

**Appendix M      Comment Letters**



PUC

PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013



October 12, 2012

Debbie Lawrence  
City of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012

Dear Ms. Lawrence:

Re: SCH# 2008021004 San Pedro Community Plan

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the *Draft Environmental Impact Report (DEIR)* from the State Clearinghouse for the proposed City of Los Angeles (City) San Pedro Community Plan project.

RCES recommends that the City add language to the San Pedro Community Plan so that any future development adjacent to or near the shared railroad/light rail right-of-way is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way.

If you have any questions, please contact Ken Chiang at 213-576-7076, email at [ykc@cpuc.ca.gov](mailto:ykc@cpuc.ca.gov).

Sincerely,

Ken Chiang, PE  
Utilities Engineer  
Rail Crossings Engineering Section  
Consumer Protection & Safety Division

C: State Clearinghouse

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NAHC

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
ds\_nahc@pacbell.net



August 16, 2012

Ms. Debbie Lawrence, CEQA Specialist

**City of Los Angeles**

200 North Spring Street, Room 667  
Los Angeles, CA 90012

Re: SCH#2008021004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "San Pedro Community Plan Update Project;" located in the City of Los Angeles – San Pedro; Los Angeles County, California.

Dear Ms. Lawrence:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of *EPIC v. Johnson* (1985: 170 Cal App. 3<sup>rd</sup> 604):

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3 *et seq.* This project is also subject to California Government Code Section 65352.3 *et seq.*

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC "Sacred Sites" as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).



Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254( r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6257.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

**Native American Contacts**  
Los Angeles County  
August 16, 2012

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles , CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 86908  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
Gabrielino Tongva  
(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu  
Cindi M. Alvitre, Chairwoman-Manisar  
3094 Mace Avenue, Apt. B Gabrielino  
Costa Mesa, , CA 92626  
calvitre@yahoo.com  
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490  
Bellflower , CA 90707  
gtongva@verizon.net  
562-761-6417 - voice  
562-761-6417- fax  
Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address Gabrielino Tongva  
,  
tattnlaw@gmail.com  
310-570-6567

Gabrielino-Tongva Tribe  
Bernie Acuna  
1875 Century Pk East #1500 Gabrielino  
Los Angeles , CA 90067  
(619) 294-6660-work  
(310) 428-5690 - cell  
(310) 587-0170 - FAX  
bacuna1@gabrieinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693 Gabrielino Tongva  
San Gabriel , CA 91778  
GTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe  
Linda Candelaria, Chairwoman  
1875 Century Pk East #1500 Gabrielino  
Los Angeles , CA 90067  
lcandelaria1@gabrielinoTribe.org  
626-676-1184- cell  
(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008021004; CEQA Notice of Completion; draft Environmental Impact Report of the San Pedro Community Plan; City of Los Angeles; Los Angeles County, California.

**Native American Contacts**  
**Los Angeles County**  
**August 16, 2012**

Gabrieleno Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393                      Gabrielino  
Covina                      , CA 91723  
(626) 926-4131  
gabrielenoindians@yahoo.  
com

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

**This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008021004; CEQA Notice of Completion; draft Environmental Impact Report of the San Pedro Community Plan; City of Los Angeles; Los Angeles County, California.**



**DEPARTMENT OF TRANSPORTATION**  
 DISTRICT 7, REGIONAL PLANNING  
 IGR/CEQA BRANCH  
 100 MAIN STREET, MS # 16  
 LOS ANGELES, CA 90012-3606  
 PHONE: (213) 897-0219  
 FAX: (213) 897-1337



*Flex your power!  
 Be energy efficient!*

September 27, 2012

Mr. Debbie Lawrence  
 City of Los Angeles  
 Department of City Planning Department  
 200 North Spring Street  
 Los Angeles, CA 90012

IGR/CRQA No. 120819-DEIR  
 San Pedro Community Plan  
 Vic. LA-110 /710 /47/213  
 SCH#2008071133

Dear Ms. Lawrence:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for The San Pedro Community Plan. The San Pedro Community Plan contains approximately 3,674 acres and is situated in the southern portion of the city of Los Angeles.

The Community Plan Area (CPA) is geographically located on the Palos Verdes Peninsula at the southern terminus of the Harbor Freeway Interstate 110 (I-110), and is adjacent to the Wilmington-Harbor City Community Plan Area. The CPA is also located adjacent to the Port of Los Angeles, the Pacific Ocean, and the city of Rancho Palos Verdes.

The highway system within the CPA generally follows a north and south grid system, except in areas adjacent to the coast. Most traffic enters and exits the area from the north. Freeway access to the San Pedro community is provided by the I-110 and I-710 freeways and the State Route (SR) 47 Vincent Thomas Bridge. There are several major streets in the San Pedro area that run north and south, including Western Avenue, Gaffey Street, and Harbor Boulevard. Streets that run east and west include 9<sup>th</sup> and 25<sup>th</sup>.

Caltrans concurs that the proposed updated San Pedro Community Plan will potentially cause significant traffic impacts to the State Highway System. SR-110, SR-47, and SR-213 will be significantly impacted since these routes are the major north and south corridors into the San Pedro community.

Caltrans agrees with the proposed transportation improvements and mitigation measures as outlined in Volume II, Section 4.2 of the DEIR, which consist of the following items:

- Transportation System Management (TSM) Strategies
- Transit Improvements
- Non-Motorized Transportation
- Transportation Demand Management (TDM) Strategies

Ms. Debbie Lawrence

September, 27, 2012

Page 2 of 2

- Capital Improvements
- Neighborhood Traffic Management Plans

When a State Highway has saturated flows, the use of a micro-simulation model is encouraged for the analysis (please note: the micro-simulation model must be calibrated and validated for reliable results). Other methodology for analysis may be accepted, however, Caltrans strongly encourages the lead agency and those responsible for preparing the Traffic Impact Study (TIS) to consult with Caltrans staff to confirm the necessary data and methods to be used for analyzing State facilities. Typically, the traffic analysis methodologies for the facility types indicated below are used by Caltrans.

- A. Freeway Segments – Highway Capacity Manual (HCM)
- B. Weaving Areas – Caltrans Highway Design Manual (HDM)
- C. Ramps/Ramp Junctions – HCM, operational analysis or Caltrans HDM, Caltrans Ramp Metering Guidelines
- D. Multi-Lane Highways and Two-Lane Highways – HCM, operational analysis
- E. Signalized Intersections – HCM, Highway Capacity Software, operational analysis, TRAFFIX, Synchro
- F. Unsignalized intersections – HCM, operational analysis, Caltrans Traffic Manual for signal warrants
- G. Transit – HCM, operational analysis
- H. Pedestrians and Bicycles - HCM
- I. Caltrans Criteria/Warrants – Caltrans Traffic Manual
- J. Channelization – Caltrans Guidelines for Reconstruction of Intersections

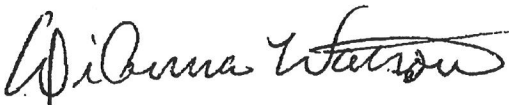
The most recent edition of the above mentioned guides and manuals should be used.

Caltrans developed a Guide for the Preparation of Traffic Impact Studies for the benefit of local agencies in preparing their traffic impact studies. The Guide can be downloaded from the Internet at:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

If you have any questions, you may reach Zeron Jefferson, Project Coordinator, at (213) 897-0219 and please refer to record number 120819/ZJ.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

CRPV1



CITY OF RANCHO PALOS VERDES

CITY MANAGER'S OFFICE  
ADMINISTRATION

6 September 2012

VIA ELECTRONIC AND U.S. MAIL

Debbie Lawrence, AICP  
City of Los Angeles  
Department of City Planning  
200 N. Spring St., Rm. 667  
Los Angeles, CA 90012

**SUBJECT: Request for Extension of the Public Comment Period for the Draft Environmental Impact Report for the San Pedro Community Plan Update (Case No. ENV-2009-1558-EIR)**

Dear <sup>DEBBIE</sup> Ms. Lawrence:

The City of Rancho Palos Verdes has appreciated the opportunity participate in the San Pedro Community Plan Update process over the past few years, including last night's meeting with the Northwest San Pedro Neighborhood Council Land Use and Planning Committee. We are currently reviewing the Draft Environmental Impact Report (DEIR), for which the 45-day public comment period is scheduled to end on 24 September 2012. However, we find that we will require additional time for our traffic engineer to review the DEIR, Mobility Element and Transportation Improvement Mitigation Program (TIMP), particularly as they relate to roadways and bikeways that link and/or intersect with those in Rancho Palos Verdes. Therefore, we respectfully request an extension of the 45-day public comment period for the DEIR for at least fifteen (15) additional days to 8 October 2012.

If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kittf@rpv.com](mailto:kittf@rpv.com).

Sincerely,

**Kit Fox, AICP**  
Senior Administrative Analyst

cc: Mayor Misetich and Rancho Palos Verdes City Council  
Carolyn Lehr, City Manager  
Carolynn Petru, Deputy City Manager  
Eduardo Schonborn, Senior Planner  
Nicole Jules, Senior Engineer

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Debbie Lawrence &lt;debbie.lawrence@lacity.org&gt;

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**Request for Time Extension (ENV-2009-1558-EIR)**

1 message

Kit Fox &lt;KitF@rpv.com&gt;

Thu, Sep 6, 2012 at 9:48 AM

To: Debbie Lawrence &lt;debbie.lawrence@lacity.org&gt;

Cc: Eduardo Schonborn &lt;EduardoS@rpv.com&gt;, Nicole Jules &lt;NicoleJ@rpv.com&gt;,Carolynn Petru &lt;Carolynn@rpv.com&gt;, Carolyn Lehr &lt;clehr@rpv.com&gt;

Hi Debbie:

It was nice to see you, Connie and Kevin last night. As I mentioned to Connie, I believe that we'll need more time for our traffic engineer to review the DEIR, TIMP and Mobility Element. Therefore, we're asking for an extension of the public comment period for the DEIR (see attachment).

Thanks!

Kit Fox, AICP

Senior Administrative Analyst

City Manager's Office

City of Rancho Palos Verdes

30940 Hawthorne Blvd.

Rancho Palos Verdes, CA 90275

T: (310) 544-5226

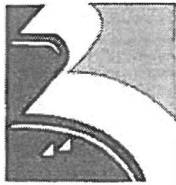
F: (310) 544-5291

E: kitf@rpv.com

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CRPV2



CITY OF RANCHO PALOS VERDES  
CITY MANAGER'S OFFICE  
ADMINISTRATION

9 October 2012

VIA ELECTRONIC & U.S. MAIL

Debbie Lawrence, AICP  
City of Los Angeles  
Department of City Planning  
200 N. Spring St., Rm. 667  
Los Angeles, CA 90012

**SUBJECT: Comments Regarding the Proposed Draft Environmental Impact Report (Case No. ENV-2009-1558-EIR) for the San Pedro Community Plan Update**

Dear Ms. <sup>DEBBIE</sup>~~Lawrence~~:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the Draft Environmental Impact Report (DEIR) for the above-mentioned project. We also appreciate that our request for a 15-day extension on the public comment period was granted. As you may recall, the City previously commented upon the scope of the DEIR for this project on 12 February 2008. We have reviewed the Notice of Completion/Availability and the DEIR, and offer the following comments:

1. The discussion of Project Implementation in the DEIR (Section 3.4) includes the description of proposed land use changes (pp. 3-12 to 3-25). Of particular interest to the City of Rancho Palos Verdes are the proposed land use designations for two (2) of the subareas identified on Figure 3-4 and in Table 3-2:
  - a. Subarea 10 is a 76.02-acre area located at the northeast corner of Gaffey Street and Westmont Drive, which includes the existing Rancho LPG (formerly AmeriGas and Petrolane) facility. The plan calls for the existing land use designations of "Heavy Manufacturing" and "Light Manufacturing" in this subarea to be replaced with a single designation of "Heavy Industrial." How will this proposed change affect future operations and limit the expansion and/or modification of the current Rancho LPG facility?
  - b. Subarea 260 is a 15.69-acre area that includes the existing commercial centers surrounding the intersection of Western Avenue and 25<sup>th</sup> Street. The plan calls for the existing land use designations of "Neighborhood Office Commercial" and "Low Residential" in this subarea to be replaced

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with a single designation of "Community Commercial." We understand that the intent of this proposed change is to encourage the re-development of this subarea into a mixed-use, pedestrian-oriented community commercial center serving the southernmost portion of the San Pedro community. The intersection of Western Avenue and 25<sup>th</sup> Street is located along one of the major transportation corridors providing access to the City of Rancho Palos Verdes (25<sup>th</sup> Street becomes Palos Verdes Drive South a mile or so to the west of this intersection). We understand that site-specific re-development proposals within this subarea would be subject to additional CEQA review in the future. However, we remain concerned that the environmental impacts of the higher density/intensity of future development envisioned in this subarea—particularly Transportation/Traffic impacts—have not been adequately addressed in the DEIR.

