



# City of Los Angeles

Department of City Planning • Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## **FINAL ENVIRONMENTAL IMPACT REPORT - Appendices**

### **WILMINGTON-HARBOR CITY COMMUNITY PLAN AREA**

This document, together with the Draft EIR and its appendices, comprise the Final EIR as required under the California Environmental Quality Act

## **Ponte Vista Project**

Case Number: ENV-2005-4516-EIR  
State Clearinghouse Number: 2010101082

**Project Location:** 26900 South Western Avenue, Los Angeles, California, 90732

**Council District:** 15

#### **Project Description:**

The Project proposes a Specific Plan (proposed density is approximately 13.5 units per acre), General Plan Amendment, Zone Change, and Vesting Tentative Tract Map for the subdivision, construction, and operation of an 830-unit residential development. The Project's residential units would be comprised of single-family, townhome, flat, and apartment units ranging in size from 600 to approximately 2,800 square feet, within buildings constructed over and/or adjacent to residential parking garages. Up to 218 of the 830 units may be rental units. The Project would also provide an access road from Western Avenue to the off-site, private Mary Star of the Sea High School. The Project Site is approximately 61.5 acres. The Project would incorporate internal open space and recreational areas, including a community clubhouse and pool/recreation area and approximately 7.1 acres of park area. Additional recreational amenities would be distributed throughout the site. The Project would involve the demolition and removal of all existing improvements on the Site, which include 245 vacant residential units, a 2,161-square foot community center, and a 3,454-square foot retail convenience facility which were constructed in approximately 1962 by the U.S. Navy for the purpose of housing and accommodating personnel stationed at the Long Beach Naval Shipyard. The Site (formerly known as "San Pedro Housing") was closed in the late 1990s.

**APPLICANT:**  
SFI Bridgeview, LLC

**PREPARED BY:**  
CAJA Environmental Services

**ON BEHALF OF:**  
The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

**June 2013**

## Appendix A

Comment Letters on the Draft EIR



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

January 8, 2013

Erin Strelch  
City of Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Ponte Vista  
SCH#: 2010101082

Dear Erin Strelch:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 7, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

Document Details Report  
State Clearinghouse Data Base

Comment Letter No. A1 (Cont)

**SCH#** 2010101082  
**Project Title** Ponte Vista  
**Lead Agency** Los Angeles, City of

**Type** EIR Draft EIR  
**Description** NOTE: Review Per Lead

The Project Site is currently improved with 245 residential dwelling units, a community center, and a retail convenience facility that were constructed in approximately 1962 by the U.S. Navy for the purpose of housing personnel stationed at the Long Beach Naval Shipyard. All of these buildings and uses are vacant. The dwelling units and facilities were built by the United States government without compliance with building codes enforced by the City of Los Angeles, and are required to be demolished. In addition, the dwelling units, facilities, infrastructure, streets, and landscaping at the Project Site were abandoned after the site was closed in the late 1990s and are in a state of disrepair. As part of the Project, all existing improvements would be removed from the Site. The Project consists of the development of a residential community comprised of 1,135 dwelling units featuring a combination of for-sale and rental single-family homes, duplexes, townhomes, and flats. The Project would be comprised of a combination of for-sale and rental dwelling units.

**Lead Agency Contact**

**Name** Erin Strellich  
**Agency** City of Los Angeles Department of City Planning  
**Phone** 213 978 1351 **Fax** 213-978-1343  
**email** Hadar.Plafkin@lacity.org  
**Address** 200 N. Spring Street, Room 750  
**City** Los Angeles **State** CA **Zip** 90012

**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long** 33° 46' 6" N / 118° 18' 27" W  
**Cross Streets** Western Avenue / John Montgomery Drive  
**Parcel No.** 744-2001-BRK  
**Township** 5S **Range** 14W **Section** 2 **Base** SBB&M

**Proximity to:**

**Highways** SR-1, 47, 213, I-110  
**Airports**  
**Railways**  
**Waterways** Port of Los Angeles  
**Schools**  
**Land Use** Present Use: Abandoned Residential Units  
Z: R1-1XL  
GPD: Low Residential

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Document Details Report  
State Clearinghouse Data Base**

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**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

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**Date Received** 11/08/2012      **Start of Review** 11/08/2012      **End of Review** 01/07/2013

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**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: December 10, 2012

TO: Erin Strelch, Planning Assistant  
Department of City Planning

FROM: Ali Poosti, Division Manager  
Wastewater Engineering Services Division  
Bureau of Sanitation



**RECEIVED**  
CITY OF LOS ANGELES  
**DEC 13 2012**  
ENVIRONMENTAL  
UNIT

SUBJECT: **Ponte Vista Project – Notice of Completion Draft EIR**

This is in response to your November 8, 2012 letter requesting a review of your proposed residential community project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

**WASTEWATER REQUIREMENT**

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

A2-1

**Projected Wastewater Discharges for the Proposed Project:**

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b><i>Proposed</i></b>			
Residential: 2-BR	150 GPD/DU	689 DU	103,350
Residential: 3-BR	190 GPD/DU	229 DU	43,510
Residential: 3-SFD	230 GPD/DU	217 DU	49,910
<b>Total</b>			<b>196,770</b>

**SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on Taper Ave. The sewage from the existing line continues into an 8-inch line on Sandwood Pl, 10-inch line on Westmont Dr, and 24-inch line on Gaffey St, before finally discharging into a 42-inch line on Pacific Ave. Figure 1 shows the details of the sewer system within the vicinity of the project.

A2-2



The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Taper Ave	*	458,645 GPD
8	Sandwood Pl	15	261,468 GPD
10	Westmont Dr	28	884,470 GPD
24	Gaffey St	37	4.50 MGD
42	Pacific Ave	39	33.07 MGD

\* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Terminal Island Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

**STORMWATER REQUIREMENTS**

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

**POST-CONSTRUCTION MITIGATION REQUIREMENTS**

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook – Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: [www.lastormwater.org](http://www.lastormwater.org). It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

**GREEN STREETS**

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green

A2-2  
(Cont)

A2-3

A2-4

Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

A2-4  
(Cont)

### CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

A2-5

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3<sup>rd</sup> Fl, Station 18

### SOLID RESOURCE REQUIREMENTS

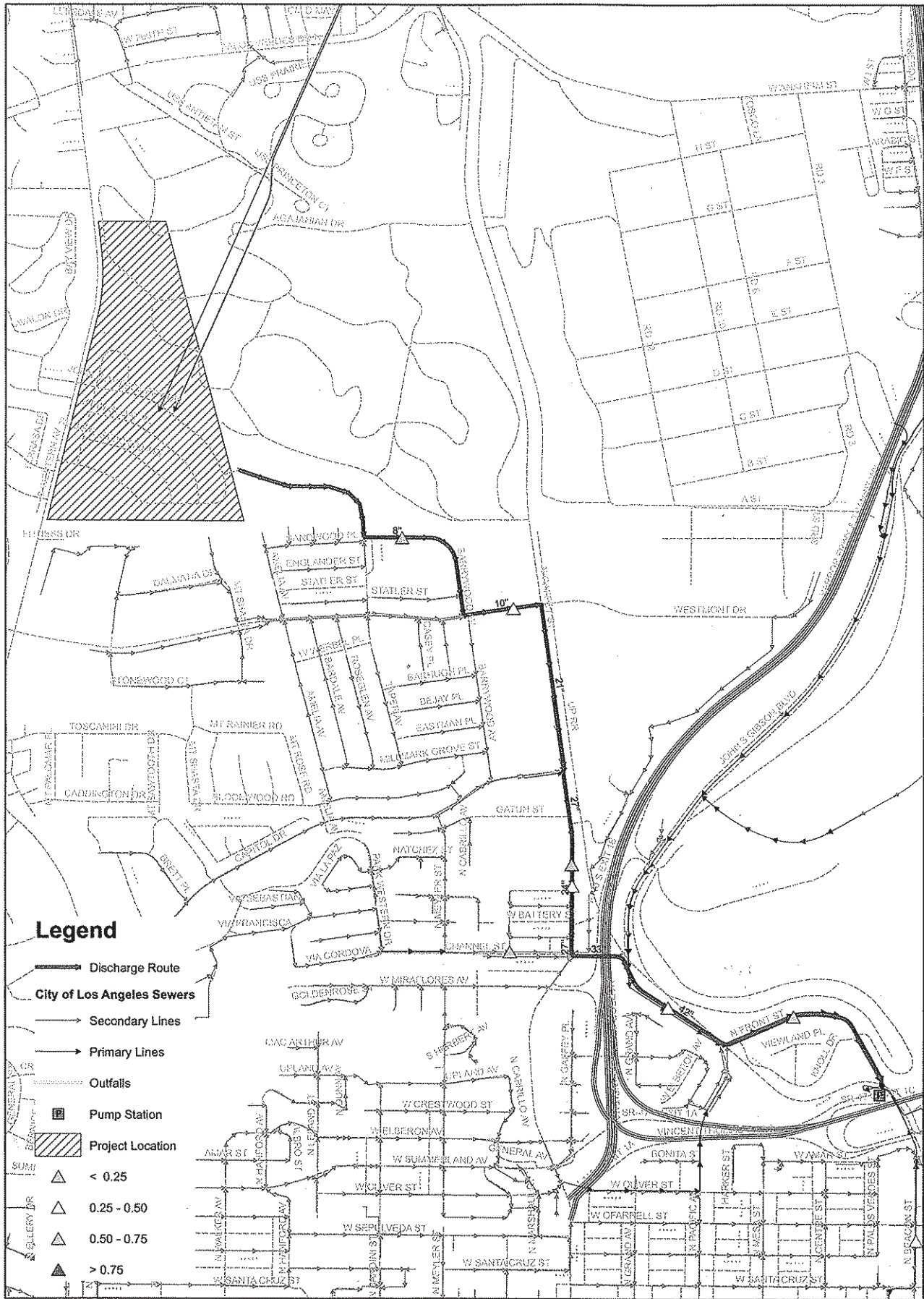
The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213) 485-3684.

A2-6

Attachments:  
Figure 1 – Sewer Map

cc: Kosta Kaporis, BOS  
Daniel Hackney, BOS  
Rowena Lau, BOS





**Legend**

- Discharge Route
- City of Los Angeles Sewers**
- Secondary Lines
- Primary Lines
- Outfalls
- Pump Station
- Project Location
- < 0.25
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75

Wastewater Engineering Services Division  
Bureau of Sanitation  
City of Los Angeles



**FIGURE 1**  
**Ponte Vista Project**  
**Sewer Map**



0 530 1,060 1,590 2,120  
Feet

Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP

From: **Daniel Blankenship** <[DSBlankenship@dfg.ca.gov](mailto:DSBlankenship@dfg.ca.gov)>  
Date: Tue, Dec 11, 2012 at 10:59 AM  
Subject: Ponte Vista DEIR SCH 2010101082  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strelch,

Thank you for the opportunity to comment on the subject DEIR. The Department concurs with the biological mitigation measures proposed with the following comments.

1. The Department concurs that a streambed alteration agreement notification will be needed for this project. The mitigation necessary for that agreement may differ from the BIO - 4 measure of 1:1 depending on the local conditions determined by the DFG staff during a future site visit.

2. The Department concurs with the use of native plant species for re-vegetation on this project and understand that there will be approximately 3,518 trees planted on the project site during project implementation.

Please feel free contact me if you have any questions or if you need DFG staff consultation during project implementation.

Thanks,

Daniel S. Blankenship  
Staff Environmental Scientist  
CA Department of Fish and Game  
P.O. Box 802619  
Santa Clarita, CA 91380-2619  
phone/fax [\(661\) 259-3750](tel:(661)259-3750)  
cell [\(661\)644-8469](tel:(661)644-8469)  
[dsblankenship@dfg.ca.gov](mailto:dsblankenship@dfg.ca.gov)

A3-1

**EDMUND G. BROWN, JR.**, Governor  
**CHARLTON H. BONHAM**, Director



State of California -The Natural Resources Agency  
**DEPARTMENT OF FISH AND GAME**  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
 www.dfg.ca.gov



November 27, 2012

Erin Strelch  
 Environmental Analysis Unit (05-04516)  
 Department of City Planning  
 City of Los Angeles  
 200 N. Spring Street, Room 750  
 Los Angeles, CA 90012

Subject: CEQA Filing Fee Exemption Request

Project Name: Pointe Vista Project

SCH Number and/or local agency ID number: SCH No. 2010101082

Dear Ms. Strelch:

Based on a review of the project referenced above, the Department of Fish and Game has determined that for the purposes of the assessment of CEQA filing fees (Fish and Game Code Section 711.4(c)) the project has the potential to affect fish and wildlife, or their habitat, and the project as described requires payment of a CEQA filing fee pursuant to the California Code of Regulations, Title 14, Section 753.5(d). At the time of filing of the Notice of Determination with the county clerk or Office of Planning and Research (State Clearinghouse), the appropriate CEQA filing fee will be due and payable. Please see the following website for a list of current fees:

[http://www.dfg.ca.gov/habcon/ceqa/ceqa\\_changes.html](http://www.dfg.ca.gov/habcon/ceqa/ceqa_changes.html)

This determination is for the purpose of assessment of CEQA filing fees and is independent of a lead agency's conclusion or determination regarding a project's effect on the environment pursuant to CEQA Statute 21082.2 or CEQA Guidelines 15064. If you have any questions, please contact me at (661) 259-3750.

Sincerely,

Daniel Blankenship  
 Staff Environmental Scientist

A4-1

**CITY COUNCIL**

MARGARET ESTRADA  
JIM GAZELEY  
HENRY SANCHEZ JR.  
MICHAEL G. SAVIDAN  
BEN TRAINA



**Comment Letter No. A5  
ADMINISTRATION**

MICHAEL ROCK  
CITY MANAGER

**CITY OF LOMITA**

December 19, 2012

Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Attn: Erin Strellich, Planning Assistant (Email – [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org))

Subject: Ponte Vista DEIR – Case No. ENV-2005-4516-EIR (26900 Western Avenue)

To Whom It May Concern:

Thank you for the opportunity to provide comment on the aforementioned project.

The Project proposes a Specific Plan (proposed density is approximately 18 units per acre), General Plan Amendment, Zone Change, and Vesting Tentative Tract Map for the subdivision, construction, and operation of a 1,135-unit residential development. The Project's residential units would be comprised of single-family, duplex, townhome, flat, and apartment units ranging in size from 600 to approximately 2,800 square feet, within buildings constructed over and/or adjacent to residential parking garages. Up to 392 of the 1,135 units may be rental units.

The Project would also provide an access road from Western Avenue to the off-site, private Mary Star of the Sea High School. The Project site is approximately 61.5 acres. The Project would incorporate large internal open space and recreational areas, including an approximately 2.8-acre park, 1.3-acre community clubhouse and pool/recreation area and an approximately 0.7-acre open space and trail network. Additional recreational amenities would be distributed throughout the site. The Project would involve the demolition and removal of all existing improvements on the site, which include 245 vacant residential units, a 2,161-square foot community center, and a 3,454-square foot retail convenience facility which were constructed in approximately 1962 by the U.S. Navy for the purpose of housing and accommodating personnel stationed at the Long Beach Naval Shipyard. The site (formerly known as “San Pedro Housing”) was closed in the late 1990s.

**The City of Lomita opposes the Ponte Vista project based on the following issues:**

R-1 Zoning Should be Maintained

The site should maintain and be developed under the existing R-1 zoning. The approval of a specific plan would allow densities over 20 units per acre which is more in line with medium-high density residential.

A5-1

A5-2

Density

Using the current project description, the project’s density was calculated utilizing the entire 61.5 acre site (18 units per gross acre). The net density is actually over 20 units per acre. We still question the basis for calculating the density in this manner since it will yield a lower gross acreage per unit over the entire site rather than on only the actual net residential acreage (i.e., the areas covered by open space and private streets are being allowed to count as residential land when determining the units per acre). This can mislead the public into thinking that the proposed density is lower than what it actually is. Many jurisdictions calculate permissible density based on the net residential acreage (not the entire site that includes streets and open space). Even at the lower density level, the proposed project and the various alternatives would still be requesting amendments to the general plan, zoning and a specific plan request to increase the permissible density above what is normally allowed under a single family residential zone. This level of density is not appropriate for the surrounding community and will have substantial environmental impacts (e.g., traffic, noise, aesthetics and air quality) that cannot be mitigated adequately.

A5-2  
(Cont)

Construction-Related Vehicle Trips

Due to the number of residential units and the length of expected construction time, the City of Lomita has concern with the number of large construction vehicles entering and exiting the site particularly during grading and demolition activities. A number of these vehicles particularly the off-site load hauling vehicles may need to go through the City of Lomita to get to its final destination. For this reason, we request that the following 2 proposed mitigation measures be amended as follows:

**NO-6** All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. **Prior to the commencement of construction at the project site, a meeting shall be held with the surrounding cities (including the City of Lomita). The purpose of the meeting will be to designate truck routes for off-site load hauling vehicles and other construction-related vehicles.**

A5-3

**NO-7** Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding **cities**, off-site residential, school, and memorial park properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

Transportation and Traffic

The Transportation and Traffic section of the DEIR is based on the Traffic Impact Study, Ponte Vista at San Pedro, City of Los Angeles, California, March 2012 prepared by Linscott, Law & Greenspan Engineers (LL&G). As stated on page IV.N-61, the project at full build out would generate 7,382 vehicle trips per day.

The City believes that the reliance of existing condition traffic data in the DEIR from 2010 (more than 2 years old) may not accurately show the true impact of the project on traffic. The increase in the number of residential units will create a substantial impact on surrounding roadways

A5-4

including Western Avenue. The vehicle trips will also create a negative impact on other intersections within the City of Lomita along Pacific Coast Highway, Palos Verdes Drive North, Crenshaw Boulevard, Narbonne Avenue and Lomita Boulevard. A project with a lower density (7-10 units per acre as opposed to 20+ units per acre) would be more appropriate for the subject site.

A5-4  
(Cont)

Intersection Analysis

The analysis of study intersections within the City of Lomita included the following intersections:

- A. Arlington Avenue (Narbonne Avenue)/Lomita Boulevard (#8)
- B. Narbonne Avenue/Pacific Coast Highway (#9)
- C. Western Avenue/ Palos Verdes Drive North (#15)
- D. Crenshaw Boulevard/Lomita Boulevard (#5) is adjacent to the City border

A5-5

Page I.V.N-3 (and throughout the document) Map No. 9 should be corrected to read Narbonne Avenue/Lomita Boulevard. Arlington Avenue is located within the City of Torrance north of 240<sup>th</sup> Street. The City also believes that that the intersection of 262<sup>nd</sup> Street and Western should have also been included as one of the study intersections.

Table IV.N-6 provides the existing (2010) summary of the Vehicle Capacity (V/C) and Level of Service (LOS) analysis conducted on the City's 4 study intersections.

- The intersection of Crenshaw Bl./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Narbonne Ave./Lomita Bl. in the PM peak period currently operates at LOS E.
- The intersection of Western Ave./Palos Verdes Drive North in the AM and PM peak period currently operates at LOS E and LOS D respectively.
- The City's general concern is that many of these intersections already operate at below acceptable standards and any incremental increase from a 1,135 unit development will make existing conditions that much worse.
- Of particular concern is the intersection of Western Ave./Palos Verdes Drive North which under the 2017 analysis would operate at LOS F for both the AM and PM peak periods. Although the DEIR states that with the proposed mitigation measure (Trans – 5) the impact to this intersection would be less than significant, there is no specific analysis in the Transportation/Traffic section that analyzes/confirms this.
- The overall impact of this development on Pacific Coast Highway for some intersections adjacent to and outside of Lomita is problematic. In particular, the intersection of Crenshaw Bl./Pacific Coast Highway (in the p.m. peak period) and Western Avenue/Pacific Coast Highway (during all study period including Saturdays) will cause significant residual traffic increases to Pacific Coast Highway within Lomita that will negatively impact LOS.
- Many of the proposed transportation mitigation measures require improvements in jurisdictions of neighboring cities and Caltrans. Have these agencies been consulted?

A5-6

A5-7

A5-8

The City of Lomita has not received any communication from the developer, traffic consultant or environmental consultant on the feasibility of mitigation measure Trans-5 relative to restriping and other modifications proposed at PV Drive North and Western Avenue.

A5-8  
(Cont)

**Should the City of Los Angeles approve the project, the City of Lomita would prefer Alternative C which proposes 830 residential units at a density of 19.5 units per acre. This would be a reduction of 305 residential units from the proposed project.**

A5-9

If you have any questions, you may contact Gary Sugano, Assistant City Manager at (310) 325-7110, extension 121.

Sincerely,



Margaret Estrada  
Mayor  
City of Lomita

CC: City Council  
Michael Rock, City Manager  
Honorable Joe Buscaino, Council District 15, 200 N. Spring Street, Room 425, Los Angeles, CA 90012  
Nancy Castiglione, 26248 Alta Vista Avenue, Lomita/Harbor City, CA 90710  
Ruth Herbert, 26824 Via Desmonde, Lomita, CA 90717  
City of Rancho Palos Verdes, City Council and Joel Rojas, Planning Director  
City of Rolling Hills Estates, City Council and David Wahba, Planning Director

From: **South Bay Parkland Board of Directors** <[sbparksinfo@gmail.com](mailto:sbparksinfo@gmail.com)>

Date: Mon, Dec 31, 2012 at 6:59 AM

Subject: Response to Ponte Vista Project DEIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Ponte Vista DEIR response from the South Bay Parkland Conservancy

Is this email not displaying correctly?  
[View it in your browser.](#)



## Response to the Ponte Vista Project DEIR

**Dear Ms. Strelich,**

The South Bay Parkland Conservancy is dedicated to helping make the community a better place by encouraging and assisting with the acquisition of Parklands. Our organization was established in 2004 and we work with residents, local and state government and other like-minded organizations in our efforts to "Leaving a Legacy of Open Space".

The national average for parkland in the US is 12.9 acres per thousand residents (Trust for Public Land 2009) and the Federal recommendation level for parkland is set at 10 acres per thousand residents (Lancaster 1990). Los Angeles, including the South Bay, is "park poor". San Pedro has 3.7 park acres per thousand residents (Sustainable Cities Program, 2002). As you're aware, the open space inventory for the South Bay includes beaches and community centers.

A6-1





The South Bay Parkland Conservancy views the LA City staff recommendation for the Ponte Vista Project as specified in the DEIR as a **major missed opportunity**. To summarize:

- ☒ The estimated population for this project site will be 2,923. Though the calculation is based on US Census figures, this population is likely conservative for the 1,135 residences being proposed.
- ☒ The open space will only be 5.65 acres.
- ☒ **This plan provides for less than 2 acres of open space per thousand residents!**

A new development project should not be allowed to move forward when it further deprives the South Bay of the health benefits of open space.

Sincerely,

The South Bay Parkland Conservancy Board of Directors

<http://www.southbayparks.org>

**Our mailing address is:**

South Bay Parkland Conservancy  
PO Box 7000-408  
Redondo Beach, CA 90277

[Add us to your address book](#)

Sent to [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org) — [why did I get this?](#)  
[unsubscribe from this list](#) | [update subscription preferences](#)

South Bay Parkland Conservancy · PO Box 7000-408 ·  
Redondo Beach, CA 90277

MailChimp



**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

Comment Letter No. A7

213.922.2000 Tel  
metro.net

December 28, 2012

Ms. Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: Ponte Vista Project

Dear Ms. Strelch:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Draft Environmental Impact Report (DEIR) for the Ponte Vista Project. This letter conveys recommendations from MTA concerning a number of issues in relation to the proposed project.

Congestion Management Program Statutory Requirements

In accordance with the State of California Congestion Management Program (CMP) statute, the Traffic Impact Analysis (TIA) contained in the Ponte Vista Project Draft EIR identifies CMP Arterial Monitoring Station #58 (Western Avenue and Pacific Coast Highway) which would be significantly impacted by the proposed project. Per the CMP TIA Guidelines published in the "2010 Congestion Management Program for Los Angeles County", Appendix D, section D.9, the EIR should include the following in relation to CMP Arterial Monitoring Station #58:

- 1) Identification of Mitigation. Mitigation Measure TRANS-4 should include a clear indication of the following:
  - Cost estimates, indicating fair share costs to mitigate the impact of the proposed project. If the improvements from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips;
  - Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

A7-1

Potential Impacts to Metro Bus Service

- 1) The Metro bus stop relocation proposed as part of Mitigation Measure TRANS-12 in the Draft EIR must include installation of a full bus pad in the street at the location of the new stop. Contact Pete Serdienis, Metro Stops & Zones Facilities Maintenance Manager regarding any questions and/or coordination efforts. Mr. Serdienis can be reached at 213-922-5190 or by email at SerdienisP@metro.net;
- 2) Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators may also be impacted and therefore should be included in construction outreach efforts.

A7-2

MTA's Response to the Notice of Preparation

There is no indication in the Draft EIR or its appendices that the lead agency received MTA's response to the Notice of Preparation for the proposed project. The letter is dated November 10<sup>th</sup>, 2010 and is attached for your reference.

If you have any questions regarding these comments, please contact me at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

A7-3

MTA CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,



Scott Hartwell  
CEQA Review Coordinator, Long Range Planning

Attachment



**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

Comment Letter No. A7 (Cont)

213.922.2000 Tel  
metro.net

November 10, 2010

Mr. Hadar Plafkin  
Project Coordinator  
Environmental Review Section  
200 N. Spring Street, Room  
Santa Monica, CA 90401

Dear Mr. Plafkin:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Ponte Vista project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with highway, freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix B. The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;
4. A summary of the existing transit services in the area;
5. Estimated project trip generation and mode assignment for both morning and evening peak periods;
6. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit;
7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Hartwell", with a long horizontal flourish extending to the right.

Scott Hartwell  
CEQA Review Coordinator, Long Range Planning



7 January 2013

VIA ELECTRONIC AND U.S. MAIL

Erin Strellich, Planning Assistant  
 Department of City Planning  
 Environmental Review Section  
 200 N. Spring St., Rm. 750  
 Los Angeles, CA 90012

**SUBJECT** Comments in Response to the Notice of Availability/Completion of a Draft Environmental Impact Report for the Proposed *Ponte Vista* Project, 26900 South Western Avenue (Case No. ENV-2005-4516-EIR)

Dear Ms. Strellich:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the Notice of Availability/Completion (NOA/C) for the above-mentioned project. The City respectfully offers the following comments on the content and analysis of the Draft EIR (DEIR) for the proposed project:

- 1) From the outset, the City of Rancho Palos Verdes would like to take this opportunity to remind the City of Los Angeles that the purpose of an EIR is to disclose and describe the environmental impacts of a proposed project in a logical and concise manner so that decision makers are able to make fully-informed decisions before taking action on the proposed project in question. In the case of this EIR, however, it is clear that the project proponent has no intention of building or seeking entitlements to build the so-called "proposed" project, but instead intends to pursue Alternative C, as described in Section VI of the DEIR. Nevertheless, thousands of pages of descriptions, diagrams, analyses and technical appendices are expended on the "proposed" project in the DEIR, while fewer than one hundred fifty (150) pages at the back of the DEIR are devoted to the analysis of all four (4) project alternatives combined. We appreciate that the project proponent's decision to abandon the "proposed" project in favor of 830-unit Alternative C or 1,135-unit Alternative D may have been in response to significant geotechnical issues that were identified on the site after the initial circulation of the Notice of Preparation (NOP) in October 2010. However, at that point, the project description should have been revised to address these changed circumstances and the NOP recirculated. Instead, we are now presented with a DEIR that includes a minutely-detailed analysis of a

A8-1

Erin Strellich  
 7 January 2013  
 Page 2

“proposed” project that the project proponent has no interest in pursuing, and superficial analyses of the “real” project proposal (i.e., Alternative C or D). Therefore, before we comment in more detail on the DEIR as presented, the City of Rancho Palos Verdes wishes to go on record as requesting that the DEIR be completely re-written with either Alternative C or Alternative D as the “proposed” project—accompanied by appropriately re-written descriptions, diagrams, analyses and technical appendices—and re-circulated for a new public review and comment period.

A8-1  
 (Cont)

2) The City respectfully takes exception with some of the “important planning issues” purportedly addressed by the “proposed” project (pp. I-8 to I-9):

a) The introduction states that the “site’s size and relative physical isolation make it possible to avoid or reduce many of the typical ‘adjacency’ impacts that result from infill development.” While the proposed project may be remote from the developed areas to the north and east by virtue of the adjacent Defense Fuel Support Point San Pedro, no comparable buffer is provided from the adjacent neighborhoods in San Pedro to the south or Rancho Palos Verdes to the west.

A8-2

b) Furthermore, the introduction asserts that the increased residential density proposed is necessary to meet regional housing needs, and notes that the project site is located near “the Ports of Los Angeles and Long Beach, which are among the region’s largest employers.” However, as far as we can tell, the “proposed” project includes absolutely no provisions to ensure that any of the proposed housing units would be made affordable or accessible to Port or Port-related employees, other than by virtue of mere physical proximity.

A8-3

3) The City appreciates that a much more comprehensive assessment of the aesthetic impacts of the “proposed” project was conducted in the current DEIR than was the case for the previous 2,300-unit proposal in 2007. This included the acknowledgement that adverse impacts upon views characterized by man-made features—such as those that occur in and around Los Angeles Harbor—are potentially significant. Views of the Harbor area—especially at night—are a prominent visual feature of Rancho Palos Verdes neighborhoods along Western Avenue, and the City of Rancho Palos Verdes frequently considers (and protects) city-light views of the harbor when considering development proposals. Unfortunately, the DEIR dismisses adverse impacts to views from private property in the City of Rancho Palos Verdes as less than significant. This includes views from Green Hills Memorial Park and from homes in the *Rolling*

A8-4

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 Page 3

*Hills Riviera* neighborhood on the west side of Western Avenue. The City of Rancho Palos Verdes takes this opportunity to formally object to this assessment. We also offer the following specific comments on Section IV.B (Aesthetics):

A8-4  
(Cont)

a) There are repeated references in Section IV.B to homes on “Palondra Drive” in Rancho Palos Verdes. There is no such street in the City, and we are unsure what homes the DEIR is referring to.

A8-5

b) The description of private viewing areas in Rancho Palos Verdes (pp. IV.B-19 to IV.B-20) identifies two (2) neighborhoods on the west side of Western Avenue to the south of Green Hills Memorial Park that overlook the project site. In fact, there is only one (1) residential neighborhood in this area, which is known as *Rolling Hills Riviera*.

A8-6

c) The “before-and-after” photographic simulations included in Section IV.B—which we find to be crude, at best—should be placed closer to one another in the DEIR so as to make it easier for readers to compare the photos and draw their own conclusions. In the current DEIR, these “before-and-after” images are separated by two (2) dozen or more pages of text.

A8-7

4) We were surprised to learn (as, we suspect, was the project proponent) of the existence of a subsurface fault crossing the subject property, as described in Section IV.F (Geology & Soils). As mentioned above, we appreciate that this discovery drove changes in the site plans of the project alternatives so as to protect future residents, resulting in the designation of a 100-foot-wide seismic setback zone (Mitigation Measure GEO-1). However, we believe that the discovery of this issue should have resulted in complete reconsideration of the description of the “proposed” project and recirculation of the DEIR, as described above in Comment 1.

A8-8

5) We have several comments with respect to the assessment of Hazards and Hazardous Materials in the DEIR (Section IV.H):

a) Section IV.H describes the health risk assessment (HRA) conducted in relation to toxic air contaminant (TAC) emissions from several industrial sources near the project site (i.e., DFSP, ConocoPhillips and the Port of Los Angeles). However, we were surprised to read that among the sites that were not included in the HRA was the Rancho LPG facility at North Gaffey Street and Westmont Drive (p. IV.H-25). This omission is of

A8-9





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Page 4

particular concern due to recent incidences of TAC emissions (i.e., leaks) at both ConocoPhillips (September 2012) and Rancho LPG (October 2012), both of which we understand are under investigation by the AQMD.

A8-9  
(Cont)

b) The analysis of off-site releases of hazardous materials notes that an independent risk-of-upset hazard analysis was performed in relation to the DFSP and ConocoPhillips, but not Rancho LPG. Given the high level of public concern about the Rancho LPG facility in recent years, we believe that it would have been most prudent to include all three (3) of these facilities in the independent risk-of-upset hazard analysis.

A8-10

c) The DEIR concludes that the “proposed” project has no impact with respect to conflicts with adopted emergency response plans, based (at least in part) upon an assertion that the City of Rancho Palos Verdes has not designated Western Avenue as an emergency evacuation route along the frontage of the project site (p. IV.H-41). The DEIR cites an exhibit in the Safety Element of the Rancho Palos Verdes General Plan (Figure 39, Disaster Routes) that was not updated after the *Eastview* area was annexed by Rancho Palos Verdes in 1983. However, the text accompanying this exhibit notes that routes depict on Figure 39 are conceptual and that the designation of evacuation routes is found in the Emergency Operations Plan (EOP) and Standard Operating Procedures (SOP), not in the General Plan. Furthermore, the City of Rancho Palos Verdes is currently updating its General Plan, and expects that Western Avenue—the major north-south arterial serving the *Eastview* area of the City—will be incorporated into the updated version of Figure 39. As such, the City of Rancho Palos Verdes believes that the “proposed” project is very likely to have an effect upon emergency response in the *Eastview* area of the City, and that this effect should be analyzed in the DEIR.

A8-11

d) Finally, notwithstanding the discussion on p. IV.H-18 of the DEIR, the City of Rancho Palos Verdes believes that the project site is within a 2-mile radius of Torrance Municipal Airport (TOA), so that the potential aircraft safety hazards posed for future residents should be assessed in the DEIR.

A8-12

6) The discussion of Land Use/Planning impacts suggests that the “proposed” project is necessary to meet a variety of perceived housing needs, even though the existing residential density of the project site would be increased by more than four (4) times. We do not believe that the DEIR adequately demonstrates the need for higher-density residential development on this site or in the surrounding community. In fact, we would point out that existing, unsold higher-

A8-13



Erin Strellich  
 7 January 2013  
 Page 5

density developments located to the south of the project site and in downtown San Pedro actually demonstrate that there is a glut of this type of housing in the local market. The City remains concerned that a proposal for residential densities in excess of eighteen (18) units per acre for this site will be out of character with the surrounding patterns of development, both in Rancho Palos Verdes and Los Angeles.

A8-13  
(Cont)

7) The analysis of Noise impacts in the DEIR (Section IV.K) concludes that there will be significant and unavoidable exterior noise impacts of the “proposed” project upon certain project residences located along the Western Avenue frontage of the site. We question if there may be similar, adverse exterior noise impacts to existing residences on the west side of Western Avenue in Rancho Palos Verdes that have not been adequately addressed in the DEIR.

A8-14

8) The City respectfully disagrees that the growth in housing and population directly attributable to the proposed project would be beneficial to the surrounding community, and believes that it would be of negligible regional benefit toward achieving jobs/housing balance. The DEIR purports that the proposed project would contribute to the alleviation of a “jobs rich/housing poor” condition in the Los Angeles subregion (p. IV.L-22). However, the “proposed” project includes no assurances that any of the project’s 2,923 new residents would be employed locally, nor that any of the project’s 1,135 new units would be affordable to current employees of the Port or other nearby institutional or private employers.

A8-15

9) The discussion of Public Services-Schools impacts concludes that, based upon LAUSD estimates, sixty-eight (68) children residing in the “proposed” project are expected to attend Dodson Middle School in the City of Rancho Palos Verdes at any given time (Table IV.M-8). Although LAUSD may represent the Dodson campus as being well under capacity, it is the City’s and the surrounding residents’ actual experience that the current level of enrollment at Dodson results in significant noise, traffic and other nuisance impacts (i.e., trash, graffiti, etc.) in the surrounding *Rolling Hills Riviera* neighborhood. We suspect that the addition of even sixty-eight (68) more students to the campus population will have significant adverse impacts upon the *Rolling Hills Riviera* neighborhood.

A8-16

10) The discussion of Public Services-Recreation impacts concludes that the impact of the “proposed” project will be less than significant as the result of the payment of Quimby fees to the City of Los Angeles, and the provision of 4.1 acres of publicly-accessible parks and open space, and 16.5 acres of private parks, landscaping and recreational amenities. The City of Rancho Palos Verdes respectfully notes, however, that the nearest public park to the project site is

A8-17



Erin Strelch  
 7 January 2013  
 Page 6

Rancho Palos Verdes' Eastview Park, located at 1700 Westmont Drive (Figure IV.M-4). The payment of Quimby fees to Los Angeles will do nothing to offset impacts to nearby Rancho Palos Verdes park facilities from future project residents. Furthermore, since Alternatives C and D no longer contain a public park, we believe that the project's off-site recreational impacts will be significant and should be more fully assessed in the DEIR.

A8-17  
 (Cont)

11) The discussion of Transportation and Traffic impacts (Section IV.N) raises several issues of concern to the City:

a) Vehicular access to and from Mary Star of Sea High School will be maintained through the project site, but will be shifted from its current access point at the Green Hills Drive intersection to the Avenida Arrenda intersection. A queue analysis needs to be conducted to justify the appropriate increase to the existing left-turn pockets on Western Avenue at the Green Hills Drive and Avenida Arrenda intersections.

A8-18

b) The project is proposing left-turn signal phasing at the intersections of Western Avenue at Green Hills Drive and Avenida Arrenda as a project feature. Prior to approval, the applicant must provide justification for appropriate left-turn phase sequencing to maximize operational benefits while minimizing safety impacts.

A8-19

c) On page 55 of the traffic study, the reports states that certain improvements have been implemented along Western Avenue as a result of the Western Corridor Improvement Project Plan. To date, none of the improvements, as recommended by this study, have been implemented.

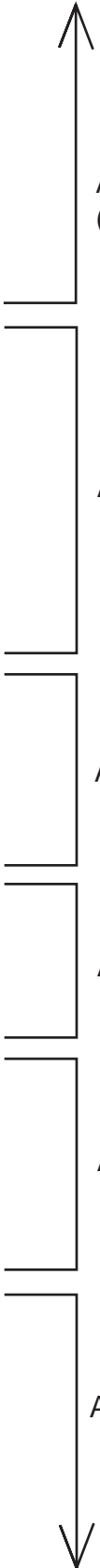
A8-20

d) Removal of the raised concrete median at various intersections along Western Avenue poses a huge safety concern. There is existing evidence of operational issues at many of these intersections, especially the left-turn movements. Removing the raised concrete median nose opens the opportunity for other safety-related concerns. Please provide an alternative to striping for safety purposes.

A8-21

e) The City is concerned about the retention of the wide northbound No. 2 lanes that invite motorists to create a third travel lane. With the project distributing and attracting approximately 60% of the project trips from the north and approximately 30% of project trips from the south along Western Avenue, there is a potential for many vehicles to attempt to avoid the

A8-22



Erin Strellich  
 7 January 2013  
 Page 7

traffic in the striped travel lanes and utilize the wide shoulder area to create a third lane. This pattern exists today.

A8-22  
(Cont)

12) It is the City's understanding that the conveyance of wastewater from the "proposed" project will be via a connection to the City of Los Angeles' sewer system within the right-of-way of Taper Avenue (p. IV.O-25), not via the former connection to the Los Angeles County Sanitation Districts' Western Avenue Pumping Plant (WAPP) in the City of Rancho Palos Verdes. We presume that this will also be the case in any of the alternatives to the "proposed" project. The City of Rancho Palos Verdes is concerned that any proposal or alternative that might continue to utilize the former WAPP connection for this site could place a burden upon the County sewer system that serves the City's residents.

A8-23

13) The DEIR identifies significant unavoidable impacts in the areas of operational air emissions and construction-related air quality, noise and vibration impacts (p. V-1). Residents in Rancho Palos Verdes' *Rolling Hills Riviera* neighborhood are likely to feel the brunt of these impacts, being the nearest single-family residential neighborhood to the project site. It hardly seems equitable that the City of Los Angeles will reap the benefits (if any) of the "proposed" project while the residents of the City of Rancho Palos Verdes will be forced to live with its day-to-day impacts upon their lives.

A8-24

14) The discussion of Alternatives to the Proposed Project (Section VI) raises several issues of concern to the City:

a) As mentioned in Comment 1 above, the City of Rancho Palos Verdes is concerned that the DEIR primarily analyzes the impacts of a "proposed" project that the project proponent is not interested in pursuing, and provides only a cursory assessment of the developer's preferred proposal(s) in the discussion of alternatives. We believe that this approach is needlessly confusing and does not serve to improve the transparency of the development review process for the *Ponte Vista* project.

