C. PROJECT CHARACTERISTICS

The DEIR identifies Alternative C, for 830 units, as the “environmentally superior” alternative yet it almost exclusively analyzes the 1135 unit proposal. The applicant obviously expects that any impacts of the denser Alternate will apply to the less dense alternate. This is questionable, especially in terms of project characteristics and proposed mitigations. The DEIR must be revised to evaluate impacts for 830 units to foreclose any interest from this or any future owner to increase the intensity back up to 1135 units without triggering another entitlement application.

Similarly, Alternate B is identified as an even less impactful alternative but no real analysis of it is made. Finally, Alternative D, Revised Site Plan, would develop the site with the same 1135 units as the Proposed Project, however, “In order to accommodate the required set backs…the mix of product types…would be altered…{and} the 2.8 acre public park would not be developed….” The application should be amended accordingly.

Also, none of the three Alternatives evaluates the impact of SB 1818 on unit count, population, schools, traffic, services, etc. Since SB 1818 allows the developer to increase the number of units as a matter of right at any time after entitlement, either the applicant needs to show conclusively how SB 1818 does not apply to its application or it should account for the potential impacts of the legislation on its project. This is especially important because the applicant has made it clear it is a speculator and intends to sell the parcels once they are entitled.

Specific Plan Zoning

A Specific Plan is proposed with Low Medium and Medium density zoning. The DEIR generalizes overall zoning for the entire project, not each individual element. Each parcel within the development should have a specific zoning density attached to it. Individual densities would allow a closer examination of how to create contextual intensities particularly along the edges of the proposed subdivision.

The proposed zoning is vague. For example, the proposed single-family units are not the traditional single-family homes that one finds in an R-1 zone. Rather they are essentially the type of housing found in areas zoned RD 1.5 and higher.
The apartment buildings need to have a specific zoning that is applicable to the actual size and density of the proposed development. A Medium density by City of LA codes extends all the way to R-4 zoning which is comparable to the density on Fitness Drive, the 6-acre parcel between the Commercial Shopping Center and the Ponte Vista Property. Figure II-10, Parcel 7 should be zoned specifically for their proposed density, not the medium density. The apartments should be capped at R-3 or lower to provide for an appropriate transition from the development on Fitness Drive to the lower density units directly to the north.

**Private Roads**

The DEIR (II-17) states "With the exception of the ...road...providing access...to Mary Star of the Sea High School, all other streets on the Project Site would be private and access would be provided through two gated entrances...." In order to better incorporate this project into the surrounding community and provide better emergency ingress and egress, the roads should be dedicated public roads. The road areas should not be used in the calculation of units per acre.

**Open Space**

The DEIR (II-18) states that “approximately 33 percent of the projects post development acreage would consist of landscaped common areas ... and parks (excluding roads) ... “Open space would include an approximately 2.8 acre park....” Since the park has been deleted from the viable alternatives this statement should be rewritten.

This same section references the provision of 102 parking spaces for use by park visitors and other visitors to the site. With the deletion of the public park, it appears that the public parking spaces have also been deleted. The DEIR should be corrected to reflect this change.

Figure II-8 shows a 1-acre mitigation area within the public park. Since the public park has been deleted, what happens to the mitigation area?

**Building Heights**

The description of building heights as 40'-48' does not match the two- to three-story buildings. This is the building height for four-story buildings. Also, the height calculation should be specific to the individual housing types and their locations within in the project.

**D. CONSTRUCTION CHARACTERISTICS**

The DEIR states (II-33) that “the construction of the project is estimated to begin in 2013 and would continue over a five-year period, with completion in 2017.” There are many references to this 5-year time frame throughout the DEIR. Since the
applicant has requested a 15-year Development Agreement, these references should be changed to indicate a 15-year build-out and the construction phase impacts addressed accordingly.

Table II-3 indicates that the construction of the Public Park and the Landscaping and Streetscape Improvements would be done in the final year of the 5-year build-out. Completion of a public park and the landscaping and streetscape improvements on the exterior of the project should be required prior to occupation of any unit.

P II-34 states “…construction staging, laydown areas, and all construction equipment would be positioned on-site and would be moved from area to area on the Project Site, consistent with the sequence of Project construction.” Since the project anticipated different developers for each area it is not clear how would this work? The mitigations need to address the actual impacts.

E. PROJECT OBJECTIVES

Project Objective 6, “To develop a project that fiscally benefits the City of LA.” Is not supported. In order to determine if this project fiscally benefits the City of Los Angeles it would be necessary to do an economic impact analysis of projected revenues and costs for each of the alternatives. This should include looking at the property tax, sales revenues that would be within the City of Los Angeles, and long term costs to the City for services such as Police, Fire, and utilities. This objective should either be removed or factually supported.

SECTION III. ENVIRONMENTAL SETTING

B. OVERVIEW OF ENVIRONMENTAL SETTING

The Local Setting description (III-3) should be modified to include the approved 76 unit Volunteers of America (VOA) Navy Village which will be located immediately to the North of the project and will provide housing for homeless veterans and their families. Additionally, the discussion of the proposed future Marymount College educational facilities should include an analysis of their planned expansion at this site into a full four-year college campus with room for 800 residential students, 1500 total students, and 75 full and part-time faculty.

Please add the following City of Los Angeles Projects to Table III-2 (III-23) Cumulative Projects and reanalyze cumulative project impacts accordingly. These projects will generate considerable traffic impacts that were not included in future traffic and school calculations:
Southern California International Gateway (SCIG)

APL Terminal expansion

Ports O’Call Redevelopment

Cabrillo Marina Phase II

USS Iowa

Los Angeles County Sanitation Districts Clearwater Outfall Project

Rolling Hills Prep School build out from 250 students to 1,000 students

VOA Navy Village

Pacific LA Marine Terminal

Harbor Highlands Development (under construction)

City Dock 1

Port Master Plan update

Marymount College Expansion on Palos Verdes Drive North

San Pedro Community Plan update

G. GREENHOUSE GAS EMISSIONS

Background

The State of California has declared that greenhouse gases (GHGs) constitute “a serious threat to the economic well-being, public health and the environment of California.” (AB 32). It recognizes that allowing them to remain at current levels will not adequately address the dangers they pose and has established instead the goal of reducing them to 1990 levels by the year 2020 (AB 32).

The City of Los Angeles has embraced the effort. It adopted “Green L.A.: An Action Plan to Lead the Nation in Fighting Global Warning” in May 2007, in which it proclaims that by 2030 it will reduce GHGs from city operations 35 percent below 1990 levels.
Three gases are felt to pose the greatest threat: carbon dioxide, methane and nitrous oxide.\textsuperscript{1} The primary cause of GHG pollution is combustion of fossil fuels.\textsuperscript{2} In California, fossil fuel use is closely related to motor vehicle use.

**Emissions**

According to the DEIR, this project will not reduce GHG pollution to 1990 levels. Indeed, it will not decrease GHGs at all. To the contrary, it will increase them. The site currently generates no GHGs (p. IV G-4). According to the developer's projections, the proposed project will generate 15,620.55 metric tons of GHGs each year.\textsuperscript{3} That is 15,620.55 more metric tons or 17,222 more American “short” tons of pollutants every year for the foreseeable future than are generated at the present, 172,220 short tons over 10 years, 344,440 short tons over 20 years, etc. This single fact should overshadow all others for anyone considering the project's impact on this insidious form of pollution.

The DEIR does address the 35 percent reduction that the City of Los Angeles seeks to achieve. Moreover, it dwells on minimal reductions such as emissions from landscaping equipment and the fact that the project’s structures are designed with large “contiguous unobstructed roof areas” which can accommodate solar panels. Large flat “roof areas” can be found on many structures and hardly constitute a “green” breakthrough. What is more, the proposal does not provide for the installation of solar panels on any of the project’s roofs.

**Proposed “Reductions”**

Most significantly, the DEIR’s claim that the project will reduce GHGs by 14.579 percent is based upon faulty analysis. As already noted, this project will produce 17,222 more tons of polluting gases each year than are being generated now (the proper baseline). The 14.579 percent is calculated by comparing the estimated carbon dioxide levels generated if the project were to be "built as usual," that is without any GHG reduction measures, (which would never be permitted and is, therefore, purely illusory) with levels of GHGs generated by the project they propose. What is more, it will generate more GHGs than if the project were built to comply with the parcel's existing R-1 and open space zoning.

Missing from the report is any meaningful discussion about GHG generation once the project is built and occupied. This period will most likely stretch over decades.

\textsuperscript{1} California Technical Advisory: CEQA and Climate Change, June 19, 2008 – hereinafter “Technical Advisory”
\textsuperscript{2} Technical Advisory, p. 2
\textsuperscript{3} It is curious that the DEIR uses the metric system at this point. A metric ton weighs considerably more than the "short ton" most Americans are used to working with – 2,205 pounds instead of 2,000. Accordingly, 15,620.55 metric tons translates to 17,222 tons of polluting gases.
Emissions from Autos

According to the DEIR (Table IV.G-5) fully 74.5 percent of the projected carbon dioxide emissions (11,593.77 metric tons or 12,782 tons) will be from motor vehicles, yet there are no proposed measures to reduce these emissions.

One measure available for a developer to mitigate the amount of driving and the pollution associated with it is to place its project near existing public transportation corridors and close to employment centers. That has been the model for development in downtown Los Angeles in recent years. Unfortunately, Ponte Vista does neither. As discussed elsewhere in this document, bus service along Western Avenue is infrequent and inconvenient and hardly constitutes a satisfactory substitute to commuting by car. Any doubts about this statement can be satisfied simply by trying to take public transportation from the bus stop at Western Avenue and Westmont Drive to downtown Los Angeles, to one of the office buildings along Hawthorne Boulevard in Torrance or even to the port area.

What is more, the project is not near any major employment center. Nor is that likely to change. The recently drafted San Pedro Community Plan does not anticipate adding any major commercial centers in the area during the next 20 years. In short, residents of the proposed project are likely to have to commute considerable distances by car to work.

As discussed elsewhere in this document, the project contains virtually no amenities (except the pool and clubhouse) or design considerations that would lessen the need to use ones auto. In fact, it even contemplates the use of the auto to get to the clubhouse and pool as shown by the proposed parking plan.

The report does note that the project will provide recharging outlets to those residents who own electric cars. Although commendable, sales of such vehicles are miniscule. Absent some technological breakthrough in battery life and the driving range of these cars, they are likely to remain so.

Responsibility

The applicant tries instead to rationalize away the need to even address the GHG problem concluding that no single development is likely to have a significant impact on GHGs (pps. IV G-15 and 27). Since the problem is planet-wide, that is probably true. Given the Earth’s vast size and total population, it might even be true for a vast open pit mine in Alberta, Canada or in Australia’s outback. However the fact remains that the project will generate substantial amounts of GHGs each year. Moreover, the applicant’s line of reasoning implies that since no single person, project or business can be held responsible; none need take responsibility for them. That way of thinking must stop now or there is no chance

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4 Despite the fact that the Project is located near the Port of Los Angeles, many of the Port jobs are a significant distance from this site. Furthermore, the San Pedro Community Plan Area has a huge deficit in jobs with a job housing ration of 0.44
of dealing with these pollutants. Only by forcing each project to confront and address the issue properly will there be any hope of reducing GHGs and the threat they pose.