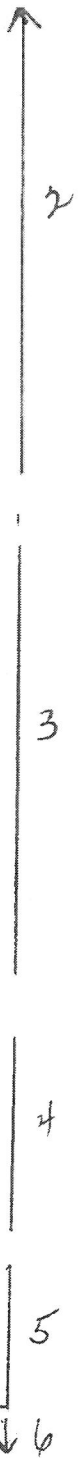
2. The discussion of Safety/Risk of Upset in the DEIR (Section 4.7. p. 4.7-6) states:

*The transport of hazardous materials through the CPA is regulated by the State Department of Transportation (Caltrans) and California Highway Patrol (CHP). The CPA is situated at the southern terminus of I-110 and adjacent to the Port of Los Angeles. There is a heightened risk of a hazardous material leak or spill in the CPA due to the volume of traffic and the nature of the materials that are be routinely transported from the Port of Los Angeles through I-110.*

Although this statement is correct, it is incomplete in that neglects to address the transportation of hazardous materials via other modes, most notably by rail. We understand that much of the transport of butane and propane at the above-mentioned Rancho LPG facility occurs by rail tank car.

Elsewhere in this section (p. 4.7-8), the DEIR notes that although oil fields may pose a hazard to nearby residences, "there are no oil wells or state-designated oil fields within the CPA." Again, although this statement is technically correct, it fails to acknowledge the presence of the Rancho LPG facility in the CPA, which stores materials that are by-products of oil refining from nearby facilities located just outside of the CPA boundary.

Based upon the foregoing comments, the City of Rancho Palos Verdes respectfully suggests that the assessment that environment impacts regarding the use, storage and transportation of hazardous materials and the creation of reasonably foreseeable upset and accident conditions are less than significant (pp. 4.7-20 to 4.7-25) should be reassessed. (Also, we note that the location of



Crestwood Street Elementary School in Rancho Palos Verdes is depicted incorrectly on Figure 4.7-2 (p. 4.7-27). ↑ 6

3. The discussion of Transportation/Traffic in the DEIR (Section 4.13, p. 4.13-27) states:

*Development proposals that involve large areas that are not expected to be fully implemented until 2030 or beyond (such as Community Plans) are not analyzed effectively by detailed intersection volume/capacity analyses. In cases such as these, roadway segment level of service analyses are sufficient as a means to determine service capacity and projected deficiencies of the roadway network in the community.*

As depicted in Table 4.13-13 (p. 4.13-42), the implementation of the proposed plan and Transportation Improvement and Mitigation Program (TIMP) results in a net increase of seven (7) roadway segments within the community plan area that will operate at Level of Service (LOS) E or F by 2030, as compared to existing traffic conditions. The DEIR identified these impacts as significant and unavoidable. Our detailed review of the TIMP and traffic modeling tables reveals that the LOS for six (6) additional segments of Western Avenue—all wholly or partially within Rancho Palos Verdes—will deteriorate to LOS E or F, as will the LOS for two (2) additional segments of 25<sup>th</sup> Street between Western Avenue and our City boundary. This amounts to one-third ( $\frac{1}{3}$ ) of the segments that will experience significantly reduced LOS (compared to existing conditions) under the proposed plan. We are concerned that these impacts may disproportionately affect the Rancho Palos Verdes residents who use these roadway segments, and question the factors that may be contributing to these impacts, including: 1

- The density assumptions modeled for the *Ponte Vista* project in the adjacent Wilmington-Harbor City community plan area, which are merely described as “moderate” in the TIMP (p. 34);
- The proposed changes in land use designations within Subarea 260 at the intersection of Western Avenue and 25<sup>th</sup> Street, as described above; and,
- The necessity to eliminate an eastbound travel lane on 25<sup>th</sup> Street to accommodate a Class II bike lane.

The DEIR offers Mitigation Measure 4.13-1 (p. 4.13-43) to address the deterioration of LOS and related metrics (i.e., VMT, VHT, average speed and weighted average V/C ratio) within the community plan area, to wit: ↓ 8

*Implement development review procedures to ensure that the applicable Mobility policies of the San Pedro Community Plan are applied and implemented by individual discretionary development projects when they are considered for approval in the plan area.*

The City of Rancho Palos Verdes respectfully suggests that this proposed mitigation measure is inadequate to address the impact of this project upon our residents, and should be augmented by additional mitigation measures and modifications to the proposed plan.

4. The discussion of Alternatives to the Proposed Plan in the DEIR (Section 6.2.3, p. 6-9) dismisses as infeasible any alternative that would reduce building heights and/or floor-area ratios (FAR) to address significant and unavoidable environmental impacts of the plan. Notwithstanding this, the City of Rancho Palos Verdes respectfully requests that the proposed plan be revised to:
- Reduce the proposed density/intensity of development to be allowed within Subarea 260; and,
  - Provide a Class II bike lane on 25<sup>th</sup> Street without eliminating an eastbound travel lane between Mermaid Drive and Western Avenue.

Again, thank you for the opportunity to comment upon the DEIR for this important project. Please note the City reserves the right to submit additional comments on the draft community plan itself at a future date. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kitf@rpv.com](mailto:kitf@rpv.com).

Sincerely,



**Kit Fox, AICP**  
Senior Administrative Analyst

cc: Mayor Misetich and Rancho Palos Verdes City Council  
Carolyn Lehr, City Manager  
Carolynn Petru, Deputy City Manager  
Eduardo Schonborn, Senior Planner  
Nicole Jules, Senior Engineer



SCAQMD



## South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

E-Mailed: October 9, 2012  
Debbie.Lawrence@lacity.org

October 9, 2012

Ms. Debbie Lawrence  
San Pedro Community Planner  
Los Angeles Department of City Planning  
200 North Spring Street, Room 667  
Los Angeles, CA 90012

### Review of the Draft Environmental Impact Report (Draft EIR) for the San Pedro Community Plan Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

The AQMD staff recognizes the potential long term regional air quality benefits from the proposed transit oriented development portion of the project that may reduce vehicle miles traveled (VMT) in the region. However, the AQMD staff is concerned that the project places new sensitive land uses<sup>1</sup> (i.e., residential land uses) adjacent to the Port of Los Angeles (POLA). The POLA is a significant source of toxic air pollutants as shown by AQMD's MATES III study. Therefore, absent substantial evidence (i.e., quantification of health risk impacts and mitigation) demonstrating that public health impacts due to the project's proximity to POLA are insignificant the lead agency should include mitigation in the Final EIR that is consistent with the CARB Land Use Handbook<sup>2</sup>.

Specifically, the lead agency should avoid the placement of new sensitive land uses or the intensification of existing sensitive land uses that are significantly impacted by the port. In the event that the final EIR demonstrates significant adverse air quality impacts the lead agency should require mitigation pursuant to Section 15092 of the California

<sup>1</sup> Sensitive land uses are land uses where sensitive individuals are most likely to spend time, including schools, schoolyards, parks, playgrounds, day care centers, nursing homes, hospitals, and residential communities.

<sup>2</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Environmental Quality Act (CEQA) Guidelines. Further, AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines additional mitigation measures are considered to minimize the project's significant construction and operational air quality impacts. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC120814-01  
Control Number



3

### Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's project description in Chapter 3 of the Draft EIR (see Figure 3-2) the proposed project includes the intensification of residential land uses along Harbor Boulevard that is adjacent to the Port of Los Angeles. Specifically, the project will increase the capacity for residential units in sub-area 135 and 175 (see figure 3-4) of the community plan. As a result, the AQMD staff is concerned about potentially significant health risk impacts from toxic air pollutants emitted by the high volume of port related activity adjacent to the proposed residences. AQMD's MATES III study determined that the cancer health risks near the port are substantially elevated compared to the rest of the air basin. While the ports have taken many steps to control emissions their significant impact on local air quality remain.<sup>3</sup> Therefore, AQMD staff recommends that the lead agency provide additional mitigation that requires the maximum possible buffer between new residential land uses and the port area. Further, the lead agency could consider other alternatives that would strategically concentrate new housing stock in areas further inland in the proposed community commercial area. In addition to considering the above mentioned mitigation measure/alternative the lead agency should revise Mitigation Measure 4.2-3 in the Final EIR to identify specific project design features that could effectively reduce potential significant health risk impacts from the project.

### Operational Emissions Mitigation

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for VOCs, PM2.5, and PM10 and exceed the GHG emissions thresholds the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

### Transportation

- Require electric car charging stations for non-residential land uses. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide electric car charging infrastructure for commercial and residential land uses beyond local requirements.
- Provide incentives to encourage public transportation and carpooling, such as park and ride lots, or dedicated shuttle service from the development to nearby transit for commuters.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- Implement a rideshare program for employees.
- Require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) upon project build-out, whenever feasible.

<sup>3</sup> <http://www.aqmd.gov/prdas/matesIII/matesIII.html>

- Provide an alternative fueling station for delivery trucks (e.g., natural gas or electric) and passenger cars.
- Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles at commercial and residential sites.

#### Other

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Provide outlets for electric and propane barbecues in residential and park areas.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters at commercial sites.
- Require use of water-based or low VOC cleaning products at commercial facilities.

#### Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds for NO<sub>x</sub>, VOC, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
  - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements,
  - Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)<sup>4</sup> have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
    - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

<sup>4</sup> For example see the Metro Green Construction Policy at:  
[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

Additional measures to reduce off-road construction equipment can be found at the following website: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).



LAC



Debbie Lawrence <debbie.lawrence@lacity.org>

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## LA Conservancy comments on the San Pedro Community Plan Update Draft EIR

1 message

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Flora Chou <fchou@laconservancy.org>

Mon, Sep 24, 2012 at 4:54 PM

To: "Debbie.Lawrence@lacity.org" <Debbie.Lawrence@lacity.org>

Cc: Adrian Fine <afine@laconservancy.org>, Ken Bernstein <ken.bernstein@lacity.org>

Debbie,

Please find attached the Los Angeles Conservancy's comment letter on the Draft EIR for the San Pedro Community Plan Update. If you have any questions, please feel free to contact me at the number before or Adrian Fine at 213-430-4203, [afine@laconservancy.org](mailto:afine@laconservancy.org).

Thanks,

Flora Chou, LEED AP

Preservation Advocate

Los Angeles Conservancy

523 West Sixth Street, Suite 826 | Los Angeles, CA 90014

(p) 213.430.4211|(fx) 213.623.3909| [fchou@laconservancy.org](mailto:fchou@laconservancy.org)

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**Membership starts at just \$40, join the Conservancy now!**

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**LAC comments on San Pedro Community Plan Draft EIR\_09.24.2012.pdf**  
57K



September 24, 2012

**Submitted by email**

Ms. Debbie Lawrence, San Pedro Community Planner  
Los Angeles Department of City Planning  
200 North Spring Street, Room 667  
Los Angeles, CA 90012  
Email: [Debbie.Lawrence@lacity.org](mailto:Debbie.Lawrence@lacity.org)

**RE: San Pedro Community Plan Update Draft EIR, ENV-2009-1558-EIR**

Dear Debbie:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the San Pedro Community Plan Update. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

The Conservancy has long been active in the San Pedro area with a past walking tour of downtown San Pedro, support of the Vinegar Hill Historic Preservation Overlay Zone (HPOZ), and advocacy efforts at Fort MacArthur and the former Nike missile sites at White Point. We are currently engaged with the Port of Los Angeles to preserve historic sites at Terminal Island directly adjacent to San Pedro. We commend the goals and policies to protect historic resources and neighborhoods as stated in the August 2012 draft of the San Pedro Community Plan (the Plan), but additional evaluation of the Plan's potential adverse impacts is needed. We also urge consistency in the policies toward historic and cultural resources among the City's community plan updates.

**I. Historic and Cultural Resources in San Pedro**

Established in 1888 as its own city, San Pedro developed from a small outpost to a growing community with the arrival of the Southern Pacific Railroad to Los Angeles in the 1870s. The importance of San Pedro's harbor increased with this link to the transcontinental rail system that allowed trade and shipping to boom. Businesses and residences developed to support these enterprises and new neighborhoods formed on the bluffs and mesas near the harbor, including the current Vinegar Hill HPOZ just south of the business district around Beacon Street.

The establishment of the Port of Los Angeles in 1907, and the incorporation of San Pedro into the City of Los Angeles in 1909, further propelled the growth of San Pedro as a port

city. Centered on shipping, fishing, and other maritime industries, San Pedro attracted immigrants from coastal communities around the world including Portuguese, Scandinavians, Greeks, Croatian, Italians, and Japanese residents. The military also had a presence in the area as early as 1908, with Fort MacArthur established at Point Fermin to defend Southern California and serving as a military installation from World War I through the Cold War.

The Draft EIR identified twenty-six designated historic resources in San Pedro, including the San Pedro Municipal Building (1928), Warner Grand Theatre (1931), and the U.S. Post Office (1936). Properties formally determined eligible for the National Register of Historic Places, such as Rancho San Pedro housing development, and several City of Los Angeles Historic-Cultural Monuments (HCMs) are also identified.

