

Nicholas Hendricks
City Hall, Room 750, Mail Stop 395
200 N. Spring Street
Los Angeles, CA 90012

**Env2005-4516 NOP SCOPING COMMENTS: PONTE VISTA PROJECT,
Western Ave., San Pedro**

Thank you for this opportunity to respond to the Notice of Preparation for the proposed Ponte Vista project. The project area falls within the boundaries of the Northwest San Pedro Neighborhood Council which represents approximately 20,000 residents and numerous businesses and community organizations. Members of our Council participated in two public workshops and reviewed the Initial Study for the proposed project. At our Council's community meeting on November 14, 2005, the Council adopted the comments contained herein.

The current R-1 zoning of this property is in concert with the rest of the community. The density proposed by Bisno Development for Ponte Vista fundamentally alters, for all time, the nature not only of the immediate neighborhood, but of the entire north side of San Pedro, and sets a precedent for potentially irresponsible overdevelopment of other properties in the Harbor area.

Bisno Development proposes to build a 2,300 unit residential project on Western Avenue in North San Pedro. Bisno's projected population on this 62-acre site is 7,343 permanent residents, **a NINE percent increase in the population of San Pedro.** This huge increase would be "accommodated" **on less than one-tenth of one percent of San Pedro's land area.** Additionally, this population increase would be concentrated on Western Avenue, a state highway and one of the most overburdened stretches of public roadway in the region.

The issuance of the Initial Study implies an assumption by Bisno Corp. that there will be a change in the current zoning. We reject this assumption and oppose any change in the zoning. Additionally, we oppose the gated nature of the development, which would isolate its residents from our community.

The Los Angeles Unified School District's Facilities Committee recently recommended that the District purchase 15 acres of this property for the construction of a 2,025 student high school. A decision by the school district to use a portion of the site for a high school would clearly impact the developer's plans, and further complicate the impact of the entire development on the community. The Initial Study should be re-written to take this possibility into consideration prior to the development of the Draft EIR.

In public meetings, the developer's representatives have cited several assumptions with which we disagree. These assumptions relate to both the number of trips generated by a development such as this, especially with respect to peak morning and evening hours, and the characteristics of buyers of the project's "senior housing."

At a recent meeting, the developer's representative stated that the development would result in only 640 car trips in the morning rush hour. This seems extremely low in a community with 5,000 projected parking spaces.

Additionally, when studying a modern, active, senior population, at least three characteristics must be considered:

1. At age 55 many individuals are still employed.
2. Some seniors have their own children still living at home and others are primary care providers for their grandchildren.
3. Once retired, seniors tend to make more, albeit shorter, trips than do individuals who are working full time.

Finally, potential impacts should consider both the number of residences and the number of bedrooms.

We have significant concerns about the feasibility of the proposed project. In addition to fundamentally altering the character of our community, major issues include land use and density, traffic, pollution, infrastructure, and the quality of life for surrounding neighborhoods. Our specific comments are attached hereto and are listed in the order presented in the Initial Study.

Thank you for this opportunity to submit our comments and concerns. Please feel free to contact me at 310-831-1975 if you have any questions.

Diana Nave, President
Northwest San Pedro Neighborhood Council

CC: Councilwoman Janice Hahn
Mayor Antonio Villaraigosa
Bisno Development Corp.

ATTACHMENT

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Air Quality

The EIR should take into consideration the cumulative impact of all significant traffic generators in relationship to increased pollution. These generators include, but are not limited to, the general commuting and retail uses, potential new LAUSD high school, new Little League fields, Dodson Middle School, Crestwood and Taper Elementary Schools, Christ Lutheran School, Rolling Hills Prep School, Lomita Little League, San Pedro's legendary funeral processions to Green Hills Mortuary, seasonal traffic, new student housing for Marymount College, and access to the waterfront development under the Bridge to the Breakwater plan.

Hazards & Hazardous Materials

The proposed project has a potentially significant impact on the implementation of an emergency evacuation plan and this should be evaluated as part of the EIR. San Pedro is located on a Peninsula with basically two ways out of town, one of which is Western Avenue, a state highway. Any evacuation plans are constrained by this geography. Increasing the population by over 9% will certainly impact evacuation. Additionally, evacuation will be impacted by the new Mary Star High School, Rolling Hills Prep School, and a new LAUSD High School, should it be sited on the property. The proximity to the Navy's fuel storage site, ConocoPhillips refinery, the Port of Los Angeles, and AmeriGas all add to the need for good evacuation capacity.