The analyses of the green house gas emissions and associated mitigations are inadequate and must be revised.

See also our comments under Traffic and Transportation.

H. HAZARDOUS MATERIALS

The DEIR is selective about its risk assessments, particularly as regards the Defense Fuel Support Point (DFSP) and the Rancho LPG Holdings.

The DEIR says that a risk assessment was done for events, spills, fires, etc. at the DFSP (directly adjacent to the Project), and notes that “Although larger than medium-sized spills would result in a larger zone of impact if they were to ignite, potentially encompassing portions of the Project Site, the emergency access features of the Project coupled with the remote nature of such an extreme event would result in a less than significant impact to future Project residents.”

It is insufficient and negligent to say the emergency management plan is that fire companies can enter through two access points on Western and through one access point from Taper through Mary Star of the Sea High School and that the Project is within a 4-mile drive of several hospitals.

The DEIR says “implementation of the Project Design Features would require that evacuation and emergency response procedures be established in an emergency response plan for a fire impacting the Project, and the consequent risk posed to Project residents would be minimal.” It is puzzling that the applicant can conclude that the consequent risk is minimal before the emergency management plan has been developed.

With regard to the Rancho LPG facility, the DEIR notes that “to a much lesser extent there may be some quantifiable risk of upset from other activities such as product delivery by rail or truck...Based on the worst-case RMP scenario and with the more likely releases having a much smaller radius impact than 0.5 miles, there would be no impact to the project site.” This analysis under estimates the potential impact to the Project Site, endangering the safety of future residents, with no proposed mitigations. The US DOT report of butane incidents by Means of Transportation found that there were 751 rail incidents and 13154 truck incidents in 2003 alone. This is far from an insignificant risk. In many respects, it would be far more accurate to say that “it is just a matter of time” before a significant incident occurs.
In addition, Tosco Refining Company’s Risk Management Plan for what is now the Phillips 66 refinery contains a worst-case scenario (Attachment A) for a butane incident with a 2.3-mile impact, way beyond the Ponte Vista site. An additional proof that the risk is far from insignificant is shown in the linked video showing a 60,000-pound LPG rail tank car being hurled three quarters of a mile once it caught fire.\(^5\)

It is insufficient to simply state that the risk is “extremely remote” if the DEIR admits that a larger than medium-sized spill were to ignite it would potentially encompass portions of the Project Site. The DEIR must discuss the potential effects of a larger than “medium-sized spill” and evaluate the hazards to residents, not just waive the obligation to consider the impacts on the environment. **What else will the Project do to mitigate the effect on residents of a larger than medium-sized spill?**

**Evacuation Routes**

According to CEQA Guidelines, the Project would have a significant effect on the environment if it would “impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.” The DEIR erroneously states that there would be no impact with regard to this guideline.

The DEIR asserts “The Safety Element of the General Plan of City of LA pertaining to response to disaster events does not designate Western Avenue within the vicinity of the Project as a designated disaster route.” Western Avenue only south of Summerland is designated as a disaster evacuation route. It also states that Western Avenue is “too far west” for evacuation from the Port and that the City of Rancho Palos Verdes (RPV) does not consider Western Avenue as an evacuation route. These assertions are misleading.

Western Avenue north of Summerland is not shown on the evacuation routes map of the Safety Element of the General Plan of the City of LA, because the map only shows the portion of Western Avenue that is under the jurisdiction of the City of Los Angeles. On the map, areas that are not under the City’s jurisdiction are in grey. (See Attachment B) Western Avenue from Summerland to Pacific Coast Highway is under the jurisdiction of Cal Trans, not the City of Los Angeles. Western Avenue between Summerland and Palos Verdes Drive North is not shown as an evacuation route on the City map because it is not “in” the City of LA, not because Western Avenue is not an essential evacuation route; the DEIR is doing a selective interpretation of the map, and the result is not credible.

Further, asserting that Western is “too far to the West” for an evacuation route ignores the fact that San Pedro has only 3 north/south evacuation routes (Gaffey Street, the 110 Freeway (adjacent to and accessed by Gaffey and Harbor Blvd.), and Western Avenue. If any of the 2 non-Western-Avenue routes is blocked (note

\(^5\) See [WWW.YOUTUBE.COM/WATCH?V=XF3WKTWHPIU](https://www.youtube.com/watch?v=XF3WKTWHPIU)
that a portion of North Gaffey Street and a portion of Harbor Blvd. are in liquefaction zones), Western Avenue may be the only available evacuation route. San Pedro with the Port operations, storage of hazardous materials, and location on earthquake, liquefaction, and methane zones, is for more apt to need to evacuate that any other location in the City of Los Angeles.

The DEIR also misinterprets the Port evacuation plan. Western Avenue may be too far west for evacuating the Port itself, but it is one of the two, and probably the main evacuation route for San Pedro and the adjacent cities particularly in the event of an incident at the Port.

The “entire city of Rancho Palos Verdes, excluding the portion of the City located east of Western Avenue (approximately 98 acres) is classified as a VHFHSZ [Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection] and in 2009 alone 2000 residents of RPV were forced to evacuate their homes because of wildfires. For the residents of RPV on the west side of Western, Western Avenue is the only evacuation route available to them. It is not credible to assert that Western Avenue north of Summerland would not be an evacuation route for RPV residents.

Anecdotally and based on empirical observation and on comments of emergency responders at Rancho Palos Verdes Council meetings, congestion on Western Avenue at the present time can be a significant interference with emergency responses. It is not unusual to see LA County emergency vehicles going northbound on the south bound side of this divided highway or vice versa due to the extreme level of congestion.

San Pedro has really only three viable evacuation routes. One is North Gaffey Street, which is adjacent to these potential hazardous facilities: Rancho Holdings, the Defense Fuel Supply Center, and the Phillips 66 Refinery. North Gaffey sits on earthquake faults and the potential for a fire is great. In addition, the LAFD (and LAPD) could easily have Gaffey Street blocked due to potential fire and certain damage from an earthquake as they did when there was a power outage near Home Depot.

The second principal evacuation route is the 110 Freeway. The City has indicated that in an emergency, this might be turned into a southbound access way for emergency vehicles. That leaves Western Avenue as the primary or only avenue of escape for all 83,000 San Pedro residents, not counting all the Rancho Palos Verdes residents who would also need Western Avenue for evacuation. Western Ave. is already clogged during peak hours. It cannot function as an adequate, viable evacuation route.

The LA City Comptroller Wendy Greuel said in her 2012 report that the Salvation

6 Safety Element of the City of RPV General Plan, adopted June 2010
Army and the Red Cross are not prepared to handle an evacuation of the City of Los Angeles. This would particularly apply to an isolated area like San Pedro, surrounded on three sides by water and with very limited egress routes. In a disaster, San Pedro could quickly face serious challenges.

Further, the assertion that “traffic will be controlled in the vicinity of the Project” in the event of a disaster raises a concern that traffic attempting to travel north on Western Avenue and out of San Pedro and Rancho Palos Verdes will be delayed while Ponte Vista security attends to Ponte Vista and makes sure it is evacuated first. **This will produce an unacceptable situation and must be addressed in the DEIR.**

The jurisdictional boundary problem cannot be an excuse. **The project’s impact on evacuation routes must be reanalyzed and appropriate mitigations developed.**

**J. LAND USE & PLANNING**

The rezoning request will impair the orderly implementation of Regional Plans, City’s General Plan, and two Community Plans. The DEIR fails to evaluate conformance with the ten Urban Design Principles and nine Walkability Checklist items. The gated pattern would physically divide an open, accessible, and established community.

It is not possible to evaluate the environmental impacts of the project because insufficient information has been provided. In many cases, no information has been provided.

**The DEIR is legally insufficient and needs to be redone.** Alternatively, we encourage the developer to host a planning and design charrette in the community. The objective of the charrette is for all stakeholders to come together and develop a preferred layout that accommodates the developer’s desire for more intense development than what is allowed in the current zoning but also meets the community’s desire to create an inclusive neighborhood that complies with Community Plans, General Plan, Regional Plans and City’s Urban Design and Walkability criteria.
REGIONAL PLANS

Regional Transportation Plan

The Regional Transportation Plan (RTP) provides a long-range vision for regional transportation investments and considers the role of transportation including economic factors, environmental issues and quality-of-life goals.

The DEIR references the 2008 “2012-2035 Regional Transportation Plan (RTP) / Sustainable Community Strategy (SCS)”. This is the old version of the Plan. The DEIR should have used the current 2012 RTP/SCS, rather than the 2008 version, especially since the current version is much more thorough in how to address reducing greenhouse gasses.

The Sustainable Community Strategy [SCS] portion is a new element of the RTP that demonstrates the integration of land use, transportation strategies and investments to meet the region’s greenhouse gas reduction targets. The key land-use policies include focusing growth in centers and along major transportation corridors around existing and planned transit stops, and creating significant areas of mixed-use development and walkable communities.

The DEIR does not comply with the requirement to address the Regional Plan because it does not address how the proposed subdivision brings together land use and transportation strategy to reduce trips and resulting greenhouse gasses. It does not even attempt to reduce auto-related greenhouse gasses. Furthermore, the project does not create opportunities for residents to walk to local destinations nor does it promote bicycling. Why isn’t bike parking a compliance measure? What if anything will the project do to enhance bicycling on Western Avenue?

The DEIR fails to address the 2004 Compass Blueprint Growth Vision Report. The Compass Blueprint Growth Vision is a regional consensus to the land use and transportation challenges facing Southern California now and in the coming years. The DEIR is required to address the Blueprint.

The Growth Vision is driven by four principles:

1. **Mobility** - Getting where we want to go
2. **Livability** - Creating positive communities
3. **Prosperity** - Long-term health for the region
4. **Sustainability** - Promoting efficient use of natural resources
**Mobility:** The Mobility principle encourages mutually supportive transportation investments and land use decisions. A key strategy is to design complete streets that promote walking, biking, and transit use. There is no discussion at all how the proposed subdivision supports this principle.

**Livability:** The livability element promotes mixed-use development in “people-scaled” environment. The proposed project includes only residential uses only, and then limits access. The document makes a few conclusory statements on the subject, but they are mere assertions with no facts and no discussion.

**Prosperity:** The project includes single-family residences, townhomes, and flats. A range of other uses and building types would better promote long-term health of the region. The gated nature of the subdivision signals a disinterest in civic engagement. Mixed use and encouraging civic engagement are very important to future vitality of a community. Also the single-family element is illusory; they are not true single-family homes. They are located on small lots without the yard space that is typical of a San Pedro single-family home.

**Sustainability:** Efficient buildings within compact, diverse, and connected communities encourage walking, biking and transit use, thus reducing energy consumption, trips and air pollution. The DEIR lacks adequate consideration of this requirement. For example, although 75% of energy needs can be addressed with building layout, placement and design, no specific provisions are made to integrate a multi-modal split or to certify the project under LEED-ND.

The proposed gated subdivision utterly fails to meet all four principles of the Compass Plan. The Compass Plan website features many proposed and built development as best practices. None are gated subdivisions.

**Los Angeles General Plan**

The Los Angeles General Plan and its Land Use Framework provide the basis for land use recommendations in the Community Plans.