## **II. Additional clarity of the Community Plan's impacts on historic resources is required**

More potentially eligible historic resources exist in San Pedro, as identified through surveys by the former Community Redevelopment Agency of Los Angeles (CRA/LA) in its redevelopment areas, and by the City's SurveyLA efforts, which has completed the preliminary survey of San Pedro. The Draft EIR fails to include these survey results or evaluate the impact of the Plan on potential historic resources. The Final EIR should at a minimum include areas with concentrations of potential resources to assess impacts of the Plan's proposed goals and policies, and to assist with the development of appropriate planning policy, design guidelines, and sufficient staff resources for these areas. This is particularly important with the elimination of CRA/LA that resulted in the loss of the permit and design review aspects of implementing the Redevelopment Plans, which has yet to be replaced.

Additionally, the Draft EIR concludes that adoption of the Plan would result in less than significant impacts to historic resources. However, several factors with the potential to impact historic resources have not been addressed in the Plan or evaluated in the EIR. For instance, the opportunity areas identified for new residential development are sites with or adjacent to historic resources. Among these are the Rancho San Pedro housing project owned by the Housing Authority of the City of Los Angeles, the Fort MacArthur Upper and Middle Reservations, which include National Register-listed buildings and a historic district, and the Ponte Vista area outside of the plan area, but which includes the National Register-eligible Defense Fuel Supply Point Historic District reflecting the Navy's presence in San Pedro. The Plan does not mention or prioritize the historic status of these resources in the opportunity discussions. The Final EIR should consider whether projects at these and other opportunity areas will adversely impact historic resource and propose additional policies or mitigation measures to avoid any impacts.

Also, it appears that the zoning in the Regional Center and Commercial Center areas of downtown San Pedro may remain incompatible with scale of the identified historic resources, despite proposed limits on heights and an existing design overlay. The summary of proposed draft changes mentions consideration of a Transfer of



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Development Rights (TFAR) program to protect historic resources in downtown San Pedro, though neither the Plan nor the Draft EIR reference such a program. A TFAR program can be an excellent tool to protect historic resources if the transfers are linked to the protection and maintenance of the historic resources.

**III. Consistency among community plan updates' approach toward historic and cultural resources is needed**

The San Pedro Community Plan is the second community plan to be updated, following the adoption of the Hollywood Community Plan update in 2012. While the San Pedro update contains several direct and indirect efforts to protect historic resources, including encouraging adaptive reuse of bungalow and courtyard housing under small lot development, specific policies included in the Hollywood update are missing from this Plan. Similarly, the West Adams-Baldwin Hills-Leimert Park Community Plan update currently in environmental review proposes a different set of policies for that area. To reduce confusion and ensure a consistent approach across the plan areas, we recommend establishing a set of baseline policies toward historic and cultural resources, with additional provisions tailored to the unique conditions and priorities in each area. Such policies could include among others:

- Compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for historically sensitive properties.
- Encourage sensitive and/or adaptive reuse of historic building.
- Ensure compliance with the California Environmental Quality Act (CEQA) for projects that impact designated and potential historic resources.
- Incorporating development and preservation with smart growth and sustainability principles. The reinvestment, reuse and "greening" of the existing building stock are fundamental to sustainable development that can improve energy efficiency, reduce carbon usage, and be employed to combat climate change.

Thank you for the opportunity to comment on the Draft EIR for the San Pedro Community Plan Update. Please feel free to contact me at 213-430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

cc: San Pedro Bay Historical Society  
Councilmember Joe Buscaino, CD 15  
Office of Historic Resources, City of Los Angeles

CACSP

August 28, 2012

Debbie Lawrence, AICP  
City of Los Angeles Department of City Planning  
Policy Planning & Historic resources Division  
200 N. Sprint Street, Room 667  
Los Angeles, CA 90012

Re: Comments on the August, 2012 Draft Report of the San Pedro Community Plan

Dear Ms. Lawrence,

I was most impressed with the San Pedro history sections in the August 2012 Draft version of the San Pedro Community Plan. As president of the Croatian-American club, I was happy to read on Page 51 recognition of the importance of the Croatian community and the existence of the Croatian-American Club located on 9<sup>th</sup> Street. Just to note, I recently read an article from Wikipedia which stated that there are reportedly more than 35,000 people of Croatian decent that live in San Pedro, making it the biggest Croatian community on the Pacific Coast.

Although we sincerely appreciate your acknowledgements of our heritage, we must point out that there are archaic and somewhat offensive terms within this Draft report that are used to describe San Pedro's Croatian community. What once may have been acceptable is no longer. As such, we respectfully have two requests for modification to the Draft report:

1. On Page 1, the 2<sup>nd</sup> paragraph, sentence 1 is written as, "The climate, combined with the maritime and port-related industries located at the harbor, have historically helped to shape the San Pedro community, attracting working-class immigrants from other regions with strong seafaring ties, including, most notably, Italy and the former Yugoslavia." Please replace the words "former Yugoslavia" with "Croatia." The immigrants from the former Yugoslavia that San Pedro's seaside attracted came almost entirely from Croatia and it is much more accurate to attribute Croatia than the former Yugoslavia when describing them.
2. Page 18, the 1<sup>st</sup> paragraph is written as, "...industry in San Pedro as well as seafarers and fisherman from Europe's Dalmatia region." Please replace "Europe's Dalmatia region" with "Croatia's Dalmatian coastal region." And, "San Pedro became a melting pot of Italians, Portuguese, Serbo-Croatian, ...." Please replace "Serbo-Croatian" with "Croatian." Croatians are proud to be a part of the melting pot of San Pedro, but we are Croatian, not Serbo-Croatian. Just like the Serbs that have populated the San Gabriel area of Southern California would not wish to be referred to as Serbo-Croatian, we also respectfully ask to be accurately described.

Thank you for you kind consideration in this matter.

Sincerely,

  
Joe Ivcevic  
President

Croatian American Club of San Pedro



~~NWSPNC~~  
NWSPNC

## Northwest San Pedro Neighborhood Council

"Your Community Voice"

October 8, 2012

City of Los Angeles Department of City Planning  
ATTN: Debbie Lawrence  
200 North Spring Street, Room 667  
Los Angeles, CA 90012  
Debbie.Lawrence@lacity.org

**Diana Nave**  
President

**George Thompson**  
Vice President

**Scott Allman**  
Treasurer

**Katie Marrie**  
Secretary

### COMMENTS ON DRAFT SAN PEDRO COMMUNITY PLAN AND DRAFT EIR

Attached are our comments on the Draft Plan and EIR for the San Pedro Community Plan. This has been a multi-year project and our Planning and Land Use Committee participated in several meetings with Debbie Lawrence and Conni Pallini-Tipton. We appreciate all of the time, effort, and thought they put into this process. The draft Plan contains many good ideas and policies to guide development and assist in improving our community. The DEIR is an extensive document, and we have spent considerable time on our comments. We believe these comments will improve the plan and the long-term results for our community.

We want to thank the Department for extending the time for comment on the DEIR. Without that extension our Board would not have been able to consider and adopt these comments.

We reserve the right to submit additional comments on the Plan and DEIR, particularly in light of the fact that we have not yet received the implementation section.

Thank you for your consideration of our comments. Feel free to contact me if you have any questions.

Diana Nave, President  
Northwest San Pedro Neighborhood Council

Cc: Joe Buscaino, Alison Becker

## DEIR COMMENTS

### GENERAL COMMENTS APPLICABLE TO MULTIPLE SECTIONS

#### **A. The DEIR uses 2005 SCAG interpolated population data rather than actual 2010 census data.**

The DEIR justifies using 2005 data because the Notice of Preparation was in 2006. However, the 2005 data is interpolated (a guess) and the 2010 Census data that is based on an actual door to door count.

According to the 2005 SCAG estimate there were 82,112 people residing in the Plan area. The population capacity in the plan update is 83,354, or an increase of 1.5%. However, if the 2010 census count of 76,651 persons is used, the planned for growth is really 8.7%. This is an important difference, worth getting right!

Since potential impacts are calculated on a pro rata basis, the use of the 2005 data results in fewer potential impacts than if the 2010 data are used. This error means that the impacts on traffic, services, utilities, schools, air quality, noise, etc. are substantially understated.

We request that the 2010 census data be used. We note that the Hollywood Community Plan Final EIR was revised based on the 2010 Census Data. In addition, the Port of Los Angeles has recently re-circulated the Draft EIR for the Southern California International Gateway (SCIG) Project because, as they stated:

"The Draft EIR included a 2005 baseline year for the analysis. The LAHD recognizes that 2005 is no longer an appropriate baseline to use and has revised the analysis using 2010 as the new baseline....2010 data and updated air quality models are incorporated....This includes, but is not limited to, 2010 census data, updated air quality models and emission factors, new traffic counts at study intersections, new noise measurements at selected noise sensitive receiver locations, and updated on-site operational activity...."

#### **B. Neither the Plan nor the DEIR provide space for needed public facilities**

The data show that additional library, parks, and schools and/or school space will be needed. Nowhere does the update or DEIR mention these facilities or provide a potential location for them.

**C. The data excludes SB 1818 potential unit [and resultant population] increases.**

The DEIR reports that 60% of housing in the Plan area is multi-family housing.

None of the traffic impacts [and many other impacts] take into account the density bonuses available as a matter of right to any owner of multi-family property. If property owners made use of the maximum density bonuses available as a matter of right, there would be more than 100,000 residents in the Plan area.

We understand that so far perhaps only 2% of owners have taken advantage of SB1818. However, those development rights exist now and in the future. It cannot be said with certainty what the future will bring, but we know now what the development rights are. Any assessment of the environmental impacts of the Plan update needs to consider those development possibilities.

**D. The City has failed to complete an infrastructure capacity analysis that will provide better information for the plan.**

The city needs to complete the long overdue Infrastructure Needs Assessment and base the DEIR on the actual status of our infrastructure capacity. When completed this information should be issued as an addendum to the plan.

**E. The DEIR does not adequately address the impacts being created by port expansion.**

The Port expansion will have significant effects in San Pedro, particularly in terms of traffic. As one example, if the port grows to accommodate 5 cruise ships a day, this would bring up to 40,000 visitors in a day. This cannot be ignored. These traffic increases would impact Harbor Blvd., 22<sup>nd</sup> Street, and Miner St.

**F. The failure of the DEIR to include all of San Pedro makes it nearly impossible to evaluate the environmental impacts of the proposed project.**

In addition to the exclusion of the Port, the area between Capitol Drive and Palos Verdes North, although considered part of San Pedro, is contained in the Harbor-City Wilmington Plan. Changes that have occurred or are occurring in that portion of San Pedro will have significant impacts on the CPA. The area includes the 61 acre vacant parcel currently known as Ponte Vista, the Defense Fuel Support Point with the capacity to store 1.5 million barrels of petroleum products, the Phillips 66 Oil Refinery, the Regional Headquarters for Department of Recreation and Parks, Marymount College (planned for expansion from residence halls to full campus with 800 resident students and 700 commuter students), the future Volunteers of America Navy Village housing, and Rolling Hills Prep School. We again request that this part of San Pedro be included in the San Pedro Community Plan.

**G. There should be a policy of pro rata use of infrastructure capacity.**

Any development requiring discretionary approvals should be limited to a pro rata portion of available infrastructure capacity. For example, a single development that uses all of the available traffic capacity of Western Avenue would render revised zoning for all other developable parcels meaningless.

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The following specific comments follow the numbering format in the DEIR and should also be incorporated into the Draft Plan if applicable:

9

**Section 3.4 Plan Policies**

3.1.1 ADD First Street as a primary street. Although not designed as such, it is one of the major through routes connecting west San Pedro and Rancho Palos Verdes to Gaffey Street, the 110 Freeway, downtown San Pedro, and the Port.

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3.1.2 Paragraph 1. CHANGE the second sentence to be accurate and consistent with the language in the draft plan: "... Single-family residential is primarily located in the southern, northern and western portions of the community, while multi-family residential is concentrated in the central and eastern portions."

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3.1.2 Paragraph 2 CORRECT: Peck Park is not in the southern & coastal area of the CPA, it is in the northwest portion. In the last sentence in that paragraph, the reference to the military reservation needs to indicate that it is military **housing**.

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3.1.2 Paragraph 3 - ADD Crafted, City Dock 1, USS Iowa, and the Cruise berth at Kaiser Point (important because they all have planning implications).

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3.1.2 ADD a new paragraph regarding Ponte Vista – "This area is currently zoned for open space and R-1. Several builders have proposed higher density. Although it is technically outside of the Project Area it is part of San Pedro and whatever is built there will have significant impacts on the CPA."

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Table 3-1 page 3-9 in the EIR and table 2-2 in the Plan (p24) CORRECT: These tables should be consistent and based on 2010 census data: Table 2-2 shows a growth in population of just over 1100 people and a growth in dwelling units of around 5,000, NOT including Ponte Vista. This makes no sense. Table 2-2 uses 2005 SCAG estimates and 2030 projections. SCAG population figures are more than 6,000 higher than 2010 Census figures; in effect, the real population growth planned for in the CPA Update is 7,000, not 1,000. Failure to include Ponte Vista further skews the analysis.

