

NORTHWEST SAN PEDRO NEIGHBORHOOD COUNCIL  
COMMENTS ON PONTE VISTA SPECIFIC PLAN

The Board of the Northwest San Pedro Neighborhood Council (NWSPNC) reviewed the draft Specific Plan and Design Guidelines for Ponte Vista and adopted the following initial comments. These comments augment those we submitted on the Draft EIR. Please note that these are initial comments and we reserve the right to add to or alter them.

The NWSPNC wants this land to be developed as soon as possible. We are not seeking to delay the development but rather to ensure that what is built is the best fit for our community. Additionally, we have a responsibility to our community to ensure that the applicants follow a public process. We are anxious to work together to move the process along.

**The proposed Specific Plan does not meet identified community needs, lacks the specificity and process required for such a plan, and should not be adopted.**

A Specific Plan should provide certainty that what is in the plan will be what is built. In this case, rather than presenting a Specific Plan, the applicant has submitted a conceptual plan with design guidelines.

The Specific Plan

- A. Is grossly deficient and incomplete
- B. Is not consistent with Community Plans
- C. Provided limited opportunity for public participation
- D. Ignores the Context of the Community
- E. Contains Design Deficiencies

The process of developing the Specific Plan should be the same as the process of developing a community plan. In this case, the applicant has not engaged in such a process, and the resulting Specific Plan is neither specific nor consistent with the San Pedro Community Plan.

The proposed development does not meet any identified community need. It does not provide traditional single family housing, housing for seniors, public open space, jobs, nor library space, all of which are in demand in our community. At the same time, it would detract from the much desired and planned for development in downtown San Pedro and downtown Wilmington.

At a minimum the plan should:

- Include at least as much real public open space as the existing zoning (15 acres)
- Have public roads; not gated
- Include senior housing
- Include on-site amenities to reduce need to travel from site
- Be consistent with the character of San Pedro

## **A. The Specific Plan is Grossly Deficient and Incomplete**

A Specific Plan is typically organized into a comprehensive document that addresses development policies, includes regulations for development, and a capital improvement program all within a single document.<sup>1</sup>

The Draft Specific Plan is lacking in many areas, as enumerated briefly below, and also:

- Presents guidelines rather than standards
- Is inconsistent in the details
- Violates its own design guidelines with the floor plans described

The draft Specific Plan lacks:

- an analysis of the regional and local context;
- findings on how the specific plan complies with the General Plan;
- an overall physical vision;
- goals and policies;
- a robust development code that produces predictable outcomes;
- an infrastructure plan for transportation, streets, public and private parking, water, sewer, and storm water;
- an implementation plan with an economic strategy for proposed infrastructure and public facilities and phasing of improvements

### ***Presents Guidelines rather than Standards***

As stated throughout the plan, the “graphics are used to illustrate design concepts ... and are not meant to convey exact design requirements.”<sup>2</sup> The proposed regulations are design guidelines that can be ignored or modified administratively, without community involvement. Guidelines are recommendations that encourage, but do not require, their use. In short, there is no predictability -- what’s in the document may not be what is actually built.

Design guidelines offer too much room for subjective interpretation and are difficult to enforce. A developer can legally refuse to comply. Design Guidelines require oversight by discretionary review bodies, leading to a protracted and politicized planning process that can cost time and money. The “abuse and misuse” continues with discretionary review and unpredictable outcomes fueling community mistrust.

Adding to this mistrust is the fact that the applicant does not intend to develop the property but rather is proposing to subdivide the property. In essence, the community is being asked to trust different unidentified and unknown developers for each parcel.

---

<sup>1</sup> The California Government Code, Title 7, Division 1, Chapter 3, Article 8: Specific Plans, Section 65451: Content of Specific Plans.

<sup>2</sup> Ponte Vista Design Guidelines, page 5, section 1.2: Ponte Vista Design Objectives

***Examples of lack of specificity include the following:***

- p. 7 indicates that the “improvements...shall be maintained by the Master Homeowners Association...in first-class condition consistent with applicable maintenance standards...” However no maintenance standards are provided.
- P 24 “Accent trees are ‘encouraged’...” This type of language “encouraged” rather than “required” is consistently used throughout the document.
- P 28 “The street scene elevations and floor plans represent possible solutions...other elevations and plans may be proposed...” In other words, what is approved will not necessarily be what is built.
- The applicant claims the apartments will be “luxury” apartments yet there are no standards provided to justify this statement. When asked, the applicant’s representative stated that the “rent” would put them in that category.
- The applicant’s representative also claimed that they would be built to condo standards yet there is nothing in the specific plan to justify that characterization.

