

To the members of the Governing Board of the Northwest San Pedro Neighborhood council

The following is my position on the Ponte Vista application for a zone change, specific plan and design guidelines, tract map approval, and approval of an EIR. As I cannot attend the special meeting on Saturday the 26th, please include my letter in the record of the proceedings.

Summary of position:

- The application does not adequately analyze a build-by-right alternative.
- The application does not provide any on-site traffic mitigation such as work-at-home or on-site facilities, child care on-site, small commercial space, or library extension space.
- Recreation space is far below City Planning Guidelines. So is library space.
- There has been no attempt to provide alternative energy on-site such as solar power, and no attempt to design buildings so alternative energy can be accommodated, such as by geographic orientation and roof strength.
- City Guidelines require density to be built along mass transit corridors. There is no mass transit available to the site.
- According to City Planning Department studies, three out of four workers living in the project will be long distance commuters. The project is not furnishing housing to meet local job demands.
- The analysis of a build-by-right project is completely inadequate. It is based on many assumptions but with no justification included, such as a need for recompacting the site instead of using existing building pads, a need for a separate road to Mary Star so that private gated roads can be built in the project, and a false land cost to provide a phony feasibility analysis.
- The storm water runoff control system is based on Rancho Palos Verdes is laughable.
- The traffic analysis remains questionable. Some examples of why it is questionable are, for example, an claimed increase of 30 vehicles on Westmont in AM Peak hour when the analysis shows several hundred additional students at Taper School. We all know parents drive their kids to that school, in part because of the dangers at Westmont and Taper. The larger indicator that something is wrong with the design is that the applicant claimed 16 intersections impacted with 1135 units, 15 intersections impacted with 830 units, and the same 15 impacted by 700 units. The lack of proportionality seems questionable.

- Their specific plan and design guidelines are inconsistent. In addition, they are asking for setback waivers in order to squeeze in more units that will impact the ability of the fire department to have adequate access to the units.
- The 2.89 acre park is illusory. When the parking for the park is taken out and the slope area for the street opposite Avenida Aprenda to Mary Star is taken out of the calculation, there is very little usable area remaining.
- The applicant still has not furnished access to Casa Verde or the other units to the south of the site that will allow use of the Mary star road onto Western.
- The project destroys the riparian stream that is essential to the drainage of both the site and the watershed on the west of Western Avenue.

Conclusion:

Your Governing Board has made numerous attempts to discuss the project with the applicant. Their response has been minimal. When they do engage, they are quick to claim that any changes they make means they are "entitled" to more units to make up the cost.

My biggest complaint is that the applicant has made a shoddy and shallow work effort and this reflected in the documents. It is made worse by its refusal to work with the community. They reflect an effort to obtain approvals as cheaply and as quickly as possible without regard to the impacts on the local community. Each supposed concession to the community was done in such a way as to provide sham benefits but at a cost saving to the applicant. For example, we asked for additional public park space. Their solution was to eliminate a swimming pool and clubhouse for residents and instead, design a misshapen sliver near Mary Star that was totally unusable.

Recommendation:

The applicant has shown no justification for changing the zoning on the site. The zoning should remain as it is until it provides adequate analysis and planning documents to support a different zoning.

As an option, I believe the alternative for 477 units and two small office buildings in Appendix B of the EIR is feasible and has merit as a build-by-right project and should be considered.