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Further, Table 3-9 uses current plan capacity and projected plan capacity that shows an increase of about 1200 people and slightly over 1,000 housing units. Why are the two tables using different data? In both cases it appears that 2005 SCAG guesses were used, which are substantially different from 2010 Census data.

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Finally, the new SCAG estimate for 2035 should be used rather than the old 2030 estimate.

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#### Chapter 4: Environmental Analysis

P 4-6, Table 4-1, Cumulative Projects. ADD:

- a. VOA Navy Village
- b. Marymount College Expansion (Palos Verdes Drive North & Waterfront Campus)
- c. Harbor Highlands (N. Gaffey at Gatun) – under construction
- d. Sanitation District Outfall Project – in EIR process
- e. Rolling Hills Prep Build out (Palos Verdes Drive North)
- f. Port Master Plan Update
- g. USS Iowa - Approved
- h. Ports O' Call re-development – out to bid
- i. Cabrillo Marina Phase II - constructed
- j. Wilmington Industrial Park expansion
- k. New Cruise Terminal at Kaiser Point
- l. Crafted at the Port – partially operational
- m. Widening of 110/47 transition
- n. Other projects entitled but not built

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DELETE Jordan Downs; it should not be included in this list.

#### 4.1 Aesthetics

4.1.1 Downtown San Pedro is not the only shopping area. One of San Pedro's specific challenges is that we have two distinctly separate shopping areas and they are opposites in terms of their character, history and as urban planning models. The downtown San Pedro "node" is the historic and nostalgic commercial heart whereas Western Avenue at 25<sup>th</sup> and Western and then Western from Summerland to the

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cemetery is a linear thoroughfare and connector/divider (San Pedro to Palos Verdes) with a series of strip malls. Western Avenue is not primarily a destination but a stopover and conduit to the freeway for many in PV and San Pedro. The node is a vestige of a downtown and the 'big box' stores that could have attached themselves to the periphery of downtown and added/drawn vitality to it have been located on North Gaffey that further fragmented San Pedro.

4.1-2 Paragraph 1. Third sentence REPLACE "the south central and southeastern portion" with the word "much." Views of the Harbor/Port exist throughout the CPA and are not limited to the two portions mentioned.

4.1-2 Paragraph 3. CORRECT: The first sentence is misleading. Between Gaffey and Western Ave from 25<sup>th</sup> Street to 7<sup>th</sup> St. there is a very high concentration of single-family residences. In fact, the homes in the Vista del Oro area often range from those built in the 1920's to the 40's. This is San Pedro's oldest continuous densely lived-in/historic SFR area. The head of Landmarks in LA recently toured this area and found it to be viable for HPOZ status. The Vinegar Hill portion (36<sup>th</sup> to 26<sup>th</sup> Streets between Gaffey and Pacific has older small single-family homes on small lots. The northern and westernmost portions contain predominately newer single-family homes on standard lots.

Page 4.1-3, Open Space Areas.

ADD Welcome Park, 22<sup>nd</sup> St Park, N. Gaffey Green Belt, Bandini Canyon, the Waterfront Promenade and Knoll Hill, with an explanation that, with the exception of Bandini Canyon and the Welcome Park, these open space areas are owned by the Port of Los Angeles.

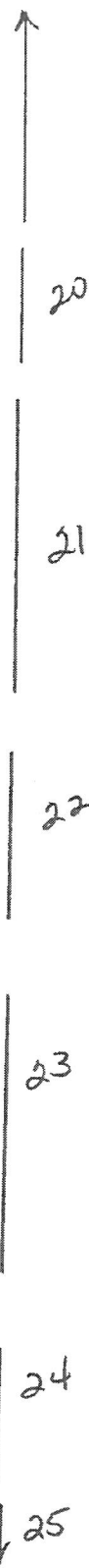
Page 4.1-3, Scenic Vistas

ADD Peck Park Canyon, Plaza Park, Averill Park Palm Tree Promenade, Point Fermin Park, Royal Palms, Gaffey Street Lookout, and Knoll Hill to the list of Scenic Vistas. In addition, Vista del Oro has panoramic views of the LA Basin, mountains, harbor, Vincent Thomas bridge, lighthouse, Pacific Ocean and the coastline to Dana Point. Although they are outside of the San Pedro Specific Plan area, these are significant view areas and should be included in the discussion. Most of these should also be included in Open Space Areas.

Page 4.1-4, Scenic Trails

ADD Peck Park Canyon trails, Bandini Canyon, the Gaffey Green Belt, and the California Coastal Trail, in list of trails. Although they are outside of the San Pedro Specific Plan area, these are significant trails and should be included in the discussion.

Page 4.1-4, Scenic Roadways





- **Western Avenue** - EXPAND to read "from Paseo del Mar to 9<sup>th</sup> St".
- **Paseo del Mar** ADD reference to landslide closing a portion of this thoroughfare. This road closure will have more impact on the community than most of the other changes foreseen in the plan. It needs to be acknowledged.
- ADD a new paragraph, to read: "In addition, the following are also scenic roads: Harbor Blvd with its views of the Port, 22 St., Dodson St., and Anchovy"



Page 4.1-4 and -5 Scenic Resources

ADD Gateway Fountains & Promenade, Knoll Hill, USS IOWA, and Gaffey Green Belt with its planned extension along Pacific, Front, and Harbor Blvd. to the Vincent Thomas Bridge where it will join the Promenade, Averill Park (designed by Fredric Law Olmstead), Friendship Park, The Warner Grand Theater, The Red Car Line, The Angel's Gate Lighthouse, and the Cabrillo Beach Bathhouse.

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4.1-5 Light & Glare

The Port of LA is the major contributor to light pollution and further expansion or infill of the waters of our port will add to this loss of our night sky and the dark water that reflects that sky.

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Table 4.1-6, proposed Plan Policies:

- Policy LU7.5 ADD "or in single family residential neighborhoods"
- ADD a policy that shade trees must be incorporated into all surface parking areas and walkways with trimming guidelines that observe/respect birds' nesting season
- ADD a policy to connect existing trails to each other and to the California Coastal trail
- ADD a policy to connect bike paths and promote bicycling
- ADD a policy to require "dark sky" lighting techniques to minimize light pollution
- ADD a policy that allows pro rata use of available infrastructure capacity.

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Impact 4.1-2 (pages 4.1-23 to 24) discusses the proposed increase in building heights along Western Avenue at 25<sup>th</sup> Street and indicates "...the proposed plan and implementing ordinances could impact scenic resources within locally recognized scenic roadways." It goes on to say that "this would be a significant and unavoidable impact." We agree that such development could have a significant impact on the surrounding views, however it can and should be avoided by not adopting the proposed change.

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## 4.2 Air Quality

1. CORRECT: The Port of Los Angeles is excluded from the CPA. By excluding it, the amount of pollution to be included in the report affecting San Pedro, is omitted. This should be corrected to include the Port of LA, due to its proximity to San Pedro and because the Port includes data on impacts in San Pedro from its projects. It is unclear if all of the anticipated traffic impacts of the port development have been included. For example, if the port grows to 5 cruise ships, this will bring in 40,000 visitors a day and we must plan for this. The number of cars and busses bringing in people in one day for the cruise ships alone is huge. Even if all of these visitors arrived by bus, and each bus carried 50 people that is 800 buses. This is in addition to the pollution from the cruise ships themselves, which are the largest contributor to such pollution.

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2. CORRECT: The DEIR uses air quality data from a station in Long Beach. However, the Port has an air collecting station on Harbor Blvd at 3rd St. with several years of air quality data on the Port's website. They currently monitor emission levels of ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, two sizes of particulate matter (PM10 or coarse particles, and PM2.5 or fine particles), polycyclic aromatic hydrocarbons (PAHs), and ultrafine particles. The Port data should be used in addition to or instead of the Long Beach data.

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3. ADD: In addition to the effects of the Port on air quality, two other major installations have an impact: Rancho Holdings, which stores butane and propane on North Gaffey street, very near schools and homes and Phillips, 66 a large oil refinery, located adjacent to San Pedro. These facilities release a number of "flares" (burn offs), which spew hazardous particulates into the air having an adverse impact on air quality. On 9/15/12 Phillips 66 Oil Refinery, lost power and had to immediately shut down their operations and "flare" (burn off) all the "product" in their lines. This is not the first time this happened. Also, in restarting the system from total shutoff at the refinery, a "gas" smell emanating through the neighborhood, which added to the poor air quality.

32

4. CORRECT: With the increase of residences anticipated with the Highlands and Ponte Vista developments, the amount of air pollution will be increased with vehicular CO2. The reports states that San Pedro can expect only about 1,250 more residents by 2030,. That figure grossly underestimates the real population growth since it is based on the 2005 estimate rather than the 2010 census. In addition it does not include the anticipated increase in residents that will result from the development of Ponte Vista.

33

5. CORRECT: With the arrival of the Iowa, the opening of the Crafted in San Pedro, the planned cruise terminal at Kaiser Point, and the numerous other events now being held at the Port of Los Angeles along the San Pedro Harbor, in addition to the great number of residences being built in San Pedro. This greatly increases the amount of traffic, thus increasing the amount of CO2 in the air. The proposed

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mitigations are inadequate.

6. COMMENT: The DEIR report suggested more residents go "green" in the purchase and installation of solar roofs. Many residents in San Pedro could never afford the purchase and maintenance of solar roofs and many residences are rentals.

7. Stats on p 4.2-25 CORRECT to 2010 census data.

8. The 110/47 interchange is being widened. Was the increased usage included in the analysis on the air quality? If not, ADD

9. ADD a policy to require any large development to include alternate energy.

10. ADD: The proposed mitigations are inadequate and need to be strengthened.

#### 4.3 Biological Resources

ADD a policy to survey the four locations for the Palos Verdes Blue butterfly (*Glaucopsyche lygdamus palosverdesensis*) identified in Figure 4.3-2 at Harbor Highland Park, Point Fermin Park, White Park, Deanne Dana Friendship Community Regional Park / Bogdanovich Recreation Center for the following PV Blue food source plants: (a) California Buckwheat (*Eriogonum fasciculatum*); (b) Santa Barbara Milk Vetch (*Astragalus trichopodus*); and (c) California Broom / Deerweed (*Lotus scoparius*). If these food source plants are located, undertake all reasonable efforts to ensure their continued survival, and if necessary, introduce additional plants. This strategy has proven successful for the re-establishment of the PV Blue Butterfly in El Segundo at LAX recently.

#### 4.4 Cultural Resources

Table 4.4-1 ADD Banning's Landing, Timm's Landing, Muller House, Timm's House (19<sup>th</sup> St), and Averill Park (designed by Olmsted), Add the explanation (Hyde House/Dana's Revine) after Casa de San Pedro, Add address for American Trona Corp (#8), ADD "YMCA" after Harbor View House (# 20) DELETE "Juarez Theater" from #7.

Table 4.4-3 ADD a policy to prepare a study of all of San Pedro's monuments, places and buildings of significance

#### 4.5 Geology/soils and mineral resources

#### 4.6 Greenhouse Gas Emissions

#### 4.7 Safety/Risk of Upset

Figure 4.7-1, Methane Zones - ADD a mitigation to conduct a full

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characterization/quantification of methane emissions and emission rates in the identified zones. These zones are upsetting, particularly the massive zone at the northeast end of San Pedro.

One of our members suggests the following: This exercise should be conducted by LA EAD staff or by certified contractor using a methane meter or a portable GC/FID instrument. Once this has been completed, a decision should be made as to whether to utilize this methane resource for either co-generation by collection, dewatering, and combustion to produce steam or steam/energy as done at the LA Co. Sanitation District landfills. For the smaller methane spots, co-located at Pt. Fermin Park, White Park, and Deanne Dana Friendship / Bogdanovich Recreation Center, the collected methane emissions could feasibly be used for hot water heating or other beneficial end-use applications. The City is under an obligation via AB32 for a reduction of Green House Gas emissions to 1990 levels and this characterization/quantification would be a step in this direction.

ADD: The DEIR does not consider and therefore does not address the potential health impact or catastrophic loss due to problems developing in the methane zones. An educational outreach should be done to help the community understand the potential impact of methane.

Page 4.7-8, Aviation Hazards – ADD: government (e.g. military, police, sheriff) and news helicopters are frequently over the area. The area is also on the flight path for training and testing by Robinson’s Helicopters, located adjacent to the Zamperini Field Airport in Torrance.

Page 4.7.10 Emergency Response – ADD: The number of Police (LAPD) and Fire (LAFD) personnel are at a dangerous low. If San Pedro were to experience a disaster, whether it be an earthquake or other disaster, those LAPD officers would be assisting the LAFD firefighters in putting out fires and securing our local refineries, and other buildings/areas, where hazardous materials are stored. The LAFD has told residents that they will have to fend for themselves for at least a week, and up to three or four weeks.

ADD: Discussion of evacuation routes in case of a disaster. Most likely the LAPD and LAFD would not be able to help with any evacuation, as they will be busy putting out fires. If any escape needed to be made because of a fire on the peninsula, there would utter chaos and, the evacuation itself would be a disaster.