The site is located at the southern edge of Wilmington-Harbor City Community Plan Area and just north of the San Pedro Community. Both community plans are more recent than the General Plan. Therefore, the community plan’s recommendations are more reflective of the current vision for the site. The Wilmington-Harbor City Community Plan was last updated in 1999. In August 2012, the Planning Department, working with the San Pedro Neighborhood

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7 www.compassblueprint.org
Councils, released a draft update to the San Pedro Community Plan (SPCP). The SPCP Plan has the most current vision of the City and the San Pedro Community.

The proposed project does not meet Objective 4.3 of the General Plan Framework, to conserve scale and character of residential neighborhoods. According to the Planning Department’s prior report,

The Ponte Vista site is...not identified for higher-density residential land uses...is not located within a Neighborhood District, a Community Center, a Regional Center, a Downtown Center or a Mixed-Use Boulevard...the General Plan Framework does identify downtown San Pedro...and the area around the intersection of Avalon Boulevard and Anaheim Street in Wilmington...as the Regional Center and Community Centers for the Harbor area. In addition, these areas are also identified for Mixed-Use Boulevards. Denser residential development should be focused at these locations and not at a location such as the Ponte Vista site that has limited access to services, facilities, and public transit. It also has not been identified for targeted growth in the Framework Plan...8

As discussed extensively elsewhere in these comments, it also does not meet Objective 3.2 “to provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.

San Pedro Community Plan (SPCP)

The SPCP states that while Ponte Vista “is located just outside and north of the San Pedro Community Plan Area, this approximately 60-acre site presents an opportunity for an integrated mixed use and mixed density neighborhood. Its size and proximity to San Pedro calls for a development that is physically connected to the San Pedro community and provides public facilities and amenities that serve neighboring residents.

Land Use Policy 4.5 states, “new development at Ponte Vista should include a mix of uses and densities, a range of housing types, neighborhood services and amenities, compatible with and integrated into the adjacent San Pedro community. Development of the Ponte Vista site should be:

• Designed to provide a mix of housing types for a range of incomes;
• Compatible with a Low Medium density designation;
• Open and accessible to the community, and not developed as a gated community; and

Developed with accessible public open space, community facilities and other public amenities."

The NWSPNC commented during the drafting process for the Community Plan Update and at the public hearing that it is inappropriate for the Planning Department to designate the area as Low Medium density in the SPCP Update as to do so would be a commitment to the designation before the environmental work had been completed and approved by the City. Since the final version of the plan has not been released, we do not know if this bullet has been removed. Nonetheless, the proposed project is in conflict with the three other policies.

Housing Types

A housing typology is a sequenced range of building types, whose design has evolved based on time-tested practices. These typically follow social and cultural norms, financial schemes, market preferences, prevailing climate and technological efficiencies. A variety of housing types can accommodate a range of incomes and family types.

The proposed project provides a very narrow range of building types. There are a number of other types and styles that should be considered such as duplex, triplex, quads, bungalow court, live-work, courtyard housing, hybrid court, and commercial flex buildings. See the also discussion of the inadequate analysis of option B and Attachment C that shows some San Pedro Building types.

Great neighborhoods possess both a distinctive public realm and a rich and complex fabric of buildings designed and built on private land. Public places depend on the incremental design of individual buildings around them. The more harmonious the choice of such buildings, the more distinguished the ultimate form of the place. Conversely, the more random the choice of buildings, the more residual the urbanism.

Open and Accessible to the Community:

The proposed gated community is not consistent with the most current vision of the City and the adjacent San Pedro Community for the site. The problem with gated communities is not the gates but the vicious cycle of attracting like-minded residents who seek shelter from outsiders and whose physical seclusion then worsens paranoia against outsiders and threatens the unity of the community. A homogenous environment diminishes awareness of all that is different and lessens concern for the two communities beyond the subdivision walls.
Open Space and Public Amenities:

Among the key residential neighborhood issues and opportunity areas of the SPCP is “preserving small neighborhood-serving amenities within residential areas [which] serves the larger goal of reducing vehicle trips by making walking or bicycling more viable options for simple conveniences. The proposed plan fails to include any neighborhood-serving amenities.9

As a valuable community resource, open space on this 61.5-acre site can provide visual delight and recreational opportunities while providing ecological and economic benefits. A range of open spaces close by encourages people to spend more time outside engaging in physical activity, such as walking, that reduces the risk of obesity, diabetes, heart and mental illness, while increasing social connection and a sense of community.

All of the alternatives lack a public park. Some residual parcels are called out as open space for the residents of the subdivision. This is a monumental missed opportunity for the Wilmington-Harbor and Northwest San Pedro Communities, but an even greater loss for the future residents of this subdivision.

Open spaces must be carefully integrated with block, street, building and frontage standards to work in consort to create a unique place. Open spaces should include a diverse range of integrated public spaces at the block, neighborhood, and community level. The individual building types should also specify private open spaces at the lot and building level. This approach will allow residents access to a range of public and private open spaces.

Additional Plan Considerations

The NWSPNC requested that the following four bullets be added to the discussion of the development of the Ponte Vista site in the SPCP:

- Promote home-based offices
- Encourage senior friendly facilities.
- Encourage on site businesses such as a coffee shop or convenience store.
- Through the mitigation process, this development or any single development should not be allowed to use up all of the development potential for the surrounding community.

The proposed project does not address any of these.

While not specific to the Ponte Vista site, the SPCP states the “The need for affordable senior housing and assisted living facilities is a key concern due to demographic and economic trends and projections. In San Pedro, such facilities

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9 Draft San Pedro Community Plan, August 2012, page 37
would increase the opportunities for those ‘empty nest seniors’ looking to downsize from large single-family homes while remaining within the community and the reach of supportive social, cultural and family networks.” The lack of any senior housing in this project would be a significant missed opportunity.

**Wilmington-Harbor City Community Plan (WHCCP)**

The proposed project does not meet the fundamental premises of the WHCCP. The first premise is limiting residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Although the six acres immediately adjacent to the South is multi-family, this is an anomaly. This property was zoned commercial with the expectation that it would be used in such a manner. Unfortunately, the same code allowed the multi-family structures to be erected in a manner that is not compatible with the surrounding community. The surrounding neighborhoods are single family R-1, with the exception of the Gardens that is 13.5 net dwelling units per acre. In fact, according to a recent study, 80% of the land along the Western Avenue corridor (Summerland to Palos Verdes Drive North) is dedicated to single-family residential lots.

Furthermore, the WHCCP (1-54) designates specific areas for Low median density and this is not one of them. Instead the plan (IV – 3.8) policy is to “encourage reuse of the existing US Navy housing areas ... in a manner that will provide needed housing ...without adversely impacting the surrounding area.” Clearly the plan did not consider this property suitable for multi-family housing.

The second and third premises are

...the monitoring of population growth and infrastructure improvements through the City’s Annual Report on Growth and Infrastructure with a report of the City Planning Commission every five years...following Plan adoption.... If this monitoring finds that population in the Plan area is occurring faster than projected, and that infrastructure resource capacities are threatened, particularly critical resources such as water and sewerage; and that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect...until the land use designations...and corresponding zoning are revised to limit development.

The Annual Report on Growth and Infrastructure has not been done. The DEIR (I-103) states that the “Projects direct plus induced growth” represents about 91% of the growth forecasted within the WHCCP area, thus this single project will use virtually all of the planned for growth. Considering that there have been other

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11 Western Avenue Corridor Vision, Preliminary Analysis and Ideas, November 14, 2012
residential developments in the 14 years since the WHCCP was developed, building controls should be put into place until such a study is conducted.

The proposal is not consistent with Objective 1-2 “To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities” and Policy 1-2.1 “Locate higher residential densities near commercial centers and major bus routes where public-service facilities, utilities, and topography will accommodate this development.” As was pointed out in a prior Planning Department’s Report:

The Ponte Vista site is not located within reasonable walking distance to a transit station, a transit corridor, or a high-activity center. The closest commercial services are located along the east side of Western Avenue, just south of the Project site (approximately 500-feet south). However, walking or transit is generally not a viable option to access these services since they are laid out in a linear fashion within strip malls or plaza shopping centers, with large parking lots in between the sidewalk and the buildings.\(^\text{12}\)

It is also not consistent with the new vision for Western Avenue that calls for wider sidewalks, transit, and human scaled environment that would encourage walking. As the largest new development along Western Avenue, Ponte Vista has an opportunity to set the tone for others to follow as they redevelop their properties.

The proposal is not consistent with Land Use Policy 1-1.5 to “Maintain at least 67% of residential land uses for single family.” The DEIR (IV.M-24) Cumulative residential projects in the City shows 2,195 new residential units of which only 84 (3.8%) are shown as single-family. Approval of this project would exacerbate that imbalance.

Furthermore, the proposal is not consistent with Policy 1.5.2 to promote housing in mixed-use projects in transit corridors and pedestrian oriented areas. The WHCCP only identifies one such area, Anaheim and Avalon. As discussed in our comments under transportation, Western Avenue in this area is neither a transit corridor nor a pedestrian oriented area. In fact the project is isolated and will require the use of a car for virtually any need. See also the discussion of the lack of public transportation under Traffic and Transportation.

The proposed project does not meet Objective 8-2 and policy 8-2.1 of the WHCCP which seeks “to increase the community’s and the Police Department’s ability to minimize crime and provide security for all residents, buildings, sites, and open spaces” and to “support and encourage community-based crime prevention efforts (such as Neighborhood Watch), through regular interaction and coordination with existing community-based policing, foot and bicycle patrols,

\(^\text{12}\) Department of City Planning Recommendation Report CPC 200608043-GPA-ZA-SP-DA, Ponte Vista Specific Plan, page F-3.
watch programs, and regular communication with neighborhood and civic organizations."

The proposed gated environment would likely breed fear, erode social stability and shrink the notion of civic engagement by encouraging residents to retreat from civic responsibility. It creates an unsafe environment both inside and outside the gates.\textsuperscript{13} The appropriate response to reduce crime, poverty and other social problems, as recommended by the WHCCP, is for the neighborhoods to work together. The best way to bring security to the streets is to make them delightful places that people want to walk in. The streets become, in effect, self-policing. Fences and gates exacerbate the problem.

Chapter IV of the WHCCP identifies recommended actions. For residential housing, number 11 is to “encourage the development of housing types intended to meet the special needs of senior citizens and the physically challenged.” \textbf{Failure to do so in the proposed project is a real missed opportunity.}

\textbf{LA MUNICIPAL ZONING CODE}

The current R-1 zoning is a combination of R-1 and open space. According to the DEIR, this zoning would permit about 385 units. Alternate C for 830 units would more than double that development intensity, and Alternate D would triple the intensity. This increased intensity would increase demands on existing community facilities such as schools, libraries, parks and recreational amenities. In an uncharitable and perverse logic, future residents of this subdivision would be able to use all San Pedro facilities but San Pedro residents would not be allowed access to parks and recreational amenities located inside the gated community.

It is not clear what the trigger is for increased intensity at this location. The zoning conditions, cost of site acquisition, and removal of existing structures are pre-existing conditions. These are not appropriate factors or justifications for increased development intensity. This is especially true for the cost of site acquisition; the fact that the applicant bank loaned the original buyer far more than the property is worth, is not an appropriate justification for failure to consider Alternative B. According to the DEIR Alternate B houses would have to sell for more than $1,000,000.