A8-25

b) With respect to Alternatives A and B, the City of Rancho Palos Verdes is dismayed to learn that it would be the project proponent's intent to revoke the access currently provided to Mary Star of the Sea High School under these development scenarios. We believe that this simply a mean-spirited attempt by the project proponent to diminish the feasibility and community acceptance of these alternatives to the "proposed" project.

A8-26



**Erin Strellich**  
**7 January 2013**  
**Page 8**

- c) With respect to Alternatives B, C and D, the City is similarly dismayed to learn that it would be the project proponent's intent to eliminate the public park and other publicly-accessible site amenities under these development scenarios. As mentioned above, we believe that the elimination of the public park from the "proposed" project will have adverse impacts upon Rancho Palos Verdes' Eastview Park.

A8-27

Again, thank you for the opportunity to provide comments on this important project. 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*.

Sincerely,



**Kit Fox, AICP**  
Senior Administrative Analyst

cc: Mayor Brooks and City Council  
Carolyn Lehr, City Manager  
Carolynn Petru, Deputy City Manager  
Joe Buscaino, Los Angeles City Councilman  
Northwest San Pedro Neighborhood Council

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-9140  
FAX: (213) 897-1337



*Flex your power!  
Be energy efficient!*

January 7, 2013

Ms. Erin Strellich  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA, 90012

**Re: Ponte Vista Project**, ENV-2005-4516-EIR  
Draft Environmental Impact Report  
IGR#121116/EA, SCH#2010101082  
Vic: LA/213/2.00 – 5.00, LA-110/1.00 – 4.00

Dear Ms. Strellich:

The California Department of Transportation (Caltrans) has reviewed the Transportation and Traffic section of the Draft Environmental Impact Report (DEIR) prepared for the proposed Ponte Vista development. The proposed project consists of the development of a residential community comprised of 1,135 dwelling units featuring a combination of for-sale and rental single-family homes, duplexes, townhomes, and flats. The proposed project site location is the former U.S. Navy San Pedro Housing complex and is bordered by Western Avenue (State Route 213) to the west.

A9-1

Based on the traffic information included in the DEIR, we have the following comments:

The proposed project is estimated to generate approximately 7468 average daily weekday trips with 570 occurring during the AM peak hour and 700 during the PM peak hour. As these trips are distributed and assigned to the surrounding roadway network, they are projected to significantly impact various intersections along Western Avenue (State Route 213) and Pacific Coast Highway (State Route 1). The traffic study report recommends mitigation improvements on Western Avenue at the following intersections: Lomita Avenue (TRANS-3), Pacific Coast Highway (TRANS-4 and TRANS 15), Palos Verdes Drive North (TRANS-5), Peninsula Verdes Drive (TRANS-6), Fitness Drive (TRANS-7), Westmont Drive (TRANS-8), Capitol Drive (TRANS-9), Summerland Avenue (TRANS-10).

A9-2

Caltrans concurs with most of the proposed mitigation improvements. However, we do not concur with the proposal to install a traffic signal at Western Avenue and Fitness Drive (TRANS-7) intersection. AASHTO recommends a minimum distance of 400 meters between signalized intersections for proper synchronization. Therefore, Caltrans requests that this intersection is STOP controlled at the westbound approach allowing right-turn inbound, right-turn outbound and southbound left-turn inbound (no left-turn movement from project). Thus, one lane shall be provided for inbound project traffic and one lane shall be provided for outbound project traffic (one right-turn lane).

A9-3

Caltrans has studied the intersection at Western Avenue and Wesmont Drive (TRANS-8) and requests the following additional improvements:

A9-4

- Reconfiguring the westbound approach to provide additional storage capacity for left-turn demand.
- Modify signal phasing to “opposite phasing” for Westmont Drive/Delasonde Drive approaches.
- Removal of southerly pedestrian crosswalk.
- Optimizing signal cycle split and westbound right-turn signal phase overlap.

A9-4  
(Cont)

At Western Avenue and Peninsula Verde Drive (TRANS-6), please condition the project to provide one inbound and two outbound lanes for westbound access approach. Provide full vehicular access (i.e., left-turn and right-turn ingress and egress turning movements) to and from the project. Widen Western Avenue on the project frontage to accommodate an additional lane on the northbound approach. Additionally, please condition the project to widen Western Avenue along the property frontage north of the Green Hills access to provide for one acceleration lane. This improvement will facilitate the westbound right-turn movement, and more important, enhance the safety of bus movement.

A9-5

For access to the project site, we request that Westmont/Taper be a full signalized access intersection to the new proposed development (not to be restricted). Stripe each approach of Western Avenue to provide an exclusive left-turn lane and a shared through plus right-turn lane.

A9-6

We concur with proposed mitigation improvement to install a new traffic signal at Figueroa Place/I-110 Southbound Off-ramp, north of Anaheim Street (TRANS-16b).

A9-7

We do not concur with the proposal to modify the southbound approach on Figueroa Street at the Harbor Freeway northbound On-Ramp to accommodate a right turn only lane (TRANS-17a). Please change TRANS-17b to read “Adjust the median to accommodate additional left-turn lane” and eliminate southbound left-turn movement pocket.

A9-8

Caltrans recommends the following additional mitigation improvements to Western Ave (SR-213) within the study area:

- Restriping of an exclusive right turn lane on Western Avenue at the **northbound** and to the intersections with Westmont Ave, Toscanini Drive, Trudie/Capitol Drive, Park Western Drive, Crestwood Street, and Weymouth Drive.
- Restriping of an exclusive right-turn lane on Western Avenue at the **southbound** approach to the intersections with Westmont Ave, Toscanini Drive, Trudie/Capitol Drive, Crestwood Street, Summerland and Weymouth Drive.

A9-9

Regarding possible transportation impacts during construction, please limit construction-related trucks trips to off-peak commuting periods. In addition, we request an opportunity to review traffic management plans for temporary lane closures associated with implementation of all proposed improvements on the state highway system.

A9-10

As you are aware, Western Avenue remains in the State Highway System as SR-213, all modifications to it will require Caltrans approval. Multiple encroachment permits may be necessary to implement all proposed and recommended improvements. All modifications on State facilities must meet State standards and specifications. As a responsible agency during the CEQA environmental review, we are available to cooperate with the City of Los Angeles (lead agency) to further refine mitigation measures

A9-11

on the State Highway System. You may contact the undersigned to schedule a meeting at your earlier convenience.

A9-11  
(Cont)

In conclusion, future traffic from the proposed "Ponte Vista" would impact State Highway System in the vicinity, mainly Western Avenue and Pacific Coast Highway. However, with the recommended mitigation improvements in the traffic study plus our recommended mitigation measures as indicated above, the project would satisfactorily address its transportation impacts and possibly improve traffic flow on the State Highway System. If the proposed and recommended mitigation measures cannot be implemented for any reason, it is requested the project contribute its fair share to the funding of them according to appendix "B" of Caltrans' Guide for Preparation of Traffic Impact Studies.

A9-12

If you have any questions regarding these comments or wish to schedule a meeting, you may contact Elmer Alvarez, project coordinator at (213) 897 – 6696 or by e-mail at [Elmer\\_Alvarez@dot.ca.gov](mailto:Elmer_Alvarez@dot.ca.gov). Please refer to our internal record number 121116/EA.

Sincerely,



DIANNA WATSON  
IGR/CEQA Program Manager  
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse





# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON CHAN  
Chief Engineer and General Manager

January 7, 2013

Ref. File No: 2408258

Ms. Erin Strelch, Planning Assistant  
Environmental Analysis Section  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strelch:

### Ponte Vista Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 9, 2012. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

- 1. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts' buildover procedures and requirements, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, and click on Buildover Procedures. For more specific information regarding the buildover procedure, please contact Mr. Ronnie Burtner at extension 2766. A10-1
- 2. The Introduction of the Ponte Vista Development EIR Sewer Report states "the Project's sewerage option to the existing LACSD infrastructure in Western would be contingent upon the Project's successful annexation into the LACSD district boundaries". Please note the entire project area is located within the jurisdictional boundaries of District No. 5. A10-2
- 3. The wastewater flow originating from the proposed project discharging directly to the Los Angeles City Bureau of Sanitation's 8-inch gravity sewer main located in Taper Avenue adjacent to the Project's eastern boundary will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works. A10-3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR: ar

c: R. Burtner



DEPARTMENT OF THE NAVY  
NAVAL WEAPONS STATION SEAL BEACH  
800 SEAL BEACH BOULEVARD  
SEAL BEACH, CA 90740-5607

Comment Letter No. A11

IN REPLY REFER TO

5090

Ser N45W/002

4 JAN 2013

Ms. Erin Strellich, Planning Assistant  
City of Los Angeles  
Department of City Planning  
Environmental Analysis Section  
Attn: Case#: **ENV-2005-4516-EIR**  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012-3243

Dear Ms. Strellich:

The United States (through the Department of the Navy) is the former owner of land proposed for development as described in the Ponte Vista Project Environmental Impact Report (EIR), #ENV-2005-4516-EIR. The land in question is located at 26900 South Western Avenue, Los Angeles, CA 90732. The Navy owns property immediately north of the subject parcel. The Defense Logistics Agency (DLA) operates the Defense Fuel Support Point (DFSP) San Pedro, by contract with United Paradyne Corporation, on the adjacent Navy property.

A11-1

We appreciate the opportunity to comment on this document. In the course of our review, we identified a few areas of concern with the EIR including air quality, geology, land use, and hazards and hazardous materials.

The Air Quality Section at page IV.C-2 is missing volatile organic compounds (VOCs) in the list of criteria air pollutants. VOCs should be a part of this list. In the *Emissions* section, please include a table of expected emissions results and regulatory limits for emissions. Also, Table IV.C-8 on page IV.C-37 should add the actual calculation for architectural coatings rather than dividing by three and evenly distributing the estimated peak daily construction emissions across the three phases of construction.

A11-2

The Geology Section, beginning on page IV.F-1, appears to address below grade petroleum in the form of tar and possibly fuel. The depth of this fuel material is not indicated. Also, consideration should be given during design of the project to the fact that there is perched water at a 17-foot depth. Of particular concern is that the clay layer is the perched layer. Assuming the development is ultimately completed, the discharge of water through plant watering will increase significantly.

A11-3

A11-4

4 JAN 2013

This may cause a rise in the perched water, both in elevation and in its areal extent. Drainage of the perched water should be considered prior to any development. The perched groundwater and the sloping of the formation should be mapped to further evaluate the landslide potential.

A11-4  
(Cont)

Final grading information should be provided in this document. There is a statement that all existing fill is uncertified and shall be excavated. This would constitute a significant alteration from the site's current topography. There is an alternative proposed that would not involve removing the fill, but which would instead use deep foundations. We recommend this alternative be removed from the compliance measures list to eliminate the uncertainties associated with the fill. If the project chooses to retain the existing, uncertified fill, special project design features should be addressed to account for this uncertainty. The project also did not address the pressure imposed by the tank farm located immediately to the north of the project site, especially during potential fill excavation.

A11-5

If the impacts related to the fault rupture and displacement would be considered *significant*, a design consideration with respect to geology is essential. Liquefaction potential is only very low if the fill is removed.

A11-6

Page IV.F-29 Sedimentation and Erosion Section indicates that there will be no cut-and-fill; however, there would be fill material removal adjacent to DFSP. Please address how this would impact erosion and how any erosion can be mitigated. Since this section says the site would be reconfigured and reengineered, specifics on how this would be done, and how this would avoid significant impacts, should be included. Page IV.F-30 Conclusion - The set-back zone from the projected active fault is not listed in the compliance measures. Project Impacts under Sedimentation and Erosion- The extended Build-out plan allows for any new evidence to be revealed and this information could be used to modify the restrictions set on the construction permit.

A11-7

A11-8

A11-9

The section on Land Use overlooks the fact that our installation is primarily a bulk fuel storage facility that contains several large underground fuel tanks immediately adjacent to this proposed development. Page IV.J-17 the first paragraph describes DFSP as a fuel and oil storage facility and indicates this is a passive activity. *Passive* is not an accurate term to describe the activities at DFSP since

A11-10

4 JAN 2013

transportation of fuel does occur via pipelines and tanker trucks. The City of Los Angeles' land use map indicates our facility as vacant land instead of a highly industrial operation (reference Figure IV.J-2). This EIR fails to adequately correct this misunderstanding between the current land use and the City of Los Angeles Zoning of the area. The Navy land is completely covered with tanks and piping for bulk fuel distribution. It just happens that most of these tanks and piping are underground. This land should not be considered *industrial open space* (ref. pg. IV.J-17) since it is encumbered with industrial operations and its visual appearance is deceptive. Page IV.J-17 last few sentences of the first paragraph address odors but there is no reference to which section addresses the constituents and potential impacts of these odors. If the constituents of the odors are addressed in the air quality section, please reference them, and if not please include a discussion within the Air Quality Section. The hazards and hazardous materials section has a discussion on VOCs on page IV.H-23 & 24 but does not directly address the odors discussed in the land use section. Page IV.J-17 the second paragraph indicates a less than significant impact is expected with respect to land use compatibility; however, other residential developments could be considered to be "buffered" since they are not immediately adjacent to DFSP, and do not appear to be at a lower elevation than DFSP and therefore these other residential developments may not provide valid comparisons for the proposed project in terms of potential significant impacts with respect to land use compatibility. The grade change and potential course for a fuel spill should be addressed and perhaps establish a "fuel spill buffer zone."

A11-10  
(Cont)

A11-11

A11-12

A11-13

The Hazards and Hazardous Materials Section makes conclusions about the project site hazardous materials impacts without first exploring in the text the data referenced. The conclusion that "any exposure of future residents to groundwater is unlikely to occur" is not the same as saying there is no contamination of the groundwater. The Geology Section of this EIR stated vapors and tar/oil type material were encountered and references this section to clarify the issue. However this section does not adequately address the issue of potential fuel in the perched groundwater. Nothing is stated as to a mitigation measure if petroleum products are encountered during construction. Furthermore, basic documents from the California State Water Board Geotracker Database of contamination and clean-ups are not referenced, nor are documents available from that web site cited, specifically in relation to DFSP fuel tank #4 immediately adjacent to the subject property. This type of

A11-14

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tank release is more possible than human error caused releases, which is stated on page IV.H-34. We don't believe that using the fact that the property was previously residential is a valid argument for this proposed layout since previously the housing on this property was military, and there is a difference in acceptance of risk by military verses public occupants. Also, military personnel would have been adequately prepared to respond and evacuate in the event of a fuel spill. Page IV.H-35 - Given that there are multiple tanks and some are immediately adjacent to the proposed development site, we don't think the assumptions regarding the zone of impact for a potential fuel spill are accurate, nor take into account the potential for the zone of impact to be larger given the site's topography. Also, the vegetation would be an additional fire fuel source that could potentially propagate a fire and further increase the zone of impact.

A11-14  
(Cont)

A11-15

The sponsoring developer told the Navy they were proposing to develop 811 units. Now in this document it states 1,135 units total. This is a significant difference and places several thousand people immediately adjacent to our highly industrial facility. We are concerned this document does not adequately evaluate the potential hazard to this future community.

A11-16

If you have any questions or comments, please contact Lisa Ellen Bosalet, NEPA/Cultural Resources Manager, at (562) 626-7637, or Lisa.Bosalet@navy.mil.

Sincerely,



M. H. HARDY  
Captain, U. S. Navy  
Commanding Officer

Copy to:  
Defense Logistics Agency  
8725 John J. Kingman Road  
Fort Belvoir, Virginia 22060-6221



# 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: January 4, 2013  
erin.strellich@lacity.org

January 4, 2013

Ms. Erin Strellich  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

## **Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Ponte Vista Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (Final EIR) as appropriate.

The AQMD staff is concerned about the significant operations related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for VOC's, NOx and CO emissions during operation of the proposed project. Therefore, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following mitigation measures in addition to the measures identified in the Draft EIR.

### Energy Efficiency

- a. Require the project site to include a solar photovoltaic or an alternate system with means of generating renewable electricity

### Transportation

- b. Require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.
- c. Provide incentives to encourage public transportation.
- d. Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.

A12-1

A12-2

Ms. Erin Stelich

2

January 4, 2013

Other

- e. Provide outlets for electric and propane barbecues in residential areas.
- f. Require use of electric lawn mowers and leaf blowers.
- g. Require use of electric or alternatively fueled sweepers with HEPA filters.



A12-3

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency 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.



A12-4

Sincerely,

Cheryl Marshall  
 Program Supervisor, Toxics Rules  
 Planning, Rule Development & Area Sources

CM:DG

LAC121109-04  
 Control Number



**DEFENSE LOGISTICS AGENCY  
HEADQUARTERS  
8725 JOHN J. KINGMAN ROAD  
FORT BELVOIR, VIRGINIA 22060-6221**

January 4, 2013

Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Attn: Erin Strellich, Planning Assistant  
Los Angeles, CA 90012

Dear Ms. Strellich,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report for the Ponte Vista Project (ENV-2005-4516-EIR) dated November 8, 2012. As you may be aware, the Defense Logistics Agency (DLA) is the primary tenant on the Navy's property at 3171 North Gaffey Street, north and adjacent to the proposed Ponte Vista development. DLA is responsible for operations and maintenance of the Defense Fuel Support Point (DFSP) San Pedro, which is a Department of Defense fueling point. Industrial operations occur twenty-four hours a day, seven days a week at DFSP San Pedro. The DLA and the Navy have been proud members of your community for over 70 years.

The DLA has concerns with some of the assumptions in the report and the proposed residential land use. In order to ensure that you have all of the information needed to make your decision, we believe it would be helpful to begin a discussion of this report. As an example, the report designates DFSP San Pedro as "open space." In fact, DFSP San Pedro is an industrial site and would be more accurately designated as such.

My staff is available if you would like to discuss the DLA's comments. Please contact Mr. Norman Stiegler at (703) 767-9284 or [norman.stiegler@dla.mil](mailto:norman.stiegler@dla.mil).

Sincerely,

DAVID RODRIGUEZ  
Director, Installation Support *ACTING*

Enclosure

cc:  
LCDR Chad Lorenzana, NWSSB  
David Baillie, Environmental Manager, NWSSB  
LtCol Gaffney, USAF, Commander, DLA Energy Americas West  
Don Pollack, DLA Counsel-Energy

A13-1



**Defense Logistics Agency's  
Comment/Response Matrix**

**December 20, 2012**

*Draft Environmental Impact Report (EIR) No. ENV-2005-4516-EIR, dated November 8, 2012  
Ponte Vista Project*

#	Page	Section/ Line	Comment	
1.	86	I – Introduction, Table I-1	<i>Adopted Emergency Response Plan</i> – The Defense Fuel Support Point (DFSP) San Pedro evacuation route is through Gate 9 on Western Avenue. The project's emergency response plan should address any potential impacts.	A13-2
2.	84	I – Introduction, Table I-1	<i>Off-Site Release of Hazardous Materials (Fuel Support Point)</i> – The EIR considers any spill from DFSP San Pedro as less than significant because the project site is beyond the zone for a medium sized spill. The assumptions used for the risk assessment should be the same as those used in the risk assessment in the DFSP San Pedro Oil and Hazardous Substances Integrated Contingency Plan (OHSICP). Recommend the EIR use the OHSICP and Consolidated Contingency Plan in the evaluation. The OHSICP and Consolidated Contingency Plans are available at the DFSP San Pedro library for reference.	A13-3
3.	1-70	IV.B Aesthetics and Visual	As acknowledged in the EIR, the Ponte Vista development will be immediately adjacent to the DFSP San Pedro, a Department of Defense (DoD) fueling point. Currently the fuel is stored in underground storage tanks and bulk field constructed underground storage tanks. As the tanks and infrastructure age, there may be a need to replace the tanks. At that time, aboveground storage tanks will be required to be installed in accordance with the DoD's Unified Facilities Criteria. At such time the visual and aesthetics of the adjacent property will change. Recommend the EIR consider this in the evaluation.	A13-4
4.	38-41	IV.C Air Quality	Local air quality impacts did not take in to account ecological receptors. Please note that the Palos Verdes Blue Butterfly, a Federally endangered species, is found on DFSP San Pedro. If mitigation measures for dust control are not properly implemented IAW SCAWMD rule 403, there could be an impact to the butterfly. The closest habitat area is 600 feet from the Ponte Vista property boundary.	A13-5
5.	28 and throughout document	IV.F Geology and Soils	The EIR does not adequately address the impact of the Ponte Vista project on the north slopes adjacent to the US Navy property. As the US Navy property is an active industrial area, the project could impact the hillside stability with the consequence of damaging petroleum tanks and pipelines. These consequences need to be addressed in the EIR.	A13-6
6.	28 and throughout	IV.F Geology and Soils	The EIR does note the steep slope between DFSP San Pedro and the new Ponte Vista development. The EIR also states "this slope would be completely reconfigured and	A13-7

#	Page	Section/ Line	Comment
	document		reengineered as part of the Project". Please note that the property line between DFSP San Pedro and Ponte Vista meanders up and down the slope parallel to the terrace drains. Any modifications to the hillside would require close coordination with the Navy and DLA to prevent damage to facilities infrastructure within the hillside.
7.	1-45	IV.H Hazards and Hazardous Materials	<p>The EIR states a Risk Management Plan had not been filed with the City of Los Angeles Fire Department so certain assumptions were used to develop the hazard analysis for DFSP San Pedro. Please note that DFSP San Pedro is not required to prepare a Risk Management Plan but is required and does have on file an Oil and Hazardous Substances Integrated Contingency Plan and a Consolidated Contingency Plan.</p> <p>The assumption used by Arcadis G&amp;M for the risk assessment used was 210 gallons from a pipeline. The assumptions used for the risk assessment should be the same as those used in the risk assessment in the DFSP San Pedro Oil and Hazardous Substances Integrated Contingency Plan (OHSICP). The OHSICP and Consolidated Contingency Plans are available at the DFSP San Pedro library for reference.</p>
8.	1-57 (General)	IV.I Hydrology and Water Quality	<p>The EIR recognizes that part of the DFSP San Pedro stormwater is currently being captured and managed on the 61 acre parcel for the Ponte Vista development. It also recognizes that the new stormwater infrastructure will continue to accommodate the DFSP San Pedro stormwater. The design will account for the current stormwater runoff calculated using open space with 1% impervious surface. Please note this assumption may not remain the same with future development on the site. DFSP San Pedro projects that might increase impervious surfaces include road, parking area and loading area renovations, conversion to above ground storage tanks, security lighting and upgrade of security fencing with patrol roads.</p>
9.	1-57 (General and Figure IV.J)	IV.J Land Use and Planning	<p>We (DLA) need to have the land use designation correctly identified on all city/county plans/drawings.</p>
10.	1-57 (General and Figure IV.J)	IV.J Land Use and Planning	<p>The EIR does recognize that the current <i>Wilmington-Harbor City Community Plan</i> inappropriately designates the DFSP San Pedro as open space "despite it containing an active industrial facility". Yet, the EIR considers this insignificant. We disagree with this statement. The EIR further states, "the <i>Wilmington-Harbor City Community Plan's</i> overarching residential goal is to provide a safe, secure and high quality residential environment for all economic, age, and ethnic segments of the community." Placing a residential community adjacent to an industrial fuel facility may not be compatible land use.</p>

A13-7 (Cont)

A13-8

A13-9

A13-10

A13-11

A13-11  
(Cont)

A13-12

A13-13

A13-14

A13-15

#	Page	Section/ Line	Comment
11.	34	IV.J Land Use and Planning	<p>Request the EIR look further into the compatible land use issue while acknowledging the 24 hour a day, seven day a week industrial operation adjacent to the property.</p> <p>The EIR states the <i>Wilmington-Harbor City Community Plan</i> will be monitored and revised in light of changing circumstances resulting in eight specific environmental impacts :</p> <p>“Protection of residents from noxious environmental impacts of industrial activities (p 1-6);... possible environmental impacts from a variety of industrial uses and DWP facilities located nearby (p. 1-8); ... and eliminate incompatible and non-conforming [commercial and industrial] uses from existing neighborhoods, to preserve the residential character of these neighborhoods and protect residents from environmental impacts from such uses (p. III-5).”</p> <p>Given these reasons to look at land use designations and the <i>Community Plan</i> it is unclear how the EIR can determine that the residential community next to an industrial facility are compatible land uses.</p>
12.	1-57 (General)	IV.J Land Use and Planning	<p>The EIR compares the Ponte Vista project characteristics to the <i>Wilmington-Harbor City Community Plan</i> Policies. Goal #9 is to protect the community through a comprehensive fire and life safety program. The current emergency evacuation route for DFSP San Pedro is through Gate 9 on Western Avenue. The EIR does not evaluate any potential impacts of a DFSP San Pedro evacuation on the Ponte Vista residents.</p>
13.	1-34 (General)	IV.K Noise	<p>The section of the EIR that evaluates noise impacts focuses on noise produced during construction of the community. It does not take into consideration the noise that may come from the DFSP San Pedro 24 hour a day, seven day a week operation. The truck loading facility is on the opposite site of the DFSP San Pedro from the Ponte Vista development but this should be addressed in the EIR.</p>
14.	Page #52	Project Open Space Areas (Public Park/Open Space):	<p>The EIR analyzes four alternatives:                      (1) <b>Alternative A</b> (unmaintained) Project does not include public park/open space.                      (2) <b>Alternative B</b> Project does not include public park area.                      (3) <b>Alternative C</b> Project does not include public park area.                      (4) <b>Alternative D</b> Project Components 7.1 acres of dedicated park area.</p> <p>The DLA is concerned with security between DFSP San Pedro and the Ponte Vista development depending on which alternative is selected. If Alternative A is selected and the existing housing is demolished and not developed, this area may become a refuse or used by criminals or other activities. Recommend implementing security around the area if this alternative is selected. If Alternative D is selected and a 7.1 acre park area is developed there are concerns with the protection of DFSP San Pedro after dark. The DLA would recommend closing the park between 1800 and 0600 daily and patrolling routinely</p>

#	Page	Section/ Line	Comment
15.	General	IV.N Transportation and Traffic Impact:	<p>throughout the night.</p> <p>The EIR states:</p> <p>“Existing construction traffic would cause less than significant impact at all of the 56 study intersections during the weekday morning peak hour, weekday afternoon peak hour, and the Saturday mid-day peak hour. This will impact the intersection of Western Ave/Gaffey St/Anaheim St. Impacts the intersection of Gaffey St and Westmont Dr.”</p> <p>“In the Near-Term-Cumulative-With-Project Conditions the project would create a significant impact at <b>15</b> of the 56 study intersections during the weekday morning peak hour, weekday afternoon peak hour, and/or the Saturday mid-day peak hour. This will have significant impacts to the intersection of Vermont Avenue/Palos Verdes Drive North/Gaffey Street/Anaheim Street.”</p> <p>“In the Future Cumulative With Project (2017) the Project would create a significant impact at 20 of the 56 study intersections during the weekday morning peak hour, weekday afternoon peak hour, and/or the Saturday mid-day peak hour. This will impact the intersection of Western Ave/Gaffey St/Anaheim St. Impacts the intersection of Gaffey St and Westmont Dr. Impacts the intersection of Gaffey Street/Summerland Avenue</p> <p>The DLA is concerned about these significant transportation impacts and the potential they could have on the DFSP San Pedro operations.</p>

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

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12/24/12  
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**RECEIVED**  
NOV 27 2012

November 21, 2012

STATE CLEARING HOUSE

Erin Strelch

**City of Los Angeles City Planning Department**

200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: SCH#2010101082; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "ENV-2005-4516-EIR / Point Vista Project;" located in Port of Los Angeles area; City of Los Angeles; Los Angeles County, California

Dear Erin Strelch:

The NAHC is 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.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s 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 advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously.

A14-1

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).

A14-2

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 California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

A14-2  
(Cont)

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.'

A14-3

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.

A14-4

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.

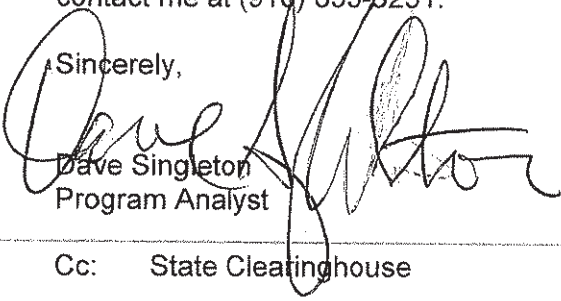
A14-5

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) 653-6251.

A14-5  
(Cont)

Sincerely,



Dave Singleton  
Program Analyst

---

Cc: State Clearinghouse

Attachment: Native American Contact List



# Northwest San Pedro Neighborhood Council

"Your Community Voice"

**Diana Nave**  
President

**George Thompson**  
Vice President

**Scott Allman**  
Treasurer

**Katie Marrie**  
Secretary

January 7, 2013

Erin Strelch  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

## **NORTHWEST SAN PEDRO NEIGHBORHOOD COUNCIL COMMENTS ON ENV-2005-4516 DRAFT EIR COMMENTS: PONTE VISTA PROJECT 26900 S. WESTERN AVE, SAN PEDRO**

Dear Erin,

Thank you for the opportunity to respond to the Draft EIR for the proposed Ponte Vista project. As can be seen from the address, the property is located within the community of San Pedro even though it is in the Wilmington Harbor City Community Plan area and is located within the boundaries of the Northwest San Pedro Neighborhood Council (NWSPNC). NWSPNC represent approximately 20,000 residents and numerous businesses and community organizations. At a Special Meeting on January 3, 2013, our Board, by resolution, unanimously adopted the comments contained herein.

A15-1

The NWSPNC has followed and participated in the review of the project since the original proposal was submitted by Bisno Development. The current project was presented by the applicant at our November Board and Community Meeting and their Traffic Consultant presented the traffic study and proposed mitigations at our December Board Meeting. Our Planning and Land Use Committee also met at least three times with their representatives made suggestions during the development of the traffic study.

Just prior to the release of the DEIR we requested a 90-day comment period. We remain frustrated and discouraged by the denial of this request, particularly in light of the fact that the most of the review period was consumed by the Thanksgiving, Hanukkah, Christmas, and New Year Holiday Season. Furthermore, it is our contention that the time for review did not comply with the early warning provision of Charter Section 907, requiring sufficient notice so that

A15-2



Neighborhood Councils will have “...a reasonable opportunity to provide input before decisions are made”. Even more concerning however, is the lack of sufficient opportunity for the community at large to comment on an environmental document for a controversial project that will have such a significant impact on San Pedro, Harbor City and Wilmington.

A15-2  
(Cont)

While this DEIR is an improvement over the document prepared by the previous developer, it is seriously flawed. Furthermore, the project evaluated does not appear to be the project that is proposed to be built. This complicates and skews the review process.

The proposed project does not appear to be a good fit for the community nor for this geographically unique property. We have problems with the underlying assumptions and conclusions in the DEIR mainly relating to traffic, social services, utilities and service systems. Because the analysis is built on faulty assumptions, it is in effect a “house of cards,” and all conclusions based on the analysis are also faulty. We also are concerned with the lack of amenities provided on site, and the lack of any attempt to address the substantial environmental impacts through project design.

A15-3

Among the fundamental deficiencies in the DEIR are the following:

1. The rezoning request will impair the orderly implementation of Regional Plans, City’s General Plan, and two Community Plans. Additionally it fails to evaluate Public Health and Social Impacts and conformance with the ten Urban Design Principles and the Walkability Checklist.

A15-4

2. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single-family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and in the former CRA project are in downtown San Pedro, thereby undermining a major community effort to revitalize this area, the heart of our community.

A15-5

3. The proposed project is not a good fit for the location. It is not in a transit oriented area. The gated community and mix of housing types are not appropriate. The proposal fails to integrate walking, biking, and public transit. If built as proposed, residents would need to use their auto for everything. This over-dependence on cars has Green House Gas, energy, and health implications and would isolate residents who do not drive, eg. kids, elderly, and the disabled, within a gated subdivision. Further, the development would not improve the local jobs housing balance.

A15-6

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------|
| <p>4. Alternatives B, C, and D ignore the present zoning which includes 15 acres of open space. This is an especially egregious oversight in alternate B because it claims to be a “no project” alternative, i.e. buildable as a matter of right. In fact, units cannot be built on that portion of the property zoned as open space.</p>                                                                                                                                                                                                                                                                                                                                                                                        |  | A15-7  |
| <p>5. The traffic analysis uses incorrect assumptions about V/C ratios and traffic generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, that is not related to San Pedro in any way. Further, none of the proposed Alternatives consider on-site features to mitigate mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.</p>                                                                                                                                                                                           |  | A15-8  |
| <p>6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  | A15-9  |
| <p>7. The analyses and proposed mitigations for Greenhouse Gas Emissions, Hazardous Materials, Public Services, and Utilities and Service Systems are inadequate and flawed. They must be revised.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | A15-10 |
| <p>8. The DEIR does not adequately consider the alternatives. It focuses almost exclusively on the 1135 unit project despite identifying Alternative C with 830 units as the environmentally preferred alternative, and inadequately analyzes Alternative B, for 385 units, despite its having even fewer environmental impacts. No meaningful public amenities are proposed. The proposal fails to make a compelling case for why a special exception should be made to allow the applicant more than its share of units allowed by right.</p>                                                                                                                                                                                  |  | A15-11 |
| <p>9. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project while creating an open an accessible neighborhood that represents the values of San Pedro community. We suggest a mixed-use neighborhood project alternative that includes access to Mary Star, traditional single-family homes on appropriately sized lots that allow reasonable private open spaces for families that live in these homes, with work centers, commercial space, senior friendly facilities, a range of public open spaces including a 6-acre public park that complies with the City Recreation Plan, and a library extension to meet State Guidelines for library space.</p> |  | A15-12 |
| <p>The objective of the EIR is to disclose the significant impacts of proposed actions, to identify meaningful alternatives and mitigation measures to avoid or reduce environmental damage, and to enhance public participation in the planning process.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  | A15-13 |

In this case, the DEIR relies on outdated, inaccurate, incomplete, inadequate, confusing, and often misleading information that does not help the advisory- and decision-making bodies make an informed decision. A meaningful alternative to a gated subdivision with no public space would be an open an accessible neighborhood with public open spaces and amenities, not unlike the many wonderful neighborhoods in the San Pedro community -- sadly, this option was not evaluated. Ponte Vista may very well be the last of the largest neighborhoods to be developed in the San Pedro community -- the tone set by this development will resonate in the development of smaller infill and redevelopment sites. It is no surprise that the people of the community want to be involved -- they want to be engaged in a meaningful way. Rather than simply react to one scheme or another they want the project designers to help them shape their vision that is also economically viable and rewarding for the developer who is taking the risk. It is this collaborative manner that we can move beyond just another gated subdivision to create a unique place for San Pedro Community.

It is in no ones best interest to see this land continue to lie fallow. We support the City's efforts to promote economic development and to streamline development review. However, in its current flawed design and environmental documentation, this project has the pote ntial to disillusion neighborhoods towards any growth or economic development -- if this is growth and progress, lesser is better.

Please consider the points raised in this cover letter as comments on the DEIR in addition to the attached comments that follow the order in the DEIR. Thank you for this opportunity to submit our comments and concerns. Contact me at 310-831-1975, if you have any questions.

Diana Nave, President  
Northwest San Pedro Neighborhood Council

Enclosure

CC: Councilman Joe Buscaino  
Olive Reed, President, Harbor City Neighborhood Council  
Cecelia Moreno, President, Wilmington Neighborhood Council  
Linda Alexander, President, Central San Pedro Neighborhood Council  
June Smith, President, Coastal San Pedro Neighborhood Council  
Ponte Vista Development Team

A15-13  
(Cont)

**NORTHWEST SAN PEDRO NEIGHBORHOOD COUNCIL  
COMMENTS ON PONTE VISTA DEIR**

**SECTION II. PROJECT DESCRIPTION**

**C. PROJECT CHARACTERISTICS**

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

A15-14

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

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

A15-15

**Specific Plan Zoning**

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

A15-16

The proposed zoning is vague. For example, the proposed single-family units are not the traditional single-family homes that one finds in an R-1 zone. Rather they are essentially the type of housing found in areas zoned RD 1.5 and higher.

A15-17



The apartment buildings need to have a specific zoning that is applicable to the actual size and density of the proposed development. A Medium density by City of LA codes extends all the way to R-4 zoning which is comparable to the density on Fitness Drive, the 6-acre parcel between the Commercial Shopping Center and the Ponte Vista Property. Figure II-10, Parcel 7 should be zoned specifically for their proposed density, not the medium density. The apartments should be capped at R-3 or lower to provide for an appropriate transition from the development on Fitness Drive to the lower density units directly to the north.

A15-17  
(Cont)

**Private Roads**

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

A15-18

**Open Space**

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

A15-19

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

A15-20

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

A15-21

**Building Heights**

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

A15-22

**D. CONSTRUCTION CHARACTERISTICS**

The DEIR states (II-33) that "the construction of the project is estimated to begin in 2013 and would continue over a five-year period, with completion in 2017." There are many references to this 5-year time frame throughout the DEIR. **Since the**

A15-23

applicant has requested a 15-year Development Agreement, these references should be changed to indicate a 15-year build-out and the construction phase impacts addressed accordingly.

A15-23  
(Cont)

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

A15-24

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

A15-25

E. PROJECT OBJECTIVES

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

A15-26

SECTION III. ENVIRONMENTAL SETTING

B. OVERVIEW OF ENVIRONMENTAL SETTING

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

A15-27

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

A15-28

- o Southern California International Gateway (SCIG)
- o APL Terminal expansion
- o Ports O'Call Redevelopment
- o Cabrillo Marina Phase II
- o USS Iowa
- o Los Angeles County Sanitation Districts Clearwater Outfall Project
- o Rolling Hills Prep School build out from 250 students to 1,000 students
- o VOA Navy Village
- o Pacific LA Marine Terminal
- o Harbor Highlands Development (under construction)
- o City Dock 1
- o Port Master Plan update
- o Marymount College Expansion on Palos Verdes Drive North
- o San Pedro Community Plan update

A15-28  
(Cont)

## G. GREENHOUSE GAS EMISSIONS

### Background

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

The City of Los Angeles has embraced the effort. It adopted “Green L.A.: An Action Plan to Lead the Nation in Fighting Global Warning” in May 2007, in which it proclaims that by 2030 it will reduce GHGs from city operations 35 percent below 1990 levels.

A15-29

Three gases are felt to pose the greatest threat: carbon dioxide, methane and nitrous oxide.<sup>1</sup> The primary cause of GHG pollution is combustion of fossil fuels.<sup>2</sup> In California, fossil fuel use is closely related to motor vehicle use.

Emissions

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

A15-29  
(Cont)

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

A15-30

Proposed "Reductions"

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

A15-31

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

<sup>1</sup> California Technical Advisory: CEQA and Climate Change, June 19, 2008 – hereinafter "Technical Advisory"

<sup>2</sup> Technical Advisory, p. 2

<sup>3</sup> It is curious that the DEIR uses the metric system at this point. A metric ton weighs considerably more than the "short ton" most Americans are used to working with – 2,205 pounds instead of 2,000. Accordingly, 15,620.55 metric tons translates to 17,222 tons of polluting gases.



Emissions from Autos

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

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

A15-32

What is more, the project is not near any major employment center.<sup>4</sup> Nor is that likely to change. The recently drafted San Pedro Community Plan does not anticipate adding any major commercial centers in the area during the next 20 years. In short, residents of the proposed project are likely to have to commute considerable distances by car to work.

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

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

Responsibility

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

A15-33

<sup>4</sup> Despite the fact that the Project is located near the Port of Los Angeles, many of the Port jobs are a significant distance from this site. Furthermore, the San Pedro Community Plan Area has a huge deficit in jobs with a job housing ration of 0.44

of dealing with these pollutants. Only by forcing each project to confront and address the issue properly will there be any hope of reducing GHGs and the threat they pose.

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

See also our comments under Traffic and Transportation.