San Pedro has really only three viable avenues of escape. 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.

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The second principal evacuation route is the 110 Freeway. The City has indicated that in an emergency, this might be turned into a southbound bound 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 use Western Avenue for evacuation. Western Ave. is already clogged during peak hours. It cannot function as an adequate, viable evacuation route.

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The LA City Comptroller Wendy Greuel said in her 2012 report that the Salvation Army and the Red Cross are not prepared to handle an evacuation of the City of LA. 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.

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Table 4.7-4

- o Policy M7.6 ADD "and inform the public." We understand that the LAPD has such a plan but no information has been made available to the community.
- o ADD a new policy "Emergency preparedness. Coordinate response plans with Little Company of Mary, Red Cross, Salvation Army and other appropriate entities."
- o ADD a new policy "Emergency preparedness. Develop plans and educate the community regarding preparations to shelter in place.
- o ADD a new policy to require all developments over 5 units to maintain sufficient emergency supplies for their residents for at least seven days.
- o ADD a policy to require all developments over 5 units to submit an evacuation plan as part of their plan approvals after consultation with LAFD and LAPD and post this plan in every unit.

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#### 4.8 Water Quality

#### 4.9 Land Use/Planning

Table 4.9-1

Subarea 10: CHANGE: proposed designation to light industrial. The Planning Department previously indicated that this could be done.

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Subarea 200: The McCowans's site needs to be treated differently than the others sites in the sub-area. Single-family homes have been constructed on the sites, and the commercial zoning is a significant impediment to obtaining financing for the homeowners. Additionally, it is highly unlikely that the new homes would be demolished for a neighborhood commercial use during the lifetime of the Plan.

54

Subarea 260: 75' height limit at 25<sup>th</sup> and Western is the idea of DCP, not the idea or request from the community. A 40' height limit should accommodate most commercial development. Prohibit building heights that would block the views from homes or Western Avenue.



#### 4.9.1 Environmental Setting

First paragraph, last sentence, CHANGE to read "The CPA is generally bounded by Westmont (rather than Taper) on the north."

55

Fourth Paragraph (top of page 4.9-2) ADD: the industrial uses include a butane/propane tank farm, major distribution center and adjoining refinery.

56

#### 4.10 Noise

4.10.1, page 4.10-4 Existing Environmental Noise Levels. First paragraph. MODIFY Last sentence to say, portions of the CPA experience high levels of noise from the railroad and port operations, particularly at night. ADD: The data from the Noise Study conducted by the Port of Los Angeles in 2006 as it relates to San Pedro.

57

#### 4.11 Population, Housing, and Employment:

UPDATE to include the 2010 census data.

58

4.11.1 Population - CORRECT second paragraph based on 2010 census to show that the population between 1990 and 2010 increased by XXX% and that the City of Los Angeles increased by xx% during this same time. Last sentence should say the population appears to be growing at a lower rate. DELETE the reference to 'comparable'.

59

The difference between the 1990 census (74,176) and the 2010 census (76,651) is 2,475 people or 3.3%. If you look at the difference between the 2000 and 2010 census, it is an increase of only 473 individuals over the 10-year period, less than one percent (0.6%). This is very different from the SCAG estimate of a 10.7% change from 1990-2005.

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Tables 4.11-1, 4.11-2, and 4.11-3 USE 2010 census data: The SCAG's overestimate in population also calls into question their estimate of dwelling units.

61

Page 4.11-3 Employment. CHANGE: The addition of 5,767 new jobs to the existing 13,307 jobs, a 44% increase in local employment is not credible and cannot be justified, even with waterfront development, port expansion, and the redevelopment of downtown. There is no basis for projecting that jobs in San Pedro Community Plan Area will increase so much faster than Los Angeles as a whole, which is projected to increase by 11.1%. Use a more realistic figure.

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#### 4.12 Public Services & Recreation

##### Fire

Table 4.12-1 CHANGE: This table is inaccurate due to recent reductions in staffing levels at Fire Stations. Of particular concern to our community is that the LAFD Station #48 is no longer staffed with a Hazardous Materials Squad, even though 67% of the hazmat dangers are in the port area. Depending on the time of day, weather conditions, and other traffic variables it could now take 1 to 1 ½ hours for the HAZMAT team to reach San Pedro, well beyond the accepted response time of 5 minutes.

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Page 4.12-5 ADD: indicates that the LAFD "response times from all land-based stations are in excess of five minutes" In light of this, additional mitigation measures are needed to reduce the response time.

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Table 4.12-5

- o ADD a Policy to restore the staffing for the LAFD HAZMAT Unit to San Pedro.

66

##### Police

Table 4.12-6 UPDATE to the latest available information. Among other things, the real population projected increase of almost 10%, not 1%. This means the number of needed officers is also under-counted.

67

Table 4.12-8 ADD a policy to fully staff the jail at the Harbor Division. A new building was recently built for LAPD, but use of the jail was suspended. LAPD has to transport arrestees to a jail outside of San Pedro. This takes several hours away from other patrol duties, reduces availability to respond to other incidents, and adds to already unacceptably high traffic on the 110 Freeway.

68

##### Schools

- o Second paragraph, CORRECT: LAUSD no longer has a District 8
- o ADD: LAUSD also operates a number of special schools in the CPA. These include Willenberg (Harlan Shoemaker & Bess Akerson) Special Education Center, San Pedro Skills Center, San Pedro Adult School, and the William Johnston Community Day School (formerly Cooper). In addition, Marymount College has recently opened their waterfront campus in downtown San Pedro and has plans to expand their facility on Palos Verdes North, which currently serves as a dormitory, into a full four-year campus.

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Table 4.12-9:

- o CORRECT: The Harbor Math/Science Magnet at Park Western Elementary is an elementary school and its capacity is incorrect. 700 is most likely the capacity for Park Western Elementary and the Magnet combined. 11
  
- o DELETE and CORRECT: Hawaiian Elementary, Wilmington Middle School, and Banning High School. According to LAUSD, these schools do not serve San Pedro and including them is misleading. Deducting these schools and moving the Harbor Math Science Magnet to the elementary school grouping results in a current enrollment of 6061 elementary, 3,763 middle school, and 4,486 high school students, for a total of 14,310 students. Making these same changes for capacity we arrive at the following figures: 6,609 elementary, 4,208 middle school, and 4,506 high school students (we excluded Angel's gate from this figure since the goal would be to have no increase in the number of students needing to attend this special school). 12
  
- o ADD: San Pedro High School, John and Muriel Olguin Annex; while this school increases the capacity, it also reduces the capacity at San Pedro High School. 13

Table 4.12-10 ADD: Christ Lutheran, 28850 S. Western and Rolling Hills Prep 14

Impact 4.12-3 ADD: The DEIR fails to include any development at the Ponte Vista site on Western Avenue. Using the 0.4 students/dwelling unit formula, a development of 1200 units would produce another 480 students. This is in addition to the 54 students that can be anticipated in the nearby Harbor Highlands project now under construction, bringing the grand total to 2,474, an increase of approximately 17.3% rather than the 9.4% indicated. 15

The statement that "...multiple elementary schools in the CPA are operating below capacity and would be able to accommodate the elementary school aged students generated from new residential development" is not sustainable once the data is corrected. Using the same formula used in the DEIR to distribute them by school, this would be 1257 additional elementary, 631 middle school, and 611 high school students. Given that the difference between the existing students and capacity is currently 584 elementary students, there will clearly be a need for at least one additional elementary school. The impacts of this must be evaluated in the EIR. These figures do not include the impact of severe under-reporting of planned-for population that means that the student population increase is significantly underreported even more than totaled above. 16

Likewise the statement that "high school students could be accommodated at the new John M. and Muriel Olguin Campus... is incorrect. This facility was built to relieve the existing overcrowding at the main San Pedro High School campus where existing bungalows will be demolished, thus reducing its capacity to accommodate anticipated growth. 11



MM4.12-1 is inadequate. We understand that State law proclaims that the mandated school fees paid by developers satisfies CEQA, but it is knowingly inadequate, being set at perhaps 20% of actual costs. That however, binds and excuses only the developer. It does not relieve the city of its duty under CEQA to address the actual impact in the DEIR.

78

Libraries

ADD: State of California Library standard requires 0.5 sq ft of library per resident. For 82,112 residents, there should be 41,056 sq ft of library space, or 21,056 more sq ft than the existing library. A new west San Pedro library of 14.5K sq ft, would bring space to 34,500 sq ft, and 0.43 sq ft per resident. The plan should acknowledge that this would still be insufficient to meet the State Library Standard.

79

CHANGE: The DEIR is correct when it says ..."it cannot be assumed that these potential new library facilities would be constructed in the CPA in the foreseeable future." It is incorrect, however, to assume that this impact is less than significant given the statement that "The available public library services in the ...CPA...are currently inadequate to meet existing demands from the community's residents based on state library standards." We must assume that some additional library space will be added during the life of this plan, therefore there may be a significant impact.

80

ADD a policy to "Study library needs in San Pedro to determine patterns of usage and needs in light of the prevalence of electronic books and develop an appropriate plan for rehabilitation, expansion, and or building of an additional library."

81

ADD: A site for a new or expanded library should be provided in the CP update.

82

Parks/Recreation

Regional Facilities - ADD: Cabrillo Beach

83

ADD: A new Section discussing the role of the Port in providing recreation and open space facilities.

84

Table 4.12-16

Make the following changes:

- o Anderson - CORRECT Features to read Auditorium/senior Center, small children's play area - please check we do not believe that the remaining listed amenities are correct
- o Daniels Field - CORRECT: please check, we do not believe that there are baseball diamonds nor a seasonal pool
- o Deane Dana - DELETE: natural history museum - this is a repeat of the Nature Center already more appropriately listed

85

- Field of Dreams – CHANGE “ballfields” to “soccer fields”
- Harbor Highlands, - CHANGE “baseball” to “softball” & one basketball court
- Joan Milke Flores – ADD picnic tables
- Peck Park, ADD tennis courts, hiking trails, indoor and outdoor basketball courts, children’s play area, horseshoe pits
- Point Fermin DELETE: BBQ pits (check on this one)
- ADD: Welcome Park

ADD: A New Section or a New Chart for Port Open Space Facilities including

- Knoll Hill, baseball
- 22<sup>nd</sup> St Park – open fields, picnic tables
- N. Gaffey Green Belt – picnic tables, multi-purpose path
- Promenade - bicycle and walking paths, game tables

Page 4.12-22 Public recreation plan, last sentence, ADD: while the CPA as a whole exceeds the standards for neighborhood and community parks, the densest portion of the CPA with the lowest income (generally the northeast section) lacks such facilities, particularly play equipment for young children.

Table 4.12-19

- Policy CF5.1 INSERT“ ...and paper streets” after “flood control channel”
- Policy Cf5.8 DELETE “regional” This should apply to all parks
- Policy CF 5.9 ADD: “skate board paths/routes”

#### 4.13 Transportation/Traffic REWRITE

The principal issues with the traffic study relate to problems stemming from the inaccurate data used. Some of these issues affect a number of areas of the DEIR, including utility capacity, services such as fire and police, and school capacity, libraries, etc.

Among other things, the issues include:

- Traffic projections appear to be based on a pro rata increase over the improper 2005 numbers rather than the 2010 census data.
- Traffic in the DEIR is based on actual counts but is attributed to a false number of residents. Given the relatively low percentage of jobs per household, showing that we are a commuter community, and the VMT and VMH numbers, applying a multiplier based on the 83,354/82,212 population ratios results in substantially lower impact numbers than a ratio based on 83,354/76,651. In fact, if this is accurate, the estimate of unavoidably impacted intersections is likely much higher than 39.

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- There is little to justify the application of "transportation corridor" policies to San Pedro. To get to employment or shopping centers from any San Pedro location usually requires several transfers. This is not the easy access foreseen by transportation corridor policies. | 91
- It is very unclear how, if at all, Ponte Vista future development is included in the traffic impacts. | 92
- The traffic pattern data excludes the impact of the slide area on Paseo Del Mar. This should be included. | 93
- It is unclear if all of the anticipated traffic impacts of the port development have been included. These will have a tremendous impact and need to be included in the plan. | 94

ADD the recommendations of the Western Avenue Task Force | 95

ADD an infrastructure capacity study to reach conclusions that are more thorough than a v/c number for individual streets. | 96

#### 4.13.1 Surface Roadways.

ADD: language to the effect that due to its age, San Pedro has many 'sub-standard streets' and many parking challenged areas. The problems caused by this are compounded by the fact that San Pedro streets serve as the access roads to schools, shopping, and freeways for the west and south sides Rancho Palos Verdes and Rolling Hills. | 97

#### Section 4.13.1

- First Paragraph, replace "Tosco" with "Phillips 66" oil refinery
- Highway System Characteristics - first paragraph, ADD First Street & Westmont as major east/west access streets
- Freeways - ADD discussion of impact of China Shipping, TraPac, Kaiser Point Cruise Terminal, widening of 47/110 transition and other port projects
- Major Class II highways - need stronger wording that these are paper designations, not realities
- Gaffey St is one lane in some areas - south of 22<sup>nd</sup> Street
- Channel St - add "And one lane from Gaffey to Park Western where it is a collector Street.
- Secondary Roadways - 1<sup>st</sup> Street replace "throughout" with "through"
- Signalized intersections (page 4.13-6) Last sentence - Delete "Once complete" and change from "will be" to "is"
- Transit Services- need to discuss hodge-podge nature, closest rail stops are in Long Beach and at the Artesia Transit Center and there is no extension anticipated between now and 2030 | 98

4-13.3: ADD: Although Western Avenue is noted as State Highway SR-213, there is no mention of the multi - jurisdictional overlap with RPV. As the only State Highway, daily traffic counts should be included. One particular problem created is the fact that the City of Los Angeles and the County have different traffic management systems (ATSAC in L. A.) for their portions of Western Avenue and they are not coordinated.

