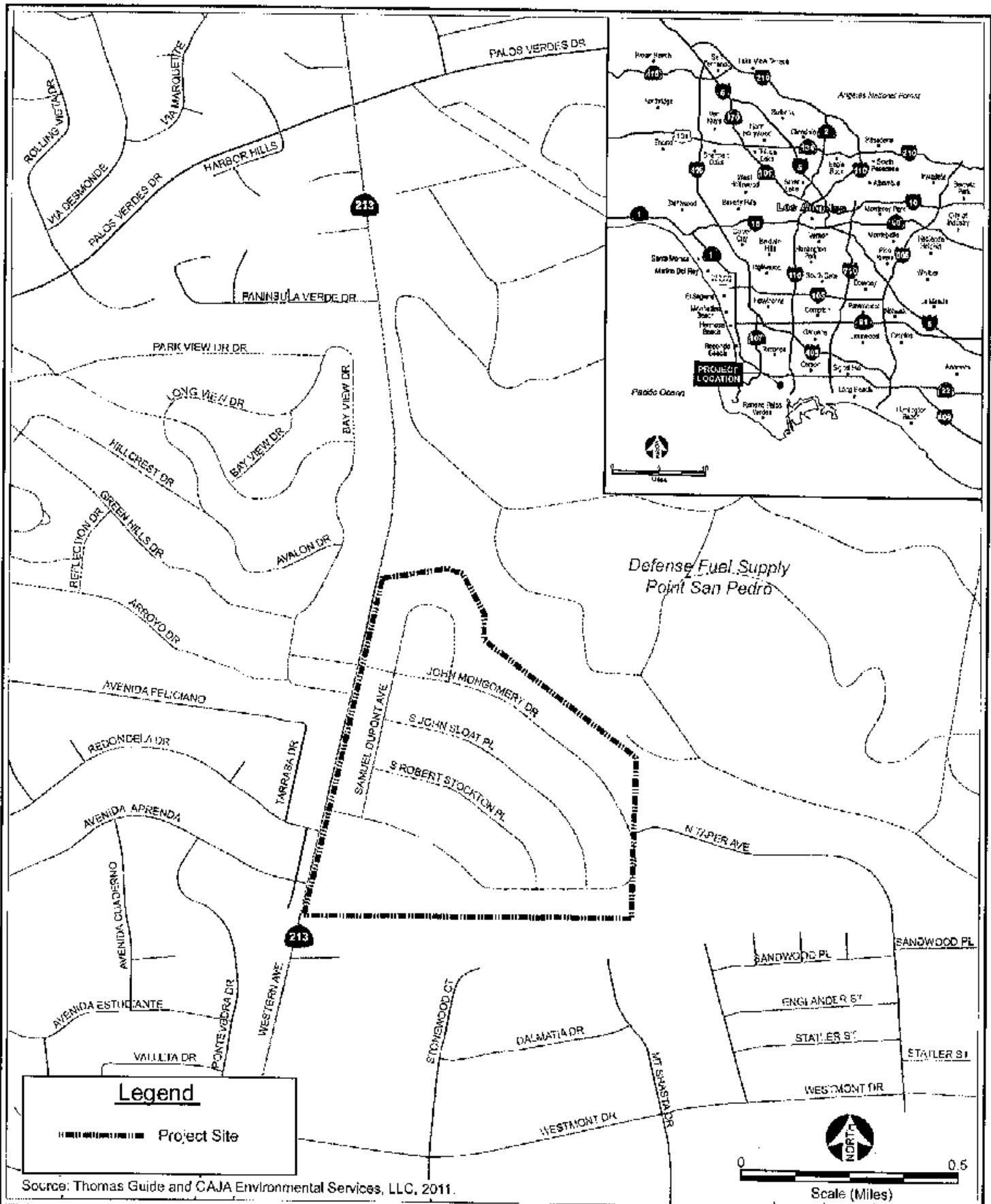
If you have any questions, you may contact Gary Sugano, Assistant City Manager at (310) 325-7110, extension 121.