**H. HAZARDOUS MATERIALS**

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

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

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

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

With regard to the Rancho LPG facility, the DEIR notes that “to a much lesser extent there may be some quantifiable risk of upset from other activities such as product delivery by rail or truck...Based on the worst-case RMP scenario and with the more likely releases having a much smaller radius impact than 0.5 miles, there would be no impact to the project site.” **This analysis under estimates the potential impact to the Project Site, endangering the safety of future residents, with no proposed mitigations.** The US DOT report of butane incidents by Means of Transportation found that there were 751 rail incidents and 13154 truck incidents in 2003 alone. This is far from an insignificant risk. In many respects, it would be far more accurate to say that “it is just a matter of time” before a significant incident occurs.



A15-33  
(Cont)

A15-34

A15-35

In addition, Tosco Refining Company’s Risk Management Plan for what is now the Phillips 66 refinery contains a worst-case scenario (Attachment A) for a butane incident with a 2.3-mile impact, way beyond the Ponte Vista site. An additional proof that the risk is far from insignificant is shown in the linked video showing a 60,000-pound LPG rail tank car being hurled three quarters of a mile once it caught fire.<sup>5</sup>

A15-36

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

A15-37

Evacuation Routes

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

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

A15-38

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

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

A15-39

<sup>5</sup> See [WWW.YOUTUBE.COM/WATCH?V=XF3WKTWHPIU](http://WWW.YOUTUBE.COM/WATCH?V=XF3WKTWHPIU)

that a portion of North Gaffey Street and a portion of Harbor Blvd. are in liquefaction zones), Western Avenue may be the only available evacuation route. San Pedro with the Port operations, storage of hazardous materials, and location on earthquake, liquefaction, and methane zones, is for more apt to need to evacuate than any other location in the City of Los Angeles.

A15-39  
(Cont)

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

A15-40

The “entire city of Rancho Palos Verdes, excluding the portion of the City located east of Western Avenue (approximately 98 acres) is classified as a VHFHSZ [Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection]”<sup>6</sup> and in 2009 alone 2000 residents of RPV were forced to evacuate their homes because of wildfires. For the residents of RPV on the west side of Western, Western Avenue is the only evacuation route available to them. It is not credible to assert that Western Avenue north of Summerland would not be an evacuation route for RPV residents.

A15-41

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

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

A15-42

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

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

A15-43

<sup>6</sup> Safety Element of the City of RPV General Plan, adopted June 2010

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

A15-43  
(Cont)

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

A15-44

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

## J. LAND USE & PLANNING

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

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

A15-45

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

## REGIONAL PLANS

### Regional Transportation Plan

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

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

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

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

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

The Growth Vision is driven by four principles:

1. **Mobility** - Getting where we want to go
2. **Livability** - Creating positive communities
3. **Prosperity** - Long-term health for the region
4. **Sustainability** - Promoting efficient use of natural resources

A15-46

A15-47

A15-48

**Mobility:** The Mobility principle encourages mutually supportive transportation investments and land use decisions. A key strategy is to design complete streets that promote walking, biking, and transit use. There is no discussion at all how the proposed subdivision supports this principle.

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

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

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

**The proposed gated subdivision utterly fails to meet all four principles of the Compass Plan.** The Compass Plan website<sup>7</sup> features many proposed and built development as best practices. None are gated subdivisions.

**Los Angeles General Plan**

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

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

<sup>7</sup> www.compassblueprint.org

A15-48  
(Cont)

A15-49

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

A15-49  
(Cont)

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

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

A15-50

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

A15-51

**San Pedro Community Plan (SPCP)**

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

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

A15-52

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

<sup>8</sup> 2009 Department of City Planning Recommendation Report CPC 200608043-GPA-ZA-SP-DA, Ponte Vista Specific Plan, page F-2.



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

A15-52  
(Cont)

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

A15-53

### Housing Types

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

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

A15-54

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

### Open and Accessible to the Community:

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

A15-55

**Open Space and Public Amenities:**

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

A15-56

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

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

A15-57

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

**Additional Plan Considerations**

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

- o Promote home-based offices
- o Encourage senior friendly facilities.
- o Encourage on site businesses such as a coffee shop or convenience store.
- o 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.

A15-58

The proposed project does not address any of these.

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

A15-59

<sup>9</sup> Draft San Pedro Community Plan, August 2012, page 37

would increase the opportunities for those ‘empty nest seniors’ looking to downsize from large single-family homes while remaining within the community and the reach of supportive social, cultural and family networks.”<sup>10</sup> **The lack of any senior housing in this project would be a significant missed opportunity.**

A15-59  
(Cont)

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

**The proposed project does not meet the fundamental premises of the WHCCP.** The first premise is limiting residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Although the six acres immediately adjacent to the South is multi-family, this is an anomaly. This property was zoned commercial with the expectation that it would be used in such a manner. Unfortunately, the same code allowed the multi-family structures to be erected in a manner that is not compatible with the surrounding community. The surrounding neighborhoods are single family R-1, with the exception of the Gardens that is 13.5 net dwelling units per acre. In fact, according to a recent study, 80% of the land along the Western Avenue corridor (Summerland to Palos Verdes Drive North) is dedicated to single-family residential lots.<sup>11</sup>

A15-60

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

A15-61

The second and third premises are

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

A15-62

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

<sup>10</sup> Draft San Pedro Community Plan, August 2012, page 37.

<sup>11</sup> Western Avenue Corridor Vision, Preliminary Analysis and Ideas, November 14, 2012

residential developments in the 14 years since the WHCCP was developed, **building controls should be put into place until such a study is conducted.**

A15-62  
(Cont)

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

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

A15-63

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

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

A15-64

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

A15-65

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

A15-66

<sup>12</sup> Department of City Planning Recommendation Report CPC 200608043-GPA-ZA-SP-DA, Ponte Vista Specific Plan, page F-3.

watch programs, and regular communication with neighborhood and civic organizations.”

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

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

**LA MUNICIPAL ZONING CODE**

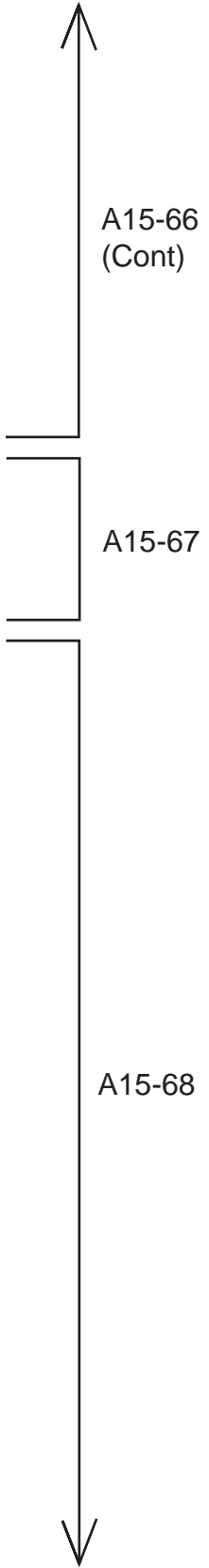
The current R-1 zoning is a combination of R-1 and open space. According to the DEIR, this zoning would permit about 385 units. Alternate C for 830 units would more than double that development intensity, and Alternate D would triple the intensity. This increased intensity would increase demands on existing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

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

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

<sup>13</sup> Blakely, E.J., and M.G. Snyder. (1998). "Separate places: Crime and security in gated communities." In: M. Felson and R.B. Peiser (eds.), Reducing crime through real estate development and management, pp. 53-70. Washington, D.C.: Urban Land Institute.

<sup>14</sup> <http://www.boe.ca.gov/proptaxes/pdf/ah531.pdf>



entrepreneurial profit and adjustments for location where the units are to be constructed. They do not include discounts for multiple units being constructed at the same time however, which would make the cost even lower.

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

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

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

**URBAN DESIGN PRINCIPLES**

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

The ten Urban Design Principles are:

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

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

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

A15-68  
(Cont)

A15-69

A15-70

10. Ensure connections.

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

A15-70  
(Cont)

**WALKABILITY CHECKLIST**

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

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

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

A15-71

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

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

**L. POPULATION AND HOUSING**

**PLAN FRAMEWORK ELEMENT**

**Objectives**

The DEIR indicates that one of the relevant objectives is:

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

A15-72

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

**Housing**

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

A15-73

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

We question the SCAG growth estimates and hence the need for additional housing since the 2010 census actual population numbers are well below SCAG 2005 estimates and projections. The DEIR (IV.L-9) discusses the SCAG Regional Housing Needs Assessment that was developed for the period January 1, 2006 – June 30, 2014. This is an old document. The new version of this document should be used. Furthermore, this old version has been shown to have grossly overestimated the projected growth for Los Angeles in general and San Pedro in

A15-74



particular. For example, the SCAG 2005 population estimate for San Pedro was 82,112; however, according to the 2010 census there are only 76,651 persons in San Pedro, 5,461 fewer. If the 2.5% growth forecast from 2010 through 2017 were applied, this would add 1916 to the population of San Pedro by 2017 still significantly below the 2005 SCAG forecast upon which the housing needs were developed. **Consequently it is in error to conclude that the project will not induce substantial population growth in an area by proposing new homes.**

A15-74  
(Cont)

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

A15-75

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

**M. PUBLIC SERVICES**

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

A15-76

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

This project is being developed in an existing area that currently requires a comparatively limited number of calls for services, therefore, any increase should be considered significant. The project area is currently zoned for R-1 and open space, which would be the ideal 'fit' for the existing neighborhood community and have a minimum negative impact. This describes Alternate B, which has less of an environmental impact than Alternate C, the preferred Alternate.

A15-77

Admittedly determining the anticipated impact of this project on the existing community is purely a speculative process generated by infinite unknowns. Calls for service may result from intentional and accidental human acts and acts of nature, some minor and others more serious or even catastrophic in nature, but all significant to those impacted.

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

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

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

## 1. FIRE PROTECTION

### **The analysis of fire protection and proposed mitigations is inadequate.**

The DEIR states that all **public** street fire lane cul-de-sacs shall have the curbs painted red or be posted “No Parking Any Time” prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.



A15-78  
(Cont)

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A15-80

A15-81

The streets in the project are proposed to be **private** streets, so where will the “public” street fire lanes be? This contradiction should be fixed. Where will the guests park? Please state how the no-parking zones and red curbs will be enforced. What if cars are illegally parked in red zones and in private lanes making it impossible for emergency vehicles to get through?

A15-81  
(Cont)

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

The proposed mitigation states sprinklers will be installed throughout all structures but does not specify if fire sprinklers will be installed inside every residential unit. “The US Fire Administration supports the recently adopted changes to the International Residential code that require residential fire sprinklers in all new residential construction. It is the position of the U.S. Fire Administration that all Americans should be protected from death, injury, and property loss resulting from fire in their residence. All homes should be equipped with both smoke alarms and residential fire sprinklers.”<sup>17</sup> Please clarify the DEIR and address implications if sprinklers are not installed in every residential unit.

A15-82

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

A15-83

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

A15-84

<sup>17</sup> Source: US Fire Administration, June 2009

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

A15-84  
(Cont)

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

A15-85

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

A15-86

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

## 2. POLICE PROTECTION

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

A15-87

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

A15-88

## 3. SCHOOLS

There are several problems with the methodology used for the school impact analysis.

A15-89

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

A15-89  
(Cont)

A15-90

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

A15-91

	Current Students	Ponte Vista <sup>20</sup>	Harbor Highlands	Total	Capacity	Difference
Taper	629	231	27	887	804	83
Dodson	1863	112	13	1988	1892	96
Narbonne	3350	113	0 <sup>21</sup>	3463	3531	(68)

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

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

A15-92

<sup>18</sup> San Pedro Community Plan DEIR p 4.12-31

<sup>19</sup> The Current Students and School Capacity figures were obtained from Bruce Takeguma, Director, LAUSD, School Management Services (213) 241-3344

<sup>20</sup> For Ponte Vista and Harbor Highlands the student generation rate from the San Pedro Community Plan was used.

<sup>21</sup> Although Harbor Highlands will generate 13 students, they would go to San Pedro High School, not Narbonne and therefore are not counted here.

serious traffic tie-ups at both ends of the school day, as well as many unique trips in and out of any development. This is particularly true in San Pedro where a variety of relatives are available to pick up and deliver children to and from school. Mitigations should be proposed to encourage children to walk to Taper and Dodson.

A15-92  
(Cont)

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

A15-93

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

A15-94

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

**4. PARKS and RECREATION**

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

A15-95

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

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

A15-96

<sup>22</sup> See Los Angeles public Recreation Plan page 2 for a complete list.

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

A15-96  
(Cont)

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

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

A15-97

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

**5. LIBRARIES**

The DEIR is not accurate in its assertion that the current San Pedro library, at 20,000 square feet, is adequate size for the population served, and should be adequate to meet the needs of the increased population added by the development. This claim is in conflict with the DEIR for the San Pedro Community Plan that states “The available public library services in the San Pedro CPA, in terms of library space and permanent volume collection, are currently inadequate to meet existing demands from the community’s residents based on state library standards.... of 0.5 square feet per person.”<sup>23</sup> The State of California Library standard requires 0.5 sq ft of library space per resident. For the existing population of 76,651 residents (2010 census data), library space available should 38,325 square feet, nearly double the existing space. Since the project would add nearly 3,000 additional residents, and it would require at least 1500 square feet of additional space.

A15-98

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

A15-99

<sup>23</sup> San Pedro Community Plan DEIR p 4.12-40

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

A15-99  
(Cont)

The Ponte Vista project has an opportunity to mitigate this defect by incorporating a public library into the project. The library should be at least 20,000 square feet to meet State requirements. The San Pedro Community Plan recommends integrating libraries into multi-use buildings. For reference consider the Milwaukee Public Library is moving ahead with development of two multi-use buildings including libraries: one is a proposed 16,000 square foot library topped with 92 apartments (plus parking).<sup>24</sup>

A15-100

The San Pedro Community Plan also suggests that on-line services and virtual libraries with computer workstations that provide access to the library’s on-line catalog, extensive information databases, multimedia software for students, and free Internet searching for the public may lessen the adverse impacts resulting from a mismatch between available physical library space and resources and the community’s need for library facilities.”<sup>25</sup>

**N. TRAFFIC**

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

A15-101

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

A15-102

<sup>24</sup>See <http://urbanmilwaukee.com/2012/02/28/east-library-redevelopment-advances-at-city-plan-commission-renderings/>

<sup>25</sup> San Pedro Community Plan DEIR p 4.12-40



**We have concerns about how the variables were calculated and the accuracy of the LOS results obtained, about the way in which mitigation is determined, and the failure to address how to design the amenities on the site in order to reduce traffic generation. This should be corrected.**

A15-102  
(Cont)

**1. IMPROPER CALCULATION OF THE VARIABLES**

**Improper Use of ITE Traffic Generation Data**

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

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

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

A15-103

Further, each trip generation graph in the ITE Manual includes a wide range of actual trip generation numbers. To select the mid-point is difficult to justify.<sup>26</sup> Had the developer and the City used more appropriate data points within each classification, as they are permitted to do, and admonished to do by ITE itself, the trip-end volume would be 10,862 instead of 7,462. AM peak hour volume would increase from 571 to 851 and PM peak would increase from 669 to 1146. Using these calculations, and using normalized traffic counts, would greatly increase the V/C ratios and lower the LOS ratings at many more intersections among the 56 tested intersections.

A15-104

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

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

A15-105

<sup>26</sup> We suggest that perhaps the traffic problems in other areas of the City and increasingly in San Pedro, Wilmington and Harbor City, can be attributed to this practice of using mid-point calculations rather than more realistic data.

The impact is shown in the DEIR counts in 2010, which are lower than earlier counts taken by the same consultant in 2005 for the prior project, lower than the counts taken for the Target Store analysis in 2006 and lower than many of the counts for the Marymount project on Palos Verdes Drive North in 2011, after the installation of ATSAC/ATCS. For example, the V/C PM ratios for Western and PV Dr. North are

2005	1.025	[Ponte Vista I]
2006	1.078	[Target]
2010	.851	[DEIR, present project]
2011	.872	[Marymount]

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

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

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

**Failure to Include Data from Other Projects**

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

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

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<sup>27</sup> Twenty Foot Equivalent Units, a measure used to normalize cargo counts since not all containers are the same size.



A15-105  
(Cont)

A15-106

- o Los Angeles County Sanitation Districts Clearwater Outfall Project
- o Rolling Hills Prep School build out
- o VOA Navy Village
- o Pacific LA Marine Terminal
- o Harbor Highlands Development (under construction)
- o City Dock 1
- o Port Master Plan update
- o San Pedro Community Plan update
- o Marymount College Expansion on PV Drive North

A15-106  
(Cont)

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

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

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

A15-107

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

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

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

A15-108

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

**Max Line 3** runs from 36th Street and Pacific Ave in San Pedro to LAX Green Line

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

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

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

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

A15-108  
(Cont)

## 2. COMMENTS CONCERNING PROPOSED TRAFFIC MITIGATIONS

### Some Offered Mitigation is Already Proposed by Marymount

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

A15-109

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

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

A15-110

### The Projected Routing for PM Peak Hour Traffic Does Not Seem to Have a Basis

A15-111

We realize that predicting access routing is sometimes an art rather than a science. However, given the very long PM backups at the 110 Freeway off-ramps at Sepulveda, Pacific Coast Highway and Anaheim, coupled with the challenge of making a left turn across Western, it seems likely that in the evening, a large percentage of commuters will exit at Channel Street and proceed north on Gaffey to Channel, Capitol, or Westmont and then west to Western to the project entrances. This assumption is given further credence in that virtually every place a commuter might want to stop on their way home, be it for groceries, dry cleaning, or to pick up a child, is off of either Gaffey or that portion of Western that lies between Channel and Westmont. Further, this commuter traffic will be joined by those residents who are coming home from downtown San Pedro and the San Pedro Waterfront and from Long Beach and points south via the 47. An analysis of all of this traffic should be included.

A15-111  
(Cont)

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

A significant amount of project-generated traffic will be work related traffic. Other components will be taking kids to soccer practice, taking children to school, going to the markets and library, church, etc. Work-related traffic will be especially heavy, and for greater distances than normal, because the project is not really responding to local employment needs.<sup>28</sup> In other words, they are proposing a suburban commuter community.

A15-112

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

**OTHER CONCERNS**

**The DEIR fails to analyze the impact of increased traffic on Western from the 74 driveways and non-signalized intersections on Western between Summerland and Palos Verdes Drive North.** According to a recent study of the Western Avenue Corridor, there are 111 destinations on Western between Summerland and Capital Drive.<sup>29</sup> These grocery stores, post office, dentist offices, coffee shops, banks, etc. are accessed through the driveways. These poorly designed driveways add to the traffic flow problems. For example, the turn lane into the shopping center nearest the project can only accommodate about 4 cars. After that, cars begin impeding the flow of traffic on Western. This is a very unique

A15-113

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

<sup>29</sup> Western Avenue Corridor Vision Preliminary Analysis and Vision, Nov 14, 2012

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

A15-113  
(Cont)

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

A15-114

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

A15-115

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

A15-116

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

A15-117

The DEIR failed to study the Harbor Freeway Channel Street Off-Ramp and the 47 Freeway Channel Street On-Ramp at Miraflores. The impact of increased traffic at this intersection must be studied and appropriate mitigations proposed. In addition, the full intersection including Channel and Gaffey must be re-examined. We are suspicious that the low LOS shown at that intersection was the result of southbound Gaffey traffic backed up at Miraflores and therefore not even entering the Channel and Gaffey intersection. An April 2004 baseline study, for the Port of Los Angeles found this intersection to be at an OS of E during the PM Peak Hour and the Gaffey/Miraflores intersection to be an LOS of F in the AM Peak hour and D in the PM Peak Hour.<sup>30</sup>

A15-118

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

A15-119

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

A15-120

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

A15-121

<sup>30</sup> Port of Los Angeles Baseline Transportation Study, Meyer, Mohaddes Associates. April 2004

take public transportation. This must be added into the traffic study for that intersection.

A15-121  
(Cont)

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

A15-122

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

A15-123

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

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

A15-124

**PUBLIC TRANSPORTATION**

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

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

A15-125

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

The remaining two lines are operated by RPV and are primarily designed to

transport RPV students to RPV schools.

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

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

**O. UTILITIES AND SERVICE SYSTEMS**

**1. WATER**

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

The developer estimates that the 1,135-unit project will use 216 acre-feet per year of water. (p. I-135). That translates to 170 gallons per day per unit. However, that figure is far below what experience has shown constitutes actual use. The United States Environmental Protection Agency has found that the average American household uses 400 gallons per day.<sup>31</sup> In Southern California, where residents may be more sensitive about conserving fresh water, the Los Angeles Department of Water and Power (LADWP) reports that the average single-family residence consumes 359 gallons each day<sup>32</sup>

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

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

<sup>31</sup> “Water Sense,” an EPA Partnership Program at [www.epa.gov/WaterSense/WaterUseToday](http://www.epa.gov/WaterSense/WaterUseToday)

<sup>32</sup> Los Angeles Department of Water and Power, 2010 Urban Water Management Plan [hereinafter referred to as the “UWMP”], p. 43.



A15-125 (Cont)

A15-126

A15-127

A15-128



this area. Rather than waiting for reclaimed wastewater to be available **the developer should be required to plumb the units to provide gray water for irrigation.**

A15-128  
(Cont)

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

A15-129

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

Furthermore, the entire state is facing a water crisis<sup>33</sup>.

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

A15-130

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

<sup>33</sup> <http://www.aquaforia.com/index.php/californias-water-crisis/>

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

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

**2. WASTEWATER**

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

**3. ENERGY**

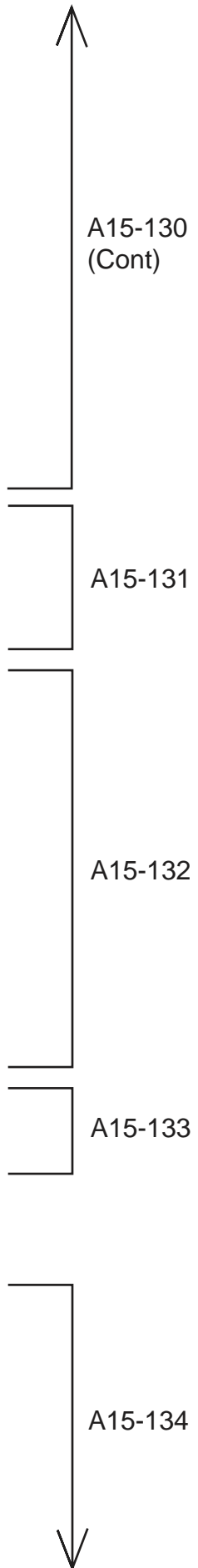
Solar or alternate energy such as Bloom Energy Servers should be required. Currently 39% of the City’s energy comes from coal. This is being phased out. The City’s lease for the Navajo power plant expires in 2019 and the City’s contract for a coal generated plant in Utah ends in 2027. DWP has indicated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

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

**PUBLIC HEALTH IMPACTS**

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

<sup>34</sup> LADWP Presentation on Proposed Rates 2012-2014, Mandates and Reliability



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

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

A15-134  
(Cont)

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

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

A15-135

**SOCIAL IMPACTS**

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

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

A15-136

A neighborhood offers the promise of belonging and call for us to recognize our interdependence. To belong is to be welcome, even if we are strangers. The sense of belonging is important because it leads us from conversations about safety and comfort to our relatedness and willingness to be generous and

hospitable. These elements seldom occur in a culture dominated by isolation, and it correlate, fear.

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

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

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

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

**PROJECT ALTERNATIVES**

The DEIR should analyze at least one additional alternative that better addresses the context of the community and environmental impacts of the project. We suggest a mixed-use project alternative that includes access to Mary Star, with true single-family homes on appropriate sized lots, rather than a PUD, work centers, commercial space, senior friendly facilities, a range of public open spaces including a 6-acre public park, and a library extension to meet State Guidelines for library space.



A15-136  
(Cont)

A15-137

Additionally, given the poor jobs housing balance, it seems remiss that none of the alternatives included a light industrial park. This is particularly true in light of the fact that the original re-use plan for this property would have resulted in significant job creation.<sup>35</sup>

A15-138

**ATTACHMENTS**

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

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<sup>35</sup> According to the Draft EIR for the San Pedro Community Plan, the jobs-housing ratio for San Pedro is 0.44 while it is 1.3 for Los Angeles as a whole.

# ATTACHMENT A

# WORST CASE SCENARIO

## WORST CASE SCENARIO ASSUMPTIONS FOR BUTANE:

- Everything in a refrigerated butane storage tank is released instantaneously.
- Safety controls are not considered.
- Butane completely vaporizes and explodes.

**DISTANCE OF POTENTIAL IMPACT:**  
**2.3 MILES**



## PUTTING IT INTO PERSPECTIVE

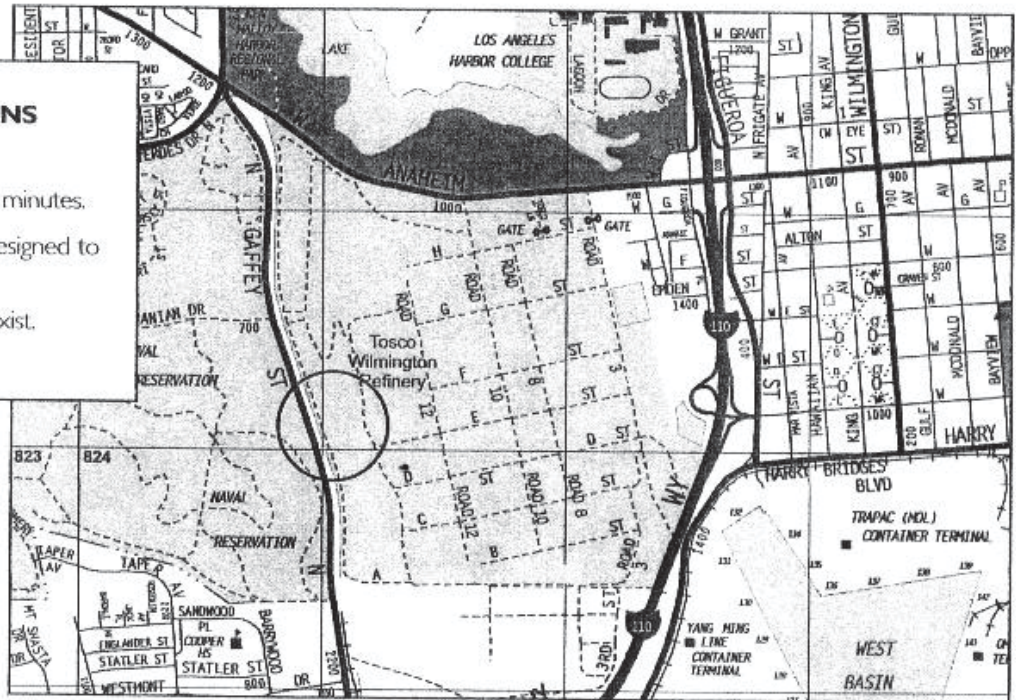
Worst Case Scenario Amount Released .....	5,092,000 Gallons
Alternate Release Scenario Amount Released .....	6,160 Gallons

# ALTERNATE RELEASE SCENARIO

## ALTERNATE RELEASE SCENARIO ASSUMPTIONS FOR BUTANE:

- Release of 30,000 lbs. in 15 minutes.
- Safety controls operate as designed to minimize release.
- Typical weather conditions exist.

**DISTANCE OF POTENTIAL IMPACT:**  
**0.11 MILES**



# ATTACHMENT B





**SAFETY ELEMENT EXHIBIT H**  
**Critical Facilities & Lifeline Systems**  
**In the City of Los Angeles**

**Selected Transportation Routes**

- Selected Disaster Route
- State Highway
- Interstate Highway
- Federal Highway
- Caltrans Freeway Interchange  
High priority for Caltrans retrofit program  
(May include railroad crossing)
- Caltrans Pedestrian Crossing

**Selected Emergency Facilities**

- Major Communication Center
- LA County Maintenance Warehouse
- LA City Maintenance Warehouse

**Selected Dependent Care Facilities**

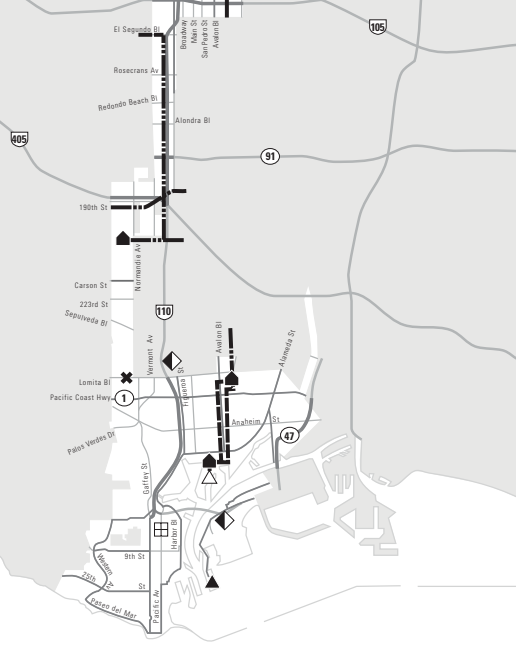
- Major Acute Care Hospital (Capacity greater than 500)
- Other Major Hospital
- LA County Community Care Facility (Capacity greater than 200)
- Major Jail Facility

**Selected Lifeline Facilities**

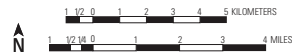
- Gas Compressor Station
- Electrical Power Plant
- Water Treatment Plant
- Waste Water Treatment Plant
- Major Transmission Substation
- High Voltage Transmission Line (Aerial Power Line)
- Underground Electrical Transmission Line
- Major Aqueduct

**NOTES**

1. This map is intended to present the general distribution of community elements vulnerable to damages from a variety of hazards. In order to preserve map clarity, all important critical facilities and lifelines are not shown.
  2. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes.
  3. The selected disaster routes also provide a plan for interjurisdictional road reconstruction and rebuilding following a major disaster.
  4. The compilation of selected lifeline facilities relied heavily upon California Division of Mines and Geology, Earthquake Scenario Reports, Special Publications 60 and 90.
  5. This map is intended for general land use and disaster planning purposes only.
- Source: LA County Safety Element Technical Appendix, Plate 8, December 1990 & General Plan Framework EIR.



SAFETY ELEMENT EXHIBIT H  
 Critical Facilities and Lifeline Systems



# ATTACHMENT C



52  
6 unit Rowhouse next to SFR.jpg



53  
Quad 2.jpg



54  
Quad.jpg



55  
Triplex next to SFR.jpg

# ATTACHMENT D

**SINGLE-FAMILY RESIDENTIAL  
BUILDING SPECIFICATIONS  
"D" CONSTRUCTION**

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



**SINGLE-FAMILY RESIDENTIAL  
BUILDING SPECIFICATIONS  
"D" CONSTRUCTION**

<b>POST 1990</b>	<b>D-8 QUALITY</b>	<b>MODERN</b>
<b>Foundation</b> Reinforced concrete		
<b>Floor Structure</b> Standard wood frame or slab on grade reinforced concrete, vapor barrier, base 4" thick		
<b>Walls and Exterior</b> Framing: Standard wood or steel frame Sheathing: Line wire and paper, plywood, or particle board Cover: Good wood siding, masonry, or stucco Windows: Vinyl framed wood or aluminum; divided light; slide or double hung, double glaze Front Doors: Single or double, good quality decorative wood or metal; glass trim; side glass panels		
<b>Roof</b> Framing: Standard wood or steel frame Cover: Heavy wood shake, concrete shake, tile, or high definition composition roof Overhang: 0" to 24", ceiled or unceiled Gutters: Good quality at all eaves		
<b>Floor Finishes</b> Terrazzo, mission, or quarry tile in entry; good hardwood, carpet, vinyl, slate, or quarry tile throughout		
<b>Interior Finish</b> Drywall with good texture and paint; custom decorative woodwork and molding; rounded corners; some good wallpaper, vinyl wall cover, or veneer paneling Ceilings: Standard 9' to 11', vaulted, crown molding, coffered, or arched; good quality fans		
<b>Interior Detail</b> Interior Doors: Good quality wood Trim: Good quality wood Decorative plant shelves and art niches Closets: Good wood and mirrored doors; some walk-ins		
<b>Bath Detail</b> Number: 2 1/2 to 3 Floors: Good quality ceramic tile or vinyl tile Walls: Drywall and enamel; good wallpaper and ceramic tile Shower & Tub: Good acrylic or porcelain; good ceramic tile trim, with glass doors; glass block Twin basin vanities and compartmentalized bath		
<b>Kitchen</b> Base Cabinet: Good hardwood veneer Wall Cases: Good hardwood veneer; under cabinet lighting Drain Board: Good ceramic tile, cultured marble, granite, or Corian Island cabinets with fixtures		
<b>Plumbing</b> Galvanized, plastic, or copper pipe; 10 good fixtures; washer outlet; two water heaters		
<b>Special Features</b> Multiple sliding glass or French doors; good quality built-in double oven, range, dishwasher, garbage disposer, range hood and fan, microwave, compactor, and wet bar; utility room with laundry sink; pre-wired for security; walk-in pantry; hot water recirculator; fireplace		
<b>Electrical</b> Cable wiring; good quality fixtures; bedroom ceiling fixtures; recessed lighting		

**SINGLE-FAMILY RESIDENTIAL  
MODERN TYPE  
SQUARE FOOT AREA COST TABLES**

**"D" CONSTRUCTION - SHAPE B**

<b>Class</b>	<b>700</b>	<b>800</b>	<b>900</b>	<b>1000</b>	<b>1100</b>	<b>1200</b>	<b>1300</b>	<b>1400</b>	<b>1500</b>	<b>1600</b>	<b>1700</b>
D-5	77.49	74.26	71.47	69.30	67.41	65.83	64.54	63.30	62.24	61.32	60.51
D-5.5	85.22	81.62	78.64	76.27	74.12	72.35	71.01	69.62	68.51	67.50	66.60
D-6	98.18	94.12	90.55	87.86	85.45	83.39	81.84	80.29	79.02	77.80	76.73
D-6.5	109.07	104.50	100.51	97.53	94.86	92.61	90.83	89.04	87.70	86.34	85.23
D-7	121.05	115.97	111.65	108.27	105.34	102.86	100.91	98.89	97.26	95.88	94.65
D-7.5	140.45	134.63	129.57	125.70	122.31	119.35	117.13	114.77	113.02	111.24	109.80
D-8	164.28	157.41	151.61	147.00	142.99	139.64	136.94	134.26	132.13	130.15	128.39
D-8.5	188.26	180.41	173.73	168.49	163.82	160.01	156.94	153.84	151.36	149.15	147.15
D-9	256.51	245.78	236.67	229.55	223.21	218.03	213.80	209.57	206.22	203.18	200.47
D-9.5	367.08	351.62	338.72	328.40	319.39	311.94	305.85	299.88	295.11	290.75	286.84
D-10	422.12	404.37	389.50	377.68	367.31	358.80	351.77	344.84	339.37	334.37	329.81

**"D" CONSTRUCTION - SHAPE B**

<b>Class</b>	<b>1800</b>	<b>2000</b>	<b>2200</b>	<b>2400</b>	<b>2600</b>	<b>2800</b>	<b>3000</b>	<b>3200</b>	<b>3400</b>	<b>3600</b>	<b>4000</b>
D-5	59.74	58.48	57.53	56.66	55.88	55.21	54.68	54.14	53.70	53.32	52.73
D-5.5	65.70	64.36	63.30	62.24	61.42	60.77	60.12	59.59	59.09	58.67	57.99
D-6	75.78	74.12	72.93	71.81	70.88	70.02	69.27	68.63	68.07	67.56	66.85
D-6.5	84.12	82.37	81.01	79.71	78.64	77.76	76.91	76.21	75.59	74.99	74.23
D-7	93.40	91.36	89.94	88.50	87.28	86.27	85.43	84.56	83.95	83.33	82.43
D-7.5	108.38	106.06	104.37	102.78	101.32	100.16	99.15	98.16	97.37	96.67	95.61
D-8	126.83	124.11	122.09	120.21	118.51	117.12	116.02	114.87	113.92	113.08	111.87
D-8.5	145.25	142.22	139.92	137.76	135.86	134.26	132.92	131.62	130.55	129.55	128.20
D-9	197.92	193.77	190.69	187.66	185.06	182.88	181.06	179.32	177.86	176.48	174.66
D-9.5	283.25	277.19	272.71	268.59	264.86	261.66	259.14	256.56	254.51	252.55	249.97
D-10	325.72	318.78	313.65	308.84	304.52	300.91	297.96	295.09	292.67	290.45	287.41

**"D" CONSTRUCTION - SHAPE B**

<b>Class</b>	<b>4200</b>	<b>4400</b>	<b>4600</b>	<b>5000</b>
D-6	66.26	65.72	65.27	64.61
D-6.5	73.57	72.97	72.47	71.74
D-7	81.69	81.05	80.48	79.67
D-7.5	94.74	93.99	93.32	92.40
D-8	110.88	109.99	109.22	108.13
D-8.5	127.23	125.65	124.69	123.82
D-9	173.10	171.71	170.51	168.80
D-9.5	247.70	246.84	245.12	242.66
D-10	284.83	282.54	281.66	278.85

**SINGLE-FAMILY RESIDENTIAL  
MODERN - POST 1990  
D-6 QUALITY**



**SINGLE-FAMILY RESIDENTIAL  
MODERN - POST 1990  
D-8 QUALITY**



# ATTACHMENT E

## School Profile

### TAPER EL

1824 Taper Ave  
San Pedro, Ca 90731

Office : 310-832-3056  
Fax : 310-548-4485

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

GENERAL INFORMATION			
Principal : Steinbach, Doreen	Location Code : 7035	Educational Service Center : S	Configuration : K- 5
Calendar : 1 TRK	Number of Tracks : 1	Year Opened :	Title 1 : No
Cost Center Code : 1703501	Charter : No	Learn : Yes	SBM : No
Assembly : 70	Senate : 35	Congress : 33 Karen Bass	Council : 15 Janice Hahn
Supervisor : 4 Don Knabe	Board of Education : 7 Richard Vladovic	Web Site : <a href="http://www.lausd.k12.ca.us/Taper_EL">www.lausd.k12.ca.us/Taper_EL</a>	

## Student Racial & Ethnic History

Year	AI/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2011-12	10	1.6	50	8.0	15	2.4	6	1.0	46	7.3	296	47.3	203	32.4	626
2010-11	10	1.4	43	6.2	19	2.7	7	1.0	51	7.4	337	48.7	225	32.5	692
2009-10	9	1.3	61	9.1	0	0.0	8	1.2	49	7.3	324	48.6	216	32.4	667
2008-09	6	0.9	29	4.3	19	2.8	6	0.9	52	7.8	333	49.9	223	33.4	668
2007-08	6	0.9	27	4.2	21	3.3	9	1.4	44	6.8	327	50.7	211	32.7	645

## School Profile

### DODSON MS

28014 Montereyna Dr  
Rancho Palos Verdes, Ca 90275

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

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

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

## Student Racial & Ethnic History

Year	AI/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2011-12	10	0.5	83	4.6	96	5.3	24	1.3	209	11.5	1105	60.7	292	16.1	1819
2010-11	2	0.1	79	4.5	108	6.1	22	1.2	215	12.2	1047	59.5	288	16.4	1761
2009-10	3	0.2	171	9.1	2	0.1	17	0.9	215	11.4	1154	61.4	317	16.9	1879
2008-09	5	0.3	84	4.4	85	4.5	9	0.5	213	11.2	1180	61.8	334	17.5	1910
2007-08	5	0.3	77	3.9	76	3.9	10	0.5	221	11.2	1225	62.3	351	17.9	1965

## School Profile

**NARBONNE SH**

**24300 S Western Ave**  
**Harbor City, Ca 90710**

**Office : 310-257-7100**  
**Fax : 310-326-1805**

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

GENERAL INFORMATION			
Principal : Kobata, Gerald	Location Code : 8779	Educational Service Center : S	Configuration : 9-12
Calendar : 1 TRK	Number of Tracks : 1	Year Opened :	Title 1 : Yes
Cost Center Code : 1877901	Charter : No	Learn : Yes	SBM : No
Assembly : 66	Senate : 35	Congress : 43	Council : 15 Janice Hahn
Supervisor : 4 Don Knabe	Board of Education : 7 Richard Vladovic	Web Site : <a href="http://www.narbonnehsqauchos.com">www.narbonnehsqauchos.com</a>	

## Student Racial & Ethnic History

Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2011-12	24	0.7	103	3.1	226	6.8	66	2.0	580	17.4	2062	61.8	274	8.2	3335
2010-11	19	0.5	116	3.3	209	6.0	71	2.0	617	17.7	2214	63.5	240	6.9	3486
2009-10	14	0.4	310	9.0	10	0.3	74	2.2	582	16.9	2197	63.8	254	7.4	3441
2008-09	11	0.3	147	4.4	192	5.7	61	1.8	568	16.9	2110	62.8	271	8.1	3360
2007-08	10	0.3	160	4.7	208	6.1	58	1.7	640	18.6	2028	59.0	331	9.6	3435



FRANK V. ZERUNYAN  
*Mayor*

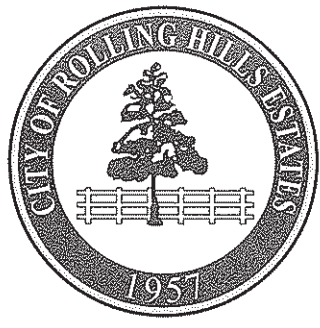
JUDY MITCHELL  
*Mayor Pro Tem*

JOHN C. ADDLEMAN  
*Council Member*

SUSAN SEAMANS  
*Council Member*

STEVEN ZUCKERMAN  
*Council Member*

DOUGLAS R. PRICHARD  
*City Manager*



CITY OF  
**ROLLING HILLS ESTATES**

4045 PALOS VERDES DRIVE NORTH • ROLLING HILLS ESTATES, CA 90274  
TELEPHONE 310.377.1577 FAX 310.377.4468  
www.ci.Rolling-Hills-Estates.ca.us

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CITY OF LOS ANGELES

JAN 23 2013

ENVIRONMENTAL  
UNIT

January 3, 2013

Ms. Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

**Subject:** Ponte Vista DEIR – Case No. ENV-2005-4516-EIR (26900 South Western Avenue)

Dear Ms. Strelch:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the project as referenced above.