***Inconsistent in the Details***

Public Amenities: The Plan states that the intent of the Design Guidelines is “so that new development can make a positive contribution to built environment, provide public amenities, and increase neighborhood identity.”<sup>3</sup> Besides the sidewalk (trail) and the access to the school the plan does not provide any “public” amenities.

Pre-approved Design Types: The Plan states that “the design guidelines also identify pre-approved design types to facilitate the plot plan approval process.” In the very next paragraph, the plan states that “the graphics are used to illustrate design concepts, they should be viewed as representations of the guidelines or standards to depict their meaning or intent, and not meant to convey exact design requirements.”<sup>4</sup> if the plans and elevations are conceptual representations, what exactly is being pre-approved?

Entrance and Passageways: The Guidelines indicate that the “Primary Entrance to buildings shall be oriented to the street front, rather than to the parking lot, alley, or interior of lot.” The specific drawings show many buildings oriented away from the street front.

Inconsistent Street Sections: All of the private street dimensions in the design guidelines (pages 8-27) are different from those specified on the vesting tentative tract map (dated 9/18/12, sheet 3 of 9)! Additionally, the photos, such as the one on page 19, and the large grassy median on page 21, do not appear to correctly reflect the plan.

Following is a summary comparison that illustrates the inconsistency (in red):

---

<sup>3</sup> Ponte Vista Design Guidelines, Section 1.2 Ponte Vista Design Objectives, page 5.

<sup>4</sup> *ibid.* 8

Private Street	R.O.W width		Sidewalk width		Parkway width		Cartway width	
	DG	TTM	DG	TTM	DG	TTM	DG	TTM
Street A (pages 18-19)	66'	76'	5'	6'	10'	10'	36'	44'
Street B (pages 24-25)	57'	60'	4'	6'	6'-6"	6'	36'	36'
Street C (pages 26-27)	57'	40'	4'	6'	6'-6"	None	36'	28'
Street D (pages 16-17)	95'	100'	5'	6'	10'	10'	40'	48' <sup>c</sup>
Street F (pages 22-23)	?	36'	5'	5'	?	1'	27'	24'
Street G (pages 26-27)	57'	46'	4'	5'	6'-6"	6'	24'	36'

- a TTM: Tentative Tract Map
- b DG: Design Guidelines
- c Street D has a median -- DG and the TTM show 25' and 20' width for the median, respectively.

For School Access Drive, the Guidelines say, “a parallel walk/trail runs along the drive and serves as a multiuse trail providing students access from, and through the community.”<sup>5</sup> The multiuse trail is a 5' wide sidewalk. The students do not have access to the gated community -- instead they are restricted to School Access Drive, which will be accessible during defined school hours only.

Walls and Fence: The wall and fencing diagram (page 119) shows a “view fence” along the northern most section of the site. The preliminary grading plan (sheet 5) and section L-L and A-A (sheet 9) show extensive grade (40 to 50 feet elevation) and what appears to be a 10 foot tall “retaining wall.” A solid retaining wall is not likely to preserve any views!

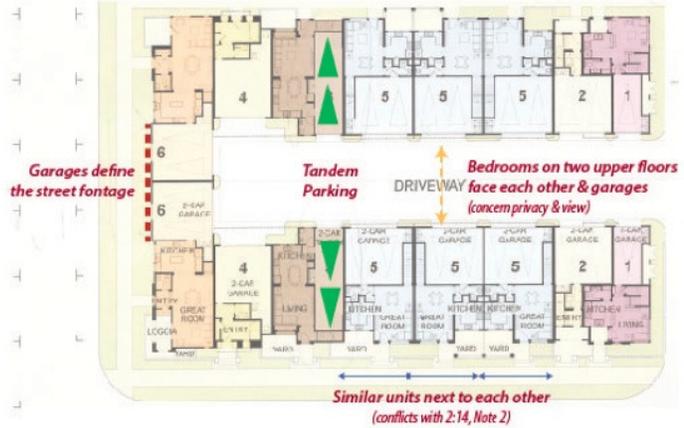
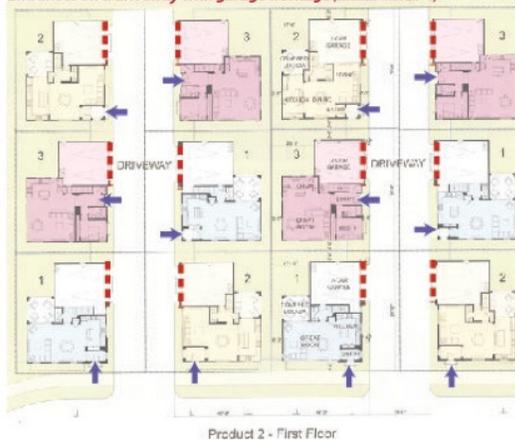
Trails: The Open Space Exhibit and associated text indicate that an 8 feet wide perimeter trail will be available for public access. The preliminary grading plan and Section B-B (sheet 9) show a narrow and continuous two-step retaining wall with steep grades. It is not clear where the 8 foot wide trail would fit and where the access point for the public trail would be?