No support whatever is provided for this claim. However, using the January 2010 “Residential Building Costs” published by the State of California Board of Equalization\textsuperscript{14} the cost of building good quality single family houses is far less than claimed by the applicant. The 216-page publication provides building cost data for a variety of residential building types, sizes and quality. The costs include

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{14} \url{http://www.boe.ca.gov/proptaxes/pdf/ah531.pdf}
\end{itemize}
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entrepreneurial profit and adjustments for location where the units are to be constructed. They do not include discounts for multiple units being constructed at the same time however, which would make the cost even lower.

By way of example, the cost of constructing 385 good quality single-family houses on 61.5 acres with a land cost of $120 million would be **$584,728.31 each, far lower than the unsupported claim of the applicant.**¹⁵

We chose a quality level D8 home of 2000 square feet.¹⁶ There are 10 levels of construction quality, with 10 being highest. The publication includes descriptions of each quality level and photos of each type. From observation, San Pedro would mostly consist of level D6 quality. We used level D8, a much higher quality level. A description of the characteristics of D8 quality, photos of examples of houses of that quality, and the cost of construction are attached as Attachment D. Had we used D6 quality level, the cost per house would be $474,751.31.

Further, the analysis of Alternative B claims there will be no open space even though 15 acres are zoned open space. It also claims that Mary Star will lose road access through the property. These assertions are true only if the City allows that to happen.

**URBAN DESIGN PRINCIPLES**

In 2009, the City Planning Commission approved Urban Design Principles to provide guidance on how street, block and open space design can create desirable and resilient neighborhoods that instill a sense of community.

The ten Urban Design Principles are:

1. Develop inviting and accessible transit areas;
2. Reinforce walkability, bikeability, and wellbeing;
3. Nurture neighborhood character;
4. Bridge the past and future;
5. Produce great green streets;
6. Generate public open space;
7. Stimulate sustainability and innovation;
8. Improve equity and opportunity for all;
9. Emphasize early implementation, simple processes and maintainable long-term solutions; and

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¹⁵ 385 houses at 2000 sf each, = 770,000 s.f. Cost from table $124.11 times 1.10 LA County adjustment = $136.52 psf. Total construction cost 770,000 X $136.52 = $105,120,140. Add: Land cost $120,000,000 = $225, 120,140 total cost land and construction, or $584,728.31 per house.

¹⁶ The unattached houses in the Taper area, Mount Shasta area, and around Dodson Middle School are 1350 sf to 2200 s.f. with an average of 1800 sf. We use 2000 sf.
10. Ensure connections.

The DEIR fails to address or evaluate whether the proposed project complies with these ten Urban Design Principles. They were adopted by the Planning Commission and should be addressed in the DEIR.

WALKABILITY CHECKLIST

Streets make up the lion’s share of the public realm. It appears that streets in this subdivision are largely shaped by engineering standards intended to regulate the flow of traffic and infrastructure.

Streets are important civic spaces where the social and communal life of a neighborhood takes place. The street design inspires the context. Mobility is a means, not an end. Streets must be inviting, safe and secure place for walking, biking and transit for people of all ages, income and physical limitations. Less driving, reduces energy consumption and greenhouse emissions. Walking and biking improves overall health of the community.

The proposed site plan shows front-loaded garages with driveways. A front of a home should face another front and conversely the back should face another back. In many instances, the front frontages face the side or back of another home. These basic principles are important because they establish the context for the street and have a direct impact on walkability.

The City’s Walkability Checklist is a guide for consistency with the policies contained in the General Plan Framework with respect to urban form and neighborhood design. The purpose of the Walkability Checklist for Entitlement Review is to guide Planning staff, developers, architects, engineers, and all community members in creating enhanced pedestrian movement, access, comfort, and safety. The Checklist provides guidance on nine topics: public sidewalks, crosswalks, on-street parking, building orientation, on-site parking, landscaping, building facade, lighting and signage.

The DEIR fails to make a finding of conformance with the policies and objectives of the General Plan related to the project’s walkability. Walkability conformance is potentially significant due to the exclusive and gated pattern of the proposed development.
L. POPULATION AND HOUSING

PLAN FRAMEWORK ELEMENT

Objectives

The DEIR indicates that one of the relevant objectives is:

4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers.

The proposed project does not meet this objective. The location of the project is isolated with extremely limited public transit options as discussed in the transportation comments. Residents of the proposed development would either have very long walks (highly unlikely) or drive to everything.

Housing

The DEIR (IV.I-22) states that “The jobs-housing ratio in the City of Los Angeles Subregion – i.e., the numerical ratio of 1.34 jobs to households – was very close to the ratio for the SCAG region as a whole in 2010 (1.37)…and is therefore considered close to “balanced.” By adding 490 indirect/induced jobs …the Project would have no impact on the Subregion’s 2010 jobs-housing balance…. By 2017 however, the Subregion is forecasted to add households at a faster rate than jobs…such that the Subregion would be considered “housing right/jobs poor”…. By adding 490 indirect/induced jobs…the Project would have a neutral numerical impact....”

The premise of this description is flawed leading to a false conclusion. The description fails to note that the local job/housing balance that is significantly different than that of the Subregion. According to the draft San Pedro Community Plan, San Pedro has a jobs/housing balance of 0.44. The addition of 1135 households would therefore further reduce the jobs/housing balance in the area. This is a significant negative impact and indicates that the project would be primarily a commuter community. Mitigation measures should include the creation of jobs on site.

We question the SCAG growth estimates and hence the need for additional housing since the 2010 census actual population numbers are well below SCAG 2005 estimates and projections. The DEIR (IV.L-9) discusses the SCAG Regional Housing Needs Assessment that was developed for the period January 1, 2006 – June 30, 2014. This is an old document. The new version of this document should be used. Furthermore, this old version has been shown to have grossly overestimated the projected growth for Los Angeles in general and San Pedro in
particular. For example, the SCAG 20005 population estimate for San Pedro was 82,112; however, according to the 2010 census there are only 76,651 persons in San Pedro, 5,461 fewer. If the 2.5% growth forecast from 2010 through 2017 were applied, this would add 1916 to the population of San Pedro by 2017 still significantly below the 2005 SCAG forecast upon which the housing needs were developed. Consequently it is in error to conclude that the project will not induce substantial population growth in an area by proposing new homes.

The justification for multi-family housing types is erroneous. The surrounding area is not all multi-story, multi-family housing. About 60% of San Pedro is multi-family; there is a glut of such housing on the market in San Pedro, some of it immediately south of the project. [While some of the condo projects built in the last five years are occupied, they are rental units because the developers cannot sell them]. Single-family housing is the housing type in greatest demand.

Moreover, by building what it proposes, the applicant will undercut and greatly impact the Community Plan for San Pedro that emphasizes the rebuilding and renaissance of downtown San Pedro. The creation of a livable, walkable downtown area has been challenged by a lack of demand for the condos that have been built there.

M. PUBLIC SERVICES

The City has the obligation and responsibility to provide the necessary services to enhance our quality of life. The City is already being challenged to do so. Ask any tax paying citizen who has had to wait for requested police or fire response or who is witnessing the decay of their neighborhood for lack of tree trimming, street sweeping, street and sidewalk repair, failing schools and the list goes on.

The Ponte Vista DEIR, with its 4,009 direct and indirect residents, seems to base its claim that the impact of the preferred plan would be ‘less than significant’ and ‘less than significant with mitigation’ on the fact that no new fire or police facilities would be required. The claim is an attempt to make a case for building as large of a project as possible without considering the real consequences it will have on the existing community; it is not just about buildings, it is about impact on the community including the availability of personnel to respond to called for services and to participate in proactive crime and fire prevention measures.

This project is being developed in an existing area that currently requires a comparatively limited number of calls for services, therefore, any increase should be considered significant. The project area is currently zoned for R-1 and open space, which would be the ideal ‘fit’ for the existing neighborhood community and have a minimum negative impact. This describes Alternate B, which has less of an environmental impact than Alternate C, the preferred Alternate.
Admittedly determining the anticipated impact of this project on the existing community is purely a speculative process generated by infinite unknowns. Calls for service may result from intentional and accidental human acts and acts of nature, some minor and others more serious or even catastrophic in nature, but all significant to those impacted.

What is clear, however, is that the more people, the more buildings, the more streets, the more cars, etc., the more significant the demand for police, fire, and EMT/ambulance services and the higher the probability of an unacceptable level of service in the Harbor Area. In fact, in a recent editorial the Daily Breeze (December 31, 2012) states “Unacceptably long response times are dogging the Los Angeles Fire Department and must be addressed immediately. It’s a matter of life and death, as illustrated earlier this month by the case of a 16-year-old boy who collapsed while playing soccer at Wilmington Middle School.” The mitigation proposed in the DEIR relative to first responders is limited to on-site measures. In reality that’s all the developer can do because they do not have the power to hire more first responders or purchase needed vehicles.

Parking in streets and parking structures vs. private garages, apartment living vs. single family residences, real park space vs. limited green space, more cars on already overburdened streets are but a few examples of conditions with the potential of having a significant impact on calls for services. The current plan is more conducive to creating a contentious rather than harmonious neighbor.

Another significant fact to consider is that the project is located at the tip of a peninsula and not adjacent to other L.A. City first responders. Needed assistance, in extreme emergencies, may or may not be available from neighboring cities or the County. Help from L.A. City Fire and Police stations are unspecific miles away depending on the availability of their first responders at the closest facility. The Harbor Area is exposed to a much higher level of hazardous sources that could result in devastating consequences and liability issues than any other part of the City. The most volatile and closest to the Ponte Vista site is Rancho LPG. The City can ill afford minimizing and ignoring the vulnerability of Ponte Vista and its 4,009 residents. According to the EPA Guidance to enforce 40 CFR Part 68, if 57,000,000 pounds of butane (roughly one of the refrigerated Rancho tanks) were released, the blast radius would be 3 miles.

1. FIRE PROTECTION

The analysis of fire protection and proposed mitigations is inadequate. The DEIR states that all public street fire lane cul-de-sacs shall have the curbs painted red or be posted “No Parking Any Time” prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
The streets in the project are proposed to be *private* streets, so where will the “public” street fire lanes be? This contradiction should be fixed. Where will the guests park? Please state how the no-parking zones and red curbs will be enforced. What if cars are illegally parked in red zones and in private lanes making it impossible for emergency vehicles to get through?

The DEIR section on Fire Protection says that the Project is not within the maximum response distance between residential land uses and a LAFD fire station. The DEIR says that this will be mitigated by sprinkler systems installed throughout all structures to be built as part of the Project. This is taken from LAMC, but requires clarification.

The proposed mitigation states sprinklers will be installed throughout all structures but does not specify if fire sprinklers will be installed inside every residential unit. “The US Fire Administration supports the recently adopted changes to the International Residential code that require residential fire sprinklers in all new residential construction. It is the position of the U.S. Fire Administration that all Americans should be protected from death, injury, and property loss resulting from fire in their residence. All homes should be equipped with both smoke alarms and residential fire sprinklers.” Please clarify the DEIR and address implications if sprinklers are not installed in every residential unit.

The DEIR fails to address the anticipated response times for paramedic/EMS services provided by LAFD. Additionally, Western Avenue is the main access road for ambulances to the Little Company of Mary Hospital in San Pedro and an important access road to Kaiser Permanente Hospital in Harbor City. The DEIR should include mitigations for the longer response time in EMS/paramedic services. In emergency medical situations every second counts! Proposed mitigation might include, but should not be limited to, defibrillators on site. Please address this issue.