The following comments have been prepared in response to the DEIR dated November 2012 for a planned 1,135 unit medium density housing project to be located at 26900 South Western Avenue in the City of Los Angeles. The DEIR concludes that there will be significant traffic related impacts at the intersection of Crenshaw Boulevard and Palos Verdes Drive North as the result of this project. After a review of the DEIR and Traffic Impact Analysis (TIA), the following comments should be addressed:

1. The TIA fails to evaluate the intersection at Palos Verdes Drive North and Rolling Hills Road. The intersection operates at an LOS=E in the PM peak hour and would be expected to handle up to 8% inbound and 8% outbound project traffic. The project distribution would likely include Rolling Hills Road as a north-south access to Crenshaw Boulevard and Pacific Coast Highway. Therefore, this intersection must be analyzed using City of LA and Rolling Hills Estates impact criteria for all scenarios. This intersection should be added to all tables and figures in the TIA and DEIR.
2. Palos Verdes Drive North typically operates at or over capacity in the AM and PM peaks between Palos Verdes Drive North and Hawthorne Boulevard. Therefore, a street segment analysis is needed on this roadway pursuant to other segments conducted in the TIA.

A16-1

A16-2

3. The City of Rolling Hills Estates strongly objects to the proposed TRANS-2 mitigation measure at Crenshaw Boulevard and Palos Verdes Drive North (PVDN). A northbound right turn overlap phase would adversely impact local neighborhood access east of the intersection due to the very limited gaps available on Palos Verdes Drive North. The existing "No Right Turn on Red" restriction for northbound right turn movements has been in place for over 10 years as a means to provide sufficient gaps for motorists on side streets to enter/exit PVDN. Removal of this restriction would severely congest the single east bound lane. The City recommends that the Response to DEIR Comments provide an alternate mitigation measure, such as a third southbound lane on Crenshaw Boulevard. Table I-1 and all related figures in the TIA and DEIR should be revised accordingly.
4. Figure IV. N-3 of the DEIR is incorrectly shows the lane configuration for the intersections instead of the AM Existing Traffic Volumes.
5. The increase in traffic on roadways within Rolling Hills Estates due to the project would result in an incremental increase in the demand for public safety resources such as Fire and Police services.

A16-3

A16-4

A16-5

The City supports the findings and recommendations made by the City of Lomita in their response to comments letter dated December 19, 2012 for this project. In particular, the recommended mitigation measures need to be acceptable by the jurisdiction in which they are proposed, and all costs associated with the measures must be paid by the applicant, including all design review, local and regional permits and fees, staff and/or professional consultant time, and construction inspection. In addition, the City of Los Angeles must take the lead in informing the adjacent cities of the pending project activities and related mitigations as well as soliciting their comments prior to public noticing.

A16-6

The City of Rolling Hills Estates would much appreciate if your traffic studies are revised to address the above-mentioned issues. Should you have any questions or need additional information, please do not hesitate to contact me at City Hall at (310) 377-1577, extension 103, or by email at [davidw@ci.rolling-hills-estates.ca.us](mailto:davidw@ci.rolling-hills-estates.ca.us).

Sincerely,



David Wahba  
Planning Director

- CC: 1. RHE City Council  
2. City of RPV, RH and Lomita City Manager/City Council



THE CITY OF  
ROLLING HILLS ESTATES  
4045 PALOS VERDES DRIVE NORTH  
ROLLING HILLS ESTATES, CALIFORNIA 90274

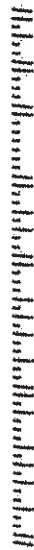
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JAN 23 2013

ENVIRONMENTAL  
UNIT

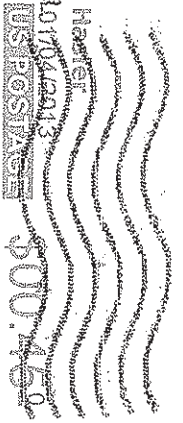
Ms. Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

90012324375



LOS ANGELES CA 900

04 JAN 2013 PM 13



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December 4, 2012

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DEC 10 2012

ENVIRONMENTAL  
UNIT

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strelch:

Re: I-Star Financial Ponte Vista Project

This letter is in opposition to the new plan proposed by I-Star for the Ponte Vista tract of vacant housing on Western Avenue in San Pedro across from Green Hills Cemetery, which is in Rancho Palos Verdes. Their plans for 143 single family homes, 140 townhomes, 634 condominiums, and 281 apartment homes would require a City of Los Angeles General Plan Amendment and zoning change which would be inappropriate, as this tract should be kept R1.

I-Star Financial is a Manhattan-based commercial property lender who has been trying to avoid bankruptcy. Their plan states that the development would not be complete until 2027. Is that a typographical error? If not, this is outrageous. Are they just trying to flip the property? Who is the actual builder involved? Are they simply trying to modify the Bisno plan and expecting to get away with it, or do they not know that there was a successful R1 campaign against the previous project?

This use of the property makes no sense. We know what a nice tract it once was when it was Navy property, and that it could be and should continue to be a beautiful R1 development.

Sincerely,



Elizabeth Yeager  
27803 S. Montereina Dr.  
Rancho Palos Verdes, CA 90275-1230  
[EPYeager@aol.com](mailto:EPYeager@aol.com)

B1-1

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DEC 10 2012

ENVIRONMENTAL  
UNIT

December 4, 2012

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strellich:

Re: I-Star Financial Ponte Vista Project

This letter is in opposition to the new plan proposed by I-Star for the Ponte Vista tract of vacant housing on Western Avenue in San Pedro across from Green Hills Cemetery, which is in Rancho Palos Verdes. Their plans for 143 single family homes, 140 townhomes, 634 condominiums, and 281 apartment homes would require a City of Los Angeles General Plan Amendment and zoning change.

Although this features a lower number of units, the proposal does not differ in substance from the previous plan for the property proposed by Bob Bisno for 2300 units on the 61.5 acre property. Because of limited access and only 2 entrance/outlet streets both onto Western Avenue, this property is not suited for anything but the existing R1 zoning.

I-Star is either not aware of the history of the Ponte Vista property development or chooses to ignore it. As a resident of the Rolling Hills Riviera tract which is directly across Western from the Ponte Vista tract, we are opposed to anything for that location that is not R1. The new I-Star proposal is just a scaled down version of a the Bisno plan and is another poorly conceived jumble of various types of property which are inappropriate to that location.

Sincerely,



Walter C. Yeager  
27803 S. Montereina Dr.  
Rancho Palos Verdes, CA 90275-1230  
[yeager@cox.net](mailto:yeager@cox.net)

B2-1

December 4, 2012

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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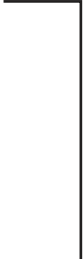
DEC 12 2012

ENVIRONMENTAL  
UNIT

RE: Ponte Vista, San Pedro, CA, Keep it R-1

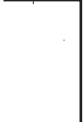
Dear Erin,

We are writing to urge you to keep the zoning R-1 for the Ponte Vista project along Western Avenue in San Pedro, CA. We live in the tract across the street on Avenida Aprenda. We expect development there but are worried about traffic, utilities, emergency services, policing etc. After looking at the proposal from iStar, it is apparent they are being evasive, using terms such as approximately, and occasionally untruthful about the project, specifically regarding the percentage of rentals. We also do not agree with the mixed styles of architecture. The effects of construction, noise, air quality and vibrations, to the surrounding community will be unfair and an exceedingly long period of time.



B3-1

With the condominiums mostly empty next door to this project, it is apparent that we do not need more apartments, flats and condominiums in this area. PLEASE keep the zoning R-1 for this project. It will fit in with the surrounding community and will be less of a strain on everything.



B3-2

Sincerely,

A handwritten signature in black ink that reads "mike and lisa frka".

Mike and Lisa Frka

**William D. Marks  
2035 Avenida Feliciano  
Rancho Palos Verdes, CA 90275  
(310) 547-9659**

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DEC 07 2012

**December 4, 2012**

ENVIRONMENTAL  
UNIT

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strelch:

**Re: I-Star Financial's Ponte Vista Project**

My family and I have lived in the area near the proposed Ponte Vista project for almost 40 years and have seen the traffic along Western Avenue increase steadily till it is nearing gridlock status (even now it is in gridlock on occasion). Western Avenue simply cannot continue to absorb large numbers of additional vehicles.

The property was purchased, originally by Bob Bisno and now by I-Star Financial, with the full knowledge that the property is zoned R1. I have no complaint about the property being developed with R1 zoning, although even that will add to the congestion on Western Avenue. Neither should I-Star Financial have any complaint about developing the property as R1.

Please do not change the zoning to allow I-Star Financial to increase the density of the housing on the Ponte Vista property. They have no right to expect it, and Western Avenue cannot tolerate it.

Yours truly,



William D. Marks

B4-1

*[Faint, illegible text at the bottom of the page, possibly bleed-through from the reverse side.]*

11/12/12

To

Erin Strelch, Planning Assistant  
Los Angeles Dept. of City Planning  
200 N. Spring St. Room 750  
Los Angeles Ca. 90012

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NOV 20 2012

ENVIRONMENTAL  
UNIT

Dear Mz Strelch,

This letter is a response to your notice on the Ponte Vista Project  
DEIR No. ENV-2005-4516-EIR, State Clearinghouse No. 2010101082.  
I am vehemently opposed to a zoning change for this project. This will result in  
an increase in population density that in turn will result in permanent  
damage to air quality and marked worsening of traffic on Western Ave. which  
is already o.ver.burdened.



B5-1

Respectfully,

Harold G. Lund M.D.  
St. Anton LLC P.O.Box 459 Lomita Ca. 90717



From: **Jim Urwin** <[Jim.Urwin@freshandeasy.com](mailto:Jim.Urwin@freshandeasy.com)>  
Date: Wed, Nov 14, 2012 at 9:04 AM  
Subject: Impact Report 2005-4516-EIR/State Clearinghouse #2010101082  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Erin,

I am writing concerning the planned Ponte Vista Project located at 26900 S Western Ave, San Pedro, CA. 90732. I am a current resident (owner) of a condo in the Tennis Club Complex located at 27980 S Western Ave, San Pedro and want to voice my concerns of the planned development. Western Ave is not designed to handle the increased volume this development would create. Traffic congestion starts approx 5am every morning with the evening commute (4pm-7pm) being much worse. I experience this issue every day as I try to return home from work. It has taken me 30 min to go 200 yards on Western Ave. sometimes. With Gaffey being a good route to get into San Pedro, Western is really the only good route to access RPV, PV, San Pedro, the coast going west and Lomita, Torrance, etc going south. PCH & PV Drive North are already heavily congested and increased volume will only add to the problem. Because of the planned location of this project, additional access other than Western Ave. are very limited if at all. Businesses, schools, baseball fields and oil refineries border this development. Please include my comments in the meeting/discussions regarding this project as I have submitted them during the 45-day comment period. Thank you for your time.

B6-1

Happy Thanksgiving

Jim Urwin

Logistics Manager

Fresh & Easy Neighborhood Market

----- Disclaimer -----

This is a confidential email.

Fresh and Easy may monitor and record all emails. The views expressed in

this email are those of the sender and not Fresh and Easy. Fresh & Easy  
Neighborhood Market, Inc. 2120 Park Place, El Segundo, CA 90245

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

From: **pat nave** <[overbid2002@yahoo.com](mailto:overbid2002@yahoo.com)>

Date: Mon, Jan 7, 2013 at 11:04 AM

Subject: comments on Ponte Vista

To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>, "[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)" <[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)>

I hereby submit as my comments, and adopt as my own, the comments submitted by  
NWSPNC, R Neighborhoods R1, SPHU, and Rancho Palos Verdes.

I do this in order to preserve my right to raise the issues in those comments in all further  
future proceedings.

B7-1

From: **mike deluca** <[maddeluca@yahoo.com](mailto:maddeluca@yahoo.com)>

Date: Mon, Dec 17, 2012 at 3:29 PM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

I live on Caddington and Western, all anyone has to do is drive down Western between the hours of 2pm and 6pm to figure out there is a traffic density problem. I understand the desires of the developer to make money from their investment and their need move forward but the available infrastructure in this area will not and can not support this project.

B8-1

Thanks for your time,  
Mike De Luca  
1831 Caddington Dr. #57  
RPV, Ca, 90275

From: **April Sandell** <[hvybags@cox.net](mailto:hvybags@cox.net)>

Date: Wed, Dec 19, 2012 at 7:00 PM

Subject: Comments re: Ponte Vista ENV-2005- 4516 - EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I have resided near the site project for over 32 years. • Absent alternate routes, Western Avenue is our only access to the rest of the world. • Western Avenue cannot possibly handle additional traffic impact the site plan proposes. • I cannot support the current plan short of providing Ponte Vista access to Gaffey, which isn't likely to happen. • As it stands, the left hand turn lane on Western into Rolling Hills Riveria is ridiculously short. • No one can get into the left hand turn lane due to a mere 4-5 cars intended to head north. • I could knit a sweater waiting to turn left .

I don't like your plan. • Rental housing is not appropriate for the area. • The down-sized project appears to be just that ; • A housing project that is a poor land use.

There are a number of other issues of concern too long to go into at this holiday time. • Nonetheless, it was important to submit a comment before the deadline.

To reiterate , • I cannot embrace the plan.

Thank you for your time and consideration.

April Sandell  
RPV

B9-1

From: **Rob Thorsen** <[thorsen.rob933@gmail.com](mailto:thorsen.rob933@gmail.com)>  
Date: Thu, Dec 20, 2012 at 7:13 AM  
Subject: ponte vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

r-1 only=quality of life, traffic



B10-1

December 18, 2012

Dear Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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ENVIRONMENTAL  
UNIT

Subject: ENV-2005-4516-EIR

Ponte Vista has, in the past, been a community of around 500 single-family homes. With the growth we have seen in San Pedro, Lomita, Harbor City, and Rancho Palos Verdes, I don't see why it should be any more than that. I support the developer making money with that number of units.

It's the holiday season, which constrains the amount of time I am devoting to this commentary. I don't see, again, why after years of no use of this land it is now a rush to get this done, when doing it later on in January or February would have been fairer to those wishing to review the DEIR.

Please be fair to both sides, residents and developers, keeping in mind that when the development is done, the developers leave and the residents live with what has been done.

Yours truly,



James M. Smith  
San Pedro

B11-1

From: irene <[i\\_kurata@yahoo.com](mailto:i_kurata@yahoo.com)>  
Date: Sat, Dec 29, 2012 at 3:01 PM  
Subject: DEIR – Ponte Vista Project  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Dear Ms. Strelich,

I am a resident in the area known as the Lomita Pines and I oppose the staff recommendation detailed in the DEIR.  With the exception of Alternative A, all DEIR project options present a significant density increase over what the site had previously supported.  Over the last decades since the closure of the former Navy housing site, a great deal of development has occurred on the Palos Verdes Peninsula which has significantly degraded traffic on Western Ave, Palos Verdes Dr N and Crenshaw Blvd.  I do not feel the DEIR adequately examines the impacts of the proposed project.

B12-1

If development is to occur on this site, I urge the city to consider the following:

- Traffic impacts to 263rd and 262nd Streets.  Cut through traffic (between Western Ave and PCH) will increase along these residential streets.

- Dodson Middle School traffic spills over to Delasonde Dr.  This eastbound traffic frequently blocks the Pontevedra and Galerita Dr intersections as cars wait for the light to change at Western Ave.  I suspect the left turn lane alone on Delasonde Dr (at Western Ave) will do little to alleviate this situation.

B12-2

- Why is a Gaffey St exit from the project site not an option?

B12-3

- Alternative B (the 100% single family home option):

o This option should not be allowed without the park.  A park has many health and aesthetic values - the park would undoubtedly help new homes sell and enhance the desirability of the new neighborhood.

B12-4

o  I only found the home design for this option that resembles townhomes and precludes disabled person access.  A bedroom on the main floor would attract multi-generation families and better accommodate our aging demography.

B12-5



- It doesn't appear the project intends to utilize 'laundry-to-landscape' graywater plumbing.  It seems new development projects provide an ideal opportunity to incorporate features that pushes the envelope a little further to encourage water saving.

B12-6

Overall, if development is to occur, the project design includes many attractive features such as drought tolerant landscaping, bike paths and public transit access.  But, I feel the project misses some key opportunities and I am very concerned about the traffic impacts.  I hope the City will take my concerns listed above into consideration.

B12-7

Sincerely,

Irene Kurata

Lomita, CA homeowner

From: **LINDA GOSSETT** <[redbkkr@sbcglobal.net](mailto:redbkkr@sbcglobal.net)>  
Date: Tue, Jan 1, 2013 at 1:47 AM  
Subject: Project - San Pedro - Pointe Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

In regards to the project located in San Pedro on Western Avenue (Pointe Vista).

The following issues need to be urgently addressed before this project moves forward.

- ☒ A NEW SIGNAL NEEDS TO BE INSTALLED AT AVENIDA APRENDA & WESTERN AVENUE TO ALLOW "U TURNS" TO PROCEED SOUTH ON WESTERN AVE. OUR PROPERTY LOCATED AT 27980 S. WESTERN AVE, SAN PEDRO WILL BE GREATLY IMPACTED BY THE INCREASE IN TRAFFIC FROM THE CONSTRUCTION AT POINTE VISTA. THERE HAVE ALREADY BEEN NUMEROUS CAR ACCIDENTS AT FITNESS DRIVE AND WESTERN, BECAUSE OF THE LEFT TURN TRAFFIC THAT CAN PROCEED SOUTH ON WESTERN AVE.
- ☒ WE ALSO NEED TO HAVE THE STREET MARKED "DO NOT BLOCK" AT FITNESS DRIVE (27980 & 28002, 28004 WESTERN AVE.). IT HAS BECOME ALMOST IMPOSSIBLE TO MAKE TURNS, EITHER RIGHT OR LEFT ON TO WESTERN AVE.
- ☒ MY UNDERSTANDING IS THAT THERE IS A PROPOSAL FOR A "GREEN" SPACE OR PARK TO LOCATED AT THE VERY SOUTH END OF THE POINTE VISTA PROJECT NEXT TO OUR PROPERTY LOCATED AT 27980 S. WESTERN AVE. WE WOULD LIKE TO REQUEST THAT HOURS BE SET FOR USE OF THE PARK INCLUDING HOW LATE ANY "LIGHTS" WOULD REMAIN IN USE. OUR BUILDING IS VERY CLOSE TO THAT AREA AND ANY USE OF THE SPACE EITHER VERY EARLY OR LATE WOULD DISTURB THE RESIDENTS.

B13-1

B13-2

B13-3

WE RESPECTFULLY REQUEST THAT OUR NEEDS BE RESPONDED TO IN THIS MATTER.

THANK YOU FOR YOUR ASSISTANCE.



From: erin vaughn <[evaughny@hotmail.com](mailto:evaughny@hotmail.com)>  
Date: Wed, Jan 2, 2013 at 2:38 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>  
Cc: "[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)" <[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)>

**I completely support the comments below. I'm not against building on the old navy housing property but please give serious and thoughtful concern to the quality of life in San Pedro before any plans are approved.**

Sincerely,

**Erin Carter, 5th generation San Pedro resident**

B15-1

### Summary of Principal Comments

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.

B15-2

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.

B15-3

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.

B15-4

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.

B15-5

7. The DEIR should analyze at least one additional alternative that better addresses the

B15-6



environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B15-6  
(Cont)

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B15-7

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can't get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

B15-8

10. The fact that noxious fumes are emitted occasionally from the Defense Fuel Supply Point located next to the property is of particular concern as there is no plan to curtail them. That fact was made clear by the federal government when the property was originally sold.

B15-9

11. The community is now planned to be gated which was an option that was rejected by the Ponte Vista committee set up by former Councilwoman Janice Hahn to review the first plan of 2300 units. Gated communities are exclusionary not inclusionary and despite there being a few built in San Pedro quite a few years ago, they are not in keeping with the nature of most of San Pedro. Who are they trying to keep out anyway?.....

B15-10

Sent from my iPhone

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

From: **Bryan Bero** <[bryanbero@aol.com](mailto:bryanbero@aol.com)>

Date: Wed, Jan 2, 2013 at 4:41 PM

Subject: Ponte Vista

To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please use alternative A! Keep the zoning R1! Thank you



B16-1

Sent from my iPhone

From: <[Penicks@aol.com](mailto:Penicks@aol.com)>

Date: Wed, Jan 2, 2013 at 4:51 PM

Subject: keep the development R1

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)



B17-1

From: **Jan Franklin** <[JFRANKLIN@logixbanking.com](mailto:JFRANKLIN@logixbanking.com)>  
Date: Wed, Jan 2, 2013 at 4:54 PM  
Subject: Ponte Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep the project at Single Family Homes (Alternate A) to eliminate problems for existing residents.

B18-1

Thank you,

LaRene A Edgar Rolling Hills Rivera Homeowner

-----  
Jan Franklin • Senior Vice President

P.O. Box 6759 • Burbank, CA 91510

[\(818\) 565-2127](tel:(818)565-2127) • [\(208\) 247-7397](tel:(208)247-7397) Fax

[jfranklin@logixbanking.com](mailto:jfranklin@logixbanking.com) • [www.logixbanking.com](http://www.logixbanking.com)



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From: <[SherryHuber@aol.com](mailto:SherryHuber@aol.com)>  
Date: Wed, Jan 2, 2013 at 4:55 PM  
Subject: Recommend Alternate A  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please keep the development R1 as it is currently zoned.

Thanks you,  
Sharon Huber, current homeowner in the Palo De Encino tract.



B19-1

From: [gjkmckim@juno.com](mailto:gjkmckim@juno.com) <[gjkmckim@juno.com](mailto:gjkmckim@juno.com)>

Date: Wed, Jan 2, 2013 at 4:53 PM

Subject: Ponte Vista Development

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hello! It is our understanding that the Ponte Vista Development is again being decided. My wife and I live on the west side of Western Ave. and will be directly effected by your decision. We bought our home 28 years ago and appreciate where we live and the current quality of life. We support Alsternate A - "No project alternative/single family home" and limit Ponte Vista to 385 units. Please keep the development area R1, just as it always has been and always should be. Thank you for your listening to us.

gale & Judy McKim

B20-1

From: **Dean Nelson** <[rhehdn@cox.net](mailto:rhehdn@cox.net)>

Date: Wed, Jan 2, 2013 at 5:23 PM

Subject: Ponte Vista

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Regarding the Ponte Vista Development project, I would like to sincerely ask that it be kept R-1 only. □



B21-1

□  
Johnnie M. Nelson  
27909 Alaflora Dr.  
R.P.V.

From: **Njvanlue** <[jannick@cox.net](mailto:jannick@cox.net)>  
Date: Wed, Jan 2, 2013 at 5:38 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please keep the development R1 as it is currently zoned. Western Ave. is already extremely busy. Thank you.  
Nick & Jan Van Lue

B22-1

From: **rbm** <[rayebethm@ca.rr.com](mailto:rayebethm@ca.rr.com)>  
Date: Wed, Jan 2, 2013 at 5:45 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

**Dear Ms. Strelich,**

**I am a homeowner living south of the proposed Ponte Vista project. Although it would be wonderful to improve the land as it currently stands, I have great reservations about the size of the proposed development. Western Ave. is gridlocked much of the time. I can't imagine adding 800+ units to that mix of traffic. I urge that serious consideration be given to this issue. I'm sure more savvy individuals have raised other issues as well but for me the traffic impact is my primary concern.**

B23-1

**Thank you.**

**Raye Murphy**

From: **Michael Mattingly** <[mattingl.m@sbcglobal.net](mailto:mattingl.m@sbcglobal.net)>

Date: Wed, Jan 2, 2013 at 5:48 PM

Subject:

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I live their , I vote no project the traffic is horendus now.



B24-1

From: **Lucy Howard** <[mshoward515@sbcglobal.net](mailto:mshoward515@sbcglobal.net)>  
Date: Wed, Jan 2, 2013 at 5:59 PM  
Subject: Point Vista Project  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Dear Erin Strellich:

This correspondence comes as an opposition to the Ponte Vista Project. The current R-1 zoning needs to remain intact. Considering the proposed size of the project, rezoning would have to occur and is not advantageous.

Congestion, noise, and increased traffic for Western/Pacific Coast and Western/Palos Verdes Drive North would drastically increase with the number of homes proposed for the area. LAFD's response to provide adequate protection in emergencies would be minimized by roadway congestion due to the increase in traffic. Traffic congestion due to schools in the area already exist and would be worsened. Crime rate will increase as the level of activity increases. Opportunities for crime will intensify and is directly proportional to land use activity. Even if private security is included or provided for the new area, it does not directly impact the potential crime increase for those in our area.

This project presents too many complications for the existing adjacent communities in Rancho Palos Verdes, CA.

Sincerely,  
Ms. Lucy M. Howard  
Rancho Palos Verdes Resident

Sent from my iPad

B25-1

B25-2

From: <[MAC1989@aol.com](mailto:MAC1989@aol.com)>  
Date: Wed, Jan 2, 2013 at 6:18 PM  
Subject: deir ponte vista Env 2005-4516 eir  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmemberbuscaino@lacity.org](mailto:councilmemberbuscaino@lacity.org)

Please keep the development R1 as it is presently zoned.  
Thank you,  
Craig Macauley  
278185 Monterey dr.  
RPV, Ca 90275



B26-1



From: **Rose Muraro** <[rosemuraro@att.net](mailto:rosemuraro@att.net)>  
Date: Wed, Jan 2, 2013 at 6:26 PM  
Subject: Ponte Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep the development R1, at Ponte Vista.



B27-1

Thank you

**Rose Muraro**  
Real Estate consultant  
Broker-Associate  
License #00842117  
Keller Williams Realty  
28901 S. Western Ave. Suite 101  
Rancho Palos Verdes Ca. 90275  
Direct: [310-707-2153](tel:310-707-2153)  
Cell: [310-408-2910](tel:310-408-2910)  
Visit my web-site at [www.rosemuraro.com](http://www.rosemuraro.com)  
Serving the Entire South Bay since 1982

From: **FRANK DIVONA JR** <[fjr5757@sbcglobal.net](mailto:fjr5757@sbcglobal.net)>  
Date: Wed, Jan 2, 2013 at 6:55 PM  
Subject: Ponte Vista ENV 2005-4516-EIR Public Comments  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org), Donna  
<[divona@sbcglobal.net](mailto:divona@sbcglobal.net)>

Gentlemen:

My comments regarding the above sited report are as follows.

Section IV, Vol 1, D. Biological Resources

Many of the Reports in this section are a few years, for example, "The Reparian Bird Species Survey" was done in 2005. Shouldn't these older reports be updated to reflect todays findings?

B28-1

Shouldn't any report that is not relatively current be updated in an EIR?

Section IV, Vol 2, M. Public Service - Fire Protection

I am interested in how this development will impact emergency response times in our community since we seem to be always in need of more public safety personnel. I could not find any mention of the current response times for fire and police vrs how they would change after this development in built.

B28-2

Thank You  
Frank Divona  
Miraflores Park, San Pedro

From: **Joe Lanning** <[jplanning@yahoo.com](mailto:jplanning@yahoo.com)>

Date: Wed, Jan 2, 2013 at 7:13 PM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Erin,

The new Ponte Vista project, as envisioned by the developer, will create a permanent traffic NIGHTMARE on Western Ave. I urge that the project be kept as R1 zoning and the proposed mega-densing NOT be allowed.

B29-1

B29-1

Sincerely,

Joseph Lanning

From: **Ralph Dileva** <[rleva@sbcglobal.net](mailto:rleva@sbcglobal.net)>  
Date: Wed, Jan 2, 2013 at 7:30 PM  
Subject: Pontevista project  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep pontevista project R1-have you driven western avenue lately?



B30-1

From: **John Sover** <[jpsover@yahoo.com](mailto:jpsover@yahoo.com)>

Date: Wed, Jan 2, 2013 at 7:37 PM

Subject: Ponte Vista Development

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

As a homeowner that lives across the street from the Ponte Vista old Navy housing I would like to voice my concerns on the most recent proposal for the development of Ponte Vista. On behalf of my wife and family please keep the current zoning of R1 for the Ponte Vista development. The proposed Alternate A plan of 385 units would keep the R1 zone and definitely help the community in minimizing the huge congestion that is experienced on Western Ave each and every day.

B31-1

Respectfully,

John & Suzanne Sover  
1827 Avenida Estudiante  
RPV, CA 90275

From: <[marthamunoz@cox.net](mailto:marthamunoz@cox.net)>  
Date: Wed, Jan 2, 2013 at 7:39 PM  
Subject: Ponte Vista Development  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

As a resident of the neighborhood directly across from the proposed development area, I can tell you that traffic is already a challenge. Please keep the development R1.



B32-1

Martha Munoz

From: [mbhuskin@juno.com](mailto:mbhuskin@juno.com) <[mbhuskin@juno.com](mailto:mbhuskin@juno.com)>

Date: Wed, Jan 2, 2013 at 7:48 PM

Subject: Ponte Vista Development

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

We are definitely in favor of keeping the development as R-1 as it is currently zoned. Alternate "A" in the DEIR is best for the community!

Thanks,

Robert and Marjorie Huskins



B33-1

From: <[fuzdatwuz@cox.net](mailto:fuzdatwuz@cox.net)>  
Date: Wed, Jan 2, 2013 at 7:56 PM  
Subject: Re: Pointe Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please keep the R1 zone on this development. We are very congested as it is. Thx, Jay Nunez  B34-1



From: **Mike Frka** <[mafconstruction@aol.com](mailto:mafconstruction@aol.com)>  
Date: Wed, Jan 2, 2013 at 8:02 PM  
Subject: Ponte Vista, San Pedro, CA  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

PLEASE KEEP THE ZONING R-1 FOR THIS PROJECT.



B35-1

Thank you,

Mike and Lisa Frka

2029 Avenida Apenda, RPV, CA 90275

Sent from my iPad

From: <[Smarciacpa@aol.com](mailto:Smarciacpa@aol.com)>  
Date: Wed, Jan 2, 2013 at 8:31 PM  
Subject: Ponte Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

**We request that you please keep the development for Ponte Vista as R1, as it is currently zoned. There already is far too much traffic and congestion in the area. I don't care what the reports say, you need to live in the area to see the traffic and congestion. Thank you.**

B36-1

**Suzanne Marcia**

From: <[sumfhpoo@aol.com](mailto:sumfhpoo@aol.com)>  
Date: Wed, Jan 2, 2013 at 8:50 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin Strelich and the City of Los Angeles Planning Department:

Subject: Ponte Vista ENV-2005-4516-EIR

To all concerned:

I wish to first express my dismay regarding the short period of time we have been given to review the documents concerning the draft EIR on Ponte Vista. Because of the busy holiday period, for most people, myself included, this is not sufficient time to fully review and respond regarding this most important situation facing our quality of life in San Pedro. I request the deadline of January 7 be extended.

B37-1

My primary concerns are traffic, traffic, traffic, and congestion, congestion, congestion in San Pedro. As you know, there are only 2 avenues to serve and access our town, Gaffey and Western Ave. Today with no additional housing development in town, Western Avenue, in its entirety, at most hours of the day is beyond reasonable congestion. I see no plan that could adequately mitigate this situation. What actually do you think you could do to mitigate an additional 800-2200 car trips per day above what is already a frustrating situation.

B37-2

LADWP has aging equipment. The demands of a project like Ponte Vista will exacerbate this condition.

B37-3

San Pedro has too many condos now and not enough single family homes.

I support R1 zoning and oppose alternative A and C in this project. I have lived here 33 and a half years. Please don't "sell our town out" to the developers.

B37-4

Respectfully,

Mary Hester  
1609 Dalmatia Dr.  
San Pedro, Ca. 90732

From: **Steven Gonzalez** <[gonzosteve@cox.net](mailto:gonzosteve@cox.net)>  
Date: Wed, Jan 2, 2013 at 9:16 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Happy New Year,

I sincerely hope that we can keep Ponte Vista an R1 zone. San Pedro is a unique place with just a small egress and ingress. Most large cities have several ways in and out of town, but not San Pedro. We are very limited because of our location on a peninsula. It would be very unwise to overbuild on such a small access point when you consider the impact overall on our town.

B38-1

Thank you for your consideration,

Steven Gonzalez

From: **Chris Stagnaro** <[cstag@pacbell.net](mailto:cstag@pacbell.net)>  
Date: Wed, Jan 2, 2013 at 9:20 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Erin Strelich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

I am writing to express my concerns over the proposed rezoning for the Ponte Vista project site in San Pedro. The project site is currently zoned R1. That is the zoning that was in place when the project site was initially purchased. And that is the zoning that I feel should remain in place on the project site.

As an individual home owner in the area I am not allowed to have my lot rezoned to allow me to construct multi-family housing. There is no good reason why speculative developers should be allowed to rezone their property after the purchase. The developers were fully aware of the zoning of the property at the time of purchase.

The Draft EIR contains an alternative for development within the existing zoning for the property. It is presented as Alternative B. Interestingly the developer chose to not include an access road to Mary Star of the Sea High School in this alternative, even though today they are providing access to the school. So they created an alternative that local residents would find more attractive (single family housing) that denies the high school access from Western Avenue to make it less attractive. In their presentation of the alternative they site the fact that they developer over paid for the property as a reason that the home prices would be high and possibly not supported in the current economy. Such speculative purchasing during the housing price bubble is one factor that lead to housing prices rising above their sustainable market rate that led to the bursting of that bubble and the resulting economic impacts. There is no reason to reward the speculative greed that contributed to our current economic troubles. The owners of single family residences that are under water today I'm sure would also like to have their lots rezoned so they can put up condos and recoup their investment. But such a request from an individual home owner would not even be considered. Large developers should not be given special treatment.

**Alternative B: No Project Alternative/Single-Family Homes**

Alternative B presumes that the Project Site would be redeveloped according to existing zoning- and General Plan designation-allowed uses and densities. Taking site planning



considerations into account, including the required seismic setback, approximately 385 single-family homes could be developed on the Project Site under the site's existing R1 zoning and Low Residential General Plan designation. Alternative B would not include a 2.8-acre public park or an access road to Mary Star of the Sea High School from Western Avenue.

B39-2  
(Cont)

The Draft IER identifies 571 vehicle trips during weekday morning peak hour and 699 vehicle trips during afternoon peak hour. I live in the track of homes referred to as Rolling Hills Riviera to the south west of the project site. Weekdays I take my daughter to school accessing Western Avenue from eastbound Delasonde Drive onto northbound Western Avenue to eastbound Palos Verdes Drive North to Rolling Hills Preparatory School and then proceed to the Harbor Freeway to go to work. During non-school months I follow the same route to the Harbor Freeway to go to work. Accessing Western Avenue is already a hazardous endeavor. The addition of another 571 vehicles to this already taxed roadway into San Pedro will make this worse and will directly impact myself and my family. There are so many variables that impact the flow of traffic already including unpredictable students crossing Western Avenue that I have low confidence that the proposed changes will offset the additional traffic the proposed project will generate.

B39-3

Note that alternative B identifies that it would reduce or avoid the significant impact to traffic in the Project area. So current zoning is consistent with the traffic capacity of the project area.

The Ponte Vista property was zoned R1 when it was purchased. It should remain zoned R1. That zoning is consistent with the traffic capacity in the area and the resulting community will be more consistent with the surrounding neighborhoods.

B39-4

Thank you,

Chris Stagnaro  
1958 Galerita Drive  
Rancho Palos Verdes, CA 90275

From: **william stallman** <[stallman1@gmail.com](mailto:stallman1@gmail.com)>

Date: Wed, Jan 2, 2013 at 10:04 PM

Subject: Ponte Vista Developement

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please keep developement zoned R-1. William Stallman 1973 Galerita Dr. R,P,V, 90275



B40-1

From: **Ferree, Adrienne B.** <[abferree@lasd.org](mailto:abferree@lasd.org)>  
Date: Wed, Jan 2, 2013 at 10:06 PM  
Subject: Ponte vista development  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Ms strelich I live in the neighborhood across the street from this proposal. 1135 dwelling is way too many! The impact on western and the middle school which all the kids from the new developemet will attempt will drastically affect our neighborhOod. Please keep the single family home zoning for that area. Alternate B.

Thank you,

Adrienne ferree

Adrienne-----

Sent from my BlackBerry Wireless Handheld

B41-1



From: **Evon muaina** <[evonmuaina@gmail.com](mailto:evonmuaina@gmail.com)>  
Date: Wed, Jan 2, 2013 at 10:34 PM  
Subject: Ponte Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

I am a homeowner in the Eastview area and have lived here for almost 30 years. I know this area. I know what impact 1100 plus units (with 1/3 being rentals) would have on this area. The area cannot handle anything more than what would be permitted under R1. Traffic is a huge concern, keeping in mind that there are really only two streets for emergency exit of the area. Please keep this development R1 as it is currently zoned. Thank you for your consideration.

Evon Muaina

Sent from my iPad

B42-1



## Erin Strellich

Planning Assistant | EIR Unit  
City of LA | Dept of City Planning  
200 N. Spring St, Rm 750  
Los Angeles, CA 90012  
Mailstop 395  
P: (213) 978-1351  
F: (213) 978-1343  
[erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

"How inappropriate to call this planet Earth when it is clearly Ocean."

— **Arthur C. Clarke**

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

From: **Greg Wilson** <[gwilson23@gmail.com](mailto:gwilson23@gmail.com)>  
Date: Thu, Jan 3, 2013 at 12:38 AM  
Subject: Ponte Vista  
To: [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

Erin,

Please keep the Ponte Vista development at it's current zoning of R-1, 385 units. It was zoned R-

1, 385 units for a reason.

Thanks,

Greg Wilson  
1841 Avenida Apenda  
RPV

B43-1

From: **Joyette Mosich** <[marmy1025@yahoo.com](mailto:marmy1025@yahoo.com)>  
Date: Thu, Jan 3, 2013 at 7:36 AM  
Subject: Point Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep the Pointe Vista project to R1...Single family homes.

Joyette Mosich  
2010 Galerita Dr  
Rancho Palos Verdes, Ca90275

Before this area was annexed by RPV it was San Pedro.

B44-1

From: **Jeff Koehler** <[jkoehler@pacbell.net](mailto:jkoehler@pacbell.net)>  
Date: Thu, Jan 3, 2013 at 8:06 AM  
Subject: Ponte Vista Development  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Ms Strelich,

As a resident of Rolling Hills Riviera (28039 Calzada Dr) I strongly recommend the zoning for the Ponte Vista Development be kept at R1 which I believe is Alternative B in the DEIR. A development of 385 houses would have much less negative impact on the surrounding neighborhoods than a development of 1135 units.