### ***Floor Plans Violate Design Guidelines and Create Substandard Environments***

The proposed floor plans (see top image on following page) violate the design guidelines. But more importantly they create a substandard living environment characterized by 2 - 5 foot rear yards, main entrances off a driveway, frontages defined by garages, squeezed tandem parking, and three-story massing off a 28 foot driveway that compromises privacy of bedrooms that face each other or garages.

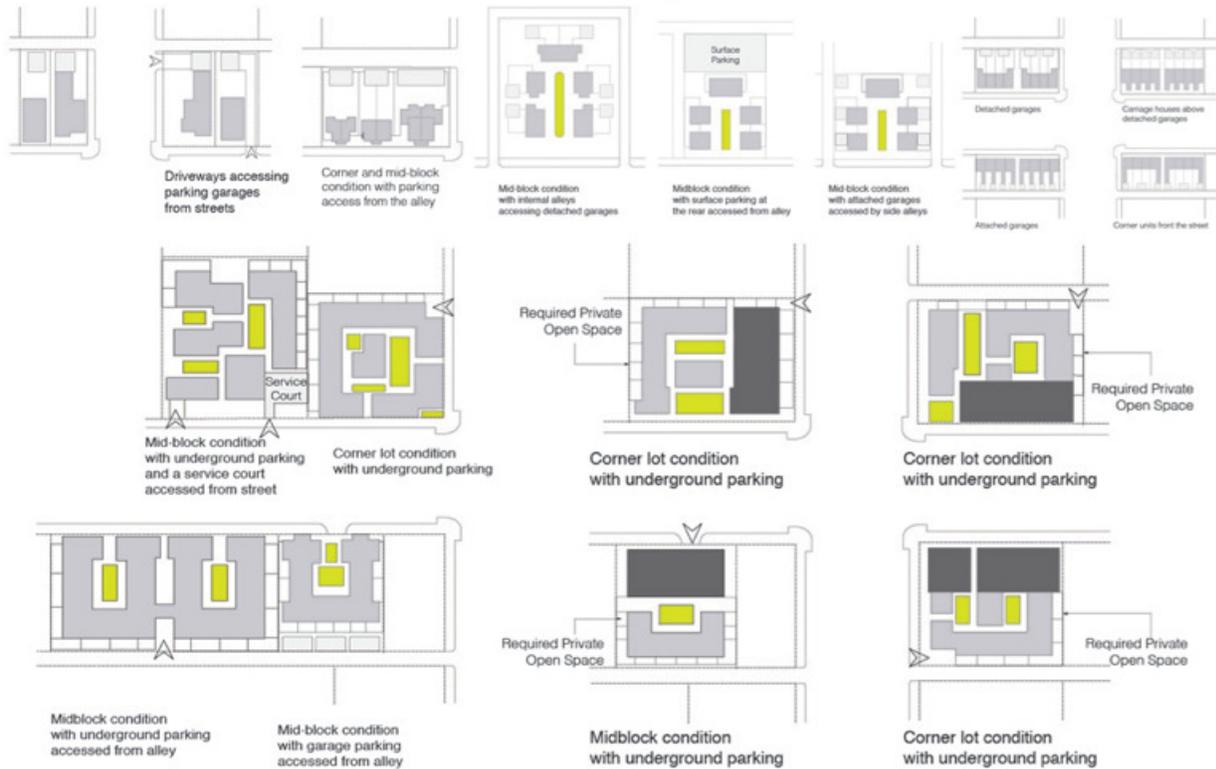
<sup>5</sup> Ponte Vista Design Guidelines, page 22.

Entrances off a driveway with garage frontage (conflicts with 2.7-1)



The diagram below shows a range of residential building types that first and foremost address the street but also produce a rich variety of desirable living environments. The range includes building types typically found in Southern California such as single-family residence, duplex, triplex, quads, row houses, courtyard houses, and hybrid court.