The DEIR correctly states that “The LAFD’s ability to provide adequate fire protection and emergency response services...is also determined by the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, *which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route.*” The DEIR indicates that two of these intersections are currently operating at LOS E or F, and goes on to state that “None of the intersections that provide direct emergency access to the Project Site [Western & Green Hills, Western & John Montgomery] currently operate at LOS E or F during peak community hours.” While it may be true that neither of the intersections that provide direct access currently operated at those levels on the day they were studied, the conclusion is misleading. The proposed primary entrance to the facility is at Green Hills Drive and John Montgomery Drive. When San Pedro has one of its legendary (and

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17 Source: US Fire Administration, June 2009
frequent) lengthy funeral processions (a local custom, or during Christmas shopping season, or when there is an emergency situation or road repair (not an infrequent occurrence), Western Avenue backs up for blocks. It is not unusual to see emergency vehicles trying to go against the traffic on this divided highway. In addition, what good is it if that intersection is open but Western and Palos Verdes Drive North or Western and Capitol, are blocked. The additional traffic from the proposed development will only compound this situation.

The DEIR should also address how additional residents of the Project would affect availability of EMS services.

Mitigation measure IV.M-9, Project Design Features, discusses the development of an emergency response plan and indicates that during the development of the plan the Project Applicant should consult with neighboring land uses. None of mentioned users includes the residents. Please add the Northwest San Pedro Neighborhood Council, the Harbor City Neighborhood Council, and the City of Rancho Palos Verdes to the list. Please also add a requirement that the emergency response plan should ensure that there would be no adverse impact on the evacuation of surrounding neighborhoods as a result of any evacuation of the project area. There is no guarantee of additional police or firefighters to meet the additional demands.

Additionally, the development of the Emergency Response Plan should be included Table I-I as either a Compliance Measure or a Required Mitigation Measure.

2. POLICE PROTECTION

For purposes of analysis of impact on police services and possible need for additional police officers, it is assumed that the Project would result in a net addition of 4,009 persons to the Harbor Area. Population increase in an area typically increases demand for police services. The applicant however, says that security and design features in the project should help to decrease need for police services. This may or not be true. We suggest that the Project be required to include Anti-Graffiti measures and comply with street lighting guidelines as if the streets were public streets.

Additionally, the DEIR should examine the impact on police services in the event that the gated nature of the project is not approved.

3. SCHOOLS

There are several problems with the methodology used for the school impact analysis.
The student generation rates used are not consistent with those used by the City in the DEIR for the San Pedro Community Plan Update. That document says the LAUSD student generation rates for multi-family residential units are 0.2042 elementary (K-5), 0.0988 middle school, and 0.0995 high school. According to the Community Plan DEIR the “rates vary slightly with single-family, units, but provide an accurate approximation.”\textsuperscript{18} The DEIR projects two different student generation rates for Taper, a rate of .1705 per du for single family, and .1141 for the condos and townhomes. The LAUSD generation rates cited in the DEIR for the San Pedro Community Plan update should be used. Additionally, the students generated by the approved, but not yet built Harbor Highlands development must be included in the analysis for Taper and Dodson.

The school enrollments and capacity should both use the total school capacity and total enrollment. The DEIR incorrectly indicates the school enrollments for 2011-12. According to LAUSD’s website, the 2011-12 enrollment was 626 at Taper, 1819 at Dodson, and 3335 at Narbonne. According to LAUSD, the current enrollments (12/12) are 629, 1863, and 3350 respectively. (See Attachment E). According to LAUSD, these enrollment figures include both the regular school students and the magnet school students. Likewise the capacity figures used must include both the regular and magnet school capacity. The chart below uses the current student population and capacity data obtained from LAUSD on January 4, 2013.\textsuperscript{19}

<table>
<thead>
<tr>
<th></th>
<th>Current Students</th>
<th>Ponte Vista\textsuperscript{20}</th>
<th>Harbor Highlands</th>
<th>Total</th>
<th>Capacity</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taper</td>
<td>629</td>
<td>231</td>
<td>27</td>
<td>887</td>
<td>804</td>
<td>83</td>
</tr>
<tr>
<td>Dodson</td>
<td>1863</td>
<td>112</td>
<td>13</td>
<td>1988</td>
<td>1892</td>
<td>96</td>
</tr>
<tr>
<td>Narbonne</td>
<td>3350</td>
<td>113</td>
<td>0\textsuperscript{21}</td>
<td>3463</td>
<td>3531</td>
<td>(68)</td>
</tr>
</tbody>
</table>

As can be seen, if the correct, current figures are used, both Taper and Dodson would be over capacity. This is a significant impact and must be addressed.

Certainly the cumulative impact of school-related traffic is a major and possibly unmitigated consequence of any new development on the property. The reality is that children at all grade levels, particularly the elementary level, DO NOT, for the most part, walk to school anymore. They are almost exclusively driven, resulting in

\textsuperscript{18} San Pedro Community Plan DEIR p 4.12-31  
\textsuperscript{19} The Current Students and School Capacity figures were obtained from Bruce Takeguma, Director, LAUSD, School Management Services (213) 241-3344  
\textsuperscript{20} For Ponte Vista and Harbor Highlands the student generation rate from the San Pedro Community Plan was used.  
\textsuperscript{21} Although Harbor Highlands will generate 13 students, they would go to San Pedro High School, not Narbonne and therefore are not counted here.
serious traffic tie-ups at both ends of the school day, as well as many unique trips in and out of any development. This is particularly true in San Pedro where a variety of relatives are available to pick up and deliver children to and from school. Mitigations should be proposed to encourage children to walk to Taper and Dodson.

Developer fees from SB 50 would be approximately $900,000. We understand that State law concludes that the contribution meets all CEQA requirements. However, the adequacy of the contribution to provide increased need for facilities does not address the impacts on traffic and the need to protect children on the way to and from school. It would seem useful to use at least a portion of those monies to improve traffic flow and control around impacted schools, particularly Taper Ave. Elementary.

Additionally, the discussion of the Port of Los Angeles High School should be revised to indicate that the school currently has a waiting list and that admission is by lottery.

The list of high school magnet programs should be revised to include the Teacher Prep Academy located on the campus of Harbor College and Trinity Lutheran should be added to the list of Private Schools.

4. PARKS and RECREATION

The City’s Public Recreation Plan calls for 10 acres of land per 1,000 persons and provides that “A minimum of 10 percent of the total land area should be in public recreation or open space. It also says that Neighborhood Parks should be provided at a minimum of two acres per 1,000 residents and be five to 10 acres in size with a service radius of approximately one-half mile.” Based on this standard, a project with an estimated population of 2,923 should contain at least a 6-acre Neighborhood Park. The Recreation Plan indicates Neighborhood Recreation Sites typically include facilities for active sports such as softball, basketball, soccer, and volleyball.22

Currently 15 acres of the property is zoned open land (parks and recreation). It seems logical that park space (active and/or passive) should be a top priority. The DEIR is based on a project description that includes a 2.8-acre public park that even if it were built would be inadequate. Subsequent to the initial description, the applicant deleted all public park space from the proposed project.

The applicant claims impacts related to parks and recreational facilities would be less than significant, as the two swimming pools on the property and what can only be described as mini-parks or “parklettes” scattered around the property will fulfill the project’s residents’ needs for recreation space. While these amenities are

22 See Los Angeles public Recreation Plan page 2 for a complete list.
commendable, they do not constitute a Neighborhood park and do not satisfy the requirements of the City’s Public Recreation Plan. The theory in the DEIR seems to be that residents will not use external truly public facilities, with the result there will be so little additional usage of public parks that impact will be insignificant. Where will the youth play basketball, football, tennis, and soccer?

The lack of adequate park space is a significant impact. It is insufficient to say that the project will pay the required Quimby fees. Quimby fees do not provide land for parks and there is no land available for purchase within the half-mile service radius.

This development team, as did the team before, predicates its plan on a truly mystifying lack of interaction between the development and the world surrounding it. No traffic, no impact on schools, no pressure on recreational facilities—no need for any improvement to infrastructure beyond the bare minimum that might be expected of a strip mall or a 6-8 home development, on a square footage basis.

The assertion that “there is no existing park area at the Project site” is at best misleading and should be deleted. Currently 15 acres of the site are zoned for open space.

5. LIBRARIES

The DEIR is not accurate in its assertion that the current San Pedro library, at 20,000 square feet, is adequate size for the population served, and should be adequate to meet the needs of the increased population added by the development. This claim is in conflict with the DEIR for the San Pedro Community Plan that states “The available public library services in the San Pedro CPA, in terms of library space and permanent volume collection, are currently inadequate to meet existing demands from the community’s residents based on state library standards…. of 0.5 square feet per person.” The State of California Library standard requires 0.5 sq ft of library space per resident. For the existing population of 76,651 residents (2010 census data), library space available should 38,325 square feet, nearly double the existing space. Since the project would add nearly 3,000 additional residents, and it would require at least 1500 square feet of additional space.

The DEIR further asserts that the LAPL is “currently planning to build a new West San Pedro neighborhood library in the future.” While it is true that LAPL has identified a need for a library in West San Pedro, it is misleading to say that they are “currently planning.” The Community Plan for San Pedro recommends a new 14,500 square foot “West San Pedro” branch library, however, this would only bring library space in San Pedro to 34,500 square feet, still not meeting State of California library standards for the population of San Pedro. The San Pedro

23 San Pedro Community Plan DEIR p 4.12-40
Community Plan acknowledges that no location for a “West San Pedro” library has been proposed or selected, there is no plan for selecting a site, and there is no current nor anticipated funding for building said library. The fact that one is proposed is further indication of the need for additional library services, a need that will be aggravated by the proposed project. **It will have a significant impact on library services and this impact must be mitigated.**

The Ponte Vista project has an opportunity to mitigate this defect by incorporating a public library into the project. The library should be at least 20,000 square feet to meet State requirements. The San Pedro Community Plan recommends integrating libraries into multi-use buildings. For reference consider the Milwaukee Public Library is moving ahead with development of two multi-use buildings including libraries: one is a proposed 16,000 square foot library topped with 92 apartments (plus parking).  

The San Pedro Community Plan also suggests that on-line services and virtual libraries with computer workstations that provide access to the library’s on-line catalog, extensive information databases, multimedia software for students, and free Internet searching for the public may lessen the adverse impacts resulting from a mismatch between available physical library space and resources and the community’s need for library facilities.”

**N. TRAFFIC**

The entire focus of the traffic impact analysis is on measuring the number of cars moving at the intersections. While the movement of autos is important it is not sufficient. As the City has shifted its focus to mobility, so should the analysis in the DEIR. The DEIR fails to address any measured analysis of walking, biking, or transit and ignores other design features that could reduce car-usage such as on-site amenities and provisions for home-offices.

The traffic analysis estimates the impacts on streets and intersections in and around the project. The analysis looks at the ambient growth rate of existing traffic, the traffic contributed by other projects, the traffic contributed by the project itself, and compares this traffic load to existing intersection usage, expressed as the vehicle counts compared to the intersection capacity [V/C ratio]. From this, the analysis determines the “Level of Service” [LOS] in the existing condition and compares it to the LOS if the project is built. For those intersections showing certain increases in the V/C ratio, or a decrease in the LOS, the DEIR proposes mitigation measures designed to lower the impact so that it is not significant.

