



## Northwest San Pedro Neighborhood Council

"Your Community Voice"

January 7, 2013

Erin Strelch  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**Diana Nave**  
President

**George Thompson**  
Vice President

**Scott Allman**  
Treasurer

**Katie Marrie**  
Secretary

### **NORTHWEST SAN PEDRO NEIGHBORHOOD COUNCIL COMMENTS ON ENV-2005-4516 DRAFT EIR COMMENTS: PONTE VISTA PROJECT 26900 S. WESTERN AVE, SAN PEDRO**

Dear Erin,

Thank you for the opportunity to respond to the Draft EIR for the proposed Ponte Vista project. As can be seen from the address, the property is located within the community of San Pedro even though it is in the Wilmington Harbor City Community Plan area and is located within the boundaries of the Northwest San Pedro Neighborhood Council (NWSPNC). NWSPNC represent approximately 20,000 residents and numerous businesses and community organizations. At a Special Meeting on January 3, 2013, our Board, by resolution, unanimously adopted the comments contained herein.

The NWSPNC has followed and participated in the review of the project since the original proposal was submitted by Bisno Development. The current project was presented by the applicant at our November Board and Community Meeting and their Traffic Consultant presented the traffic study and proposed mitigations at our December Board Meeting. Our Planning and Land Use Committee also met at least three times with their representatives made suggestions during the development of the traffic study.

Just prior to the release of the DEIR we requested a 90-day comment period. We remain frustrated and discouraged by the denial of this request, particularly in light of the fact that the most of the review period was consumed by the Thanksgiving, Hanukkah, Christmas, and New Year Holiday Season. Furthermore, it is our contention that the time for review did not comply with the early warning provision of Charter Section 907, requiring sufficient notice so that

Neighborhood Councils will have “...a reasonable opportunity to provide input before decisions are made”. Even more concerning however, is the lack of sufficient opportunity for the community at large to comment on an environmental document for a controversial project that will have such a significant impact on San Pedro, Harbor City and Wilmington.

While this DEIR is an improvement over the document prepared by the previous developer, it is seriously flawed. Furthermore, the project evaluated does not appear to be the project that is proposed to be built. This complicates and skews the review process.

The proposed project does not appear to be a good fit for the community nor for this geographically unique property. We have problems with the underlying assumptions and conclusions in the DEIR mainly relating to traffic, social services, utilities and service systems. Because the analysis is built on faulty assumptions, it is in effect a “house of cards,” and all conclusions based on the analysis are also faulty. We also are concerned with the lack of amenities provided on site, and the lack of any attempt to address the substantial environmental impacts through project design.

Among the fundamental deficiencies in the DEIR are the following:

1. The rezoning request will impair the orderly implementation of Regional Plans, City’s General Plan, and two Community Plans. Additionally it fails to evaluate Public Health and Social Impacts and conformance with the ten Urban Design Principles and the Walkability Checklist.
2. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single-family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and in the former CRA project are in downtown San Pedro, thereby undermining a major community effort to revitalize this area, the heart of our community.
3. The proposed project is not a good fit for the location. It is not in a transit oriented area. The gated community and mix of housing types are not appropriate. The proposal fails to integrate walking, biking, and public transit. If built as proposed, residents would need to use their auto for everything. This over-dependence on cars has Green House Gas, energy, and health implications and would isolate residents who do not drive, eg. kids, elderly, and the disabled, within a gated subdivision. Further, the development would not improve the local jobs housing balance.

4. Alternatives B, C, and D ignore the present zoning which includes 15 acres of open space. This is an especially egregious oversight in alternate B because it claims to be a “no project” alternative, i.e. buildable as a matter of right. In fact, units cannot be built on that portion of the property zoned as open space.
5. The traffic analysis uses incorrect assumptions about V/C ratios and traffic generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, that is not related to San Pedro in any way. Further, none of the proposed Alternatives consider on-site features to mitigate mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.
6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.
7. The analyses and proposed mitigations for Greenhouse Gas Emissions, Hazardous Materials, Public Services, and Utilities and Service Systems are inadequate and flawed. They must be revised.
8. The DEIR does not adequately consider the alternatives. It focuses almost exclusively on the 1135 unit project despite identifying Alternative C with 830 units as the environmentally preferred alternative, and inadequately analyzes Alternative B, for 385 units, despite its having even fewer environmental impacts. No meaningful public amenities are proposed. The proposal fails to make a compelling case for why a special exception should be made to allow the applicant more than its share of units allowed by right.
9. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project while creating an open an accessible neighborhood that represents the values of San Pedro community. We suggest a mixed-use neighborhood project alternative that includes access to Mary Star, traditional single-family homes on appropriately sized lots that allow reasonable private open spaces for families that live in these homes, with work centers, commercial space, senior friendly facilities, a range of public open spaces including a 6-acre public park that complies with the City Recreation Plan, and a library extension to meet State Guidelines for library space.

The objective of the EIR is to disclose the significant impacts of proposed actions, to identify meaningful alternatives and mitigation measures to avoid or reduce environmental damage, and to enhance public participation in the planning process.

In this case, the DEIR relies on outdated, inaccurate, incomplete, inadequate, confusing, and often misleading information that does not help the advisory- and decision-making bodies make an informed decision. A meaningful alternative to a gated subdivision with no public space would be an open an accessible neighborhood with public open spaces and amenities, not unlike the many wonderful neighborhoods in the San Pedro community -- sadly, this option was not evaluated. Ponte Vista may very well be the last of the largest neighborhoods to be developed in the San Pedro community -- the tone set by this development will resonate in the development of smaller infill and redevelopment sites. It is no surprise that the people of the community want to be involved -- they want to be engaged in a meaningful way. Rather than simply react to one scheme or another they want the project designers to help them shape their vision that is also economically viable and rewarding for the developer who is taking the risk. It is this collaborative manner that we can move beyond just another gated subdivision to create a unique place for San Pedro Community.

It is in no ones best interest to see this land continue to lie fallow. We support the City's efforts to promote economic development and to streamline development review. However, in its current flawed design and environmental documentation, this project has the potential to disillusion neighborhoods towards any growth or economic development -- if this is growth and progress, lesser is better.

Please consider the points raised in this cover letter as comments on the DEIR in addition to the attached comments that follow the order in the DEIR. Thank you for this opportunity to submit our comments and concerns. Contact me at 310-831-1975, if you have any questions.

Diana Nave, President  
Northwest San Pedro Neighborhood Council

Enclosure

CC: Councilman Joe Buscaino  
Olive Reed, President, Harbor City Neighborhood Council  
Cecelia Moreno, President, Wilmington Neighborhood Council  
Linda Alexander, President, Central San Pedro Neighborhood Council  
June Smith, President, Coastal San Pedro Neighborhood Council  
Ponte Vista Development Team