Few recommended residential building types for Ponte Vista



The example in the illustration of recommended residential building types for Ponte Vista (lower illustration on the previous page) shows how different building types can be combined on individual blocks around varying street and open space types to respond to changing context.

## **B. The Plan is Not Consistent with Community Plans**

A Specific Plan is a tool for the orderly implementation of the City's General Plan<sup>6</sup> and cannot be adopted unless it is consistent with that plan.<sup>7</sup> The proposed project is not consistent with the San Pedro and Wilmington Community Plans. Furthermore, the proposed project does not meet any identified community need.

The recently developed San Pedro Community Plan (SPCP) recognized that while this parcel is just outside the Plan area, the property is located within the community of San Pedro and development on this large parcel would impact the SPCP area. The proposed scheme violates the policy recommendations of the draft San Pedro Community Plan. The applicant has completely ignored these policies and design guidelines and opted to exclusively rely on the outdated Wilmington-Harbor Community (WHC) plan -- arguably, because the site is located in WHC plan, just outside the SPCP area.<sup>8</sup> This action typifies a mindset of ignoring community desires for a dogged focus on minimum compliance.

Both the San Pedro and Wilmington Harbor City Community Plans have planned for increased density in their downtown areas. The proposed density at this site would detract from development of those areas and further delay their renaissance.

The proposed project does not meet the identified need for affordable senior housing and assisted living facilities, active recreation space, jobs, or additional library space. Nor does it meet a need for workforce housing. According to the San Pedro Community plan there are only 0.44 jobs per household in the plan area.

While generally inconsistent with the San Pedro Community Plan, we particularly note the following inconsistencies:

- LU 3.5 "Ensure that the new development of multi-family, duplex, small lot subdivisions or lower density units located in or adjacent to single-family neighborhoods maintains the visual and physical character of single family housing and be designed to respect and complement the architectural and building patterns of surrounding existing residential development
- LU 4.5 that calls for Ponte Vista to be "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."

---

<sup>6</sup> The Planner's Guide to Specific Plans, Governor's Office of Planning & Research, January 2001.

<sup>7</sup> Government Code §65455

<sup>8</sup> The proposed scheme also violates WHC Plan and other regional, city, and local policies. See Northwest San Pedro Neighborhood Council's comments on DEIR January 7, 2013, pages 15-26.

- M5.4 “Encourage large developments to provide on-demand shuttle services to Metro stations and major activity centers or destinations in and around San Pedro.”

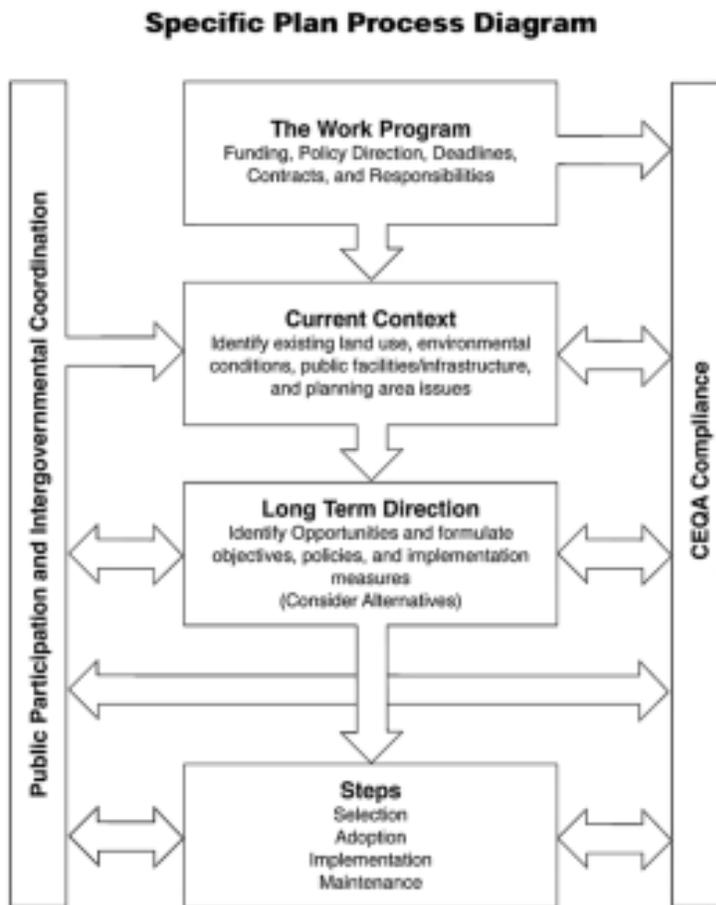
Please see NWSPNC Comments on DEIR pages 17-22 for further discussion of inconsistency with community plans.

