

We all want to see redevelopment at this site. The comments below are intended to improve the layout, remove inconsistencies, and provide a reasonable level of predictability.

The Number Game:

The developer finds the current zoning standards as a barrier to redevelopment. The existing zoning would allow close to 300 units -- the applicant says it's not enough units to recoup what they paid for the land and make a profit. The question then is what is the right number. Who gets to decide what the right number is? How do you arrive at such a number?

Specific Plan Legislation:

The tool the developers have chosen to pursue relief from current standards is a Specific Plan. Section 65453 says, "a specific plan shall be prepared, adopted and amended in the same manner as a general plan." In this case, the Specific Plan has been prepared exclusively by the developer and their consultants and presented to staff and community for reactions and comments. The legislation intended the Specific Plan be prepared in "collaboration" not in isolation. It requires meaningful participation not only from citizens, but also utilities, fire department, civic and other community groups. It is our understanding from talking to the Fire Department that detail review will only occur if Council approves this development. At this point they will only issue few boilerplate conditions.

The draft San Pedro Community Plan includes specific recommendation for this site. Technically, the site is just outside the boundary of San Pedro Community Plan. Because the plan's recommendations are not consistent with the applicant's vision for the site, the recommendations are being ignored -- a conveniently selective strategy about community participation.

Proposed Vision:

The approach is a real estate development project -- to offer product types within an exclusive limited access subdivision, packing in as many lots as possible with not much creative gesture towards creating an authentic neighborhood (open, inclusive, and diverse) of unique place types. The subdivision is primarily designed around automobile use. The geography

of the place is defined by security gates and front loaded garages (rather than people-oriented front porches and entrances to homes from public street) that inhibit and severely compromise the walking experience. The dead end street in one instance would force next door neighbors to drive a quarter mile around the blocks to meet each other!

The location on Western Ave is not conducive to walking. The property has limited access and connections to the surrounding fabric. These are all design challenges that have design solutions. The proposed layout shrugs this responsibility and rather than addressing the challenges, it further exacerbates the challenges by putting up fences, gates, restricted access private streets and poorly designed homes on small lots.

Context

An important consideration, when increasing the intensity of an area is to respect context. This proposal ignores context.

Ignores the context established by open and accessible public streets and parks.

Ignores the context established by ratio of lot size to the size of home found in San Pedro Neighborhoods. The biggest lot in this development R-ID, has a 8 foot rear and front yard and a four foot side yard. The setbacks go down further for other product types. The rear setback for townhomes and flats is zero! No private open space for townhomes and flats! The building is simply out of proportion with the lot size -- unlike any other lot in this area.

Ignores the context established by the riparian corridor which rather than turning into a green infrastructure is paved over.

Public Safety

The proposed subdivision shows on-street parking on private streets. Are the private streets marked as fire lanes to ensure clear access? If they are, than on-street parking would not be an option. Also the many dead end streets would need to be required fire lane widths with appropriate turning radii for fire trucks. In a letter to the Planning Department, dated November 30, 2012, the Fire Department notes, "*fire lane width shall not be less than*

20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.” It is not clear where this 28 foot staging area would be provided on 36 feet wide streets with parking on both sides? The Planning Staff has been made aware that this is a very serious safety issue that should be addressed prior to the Planning Commission hearing.

Inconsistency

The dimensions for street sections for Community Entry Drive (44' or 52'), Community Spine Street (44' or 36'), School Access Drive (28' or 36') in the tract map (dated 9/25) are different from those prescribed in the Design Guidelines.

Design Guidelines or Standards

The floor plans and elevations are proposed to “*represent possible solutions for each product. Other elevations and plans may be proposed that comply with these design guidelines.*” This provision may produce completely different and unpredictable results. The term “guidelines” means recommended but not required. Are the design guidelines standards?

It is critical to either define the standards now or require a public review and hearing process later for the elevations and floor plans. Once the Specific Plan is approved the public have no say in the plan and elevations.

Page 30 of Design Guidelines, 2.7,1 says, “*the primary entrance to the buildings shall be oriented to the street front, rather than to the parking lot, alley, or interior of the lot.*” Is the woonerf a street for this provision? Three out of six floor plans on page 34 violate this provision.

“*Side or rear building entrances should always be accompanied by a front, street facing entrance.*” Is this provision consistent with the earlier provision on primary entrances?

The height limit for Product 4 is 35 feet -- which allows a three story building. The elevations and plans, however, only show a two story

building. From earlier provision, we know the elevations and plans are representative and can change. Besides the misleading graphic representation, a three story building is a problem because imagine the canyon established by two back to back facing 35 foot tall buildings separated by about 30 feet. Yes, the private bedrooms on the upper floor, 30 feet apart would look out into each other!

In similar vein, the maximum height for flats is 48 feet (tall enough to accommodate a 4 story building). The elevations and plans, which can be changed later only show a 3 story tall building.

The notes for townhomes (page 46) say each building shall not be a repetition of the adjacent building. The elevations on the very next page violate this note. The buildings are mirror images and repeated. Same comment holds true for the flats.

Product 6 allows 55 foot tall buildings -- a five story building height. Again, the elevations show only a four story building.

Open Space

The perimeter trail and open space (page 93) are not identified on the tract map to be dedicated as public space. It is also not clear, how the trail interacts with the heavily contoured portion of the site where the perimeter trail is proposed.

It is not clear how the public open space along Western Avenue will be graded? This portion has steep contours and it is important to understand universally accessible points for the park and the extent of levelled playground and retaining walls.