Respectfully,  
Jeff Koehler



B45-1

From: **Michael A DiBernardo** <[mdibernardo@sbcglobal.net](mailto:mdibernardo@sbcglobal.net)>  
Date: Thu, Jan 3, 2013 at 8:19 AM  
Subject: Ponte Vista DEIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Good day Erin

My name is Mike DiBernardo and I am a resident at 28218 Pontevedra Drive in Rancho Palos Verdes. My backyard butt ups to Western Avenue. I understand the DEIR for the Ponte Vista project is exploring different alternatives. Due to traffic congestion that already exists on Western Avenue I would like to recommend the LA City Planning Department keep the development zoned R1 and therefore I support Alternative A.

B46-1

Thank you in advance for your consideration in my recommendation.

Sincerely

Mike DiBernardo

From: **bill marks** <[billmarks43@hotmail.com](mailto:billmarks43@hotmail.com)>

Date: Thu, Jan 3, 2013 at 8:30 AM

Subject: Ponte Vista

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please retain the R1 zoning for the Ponte Vista development.

We have lived across Western Avenue from the Ponte Vista property for 40 years. In that time we have seen the traffic congestion on Western Avenue increase to the point of gridlock as development of residential and retail has filled in most of the vacant land remaining in the area.

Adding another 1100+ residential units to the area will dramatically increase the burden on the already over-taxed infrastructure.

Please do not let this happen!

William D and JoJean H Marks  
2035 Avenida Feliciano  
Rancho Palos Verdes, CA 90275

B47-1

From: **Elaine & George** <[g.carnegis@cox.net](mailto:g.carnegis@cox.net)>  
Date: Thu, Jan 3, 2013 at 8:47 AM  
Subject: Ponte Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Please keep Ponte Vista development R1. Traffic on Western Avenue is very heavy because there are only 2 streets, Gaffey Street and Western Avenue, that take drivers to San Pedro.

B48-1

Thank you.

Elaine & George Carnegis

1937 Delasonde Drive

Rancho Palos Verdes

From: <[michael.grant1@cox.net](mailto:michael.grant1@cox.net)>

Date: Thu, Jan 3, 2013 at 8:57 AM

Subject: Pointe VistaENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.biscaino@lacty.org](mailto:councilmember.biscaino@lacty.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Cc: michael grant <[michael.grant1@cox.net](mailto:michael.grant1@cox.net)>

ALCON, I would like to voice concern in allowing this developer to try and sell this project as beneficial to use and that we should forget the property was R1 zoning when it was purchased. The developer trying to expand the housing from 385 to 1135 is a clear indication that this developer is in it for the "hit and run" and their actions are shameful. Please keep the development R1, as it is currently zoned. Thank you for your time. Mike and Julie Grant

B49-1





January 3, 2013

RECEIVED  
CITY OF LOS ANGELES

JAN 23 2013

ENVIRONMENTAL  
UNIT

Ms Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Ponte Visa ENV-2005-4516-EIR – Comments in regard to Hazard

Dear Ms Strellich,

I live about a mile from the Rancho LPG facility covered in the Draft EIR for Ponte Vista, and find that the authors' dismissal of the hazard associated with this facility as insignificant is unreal and untrue. My comments explain why that is so.

I have a masters' degree in chemistry education and have worked in the oil industry for Conoco and Fletcher Oil, now closed, in Carson, as environmental manager. I ran my own business as environmental consultant for about 20 years, retiring in 2010. Many of my clients were oil companies, including ARCO refinery (now Tesoro), Shell refinery, and smaller refineries and terminals. I was a member of the AQMD's Advisory Council for about five years, a member of the LATS (refinery) subcommittee of the Western Oil and Gas Association, and of the refinery subcommittee of the American Petroleum Institute. My experience in the oil industry, specifically in refineries and terminals, gave me a healthy regard for safety and for the means at hand to deal with possible releases. (Although my job was mostly desk work, I also toured the refinery regularly, did valve inspections, etc. I therefore had to receive training in fire-fighting. I ran drills along with the Safety Department that involved police, fire departments and near-by schools, practicing how we would handle a release.) One could be confident in an element of safety because of the systems in place to control and extinguish fires. Because I was the environmental manager, I was informed about any accident that occurred on site. And accidents small or large occurred regularly, mostly due to operator error, but only a few had major consequences, and no lives were lost.

B50-1

But LPG (butane and propane) are completely different from the usual products in a refinery. This is because they become gases when released and in doing so increase greatly in volume to form a pressure wave. Other hydrocarbons have to be vaporized before they will burn, but LPG vaporizes readily if it's released. These gases are heavier than air, but lighter than water as a liquid. So, they will not dissipate easily as Liquid Natural Gas would do. The usual methods of fighting an oil fire won't work on LPG. This is to use foam mixed with water, which smothers the fire. But with LPG the foam serves to warm whatever LPG is still liquid, hastening vaporization. So LPG is essentially unextinguishable, except for hand-held dry chemical, whose use is limited to very small releases. Finally, the use of containment or dikes to hold a release do not work in the case of LPG, because they are designed to hold the liquid contents of a tank, but the liquid quickly vaporizes, expands 230 times in volume and overflows the containment.


B50-2

B50-3

To dismiss the danger from an LPG facility as insignificant flies in the face of the scientific knowledge about these products. The possible means of causing a release are human accident, equipment failure, earthquake potential, and terrorism. The potential for a catastrophic event at either Rancho, or to a lesser degree, at ConocoPhillips is real. The only sure mitigation would be the removal of LPG storage near homes and the public. At the least, the city should require mitigation in the form of insurance to cover the neighboring communities, as well as the city's potential liability.

B50-4

Sincerely,



Connie Rutter

Refutation of Rancho LLC Holdings as Insignificant  
in the DEIR for Ponte Vista, January, 2013

In the Hazards section of the DEIR Rancho LPG Holdings was considered to have “no impact”<sup>1</sup> on the Ponte Vista project. However, the author of the DEIR did not do any analysis or full reporting of the contents of the RMP on file at the Fire Department. For example, under the section about ConocoPhillips the DEIR says: “Under the RMP’s offsite consequence analysis, a flammable worst case release of butane (rupture of the largest bulk storage tank releasing the entire contents of 24,800,000 pounds) could result in a vapor cloud explosion with an impact zone of 2.3 miles.”<sup>2</sup> In comparison to that impact zone, Rancho with larger tanks is claimed to have an impact zone of 0.5 miles.<sup>3</sup> Notably, the weight of butane released from Rancho under its worst case analysis is not reported. According to Rancho’s RMP on file at the Fire Department, the weight that would be released when one of the butane tanks fails is reported as 57,000,000 lbs.<sup>4</sup> It flies in the face of reason to assume that a weight more than twice as large would have an impact zone radius of less than 20% the size of the ConocoPhillips refinery. Actually, the impact zone reported is the **radius**, so comparing the areas reported would make Rancho’s effect only 5% of ConocoPhillips. How can this be? It’s illogical that twice the weight of butane (Rancho’s) would effect only 5% of the area (ConocoPhillips).

B50-5

**Source of Confusion over ‘Worst Case’**

The answer is that the two facilities used different ways of calculating the worst case, and unfortunately, both are legal, according to the EPA regulations<sup>5</sup>. A brief history of how the regulations were influenced by a settlement of a suit by the American Petroleum Institute (API) follows.

Congress passed two sets of laws (CERCLA<sup>6</sup> in 1986 and the Clean Air Act Amendments<sup>7</sup> in 1990) in response to the Bhopal disaster in India, which killed thousands due to a release of poisonous methyl isocyanate. The EPA finalized the regulations<sup>8</sup> in 1996, which would require companies which had hazardous chemicals on site to, among other things, file a worst case analysis of the effect of a release. The reports were to be filed by June 21, 1999. Official Guidance was produced as to how to calculate the effect. Butane and propane were to be calculated in comparison to the explosive, TNT. (This is apparently how ConocoPhillips calculated their worst case.) According to that method and using the 57,000,000 pound figure, Rancho’s worst case gives a radius of **three miles**. (At a neighborhood meeting where notes were taken, a representative of Amerigas, the previous owner of the Rancho site gave the radius as 2.8 miles<sup>9</sup>).

B50-6

But the API and the National Propane Gas Association sued the EPA over the RMP regulations, specifically as they related to LPG (Liquefied Petroleum Gas, butane and propane). API claimed that LPG owners should be allowed to calculate the release amount as the amount that would be released in 10 minutes, if there was “passive

<sup>1</sup> “Ponte Vista DEIR,” p. IV.H-36. <sup>2</sup> *ibid.* p. IV.H-33. <sup>3</sup> *ibid.* p. IV.H-36.

<sup>4</sup> “RMP Report for San Pedro Terminal” p. 3. <sup>5</sup> 40 CFR Part 68.25. <sup>6</sup> Comprehensive Environmental Response, Compensation and Liability Act, 40 CFR 372.45 ff.

<sup>7</sup> CAAA, 112 (r). <sup>8</sup> 40 CFR Part 68. <sup>9</sup> Amerigas Forum meeting held by NW Neighborhood Council, 7/18/04.



mitigation” present on site. The passive mitigation on site is an impound basin sized to hold the contents of one tank as a liquid. The problem is that butane is stored at 28°F at Rancho, and it boils or vaporizes at 31°. When butane vaporizes, it expands 230 times its volume as a liquid! So the impound basin would hold less than 1% of the volume of butane when it vaporizes, which it will do very rapidly. In actuality the impound basin is more cosmetic than protective. This fact seems to have escaped the notice of the API, whose standard it is, as well as the EPA, which accepted the concept of the impound basin as ‘passive mitigation’. The EPA settled the suit with the API, within one month of when RMP’s were due in June 21, 1999, allowing LPG facilities with passive mitigation to use modeling as well as the TNT equivalency method. Now a company storing butane can report its worst case according to the Guidance or according to some model which calculates the amount released in 10 minutes, but the EPA does not specify what model to use. The resulting confusion ended up with worst cases which are not comparable, because different methods of calculations were used, and all legally, but not all true, and certainly not all equally protective of the public, or fulfilling Congress’ original intent.

B50-6  
(Cont)

**What would a Genuine Rancho Worst Case Look Like?**

The EPA set the amount to be evaluated, as the complete failure of the largest tank on site. There are two tanks of butane whose capacity is 12.6 million gallons each. Companies are allowed to assume ‘administrative controls’ are in place which would allow for a reduction in the spilled amount to be evaluated. The 57,000,000 pounds reported by Rancho in their RMP assumed that the volume spilled was (butane weighs 4.86 lbs /gal) 11,700,000 gallons or 93% of tank capacity.

As that volume was released, it would pick up heat from the air and from the floor of the ‘impound’ basin and vaporize. As it vaporized it would expand, explosively, until it overflowed the basin. This type of explosion occurs because one gallon of liquid butane now needs 230 gallons of space to exist as a vapor, which creates a destructive pressure wave. Since butane is twice as heavy as air, it would flow out of the basin, as it vaporized and expanded, and follow gravity into the adjacent storm drain and onto Gaffey Street. During its expansion, at its edges it would become diluted with air and pass through its flammability limits of 1.5 to 8.6 % butane in air. There are five sources of ignition on site in the three natural-gas fired compressors, the heater and the flare. The engines of passing cars can also serve as ignition sources. A flammable explosion would follow the ignition, which would add more heat to evaporate any butane that has not already evaporated.

B50-7

Under this scenario, it is almost certain that not just one tank of butane would evaporate, expand, explode, and ignite, but the entire facility would go up in flames. If the tanks were at or near capacity the radius of impact would be 10 miles. This would involve most of the area south of LAX.

**Likelihood**

The DEIR states that the chance of a release as large as a whole tank at the Rancho facility is ‘remote.’ Although that is true, ‘remote’ is a relative term. Probabilities are usually given as fractions like one in a hundred or percentages. The chance of an entire tank failing is small but not zero. What makes the possibility so dangerous in the case of LPG is that there are no safety measures that can protect against this possibility and

B50-8

**no safety measures that can be taken, after it occurs.** The EPA in their “Technical Guidance for Hazards Analysis” on page 2-32-33 provides a matrix for evaluating hazards considering probability and severity. The release of a large amount of butane (57,000,000 lbs in this case) would be low probability, but high severity. (Even at the Rancho-reported radius of ½ mile from the blast, they report **770 people** would be ‘affected.’ The number affected under the TNT-equivalent calculation would be closer to 28,000.) EPA says: “In general, the events with likelihood rankings of high-high, high-medium, medium-high and medium-medium will require some additional and possible mitigating measures. **However, other less likely scenarios may also have serious consequences and be of high concern in a particular community and would warrant the focus of emergency planning.**” The problem, of course, and what makes the Rancho situation so dangerous, is that there are no means of mitigating the threat from this type of facility, as pointed out above. Since butane is non-extinguishable by any means available on a large scale, once it’s out of a tank, it will in all likelihood ignite. The recommended method of dealing with a fire of this sort is to try to keep other tanks from catching fire and to let it burn itself out!

B50-8  
(Cont)

LPG (butane and propane) is considered ‘ultra-hazardous,’ ‘extremely hazardous’ and extra-hazardous activity. The definition of ultra-hazardous is based on the Restatement (Second) of Torts Section 520. “In determining whether an activity is abnormally dangerous, the following factors are to be considered: (a) existence of a high degree of risk of some harm to the person, land, or chattels of others; (b) likelihood that the harm that results from it will be great; (c) inability to eliminate the risk by the exercise of reasonable care; (d) extent to which the activity is not a matter of common usage; (e) inappropriateness of the activity to the place where it is carried on; and (f) extent to which its value to the community is outweighed by its dangerous attributes.” (from Legal Information Institute.)

**LPG Accidents and Probability**

In a paper, “a Study of Storage Tank Accidents” by James I Chang and Cheng-Chung Lin, reported in the Journal of Loss Prevention in the Process Industries in 2006, tank accidents occurring from 1960 to 2003 were evaluated and analyzed. Of 242 accidents reported 15 involved LPG.

B50-9

Another document “Storage Incident Frequencies” from the International Association of Oil and Gas Producers in 2010 reported on page 5 that the ‘catastrophic rupture frequency’ for single containment refrigerated tanks (the butane tanks at Rancho) with secondary containment (the ineffective impound basin) is  $7.3 \times 10^{-6}$  per tank per year. For the butane tanks, this would amount to  $5.8 \times 10^{-4}$  or 5.8 in 10000. This is better odds than most lotteries. The same document gives the BLEVE (boiling liquid expanding vapor explosion) frequency as  $10^{-5}$  per vessel-year. The total expected frequency of a BLEVE in the Rancho propane bullets is therefore  $2 \times 10^{-3}$  or 2 in 1000.

A random search of internet sources produced the following:

\*In Feyzin, France in Jan., 1966 90,000 gal of propane were released from a 317,000 gal spherical pressure vessel when a valve failed to work, killing or hurting 100 people.

\*In Mexico City in November, 1984 2,900,000 gallons of LPG were released with the cause unknown. This resulted in 542 fatalities and 7,000 people hurt. Two thousand homes were destroyed.

\* In 1977 a 260,000 bbl propane tank failed massively in Qatar. This caused a neighboring butane tank to also catch fire and be destroyed, resulting in \$179,000,000 loss.

So, although releases are relatively rare, they do occur, and often result in death and damage.



B50-9  
(Cont)

**Other Points Which Pertain to Safety at the Site**

In the DEIR the authors dismiss the danger from fire partially because the facilities have methods to reduce the fire danger by foam systems and workers trained in fire-fighting. **It's important to realize that neither foam nor water will extinguish an LPG fire; both will actually increase the rate of burning.** So, an LPG fire is usually allowed to burn itself out.

There are several points to be made about the lax attitude toward safety at Rancho. These points were made in an email to Mary Wesling of EPA, after reviewing Rancho's RMP. I am including that document. What seems apparent is that little thought went into the preparation of the RMP.

And we know that the facility is staffed with few employees. There are at most 12 employees, to cover the site for every shift every day. This means that at most there are three or four employees on site at any one time. But the site covers 20 acres! I asked an employee if there is a maintenance crew on site and he said one crew covers this facility and another one, possibly in Shafter. So, what do they do if something breaks? If they're really aware of the dangers, they will evacuate as quickly as possible.

B50-10

**Conclusion**

Butane is essentially unsafe, because of its qualities of volatility (it's a gas at temperatures above freezing), expansion potential (when it vaporizes, it expands 230 times in volume), flammability (other hydrocarbons have to be heated to vaporize at ambient temperature before they will ignite, but butane is already a vapor at ambient) and inextinguishability. Butane floats on water, so spraying with water can only help to cool surrounding tank surfaces in the hopes that they will not ignite. If water were applied to a burning pool of butane, it would help to float and move the burning fuel to a larger area. Foam, usually used to extinguish hydrocarbon fires by smothering, is not advised by the National Fire Protection Association or the API, because the foam is warmer than the liquid butane and would therefore hasten vaporization. (Dry chemical will extinguish butane, but is usually in small containers and must be sprayed on the fire directly, so its usefulness is limited to small, accessible butane fires. This also runs the danger that the fireman spraying the chemical must be so close to the fire that his life is put in danger.)

B50-11

Rancho LLC Holdings is probably the most dangerous facility near the Port. I haven't even mentioned the likelihood of earthquake potential – Rancho is located within the rupture zone of the Palos Verdes fault. Nor the attractive nuisance that this facility would be to an international or "home-grown" terrorist.

To dismiss the risk from this facility as 'insignificant' is dead-wrong.

### Problems with Rancho's Risk Management Plan

There are several problems associated with Rancho's compliance level in regard to the requirement to prepare an RMP and an Emergency Response Plan. An important one is the indifference, illustrated in errors and delays, which indicate a lack of concern with the hazards in their facility. This is disturbing, since the hazards are so extreme, labeled as 'highly hazardous' in 29 CFR 1910.119.

Rancho's Risk Management Plan essentially follows Amerigas' in its worst case scenario, releasing 57 million lbs. of butane (11,728,000 gal or 93% of tank 1 or 2 capacity.) (I have a copy of Amerigas' version with the Fire Department through a fluke, but was not allowed to have a copy of Rancho's; only allowed to 'make notes.')

As, of course, you know, 40CFR 68.12 requires that the source select a "Program," which will determine its worst case scenario in the RMP. Rancho falls into Program 3, because it is subject to OSHA project safety management standards under 29 CFR 1910.119, because butane and propane are listed as highly hazardous chemicals, as category 1 flammable gases.

### Serious defects

The **most serious defect** is in calculating or estimating from a table, the distance to the 'end point of 1 psi for a 'worst case' release, which both Amerigas and Rancho stated was 57,000,000 pounds, or 11,700,000 gal, which is 93% of the butane tank's nominal capacity. This is presumably because the owner is allowed to take credit for "administrative controls" mentioned in 40 CFR 68.25 (b)(1). But, using the application that assumes that the 'passive mitigation' afforded by the impound basin, the amount released would be 10% of the total spill, since the area exposed to the air, and therefore subject to evaporation, would be limited. But they greatly underestimated the distance to the endpoint of 1 psi. I'm presuming this was due to sloppiness and indifference, which is evident in the rest of the document. The actual endpoint is **3 miles**, according to the formula given in the Guidance at C-1. I presume whoever did the calculation or estimation worked for Amerigas, and their results were simply copied by Rancho. And I'm guessing that whoever came up with the distance of 0.5 miles, assumed that he was to use just 10% of the release amount, 5.7 million pounds and used the Reference Table 13, which ends at 2,000,000 lbs, well below the 57,000,000 lbs of their release.

What is disturbing about this to a resident, is that this indifferent attitude to the environmental and safety rules is probably indicative of their attention to safety within the facility.

For other substantive defects:

1. The Plan has the earliest reports of a release being made to company personnel (p.2-3) at Plains Control Center (in Shafter? Houston?) not the Fire Department. This would obviously delay action on an extreme emergency, and could even lead to an attempt to minimize the reaction to a release, or to a cover-up. (There was an accident in late March, when a rail car and truck collided, which members of our group observed, but no Firemen were notified. There was a notification to the police, apparently.)
2. On page 3-6 directions are given for a 'hydrocarbon vapor' release, and they give directions about noting the wind and how to move upwind of the release. They should also be reminded to move up-hill from the release, since both butane and propane as vapors are heavier than air, and so would flow downhill.

B50-12



3. On the same page the authors give directions about putting out an ‘incipient’ fire, but do not speak about the difference in behavior of propane and butane or the danger of re-ignition of the spill. Presumably they have already had this sort of training, but the Plan deals with releases, so it seems it should be repeated here.

4. On page 3-13 under “Line Break” they note to “Request local authorities to establish scene security and traffic control in the area..” But it’s the 7<sup>th</sup> notation under Line Break. Since this site is on the main road in San Pedro, this should be among the first things they do.

5. On the same page, under Leak or Spill at Loading/Unloading Rack, it is noted: “Consider evacuation of local residents.” The Fire Department and Police would be the agencies to accomplish this, but they haven’t even been notified under this scenario!

6. After this leak at the loading rack, they say, “Resume loading/unloading operations as directed by Facility Supervisor.” But the spill hasn’t been cleaned up! Since these gas/liquids are colorless and odorless, it wouldn’t be possible to tell if they had evaporated and dispersed! There should at least be some requirement to use a hydrocarbon analyzer and to specify the reading at which it is safe to resume loading activity.

7. On page 4-4 reporting to external agencies is done through corporate Environmental, Health and Safety, rather than from the site. This raises questions about whether the corporate office has the proper information and whether they might be inclined to fudge the issues. There is a defensive note to their items not to include information which hasn’t been verified and not to speculate. These considerations will have the effect of decreasing the urgency, and perhaps the honesty, of the reporting to public agencies. Since the threat at the site is so great and a release of any significant size will need the involvement of Fire, Police, and Port personnel, there shouldn’t be any attempt on the part of Rancho to curtail reporting.

8. To make the Plan more user-friendly, the telephone numbers for notification should be included in the plan, not just at the Terminal building – what if the Terminal building is involved in the fire or release?

9. Figure 5-2 gives the Response Team organization, using specific titles for the boxes, and it refers to Figure 4-3.1, but the two don’t match. The titles listed on Figure 5-2 are more likely the Management Team, while the names listed on Figure 4-3.1 are probably the Response Team. Besides, there are more boxes on Figure 5-2 than there are names on Figure 4-3.1.

10. The Plan speaks of rally points and muster points, (page 7-3) which are presumed to be the same, and are at the north and south end of the terminal. **But, if a release of butane or propane has occurred, the vapor, which is heavier than air, would flow down hill, after the vapor had filled up the impound basin. So, the south rally point should be used only if a hydrocarbon analyzer has indicated that it is safe.**

11. On page 7-3 and 4 the Plan says that no one is to leave the site. Employees should not be instructed not to leave. A release of LPG is life-threatening and, other than turning off the source of the leak, little can be done to control the resulting fire. The first goal should be to minimize the loss of life to employees and the public.

12. On page 7.6 the Plan instructs the Incident Commander to notify “emergency management authorities” (Fire and police?) whether public protection measures should be

B50-12  
(Cont)



taken, presumably evacuation. This should not be Rancho/Plains' call, but the local agencies'. Rancho/Plains makes it clear in this Plan that the risk they are concerned with is not to the public, but to their own reputation and pocket-book. (They're not even savvy enough to disguise it.)

13. On page A-2 there is no attempt to describe the qualities of propane and butane. Instead there is a vague sentence "Chemical products are the primary fire hazards in the facility." **This is a glaring omission, to not describe the extreme hazard presented by LPG, and its qualities which make it so difficult to control because of its volatility, flammability and inextinguishability.** .

14. On page A-3 under "Pressurized Hydrocarbon Vapors" at the second bullet, it's stated: "Extinguishing agents are water fog pattern sprays or dry chemical." Water fog or spray will not extinguish a fire, because the liquid and vapors will float on the water. It may temporarily break up the vapor, but that would only cause the vapor to disperse and mix with air and so reach its lower flammability limit of around 1%. In addition the API does not encourage the use of dry chemical, even though it will extinguish fires, because of the possibility of a fire reigniting and trapping the fireman.

15. Fire-fighting foam is not recommended by API, because it will warm any liquid and cause it to become vapor, increasing the likelihood of fire.

16. On the February, 2012 update, on page 3-13 under "Rail Car Derailment," notifying the fire department and police (not the sheriff, as stated in the Plan) should be closer to the top. Also the Port police and possibly CHP should be notified. (But there's a good piece of information about assessing the damage from a distance through binoculars, to prevent loss of life of operators and fire and police personnel.)

17. On page 3-29 of the Feb, 2012 update, there is an Earthquake Procedure Checklist. The previous page says that if spills or releases occur as a result of the earthquake, then employees are to follow the procedures under those headings. But this page tells them to stay where they are during the quake. This is impossible, of course, to respond to the spill while staying in place. And there is no mention of the fact that land lines may be down, and that the Fire and Police will be stretched to try to cover related earthquake damage.

18. On the same page, 3-29, there is a notation under "After an earthquake checklist" that the employees are to inspect the seismic shutdown switch , but it doesn't give any further instructions about it, nor does it indicate where it is. Shouldn't that be noted in the Plan and/or on the Plot Plan? What should it be inspected for? Damage? Whether it shut down properly?

#### Indifference to Compliance

Some of the sloppiness and indifference can be detected in using an 'off-the-shelf' program, rather than analyzing their own situation and the rules which pertain to them.

1. This led to at least one omission in the earlier plan, dated, I presume, May, 2008, (before Rancho owned the facility?) and revised Jan 13, 2011 and again in Feb, 2012. In the first two versions they omitted the section on earthquake, but added it in the 2/12 version.

2. The Risk Management Plan is to be updated every year, but according to the records you sent me, there were no updates between 2008 and 2011.



3. Several places, starting on page 3-7, they refer to Section 2-3, but there is no Section 2-3. (This would indicate that no one even proof-read their submission.) They correct this in the latest version of the Plan.

4. On page 3-7 the Supervisor is instructed in the fourth bullet down to “Assist in other communications/notifications as directed by Incident Commander.” But the Supervisor is the Incident Commander, according to page 3-4. The sixth line down directs the Supervisor to “Coordinate initial internal and external notifications.” This is a repeat of the instructions given above.

5. Page 3-12 repeats the information from pages 3-6 and 3-7. This may be because they are giving directions to fight a BLEVE, as opposed to a release from a tank.

6. On page 3-14 there are directions about what to do for a storage cavern leak, but this site has no storage cavern. This is just evidence of the careless use of information from another site without even bothering to proof read it.

7. On page 4-5 the authors appear to not understand what is wanted, at least according to my reading. Reportable Quantity is a term from the regulation, which is 10,000 lbs for butane and propane, not the maximum amount on hand. This oversight was not corrected on the February, 2012 version, which leads one to wonder if anyone read the regulations and their own submissions. (It’s this kind of sloppiness and indifference which makes us residents worry about their attention to safety. Since safety in regard to LPG is such an iffy notion anyway, one is not reassured to see such carelessness!)

8. On page 5-2 part of the Emergency Management Team’s directions are to deal with the public, media, etc. Only on the fifth bullet down do they refer to the Response Team and external calls. The entire emphasis is on public relations, and not on reducing the danger!

9. Page 5-3 introduces new terms: Field Response Team, Crisis Manager, and Corporate Response Team. This is confusing – the same terms should be used throughout the Plan.

10. Figure 5-3 supposedly gives the Emergency Management Team, although here it’s called “Corporate Response Team.” It gives the impression that the company is thinking much more in terms of its reputation, than of the safety of residents. As it is, it’s too unwieldy to be practical in dealing with an emergency.

11. Page 5-10 spells out the duties for the Incident Commander. “Request additional response resources, as necessary” is on the fifth line, but these would have to be from the Fire Department and or their mutual aid group, and there is no mention of having contacted them in the first place. That would surely be his first move, if he understands the nature of the threat he’s working with.

12. On page 6-12, decontamination applies to toxic substances, not flammable, so it’s confusing to have that as part of the safety rules.

13. Page 6-19 seems to refer to oil and other petroleum products, rather than LPG.

14. Page 7-3. At the bottom of 7.1.4 there is a reference to section 5.6, but there is no 5.6.

15. The page facing page 7-10 is illegible for the most part.

16. On page A-3 Propane and butane are listed as flammable and combustible liquids, but they are gases at standard temperature and pressure. The same is probably also true of ethyl mercaptan.



B50-12  
(Cont)

17. The potential ignition sources listed on page A-3 don't include the actual ignition sources on-site, the 3 compressors, the flare, and the heater.

18. On page 3-14 of the Feb. '12 update, the plan seems to have been patched together from another source, because it gives directions about a storage cavern, which I don't believe exists on the site, and the FBI office in Kalamazoo.

19. On Figure 4.2-1 of the February update the wrong numbers are still used for reportable quantities. Instead terminal capacity numbers are used, but the number for propane has to be incorrect.

20. Figure 4.3-1 of the February, 2012, update lists entities that are to be notified. Cooper Day School and Taper Elementary are listed twice.

#### Other questions

1. They do not identify an Emergency Radio Channel. Do they have one? If so, shouldn't it be identified in the Plan? If they don't have one, should they?

2. They will use an air horn to warn employees, according to page 2-4. How would employees know what type of emergency is occurring? Is there some pattern of horn blasts that would serve as a communication? If so, that should be stated in the Plan.

3. They mention a safety orientation for visitors to the site (p.2-5). Did this occur when you visited the site? Did it happen when there was the multi-agency 'inspection' on May 12, 2011?

4. On page 3-6 they say that employees should notice the wind direction. Is there a wind sock or vane on site and visible from all parts of site?

5. Page 4-7 mentions sirens, alarms and beacons. If they don't have these on site, they shouldn't be in the plan.

6. Page 4-8 lists company personnel with phone numbers. Aren't there more than five?

7. Under 4.3-1, Notifications, shouldn't there be a notification of their truck fleet, also to make sure that trucks don't arrive for pick up or delivery?

8. It's not clear how Figure 5-4 and 5-3 are related.

9. Page 5-13 mentions an 'Incident Action Plan.' Is this the same as the Emergency Response Plan? An Incident Action Plan has not yet been generated, according to the order of the duties described. This same page refers to a Site Specific Health and Safety Plan. Shouldn't there be some indication of where it can be found?

10. On page 7-3 the second bullet talks of an evacuation alarm – is there a separate alarm for evacuation? Would visitors recognize the meaning of the alarm?

11. On page 7-10 it appears that the persons evacuated are going to be sited at the Police Station in the Harbor Division. Have the police been notified? What arrangements have been made?

12. On previous versions of Risk Management Plans, the company had to actually list their personal protective equipment with its location. Shouldn't that be done here? Is the equipment easily accessible, rather than having to be 'checked out' of the warehouse?

13. Page A-3 lists methanol under Flammable and Combustible Liquids. Do they store methanol? How much and where? It's not listed under the chemicals stored.

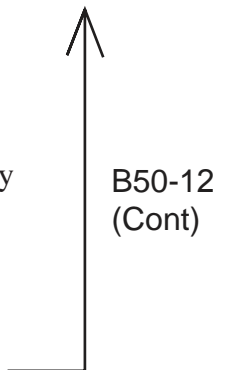
14. Under Rancho's February, '12 update, Figure 3.4-1 the authors recommend isolating the leak area for at least 330 ft. What is the rationale behind that?



B50-12  
(Cont)

Conclusion

This is about the worst level of compliance with just the letter of the law that I can imagine! (Having worked in environmental compliance, I am shocked at such a shoddy piece of work.) And to think that this site has been under the scrutiny of the neighborhood, and even with that level of attention, they couldn't do better than this. They should start all over again, and do a more competent job. This is certainly not an indication of compliance with the requirements of 40 CFR 68.



From: <[JBonaventura@mazakcorp.com](mailto:JBonaventura@mazakcorp.com)>  
Date: Thu, Jan 3, 2013 at 9:46 AM  
Subject: Vote NO Point Vitta DEIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I can't believe that the city of Los Angeles would even consider any expansion after the floundering Condo Project in downtown San Pedro

There has been a 2 year work stop on 8th and Mesa and the High Rise Condos on 6th and Harbor that went bankrupt

The residents that has purchased condos are in court over the state founding of low income condos / units

Before any other expansion is considered in San Pedro, finish what was started

I live below Western between 9th and Dotson, that stretch of Western is know as the San Pedro FWY there is NO TRAFFIC CONTROL!

Between 1st and Palos Verdes morning and evening Rush hour is impossible !!!

Week ends worse

If any thing, only single family homes, not built on top of each other.

Again I vote NO to Point Vista DEIR

John D. Bonaventura  
**John Bonaventura**  
**Service Support**  
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"How inappropriate to call this planet Earth when it is clearly Ocean."

— **Arthur C. Clarke**

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

From: **John Winkler** <[jhwinkler@me.com](mailto:jhwinkler@me.com)>  
Date: Thu, Jan 3, 2013 at 10:04 AM  
Subject: Ponte Vista (ENV-2005-4516-EIR)  
To: [Erin.strellich@lacity.org](mailto:Erin.strellich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org), [Joe.Buscaino@lacity.org](mailto:Joe.Buscaino@lacity.org)

Re: ENV-2005-4516-EIR  
Subject: Ponte Vista

In regards to the Draft EIR, the main focus seems to be 1,135 or 830 homes. This project is still too large for 61.5 acres of former Navy housing which only had about 225 homes. It should be noted that the community of San Pedro is not responsible for any party paying exorbitant amounts of money for the property (\$125 million) and trying to recoup their loses at the expense of those living in the area who will be impacted by additional traffic, noise and pollution. Please remember that the site is R-1 zoning and the only entry and exit is on Western Ave. It is unacceptable to add more traffic on Western Ave. when there is already heavy traffic.

B52-1

In the EIR there is language for alternative B which presumes the project would be redeveloped according to existing zoning. Approximately 385 single-family homes could be developed on the project site under the existing R-1 zoning and residential general plan designation. Alternate B would be the best choice keeping the development to a more modest amount at the same time keeping the zoning R-1.

B52-2

Please have the developers give the community a concept drawing of what 385 single-family homes would look like on 61.5 acres. Thank you.

John Winkler  
[Jhwinkler@me.com](mailto:Jhwinkler@me.com)  
[310 833-7455](tel:3108337455)

From: **John Stinson** <[president@sanpedroart.org](mailto:president@sanpedroart.org)>  
Date: Thu, Jan 3, 2013 at 10:07 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Erin

I have sent comments on issues that I think are relevant to the discussion of development at Ponte Vista. I think the R1 number of SFR's should be 291 to allow for the open space that should be part of this project. Looks like the developer can still make a profit (see attachment.) Infrastructure overload, configuration and lack of open space, a gated project and traffic are primary concerns.

B53-1

John Stinson  
President  
San Pedro Art Association

**Summary of Principal Comments**

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.

B53-2

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.

B53-3

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.

B53-4

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.

B53-5

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.

B53-6

7. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B53-7

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B53-8

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can't get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

B53-9

10. The fact that noxious fumes are emitted occasionally from the Defense Fuel Supply Point located next to the property is of particular concern as there is no plan to curtail them. That fact was made clear by the federal government when the property was originally sold.

B53-10

11. The community is now planned to be gated which was an option that was rejected by the Ponte Vista committee set up by former Councilwoman Janice Hahn to review the first plan of 2300 units. Gated communities are exclusionary not inclusionary and despite there being a few built in San Pedro quite a few years ago, they are not in keeping with the nature of most of San Pedro. Who are they trying to keep out anyway?

B53-11



**A. REASONS TO SUPPORT AN R1 ALTERNATIVE**

1. There are already too many unsold condos in San Pedro [balance issue].
2. A lot of the surrounding area are single family homes.
3. More condos and townhomes will compete with and undercut the plans to upgrade and renovate downtown San Pedro.
4. All three alternatives make no attempt to mitigate traffic impacts by providing work centers, recreation facilities and small convenience stores on site.
5. The traffic studies and proposed mitigations are inadequate. [see attachment A]
6. The present zoning includes 15 acres of Open Space; all three alternatives ignore that.
7. **Additional reasons brainstorming session.**

B53-12

**B. AN ADDITIONAL ALTERNATIVE SHOULD BE STUDIED THAT INCLUDES:**

1. Access to Mary Star from Western.
2. [Number] single family units.
3. On site work centers to encourage sales to people who can work at home several days per week. Centers could include video conferencing capability, high speed internet, etc.
4. Centers could also be suitable for student study halls, and as a library extension.
5. 15 acres of public recreation space, run by Rec and Parks.
6. Possible on site convenience store, coffee shop.
7. No gates, all streets public streets.
8. **Additional items to be included brainstorming.**

B53-13

### **C. COST DATA FOR R1 DEVELOPMENT**

1. The cost for D6 level quality for 2000 sf house is \$81.53
2. The cost for D8 level quality for 2000 sf house is \$136.52
3. Examples of each quality type are shown in Attachment B, along with the description of what is included in each.
4. Using the full cost of land at \$120 million, the cost per house including developer profit for each, assuming 385 units, is  
\$474, 748 for quality level D6, 2000 sf house.  
\$584, 730 for quality level D8, 2000 sf house.
5. Assuming 15 acres would be open space, unit level drops to 291 units. Price per unit changes to:  
\$575,435 for quality level D6, 2000 sf house.  
\$685,413 for quality level D8, 2000 sf house.

B53-14

**ATTACHMENT A**

**TRAFFIC**

**1. The traffic study improperly uses ITE trip generation data**

The DEIR uses midpoint data for each housing type while ignoring project characteristics. As it is, they estimate significant impacts at 20 out of 56 intersections in a 1135 unit development, nine in a 385 unit development..

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

B53-15

Each graph in the ITE manual has a wide range, obviously because the characteristics of each development is different. Using a proper point in the scale of each would greatly increase the V/C ratios and lower the LOS ratings at many more intersections among the 56 tested intersections.

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

The vehicle counts in the DEIR are lower than normal due to the impact of the economy on "real" traffic generation rates.

The DEIR counts were taken in 2010. They are lower than earlier counts by the same consultant in 2005 for the prior project, lower than the counts taken for the Target Store analysis in 2006 and lower than many of the counts for the Marymount project on Palos Verdes Drive North in 2011, after the installation of ATSAC/ATCS. For example, the V/C PM ratios for Western and PV Dr. North are

B53-16

2005	1.025	[Ponte Vista I]
2006	1.078	[Target]

2010	.851	[DEIR, present project]
2011	.872	[Marymount]

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

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

B53-16  
(Cont)

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

**Failure to Include Data from Other Projects**

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

- Southern California International Gateway (SCIG)
- APL Terminal expansion
- Ports O'Call Redevelopment
- Cabrillo Marina Phase II
- USS Iowa
- Los Angeles County Sanitation Districts Clearwater Outfall Project
- Rolling Hills Prep School build out
- VOA Navy Village
- Pacific LA Marine Terminal
- Harbor Highlands Development (under construction)
- City Dock 1

B53-17

Port Master Plan update

San Pedro Community Plan update

Marymount College Expansion on PV Drive North

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

B53-17  
(Cont)

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

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

B53-18

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

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

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

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

B53-19

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

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

**PV Transit Orange Line** runs 2 morning buses along Western from Palos Verdes Drive North to First Street then to Palos Verdes Drive East ending at

Palos Verdes High School and 3 buses in the afternoon corresponding with school start and stop times. These lines are designed to carry Palos Verdes students to Palos Verdes schools, and as such are really not useful to the residents of Ponte Vista.

B53-19  
(Cont)

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

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

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

B53-20

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

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

B53-21

**The Projected Routing for PM Peak Hour Traffic Does Not Seem to Have a Basis**

We realize that predicting access routing is sometimes an art rather than a science. However, given the very long PM backups at the 110 Freeway off-ramps at Sepulveda, Pacific Coast Highway and Anaheim, coupled with the challenge of making a left turn across Western, it seems likely that in the evening, a large percentage of commuters will exit at Channel Street and proceed north on Gaffey to Channel, Capitol, or Westmont and then west to Western to the project entrances. This assumption is given further credence in that virtually every place a commuter might want to stop on their way home, be it for groceries, dry cleaning, or to pick up a child, is off of either Gaffey or that portion of Western that lies between Channel and Westmont. Further, this commuter traffic will be joined by those residents who are coming home from downtown San Pedro and the San Pedro Waterfront and from Long Beach and points south via the 47. An analysis of all of this traffic should be included.