Furthermore, the plan ignores the fact that the northern boundary of the property abuts heavy industrial hazardous usage. The San Pedro Community Plan calls for buffers between such uses and homes.

## C. The Plan Offered Limited Opportunity for Public Participation

A Specific Plan should be based on a community driven vision that conceptualizes a public realm by pulling together the individual elements: the diverse street types, variety of public and private open spaces, and contextual building types into a complete, cohesive, and memorable place. There should be meaningful public participation in the development of the plan. In this case public participation was limited to meeting with our Planning and Land Use Committee to discuss the Traffic Study.

*Illustration A – Specific Plan Process Diagram*



Section 65453 states that “A specific plan shall be prepared, adopted and amended in the same manner as a general plan...” as such, opportunities for the involvement of citizens, public agencies, public utilities, civic education, and other community groups must be provided pursuant to §65351. Meaningful early public participation during preparation of the Specific Plan from community groups, residents, businesses, regional and city agencies, school district, and other stakeholders would not only allow for a thorough inspection of all issues but also gain general support for approval and implementation of the specific plan. If the applicant had followed this process, we would be

supporting the resulting plan. In this case, the Specific Plan was prepared in isolation with virtually no community input. It is tragic that community participation has been reduced to reacting to a scheme that we had no role in shaping.

The Specific Plan, which includes policy, code, and capital improvements, must be developed under an open participatory public process. This could be a charrette, a series of workshops, or back-and-forth series of designs and presentations. A discovery process is involved, in which anyone can bring forth an issue. The process must include every significant interest in the community -- must be transparent and open. The design should happen iteratively, so that people can be engaged back and forth. There should be a follow-up series of presentations and workshops, so people can clearly see the result of their participation. The public process can range from large public meetings to very small for detailed discussions. It is unfortunate that none of this was done!

## **D. The Plan Ignores the Context of the Community**

The development of a specific plan should start with an analysis of the local and regional context including issues such as mobility, view corridors, hydrology, infrastructure constraints and the community's physical context comprised of building, frontage, street, open space typology. There is only an extremely limited discussion of the local context.

The Design Guidelines state that the new structures should be at a scale that is appropriate to the street and surrounding neighborhood context.<sup>9</sup> Yet, the proposed development is unlike the preponderance of homes and neighborhoods in San Pedro and stands in stark contrast to the local context. Examples include the lack of yard space for the so-called "single-family" homes, high impervious lot coverage, extremely small setbacks (some as small as 3 feet in the front and 2 feet in the back), heights up to 65 feet compared to 30' maximum in the surrounding area, and a gate restricting public access. The design guidelines for the "single family" homes would violate the recently adopted "mansionization" ordinance if they were requesting R-1 zoning. The proposed long six-story building (with exposed parking garage facade) located adjacent to the existing buildings located north of Fitness Drive would block access to light, air, and views from existing and proposed apartment building.

We recommend the applicant conduct a survey of the adjacent area (the context) and document the findings in the Specific Plan as the basis for the proposed plans. The survey should identify the type of buildings, frontages, streets, and public and private open spaces existing in the area along with the relationship between the buildings and the open spaces. The proposed plan should build on the desirable elements in the area and complement the area by addressing any noted deficiencies, such as a lack of public open space and inadequate library facilities.

---

<sup>9</sup> Design Guidelines, p. 29

## ***Gated Community***

The gated nature of the development does not promote integration within the larger community of San Pedro. In fact it does the opposite. Gates divide communities and attract like-minded residents who seek shelter from outsiders and shirk the notion of civic engagement. In fact, gated communities create an unsafe environment both inside and outside the gates.<sup>10</sup>

Additionally, the Draft EIR acknowledges that the development is not within the LAMC standards for distance from an LAFD fire station, but the Draft EIR fails to mention the anticipated response times for emergency medical services provided by LAFD.

Response times for fire units and/or for emergency medical services to the development should not be, therefore, further delayed by time spent accessing the gate (code or key) and waiting for a gate to roll back. Would the residents want the gate locking out first responders?