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25 San Pedro Community Plan DEIR p 4.12-40
We have concerns about how the variables were calculated and the accuracy of the LOS results obtained, about the way in which mitigation is determined, and the failure to address how to design the amenities on the site in order to reduce traffic generation. This should be corrected.

1. IMPROPER CALCULATION OF THE VARIABLES

Improper Use of ITE Traffic Generation Data

The project-generated traffic is underestimated because the applicant used the midpoint data for each housing type while ignoring project characteristics.

The DEIR uses three different ITE housing classifications to predict trip generation. It uses the average trip generation figures for each classification.

ITE figures represent thousands of studies and a wide range of reported trip generation figures. In this case, there is no difference between how often residents of each different type of unit will need to use their vehicle in this project, but the analysis contains no discussion of this. Instead, the DEIR simply uses the mid-point figure. For example, the DEIR indicates that a single-family house will generate 9.57 trips per day while a three-bedroom condominium right next door will generate 5.81 trips per day. This makes no sense when residents of the project will have to drive to every destination, whether to work, school, soccer practice, the gym, church, or the market. The applicant should have selected a trip generation rate in the reported range closer to the single-family rate because the project characteristics are so similar.

Further, each trip generation graph in the ITE Manual includes a wide range of actual trip generation numbers. To select the mid-point is difficult to justify. Had the developer and the City used more appropriate data points within each classification, as they are permitted to do, and admonished to do by ITE itself, the trip-end volume would be 10,862 instead of 7,462. AM peak hour volume would increase from 571 to 851 and PM peak would increase from 669 to 1146. Using these calculations, and using normalized traffic counts, would greatly increase the V/C ratios and lower the LOS ratings at many more intersections among the 56 tested intersections.

The V/C Ratios Used as a Baseline Need to be Normalized

The vehicle counts used in the V/C ratios and the LOS calculations are lower than normal due to the impact of the economy on “real” traffic generation rates.

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26 We suggest that perhaps the traffic problems in other areas of the City and increasingly in San Pedro, Wilmington and Harbor City, can be attributed to this practice of using mid-point calculations rather than more realistic data.
The impact is shown in the DEIR counts in 2010, which are lower than earlier counts taken by the same consultant in 2005 for the prior project, lower than the counts taken for the Target Store analysis in 2006 and lower than many of the counts for the Marymount project on Palos Verdes Drive North in 2011, after the installation of ATSAC/ATCS. For example, the V/C PM ratios for Western and PV Dr. North are

<table>
<thead>
<tr>
<th>Year</th>
<th>Ratio</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>1.025</td>
<td>Ponte Vista I</td>
</tr>
<tr>
<td>2006</td>
<td>1.078</td>
<td>Target</td>
</tr>
<tr>
<td>2010</td>
<td>0.851</td>
<td>DEIR, present project</td>
</tr>
<tr>
<td>2011</td>
<td>0.872</td>
<td>Marymount</td>
</tr>
</tbody>
</table>

This difference is noticeable at many of the intersections common to all four studies.

It is shown in concrete terms, for example, by the reports of the annual TEU\textsuperscript{27} counts in the Port of Los Angeles (an indicator of workload for Port workers) that declined from 8.5 million TEU's in 2006 to 6.7 million TEU's in 2009. It is beginning to recover but has not reached pre-recession levels.

Our concern about the use of the October 2010 data at the height of the economic downturn has been discussed with the applicant's representative on several occasions. Normalized data is used in many, many other areas of planning, such as employment data, business valuations, and indeed, environmental tests. It is not possible to properly determine true, likely impacts if baseline data is atypical. That is a recipe for gridlock.

**Failure to Include Data from Other Projects**

CEQA requires a DEIR to include traffic generated by other known projects in the traffic generation estimates, The applicant left out a number of such projects, many of which impact the studied intersections. We listed them earlier in our comments. We repeat them here:

- Southern California International Gateway (SCIG)
- APL Terminal expansion
- Ports O'Call Redevelopment
- Cabrillo Marina Phase II
- USS Iowa

\textsuperscript{27} Twenty Foot Equivalent Units, a measure used to normalize cargo counts since not all containers are the same size.
Los Angeles County Sanitation Districts Clearwater Outfall Project
- Rolling Hills Prep School build out
- VOA Navy Village
- Pacific LA Marine Terminal
- Harbor Highlands Development (under construction)
- City Dock 1
- Port Master Plan update
- San Pedro Community Plan update
- Marymount College Expansion on PV Drive North

Of particular interest is the Community Plan Update, which forecasts an almost 10% population growth for San Pedro not including Ponte Vista in the next 18 years.

**The Ambient Growth Rate of 1% is not Supported by any Documentation**

Both the DEIR and the Western Avenue Task Force used a 1% growth rate for Western Avenue, but CalTrans engineers opined in those meetings that the growth rate was actually much higher.

Rather than use a number obtained from MTA, as does the DEIR, we suggest that documentation be provided.

**Public Transportation is Not Really Available to the Site**

The DEIR (I-133) states that there are 14 buses per hour serving the project during the morning peak hour. **This is misleading** and should be corrected. There are four bus lines that serve the project site, none well.

**Metro Bus Line 205** runs from 13th and Gaffey Streets to the Imperial Wilmington Station at Imperial Highway and Wilmington Avenue in the Watts/Willowbrook Area. The frequency varies from every 20 minutes during the am peak hour to 1 hour. This bus goes up Western and connects to the Artesia Transit Station where it is possible to transfer to another bus to go to downtown Los Angeles. Unfortunately it takes approximately 40 minutes just to get to the Artesia Transit Station; there is no incentive for future residents to be so inconvenienced.

**Max Line 3** runs from 36th Street and Pacific Ave in San Pedro to LAX Green Line
Station and the Airport Courthouse. It operates northbound to El Segundo in the early AM and southbound to San Pedro in the late afternoon. MAX Line 3 does not operate on major holidays or on weekends. It only makes 4 trips in am, the first at 5:36 and the last at 6:44 am and 4 in pm between the hours of 4:46 and 6:15 pm; basically 2 buses/hour. This is a viable option if your work is in El Segundo.

The remaining two lines are operated by RPV and are primarily designed to transport RPV students to RPV schools.

**PV Transit Orange Line** runs 2 morning buses along Western from Palos Verdes Drive North to First Street then to Palos Verdes Drive East ending at Palos Verdes High School and 3 buses in the afternoon corresponding with school start and stop times. These lines are designed to carry Palos Verdes students to Palos Verdes schools, and as such are really not useful to the residents of Ponte Vista.

**PV Transit Green Line** is also geared primarily to Palos Verdes schools and the Library. It runs along Western Avenue from First Street to Palos Verdes Drive North then west along Palos Verdes Drive Road ending at Ridgecrest Elementary School.

2. COMMENTS CONCERNING PROPOSED TRAFFIC MITIGATIONS

**Some Offered Mitigation is Already Proposed by Marymount**

Marymount College is required to implement some of these same by mitigations as part of the approval of its mitigated negative declaration for its project on Palos Verdes Drive North. It is our understanding that if any of the proposed mitigation measures are provided by another source (e.g. Marymount College), prior to being implemented by this Project, an alternate mitigation measure may be required. We request that in the event that should occur, the applicant be required to consult with the Northwest San Pedro Neighborhood Council, the Harbor City Neighborhood Council, and the City of Rancho Palos Verdes on appropriate mitigation measures.

**Other Mitigations Transfer the Traffic Burden to Wilmington and Harbor City Residents**

Quite a bit of the proposed mitigation is designed to increase the overall capacity at an intersection by addressing other traffic issues and thus could potentially allow longer turn and through signals for the project traffic. In other words, traffic from Harbor City, Palos Verdes and Wilmington will be adjusted, possibly negatively impacted, in order to make more room for Ponte Vista traffic.

**The Projected Routing for PM Peak Hour Traffic Does Not Seem to Have a Basis**
We realize that predicting access routing is sometimes an art rather than a science. However, given the very long PM backups at the 110 Freeway off-ramps at Sepulveda, Pacific Coast Highway and Anaheim, coupled with the challenge of making a left turn across Western, it seems likely that in the evening, a large percentage of commuters will exit at Channel Street and proceed north on Gaffey to Channel, Capitol, or Westmont and then west to Western to the project entrances. This assumption is given further credence in that virtually every place a commuter might want to stop on their way home, be it for groceries, dry cleaning, or to pick up a child, is off of either Gaffey or that portion of Western that lies between Channel and Westmont. Further, this commuter traffic will be joined by those residents who are coming home from downtown San Pedro and the San Pedro Waterfront and from Long Beach and points south via the 47. An analysis of all of this traffic should be included.

**The Proposed Project Makes No Attempt to Mitigate Project Generated Traffic Through Project Design or Project Amenities**

A significant amount of project-generated traffic will be work related traffic. Other components will be taking kids to soccer practice, taking children to school, going to the markets and library, church, etc. Work-related traffic will be especially heavy, and for greater distances then normal, because the project is not really responding to local employment needs. In other words, they are proposing a suburban commuter community.

What is striking about the proposed project, and the DEIR, is that it proposes nothing to mitigate trip generation by providing amenities on-site, such as work centers, library branch, parks, mini-market, better walking access to local schools, etc.

**OTHER CONCERNS**

The DEIR fails to analyze the impact of increased traffic on Western from the 74 driveways and non-signalized intersections on Western between Summerland and Palos Verdes Drive North. According to a recent study of the Western Avenue Corridor, there are 111 destinations on Western between Summerland and Capital Drive. These grocery stores, post office, dentist offices, coffee shops, banks, etc. are accessed through the driveways. These poorly designed driveways add to the traffic flow problems. For example, the turn lane into the shopping center nearest the project can only accommodate about 4 cars. After that, cars begin impeding the flow of traffic on Western. This is a very unique

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28 The DEIR for the San Pedro Community Plan Update established that the jobs per household ratio for San Pedro was 0.44 while the Los Angeles area ratio is 1.35. This means that for the 1135 households in the project, assuming two working adults, 550 will drive to local jobs and 1700 will drive a longer distance.

29 Western Avenue Corridor Vision Preliminary Analysis and Vision, Nov 14, 2012

38
condition and an analysis should be conducted of the impact of the traffic generated by the Ponte Vista residents using these driveways.

Additionally, the assertion that 60% of traffic will be going North and 40% south on Western does not seem credible given that virtually all amenities are located to the South.

We are concerned about the impact on traffic flow along Western from installing additional stoplights at Fitness Drive and Peninsula Verde. Consideration should be given to a “pathway” through Ponte Vista as an alternative to a light at Fitness Drive. Additional stoplights on Western may cause more traffic congestion, not less.

Several of the proposed mitigations are subject to approval by other jurisdictions. The DEIR should address the impact on traffic if these mitigations are not approved and there should be a procedure in place for developing substitute mitigations.

Consideration should be given to creating a “walking school bus” and a bicycle path from the road at the back of the development thru Mary Star to Taper.

The DEIR failed to study the Harbor Freeway Channel Street Off-Ramp and the 47 Freeway Channel Street On-Ramp at Miraflores. The impact of increased traffic at this intersection must be studied and appropriate mitigations proposed. In addition, the full intersection including Channel and Gaffey must be re-examined. We are suspicious that the low LOS shown at that intersection was the result of southbound Gaffey traffic backed up at Miraflores and therefore not even entering the Channel and Gaffey intersection. An April 2004 baseline study, for the Port of Los Angeles found this intersection to be at an OS of E during the PM Peak Hour and the Gaffey/Miraflores intersection to be an LOS of F in the AM Peak hour and D in the PM Peak Hour.  