B53-22

**OTHER CONCERNS**

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

B53-23

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

B53-24

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

B53-25

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

B53-26

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

B53-27

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

B53-28

The DEIR fails to discuss the impact of the additional traffic on the freeway off-

B53-29

ramps at Pacific Coast Highway and Anaheim and the resulting backup on the 110 freeway.

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

B53-29 (Cont)

B53-30

The DEIR does not appear to account for the impact on traffic of the additional time required for the approximately 225 additional middle and high school students pushing the "walk" button to cross Western on their way to and from school, assuming that the Dodson students walk to school and the High School students take public transportation. This must be added into the traffic study for that intersection.

B53-31

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

B53-32

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

B53-33

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

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

B53-34

**PUBLIC TRANSPORTATION**

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

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

B53-35



inconvenienced.

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

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

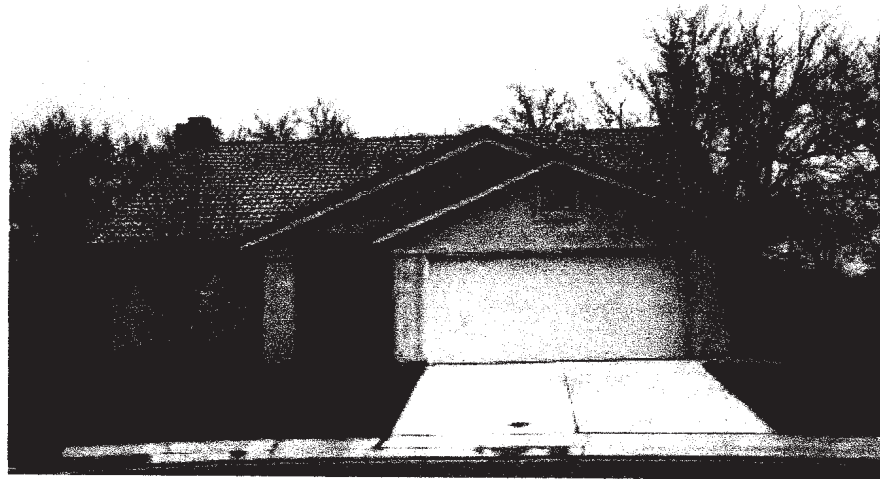
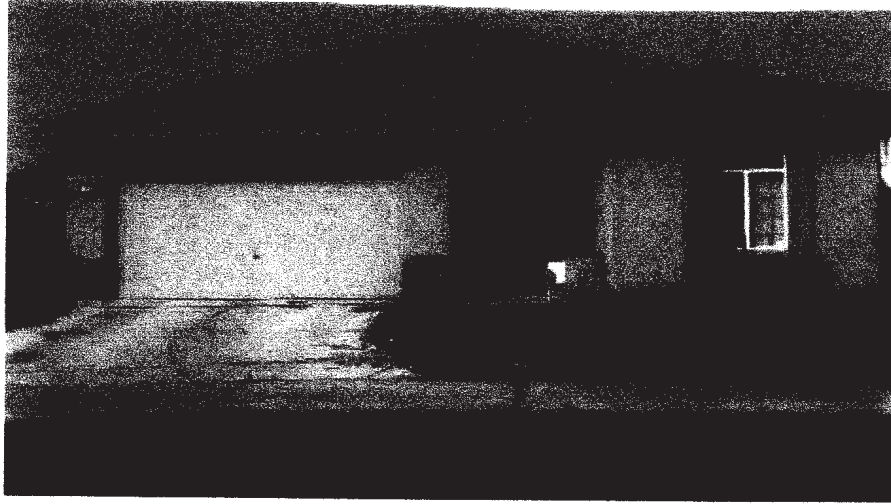
**PV Transit Orange Line** – runs 2 buses along Western from PV Drive N. to First then to PV Drive East ending at PV High School in am and 3 in pm timed with school start and stop times. These lines are designed to carry Palos Verdes students to Palos Verdes schools, and as such are really not useful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

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



B53-35  
(Cont)

**SINGLE-FAMILY RESIDENTIAL  
MODERN - POST 1990  
D-6 QUALITY**



**SINGLE-FAMILY RESIDENTIAL  
BUILDING SPECIFICATIONS  
"D" CONSTRUCTION**

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

**SINGLE-FAMILY RESIDENTIAL  
CONVENTIONAL TYPE  
SQUARE FOOT AREA COST TABLES**

**"D" CONSTRUCTION - SHAPE B**

Class	400	500	600	700	800	900	1000	1100	1200	1300	1400
D-1	51.11	47.49	44.78	42.58	40.87	39.49	38.28	37.47	36.55	35.84	35.13
D-1.5	56.17	52.16	49.15	46.72	44.86	43.43	42.15	41.03	40.06	39.42	38.61
D-2	61.64	57.22	53.98	51.36	49.28	47.65	46.22	45.18	44.05	43.21	42.35
D-3	67.71	62.92	59.33	56.30	54.14	52.34	50.74	49.58	48.40	47.48	46.57
D-3.5	74.30	69.01	65.09	61.86	59.46	57.49	55.71	54.42	53.15	52.14	51.11
D-4	81.66	75.78	71.47	67.97	65.25	63.11	61.21	59.70	58.30	57.20	56.17
D-4.5	89.61	83.16	78.45	74.64	71.64	69.32	67.19	65.57	64.00	62.74	61.64

**"D" CONSTRUCTION - SHAPE B**

Class	700	800	900	1000	1100	1200	1300	1400	1500	1600	1700
D-5	81.83	78.62	76.04	73.70	71.97	70.31	68.88	67.65	66.70	65.66	64.80
D-5.5	89.83	86.29	83.43	80.90	79.00	77.19	75.73	74.30	73.29	72.05	71.14
D-6	103.41	99.29	95.95	93.11	90.80	88.81	87.01	85.53	84.22	82.90	81.89
D-6.5	114.57	110.09	106.33	103.16	100.75	98.35	96.41	94.74	93.39	91.87	90.73
D-7	126.98	122.00	117.91	114.39	111.60	109.03	106.95	104.99	103.49	101.84	100.47
D-7.5	147.13	141.33	136.56	132.51	129.29	126.27	123.88	121.65	119.62	117.85	116.45

**"D" CONSTRUCTION - SHAPE B**

Class	1800	2000	2200	2400	2600	2800	3000	3200	3400	3600	4000
D-5	64.11	62.74	61.69	60.79	60.16	59.46	58.79	58.30	57.86	57.49	56.78
D-5.5	70.39	68.97	67.71	66.82	66.08	65.36	64.55	64.00	63.51	63.11	62.34
D-6	81.00	79.35	77.86	76.87	75.96	75.07	74.30	73.67	73.15	72.69	71.78
D-6.5	89.73	87.89	86.40	85.14	84.21	83.21	82.35	81.65	81.00	80.46	79.50
D-7	99.46	97.47	95.70	94.38	93.33	92.27	91.32	90.45	89.73	89.17	88.16
D-7.5	115.29	112.87	110.89	109.38	108.15	106.95	105.74	104.85	103.95	103.33	102.10

**"D" CONSTRUCTION - SHAPE B**

Class	1300	1400	1500	1600	1700	1800	2000	2200	2400	2600	2800
D-8	150.07	147.29	144.84	142.66	140.95	139.53	136.71	134.24	132.50	130.92	129.39
D-8.5	179.60	176.38	173.38	170.91	168.79	166.99	163.73	160.74	158.57	156.73	154.84
D-9	255.76	250.99	246.85	243.25	240.24	237.72	233.01	228.84	225.68	223.11	220.33
D-9.5	379.71	372.76	366.62	361.06	356.82	352.87	346.04	339.81	335.14	331.22	327.19
D-10	452.49	444.10	436.79	430.37	425.13	420.53	412.27	404.95	399.43	394.75	389.99

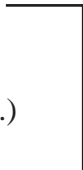
**"D" CONSTRUCTION - SHAPE B**

Class	3000	3200	3400	3600	3800	4000	4200	4400	4600	4800	5000
D-8	128.08	126.91	125.94	125.18	124.14	123.61	123.17	122.66	122.32	121.87	121.58
D-8.5	153.26	151.87	150.69	149.81	148.74	148.00	147.44	146.86	146.51	145.94	145.52
D-9	218.18	216.24	214.57	213.19	211.59	210.67	209.87	209.04	208.46	207.69	207.25
D-9.5	323.97	320.98	318.68	316.68	314.15	312.72	311.64	310.32	309.61	308.36	307.76
D-10	386.00	383.03	379.59	377.28	374.51	372.74	371.52	369.81	368.93	367.57	366.79

From: **Bruce Horton** <[sbhorton@cox.net](mailto:sbhorton@cox.net)>  
Date: Thu, Jan 3, 2013 at 10:03 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Erin

I have sent comments on issues that I think are relevant to the discussion of development at Ponte Vista. I think the R1 number of SFR's should be 291 to allow for the open space that should be part of this project. Looks like the developer can still make a profit (see attachment.) Infrastructure overload and traffic are primary concerns.



B54-1

Bruce Horton

**Summary of Principal Comments**

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.



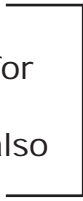
B54-2

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.



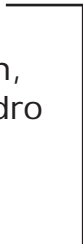
B54-3

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.



B54-4

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.



B54-5

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.



B54-6

7. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B54-7

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B54-8

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can't get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

B54-9

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B54-10

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B54-11

From: **Debbie Sue Stinson** <[debbiesue2@cox.net](mailto:debbiesue2@cox.net)>  
Date: Thu, Jan 3, 2013 at 10:03 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Erin

I have sent comments on issues that I think are relevant to the discussion of development at Ponte Vista. I think the R1 number of SFR's should be 291 to allow for the open space that should be part of this project. Looks like the developer can still make a profit (see attachment.) Infrastructure overload and traffic are primary concerns.

B55-1

Debbie Sue Stinson

### Summary of Principal Comments

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.

B55-2

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.

B55-3

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.

B55-4

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.

B55-5

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.

B55-6

7. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B55-7

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B55-8

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can t get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

B55-9

10. The fact that noxious fumes are emitted occasionally from the Defense Fuel Supply Point located next to the property is of particular concern as there is no plan to curtail them. That fact was made clear by the federal government when the property was originally sold.

B55-10

11. The community is now planned to be gated which was an option that was rejected by the Ponte Vista committee set up by former Councilwoman Janice Hahn to review the first plan of 2300 units. Gated communities are exclusionary not inclusionary and despite there being a few built in San Pedro quite a few years ago, they are not in keeping with the nature of most of San Pedro. Who are they trying to keep out anyway?

B55-11



From: **Steve Magee** <[mageeframing@gmail.com](mailto:mageeframing@gmail.com)>  
Date: Thu, Jan 3, 2013 at 10:05 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Erin

I have sent comments on issues that I think are relevant to the discussion of development at Ponte Vista. I think the R1 number of SFR's should be 291 to allow for the open space that should be part of this project. Looks like the developer can still make a profit (see attachment.) Infrastructure overload and traffic are primary concerns.

B56-1

Steve Magee

### Summary of Principal Comments

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.

B56-2

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.

B56-3

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.

B56-4

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.

B56-5

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.

B56-6

7. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B56-7

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B56-8

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B56-11

From: **Sasha Carter** <[sashacarter33@gmail.com](mailto:sashacarter33@gmail.com)>  
Date: Thu, Jan 3, 2013 at 11:39 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Erin Strelich,

*Please keep the development R1.*



B57-1

*Sincerely,*

*Sasha Carter*

From: **Janis Lindsey** <[goshnikrovski@yahoo.com](mailto:goshnikrovski@yahoo.com)>  
Date: Thu, Jan 3, 2013 at 1:48 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>  
Cc: "[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)" <[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)>

January 3, 2013

Janis A. Lindsey  
1982 Redondela Drive  
Rancho Palos Verdes, CA 90275

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Erin Strellich,

In regard to Ponte Vista ENV-2005-4516-EIR, I respectfully recommend and request that Alternate B: "No Project Alternative/Single Family Homes" be enforced. Please, please, **please**, please keep the development R1, as it is currently zoned.

B58-1

Very truly yours,

Janis A Lindsey

cc: Joe Buscaino, Councilman  
bcc: Rolling Hills Riviera Homeowners Association

From: **Stuart Eckmier** <[faystu@cox.net](mailto:faystu@cox.net)>

Date: Thu, Jan 3, 2013 at 1:51 PM

Subject: Ponte Vista ENV-2005-4516-EIR Please keep the Ponte Vista Development R1 Thank you.

To: [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org), [councilmemberbuscaino@lacity.org](mailto:councilmemberbuscaino@lacity.org), [us.board@nwsanpedro.org](mailto:us.board@nwsanpedro.org)

B59-1

From: **Curtis Carter** <[fanofhockey99@sbcglobal.net](mailto:fanofhockey99@sbcglobal.net)>  
Date: Thu, Jan 3, 2013 at 2:46 PM  
Subject: Ponte Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep the development of Ponte Vista to R1 - alternate A only.



B60-1

Sincerely,

Curtis & Frances Carter  
1901 El Rey Road  
San Pedro, CA

From: **Henderson** <[john.gina@att.net](mailto:john.gina@att.net)>

Date: Thu, Jan 3, 2013 at 4:50 PM

Subject: Ponte Vista Development

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hello Erin,

Please keep the Ponte Vista development at R1 as it is. This makes sense for so many more reasons than it does to change the zoning which will have a direct effect on quality of life, our local environment and housing values.

I speak for many people that we know, some of which already shun this area during parts of the day because it is overly congested.

Thank you,

John Henderson  
Rolling Hills Riviera Resident

B61-1

From: **Brad Lancaster** <[brad@goldmanlancaster.com](mailto:brad@goldmanlancaster.com)>  
Date: Thu, Jan 3, 2013 at 4:55 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Ms Strelich,

I am a homeowner in the Ponte Vista area. The proposed Ponte Vista Development with 1135 units would put an unbearable infrastructure and traffic burden on our neighborhood. R1 should remain R1! I am vehemently against any plan that adds multi-family housing to an already crowded environment.

B62-1

Sincerely,

Brad Lancaster

2174 W Rockinghorse Road

RPV, CA 90275

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From: **Masaki Mizuhashi** <[mizuhashi@jmactrading.com](mailto:mizuhashi@jmactrading.com)>  
Date: Thu, Jan 3, 2013 at 5:02 PM  
Subject: RE: Ponte vista project  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Sorry, I have made the mistake, my comment is below.

Alternate **B**: "No Project Alternative/Single Family Homes



B63-1

Thanks,

---

**From:** Masaki Mizuhashi [mailto:[mizuhashi@jmactrading.com](mailto:mizuhashi@jmactrading.com)]  
**Sent:** Thursday, January 03, 2013 4:59 PM  
**To:** '[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)'  
**Subject:** Ponte vista project

Erin Strelich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

*I am a neighbor of Pote Vista and please keep the development R1.*



B63-2

Thank you and regards,

Masaki Mizuhashi

From: **Bill Spinelli** <[wspinelli@sbcglobal.net](mailto:wspinelli@sbcglobal.net)>  
Date: Thu, Jan 3, 2013 at 5:23 PM  
Subject: Pointe Vista Project - San Pedro CA  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I have been a homeowner at 1916 Galerita Drive, Rancho Palos Verdes, CA for the past 39 years. We are located across the street from the proposed Pointe Vista Project scheduled on the old Navy property off of Western Avenue. For reasons of traffic and population density I am requesting the property stay zoned **R1** as it is currently zoned.

B64-1

Thank you,

Bill Spinelli

From: <[Dileva4@aol.com](mailto:Dileva4@aol.com)>

Date: Thu, Jan 3, 2013 at 8:46 PM

Subject: pontevista env-2005-45516-eir

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Please keep Ponte Vista as R-1 zone.  
We do not need rental units.  
Please keep the land as single family dwellings.  
Thank you



B65-1

From: **Donna Brandelli** <[fyreatr@cox.net](mailto:fyreatr@cox.net)>  
Date: Thu, Jan 3, 2013 at 9:09 PM  
Subject: Ponte Vista housing project  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Hi,

I am sending this email to voice my opinions regarding the newest version of the proposed Ponte Vista housing.

We were given inadequate time to review the EIP, which was released just prior to the holidays and the review period was during most of the holiday period. Due to the size and complexity of the document, the review period should be extended to give a fair review period.

B66-1

Regardless of the time constraint, I still need to voice my concerns. As one living across the street from the proposed project and having dealt with the increased traffic on Western Ave for over a decade due to condo/apartment development, business, and bussing in to the neighborhood to the schools, I can only see additional traffic congestion. Not only will it add to the usually high traffic flow on Western, it will directly impact the adjoining neighborhoods making it even harder to get in and out of our neighborhood.

B66-2

Additionally, the proposed high density project is not congruent with the adjoining neighborhoods consisting primarily of single family homes. I knew when the property was purchased years ago for a large amount, that the ONLY way the developer to recoup was to try and force high density housing into the area, and that has been the primary plan over and over, much to the displeasure of the neighborhoods in both cities.

Not only will a high density housing project cause additional congestion to the surrounding neighborhoods, it will also impact schooling, water supply, and the existing infrastructure---much of which is aging and in need of repair. Additionally, the public safety services will be impacted with such a high density project. No matter how you work a high density project, there will be increased demands on all of the aforementioned.

B66-3

Currently there is at least some open space in the area. San Pedro and LA and all of southern CA for that matter is woefully lacking in open space. That should be preserved as well.

B66-4

I am firmly AGAINST any high density housing which would impact infrastructure and deplete a larger share of open space. If a housing project must be approved, I support ONLY single family dwellings with a good mixture of open space.

Thank you,

Donna Brandelli

From: **Holly Pearson** <[boneshakersboat@hotmail.com](mailto:boneshakersboat@hotmail.com)>  
Date: Thu, Jan 3, 2013 at 9:26 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Dear Erin,

Please keep Ponte Vista R-1 zone. There are already a number of apartments that are not fully rented on Western. Its hard for us to get our of our neighborhoods. There are not enough single family homes with backyards for kids to run around in the area. Please keep the homes R-1 = Alternate B Single Family homes.

B67-1

Sincerely,

Holly Pearson

From: <[Eliana@AOL.com](mailto:Eliana@AOL.com)>  
Date: Thu, Jan 3, 2013 at 9:28 PM  
Subject: Fwd: SUBMIT YOUR PONTE VISTA COMMENTS  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)  
Cc: [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Dear all,

San Pedro is over populated... Western Avenue is a nightmare and I don't even need to use it often and I will not be impacted by Ponte Vista... but for the sake of the people... please keep Ponte Vista with the same number of houses it had when it was operational.. Please make them luxurious and improve the area... We already have enough apartments down in Harbor City. This should not be a community of apartments except for a few units for 55 years and older that don't drive much and don't have to be out during commuting times. We need to improve our community, not lower its standards for a person or company to increase its banking funds at the expense of the citizens that live and have to drive through Western Avenue.

B68-1

Thank you for asking,

Sincerely,  
Eliana Campbell

---

From: [ksmith@klct.com](mailto:ksmith@klct.com)  
To: [elianar@aol.com](mailto:elianar@aol.com)  
Sent: 1/2/2013 3:20:33 P.M. Pacific Standard Time  
Subj: SUBMIT YOUR PONTE VISTA COMMENTS

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Northwest San Pedro Neighborhood Council

**REMINDER: NWSPNC SPECIAL BOARD AND COMMUNITY MEETING IS TOMORROW NIGHT, Thursday, January 3.**

The NWSPNC is holding a special meeting to consider comments on the Ponte Vista Draft EIR on Thursday, January 3 at 6:00 pm at Peck Park.

See [www.nwsanpedro.org](http://www.nwsanpedro.org) for agenda and to view the draft comments that will be discussed at the meeting.

## **PONTE VISTA DEIR - EMAIL YOUR COMMENTS TO THE CITY. DEADLINE IS MONDAY, JANUARY 7TH.**

The deadline for submitting your comments to the city is 4pm, January 7, 2013 (Monday). To ensure your comments reach the city by the deadline, we encourage you to send them by email to Erin Strelch, Planning Assistant at the following email address: [erin.strelch@lacity.org](mailto:erin.strelch@lacity.org). The DEIR is available online at <http://cityplanning.lacity.org> (click on "Environmental" then "Draft EIR" then Ponte Vista) or at the San Pedro Library. It is a huge document so we suggest you look at the index and read the sections of specific interest to you.

It is important to put the following into the subject line of your comments:  
**Ponte Vista ENV-2005-4516-EIR**

Comments should should be addressed to:

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Fax: (213) 978-1343  
Email: [erin.strelch@lacity.org](mailto:erin.strelch@lacity.org)

We recommend that you also send a copy to Councilman Joe Buscaino, 638 S. Beacon, San Pedro 90731 or by e-mail to [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org) and to us [board@nwsanpedro.org](mailto:board@nwsanpedro.org).

VISIT OUR WBSITE AT: [www.nwsanpedro.org](http://www.nwsanpedro.org)



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Northwest San Pedro Neighborhood Council | 638 S. Beacon Street, Box #688 | San Pedro | CA | 90731

From: **Nkbrigden** <[nkbrigden@sbcglobal.net](mailto:nkbrigden@sbcglobal.net)>  
Date: Thu, Jan 3, 2013 at 10:09 PM  
Subject: Ponte Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I think it should be a park.



B69-1

From: <[conniegregory@cox.net](mailto:conniegregory@cox.net)>  
Date: Fri, Jan 4, 2013 at 5:39 AM  
Subject: Ponte Vista development San Pedro  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Please keep this proposed development to R-1.  
Connie Gregory  
Sent from my iPhone



B70-1

From: **Jonathan Fly** <[jfly@flylawoffice.com](mailto:jfly@flylawoffice.com)>  
Date: Fri, Jan 4, 2013 at 8:51 AM  
Subject: Reference ENV-2005-4516  
To: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Dear Councilman Buscaino and Ms. Strelich:

I am a resident of San Pedro and I am gravely concerned about the lack of planning and flawed environmental impact report for the Ponte Vista Project. I believe this project will have a negative impact on our schools, existing city services, traffic, and access to local amenities, and I am asking the city to more carefully study this project before making any zoning changes at Ponte Vista. Further, I support and adopt the Northwest San Pedro Neighborhood Council's findings and opposition to the Draft Environmental Impact Report.

B71-1

Sincerely,

Jonathan P. Fly

Attorney at Law

395 W. 6th St.

Suite 222

San Pedro, CA 90731

tel [\(310\) 929-7871](tel:(310)929-7871)

fax [\(310\) 439-9182](tel:(310)439-9182)

<http://www.flylawoffice.com>

[jfly@flylawoffice.com](mailto:jfly@flylawoffice.com)

#### PRIVILEGE AND CONFIDENTIALITY NOTICE

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From: **Kim Kohler** <[kkohler@chadwickschool.org](mailto:kkohler@chadwickschool.org)>

Date: Fri, Jan 4, 2013 at 8:58 AM

Subject: Ponte Vista

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hopefully, once and for all, you will go forth with a moderate plan, somewhere between the extremes that have kept that site such an eyesore! The open space aspects, possibly to be shared by the public, are very appealing.

Thank you,

Kim Kohler

San Pedro Resident

--

*Kimberly Kohler*

*Upper Village Art Specialist - Grades 3, 4, 5 & 6 - Studio 825*

*Director - Sunset Activities (After School Program)*

*Director - Arts Unlimited (Summer)*

**CHADWICK SCHOOL**

*26800 South Academy Drive*

*Palos Verdes Peninsula CA 90274*

*310.541.6763 X 4099*

[kkohler@chadwickschool.org](mailto:kkohler@chadwickschool.org)

B72-1

From: **Laura Arzoumanian** <[arzoumanian@sbcglobal.net](mailto:arzoumanian@sbcglobal.net)>  
Date: Fri, Jan 4, 2013 at 3:56 PM  
Subject: Pointa Vista Project.  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

To Whom It May Concern.

I am a home owner and resident in the Eastview area directly across the street from the Pointe Vista project site. I want to take this opportunity to strongly oppose any change to the zoning for this site. It should stay zoned as R1. It is over crowded in this area as it is.

B73-1

Sincerely,

Douglas and Laura Arzoumanian

From: **Richard Wagoner** <[rwagoner@me.com](mailto:rwagoner@me.com)>  
Date: Fri, Jan 4, 2013 at 3:58 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [buscaino@lacity.org](mailto:buscaino@lacity.org)

Erin Strelich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

I am writing this letter in reference to the Draft EIR for the Ponte Vista property in San Pedro.

I support Alternative B, the alternative that keeps Ponte Vista zoned R1 as it has been zoned for decades. It is my opinion that the ONLY option for the Ponte Vista property is to remain R1, for a variety of reasons:



B74-1

1. The traffic problems caused by a development larger than R1 will make an already bad situation worse. With all of the building on Gaffey Street, Gaffey will no longer be an alternative to Western Avenue, as it will itself be gridlocked. Having Western gridlocked as well -- it already is at various times of the day -- will cause problems with public safety insofar as emergency vehicles being stuck as well as making it very dangerous for children who live or attend school in the area. Western Avenue will become far too dangerous for children and the elderly.



B74-2

2. The impact on local schools cannot be underestimated. All local schools are already over capacity, including all public elementary, middle and high schools. Both Narbonne and San Pedro High have attempted to mitigate their overcapacity with limited success; combined with all of the other already-approved building to a zoning that would allow more than R1 on capacity will be devastating to all local schools and may cause problems far into the future.



B74-3

3. There is no demand for, nor is there a shortage of apartments, condos or other multi-family housing units in the San Pedro or surrounding areas. In fact, there is a vast surplus of unsold properties fitting the description of the proposed development at Ponte Vista. And there will be more once the currently-approved units in the directly surrounding area go on the market. There is such a glut of multi-family units and apartments already that many are sitting unsold all over town.



B74-4

4. There is a shortage and high demand for single-family housing as described by R-1 zoning. Homes in R-1 zoned areas are in high demand even in depressed real estate markets. R1 is exactly what people in our community aspire to own, and it would be a travesty to take away the last possible chance for young couples and families to get in on the American Dream by changing the zoning in the Ponte Vista area.



B74-5

5. The proposed development includes units as small as 600 square feet, and numerous rental properties. This goes against the community master plan which itself exists because of a backlash over overdevelopment in San Pedro years ago. San Pedro does not want dense housing developments, and Ponte Vista as proposed will not only become unsaleable, it will most likely become nothing more than a public nuisance as unsold units and unrented apartments become a hangout for criminals as has happened in other areas with developments far less dense than what is proposed at Ponte Vista.

Ponte Vista must stay R1. The community wants it that way, buyers want it that way, and it will be better for San Pedro, the Harbor Area and Southern California as a whole to keep it that way. I am a lifelong resident of San Pedro (I still consider my home to be part of the San Pedro community), and we need Ponte Vista to remain R1.

Sincerely,

Richard Wagoner  
2026 Delasonde Drive  
Rancho Palos Verdes, CA 90275  
[310-521-1946](tel:3105211946)

B74-6



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

From: **Edward Mendoza** <[eddie4loans@att.net](mailto:eddie4loans@att.net)>

Date: Fri, Jan 4, 2013 at 4:48 PM

Subject: PONTEVISTA PROJECT

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hello Erin, my wife and I have been residents in the Eastview tract for 28 years. As we've watched the community grow, there is no way it can support over 1100 new homes/condos or the like. Our traffic is barely tolerable as it is now. We are in favor of keeping the project area zoned R-1, and support the Alternate Plan B.

Thank you,

*Eddie Mendoza, Sr.*

*Christine Mendoza*

B75-1

From: **Yvonne Bogdanovich** <[vonniebogs@gmail.com](mailto:vonniebogs@gmail.com)>

Date: Fri, Jan 4, 2013 at 5:35 PM

Subject: "Ponte Vista ENV 2--5-4516 EIR"

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strellich,

I'm writing in support of the Ponte Vista Project and have been since the start under Bisno Development. I'm happy to see that this project is finally moving forward be it for the 830 unit plan or the 1135 unit plan. This project has been through several ownership's as well as design changes. The present design is a suited look for San Pedro, with open spaces for the residence to enjoy and the much needed road to Mary Star of the Sea High School. I was on the steering committee for the High School and am still involved with the High School and know the importance of having that permanent road as first agreed upon many years ago. I hope this project moves forward quickly, clearing the land of the old Navy housing will be the first step of improvement.

I have lived in San Pedro all my live, 75 years this coming April, I look forward to seeing this project develop.

Sincerely,

Yvonne Bogdanovich

B76-1

From: <JGaines852@aol.com>

Date: Fri, Jan 4, 2013 at 6:01 PM

Subject: ENV 2005-4516 EIR (PROPOSED DEVELOPMENT OF PONTE VISTA SITE)

To: [Erin.strellich@lacity.org](mailto:Erin.strellich@lacity.org)

Cc: [alison.becker@lacity.org](mailto:alison.becker@lacity.org), [diananave@earthlink.net](mailto:diananave@earthlink.net), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Dear Ms. Strellich:

I wish to offer comments to **Section N. Traffic of the DEIR ENV 2005-4516.**

I served as chairman of the Western Ave. Task Force (2005) as well as served on Councilwoman Janice Hahn's Ponte Vista Community Advisory Committee. My comments are based on my experience with these two community task forces.

First, the Western Ave. Task Force was a joint effort by the cities of Rancho Palos Verdes and Los Angeles, working with Cal Trans which has jurisdiction over a large portion of Western Ave. in the North San Pedro, South Harbor City region. **The findings and actions of this task force led to investment by Cal Trans in installing computer coordinated signal controls along Western Ave. from Summerland on the South north to Pacific Coast Highway and further north.** This was a significant investment for Cal Trans within a tight state budget. The findings of the engineers indicated that this was **an urgent action** because of their traffic studies which showed a volume on the four lane highway around Avenue Aprenda to be an average of **36,500 vehicles per 24 hours**. Estimates now are under the 1% per year growth rate to be around **40,000 vehicles** in the area per 24 hours.

B77-1

Other mitigation options were identified by the task force that included constructing de-acceleration lanes near commercial centers to enable traffic to maintain steady movement. It was agreed that adding a third lane in each direction was not feasible because of high costs to relocate utilities and related infrastructure such as storm drains. **What was unique about this task force was that professional engineers from all three agencies agreed on the traffic impacts existing on Western Ave. in 2006 (prior to any studies made for future projects).**

B77-2

In working with the Ponte Vista Citizens advisory committee, I reviewed the ITE tables as well as others used in cities such as San Diego. Clearly such tables are at best estimates that may or may not reflect local project characteristics. Such tables focus on the defined housing project designs,(single family vs. multiple family products).

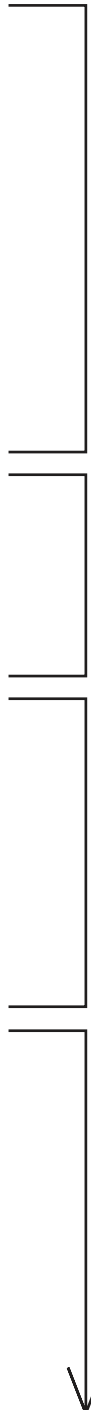
I have to agree with the Northwest San Pedro Neighborhood Council comments where **they question the validity of ITE Traffic Generation Data.** My concern is that the DEIR uses a **mid point** for their analysis for the proposed seven different housing products that may or may not be constructed from a five to fifteen year period. There is uncertainty here on just what traffic impacts may occur with such an unknown mix of housing products.

B77-3

In addition I have argued that the **topography of the region is not well reflected in the ITE tables.** These tables are used as a guide in urban areas where there are various traffic circulation options from all directions to the project site. **The Ponte Vista site is accessible only from Western Avenue.** Western Avenue is only one of two major north south routes to San Pedro. This forces traffic from the project site to enter and leave only from this highway with its current congestion issues.

Therefore, my concerns are with (1) the project ITE formula being used as a mid point average with uncertainty of the actual project housing mix, and (2) no recognition of the limited circulation available within the local region because of the local topography. In effect some of the suggested mitigation measures may not be adequate to address traffic circulation in this region.


B77-4



Thank you for including my comments in the DEIR input process.

Sincerely,

Jerry Gaines  
2101 West 37th St.  
San Pedro, CA 90732-4707  
[jgaines852@aol.com](mailto:jgaines852@aol.com)



B77-4  
(Cont)



B U S I N E S S   ▲   C O M M U N I T Y   ▲   G O V E R N M E N T

January 4, 2013

To: Erin Strellich, Planning Assistant, Los Angeles Department of City Planning

Subject: Ponte Vista ENV-2005-4516 EIR

The Harbor City/Harbor Gateway Chamber of Commerce Board of Directors unanimously voted to support, the Ponte Vista project of 1153 units or the 830 units. The project is located within the Harbor City-Wilmington Community plan and we are looking forward to the development of the project which will help in the economical recover for our communities.

The economy is still in the early stages of recovery and the market just does not exist for that amount of single family homes. 1135 units plan at Ponte Vista would have a variety of housing types for many different household-from families to single seniors. So many more people with different kinds of life style and incomes levels could find homes at Ponte Vista.

The single-family only option doesn't really include any decent open space. But both the 830 plan and the 1135 plan have significant open space and hiking trails, as well as playgrounds and a community center.

The 830 units pan even includes 208 single-family homes. I really support this plan for Ponte Vista.

B78-1

Respectfully

Joann Valle, Executive Director

From: **Mark R Wells** <[mtwells@pacbell.net](mailto:mtwells@pacbell.net)>  
Date: Fri, Jan 4, 2013 at 8:31 PM  
Subject: Re:NO. ENV-2005-4516-EIR  
To: Erin Strelch <[erin.strelch@lacity.org](mailto:erin.strelch@lacity.org)>

Greetings, Erin Strelch.

Here are my comments to The Ponte Vista Project's DEIR:

---

"Mark R. Wells

1858 Trudie Drive

Rancho Palos Verdes, CA 90275

January 4, 2013

Erin Strelch, Planning Assistant

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

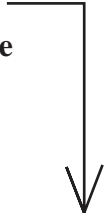
Los Angeles, CA 90012

Re: **NO. ENV-2005-4516-EIR**

Dear Erin Strelch:

The following are my comments to the Draft Environmental Impact Report (DEIR) for **The Ponte Vista Project**.

B79-1



I have known about development plans for the area in which The Ponte Vista Project is planned for since 2005.

I began my [www.pontevista.blogspot.com](http://www.pontevista.blogspot.com) blog in about September 2006 and I served as one of the three representatives appointed from the city of Rancho Palos Verdes, to (former) Los Angeles City Councilwoman Janice Hahn's Community Advisory Committee for the Ponte Vista at San Pedro project.

I also serve as a committee member of "R Neighborhoods Are 1", a community-based organized group that provides education and other amenities that allow residents of many communities the opportunities to learn about The Ponte Vista Project. This helps to organize individual and groups towards seeking the best results for all communities, with respect to the development of The Ponte Vista Project.

Between April 2009 and continuing to the present, I have considered many possible options for the development of the site and, I have changed my opinion about what could be successfully built there.

I have gone from a staunch supporter of keeping the current zoning on the site and not allowing for any new zoning there, to someone who believes that the zoning should not be changed, but now I have the opinion that "Alternative C", which allows for the construction of up to 830 dwelling units at The Ponte Vista Project would be acceptable.

I have written that I believe that the dwelling density per acre on buildable land within the Ponte Vista site should be no greater than what has been constructed at "The Gardens", a nearby multi-family, multiple dwellings development.

I still have two concerns dealing with my acceptance of "Alternative C" that I strongly feel needs further studies and may require an alternative to "Alternative C".

"SB 1818" is one way to identify what others may think of for the codes and requirements of implementing a 'density bonus' in a development. I feel it would be absolutely terrible to approve any Alternative that would eventually allow for the construction of more than 850-

B79-1  
(Cont)

B79-2

dwelling units on the Ponte Vista site.

B79-2  
(Cont)

No matter how many dwellings might be approved for at the Ponte Vista site, I must continue to call for at least 15 acres of open space within the boundaries of The Ponte Vista Project. I do not find that “Alternative C” allows for enough open space that is usable for recreation and other activities by residents and members of the public.

B79-3

Since my original comments to the DEIR created for the former development known as “Ponte Vista at San Pedro”, I continue to have great support for “Alternative B”, which calls for elimination of all structures on the site and/or the construction of up to ‘385’ dwelling units, all on individual lots of not less than 5,000 square feet in size.

However, with the need for more open space on the site, I believe that should this Alternative be approved, it should allow for no more than 291-single family dwelling units.

I have some knowledge of the comments that have been created by the Northwest San Pedro Neighborhood Council and what the “Board of R Neighborhoods Are One” have considered and I hope both of those sets of comments are studied by all, with specific further studies being based on Traffic and Transportation comments, created by the Northwest group.

B79-4

I am confident that comments created by Mr. Kit Fox and/or others representing the city of Rancho Palos Verdes will offer sound reflection and recommendations for further study by Staff and members of The Los Angeles City Planning Department and Commission.

With any of the Alternatives that would allow for new construction on the site, I oppose the approval of any ‘Specific Plan’ for the site and would recommend that specific lots be established for new construction, depending on the dwelling or other units approved for at The Ponte Vista Project.

Thank you.



Sincerely,

Mark R. Wells"

-----30-30-----  
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P.S. Hard copy via U.S.P.S. to follow.

From: **Michael Mattingly** <[mattingl.m@sbcglobal.net](mailto:mattingl.m@sbcglobal.net)>

Date: Fri, Jan 4, 2013 at 11:55 PM

Subject: recommend alternate b , or no new homes traffic is at peak now

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)



B80-1

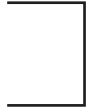
From: **robert kinsey** <[rmkinsey@cox.net](mailto:rmkinsey@cox.net)>

Date: Sat, Jan 5, 2013 at 10:41 AM

Subject: RHRHA

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Re the Ponte Vista development.....please keep the development R1, as it is currently zoned, thank you



B81-1

From: **Sheri Kaufman** <[sheri@allenkaufman.com](mailto:sheri@allenkaufman.com)>  
Date: Sat, Jan 5, 2013 at 10:41 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Ms. Erin Strelich,

We are long time residents of Harbor Pines and are writing this letter to you in response to the above named project that I believe will exceedingly and adversely affect our community. And having heard of the latest deadline for January 7, is unreasonable and required comments over the holiday season which did not allow for sufficient time to review and comment.

B82-1

We support R1 zoning and oppose this project as proposed in Alternatives A and C. Please note our further objections for this project for the following reasons:

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.

B82-2

2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.

B82-3

4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.

B82-4

4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.

B82-5

6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.

B82-6

7. The DEIR should analyze at least one additional alternative that

B82-7



better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.

B82-7  
(Cont)

8. There is also a concern for the increased demands on infrastructure that a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

B82-8

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can t get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

B82-9

10. The fact that noxious fumes are emitted occasionally from the Defense Fuel Supply Point located next to the property is of particular concern as there is no plan to curtail them. That fact was made clear by the federal government when the property was originally sold.

B82-10

11. The community is now planned to be gated which was an option that was rejected by the Ponte Vista committee set up by former Councilwoman Janice Hahn to review the first plan of 2300 units. Gated communities are exclusionary not inclusionary and despite there being a few built in San Pedro quite a few years ago, they are not in keeping with the nature of most of San Pedro. Who are they trying to keep out anyway?

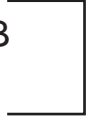
B82-11

Sincerely,

Allen and Sheri Kaufman

From: **Norma Bauer** <[birds77035@sbcglobal.net](mailto:birds77035@sbcglobal.net)>  
Date: Sat, Jan 5, 2013 at 12:00 PM  
Subject:  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

In regards to Ponte Viste ENV-2005 4515-EIR I am recommending B  
on the ballot.



B83-1

From: [det310@juno.com](mailto:det310@juno.com) <[det310@juno.com](mailto:det310@juno.com)>

Date: Sun, Jan 6, 2013 at 7:03 PM

Subject: San Pedro and Peninsula Homeowner's Coalition - DEIR - Ponte Vista

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

*San Pedro and Peninsula Homeowner's Coalition  
Post Office Box 1106, San Pedro, CA 90733*

January 5, 2013

Ms. Erin Strelich, Planning Assistant  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strelich:

Re: DEIR No. ENV-2005-4516-EIR – State Clearing House #2010101082

San Pedro Peninsula Homeowners Coalition is an unincorporated homeowners group represent ten (10) separate homeowner associations, including one in Rancho Palos Verdes that is located directly across Western Avenue from the proposed Ponte Vista development.