## ***Lack of Facilities for Seniors/Persons with Disabilities***

Both the San Pedro and Wilmington Community Plans point out the need for senior housing. The San Pedro plan states: “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 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.”<sup>11</sup>

The Wilmington Harbor City Plan wants to “encourage the development of housing types intended to meet the special needs of senior citizens and the physically challenged.”<sup>12</sup>

## ***Design Styles Not Consistent with Community***

The “California Modern” style is not a good fit for San Pedro with its Craftsman Bungalows, Mediterranean, and historic Spanish architectural styles. The San Pedro Community Plan states that planned unit developments should “respect and complement the architectural and building patterns of surrounding existing residential development.”

---

<sup>10</sup> Blakely, E.J., and M.G. Snyder (1998), “Separate places: Crime and security in gated communities”

<sup>11</sup> Draft San Pedro Community Plan, August 2012, p. 37.

<sup>12</sup> Wilmington Harbor City Community Plan.

## **E. The Plan Contains Design Deficiencies in Public Spaces and Infrastructure**

### ***Lack of Public and Private Open Space***

A well-designed plan starts with the open space and designs around it. This plan seems to leave open space as an afterthought. Approximately 15 acres of the property is zoned for open space yet no public park is proposed. The proposed plan would build housing on all of the open space and provides no usable park for active recreation even for residents. According to the newspaper “about 18% of the property will be open space in the form of playgrounds, pocket parks and publicly accessible hiking and biking trails.”<sup>13</sup> We question this characterization.

The Specific Plan says “the perimeter trail together with the park or recreational space ... are hereby found to satisfy the requirements of Section 17.12 of the Code for dedication of real property for park and recreational purposes, or for the payment of a fee (Quimby) in lieu thereof...” This statement contradicts public statements made by the developer that they will pay \$2.5 million in Quimby fees.

Furthermore, the proposed trail along School Access Drive is a sidewalk! It is ludicrous to identify a street sidewalk as open space. Not only that, but it does not appear that there is any public access beyond the Mary Star gate and the sidewalk along Western Ave. This is contrary to Attachment A14 that states “The open space and trail network surrounding the perimeter of the Project are available for public use during certain hours. In addition, public parking is available on the entrance to the Mary Star access road.”

The plan does not meet the requirements of the City’s Public Recreation Plan that calls for 10 acres of land per 1,000 persons and provides that “a minimum of 10% of the total land area should be in public recreation or open space.” The Plan also says that Neighborhood Parks should be provided at a minimum of two acres per 1,000 residents and be five to ten acres in size with a service radius of approximately one-half mile. According to the Recreation Plan, Neighborhood Recreation Sites typically include facilities for active sports such as softball, basketball, soccer, and volleyball.<sup>15</sup> The plan fails to provide for such active recreation.

The Guidelines (p94) indicate that “A multi-use central park lawn at the core of the parking area allows for such program uses as a farmers market, art shows, and car shows...” This statement is unrealistic. These types of activities are generally held in public areas, not deep within a gated community!

---

<sup>13</sup> Ponte Vista Deal or no Deal? By Zamna Avial, Assistant Editor, RLN, January 25-February 7, 2013.

<sup>14</sup> Attachment A, Ponte Vista Project Vesting Tentative Tract Map

<sup>15</sup> Los Angeles Public Recreation Plan

The proposed Neighborhood Pocket Parks<sup>16</sup>, lack specificity as to the amenities that will be provided in them. There is a nice photo, for example, showing a children’s play structure but no requirement that such a structure be constructed.



With the exception of two private recreation areas (total 1.9 acres), the vast majority of the private open spaces are residual space totaling approximately one acre, street landscaping, sidewalks and trails (see open space plan at left). The areas in front of the homes are counted as open space. In reality, a large segment of this front yard will be driveways and garages.

Even the proposed open spaces are not well designed. In many instances the homes turn their back or sides on to the residual open space (see proposed pocket park on page 97). Visibility is an important design criteria for enhancing people’s comfort and security. The open spaces should be in the line of sight of adjacent land uses and activities to ensure visibility. The frontages should have active edges such as front doors, windows, stoops, or porches.

Public open spaces should not be residual spaces but instead must be the defining feature of the neighborhood, integrated with block, street, building and frontage standards to work in consort to create a unique place. For this site, open spaces should include a diverse range of integrated public and private spaces at the building, lot, block, and neighborhood 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.