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4-13.4: CORRECT: 9<sup>th</sup> Street does not widen to four lanes West of Dodson.

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4-13.4: CHANGE: Centre Street from 1<sup>st</sup> to 7<sup>th</sup>, should be downgraded to a collector street.

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Table 4.13-4,

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- o GV P3.5 ADD reference to Neighborhood Councils
  
- o CHANGE: This table includes a number of references to transit oriented districts that do not exist in San Pedro and hence it gives a false impression. There should be a discussion of the lack of such districts in the plan area and a footnote should be placed with each discussion.

103

4-13.5: CHANGE: Paseo Del Mar, discuss the landslide and cut-off streets and bike paths

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4-13.6: CHANGE: ATSAC is complete in San Pedro.

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Table 4.13-6

- o Policy M3.4 ADD "skateboarders"
- o Policy M.3.5 ADD "...and the development of walking school buses."
- o Policy M4.5 ADD "paper streets"
- o Policy M8.2 DELETE "on residential areas" They should be required to mitigate all traffic impacts, not just on residential areas. In fact one of our biggest problems is the negative impact businesses report
- o Policy M13.3 DELETE "mountain". It should ably to all biking
- o Policy LU 10.1 DELETE reference to CRA/LA
- o ADD a Policy to develop an overall vision for moving people throughout the community.
- o ADD a policy to increase connects to major transit hubs and public transportation lines and to develop light rail to truly connect this peninsula to the city of Los Angeles
- o ADD a policy to formulate and seek funds for a light rail/street car plan within San Pedro to serve the community and visitors - downtown to Western via 13<sup>th</sup> St. Western to 25<sup>th</sup>, 25<sup>th</sup> to Gaffey Street and Gaffey Street to the Korean Bell and back to downtown via 22<sup>nd</sup> street, etc.

106

Figure 4.13.1: CHANGE: This chart does not show roadway connection of 22<sup>nd</sup> Street to Harbor Blvd. Port controlled roadways that are out of the CPA should be included to show connectivity.

107

P 4.13-9-10 Transit Services: ADD: There are six different providers of transportation services in the CPA, including the Trolley provided by the Business Investment District. There is a need for better coordination of these resources in order to improve local and commuter service and provide hubs to connect local transit to longer-range bus service.

108

P 4.13-13 Bicycle Facilities: CHANGE: The Plan seems to rely on increased bicycle use to mitigate traffic. This is not realistic particularly in light of the streets widths and vehicular traffic load for some of the designated bikeways. The connections to the coastal areas and the waterfront need to be improved.

109

P 4.13-6: Regional: ADD: Per the LA County Congestion Management Program there are no plans for improvement projects in the CPA for public transit. Coupled with the area's low ridership of 3% of the population in public transit, it seems challenging for the area to contribute to traffic reduction through these means.

110

P 4.13-32:

- CORRECT: Only weekday PM peak period forecast were considered to analyze the impacts of the proposed plan. Include Saturday peak traffic on Western and Gaffey in the analysis and revise accordingly.
- CORRECT: The San Pedro Community Plan refinements to the LA County Congestion Management Plan omit freeway analysis. What is the impact of commute time and congestion on CPA residents? It may be included in VHT and VMT numbers but that is unclear and in any event, is not broken out by travel on surface streets and freeways.

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4.13-37 Proposed Network Changes:

- CHANGE: Conversion of 5<sup>th</sup> Street from Harbor Blvd to Pacific Avenue to one lane Westbound, and 7<sup>th</sup> Street to one lane Eastbound in the same area lacks detail, and may not coordinate with ideas for the Red Car.
- CORRECT: The report incorrectly states that 5<sup>th</sup> Street is two- lane arterial when it is four lanes from Harbor Blvd. to Mesa.
- ADD: Closing 6<sup>th</sup> Street to vehicular traffic from Harbor Blvd. to Pacific Avenue "should be considered in conjunction with extension of the Red Car".

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4.13-43 COMMENT: Cumulative Impacts: While the Plan does not exceed the SCAG Congestion Management Plan standards, traffic congestion will increase with or without the Traffic Improvement Mitigation Plan.

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COMMENT: Are the intersections at Pacific and Harbor new LOS F intersections because of these improvements? Note table 4.13-11 and table 4.13-12 where the LOS intersections increase from 37 to 39 with the implementation of the TIMP.

117

4.13-43 Cumulative Impacts: COMMENT: While the Plan does not exceed the SCAG Congestion Management Plan standards, traffic capacity and congestion will increase with or without the Traffic Improvement Mitigation Plan.

118

AMEND Bicycle Plan and General Plan to incorporate changes discussed herein.

119

COMMENT: Commute times: Assuming 50% or more of San Pedro residents get on the freeway to commute to work, what are the future impacts of increased goods movement on commute times?

120

COMMENT: Table 8 & 9: Can we predict where the 5-7 new level E&F intersections will be based on the modeling done for the Plan? What additional intersections would be included if the 2010 census data is used [resulting in higher population increase] and also where will they be if SB1818 numbers are included.

121

#### 4.14 Utilities

ADD: Significant cost increases are occurring and the DWP is assuming significant increases in conservation in order to meet demand for water and power

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ADD: Given the uncertainty in water supply and capacities of the local delivery systems, impacts to water are potentially significant and the proposed mitigation is inadequate.

123

4.14-16 Natural Gas ADD discussion of alternative energy, such as Bloom Energy, which relies on Natural Gas, will increase demand.

124

#### 4.14.18 Electricity

CHANGE: Although LADWP has stated there are no current service problems or deficiencies, however, there are significant problems with reliability. If there was sufficient electrical supply, there would be no need for flex alerts. In addition, the Phillips 66 refinery recently experienced complete loss of power from DWP for two hours, causing the refinery to totally shut down and spew pollutants into the air for several hours. The shutdown cost the refinery millions of dollars in lost production and damage to their equipment. The cost of this event will be born by the residents of LA either in increased DWP costs and/or increased gasoline costs. Failures like this are unacceptable to the community.

125

Water resources

p. 4.14-19

CHANGE: We question the statement that area water resources are "expected to be adequate" particularly as it contradicts the conclusion that the impact of supplying the anticipated number of new residents with fresh water over the next 18 years (i.e., until 2030) is "significant and unavoidable."

126

CORRECT: The DEIR projects that, between now and 2030, only 1,242 new residents (not residences) will be added in the Community Plan area - along with 4,820 new dwellings and 3,472,289 square feet of non-residential space. (p. 4.14-19). It is inconceivable that 4,820 new residences would only produce 1,242 new residents. That implies that each new resident would own 4 homes. Harbor Highlands, which is under construction on Gaffey Street, will provide 133 new residences. Ponte Vista proposes around 1,150 new residences. These two projects by themselves will account for far more than 1,242 new people in the area.

127

COMMENT: Additionally, the increase in residents is based on the 2005 estimate that has been addressed elsewhere in these comments. The real increase is more than 7,000 residents. If the impact of 1,242 new residents is "significant and unavoidable," what will happen if more should move in? That the addition of so few new residents will pose such significant challenges to our area's water resources indicates that the system is clearly in a precarious state.

128

COMMENT: The DEIR is filled with so many qualifiers that the report's initial conclusion that supplies will be adequate appears overly optimistic and unsupported. The Los Angeles Department of Water and Power obtains about 71 percent of the water it distributes to its customers from the Metropolitan Water District and gets the rest from groundwater and the Los Angeles Aqueduct. The District in turn gets its water from the Colorado River and the Sacramento-San Joaquin River delta (pp 4.14-1 to 4.14-2). However, the report notes that major questions exist about the extent to which the District will be able to continue to obtain water from either of those sources (pp 4.14-4 to 4.14-5)

129

A combination of drought, climate change and legal restrictions will have the probable effect of making less water available to the District. In other words, evidence suggests that Southern California cannot even count on getting the same amount of water it has received in recent years. DWP should anticipate having to get by with less. Unless existing residents are willing to make dramatic cuts in their usage, there will be no water available for any new residents regardless of the number.

130

COMMENT: The plan calls for the area's projected future needs to be met by "conservation" and re-cycling (p. 4.14-6). To achieve this goal, Los Angeles must undertake such measures to an extent never done before. This leaves some fundamental questions that need to be addressed by the DEIR.

131

## Chapter 6, Alternatives

### 6.2.2 Displaced growth

REWRITE: Instead of general (boilerplate) language, this section should be specific to San Pedro's situation and should reflect the more accurate population figures in the 2010 census data.

San Pedro is primarily a built out community. Nonetheless, many San Pedro residents have participated in SCAG's Compass Growth exercise and we understand the need to accommodate growth in our community. Most of the current residents and the three Neighborhood Councils agreed that downtown was the best place for growth, given the traffic patterns and the need for additional support for the downtown business community. There was general consensus to change the height limits in downtown San Pedro and add capacity for additional residents. This is not a NIMBY community.

The EIR should acknowledge the willingness of San Pedro to take on additional population and the work done to identify the appropriate location where this growth should take place. That said, the argument put forth in the Displaced Growth section seems to justify any added density in the Community Plan because it reduces the need for growth in outlying areas, regardless of the appropriateness of this density or its impact on the San Pedro community. This argument works against the principles incorporated in the proposed Community Plan. No one that we know of is arguing for a No Project Alternative or the SCAG 2030 Forecast Alternative. We only want the best plan possible. The boilerplate language should be removed.

Additionally, since 6.2.2 is written specifically to justify the new community plan over the two alternatives, it should have accurate population figures to compare the impacts of the various alternatives. Using inaccurate 2005 population estimates rather than 2010 actual figures makes the comparisons meaningless.

132



## ADDITIONAL COMMENTS ON THE DRAFT PLAN v3

These comments on the plan are in addition to the comments on the DEIR. Comments previously submitted to the Department that were not incorporated into the Draft Plan v3 have been included here.

### Introduction and Orientation

P1 CHANGE: Replace “transit oriented districts” with “downtown San Pedro”. San Pedro does not have any real transit oriented districts and the closest we come is in our downtown area.

p. 8. EXPLAIN; “This type of focused growth links development with available infrastructure.” What does this sentence mean?

p. 17. EXPLAIN; 2nd paragraph. “It is necessary to view the community in the context of its setting.” What does this sentence mean?

P12 CHANGE; Enterprise Zone – should indicate that it covers nearly all of the commercial areas of the CPA

P 13

- Port – ADD a sentence to the effect that the Port of Los Angeles has a number of negative impacts on the CPA and any evaluation of the Plan must also consider these impacts.
- County - last sentence ADD small businesses; it is actually a local commercial center

### Chapter 2: Community Background

Figure 2-1 – ADD: Crafted at the Port, and Cruise Terminals including Kaiser Point

P 20 ADD: a new sentence at the end of the last paragraph “Many of the streets are narrow and lack adequate off street parking.”

P 22: Relationship to Adjacent Communities – ADD language to acknowledge that a portion of San Pedro is actually contained in the Wilmington-Harbor City Plan Area. On page 44, Ponte Vista is described as though it is not part of San Pedro. It is, regardless of the somewhat arbitrary community plan areas designated by the Planning Department. Also, the description references nearby communities including Rolling Hills but should also include Rolling Hills Estates, a different community that is just as close to San Pedro.

Chart 2.1 p 17 - ADD a footnote regarding the percentage of public facilities that is actually single family and multi family housing.

Table 2-2 (p24) ADD 2010 Census Data; make consistent with table 3-1 in DEIR

P 24 – ADD SB 1818 & Grannie Flat Laws SB1818 destroys rational city planning.  
Comment: The Planning Department should be leading the charge to eliminate SB 1818 in Los Angeles.

### Land Use and Urban Design

P 38 LU1.3 ADD “Create appropriate transitions between residential and commercial and industrial uses.”