San Pedro Peninsula Homeowners United, Inc., is a Coalition member and we, the Coalition, join in their following DEIR Ponte Vista comments regarding R-1 and Hazardous Materials.

Ponte Vista DEIR R-1 Comments

On behalf of the San Pedro Peninsula Homeowners United, Inc., I wish to submit comments regarding the Ponte Vista Development project DEIR. San Pedro Peninsula Homeowners United, Inc, remains overwhelming in favor of supporting a R-1 alternative project for the Ponte Vista site that is consistent with 5,000 square foot lots. We represent more than 1350 R-1 property owners as well as residents in The Gardens. Our membership lives within the area bordered by Palos Verdes Drive North, Gaffey Street, Channel Street and Western Avenue.

Although the Proposed Ponte Vista project is currently located within the Wilmington-Harbor Community Plan, it is the San Pedro and Rancho Palos Verdes residents that will be the most impacted by the project. Hundreds of acres of open space and refineries separate the Ponte Vista site from the Harbor City-Wilmington Communities. Traffic issues will be their major concern while San Pedro and RPV will have to deal with all of the consequences. Every day, they will live, breathe and experience the impacts of overdevelopment and poor planning.

It is unfortunate that the Planning Department seems determined to try to meet the goals, objectives and policies of the City's General Plan by considering a project that will overwhelm the areas infrastructure and public services, making the Harbor Area a less desirable place to live. R-1 zoning and singular family residences are the soul of our family-oriented San Pedro community. The roots of its citizens run deep, with a proud heritage and spirit to improve their community. Families are born, live and die here. That is why it is important for the City to hear their voice regarding what the Ponte Vista development should become. We are an active

B84-1



family-oriented community used to having family gatherings in our backyards. None of the current plans for Ponte Vista are conducive to a San Pedro lifestyle. Our children are forced from this town and required to move away from their families to find R-1 living.

Currently about 60% of San Pedro is multi-family housing. This is inconsistent with Land-Use Policy 1-1.5 which states 67% of land use should be maintained for single family. The DEIR (IV.M-24) Cumulative residential projects in the City indicates 2,195 new residential units of which only 84 (3.8%) are single family. Approval of this project would exacerbate that imbalance as none would be zoned R-1. 'One size does not fit all' when it comes to community planning. The Ponte Vista community should fit into and improve the existing community and enhance it. The proposed plans for Ponte Vista do exactly the opposite.

The justification for multi-family housing types is erroneous. The surrounding area is not all multi-story, multi-family housing. There is a glut of such housing on the market in San Pedro, some of it immediately south of the project. While some of the condo projects built in the last five years are occupied, they are rental units because the developers cannot sell them. Single-family housing is the housing type in greatest demand. The potential positive impacts generated by a new R-1 development at Ponte Vista will greatly enhance the opportunity for the successful renaissance of the downtown area by attracting people to the area that are willing and able to invest there. The project proposed by the developer will severely undercut the San Pedro community plan which emphasizes the rebuilding of downtown San Pedro. It is obvious that I-Star has dug itself into a financially difficult situation and understandably is trying desperately to make the most of it. But they bought in knowing the property is zoned R-1. They also knew it would be tempting for the Planning Department to try to solve L.A.'s housing issues on this rare 61 acre opportunity. I-Star's problem should not play a factor in what is approved for Ponte Vista. Neither can Los Angeles housing issues be solved by approving a project that will result in detracting from the existing community and surrounding neighborhoods.

The closest R-1 neighborhood to the Ponte Vista site in the City of L.A. is the Rolling Hills Highlands tract which was built in the early 60's. It is separated from the Ponte Vista site by the Mary Star High School Campus and several multi-family projects including the 1,078unit Gardens townhomes, the 62 unit Tennis Court apartments, the 130 unit Casa Verde condos and the 136 unit Seaport Homes Apartments, which originally intended to be sold as Condos. A modern R-1 development is what this community wants and needs to keep current families together and to attract new families that will support the revitalization of downtown including the Port related improvements to San Pedro. R-1 would also have the least impact to our environment and the City's already overburdened infrastructure and public services.

Project Alternative:

The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. We suggest a project alternative that includes ingress and egress to Mary Star from Western Avenue, true R-1 single-family homes and a 6 acre park.

*As the Lead Agency, the City could also consider a no-project alternative and develop it for recreation or consider an alternative R-1 project with park space. The R-1 alternative was not adequately analyzed in the DEIR. This is important because any one of the Projects significant unavoidable impacts would require disapproval of the applicants' project unless there are no*

B84-1  
(Cont)

B84-2

B84-3



*feasible mitigation measures or alternatives, and specific benefits outweigh the significant impact (Pub. Resources Code 21081). The California Environmental Quality Act requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects (Pub. Resources Code 21002: Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41). The adoption of a less damaging feasible alternative is the equivalent of the adoption of feasible mitigation (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal. 3d 376, 403). We note that such a mitigation must be adopted by the Lead Agency unless the Lead Agency can demonstrate that the mitigation is truly infeasible (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal. 4<sup>th</sup> 341, 368).*

B84-3  
(Cont)

Ponte Vista DEIR Hazardous Materials Comments

On behalf of the San Pedro Peninsula Homeowners United, Inc., I wish to submit comments regarding the Ponte Vista Development Project DEIR. San Pedro Peninsula Homeowners United has been aware of the extreme hazard that the Rancho LPG facility, in particular, represents to our community. More population to this area will only add to the potential for a very catastrophic event because of the extreme volatility of LPG. The impact of the LPG facilities should be considered very significant. The Draft EIR conclusions are based on misleading facts. In June of 1999, the Tosco Refinery Co., now referred to in the DEIR as ConocoPhillips, published their Butane Risk Management Plan formulated on the EPA regulations then in place. Those regulations required that a worst-case release assume that everything in their refrigerated 5,092,000 gallon tank is released instantaneously, that safety measures were not considered and that the butane completely vaporizes and explodes. Their calculations estimated a potential endpoint impact of 2.3 miles, which is well beyond the distance of the Ponte Vista site.

B84-4

The Cornerstone Technologies Risk Analysis of Rancho dated September 2010, presents a similar scenario for only one tank, or 63,000,000 pounds of butane that would have an impact of 3.2 miles. Again, well past the distance of the Ponte Vista site. The DEIR considers the Cornerstone report as 'unrepresentative' and therefore concludes that there is no impact to the project. How can Rancho only claim a one-half mile worst case endpoint and the Ponte Vista DEIR justify considering the impact of these facilities less than significant? Because the EPA regulatory guidelines for reporting how a worst case release was to be calculated were changed stemming from a lawsuit against the EPA by the American Petroleum Institute. The new regulations allowed safety and passive mitigation measures, such as impound basins to enter the equation and only the amount of butane that would evaporate in 10 minutes had to be calculated into the worst case release scenario. Further, that any release model could be used. Thus, the 10 minute leak from a limited size break used by Rancho rather than a total release. These new EPA regulations were released in 1999 after Tosco Refinery had already published their public relations RMP Butane worst case document.

B84-5

Why does it take a lawsuit or catastrophic event to get the attention of those we elect and have the power to regulate to become more proactive?

In 1972, when the 'Petrolane' LPG facility, now Rancho, was built, it was done without permit and little regulatory oversight. Little was known about the hazardous nature of LPG.

The City acknowledges they allowed this LPG facility to be built without permits.

The City acknowledges that LPG is too hazardous to be shipped through the Port.

B84-6

The City is aware than Rancho LPG is adjacent to the Palos Verdes Fault and in a rupture zone. The City is aware that when the tanks were constructed they were not built to withstand the current 7.3 magnitude earthquake, now predicted for the Palos Verdes Fault and that it is considered to be an active fault.

The City is aware of the potential hazard the Rancho LPG represents to the existing community, yet it is considering permitting thousands more potential victims to be exposed to this hazard at Ponte Vista.

The City is aware that the Rancho LPG facility would not be permitted close to a residential neighborhood today.

The City is aware that no matter the degree of probability for disaster, by accident, intentional or natural causes, such an event is possible and the probability factor becomes more likely as time passes and cannot be eliminated as long as the Rancho facility exists.

The City is aware by permitting the Ponte Vista Project, they are a willing partner to the consequences of their decision.

Therefore, it is reasonably prudent for the City to pass a decent Risk Management Ordinance, similar to the law enacted by Contra Costa Co. The hazards that Rancho represents to Ponte Vista and our communities are very real and as a mitigation measure the City should require Rancho to provide an adequate amount of insurance protection for the City and its residents encompassed within the endpoint of an actual worst possible release scenario stemming from an incident at these facilities.

As the Lead Agency, the City should also consider a no-project alternative or at least take steps to minimize the number of potential victims by considering an alternative R-1 project with park space.

The R-1 alternative and the hazards from these facilities were not adequately analyzed in the DEIR.

*This is important because any one of the Projects significant unavoidable impacts would require disapproval of the applicants' project unless there are no feasible mitigation measures or alternatives, and specific benefits outweigh the significant impact (Pub. Resources Code 21081). The California Environmental Quality Act requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects (Pub. Resources Code 21002: Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41). The adoption of a less damaging feasible alternative is the equivalent of the adoption of feasible mitigation (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal. 3d 376, 403). We note that such a mitigation must be adopted by the Lead Agency unless the Lead Agency can demonstrate that the mitigation is truly infeasible (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal. 4<sup>th</sup> 341, 368).*

Further, The Coalition believes any increase in density over R-1 is financially deleterious to the City of Los Angeles. The Local Agency Formation Commission (LAFCO) in a study proved that the San Pedro area lacks sales tax income generators such as shopping malls and auto dealerships which are enterprises that adequately support city services. In normal times, let alone in today's projected long term economic downturn, can the City of Los Angeles take on additional financial burden while the City is struggling to meet its annual service budget?



B84-6 (Cont)

B84-7

B84-8

B84-9

The City of Los Angeles would be well served in performing a 'feasibility study' and challenge the developer in its DEIR as to how the negative impact would be mitigated.  
Why should Ponte Vista benefit at the expense of the Los Angeles City Tax Payer; an expense which would go on in perpetuity?

↑  
B84-9  
(Cont)

Signed: John G. Miller, MD.FACEP  
cc: Joe Buscaino, Councilman, District 15

---

**Woman is 53 But Looks 25**

Mom reveals 1 simple wrinkle trick that has angered doctors...

[ConsumerLifestyleMag.com](http://ConsumerLifestyleMag.com)

From: **patrick chartrand** <[pgadog1@sbcglobal.net](mailto:pgadog1@sbcglobal.net)>  
Date: Sat, Jan 5, 2013 at 1:40 PM  
Subject: Ponte Vista Development  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>  
Cc: "[councilmember.busciano@lacity.org](mailto:councilmember.busciano@lacity.org)" <[councilmember.busciano@lacity.org](mailto:councilmember.busciano@lacity.org)>

Dear Erin Strelich & Joe Buscaino

Re: Ponte Vista ENV 2005-4516-EIR

We are Senior Citizens and have lived on Redondela Dr in RPV approximately across the street from this proposed development for many years. Although the Blighted Naval Residences has been vacant for many years, it has kept the Automobile traffic on Western Ave down to an "almost reasonable level" "Almost" We said

We certainly do not want to see Automobiles belonging to 1135 Unit Owners having to access Western Ave or Palos Verdes Dr North. If this were to happen it would create another "405 type congestion". I'm not sure that I want to see Alt B (385 SFR unites either!. I do understand that the builder must have some kind of development so he can come out on this project if it is allowed.

Alt B would allow adequate OPEN SPACE which we all would be grateful for.

Sincerely

Patrick & Barbro Chartrand  
1957 Redondela Dr.  
Rancho Palos Verdes, Ca. 90275  
[310-832-7691](tel:310-832-7691)

B85-1

From: **Donald Dickson** <[donalddickson@gmail.com](mailto:donalddickson@gmail.com)>  
Date: Sat, Jan 5, 2013 at 3:12 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin Strelich

Planning Assistant

Los Angeles Department of City Planning

[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

**Re: Ponte Vista ENV-2005-4516-EIR**

Dear Mr. Strelich,

It has come to my attention that some people still cling to the idea that we can build single-family only homes at Ponte Vista. After meeting with the project team involved in entitling Ponte Vista and looking at all of the plans for the project including the single-family only option, I believe that it would be terrible and a real disservice for our community if the option approved to be built was the single family home option.

Our economy is still in the early stages of recovery and honestly, I do not see how the market possibly exists for that amount of single-family homes or for the prices that would be associated with them. There is another development in the community that is promoting single family homes and although the signage is still up, there has been no visible change on the site for a very long time. Another reason I am against the single family home option is that it provides no significant open space where neighbors can gather or where an internal sense of community culture can be established. Our harbor community is constantly asking for more open space options where families can congregate, parks where sports can be played or playgrounds for the youngsters. This option provides none of this and in fact potentially increases the demand for open space elsewhere that just is not available. To build out this large property so that it mirrors older area neighborhoods is a foolish and extravagant waste and those demanding this option have no concept of the bigger picture or the real needs of our community.

In my opinion the option of the 1135 unit plan for Ponte Vista would better serve our San Pedro and harbor community's needs and economic base. This option would provide a variety of housing types that will cater to many different kinds of households – single people just starting out; families with children and seniors looking to downsize. So many more people, regardless of differing income levels, could have the opportunity to find and qualify financially for homes that

B86-1



meet their individual needs and desires at Ponte Vista. This option (as well as the 830 unit alternative) provides the open space needed to well serve those living on the site with playgrounds and the community center; giving options for residents and their recreational opportunities. The larger harbor community also can benefit from being able to utilize the hiking trails. Both the 1135 and the 830 plans incorporate a significant number of single family homes designed in such a way that maximizes the use of space rather than squanders it. The 1135 unit option is the best option in my opinion for this project in this location.

I leave you with these final thoughts:

- It is time to lead and stop holding back progress and allow this project to move forward. It is time to remove the eyesore of the boarded up housing.
- It is time to bring constructions jobs to San Pedro.
- It is time to increase the amount of new, affordable housing options to San Pedro.
- It is time to break the constant bickering and concentrate on doing something positive for the community.


Sincerely,

Donald Dickson

San Pedro Resident

[310-831-0869](tel:310-831-0869)

B86-1  
(Cont)



From: [det310@juno.com](mailto:det310@juno.com) <[det310@juno.com](mailto:det310@juno.com)>  
Date: Mon, Jan 7, 2013 at 4:52 PM  
Subject: Comments on Ponte Vista ENV-2005-4516 DRAFT EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

I hereby submit as my comments, and adopt as my own, the comments submitted by NWSPNC, R Neighborhoods R1, San Pedro Peninsula Homeowners Coalition, and Rancho Palos Verdes.

I do this in order to preserve my right to raise the issues in those comments in all further future proceedings.

Chuck Hart, President  
SPPHU, Inc.

B87-1

From: **Donna Sumich** <[danitsas@yahoo.com](mailto:danitsas@yahoo.com)>  
Date: Sat, Jan 5, 2013 at 4:47 PM  
Subject: POINTE VISTA DEVELOPMENT  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

PLEASE KEEP THE DEVELOPMENT RI AS IT IS ZONED NOW REGARDING  
POINTE VISTA DEVELOPMENT.



B88-1



From: **Ashley Grayson** <[agrayson1@mac.com](mailto:agrayson1@mac.com)>  
Date: Sat, Jan 5, 2013 at 5:46 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

As an experienced technology futurist and successful business person and investor and resident of San Pedro, I feel compelled to comment on the Ponte Vista project.

I have two observations as to why the past and present proposals for Ponte Vista are totally unjustifiable and wrong. The first proposal has already failed and the current proposal (both density options) must be refused also.

The factual reasons are that the property is totally inappropriate for development as residential housing of any density:

The proposal shows only two access roads (onto Western Avenue). This is unsafe and unmanageable and all attempts at mitigation are simply playing with words. Any kid can explain the flaw: sucking soda through two straws in the same glass (the property) can't get more soda than you can swallow (the length of Western Avenue).

The property is too close to both the Defense Logistics Fuel Depot and Rancho Holdings. No sane person would build homes near a fuel depot.

The property lies across an earthquake fault and includes a drainage path on the southern boundary.

The increased traffic of the new residents will devastate traffic patterns along Western Avenue not just for future Ponte Vista residents but all of San Pedro and RPV.

The business reasons driving this proposal rest on the greed and disrespect of the developers for the community. Seeing only acreage and willfully ignoring all the logistical realities of the property, their only vision is the most profit which comes from medium to high density housing. All of their studies and mitigation plans are just smoke and mirrors to gain approval for something that should not be done in the first place.

If I'm grasping the developer's plan correctly, they plan to wholesale the types of construction to different builders and be off with their profits before anything is built. This is dangerous in a time of massive foreclosures, weak housing and little demand.

The current proposals are a jumble of every type of unit: single family homes, townhomes, condos and apartments. This is not planning, this is trying everything in the hope that something works. With four types of usage, it is hoped that at least one of them will be more viable than the others and down the road the developer/constructors can claim that a quarter of the project is successful even if it becomes mostly a failure. Intelligent mixed use is not a mindless jumble. Both of the current proposals are flawed in both vision (there is none) and in execution (too many community impact aspects omitted).

B89-1

B89-2

B89-3

B89-4

B89-5

The Ponte Vista project is also brewing a big lie: the idea that something should be done with the property so we may as well accept this wrong headed mess. When asked, "How do you invest your cash?" Warren Buffett has said, "Holding an asset is comforting. Some weeks I don't invest at all; no reason to rush when there's no clear advantage." There is no clear advantage to allowing the developers, who have no idea what to do with the property and who willfully ignore the downsides of the only idea they have for maximum personal gain at San Pedro's expense.

My second observation and reason I believe nothing should be done for the next few years is that we are just beginning to see a revolution in construction materials and techniques. Not just nanotechnology but revolutionary composite materials and techniques that can dramatically enhance what can be built.

The Ponte Vista project as proposed would squander a valuable asset (the property) on the last gasp of old fashioned construction, when by holding out for something better will enable San Pedro to have a first of its kind development, assuming the real faults of risky location, traffic impact and unknown consumer behavior changes can be accommodated.

Ashley Grayson  
1342 18th Street  
San Pedro, CA 90732

B89-6

From: **Canine Retreat** <[jeff@canineretreat.com](mailto:jeff@canineretreat.com)>

Date: Sat, Jan 5, 2013 at 5:54 PM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear **Erin Strelich**,

I am a business owner in Harbor City. In my opinion, the new owners have done an excellent job of reaching out to the community and taking on board the ideas and feedback from previous plans.

Now, we have a plan that truly reflects what the majority of our community want for Ponte Vista—livable housing with on-site amenities like playgrounds and a community center. Open space to walk and hike, with a variety of housing types for different kinds of families or singles.

Finally, we will have a beautiful community on Western Avenue rather than an eyesore that drags the whole neighborhood down. People will want to live at the new Ponte Vista. I support the 1135 plan or the 830 unit alternative. Let's build something positive for our community.

B90-1

Thanks,

Jeff Yablonovitz

--



25930 BELLE PORTE AVE

☒ HARBOR CITY, CA 90710

☒ **PHONE: 310-530-0800**

☒ FAX: 310-530-0802

☒

From: <[tijohur@aol.com](mailto:tijohur@aol.com)>  
Date: Sat, Jan 5, 2013 at 7:47 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

As residents of the Rolling Hills Riviera which the development of Ponte Vista will directly impact, we recommend Alternate B: "No Project Alternative/Single Family Homes" and respectfully request to keep the development R1 as it is currently zoned.

B91-1

Thank you,  
John & Tina Hur  
1940 Galerita Drive  
Rancho Palos Verdes, CA 90275

From: **Jim Litzel** <[litzelj@gmail.com](mailto:litzelj@gmail.com)>  
Date: Sat, Jan 5, 2013 at 9:56 PM  
Subject: Ponte Vista project.  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

I am against the Ponte Vista Project.



B92-1

Jim Litzel  
26221 Governor Avenue  
Harbor City, CA 90710

From: **julie contreras** <[contrerasjulie@hotmail.com](mailto:contrerasjulie@hotmail.com)>

Date: Sat, Jan 5, 2013 at 10:47 PM

Subject: Ponte vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Hi, I am a resident of San Pedro. I was born and raised here. I remember the old navy housing very well. I support R1 zoning of that land and I strongly object to Alternatives A and C. I have many family members and numerous friends in town that all feel the same way.

B93-1

Please don't let them over-build this beautiful area!

Thank you,  
Julie Anderson Contreras

2004 Velez Drive  
Rancho Palos Verdes, CA 90275  
January 2, 2013

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 23 2013

ENVIRONMENTAL  
UNIT

Re: Ponte Vista DEIR  
ENV-2005-4516-EIR

Dear Ms. Strellich:

I am writing to you about the draft Environmental Impact Report recently submitted to the city by the group which seeks to develop Ponte Vista. In particular, I want to register my disappointment with the timing of the report and to question the optimism of its conclusions, especially those about water usage.

**Timing.** Though I am a resident of Rancho Palos Verdes, my family's home is in a tract that lies immediately across Western Avenue from the proposed project and will almost certainly be impacted by it. Given the effect the project will have on our area, my neighbors and I would request more time to review the report and provide comments about it. I base this request on: a) the report's nearly 1400 page length, b) the fact that it was not made available to area residents until the Holiday Season – when most of us had other commitments which kept us from giving attention to it – and 3) the added fact that these same residents and their children and in turn their children will have to bear any burdens created by the project and the decisions made by your department. Under the circumstances, a short extension – 90-days, for example – does not seem unreasonable or likely to impose any hardship on the developer.

B94-1

Though family commitments over the Holidays have kept me from giving the report as much attention as I would like, I did find some time to look over its discussion about a subject that has interested me for some time: fresh water usage and availability. That review raised several questions which, unfortunately, appear to remain unanswered in the report.

**Water Usage.** Ponte Vista's developer claims in its DEIR states that the project's water usage will have a "less than significant impact with mitigation" on the area's infrastructure and environment. (p. VI-142). A brief examination of the document raises serious questions about that conclusion and suggests that it is much too optimistic.

B94-2

1. **Estimated vs. Actual Usage.** The developer estimates that the 1,135 unit project will use 216 acre feet per year of water. (p. I-135). That translates to 170 gallons per day per unit. However, that figure is far below what experience has shown constitutes actual use. The United States Environmental Protection Agency has found that the average American household uses 400 gallons per day. ("Water Sense," an EPA Partnership Program at



[www.epa.gov/WaterSense/WaterUseToday](http://www.epa.gov/WaterSense/WaterUseToday)). In Southern California, where residents may be more sensitive about conserving fresh water, the Los Angeles Department of Water and Power (LADWP) reports that the average single family residence consumes 359 gallons each day. (Los Angeles Department of Water and Power, 2010 Urban Water Management Plan [hereinafter referred to as the "UWMP"], p. 43). In other words, the developer estimates that Ponte Vista will use less than half the water which the LADWP finds actual households really use.

B94-2  
(Cont)

2. **Mitigation.** The DEIR offers little explanation – beside mitigation measures such as flush-less urinals in the project’s common areas and low-flow shower heads and “green” appliances in the residences (p. IV O-10) – for this very significant discrepancy. Yet these measures are already widely employed in the community and should therefore be reflected in the 359-gallon figure which the 2010 LADWP plan cites.

B94-3

The DEIR does make reference to “purple pipe” – that is, plumbing which will capture and conserve gray water – in the project’s units. (p. IV O-11). As commendable as this feature might be, the report goes on to suggest that the infrastructure needed to collect and reuse such water is not in place. Moreover, there is no mention when, if ever, it will be. In short, purple pipe will not mitigate water use at Ponte Vista for the foreseeable future.

B94-4

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

B94-5

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

B94-6

Freshwater is too important a resource to be the subject of guess work. Under-estimating its usage and over-estimating its availability can have cataclysmic effects upon Southern California. These include serious economic dislocation and even health issues for area citizens. Given the discrepancies between the developer’s estimated water use and the EPA and LADWP’s experience about actual levels of consumption and further questions about the LADWP’s ability to supply water in the not-too-distant future, I would ask that your department scrutinize closely this project’s impact on the area’s water infrastructure.



Please do not hesitate contact me at (310) 831-3033 or [gcornell6@gmail.com](mailto:gcornell6@gmail.com) if you have any comments about these concerns or questions about this letter.

Thank you.

↑  
B94-6  
(Cont)

Sincerely,



Glenn Cornell

cc.: City Councilman Joe Buscaino

Comment Letter No. B94 (Cont)

Glenn Cornell  
2004 Velez Drive  
Rancho Palos Verdes, CA 90275

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CITY OF LOS ANGELES

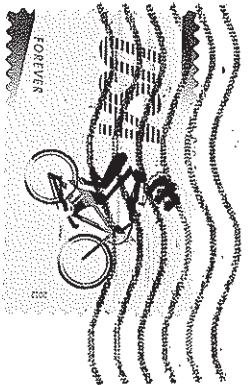
JAN 23 2013

ENVIRONMENTAL  
UNIT

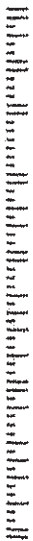
Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

SANTA ANA CA 92705

03 JAN 2013 PM 11 L



90012324375



From: **Mark Begovich** <[elbego@sbcglobal.net](mailto:elbego@sbcglobal.net)>  
Date: Sun, Jan 6, 2013 at 9:51 AM  
Subject: PonteVista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I am opposed to anything being built on the Ponte Vista property that is above the 500 units that the zoning allows . That is the law and these crooks have been trying to break that law for years . MARK BEGOVICH , San Pedro

B95-1

TO: ERIN STRELICH, PLANNING ASSISTANT AND OTHERS

RE: PONTE VISTA PROJECT

COMMENTS SET FORTH HEREIN...

My Name is David Harriman. I reside at 27630 Tarrasa Dr Rancho Palos Verdes. I have bought a house here 1 year ago as this seems like a wonderful place to raise a family.

However, **I am particularly concerned and opposed to the proposed Ponte Vista Project.** My property is on the other side of Western directly across from this proposed project.

**If it was all single family homes**, then I am all for developing the area...but would still be concerned with additional congestion as it relates to traffic as Western Avenue seems to be the only proposed route. As I use Western Avenue daily and I have no other way out I am concerned with the increased traffic congestion. Is there no other alternative route..??

B96-1

Since the Project proposes (or allows) up to 392 rental units or up to 35% of the entire project I am even more concerned. I also notice the proposal for buildings up to 4 stories in height. **With this proposal I am very strongly opposed** as I can just imagine these people looking directly in my yard from across the street. **THIS TO ME INVADES MY PRIVACY!!** That is quite a sum of rental units being proposed which leads to a large concentration of people in a relatively tight area. This will lead to more **traffic congestion** with so many more cars and most likely and ultimately **more crime** with so many people.

Also of concern and **disturbing to me is to read that “noise, air quality and vibration impacts would be significant and unavoidable”**. This is concerning and really should be addressed.

**Also, of concern is the quality of life for me and my family if this passes.** I can't imagine being in a constant state of chaos and frustration for 14 years of construction and development as this says it will not be complete until 2027.

B96-2

Even though I only been here a year and really wanted to live here for many years to come I feel like my home and quality of life will change for the worse if the project the way it is proposed would pass.

I really do not think only having 1 access road thru Western would be sufficient for so many units (1135).

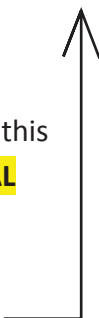
B96-3



**PLEASE, PLEASE, PLEASE DO NOT APPROVE THIS PROJECT THE WAY IT IS PROPOSED. MY QUALITY OF LIFE is Important to me** and my family and I would very much like to believe in this community I bought into. **PLEASE DO NOT APPROVE THESE EXCESSIVE NUMBER OF RENTAL UNITS..!! DO NOT APPROVE THIS PROPSAL OF UNITS UP TO 4 UNITS IN HEIGHT!!**

**PLEASE. PLEASE. PLEASE.**

B96-3  
(Cont)



Sincerely,

David Harriman

27630 Tarrasa Dr

Rancho Palos Verdes 90275

Ph# 626-221-5044

From: **Gail Noon** <[gailmaria51@att.net](mailto:gailmaria51@att.net)>  
Date: Sun, Jan 6, 2013 at 10:28 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I want the number of homes at Ponte Vista to be only 830 stand alone single-family houses, or even less if possible.....because not just at rush hour -- but *anytime* of a weekday or weekend now, Western Avenue can quickly become total gridlock, and accounting for at least 1 car per household (and there will probably be more per family0, that means there would be *at least* 830 more cars on Western Ave *each day*, once Ponte Vista is built.

B97-1

That is *way too many* for Western Ave. to have to handle.

Gail Noon  
San Pedro, CA  
[gailmaria51@att.net](mailto:gailmaria51@att.net)

From: <redmatt8@aol.com>  
Date: Sun, Jan 6, 2013 at 10:30 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strellich,

I recently went to two Northwest San Pedro Neighborhood Council meetings and was floored by the news of I-STAR Financials' Pointe Vista project. Many members of that council, as well as other volunteers from the community, studied the Environmental Impact Report from the housing development and created an official response. That response is spot on in exposing how inconclusive, inadequate and deceptive the Pointe Vista EIR is. There is no way in hell that the L.A. City Council can accept the validity of this EIR once it studies the NWSP Neighborhood Council response.

The L.A. City Council needs to study the response in order to recognize I-STAR's refusal to honestly report the truth regarding the Pointe Vista housing project. The truth is that Pointe Vista would wreak transportation chaos and environmental danger on the lives of the San Pedro community and parts of the Wilmington, Harbor City and Palos Verde communities as well.

Putting an over-crowded, privately-gated community in SP goes completely against the very character of our town. The traffic Pointe Vista would create on Western Avenue and many other streets would create a hellish daily gridlock. The auto effluents of such traffic would create a greenhouse gas effect that comes directly in conflict with California's official emission standards. Our community already suffers enough because of the air pollution directly attributable to the oil refineries, diesel trucks and port shipping activities! *WHY would the council possibly inflict worse environmental conditions upon us?*

I-STAR's goal is to take a beautiful piece of property, much of it presently open space with hiking trails, and cram as many structures in there as possible. They have even taken their planned public park OUT of the equation and covered it up! HOW COULD ANY of the POINTE VISTA plans be beneficial to the quality of life for the people of San Pedro, much less that of the future sardine-packed inhabitants of Pointe Vista???

AND WHY IN HEAVENS NAME would the LA City Council allow a housing project to be built very close to a gigantic oil refinery when the cancer rates of such future inhabitants would clearly skyrocket? To top that, the Pointe Vista project would be built even closer to the U.S. Defense Fuel Supply Center. Allowing anyone to live next to these large, dangerous underground fuel tanks is morally and politically reprehensible!!! Are you really going to permit the building of a new Love Canal in our beloved city?

What is this council thinking? Are they so desperate for city revenues that they would put so many lives at stake? Who the hell do they represent -- the people of L.A. or the corporations that have filled their election coffers? SHAME ON THEM ALL! We need Joe Buscaino and the rest of the council to become our heroes, not our executioners!

I am 55 years old and have lived most of my life in the county and city of L.A. In that time, L.A. has allowed development projects to gobble up almost every open space in our city. *IT HAS GOT TO STOP! POINTE VISTA HAS GOT TO STOP!* Study the EIR response by the NWSPNC and SEE FOR YOURSELF! *Why would the council even think about doing business with i-STAR (or any other company) which is so obviously comfortable about deceiving our city regarding the very real and dangerous costs we will all have pay if this project goes through?*

This development project needs to be shut down by the council A.S.A.P. **The San Pedro community stands firmly against Pointe Vista and so should the L.A. City Council.** Buy up the land for the city or claim it under eminent domain. Clean it up and make it open public land for all of the city's inhabitants

B98-1

B98-2

B98-3

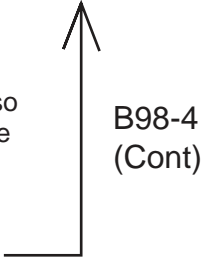
B98-4



to enjoy! Make it a cozy public park and a jewel for South L.A. The people of San Pedro and all of the port communities would thank you for your collective concern. We should all be willing to sacrifice now so that future generations do not suffer from our short sighted development mistakes. Please help save one of the last open spaces in the our area from being destroyed in the name of profit.

I thank you for your cooperation in this matter.

Sincerely,  
Matthew H. Scanlon  
386 S. Miraleste Dr. #468  
San Pedro, CA. 90732  
[310-833-7712](tel:310-833-7712)  
[redmatt8@aol.com](mailto:redmatt8@aol.com)



B98-4  
(Cont)



From: **Jeff Burger** <[jeff@twylaburger.com](mailto:jeff@twylaburger.com)>  
Date: Sun, Jan 6, 2013 at 11:22 AM  
Subject: PonteVista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin Strellich,

My 2 cents:

The Ponte Vista development should be a shining example of creating a California Natural Environment area right in the heart of San Pedro. The houses should be razed and that's about it. Tear down the fences and let it be.

-Jeff Burger



B99-1

From: **Craig A Siegman** <[csiegman@sbcglobal.net](mailto:csiegman@sbcglobal.net)>  
Date: Sun, Jan 6, 2013 at 11:40 AM  
Subject: Support of Alternative B "No Project Alternative/Single Family Homes"  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin Strelich, Planning Assistant

I am **against changing the exiting zoning** from R-1 so that the developer who purchased the property knowing that it was zoned R-1, can construct more housing units to increase his profit at the expense of the community. I therefore **support Alternative B "No Project Alternative/Single Family Homes"**.

Now more than ever it is important that this property remain zoned R1.

The area has been built up over the years. As a result, the traffic on Western Ave has become a real problem. Western Ave is one of only two routes into San Pedro, so its congestion has a great impact on the community.

As a result of the additional traffic and more people living in the community, air pollution has become a real concern.

If this request is granted, it will result in many more people living on a piece of land that was zoned for many fewer people. The additional people will only add to the community's concerns and exacerbate the problems we are facing.

I don't think that it is right for for a developer to purchase a property predicated on, and with his full expectation, that he would receive a zoning change. I know fully that if I would want to have my property rezoned from R1 my request would be denied. I would probably be told "you knew when you purchased the property that it was zoned R1, so why would you expect it to be rezoned". Yet the developer's request, which is on a much larger scale and would certainly have a more negative impact on the community, receives very serious consideration. Why is that?

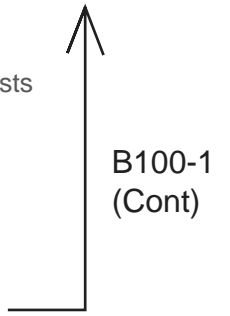
B100-1



I strongly feel that the request should be denied. To grant it would be to place the developer's interests over the citizens who already live there.

Thank you for your consideration.

Craig Siegman



From: <[vcarrolle@cox.net](mailto:vcarrolle@cox.net)>  
Date: Sun, Jan 6, 2013 at 11:51 AM  
Subject: PonteVista ENV-20054516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Density and traffic are still a major concern. There are very few alternative routes out of this proposed development.

Traffic is already a nightmare in this area. The residential area around this development has grown exponentially since it was Navy housing, not to mention the addition of two high schools.

I don't think the EIR adequately addresses this issue. On a conservative basis, presuming 2 cars per household, that puts 1,660 more cars on those streets every day. 1,660 cars with limited access to major thoroughfares and those streets have only TWO lanes in either direction.

What about sewage, vermin? Has anybody thought about what is going to happen to the surrounding area once the existing housing is torn down.

Having lived in this area when Friendship Park and the Gardens were under "construction" we can attest to the fact the we had to contend with field mice as the land was being cleared as there were no significant structures being torn down.

We are realistic enough to know that something will be built there. It is inevitable. All we ask is that common sense enter into the decision as well as the "common good". If that happens, then no more than 500 SFR will be permitted.

Victoria & John Carrolle

B101-1

B101-2

From: **Craig A Siegman** <[csiegman@sbcglobal.net](mailto:csiegman@sbcglobal.net)>

Date: Sun, Jan 6, 2013 at 11:55 AM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I am very much opposed to expanding the development beyond the current R1 zoning. I therefore support ***Alternate B: "No Project Alternative/Single Family Homes"***.

*Anne Marie Siegman*

B102-1

From: **Richard Hulett** <[dickhulett@yahoo.com](mailto:dickhulett@yahoo.com)>  
Date: Sun, Jan 6, 2013 at 12:41 PM  
Subject: Fw: Ponte Vista Env-4516-EIR  
To: [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

----- Forwarded Message -----

**From:** Richard Hulett <[dickhulett@yahoo.com](mailto:dickhulett@yahoo.com)>  
**To:** [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)  
**Cc:** councilmember. [buscaino@lacity.org](mailto:buscaino@lacity.org); [board@nwsanpedor.org](mailto:board@nwsanpedor.org)  
**Sent:** Sun, January 6, 2013 10:54:08 AM  
**Subject:** FW:Ponte Vista Env-4516-EIR

Dear Erin

Please keep Ponte Vista R-1 zone. There are a number of apartments that are not fully rented on Western. Its hard for us to get out of our neighborhoods. There not enough single family homes with backyards for kids to run around in the area. Please keep the homes R-I= Alternate B single Family homes.

B103-1

Sincerely

Lupe Hulett

From: **Jane Early** <[geojaneo@ca.rr.com](mailto:geojaneo@ca.rr.com)>  
Date: Sun, Jan 6, 2013 at 12:55 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I strongly oppose any thing other than single family homes for Ponte Vista. Western Avenue cannot handle any more traffic and density!

Since the Ponte Vista owners feel they must build something ----- San Pedro/Lomita could use some nice new single dwellings. NO ON MULTI UNITS OF ANY KIND.

B104-1

M. Jane Early  
1742 Miracosta St.  
San Pedro, CA 90732

From: **z zuli** <[zuli6@hotmail.com](mailto:zuli6@hotmail.com)>  
 Date: Sun, Jan 6, 2013 at 1:46 PM  
 Subject: Ponte Vista No. ENV-2005-4516-EIR  
 To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin Strelich,--- I am opposed to the Ponte Vista zoning change. It has been clear that the community has put forth valid reasons rejecting rezoning in the pass regarding similar plans at this location. Nothing has changed except the owners. The present owner purchased this property as R1, fully with the knowledge that the San Pedro community did not support passed attempt to change the zoning. Perhaps all the 1000's of disapproval signatures regarding passed attempts to change the zoning need to be recalled by the City planners. The community is growing weary of signing petition addressing the same attempts in rezoning this property. I'm sure that this is the hope of the developer but the City must recognize the truth in this matter. The truth is, it is not in the best interest for San Pedro and the community. Even without this project the issues San Pedro faces in the future are the traffic that continues to grow, the lack of modern medical facilities, the over crowded existing schools, the eroding public works concerns ( remember the sink hole on Western that took almost a year to fix), the nonstop Public Work Dept. job (pumping station, etc.) directly across from this planned community and the list of insignificate opinions that the city produce in your DEIR ( which would add up to more than a mole hill), the growing population of Rancho Palos Verdes use of San Pedro roads to access freeways are just a few reasons this project should be denied. Don't forget all those condos downtown San Pedro that the Planning Dept allowed and the condo growing population will have in this community if they ever get full occupancy. What would service this community most are single family homes, where people can see the existing family generation grow. San Pedro has a long history of generations which stay in the community. We expect yards for our small children to play and to have large family bar-b-ques in while our older children play baseball in the streets with neighborhood children and make friends that last a life time. This gives our children the understanding of family and community, part of the American dream which is lacking heart in this project.