The following are types of Open Spaces that could be provided at Ponte Vista and their intended character and function, along with an indication of what is proposed:

<sup>16</sup> Design Guidelines page 96

	Open Space Typology	Character and Function	Proposed by the Specific Plan
Neighborhood	Green	A mid-sized informal public space, often the focal point of the neighborhood. The green is enclosed by buildings, used for unstructured recreation, and planted with grass and trees.	None proposed.
	Square	A formal public space, no larger than a block, located at the focal point of civic significance, enclosed by key buildings, typically hard paved and allows passive recreation.	
	Plaza	A public space circumscribed by civic or commercial frontages, with formal landscaping.	
	Community Garden	A semi-private grouping of garden plots available for small-scale cultivation by residents of apartments and other dwelling types without private gardens. Community gardens strengthen community bonds, provide food, create recreational and therapeutic opportunities and promote environmental awareness and education.	
On the Block	Quadrangle	A private open space enclosed by buildings accessible by a small opening to the street	None proposed.
	Pocket Park	A fenced area for child's play within walking distance to nearby homes, closely overlooked by residents. The play areas contain soft and hard surfaces, play equipments, and benches with ample shade provided by tree cover.	No "public" pocket park is proposed. Ponte Vista residents will have access to private pocket parks.
On the Lot	Courtyard	A public or private open space surrounded by walls or buildings. The court is paved or landscaped.	Proposed building types don't include courtyard.
	Terrace	A private outdoor extension of a building above ground level that is used for gardening, entertaining, outdoor cooking, or relaxation.	None proposed.
	Yard	A private landscaped area of a lot. Typically, the area is free of buildings and structures. Exceptions include permitted encroachments such as porches, patios, and terraces. Portions of the private yard may be used as a kitchen-garden for small-scale cultivation of food.	The yards range from 2 feet to 12 feet.
Within the Building	Patio	A private outdoor space that adjoins a residence and is typically paved, within the unit	None proposed.
	Roof garden	Roof gardens are useful where yards may not be available. Roofs are also useful for small-scale cultivation.	None proposed.

### ***Is Deficient in Streets and Parking Plans***

The street plan and parking plan are inadequate and do not represent a plan that builds a community, or invites residents to engage with each other. Further, the street and parking plan are deficient in their consideration for emergency response vehicles within the property.

### **Streets Do Not Extend the Invitation to Walk**

How the building meets the street, and its frontages define the street character and make it walkable. As a transitional area, frontages allow the private life inside the building to appropriately interact with the public life. They can range in design and character depending on the context. For residential areas yards, porches, and stoop protect the privacy of residential areas while providing a place for social interaction. Small blocks 200 to 400 feet allow frequent intersections, and human scale buildings.

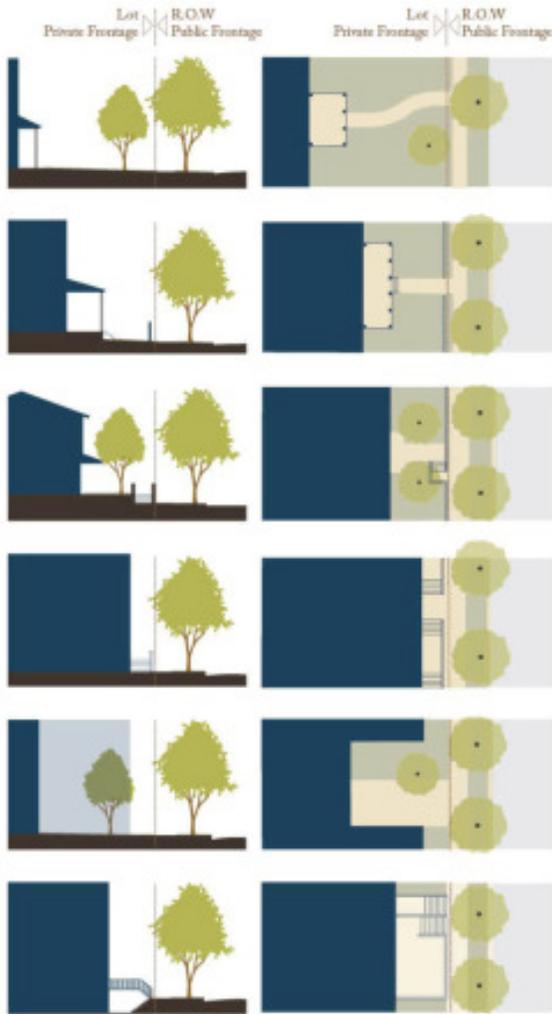
Front-loaded garage dominates the frontage of the house. The dominant feature on the house should be the main entrance for humans, not cars. Doors and windows allow the residents to monitor the street making streets safe and secured. The aesthetics of a garage door is largely opaque panels and results in indefensible places in front of the garages. Doors and windows are human-scaled elements that add interest to the facade. In contrast, the 20+ feet wide garage doors are drab utilitarian function better located behind the main facade and ideally accessed from a rear alley.