P 40-41

- LU 3.8 REWRITE While it is important to provide for Special Needs Housing, San Pedro has a disproportionately large number of such units and there is particular concern regarding the number of for-profit unlicensed facilities particularly in the single-family areas. Additionally, some SROs are very poorly managed and contribute to crime and blight. These should be discouraged!
- LU3.9 – DELETE “without requiring additional parking” or at least require a finding of adequate parking. One of the major problems we face in San Pedro is that so much of our development occurred when one car per family was the standard. Now these homeowners must try to find space on the street. This impacts both the availability of on-street parking and the maneuverability on our narrow streets.
- ADD a Policy to prohibit Above Ground Facilities in residential areas. To the extent possible at least all supporting equipment should be located below grade, out of public view or underground. There is similar language on p. 67, LU18.6. Policy on page 67 should be extended to all residential areas.
- ADD a policy to work toward undergrounding existing utility poles in residential neighborhoods.

P 43 La Rambla

EXPAND Description. This area includes a neighborhood serving commercial area, part of which is actually in the CPA and all of which serves the CPA. The description should be expanded to include the Salvation Army, a large market, and numerous small businesses and on Meyler St. Reword the Reference to Little Company of Mary and a private hospital. It sounds like there are two hospitals, not one. There are however 2 convalescent centers there.

P 44 Ponte Vista

CHANGE: The property is still zoned R-1 and the current zoning should be acknowledged or the document should be silent about the zoning.

ADD four bullets as follows:

- 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.

P 48 - 50

- LU 5.3 ADD liquor stores and pawn shops to discouraged uses
- LU 5.16 ADD "...and to incorporate trees and other greenery"

P 54 CHANGE: Additional residential development should not be encouraged at 25th & Western due to impact on traffic and physical isolation of this area. We oppose this idea.

P 56

- ADD a policy to make Channel Street a "Welcome Gateway": Implement design improvements that provide physical design enhancements welcoming residents and visitors to San Pedro. These should include, but not be limited to street trees, landscaping, lighting, paving, way finding signage, and blight abatement.
- ADD a policy to encourage sidewalk dining.

Port of Los Angles:

- ADD "The Port has recently become home to two major tourist attractions, the USS Iowa and Crafted at the Port, is in the process of creating a downtown harbor. It has plans to add a Cruise Terminal at Kaiser Point, upgrade Ports O Call and develop City Dock 1. All of these projects will have an enormous impact on traffic and parking and hopefully serve as an economic stimulus to the area."

P 60 LU 13.4 EXPAND Discuss more specifically how the Port can be supportive of the community and downtown.

P 61 Industrial areas. 2<sup>nd</sup> paragraph ADD a new third and fourth sentence. "Two major retailers, Home Depot and Target, are also in this area along with the City's

Sanitation Yard. The northern end of the area along N. Gaffey abuts the Phillips 66 Refinery and the Defense Fuel Support Point”

P.62 Goal LU14 ADD a policy related to reducing visual impacts

p 64

- ADD a policy to develop sign, set back, and landscaping standards for North Gaffey
- ADD a policy to increase the buffering of industrial areas from residential areas.

### Mobility

P 77 Figure 4-3

- ADD: Transit priority on Western should continue to Royal Palms;
- ADD bicycle priority on Front St, Harbor Blvd etc Via 22<sup>nd</sup> St and Shoshone Way to Cabrillo Beach and along Paseo Del Mar to Western Avenue
- ADD bicycle priority the entire length of Western
- DELETE bicycle priority on First Street – it is dangerous for bicycles
- ADD First & 9<sup>th</sup> as prioritized for motorized vehicles

P 78 Goal M1: ADD a policy to establish safe routes for skateboarders and discourage them on other streets.

P 80 Policy M2.2. EXPAND this policy or add an additional one related to plans for traffic management in the event of a large funeral procession, sinkhole, or other unexpected event along Western Avenue or other major arteries. Events like this on Western Ave and Gaffey St. are particularly disruptive due to the paucity of north/south arteries.

P 81

- Policy M3.4 ADD reference to skateboarders.
- ADD a policy to link the existing trails including the North Gaffey Greenbelt, Peck Canyon Trails, Bandini Canyon, Leland Park and Welcome Park, and the California Coastal Trail
- ADD a policy to link existing bicycle paths to provide a route from Harbor Regional Park via the North Gaffey Greenbelt and from Harry Bridges via John Gibson Blvd, along Pacific, Front, Harbor Blvd to the Promenade, along the coast to Cabrillo Beach, Paseo del Mar, and up Western to Palos Verdes Drive North.

P 85 Public Transit – ADD: Start the second paragraph with a statement to the effect that public transit to and within San Pedro is extremely limited and while increased

public transit is encouraged by these policies, the outlook for such an increase is not very optimistic.

P 86 ADD policy to upgrade and repair sidewalks to improve pedestrian access and use

P 87 ADD: Discuss the disruption to traffic flow (including bicyclists) as a result of the closure of Paseo Del Mar

P 88 Policy M7.6 ADD " develop and distribute public information about emergency evacuation procedures including signage"

P 90 Goods Movement ADD: minimize impact of truck traffic on local Streets, Highways, and the 110 Freeway.

P 90 Parking Management

- ADD "Since much of the housing stock was built during the one car era, there is inadequate parking in many residential areas. This coupled with the narrower streets in many of those same areas has created traffic flow problems." This is also true, although to a lesser extent, in commercial areas.
- ADD an appropriate policy in this regard.

P 102 Public Schools

- Second paragraph - DELETE reference to District 8
- CORRECT numbers of public schools in accordance with comments DEIR comments
- Second paragraph. ADD "LAUSD also operates the nearly 4-acre Vic and Bonnie Christensen Math, Science, and Technology Center."
- ADD " San Pedro also has several private schools."

#### Community Facilities and Infrastructure

Figure 5-1

- Fort MacArthur -CHANGE "lower reservation" to "middle reservation";
- ADD Knoll Hill as open space;
- ADD 22nd St Park;
- CHANGE North Gaffey St to reflect correct distribution between open space and parks,
- DELETE Wilmington Recreation Center;
- CHANGE: Anderson to a Senior Center, not a Playground;
- CHANGE White Point to White Point Nature Preserve;
- DELETE Palos Verdes Shore Golf Course - this is closed to the PUBLIC

Figure 5-2 ADD private schools

Figure 5-1, 3-1 and 2-1 CHANGE to all show the same Parks & Open Spaces designations

P 109 CORRECT: Sunken City is in Point Fermin, not South Shores

ADD: The San Pedro Skate Park Association has built and operates the Channel Street Skate Park on public land under the 110 Freeway. A new Skate Plaza is being designed for Peck Park.

The following comments are not referenced to specific pages:

1. ADD info on enterprise zone; include the map of the zone as it relates to San Pedro
2. ADD the following policies in the appropriate sections
  - Increase Transit Use.
  - Support a frequent clean burning DASH type system throughout San Pedro
  - Encourage walking busses to reduce traffic congestion around schools
  - Encourage home and community gardens
  - Green the Gaffey Flood Control Channel
  - Encourage Roof Top Garden/greening of parking structures for Ports 'O Call with performance space, play equipment, and other local community building functions
  - Encourage deliveries and trash pick up at night
  - Maximize home ownership
  - Widen sidewalks particularly in pedestrian areas
  - Promote home offices
3. ADD reference Neighborhood Councils and provide a map that shows the areas covered by each of the three councils, including the fact that Northwest includes a portion of the Wilmington Harbor City Plan area.
4. CHANGE the Zoning on North Gaffey from Westmont to the edge of the CPA from Heavy Industrial to Light Industrial.
5. CHANGE: The discussion of transportation is very disjointed. Where is the connectedness of community? The plan should convey an overall vision.

DINA

----- Forwarded message -----

From: diana nave <[diananave@earthlink.net](mailto:diananave@earthlink.net)>  
Date: Tue, Oct 9, 2012 at 3:29 PM  
Subject: one more DEIR comment  
To: Debbie Lawrence <[debbie.lawrence@lacity.org](mailto:debbie.lawrence@lacity.org)>

p. 4.13-9 I just spoke with our local DOT person, San Pedro already has the Adaptive Traffic Control System.

—  
Debbie Lawrence, AICP  
San Pedro Community Planner  
City of Los Angeles Department of City Planning, Policy Planning  
200 N. Spring Street, room 667  
Los Angeles, CA 90012  
(213) 978-1163  
(213) 978-1477 (fax)

~~FRAL~~  
GVF?

----- Forwarded message -----  
From: Fred Allen <fred.allen@cox.net>  
Date: Tue, Oct 9, 2012 at 4:47 PM  
Subject: Comment on San Pedro Community Plan EIR  
To: [Debbie.Lawrence@lacity.org](mailto:Debbie.Lawrence@lacity.org)  
Cc: "Johnson, Liz" <[liz@grandvision.org](mailto:liz@grandvision.org)>

City of Los Angeles Department of City Planning  
Attn: Debbie Lawrence  
200 N. Spring St., Room 667  
Los Angeles, CA 90012

Dear Ms Lawrence,

I am writing in protest of policy within the community plan that would change 6th Street in San Pedro between Harbor Blvd and Pacific Ave. into a pedestrian walkway, (Policy LU9.1). The protest is further refined to the 400 block of 6th St between Mesa St and Pacific Ave.. The 400 block of 6th Street is the ONLY access to the Warner Grand Theatre. Both the audience access and stage access occur on 6th Street. We already have issues of closing the street one day a week for a farmers' market. There have been significant impacts on the programming of the theater due to lack of access to the front door and the stage door. The permanent closure of this block would be in direct conflict with the stated policy of providing greater access and mobility to the challenged community (Policy M1.2) among other issues.

There are heavy economic considerations to consider such a move when one of the areas primary economic engines, the Warner Grand Theatre, will be negatively affected. There are many good reasons for never closing 6th Street with the exception of special events.

The access to the theater will negatively affect persons with physical handicaps and the aged that need to be brought to the front of the theater.  
Closing the street will negatively affect the ability of the theater or its producers from providing valet parking.  
Truck access to the theater loading door would be totally compromised. This will significantly impact any producer seeking to use the theater.  
There have been significant events at the theater where period automobiles and military vehicles have been parked around the theater entrance. Closing of the street and making it a pedestrian walkway would eliminate this as an option.  
The front of the theater and the stage door must always be available for first responders who may be arriving to help an injured audience member or stage personnel.  
There may be a fire or flooding emergency that will require direct access.

I guess that my direct question to anyone proposing this closure is, have you spoken with the Los Angeles Fire Department Office of Public Safety about this? My guess is the answer is no.

This concept is so at odds with allowing the Warner Grand Theatre to become the larger engine of our local economy that it can be. Every restaurant in the core knows when there is a show at the theater. They all do very well that night.

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The closing of the 400 block of 6th Street is a very ill-conceived idea that will cause real damage to our community, our producers and inconvenience our community audience members particularly those with limited mobility due to physical challenges or aging. Please remove this option from the Community plan.

5

Sincerely,

Fred Allen, President, Board of Directors

Grand Vision Foundation

[www.grandvision.org](http://www.grandvision.org)

[fred.allen@cox.net](mailto:fred.allen@cox.net)

310-832-4700

SC

----- Forwarded message -----

From: Al Sattler <alsattler@igc.org>  
Date: Tue, Oct 9, 2012 at 12:03 AM  
Subject: San Pedro Community Plan Draft EIR Comments (Re-Sending with File#)  
To: [Debbie.Lawrence@lacity.org](mailto:Debbie.Lawrence@lacity.org)

Inline below and attached find Sierra Club comments on Reference File  
# ENV-2009-1558-EIR

San Pedro Community Plan  
Draft Environmental Impact Statement Reference File # ENV-2009-1558-EIR

San Pedro Community Plan  
Draft Environmental Impact Statement  
Reference File # ENV-2009-1558-EIR  
Comments  
Sierra Club Angeles Chapter  
Air Quality

(1) Ensure that all portable equipment > 50 brake horsepower (bhp) i.e., engines/engine generator sets, air compressors, etc.) possess either a SCAQMD Permit to Operate (P/O) pursuant to Rule(s) 203/2100 (Permit to Operate / Registration of Portable Equipment) or a Registration Certificate from ARB's Portable Equipment Registration Program (PERP) 13 CCR §2450 - 2465.

1

(2) Ensure that all diesel-fired equipment, including engines and engine-generator sets, exclusively utilize Ultra Low Sulfur Diesel (ULSD) with a sulfur content of ≤ 15 ppmv. Testing of the sulfur content of diesel fuels is available through several private laboratories with the closest being Inspectorate in Harbor City. The low sulfur diesel fuel limit is codified in 13 CCR §2281.

2

(3) Require that all medium-sized and large construction projects employ an on-site meteorological station operated by staff or by a certified outside contractor for generation of localized (project-specific) weather data for use in accordance with SCAQMD Rule 403 n(Fugitive Dust). Religiously comply with all of the requirements obtained in Rule 403.

3

Biological Resources

(4) Survey the four locations for the Palos Verde Blue butterfly (*Glaucopsyche lygdamus palosverdesensis*) identified in Figure 4.3-2 at Harbor Highland Park, Pt. Fermin Park, White Park, Deanne Dana Friendship Community Regional Park / Bogdanovich Recreation Center for the following PV Blue food source plants: (a) California Buckwheat (*Eriogonum fasciculatum*); (b) Santa Barbara Milk Vetch (*Astragalus trichopodus*); and © California Broom / Deerweed (*Lotus scoparius*). If these food source plants are located, undertake all reasonable efforts to ensure their continued survival, and if necessary, introduce additional plants. This strategy has proven successful for the re-establishment of the PV Blue in El Segundo at LAX recently.