The DEIR fails to discuss the impact of the additional traffic on the freeway off-ramps at Pacific Coast Highway and Anaheim and the resulting backup on the 110 freeway.

Mary Star should have vehicular access from both Green Hills Drive and Avenida Aprenda and the internal roads should be connected at the back of the property.

The DEIR does not appear to account for the impact on traffic of the additional time required for the approximately 225 additional middle and high school students pushing the “walk” button to cross Western on their way to and from school, assuming that the Dodson students walk to school and the High School students

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30 Port of Los Angeles Baseline Transportation Study, Meyer, Mohaddes Associates. April 2004
take public transportation. This must be added into the traffic study for that intersection.

It is unclear if the DEIR properly accounts for the fact that most students from the Eastview Area of Rancho Palos Verdes immediately west of Western are not attending Crestwood Elementary, Dodson Junior High, or Narbonne High School. The attendance in the Palos Verdes School District by Eastview residents is rumored to be over 90% of the local students for the area. Most students from Dodson and Crestwood are being bused in; likewise Eastview students are commuting by car and bus via Western Avenue to Dapplegray Elementary, Miraleste JHS, and Palos Verdes High School.

The parking plan for both residents and visitors is unclear and needs to be clarified.

The Proposed Project Consumes All of the Available Infrastructure Space in the Community Plan

What is the point of having a Local Community Plan if it will be impossible to provide for projected development? As a matter of policy, we question whether a single project should be entitled to more than a pro rata amount of available infrastructure usage, in this case roadway space, at the expense of other future development as contemplated in the Wilmington Harbor City Community Plan and the San Pedro Community Plan update.

PUBLIC TRANSPORTATION

The DEIR (I-133) states that there are 14 buses per hour serving the project during the morning peak hour. This is misleading and should be corrected. There are 4 bus lines that serve the project site, none well.

Metro Bus Line 205 runs from 13th and Gaffey Streets to the Imperial Wilmington Station at Imperial Highway and Wilmington Avenue in Watts/Willowbrook Area. The frequency varies from every 20 minutes during the am peak hour to 1 hour. This bus goes up Western and connects to the Artesia Transit Station where it is possible to transfer to another bus to go to downtown Los Angeles. Unfortunately it takes approximately 40 minutes just to get to the Artesia Transit Station; there is no incentive for future residents to be so inconvenienced.

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transport RPV students to RPV schools.

**PV Transit Orange Line** – runs 2 buses along Western from PV Drive N. to First then to PV Drive East ending at PV High School in am and 3 in pm timed with school start and stop times. These lines are designed to carry Palos Verdes students to Palos Verdes schools, and as such are really not useful to the residents of Ponte Vista

**PV Transit Green Line** also primarily geared to PV schools and Library. Runs along Western from First to PV Drive North then west along PV Drive Road ending at Ridgecrest Elementary School

O. UTILITIES AND SERVICE SYSTEMS

1. WATER

The DEIR states that the project’s water usage will have a “less than significant impact with mitigation” on the area’s infrastructure and environment (p. VI-142). A brief examination of the document raises serious questions about that conclusion and suggests that it is much too optimistic.

The developer estimates that the 1,135-unit project will use 216 acre-feet per year of water. (p. I-135). That translates to 170 gallons per day per unit. However, that figure is far below what experience has shown constitutes actual use. The United States Environmental Protection Agency has found that the average American household uses 400 gallons per day. In Southern California, where residents may be more sensitive about conserving fresh water, the Los Angeles Department of Water and Power (LADWP) reports that the average single-family residence consumes 359 gallons each day.

In other words, the developer estimates that Ponte Vista will use less than half the water that the LADWP finds real households actually use. What is more, the DEIR offers little explanation — beside mitigation measures such as flush-less urinals in the project’s common areas and low-flow showerheads and “green” appliances in the residences (p. IV O-10) — for this very significant discrepancy. Yet these measures are already widely employed in the community and should therefore be reflected in the 359-gallon figure the LADWP cites.

The DEIR does make reference to “purple pipe” — that is, plumbing that will use reclaimed wastewater for irrigation, once a main line of purple pipe is extended to

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31 “Water Sense,” an EPA Partnership Program at www.epa.gov/WaterSense/WaterUseToday
32 Los Angeles Department of Water and Power, 2010 Urban Water Management Plan [hereinafter referred to as the “UWMP”], p. 43.
this area. Rather than waiting for reclaimed wastewater to be available the developer should be required to plumb the units to provide gray water for irrigation.

Raising further doubts about the reliability of the project’s water use estimates is the DEIR’s estimate that the project will add 205,950 gallons per day to the sewage system. (p. IV O-25). The report offers no explanation why water usage – which includes water used for common area irrigation that would not flow into the sewer lines – would be less than the amounts added to the area’s sewer system.

Overshadowing the DEIR’s estimates regarding water usage is the fact that the LADWP projects it will encounter more difficulty obtaining fresh water supplies in the future. This is so for several reasons including: 1) population pressures throughout the Southwest, 2) increasing drought conditions in the area, 3) climate change and 4) legal restrictions on importing water especially from Northern California and the Colorado River. (UWMP, p. ES-1). Under such circumstances, it should be imperative that water providers use considerable caution in estimating their ability to satisfy the area’s future water needs. Indeed, in an effort to appear to be meeting increased future demand, the LADWP is already employing the very questionable tact of counting “conservation” as a water source. According to its own estimates, by 2035, 9 percent of the water it supplies to Southern California will be from “conservation.” (UWMP, p. 19).

Furthermore, the entire state is facing a water crisis. According to population projections, the state’s total population will increase to 60 million people by the year 2050, an increase of over 56% from the 2000 census numbers. As the state’s population continues to grow, this is putting strain on our existing water supplies, as well as bringing into question the ability to accommodate this expected future growth. At the same time, drought and climate change are reducing the snowpack California depends on to fill its reservoirs, and the Delta, critical hub of California’s water system, faces multiple risk factors to its fragile levees while continuing to experience ecosystem decline and plummeting native fish populations. Continued population growth throughout the Southwest combined with a persistent drought in the Colorado River basin is putting increased pressure on the limited resources of the Colorado River. In addition, Indian reservations, left out of previous water rights agreements, have begun to exercise their long-held but unused water rights, putting further strain on the limited resources of the Colorado River.

Ensuring a water supply to meet the needs of California’s existing residents while providing for future population growth has become a major statewide issue as

news stories and research reports highlight the challenges that lie ahead and legislators debate putting another multi-billion dollar bond measure in front of voters. More dams, increased conservation, water transfers, desalination and more – there are many possibilities, each with its benefits and drawbacks. There is no easy answer; unfortunately, no silver bullet

Freshwater is too important a resource to be the subject of guesswork. Underestimating its usage and over-estimating its availability can have cataclysmic effects upon Southern California. Serious economic dislocation and even health issues for area citizens are just two. Given the discrepancies between the developer’s estimated water use and the EPA and LADWP’s experience about actual levels of consumption and further questions about the LADWP’s ability to supply water in the not-too-distant future, this project’s impact on the area’s water infrastructure needs to be re-analyzed.

2. WASTEWATER

The project should be mandated to capture and recycle storm water and grey water on-site.

3. ENERGY

Solar or alternate energy such as Bloom Energy Servers should be required. Currently 39% of the City’s energy comes from coal. This is being phased out. The City’s lease for the Navajo power plant expires in 2019 and the City’s contract for a coal generated plant in Utah ends in 2027. DWP has indicated that both plants will be shut down when the leases expire. In order to replace this loss, DWP is counting on, among other things, an increase from the current 20% renewable energy and 1% energy efficiency to 33% renewable energy and 10% energy efficiency.34 These assumptions may or may not be accurate. Increased use of renewable energy is commendable but also costly to consumers. Existing ratepayers should not have to bear the costs resulting from the increased demand created by this project.

Another impact that should be analyzed is the increased need for cell transmitters. No mention of this is made in the DEIR.

PUBLIC HEALTH IMPACTS

Large-scale developments like Ponte Vista have the potential to cause substantial adverse effects on health of residents, either directly or indirectly. Therefore, the

34 LADWP Presentation on Proposed Rates 2012-2014, Mandates and Reliability
DEIR must discuss “health and safety problems caused by the physical changes” (CEQA Guidelines Section 15126.2). If the analysis identifies significant health impacts, the lead agency must adopt feasible mitigations. Important determinants of public health include the preservation of natural areas, air and water quality, community noise, housing and transportation patterns, access to food resources, public services, and economic well-being.

The DEIR fails to evaluate and disclose potential health impacts resulting from lack of convenient access to daily needs. Proximity to services promotes increased walking and biking, reduced daily vehicle trips and miles traveled, increased possibilities for healthful and meaningful work, and increased interactions among neighbors. Future residents of Ponte Vista should have equal access to health resources. The more key public and retail services a neighborhood has, the greater the chance for residents and workers to walk or bike to access those services, increasing physical activity, social interactions, and “eyes on the street”. Research has found the presence of a grocery store in a neighborhood predicts higher fruit and vegetable consumption and a reduced prevalence of overweight and obesity. Neighborhoods with diverse and mixed land uses could create proximity between residences, employment, and goods and services, thereby reducing vehicle trips and miles traveled and as a result, reducing air and noise pollution. This is especially pronounced because of the difference between the estimates of project completion, i.e. five years or fifteen years, and the resulting impacts on construction related emissions and impacts.

The DEIR fails to address the following Public Health related questions:

- Does Ponte Vista have all of the key public and retail services that contribute to neighborhood completeness?
- Does the Ponte Vista plan advance neighborhood completeness?
- What mitigations or project design elements would advance neighborhood completeness?

SOCIAL IMPACTS

“In much of the rest of the world, rich people live in gated communities and drink bottled water. That’s increasingly the case in Los Angeles where I come from. So that wealthy people in much of the world are insulated from the consequences of their actions.”

Jared Diamond, author, physiologist, evolutionary biologist and bio geographer.

A neighborhood offers the promise of belonging and call for us to recognize our interdependence. To belong is to be welcome, even if we are strangers. The sense of belonging is important because it leads us from conversations about safety and comfort to our relatedness and willingness to be generous and
hospitable. These elements seldom occur in a culture dominated by isolation, and it correlate, fear.

The proposed narrow range of housing types forestalls the socioeconomic robustness that accrues to places with a full spectrum of ages and income. The proposed gated subdivision intentionally restricts access and emphasizes social control and security over other community values, thereby shrinking the public sphere and diminishing collective responsibility for the collective safety of society.

A security gate “can provide a refuge from people who are deviant or unusual… the vigilance necessary to patrol these borders actually heightens residents’ anxiety and sense of isolation, rather than making them feel safer,” says Setha Low, author of *Behind the Gates, Security, and the Pursuit of Happiness in Fortress America,* The irony is that the residents, particularly kids and seniors that don’t drive, become isolated and trapped behind their own gates -- instead of keeping people out, they shut themselves in. The isolation and loneliness is increasingly becoming the cause for mental illness.

