

**CITY COUNCIL**

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December 19, 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:**

R-1 Zoning Should be Maintained

The site should maintain and be developed under the existing R-1 zoning. The approval of a specific plan would allow densities over 20 units per acre which is more in line with medium-high density residential.

### 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)
- 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

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. The City also believes that that the intersection of 262<sup>nd</sup> Street and Western should have also been included as one of the study intersections.

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.

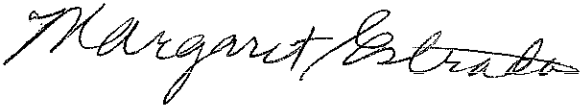
- The intersection of Crenshaw Bl./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Narbonne Ave./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Western Ave./Palos Verdes Drive North in the AM and PM peak period currently operates 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 impact to this intersection would be less than significant, there is no specific analysis in the Transportation/Traffic section that analyzes/confirms this.
- The overall impact of this development on Pacific Coast Highway for some intersections adjacent to and outside of Lomita is problematic. In particular, the intersection of Crenshaw Bl./Pacific Coast Highway (in the p.m. peak period) and Western Avenue/Pacific Coast Highway (during all study period including Saturdays) will cause significant residual traffic increases to Pacific Coast Highway within Lomita that will negatively impact LOS.
- 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  
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City of Rancho Palos Verdes, City Council and Joel Rojas, Planning Director  
City of Rolling Hills Estates, City Council and David Wahba, Planning Director