As discussed under the traffic section, the increased traffic will also have an adverse effect on the ability of emergency vehicles to navigate Western Avenue in the event that there is a hazardous incident..

Hydrology & Water Quality

The hydrology should be evaluated in terms of the potential impact on the storm drains that carry runoff from the property underneath Gaffey Street. This community has recently experienced the collapse of three existing storm drains where they cross Western Avenue. Additionally, we regularly experience flooding during rains at several points along N. Gaffey St. Any study of development impact should look at N. Gaffey from the Navy Fuel site to the I-110 off-ramp/I-47 on-ramp and to Channel St. and North Pacific Ave. The impact should also be studied downstream as the storm drain re-surfaces on N. Gaffey and empties pollutants directly into the Los Angeles Harbor.

Potential mitigation measures related to hydrology and water quality include the following:

- Greening of the portion of the storm drain which runs parallel to N. Gaffey and flows directly into the Los Angeles Harbor to improve water quality
- Funding of proposed water quality improvement measures in the Peck Park Canyon, the runoff from which flows directly into the Los Angeles Harbor.

Land Use and Planning

The potential for conflict with any applicable land use plan (9.b.) should be considered “potentially significant.” The proposed project would increase the overall population of the San Pedro community by approximately 9%. This is a potentially significant impact which cannot be mitigated.

The discussion indicates that “multiple family housing is not a new area use and is found throughout the area. For example, the project site is located directly adjacent to two multiple-family housing complexes...at densities of...72...and...49 dwelling units per acre....” Although this is technically correct, it is an exception and not indicative of the character of the predominantly single family community and, unlike the property which is the subject of this study, the existing condominiums are on land zoned commercial.

The Gardens, straddling Westmont Dr., which is also cited in the Initial Study, is considered one of the highest density projects in the area at 13.4 units per acre. As proposed Ponte Vista would be three times that density.

The area is primarily a single family community, consistent with the zoning of this property. Any review of the current condition must consider not only the portion of the community which is in San Pedro, but the adjacent Rancho Palos Verdes properties all of which are single family.

Population and Housing

The proposed project would add approximately 7,343 new permanent residents, an increase of approximately 9% in the population of San Pedro. This is in addition to approximately 1400 proposed new housing units currently on the drawing board, many of which have not yet reached City Planning.

The Initial Study indicates that the proposed project would represent a net increase of 2,055 units and 6,463 residents. This is based on the fact that prior to 1999 there were approximately 245 occupied residential units on the property. The EIR should be based on the entire 2,300 units and estimated 7,343 new permanent residents. By the time this project is built it will be nearly 20 years since those units were occupied. Therefore all impacts will be above and beyond the current status which is “0” residents.

We are aware of the following proposals for approximately 1400 new residential units in San Pedro:

- JCC Homes proposal for approximately 135 houses at Gatun and Gaffey,
- 135 Condominiums at 28000 S. Western Ave
- 116 Centre Street Lofts, 666 S. Centre
- Palos Verdes Housing, 330 town homes, 550 S. Palos Verdes
- La Salle Adaptive Reuse 26 lofts; 245-255 W. 7th St.;
- Bay View 216 Apts; 255 W. 5th
- Ocean View 144 Lofts, 111 & 203-233 Harbor Blvd.
- 12 condominiums at 815 S. Grand Avenue,
- Harborside Terrace 16 Homes at 303 – 308 N. Palos Verdes
- 30 Townhomes, 281 W. 8th St.
- Palos Verdes Housing, 330 townhome condominiums , 550 S. Palos Verdes St
- 25 condominiums, 420 --430 W. 9th St.
- Sepia Homes, 90 condominium units, 812 S. Pacific
- Approx 27 new homes off Goldenrose

A recent study by the Urban Land Institute (ULI) found that San Pedro could accommodate about 3,000 additional housing units. As proposed, Ponte Vista would represent 75% of that number. Adding the proposed 2300 at Ponte Vista to the 1400 identified above would result in 3700 new units, even if no additional new units are proposed elsewhere in San Pedro.

Additionally, there are new condominiums under construction at the intersection of Anaheim and Gaffey, and already overburdened intersection.

Public Services

Using the baseline of “0” residents, the addition of 7,343 new residents should be evaluated as having “significant impacts” on all public services, including parks. To say that there will be a “less than significant impact” on parks assumes that residents will segregate themselves from the community and that they and their children will not use the existing park and recreational facilities, will not go to Cabrillo Beach, and will not participate in organized sports.