4

Safety Risk of Upset

(5) For the Methane Zones identified in Figure 4.7-1, conduct a

↓ 5

full characterization/quantification of methane emissions and emission rates. This exercise should be conducted by LA EAD staff or by certified contractor using a methane meter or a portable GC/FID instrument. Once this exercise has been completed, a decision should be made of whether to utilize this methane resource for either co-generation by collection, dewatering, and combustion to produce steam or steam/energy as done at the LA Co. Sanitation District landfills. For the smaller methane spots, co-located at Pt. Fermin Park, White Park, and Deanne Dana Friendship / Bogdanovich Recreation Center, the collected methane emissions could feasibly be used for hot water heating or other beneficial end-use applications. The City is under an obligation via AB32 for a reduction of GHG emissions to 1990 levels and this characterization/quantification would be a step in this direction.



--  
Debbie Lawrence, AICP  
San Pedro Community Planner  
City of Los Angeles Department of City Planning, Policy Planning  
200 N. Spring Street, room 667  
Los Angeles, CA 90012  
(213) 978-1163  
(213) 978-1477 (fax)

**San Pedro Community Plan  
Draft Environmental Impact Statement  
Reference File # ENV-2009-1558-EIR  
Comments  
Sierra Club Angeles Chapter**

***Air Quality***

\_\_\_\_\_ (1) Ensure that all portable equipment > 50 brake horsepower (bhp) i.e., engines/engine generator sets, air compressors, etc.) possess either a SCAQMD Permit to Operate (P/O) pursuant to Rule(s) 203/2100 (Permit to Operate / Registration of Portable Equipment) or a Registration Certificate from ARB's Portable Equipment Registration Program (PERP) 13 CCR §2450 - 2465.

(2) Ensure that all diesel-fired equipment, including engines and engine-generator sets, exclusively utilize Ultra Low Sulfur Diesel (ULSD) with a sulfur content of  $\leq 15$  ppmv. Testing of the sulfur content of diesel fuels is available through several private laboratories with the closest being Inspectorate in Harbor City. The low sulfur diesel fuel limit is codified in 13 CCR §2281.

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***Safety Risk of Upset***

(5) For the Methane Zones identified in Figure 4.7-1, conduct a full characterization/quantification of methane emissions and emission rates. This exercise should be conducted by LA EAD staff or by certified contractor using a methane meter or a portable GC/FID instrument. Once this exercise has been completed, a decision should be made of whether to utilize this methane resource for either co-generation by collection, dewatering, and

combustion to produce steam or steam/energy as done at the LA Co. Sanitation District landfills. For the smaller methane spots, co-located at Pt. Fermin Park, White Park, and Deanne Dana Friendship / Bogdanovich Recreation Center, the collected methane emissions could feasibly be used for hot water heating or other beneficial end-use applications. The City is under an obligation via AB32 for a reduction of GHG emissions to 1990 levels and this characterization/quantification would be a step in this direction.

GAWI

----- Forwarded message -----

From: Gayle Williamson <gayle@champandmabel.com>  
Date: Tue, Oct 9, 2012 at 2:07 PM  
Subject: San Pedro Draft Community Plan  
To: [Debbie.Lawrence@lacity.org](mailto:Debbie.Lawrence@lacity.org)  
Cc: [Board@nwsanpedro.org](mailto:Board@nwsanpedro.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [kevin.bingham@lacity.org](mailto:kevin.bingham@lacity.org)

October 9, 2012

Debbie Lawrence, AICP

City of Los Angeles Department of City Planning

200 N. Spring Street, Room 667

Los Angeles, CA 90012

Dear Ms. Lawrence,

I want to address some additions and corrections that need to be made to the San Pedro Community Plan.

The first is regarding public transportation in Appendix G – Transportation Improvement and Mitigation Program. I agree that San Pedro needs a transit hub and encouraged that the SCAG RTIP has allocated funding for the planning and engineering for such a site. The Northwest San Pedro Neighborhood Council on April 10, 2006 passed a motion recommending that the transit hub be located at the current CalTrans Harbor-Beacon Park and Ride lot (<http://www.nwsanpedro.org/minutes/min041006.htm>). I agree with the Northwest San Pedro Neighborhood Council that a transit hub be situated at the park and ride lot, especially since the Metro ExpressLanes program promises to make improvements to the park and ride lots serving the Harbor Transitway. Unfortunately our former Los Angeles City council representative was actively working to have the State of California sell this site to the Los Angeles Harbor Department or, most likely, private investors or developers. I hope that a recommendation can be added to the community plan that includes a reference to a transit center at the Harbor-Beacon Park and Ride lot.

Over the years, there has been talk of locating a transit center in downtown San Pedro and fortunately nothing has been done. I say fortunately because according to a report dated April 21, 1997, prepared by Rodney Sakai of the Environmental Assessment Section of the City of Los Angeles, the San Pedro Commercial District (properties on Pacific Avenue and 6th and 7th Streets) are "eligible for inclusion in the National Register of Historic Places under criterion A at the local level of significance." I have a copy of this report and the letter of agreement from Cheryl Widell, California State Historic Preservation Officer. I believe this information needs to be considered in the San Pedro Community Plan.

I would also like to suggest that the San Pedro Community Plan include a section that recommends having the downtown district implement the National Trust for Historic Preservation's Main Street program (<http://www.preservationnation.org/main-street/>), which provides guidelines and support for developing a robust and thriving downtown business area.

In addition there needs to be a correction to Appendix G – Transportation Improvement and Mitigation Program. The TIMP lists the Metro bus lines 205, 225/226, 445, 446/447, and 550 as serving San Pedro. At this time only the 205 and 550 remain. The 446 has been changed to the 226 and the 550 no longer travels to Hollywood, it's northern terminus is 30th and Hoover Streets in Los Angeles. The 445 has been eliminated, replaced by the 450 that only travels to downtown Los Angeles in the morning and evening terminating at the Artesia

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Transit Center during midday.

Thank you in advance for your consideration,

Gayle A. Williamson

1007 S. Malgren Avenue

San Pedro, CA 90732

KIST



Debbie Lawrence <debbie.lawrence@lacity.org>

**Fwd: for Debbie Lawrence**

1 message

**Planning Info** <planning@lacity.org>

Mon, Aug 20, 2012 at 1:34 PM

To: Debbie Lawrence <debbie.lawrence@lacity.org>

Cc: Conni Pallini <conni.pallini-tipton@lacity.org>

Hi Debbie,

I am forwarding the letter below from Mr. Kim Stevens, a constituent from San Pedro.

Thank you,

----- Forwarded message -----

From: **Planning Info** <planning@lacity.org>

Date: Mon, Aug 20, 2012 at 1:32 PM

Subject: Re: for Debbie Lawrence

To: Kim Stevens <stevens@his.com>

Dear Mr. Stevens,

Thank you for your interest in the San Pedro Community Plan. I will forward the letter below to Ms. Debbie Lawrence. If you need to contact her you may reach her at Debbie.Lawrence@lacity.org.

Thank you,

On Sat, Aug 11, 2012 at 1:48 PM, Kim Stevens <stevens@his.com> wrote:

Dear Ms Lawrence,

I have read your Development plan for San Pedro, and have one comment to make that I hope you will consider. I have lived in Pedro for more than a decade, but am still considered to be an outsider "come from afar." It is an outsider with a world-wide vision (I retired here after a full career in the US Foreign Service) that I make the comments below.

I have visited a number of the cruise ports in the western hemisphere including those destinations to which the cruise ships that leave from San Pedro sail. Almost every port of call has, next to where the cruise passengers disembark, what I call a "Potemkin village," a beautiful; and interesting row of stores, restaurants and other things that interest cruise passengers, including duty-free stores for departing passengers (to be delivered to the ship and given to the passengers when the cruise is over.) Behind this façade is often squalor and poverty, but it puts the best image of the port forward.

San Pedro is working in this direction, but along the route to walk to the center of town, which has nice commercial streets, there are two eyesores that deter going into town on foot from the cruise port (and who wants to wait for a shuttle bus). Those blocks are an empty lot with an ugly fence and two blocks of Rancho



San Pedro.

While most San Pedrans would sell their mother to have Rancho San Pedro disappear from the close proximity to the commercial districts, I understand that city politics make this highly unlikely, and Rancho San Pedro is within the same borders in your community development plan. I would suggest that for a slight increase in density in RSP, the two half blocks facing Harbor Blvd could be change from public housing to two half-blocks of small shops, with the street between these blocks closed off and filled with the same kind if shop, providing the image of a long interesting row of businesses.. As the city owns the land and would rent/lease out this space, it could also subsidize the businesses it wants to see along that strip. I am less concerned with the vacant lot, as I know the man who owns it behind the corporate mask, and he plans to put in a medium office tower with street level shops. Additionally, shops along the Harbor Blvd face of RSP would be visible to from the cruise ships and encourage visitation. Such a commercial row, especially if it included interesting architecture that fits in with the retro San Pedro look and places to eat other than fast food joints, would compete with the LA Harbour Ports o'Call redevelopment, but LA City needs the sales tax income and the Port is rich enough to not miss it.

I realize that the above suggestion might be bureaucratically challenging, but it would be entirely within city hall. It should be possible if you buy into the idea.

Regards,

Robert Kim Stevens

3612 S Walker Ave

San Pedro 90731

310-514-8369

stevens@his.com

**Claudia Rodriguez** | Neighborhood Liaison  
CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
200 N. Spring Street, Suite 525  
Los Angeles, CA 90012  
T: (213) 978-1283 | F: (213) 978-0595 | [www.planning.lacity.org](http://www.planning.lacity.org)

*Did you know....* ZIMAS provides you with property information for any parcel within the City of Los Angeles boundaries? Look up zoning, permits, case information, and much more!

9/24/12

City of Los Angeles Mail - Fwd: for Debbie Lawrence

Claudia Rodriguez | Neighborhood Liaison

CITY OF LOS ANGELES

DEPARTMENT OF CITY PLANNING

200 N. Spring Street, Suite 525

Los Angeles, CA 90012

T: (213) 978-1283 | F: (213) 978-0595 | [www.planning.lacity.org](http://www.planning.lacity.org)

*Did you know....* ZIMAS provides you with property information for any parcel within the City of Los Angeles boundaries? Look up zoning, permits, case information, and much more!

JEGA

----- Forwarded message -----  
From: <JGaines852@aol.com>  
Date: Mon, Oct 8, 2012 at 2:51 PM  
Subject: San Pedro Community Plan 2012  
To: [Debbie.Lawrence@lacity.org](mailto:Debbie.Lawrence@lacity.org)

San Pedro Community Planner  
City of Los Angeles Department of City Planning, Policy Planning  
200 N. Spring Street, room 667  
Los Angeles, CA 90012  
(213) 978-1163  
(213) 978-1477 (fax)

Ms. Lawrence:

Just some observations from a local resident of 45 years having served on the 1986 Community Plan Advisory Committee, and as a Planning Commissioner on the Harbor Area Planning Commission under Mayor Richard Riordan, and as Chair of the Western Avenue Corridor Task Force that was formed by Caltrans, RPV, and the City of LA to study the traffic impacts on only one of really two north south routes into the San Pedro area.

1

First, I commend you and your staff for a very complete analysis of the region, and thoughts on how to maintain and improve community planning in the SP Plan area. I supported the HPOZ Vinegar Hill area as a planning commissioner, and would support some expansion here. Also, I commend the goal of the plan to insert height restrictions in commercial areas where they were lacking earlier.

2

My focus in earlier planning activity was on traffic circulation within an area where one actually comes to it, not through it! In regard to Western Ave., findings resulted in Cal Trans investing funds into improving signal coordination within 14 months of the findings made by the task force. In other words Cal Trans recognized the traffic impacts that existed in the early 2000 decade before Ponte Vista was proposed! In other words caution needs to be made on "opportunity" options on land uses near this traffic corridor. Your department recognized this in its earlier reaction to the original Ponte Vista project. Keeping housing density similar to the Gardens for example is where your colleagues expressed support here.

3

Also, your draft maps on traffic circulation need to now reflect the interruption of Paseo del Mar due to the recent landslide!

4

The comments on coordination of City Planning with the Port of LA are critically important. In recent years this has improved so that land uses in each jurisdiction can interface for economic and related benefits for both local citizens and visiting tourists.

5

I note some concern by the Northwest Neighborhood Council on estimated population numbers via the Census and other sources. Most likely some 83,000 to 85,000 numbers seem appropriate for build out. However, specific densities in housing and business uses are more of a factor in impacts on traffic circulation than total numbers. Also the improvements of alternate transportation options impact the effect of the build out numbers.

6

Thank you for your work on the SP Plan.

7

Best regards,

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