Sincerely,

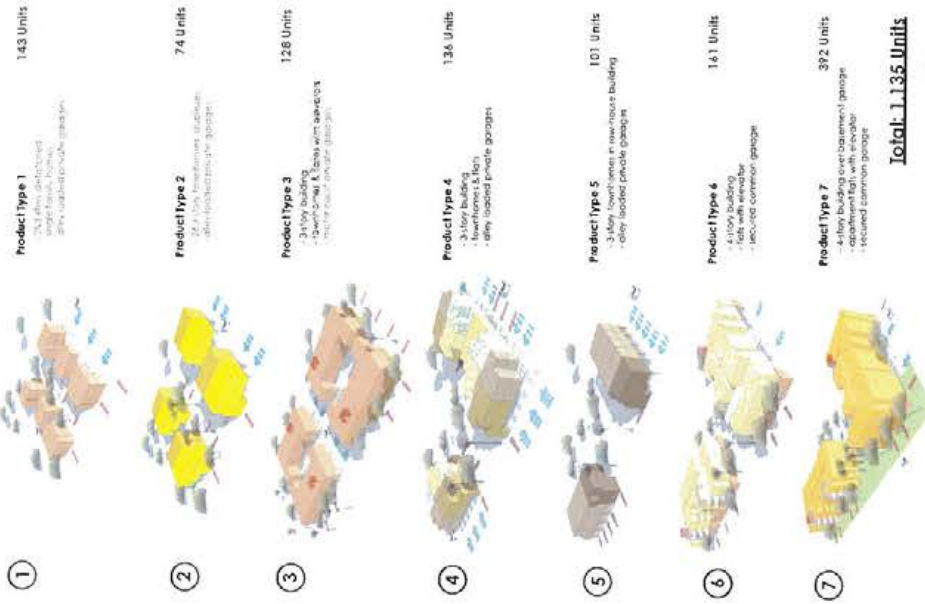
Margaret Estrada  
Mayor  
City of Lomita

CC: City Council  
Michael Rock, City Manager  
Honorable Joe Buscaino, Council District 15, 200 N. Spring Street, Room 425, Los Angeles, CA 90012  
Annette Morris, 26833 Via Desmond, Lomita, CA 90717  
Nancy Castiglione, 26248 Alta Vista Avenue, Lomita/Harbor City, CA 90710  
Ruth Herbert, 26824 Via Desmond, Lomita, CA 90717  
City of Rancho Palos Verdes, City Council and Joel Rojas, Planning Director  
City of Rolling Hills Estates, City Council and David Wahba, Planning Director