Gated subdivisions gained popularity with baby boomers. The demographics have changed. Today, a large cohort of empty nesters and Generation Ys are increasingly opting out of isolated and gated subdivision to belong in an open, walkable and urban neighborhood.

**The DEIR fails to discuss the social impacts of a limited access exclusive subdivision.**

**PROJECT ALTERNATIVES**

The DEIR should analyze at least one additional alternative that better addresses the context of the community and environmental impacts of the project. We suggest a mixed-use project alternative that includes access to Mary Star, with true single-family homes on appropriate sized lots, rather than a PUD, work centers, commercial space, senior friendly facilities, a range of public open spaces including a 6-acre public park, and a library extension to meet State Guidelines for library space.
Additionally, given the poor jobs housing balance, it seems remiss that none of the alternatives included a light industrial park. This is particularly true in light of the fact that the original re-use plan for this property would have resulted in significant job creation.\textsuperscript{35}

**ATTACHMENTS**

- **Attachment A**  
  Tosco Worst Case Scenario
- **Attachment B**  
  Critical Facilities and Lifeline Systems in the City of Los Angeles
- **Attachment C**  
  San Pedro Building Types
- **Attachment D**  
  Single Family Housing Construction Costs
- **Attachment E**  
  LAUSD School Enrollments for Taper, Narbonne, and Dodson

\textsuperscript{35} According to the Draft EIR for the San Pedro Community Plan, the jobs-housing ratio for San Pedro is 0.44 while it is 1.3 for Los Angeles as a whole.
ATTACHMENT A
WORST CASE SCENARIO

WORST CASE SCENARIO ASSUMPTIONS FOR BUTANE:
- Everything in a refrigerated butane storage tank is released instantaneously.
- Safety controls are not considered.
- Butane completely vaporizes and explodes.

DISTANCE OF POTENTIAL IMPACT:
2.3 MILES

PUTTING IT INTO PERSPECTIVE
Worst Case Scenario Amount Released ........................................ 5,692,000 Gallons
Alternate Release Scenario Amount Released .................................. 6,160 Gallons

ALTERNATE RELEASE SCENARIO

ALTERNATE RELEASE SCENARIO ASSUMPTIONS FOR BUTANE:
- Release of 30,000 lbs in 15 minutes.
- Safety controls operate as designed to minimize release.
- Typical weather conditions exist.

DISTANCE OF POTENTIAL IMPACT:
0.11 MILES
ATTACHMENT B
SAFETY ELEMENT EXHIBIT H
Critical Facilities & Lifeline Systems
In the City of Los Angeles

Selected Transportation Routes
- State Highway
- Interstate Highway
- Federal Highway
- Caltrans Freeway Interchange
- Caltrans Pedestrian Crossing

Selected Emergency Facilities
- Major Acute Care Hospital (Capacity greater than 500)
- Other Major Hospital
- LA County Community Care Facility (Capacity greater than 300)
- Major Jail Facility

Selected Dependent Care Facilities
- Major Communication Center
- LA County Maintenance Warehouse
- LA City Maintenance Warehouse

Selected Lifeline Facilities
- Gas Compression Station
- Electrical Power Plant
- Water Treatment Plant
- Waste Water Treatment Plant
- Major Transmission Substation
- High Voltage Transmission Line (400 kv Plus)
- Underground Electrical Transmission Line
- Major Aqueduct

NOTES
1. This map is intended to portray the general distribution of community elements vulnerable to damages from a variety of hazards. In order to achieve this, map symbols, are in general, simplified and located at major facilities and features.
2. Disaster routes facilities accomplish through-put by movement of emergency response traffic and access to local facilities. Intermediate emergency services centers and rescue/welfare camps for short-term emergency operations will be emphasized along these routes.
3. The selected disaster routes also provide sites for interpretation and need documentation and data in following a major disaster.
4. The symbolism of puckering critical facilities related heavily upon Caltrans Division of Mines and Geology, Cal Aqueduct Division, and General Services Administration, as appropriate.
5. This map is intended for general land use and disaster planning purposes only.

Source: LA County Safety Element Technical Appendix, Plan 6, December 1988 & General Plan Framework OR

Prepared by the General Plan Technical Assistance Group (GPTAG) - April 1993 - Council Feb 88 - 04-94-50
ATTACHMENT C
ATTACHMENT D
## SINGLE-FAMILY RESIDENTIAL
### BUILDING SPECIFICATIONS
#### "D" CONSTRUCTION

<table>
<thead>
<tr>
<th>Post 1990</th>
<th>D-6 Quality</th>
<th>Modern</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Foundation</strong></td>
<td>Reinforced concrete</td>
<td></td>
</tr>
<tr>
<td><strong>Floor Structure</strong></td>
<td>Standard wood frame or slab on grade reinforced concrete, vapor barrier, base 4&quot; thick</td>
<td></td>
</tr>
<tr>
<td><strong>Walls and Exterior</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Framing: Standard wood or steel frame</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sheathing: Line wire and paper, plywood, or particle board</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cover: Wood shingles or low-cost wood siding or masonry trim on front wall; average stucco sides and rear</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Windows: Average quality aluminum or wood; slide or double hung, double glaze</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Front Door: Average quality metal or wood</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Roof</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Framing: Standard wood or steel frame</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cover: Wood shingle, light wood shake, good composition shingle, or concrete shake or tile</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overhang: 0&quot; to 18&quot;, unceiled</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gutters: Average quality at all eaves</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Floor Finishes</strong></td>
<td>Average quality hardwood, carpet, vinyl, or ceramic tile throughout</td>
<td></td>
</tr>
<tr>
<td><strong>Interior Finish</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Drywall, taped, textured, painted; some wallpaper; average quality paneling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Decorative plant shelves</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ceilings: Standard 8’ or vaulted; low-cost fans</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Interior Detail</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interior Doors: Average quality wood</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trim: Wood or plastic</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Closets: Average amount; low-cost doors</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Bath Detail</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number: Two</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Floors: Average quality vinyl</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Walls: Drywall and enamel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shower &amp; Tub: Fiberglass or average quality ceramic tile, with glass doors; twin basin vanities</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Kitchen</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Base Cabinet: Average cost wood veneer</td>
<td></td>
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<tr>
<td>Wall Cases: Average cost wood veneer</td>
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<tr>
<td>Drain Board: Average cost plastic laminate or vinyl tile</td>
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<tr>
<td>Some island cabinets without fixtures</td>
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<tr>
<td><strong>Plumbing</strong></td>
<td>Galvanized, plastic, or copper pipe; 7 average-cost fixtures; washer outlet; water heater</td>
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<tr>
<td><strong>Special Features</strong></td>
<td>Average quality sliding glass or French doors; average quality built-in oven, range, microwave, dishwasher, garbage disposer, range hood and fan; utility room/closet</td>
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<tr>
<td><strong>Electrical</strong></td>
<td>Cable wiring; average quality fixtures; some bedroom ceiling fixtures</td>
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### SINGLE-FAMILY RESIDENTIAL BUILDING SPECIFICATIONS
### "D" CONSTRUCTION

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<td><strong>Foundation</strong></td>
<td>Reinforced concrete</td>
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<td><strong>Floor Structure</strong></td>
<td>Standard wood frame or slab on grade reinforced concrete, vapor barrier, base 4&quot; thick</td>
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<td><strong>Walls and Exterior</strong></td>
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<td>Framing:</td>
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<td>Sheathing:</td>
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<td>Cover:</td>
<td>Good wood siding, masonry, or stucco</td>
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<tr>
<td>Windows:</td>
<td>Vinyl framed wood or aluminum; divided light; slide or double hung, double glaze</td>
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<tr>
<td>Front Doors:</td>
<td>Single or double, good quality decorative wood or metal; glass trim; side glass panels</td>
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<td><strong>Roof</strong></td>
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<td>Framing:</td>
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<tr>
<td>Cover:</td>
<td>Heavy wood shake, concrete shake, tile, or high definition composition roof</td>
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<td>Overhang:</td>
<td>0&quot; to 24&quot;, ceiled or unceiled</td>
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<td>Gutters:</td>
<td>Good quality at all eaves</td>
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<td><strong>Floor Finishes</strong></td>
<td>Terrazzo, mission, or quarry tile in entry; good hardwood, carpet, vinyl, slate, or quarry tile throughout</td>
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<td><strong>Interior Finish</strong></td>
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<tr>
<td>Drywall with good texture and paint; custom decorative woodwork and molding; rounded corners; some good wallpaper, vinyl wall cover, or veneer paneling</td>
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<td>Ceilings:</td>
<td>Standard 9' to 11', vaulted, crown molding, coffered, or arched; good quality fans</td>
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<tr>
<td><strong>Interior Detail</strong></td>
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<tr>
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<td>Trim:</td>
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<td>Decorative plant shelves and art niches</td>
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<td>Closets:</td>
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<td>Floors:</td>
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<td>Shower &amp; Tub:</td>
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<td>Base Cabinet:</td>
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<td>Galvanized, plastic, or copper pipe; 10 good fixtures; washer outlet; two water heaters</td>
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<td>Multiple sliding glass or French doors; good quality built-in double oven, range, dishwasher, garbage disposer, range hood and fan, microwave, compactor, and wet bar; utility room with laundry sink; pre-wired for security; walk-in pantry; hot water recirculator; fireplace</td>
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SINGLE-FAMILY RESIDENTIAL
MODERN - POST 1990
D-6 QUALITY
SINGLE-FAMILY RESIDENTIAL
MODERN - POST 1990
D-8 QUALITY
ATTACHMENT E
School Profile

TAPER EL

1824 Taper Ave
San Pedro, Ca 90731

Office: 310-832-3056
Fax: 310-546-4485

(*Note: This profile includes magnet center information.)

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School Profile

DODSON MS

28014 Montereina Dr
Rancho Palos Verdes, Ca 90275

Office : 310-241-1900
Fax : 310-832-4709

(*Note: This profile includes magnet center information.)

GENERAL INFORMATION
Principal : Vladovic, John
Location Code : 8110
Educational Service Center : S
Configuration : 6- 8
Calendar : 1 TRK
Number of Tracks : 1
Year Opened :
Cost Center Code : 1811001
Charter : No
Learn : Yes
SBM : No
Assembly : 66
Senate : 26 Curren Price
Congress : 33 Karen Bass
Council : RPV Rancho Palos Verdes
Supervisor : 4 Don Knabe
Board of Education : 7 Richard Vladovic
Web Site : www.lausd.k12.ca.us/Dodson_MS

Student Racial & Ethnic History

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2010-11
2009-10
2008-09
2007-08

64
School Profile

NARBONNE SH
24300 S Western Ave
Harbor City, Ca 90710
Office : 310-257-7100
Fax : 310-326-1805

(*Note: This profile includes magnet center information.)

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**GENERAL INFORMATION**

Principal : Kobata, Gerald
Location Code : 8779
Educational Service Center : S
Configuration : 9-12

Calendar : 1 TRK
Number of Tracks : 1
Year Opened :

Cost Center Code : 1877901
Charter : No
Learn : Yes

Assembly : 66
Senate : 35
Congress : 43
Council : 15 Janice Hahn

Supervisor : 4 Don Knabe
Board of Education : 7 Richard Vladovic
Web Site : www.narbonnehsgauchos.com

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**Student Racial & Ethnic History**

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**RACIAL & ETHNIC HISTORY**

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