Furthermore, the driveway and the slope necessary to access the garage periodically interrupt the relative flat continuity of the sidewalk. Much to the chagrin of neighbors, driveways are frequently used for parking of cars, recreational vehicles, and pick-up trucks. The frequent curb cuts also make it difficult to provide on-street parking.

Therefore, front-loaded garages, driveways and curb cuts are not a good recipe for creating desirable walkable environments.

There needs to be a connection from the east side of the development to the “road to Mary Star” for use by children going to Taper Avenue School.

The illustration on the following page shows some residential frontages that make streets walkable. In the current scheme, these frontages are not proposed with consistency to create a walkable environment.



## Frontage Types for Ponte Vista



**Common Yard:** A frontage wherein the facade is set back substantially from the frontage line. The front yard created remains unfenced and is visually continuous with adjacent yards, supporting a common landscape. The setback can be densely landscaped to buffer from the higher speed thoroughfares.



**Porch & Fence:** A frontage wherein the facade is set back from the frontage line with an attached porch permitted to encroach. A fence at the frontage line maintains the demarcation of the yard while not blocking view into the front yard. The porches shall be no less than 8 feet deep.



**Dooryard:** A frontage wherein the facade is set back from the frontage line with an elevated garden or terrace permitted to encroach. This type can effectively buffer residential quarters from the sidewalk, while removing the private yard from public encroachment.



**Steop:** A frontage wherein the facade is aligned close to the frontage line with the first story elevated from the sidewalk sufficiently to secure privacy for the windows. The entrance is usually an exterior stair and landing. This type is recommended for ground-floor residential use.



**Forecourt:** A frontage wherein a portion of the facade is close to the frontage line and the central portion is set back. The forecourt with a large tree offers visual and environmental variety to the urban street streetscape. The forecourt may accommodate a vehicular drop-off.



**Lightcourt:** A frontage wherein the facade is setback from the frontage line by a sunken lightcourt. This type buffers residential use from urban sidewalks and removes the private yard from public encroachment.

The San Pedro Community Plan recommends “developing land use and development strategies that encourage walking, bicycling and crime prevention through environmental design; and supporting an active, inclusive, and responsive community where healthy habits are encouraged rather than discouraged by the environments we build.”<sup>17</sup>

### Lacks a Parking Plan

The proposed Specific Plan requires a minimum of 0.25 parking spaces per unit (or total of 208 visitor parking spaces). Some of the private streets (Local Street C and G) may be fire lanes. Their narrow widths may preclude on-street parking. It is not clear where the 208 visitor parking spaces would be provided. A visitor parking plan should be provided for each phase. How will “extra” vehicles be accounted for? What guarantee is there that the residents’ vehicles will not use up all of the public parking space?

<sup>17</sup> San Pedro Community Plan Draft August 2012, page 35.

The Guidelines and Tract Map do not provide any public (non-gated) parking for persons wanting to use the “multi-purpose” trail.

### **Lack of Design Considerations of On-Site Amenities to Reduce Traffic**

The project should include measures to reduce traffic impacts such as a mini-market/coffee shop (corner store), library kiosk, active recreation space, a work center, childcare center, dry-cleaning drop-off & pick up point, Fed Ex drop-off & pick up point, and units designed with office space separated from living quarters.

### ***Inadequate “Green” Features***

Ponte Vista design should offer a resilient/low carbon built environment, which is generally compact in form, with graduated densities, comprised of pedestrian-scale blocks and streets. The applicant has not included any alternative energy source such as solar panels, and has not included a system for on-site graywater reuse. Sustainable stormwater system should mimics or approximate the cleansing function of nature by integrating stormwater collection and discharge into building, site, and open spaces that minimizes the amount of runoff that has to be piped to treatment centers. What is proposed is to cover a very high percent of the property with impervious materials.

### **Additional Design Deficiencies**

Parking spaces (p32) should be enclosed, not just covered, and tandem style parking should not be allowed.

Product type 5 contains interior hallways rather than exterior entrances. This is not good planning.

Contrary to the statement in Appendix A, the property is not located along a “major bus corridor.” Furthermore, even if it were, Policy 5.2.3 cited on page 9—10 indicates the appropriate height to be two-stories over parking, not 4-5 stories.

Inadequate elevators are provided in product type 6 with its 65’ height limit.

Use of SB1818 could potentially increase the number of units to 1120 along with increasing the building heights.