**Product Type Diagrams**



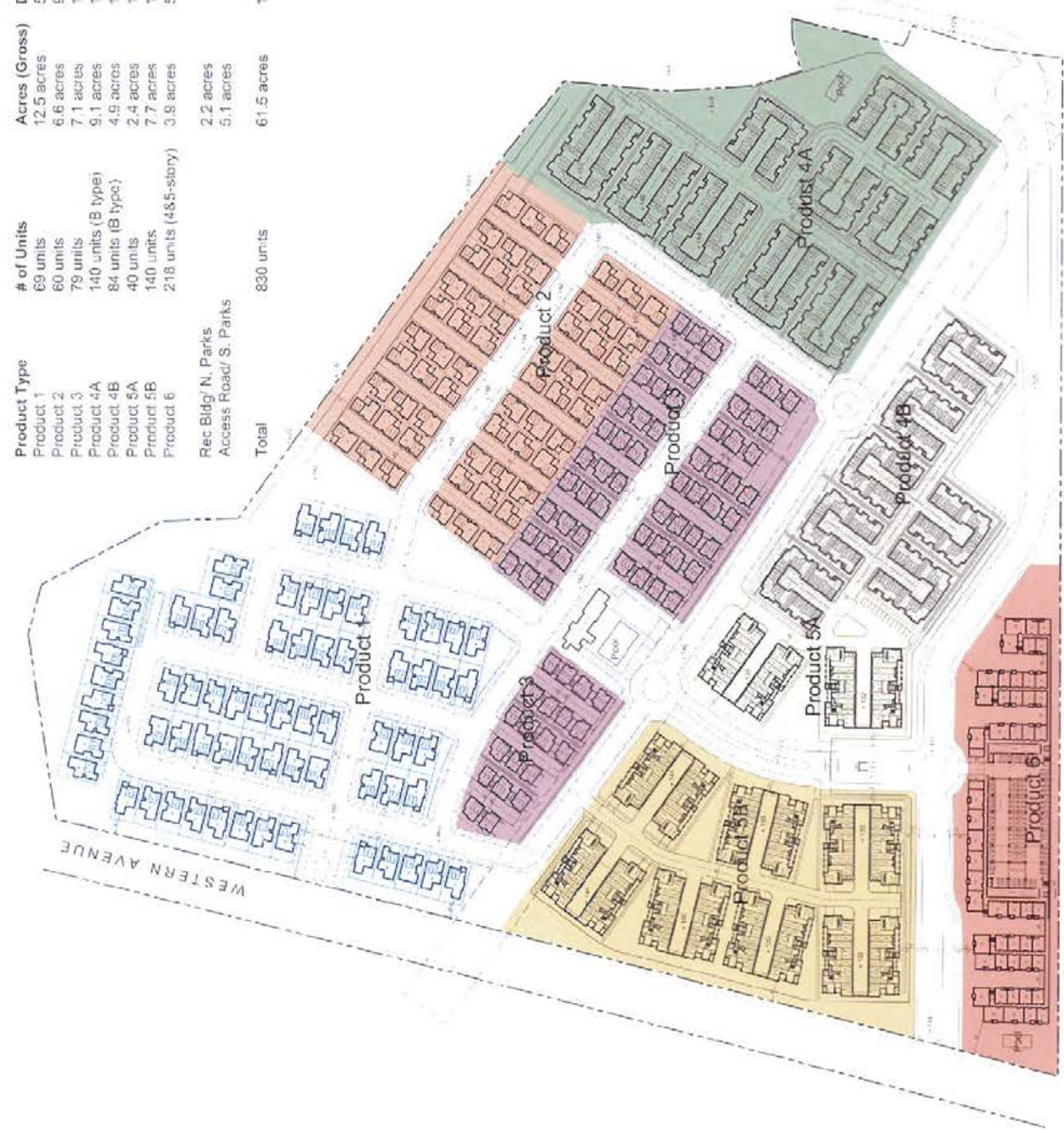
- Secondary Loop Road
- Recreation Center  
0.25 Acres
- Community Entry
- Primary Loop Road
- Bio Swale
- Community Recreation  
Center 1.3 Acres
- Community Spire Street
- Public Park  
2.8 Acres
- Open Space  
0.4 Acres
- Entry Drive
- Community Entry
- Recreation Center

Source: TCA-Architects, ValleyCrest Design Group, Fuscoe Engineering and Robert Haley Architects, October 14, 2010.



Figure II-2  
Proposed Site Plan

Product Type	# of Units	Acres (Gross)	DUI/Acres (Gross)	Acres (Net)	DUI/Acres (Net)
Product 1	69 units	12.5 acres	5.5 du/ac	8.2 acres	8.4 du/ac
Product 2	60 units	6.6 acres	9.0 du/ac	5.6 acres	10.7 du/ac
Product 3	79 units	7.1 acres	11.1 du/ac	5.2 acres	15.2 du/ac
Product 4A	140 units (B type)	9.1 acres	15.4 du/ac	7.5 acres	18.7 du/ac
Product 4B	84 units (B type)	4.9 acres	17.1 du/ac	3.5 acres	24.0 du/ac
Product 5A	40 units	2.4 acres	16.6 du/ac	2.1 acres	19.0 du/ac
Product 5B	140 units	7.7 acres	18.2 du/ac	6.5 acres	21.5 du/ac
Product 6	218 units (4&5-story)	3.8 acres	55.9 du/ac	3.9 acres	55.9 du/ac
Rec Bldg/ N. Parks		2.2 acres			
Access Road/ S. Parks		5.1 acres			
<b>Total</b>	<b>830 units</b>	<b>61.5 acres</b>	<b>13.5 du/ac</b>	<b>42.5 acres</b>	<b>19.5 du/ac</b>



Source: Robert Hidey Architects, 8/02/2011.



Figure VI-2  
 Conceptual Site Plan - Alternative C  
 (Staff Recommendation/Reduced Density)