Quimby fees generated from this project should not be applied to recreational amenities that are not provided for the public. This would include any fields that are exclusively for the use of the Little League.

With regard to impact on schools, it is important to consider not only the potential need for additional school facilities, but where they could be located. There is very little vacant land available in San Pedro, and if an additional school is found to be needed as a result of this development, the EIR should address potential locations.

Recreation

As discussed above, it is anticipated that 7,343 new residents will have a potentially significant impact on parks and other recreational facilities and that such use could accelerate the physical deterioration of these already overcrowded facilities. The construction or expansion of recreational facilities to accommodate the impact of the additional residents and their guests could have an adverse physical effect on the environment and this should be evaluated as a part of the EIR.

The impact on non-public recreational facilities, such as the YMCA and the Boys' and Girls' Club, which are already stretched to the limit, should also be considered.

Transportation/Traffic

Without a doubt this is the area of the most significant actual impact. Western Avenue is already nearing gridlock at certain times. Current gridlock will be exacerbated by the opening of the new Mary Star High School, student housing for Marymount College, Rolling Hills Prep School, and the proposed Little League Fields, all of which are under development. The potential addition of a new 2,025 seat high school by LAUSD must also be taken into consideration when evaluating the traffic impacts. Additionally it must be remembered that Dodson Middle School, Crestwood Elementary, Taper Avenue, and Christ Lutheran School also must be accessed from the same portion of Western Avenue thus adding to the concentration of traffic during the same peak times. Western is also the primary route that area residents use to access shopping areas beyond San Pedro such as Del Amo Mall and The Avenue in Palos Verdes. Additionally the Green Hills Cemetery located directly across from the subject property is well known for large funeral processions that create significant traffic tie-ups.

The implications of this gridlock on the operation of emergency vehicles must also be evaluated. At the same time, we would anticipate a higher than average increase in the need for such vehicles due to having 25% of the housing set aside for seniors. Emergency vehicles coming into the property will also need additional time to maneuver the locked gates.

The evaluation of traffic impacts should take into consideration the cumulative effect of a combination of events happening at the same time. For example, what if the new high school and Mary Star high school both have a football game at the same time and there is also a funeral procession and a Little League game?

Traffic impact must also consider the number of short trips that are made, all of which require the use of Western Ave. Residents continually take short trips to the grocery store or dry cleaners and drop-off and pick-up children up from school and sporting practices. The review of traffic impacts must also take into consideration the back-up which will be caused by the "gated" community entrances.

We are concerned about how the projected trip ends figures are generated. At a recent community meeting, the developer's representative stated that the proposed project would only generate 640 morning rush hour trips. We strongly disagree, given that we anticipate approximately 4,000 adult residents, most of who will be employed and/or involved in transporting children to school.

The list of intersections included in the traffic study should be amended to include the intersections of Gaffey/ Channel and Park Western/Western.

A 2004 study conducted by Meyer, Mohaddes Associates for the Port of Los Angeles found the following existing AM/PM Peak Hour conditions of "D" or lower at intersections included in their study: Gaffey/Channel PM "E" Figueroa/Pacific Coast Highway, AM "F" and PM "E", Figueroa/Anaheim AM "F" and PM "D", Gaffey/Miraflores/I-110 SB Ramps AM "E" and PM "D", Anaheim/Figueroa/I-110 Ramps AM "E" and PM "F", Western/Sepulveda AM "E" and PM "F", Western/Pacific Coast Highway AM "F" and PM "F", Western/Palos Verdes N. AM "D" and PM "F", Western/Westmont PM "E", Western/Capitol PM "D".

Additionally the recent Western Avenue Task Force Report provides very specific data regarding the LOS at various times of the day for Western Avenue intersections and should be reviewed as part of the EIR.

The proposed 55 parking spaces to serve the four little league baseball diamonds are woefully inadequate and would leave nearly 200 cars without parking. With approximately 15 youth on each team and 4 fields about 120 youth may be playing at the same time. Additionally, during the last half hour of one game and the first half hour of the next game there is a 100% overlap, resulting in 240 youth at certain points in time. Assuming only one car per family, we calculate a minimum of 240 cars competing for 55 parking spaces. In addition to creating a parking shortage, this will increase the traffic impact on Western Avenue as people "hunt and wait" for parking spots.

Utilities & Service Systems

As stated previously, the net impact must be based on the entire number of homes, 2,300. The utilities infrastructure is already strained. If a new substation or upgrades are required, the developer should be required to pay the associated costs and provide the necessary land.