B105-1

In the cities consideration of this project please don't forget the unplanned storm, Katrina; the unplanned storm and flooding in New Jersey and perhaps the great chance of earthquake and yes ,even flooding in San Pedro and the neighboring Rancho Palos Verdes (R.P.V.). If in fact, the original shore line of San Pedro is Pacific Ave. and if the brakewall fails and flooding occurs during an extreme heavy storm where does the overflow storm water to drain? Is the city certain R.P.V would not be impacted from flooding. What would be the impact to R.P.V. with the existing aged storm drains on the other side of Western Ave opposite the Ponte Vista Planned Project? What would be the drainage backup impact and the financial obligation cost of the L.A. city to replace or repair the old C.M.P. failure of the private drains, like the one on Colt Road (Miraleste Creek area), storm drain#286 and all it's tributaries when flooding occurs in R.P.V (plus other damaged cost like home damaged). L.A. City accepted the operation and maintenance of the drains in Tract No#26331 (Drain #286 Plus) in May 1965. Are any pipes planned to tie into lines onto Western or above (water, sewer or drainage etc.)? What is the impact if not already address. I hope L.A. City will have learn lessons from the possible unlikely events that can occur and STOP over loading unwanted development in this community.

B105-2





Oh yes don't forget the underwater springs. Is that on Gaffey and Westmount? Just think, traffic increase towards grammar school and continuation school, children being drop off for school while driver heading towards flooded Gaffey to hit the freeways to get to work. The Joy to start the day due to this project if approved.

B105-2  
(Cont)

I realize the L.A. City would reap financial gains from the Ponte Vista rezoning project no matter how unfavorable the community views it. The city maybe even able to justify a poor decision (in my opinion) if they choose to allow the rezoning to go forward but the timing of public review during the Thanksgiving, Christmas and New Year holiday season did not benefit the general public review of such an extensive report. As a slow reader, I was able to get through a little over 100 pages of the 700 plus report. Over the review period, I had set travel plans, an under the weather issue, grandchildren out of school to watch, a home and a Christmas tree to decorate, shopping and other holiday fixings including preparing food for New Years football games. This may sound trivial to the city but I am only one of many that has not been able to read the complete report, let alone digest correctly to respond to what negative impact it would mean to San Pedro and the surrounding towns. If the city is incline to favor this project I ask for an extension for public review. I'm hoping the developer will take a closer look at the possibility that there may exist a profit in single family homes which surly this community would gladly support and welcome.

B105-3

In Nov., I had a chance to go to two libraries (San Pedro and Miraleste) that were mention in the notice letter I received dated Nov. 8, 2012 from the L.A. Planning Dept. Neither of these libraries had a notice on their general notice board of the fact that the environmental impact report was there for their veiwing. At the San Pedro Branch, I asked at the Information Desk about the report, he was clueless. I showed the letter I received from the Planning Dept. (Nov.8,2012) and asked if he would put a copy up, his reply was he would have to have a OK from his boss. It took a good 30 minutes before the report turned up. On Dec.18, two weeks latter, I return to the library, still no notice placed on board. Spoke with the same man at the information desk, he could not recall our conversation. At the Miraleste Library, there was also no notice of the report or knowledge of one. She said if they had one it would be at this location, it was- along with the letter. What is the point of the Planning Dept. sending report to libraries if they are not instructed to post notice to general public about a major rezoning issue facing its community?

B105-4

By looking at the mapping, I do not see the 15 acres open space thought to be a condition of development. Recreational areas seem to have been lessen therefore this new population would impact the already existing overloaded ones. How many new sport teams will need to be created to let a little one play maybe two games a seasons. Oh boy! I could go on but I would like you to added me to all lists that find this project unacceptable in any other consideration that I have not listed. Thanks for your time and consideration from one of many warriors over this rezoning issue. Do what is right.---Barbara Zuliani ----2756 Colt Road, Rancho Palos Verdes, Ca. 90275

B105-5

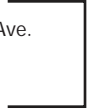


From: **RICHARD J BRUNNER** <[carboat65@sbcglobal.net](mailto:carboat65@sbcglobal.net)>  
Date: Sun, Jan 6, 2013 at 2:45 PM  
Subject: Ponta Vista ENV-2005-4516-EIR  
To: [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

To whom it may concern,

Our community is located almost directly across from the Ponta Vista site. We are and have always been concerned with additional traffic on Western Ave. We believe Ponta Vista should be only single family homes or another use that would have a lesser traffic impact on Western Ave.

Respectfully,  
Richard J. Brunner  
President  
Peninsula Verde Homowners Association  
1906 Peninsula Verde Drive  
Rancho Palos Verdes Ca. 90275



B107-1

From: **stockett** <[stockett@cox.net](mailto:stockett@cox.net)>  
Date: Sun, Jan 6, 2013 at 3:10 PM  
Subject: Ponte Vista development  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I am in favor of development R1, Alternate A. Please keep the development R1.



B108-1

Marge Stockett  
Avenida Aprenda

From: **lupe grajeda** <[l.grajeda@hotmail.com](mailto:l.grajeda@hotmail.com)>

Date: Sun, Jan 6, 2013 at 3:30 PM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I drive from Lomita to San Pedro 3 times a week to manage my rental property and to visit my son. I make it a point to finish my business and get out of San Pedro before 2 pm. The Dodson, Crestwood, Mary Star and Lutheran School traffic is horrendous and stressful. I have given up shopping in San Pedro because it is just too crowded and there is no parking. The people who want to build housing at Ponte Vista do not have to travel on the skinny two lane each way road. I was born in San Pedro and love the town, but I bought a house in Lomita because there is room to drive and there are no daily bottlenecks. I say do not add to the congestion on Western Avenue!

B109-1

From: **DIANE DOOLEY** <[dooleydcm@gmail.com](mailto:dooleydcm@gmail.com)>  
Date: Sun, Jan 6, 2013 at 4:06 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelch@lacity.org](mailto:erin.strelch@lacity.org)

Ms. Strelch:

Thank you for taking comments regarding the Ponte Vista development.

As noted in the various documents and stated many times over, the Ponte Vista development will impact traffic and pollution. Only two streets lead in and out of San Pedro, Western and Gaffey. Traffic is already backed up on both streets. No matter what intersection improvements are made, it's still only two streets and the addition of many more residents. Keeping the number of residents to the minimum is a requirement, not an option. It's the health and safety of the people that are at stake. I'd prefer keeping the development to the former 245 single-family homes, but I know the realities of living in this area. All efforts to keep then number of units to a minimum and to mitigate the effect of traffic and pollution will be greatly appreciated.

B110-1

Thank you again,

Diane Dooley

From: **Joe & Janet Lauro** <[jlauro@sbcglobal.net](mailto:jlauro@sbcglobal.net)>

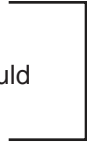
Date: Sun, Jan 6, 2013 at 4:09 PM

Subject: Ponte Vista

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

This email is in regard too Ponte Vista:

Please keep the development R1 as it is currently zoned. Higher density is no longer needed and would cause much environmental and traffic concerns.



B111-1

Thank you,  
Janet Lauro

From: **Helen** <[joneshelene@aol.com](mailto:joneshelene@aol.com)>  
Date: Sun, Jan 6, 2013 at 4:11 PM  
Subject: Fwd: Your Ponte Vista Comment  
To: [ksmith@klct.com](mailto:ksmith@klct.com), [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

My original posted comment was:

[Helen Jones](#)

Pointe Vista: I haven't been involved in this situation other than reading about the ongoing battles over the last few years. I noticed from a local publication that GreenHills was expanding and had this thought. If Greenhills bought PointeVista the problem would be solved. Beautiful, green, park like and no traffic increase.

B112-1

[Like](#) · · Unfollow Post · [January 2 at 5:16pm](#)

-----Original Message-----

From: Kristina Smith <[ksmith@klct.com](mailto:ksmith@klct.com)>  
To: joneshelene <[joneshelene@aol.com](mailto:joneshelene@aol.com)>  
Sent: Fri, Jan 4, 2013 3:29 pm  
Subject: Your Ponte Vista Comment

The Neighborhood Council president asked to email you and ask that you also submit your comment to Erin Strelch & Councilman Joe at the following e-mail addresses. Thank you.

Kristina Smith  
NC Assistant

Comments should should be addressed to:

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
Fax: [\(213\) 978-1343](tel:2139781343)  
Email: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Councilman Joe Buscaino  
Email: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

----- Original Message -----

**Subject:**Re: SUBMIT YOUR PONTE VISTA COMMENTS



**Date:** Wed, 2 Jan 2013 20:11:32 -0500 (EST)  
**From:** Helen <[joneshelene@aol.com](mailto:joneshelene@aol.com)>  
**To:** [ksmith@klct.com](mailto:ksmith@klct.com)

Here's what I'd like to see happen -  
Greenhills buys the property (it's right across the street from them).  
It would be beautiful and park like and have no traffic impact. Problem solved.



B112-2

From: **mrs G** <[mrsgreat@yahoo.com](mailto:mrsgreat@yahoo.com)>  
Date: Sun, Jan 6, 2013 at 4:19 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

To: Erin Strellich

Planning Assistant

Los Angeles Department of City Planning

200 N. Spring Street

Room 750

Los Angeles CA 90012

Re: Ponte Vista ENV-2005-4516-EIR

Dear Sir or Madam,

I am writing you this letter to express my concerns regarding the Ponte Vista housing project proposed for the 61.5 acres of former Navy housing at 26900 S. Western Avenue in San Pedro.

I do not wish to debate the specifics of the DEIR or reiterate all the negative impacts that a rezoned multi-unit (830 or 1135) housing option will bring to the area.

Instead, I would like to state that I am against any rezoned multi-unit development for one simple reason – this developer knowingly purchased the property zoned R-1 (for single family residences), and they should now only be allowed to develop to that R-1 level of density and no more. This means that a strictly single family residence option is the only one that should ever be allowed to proceed on this property.

If the R-1 level of density is not economically feasible for the developer to proceed with this project (as I believe he has indicated), then the developer made a bad business decision and the market should reward him accordingly. It is not the responsibility of the city or of the residents of this area to sacrifice their standard of living to subsidize a developer's profit margin.

B113-1

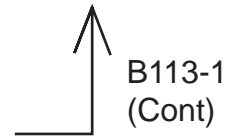


Thank you for allowing me to express my opinion for the record.

Marijan Grgas

2045 Trudie Drive

Rancho Palos Verdes CA 90275



B113-1  
(Cont)

From: **Jeanne Ritzke** <[jeanne.ritzke@att.net](mailto:jeanne.ritzke@att.net)>  
Date: Sun, Jan 6, 2013 at 4:41 PM  
Subject: Proposed Ponte Vista Development  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hello,

We are homeowners in the Rolling Hills Riviera Tract that is just south of the Green Hills Cemetery. We are strongly opposed to the proposed development of Ponte Vista with a possible construction of 1135 residential units. That property has always been zoned R-1 and I urge you to vote for the Alternate A proposal to either have no construction at all or alternately only allow R-1 single family residences on the property.

B114-1

Jeanne Ritzke  
Raymond Ritzke

From: **Cecelia Moore** <[moorececelia@aol.com](mailto:moorececelia@aol.com)>

Date: Sun, Jan 6, 2013 at 4:51 PM

Subject: ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Erin,

I am a member of Friends of San Pedro Library. I see in the Ponte Vista Environmental Impact Report the statement that "the San Pedro Regional Branch is of adequate size for the population served." The library is often very full, and patrons must wait for access to computers. The library needs many updates, including wi-fi and more electrical outlets. Perhaps the biggest problem for the service population--and any additional population--is the limited parking space. When there is a program at the library, attendees often must park blocks away, in residential areas because of the limited number of spaces in the very small library lot.

Where, in "West San Pedro" is the neighborhood branch going to be built? How many patrons is it expected to accomodate?

B115-1

Cecelia Moore

-----  
*Cecelia Moore*  
[moorececelia@aol.com](mailto:moorececelia@aol.com)

From: **Margaret Spinelli** <[mgt.spinelli@sbcglobal.net](mailto:mgt.spinelli@sbcglobal.net)>

Date: Sun, Jan 6, 2013 at 5:14 PM

Subject: Ponte Vista ENV-2005-4516EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strelich,

As a resident of Eastview since 1974 I have been following the fate of Ponte Vista for many years. I really encourage you to work to keep the zoning R1. Each time new developers becomes involved we hear how they intend to keep the zoning and provide many other "perks" for the community, but once the final plans are presented, there are majpr changes to the proposals. I encourage you to hold the currents developers to the single-family-home zoning and keep them accountable for the additional traffic that the new development will incur.

Sincerely,

Margaret Spinelli

B116-1

From: **Colomas** <[colomas@pacbell.net](mailto:colomas@pacbell.net)>  
Date: Sun, Jan 6, 2013 at 5:24 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>  
Cc: "[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)" <[councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)>

I support R1 zoning and still oppose this project as  
proposed in  
Alternatives A and C. Our area is congested enough  
and traffic is already a big problem.



B117-1

Thank you for your consideration,  
Deborah Coloma

Sent from my iPhone

From: **Lucie Thorsen** <[luciethorsen@gmail.com](mailto:luciethorsen@gmail.com)>

Date: Sun, Jan 6, 2013 at 7:47 PM

Subject: Ponte Vista ENV-2005-4516-EIRe

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strelich,

I write to express my concern over the newly proposed Ponte Vista project proposal. I sat on Councilwoman Janice Hahn's committee as the representative of the city of Rancho Palos Verdes. My husband and I live on Redondela Drive which is across the street from the development. We have also been very active with the grass roots RneighborhoodsR1 group. My involment then, as it remains now is my tremendous concern for San Pedro. Even though we have a R.P.V. address, we consider ourselves San Pedrans, as do most of us who live here, have attended San Pedro High, and have deep roots in the community.

The land is designated R-1 and has not been changed. I have not seen or heard one idea that has convinced me that it should be. The bottom line is that we do not need more projects that continue to ruin our town. During the 1950s through 1980s, this town was consumed by greed, single family home after single family home was torn down and replaced by apartment buildings.

We had breakfast at The Diner this morning, driving back home on both Pacific and Gaffey, looking East and West, are block after block of multi-family homes. The businesses along these two main streets rarely reflect the pride of a well planned community. Realtor and developer greed have driven the direction of our town and it shows. We have sold ourselves down the river too many times; The Hacienda Hotel sold and torn down to build what is commonly referred to as "the rabbit hutches on Miraleste Drive", and our fabled historic district torn down without a thought to the possibilities, to name a few.

It takes generations to turn a blighted downtown around. We have a good start on that right now, we need to support the housing developments downtown and not compete with them.

The developer had many recommendations from the Councilwoman's committee, and countless comments by individuals, over 16,000 signature petitions demanding the property remain R1, yet all of that is ignored, and they present a plan with 1100 plus units, little open space, gated, ridiculus traffic mitigations, and of all things apartments!!!, the last thing we need. Clearly, as a community, we have been dismissed. The last developer, Bob Bisno came in with an arrogant attitude towards us, after sitting through the latest presentation at St. Peter's church auditorium, I felt insulted, not only by the plan, but by the attitude towards San Pedro. They do not care about us! It's about the money. Had Bisno developed Ponte Vista as R1, we would not be having this discussion.

The developer does not care about our town, we can't let one more greedy entreprenour make us pay for decades for what we let him do to us. So because of the density, traffic, overall polution,

B118-1





lack of sufficient infrastructure, lack of esthetic thought, quality of life, the firm roots of our community, and the fact that we live on a peninsula, the Ponte Vista property must stay R-1.

B118-1  
(Cont)

Most sincerely,

Lucie Thorsen  
2124 Redondela Drive  
R.P.V., CA 90275  
[310-8336933](tel:310-8336933)

From: **Quentin/Helene Pizzini** <[pizzini3@cox.net](mailto:pizzini3@cox.net)>

Date: Sun, Jan 6, 2013 at 8:35 PM

Subject: "Ponte Vista ENV-2005-4516-EIR."

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

To Whom it May Concern:

My husband and I both want to comment on and both support the Ponte Vista plans.

We have lived in San Pedro since 1985 and I worked as the director of the local YWCA for over 19 years before my retirement three years ago. Through my employment, we learned how much need there is in San Pedro for this additional housing which is why we have also been long-time supporters of Ponte Vista. The project has been through several ownership and design changes, and this new Ponte Vista features homes that will suit the needs of San Pedro, with open space for the residents to enjoy, and a much-needed road to Mary Star High School.

We understand from meeting with the project team, that all the traffic impacts of the project can be fully mitigated with traffic improvements in the area. That is very important for the community. . We support the project at 830 units or 1135 units.

Thank you.

Respectfully,

Helene Sue Pizzini

Quentin Adley Pizzini

1431 S. Walker Avenue

San Pedro, CA 90731

B119-1

From: **CONSOLINA MCOSKER** <[daughter\\_nella@sbcglobal.net](mailto:daughter_nella@sbcglobal.net)>

Date: Sun, Jan 6, 2013 at 9:56 PM

Subject: ENV - 2005-4516

To: [Erin.Strelich@lacity.org](mailto:Erin.Strelich@lacity.org)

Dear Erin,

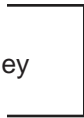
I live in the Northwest San Pedro neighborhood and I am in agreement with the NW San Pedro Neighborhood Council's Comments on Ponte Vista DEIR. Please consider these comments because they express the concerns of the community.

Sincerely,

Connie McOsker

515 Albro St.

San Pedro, CA 90732



B120-1

From: **Pat Akins** <[pfakins@yahoo.com](mailto:pfakins@yahoo.com)>  
Date: Mon, Jan 7, 2013 at 7:59 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

I live within a 1/2 mile of the proposed Ponte Vista project. I support R1 zoning and oppose the revised project as proposed in Alternate A or C.

We lived in the area when Navy Housing existed at the Ponte Vista site. Open space existed where there are now several apartment buildings, a strip mall and townhomes. Within the last few years 2 high schools and college dormitories have been added to the area, all spilling out onto Western Ave. No accommodations have been made on Western Ave. to mitigate the additional traffic that NOW exists. I have witnessed Emergency units unable to move through this traffic at times.

Please consider the needs of the residents of this community and keep it R1 zoning.

Sincerely,  
Patricia Akins  
26911 Lunada Circle  
Rancho Palos Verdes, CA 90275

B121-1

From: **George Kivett** <[gkivett@sbcglobal.net](mailto:gkivett@sbcglobal.net)>  
Date: Mon, Jan 7, 2013 at 8:08 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

To Erin Strelich, Planning Assistant, Los Angeles Department of City Planning

Regarding: Ponte Vista ENV-2005-4516-EIR

Dear Mr. Strelich,

I have lived in the City of Lomita for over 30 years, just off of Western Avenue and in close proximity to the Ponte Vista development site. I am writing on behalf of my family and myself. I keep very informed of proposed development in the community as the current Executive Director for the Lomita Chamber of Commerce plus as a Past Chairman and member of the Board of Directors for the regional South Bay Association of Chambers of Commerce. For numerous reasons my family and I have been supporters of the Ponte Vista development for a number of years.

The project has been through several ownership and design changes and this new Ponte Vista is a well thought plan which has taken into account the huge amount of feedback which has been received from the community. The project is in San Pedro but it is located closer to Lomita than it is to most other communities. When completed it will transform an old eyesore to a beautiful property, just outside the Southern edge of the City of Lomita, with landscaped open space and fantastic architectural detail.

I understand from meeting with the design team that all the traffic impacts of the project can be fully mitigated with traffic improvements in the area. That's great for the surrounding communities and for the future residents of Ponte Vista. It will also be nice to have a much needed road to Mary Star High School.

Ponte Vista will bring housing that many in our region need and want. In my family I have senior parents who are considering moving from their two story home and would love to have a new single level flat with a view to move into. Also the project would be great for my son who hopefully could buy one of condos and be able to live close to the rest of his family. As a real estate broker, I am familiar with the available housing in our region and the Ponte Vista development will solve the housing issues for many individuals and families in our area.

My personal preference is the Ponte Vista plan with 1135 units because it will allow for more single level condos which is the preference for many seniors and those who need it's easier access. At this time I can support either the 1135 units or 830 units because either plan would be a smart decision and the benefits to our region will be many.

Most sincerely yours,

B122-1

**George Kivett**, CIPS, CRIA, CRS, GRI, TRC

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***Professional certifications include:***

CIPS: Certified International Property Specialist

CRIA: Certified Realty Investment Associate

CRS: Certified Residential Specialist

GRI: Graduate Realtor's Institute

TRC: Trans-National Referral Certification

***Your most important assets deserve the best!***

# From the Desk of Anthony Misetich

January 6, 2013

To: Erin Strellich  
Planning Assistant,  
Los Angeles Department of City Planning

Re: Ponte Vista ENV-2005-4516-EIR

Dear Ms. Strellich,

I am an elected official from the city of Rancho Palos Verdes, but I am writing this as an individual. Please be advised that many of the residents that I have spoken with during my three years on the Rancho Palos Verdes City Council are in favor of the lower density plan at San Pedro's Ponte Vista housing development. To be specific, that would be a project plan that allows no more than 830 homes.

There are two main reasons why the community has concerns about this project-primarily density and traffic. Members of our past city councils have gone on record in favor of a low density project for Ponte Vista. The city of Rancho Palos Verdes and the city of Los Angeles are also working on concepts for a revitalization project on Western Ave and a higher density housing project would severely impact the success of that endeavor.

B123-1

In addition to making my views known to you through this letter, I also plan to bring forth a resolution to my city council in the near future that would ask the city of Rancho Palos Verdes adopt an official position that favors a lower density for Ponte Vista.

Like our residents I would like to see a nice housing development at Ponte Vista, but are wary if the project brings a tremendous traffic burden to Western Ave and the surrounding community.

Sincerely,



Anthony Misetich  
Resident of Rancho Palos Verdes  
(Councilman for the City of Rancho Palos Verdes)

From: **Marcia Paul** <[mpaul@westerncombustion.com](mailto:mpaul@westerncombustion.com)>  
Date: Mon, Jan 7, 2013 at 10:20 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

I support R-1 zoning on the Ponte Vista project and still oppose this project in Alternatives A and C. Thank you for considering my position.

B124-1

*Marcia Paul*

1717 Mermaid Dr.

San Pedro, CA 90732

Phone: [310-245-9228](tel:310-245-9228)

Fax: [310-834-4795](tel:310-834-4795)

Email: [mpaul@westerncombustion.com](mailto:mpaul@westerncombustion.com)



January 7, 2013

Erin Strelch  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**R NEIGHBORHOODS R1 COMMENTS ON  
ENV-2005-4516 DRAFT EIR COMMENTS: PONTE VISTA PROJECT  
26900 S. WESTERN AVE, SAN PEDRO**

Thank you for the opportunity to respond to the Draft EIR for the proposed Ponte Vista project.

We represent approximately 15,000 residents and many homeowner groups who believe a single family home development should be constructed at Ponte Vista. Our proposed project is included in our comments., that were adopted by our steering committee on January 2, 2013.

First, like others, we are frustrated and discouraged by the denial of a 90 day review period. We do not appreciate that the 60 day review period was over the Thanksgiving, Hanukkah, Christmas, and New Year holiday season. This was also not fair to the community at large on a project that everyone in San Pedro, Harbor City and Wilmington regards as a controversial project. The DEIR does little to allay our concerns because the proposed project complies with almost none of the guidelines and plans that it says it does.

The proposed project and its smaller alternative do not appear to be a good fit for the community. There are problems with the underlying assumptions and conclusions in the DEIR, mainly relating to traffic, social services, utilities and service systems. Because the analysis is built on faulty assumptions, it is in effect a "house of cards," and all conclusions based on the analysis are also faulty. We also are concerned with the lack of amenities provided on site, and the lack of any attempt to address the substantial environmental impacts through project design.

Among the fundamental deficiencies in the DEIR are the following:

- o Contrary to what is presented in the DEIR, the rezoning request will impair the orderly implementation of Regional Plans, City's General Plan, and two Community Plans. Additionally it fails to evaluate Public health and Social Impacts and conformance with the ten Urban Design Principles and the Walkability Checklist.

B125-1

B125-2

B125-3

- The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single-family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area. B125-4
- The proposed project is not a good fit for the location. The gated community and mix of housing types are not appropriate, it is not in a transit-oriented area, and its development would not improve the local jobs housing balance. B125-5
- Alternatives B, C, and D ignore the present zoning which includes 15 acres of open space. This is an especially egregious oversight in alternate B because it claims to be a “no project” alternative, i.e. buildable as a matter of right. In fact, units cannot be built on that portion of the property zoned as open space. B125-6
- The traffic analysis uses incorrect assumptions about V/C ratios and traffic generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, that is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space. B125-7
- The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent. B125-8
- The analyses and proposed mitigations for Greenhouse Gas Emissions, Hazardous Materials, Public Services, and Utilities and Service Systems are inadequate and flawed. They must be revised. B125-9
- The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. We suggest a project alternative that includes access to Mary Star, true single-family homes rather than a PUD, with work centers, commercial space, a public park that complies with the City Recreation Plan, and a library extension to meet State Guidelines for library space. B125-10

Our specific comments are attached hereto. Thank you for this opportunity to submit our comments and concerns.

Nancy Castiglione,  
For R Neighborhoods R!

CC: Councilman Joe Buscaino  
Olive Reed, President, Harbor City Neighborhood Council  
Cecelia Moreno, President, Wilmington Neighborhood Council  
Linda Alexander, President, Central San Pedro Neighborhood Council  
June Smith, President, Coastal San Pedro Neighborhood Council  
Ponte Vista Development Team

**R NEIGHBORHOODS R1**

**PONTE VISTA DEIR COMMENTS**

**An additional alternative should be studied.**

CEQA requires the consideration of a reasonable number of alternatives and that the alternatives address the significant impacts determined as a result of the environmental analysis.

The DEIR really suggest only two alternatives, one for 1135 units and the other for 830 units. There are two purported additional alternatives, one being the mandatory “no project” alternative and the other a variation of the “no project” alternative, i.e. a single family alternative it claims it can build as a matter of right.

All three of the build options identify significant environmental impacts, particularly traffic, and all three ignore the 15 acre Open Space zoning that exists on the property. All three make no attempt to mitigate traffic impacts through on-site improvements such as changes in design and providing amenities.

For those reasons, and others detailed in following pages, we suggest an additional alternative be studied that has the following characteristics.

1. Increase the number of units from the present 245 to 291 single family units on R-1 zoning.
2. Retain the 15 acre open space zoning and develop as a public park, to meet City guidelines for park space and to address recreation oriented traffic.
3. Provide public street access to Mary Star High School and construct an open project with public streets throughout the project.
4. To reduce work trip oriented traffic, provide as part of each housing unit, and also as an amenity in the project, work centers that will appeal to work-from-home residents. On-site work centers could include tele-conferencing capabilities for example, and meeting rooms. Work centers could also be suitable for after-school study centers and similar uses, and for a branch library.
5. Include some on-site convenience shop[s], to lessen car trips for occasional small item purchases, and a coffee shop for local convenience.

**Reasons to support the additional alternative**

1. The surrounding area includes single family homes. Other than the apartments immediately to the south of the project site and the Gardens, the

B125-11

B125-12

B125-13

surrounding areas are all single family homes. It is incorrect to say that the proposed 1135 or 830 unit developments conform to he surrounding area.

B125-13  
(Cont)

2. No single family homes have been built in San Pedro for thirty years. They are the housing of need in San Pedro.

B125-14

3. San Pedro generally, its political and community leadership, and the Community Plan Update, all recognize the need to renovate downtown San Pedro. A large number of condo units have been built in downtown San Pedro and indeed, immediately south of the project site, that remain unsold and are now being leased. It is a mistake to construct even more such units that will compete with the redevelopment of downtown and undermine its resurgence.

B125-15

4. The DEIR does not address the environmental impacts of additional units that could be built by parcel developers as a matter of right through SB1818 density bonuses. The owner, who openly says it will sell the parcels rather than develop them itself, claims it can eliminate the possibility of density bonuses, but nothing tit has said so far is convincing. However, SB1818 does not apply to single-family developments. An R1 development would avoid the possibility of unevaluated environmental consequences.

B125-16

5. All three development proposals ignore the Open Space zoning that applies to 15 acres of the property. They say it is a “cartographic error” but in life we don’t get to ignore zoning maps simply because we don’t like them. Further, City and State guidelines provide that recreation and park space should be provided to accommodate additional residents in an area. On-site recreation facilities would also lessen the traffic impacts of the project.

B125-17

6. Single family developments generate an average of 9.57 trip-ends per day. In a typical household that would mean four per day for work related driving in a household with two workers. A development emphasizing work-at-home facilities would appeal to families that could do at least part of their work at home, or in the project site itself. The failure to even consider these amenities in design of the project is a deficiency.

B125-18

7. There are many errors in the way traffic impacts have been computed, but it is clear that a 291 unit development would have lower impacts than a 1135, 830 or 385 unit development.

B125-19

**A 291 unit SFR development is economically feasible.**

Our recommended unit count is a pro-rata number based on the Alternate B 385 unit proposal but taking into account that 15 acres are zoned Open Space.

B125-20

The owner has said that building single-family houses would mean “\$1,000,000 dollar homes” but provided no support for the assertion. We investigated the claim.

First, we assumed the \$120,000,000 cost of the land even though it was that high due to the bid contest and because the developer was counting on City acquiescence in a zone change allowing 2230 units. Everyone knows, including the bank that owns it now, that it is not worth nearly that much. Nevertheless we have used that figure in computing the cost.

Next, we consulted the California Board of Equalization “Building Construction Handbook”, 2010, a detailed compilation of building costs throughout the state. The Handbook determines construction costs **including profit** for more than ten different grades of construction quality, certain other characteristics, and provides an adjustment for location by county. For the 216 page version of the 2010 document, see <http://www.boe.ca.gov/proptaxes/pdf/ah531.pdf>.

For purposes of computation we analyzed the single family unattached houses in the Taper area, Mount Shasta area, and around Dodson Middle School. They run from 1350 sf to 2200 s.f. with an average of 1800 sf. We use a larger size, 2000 s.f. even though it would cost more to build than an 1800 s.f. house.

Next, we used a D8 construction type with a cost adjustment for Los Angeles County, of \$136.52 psf. The description of the D8 modern construction type along with a sampler of houses built to that specification are inserted as the following three pages. Please note that the characteristics of a D8 level home are quite a bit above the level of the surrounding homes.

The computation is as follows:  $\$124.11 \times 1.10 \times 2000 \text{ sf} \times 291 \text{ houses} + \$120,000,000 \text{ land cost} = \$199,455,222 \text{ total cost}$ . Divided by 291 homes, cost per home including profit:

**\$685,413.**

B125-20  
(Cont)

**SINGLE-FAMILY RESIDENTIAL  
MODERN - POST 1990  
D-8 QUALITY**



**SINGLE-FAMILY RESIDENTIAL  
BUILDING SPECIFICATIONS  
"D" CONSTRUCTION**

POST 1990	D-8 QUALITY	MODERN
<b>Foundation</b> Reinforced concrete		
<b>Floor Structure</b> Standard wood frame or slab on grade reinforced concrete, vapor barrier, base 4" thick		
<b>Walls and Exterior</b> Framing: Standard wood or steel frame Sheathing: Line wire and paper, plywood, or particle board Cover: Good wood siding, masonry, or stucco Windows: Vinyl framed wood or aluminum; divided light; slide or double hung, double glaze Front Doors: Single or double, good quality decorative wood or metal; glass trim; side glass panels		
<b>Roof</b> Framing: Standard wood or steel frame Cover: Heavy wood shake, concrete shake, tile, or high definition composition roof Overhang: 0" to 24", ceiled or unceiled Gutters: Good quality at all eaves		
<b>Floor Finishes</b> Terrazzo, mission, or quarry tile in entry; good hardwood, carpet, vinyl, slate, or quarry tile throughout		
<b>Interior Finish</b> Drywall with good texture and paint; custom decorative woodwork and molding; rounded corners; some good wallpaper, vinyl wall cover, or veneer paneling Ceilings: Standard 9' to 11', vaulted, crown molding, coffered, or arched; good quality fans		
<b>Interior Detail</b> Interior Doors: Good quality wood Trim: Good quality wood Decorative plant shelves and art niches Closets: Good wood and mirrored doors; some walk-ins		
<b>Bath Detail</b> Number: 2 1/2 to 3 Floors: Good quality ceramic tile or vinyl tile Walls: Drywall and enamel; good wallpaper and ceramic tile Shower & Tub: Good acrylic or porcelain; good ceramic tile trim, with glass doors; glass block Twin basin vanities and compartmentalized bath		
<b>Kitchen</b> Base Cabinet: Good hardwood veneer Wall Cases: Good hardwood veneer; under cabinet lighting Drain Board: Good ceramic tile, cultured marble, granite, or Corian Island cabinets with fixtures		
<b>Plumbing</b> Galvanized, plastic, or copper pipe; 10 good fixtures; washer outlet; two water heaters		
<b>Special Features</b> Multiple sliding glass or French doors; good quality built-in double oven, range, dishwasher, garbage disposer, range hood and fan, microwave, compactor, and wet bar; utility room with laundry sink; pre-wired for security; walk-in pantry; hot water recirculator; fireplace		
<b>Electrical</b> Cable wiring; good quality fixtures; bedroom ceiling fixtures; recessed lighting		



**SINGLE-FAMILY RESIDENTIAL  
MODERN TYPE  
SQUARE FOOT AREA COST TABLES**

**"D" CONSTRUCTION - SHAPE B**

Class	700	800	900	1000	1100	1200	1300	1400	1500	1600	1700
D-5	77.49	74.26	71.47	69.30	67.41	65.83	64.54	63.30	62.24	61.32	60.51
D-5.5	85.22	81.62	78.64	76.27	74.12	72.35	71.01	69.62	68.51	67.50	66.60
D-6	98.18	94.12	90.55	87.86	85.45	83.39	81.84	80.29	79.02	77.80	76.73
D-6.5	109.07	104.50	100.51	97.53	94.86	92.61	90.83	89.04	87.70	86.34	85.23
D-7	121.05	115.97	111.65	108.27	105.34	102.86	100.91	98.89	97.26	95.88	94.65
D-7.5	140.45	134.63	129.57	125.70	122.31	119.35	117.13	114.77	113.02	111.24	109.80
D-8	164.28	157.41	151.61	147.00	142.99	139.64	136.94	134.26	132.13	130.15	128.39
D-8.5	188.26	180.41	173.73	168.49	163.82	160.01	156.94	153.84	151.36	149.15	147.15
D-9	256.51	245.78	236.67	229.55	223.21	218.03	213.80	209.57	206.22	203.18	200.47
D-9.5	367.08	351.62	338.72	328.40	319.39	311.94	305.85	299.88	295.11	290.75	286.84
D-10	422.12	404.37	389.50	377.68	367.31	358.80	351.77	344.84	339.37	334.37	329.81

**"D" CONSTRUCTION - SHAPE B**

Class	1800	2000	2200	2400	2600	2800	3000	3200	3400	3600	4000
D-5	59.74	58.48	57.53	56.66	55.88	55.21	54.68	54.14	53.70	53.32	52.73
D-5.5	65.70	64.36	63.30	62.24	61.42	60.77	60.12	59.59	59.09	58.67	57.99
D-6	75.78	74.12	72.93	71.81	70.88	70.02	69.27	68.63	68.07	67.56	66.85
D-6.5	84.12	82.37	81.01	79.71	78.64	77.76	76.91	76.21	75.59	74.99	74.23
D-7	93.40	91.36	89.94	88.50	87.28	86.27	85.43	84.56	83.95	83.33	82.43
D-7.5	108.38	106.06	104.37	102.78	101.32	100.16	99.15	98.16	97.37	96.67	95.61
D-8	126.83	124.11	122.09	120.21	118.51	117.12	116.02	114.87	113.92	113.08	111.87
D-8.5	145.25	142.22	139.92	137.76	135.86	134.26	132.92	131.62	130.55	129.55	128.20
D-9	197.92	193.77	190.69	187.66	185.06	182.88	181.06	179.32	177.86	176.48	174.66
D-9.5	283.25	277.19	272.71	268.59	264.86	261.66	259.14	256.56	254.51	252.55	249.97
D-10	325.72	318.78	313.65	308.84	304.52	300.91	297.96	295.09	292.67	290.45	287.41

**"D" CONSTRUCTION - SHAPE B**

Class	4200	4400	4600	5000
D-6	66.26	65.72	65.27	64.61
D-6.5	73.57	72.97	72.47	71.74
D-7	81.69	81.05	80.48	79.67
D-7.5	94.74	93.99	93.32	92.40
D-8	110.88	109.99	109.22	108.13
D-8.5	127.23	125.65	124.69	123.82
D-9	173.10	171.71	170.51	168.80
D-9.5	247.70	246.84	245.12	242.66
D-10	284.83	282.54	281.66	278.85

As for our additional comments, we generally adopt the comments of Northwest San Pedro Neighborhood Council to the extent they do not conflict with our position herein. With some changes, they are as follows:

**C. PROJECT CHARACTERISTICS**

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

B125-21

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

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

B125-22

**Specific Plan Zoning**

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

B125-23

The proposed zoning is vague. For example, the proposed single-family units are not the traditional single-family homes that one finds in an R-1 zone. Rather they are essentially the type of housing found in areas zoned RD 1.5 and higher.

The apartment buildings need to have a specific zoning that is applicable to the actual size and density of the proposed development. A Medium density by City of LA codes extends all the way to R-4 zoning which is comparable to the density

B125-24

on Fitness Drive, the 6-acre parcel between the Commercial Shopping Center and the Ponte Vista Property. Figure II-10, Parcel 7 should be zoned specifically for their proposed density, not the medium density. The apartments should be capped at R-3 or lower to provide for an appropriate transition from the development on Fitness Drive to the lower density units directly to the north.

B125-24  
(Cont)

**Private Roads**

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

B125-25

**Open Space**

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

B125-26

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

B125-27

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

B125-28

**Building Heights**

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

B125-29

**D. CONSTRUCTION CHARACTERISTICS**

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

B125-30

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

B125-31

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

B125-32

**E. PROJECT OBJECTIVES**

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

B125-33

**SECTION III. ENVIRONMENTAL SETTING**

**B. OVERVIEW OF ENVIRONMENTAL SETTING**

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

B125-34

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

B125-35

Southern California International Gateway (SCIG)

APL Terminal expansion

- Ports O'Call Redevelopment
- Cabrillo Marina Phase II
- USS Iowa
- Los Angeles County Sanitation Districts Clearwater Outfall Project
- Rolling Hills Prep School build out from 250 students to 1,000 students
- VOA Navy Village
- Pacific LA Marine Terminal
- Harbor Highlands Development (under construction)
- City Dock 1
- Port Master Plan update
- Marymount College Expansion on Palos Verdes Drive North
- San Pedro Community Plan update

B125-35  
(Cont)

**G. GREENHOUSE GAS EMISSIONS**

**Background**

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

The City of Los Angeles has embraced the effort. It adopted “Green L.A.: An Action Plan to Lead the Nation in Fighting Global Warning” in May 2007, in which it proclaims that by 2030 it will reduce GHGs from city operations 35 percent below 1990 levels.

Three gases are felt to pose the greatest threat: carbon dioxide, methane and nitrous oxide.<sup>1</sup> The primary cause of GHG pollution is combustion of fossil fuels.<sup>2</sup> In California, fossil fuel use is closely related to motor vehicle use.

B125-36

<sup>1</sup> California Technical Advisory: CEQA and Climate Change, June 19, 2008 – hereinafter “Technical Advisory”

<sup>2</sup> Technical Advisory, p. 2

**Emissions**

According to the DEIR, this project will not reduce GHG pollution to 1990 levels. Indeed, it will not decrease GHGs at all. To the contrary, it will increase them. The site currently generates no GHGs (p. IV G-4). According to the developer's projections, the proposed project will generate 15,620.55 metric tons of GHGs each year.<sup>3</sup> That is 15,620.55 more metric tons or 17,222 more American "short" tons of pollutants every year for the foreseeable future than are generated at the present, 172,220 short tons over 10 years, 344,440 short tons over 20 years, etc.

This single fact should overshadow all others for anyone considering the project's impact on this insidious form of pollution.

B125-36  
(Cont)

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

B125-37

**Proposed "Reductions"**

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

B125-38

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

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<sup>3</sup> It is curious that the DEIR uses the metric system at this point. A metric ton weighs considerably more than the "short ton" most Americans are used to working with – 2,205 pounds instead of 2,000. Accordingly, 15,620.55 metric tons translates to 17,222 tons of polluting gases.

### **Emissions from Autos**

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

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

B125-39

What is more, the project is not near any major employment center.<sup>4</sup> Nor is that likely to change. The recently drafted San Pedro Community Plan does not anticipate adding any major commercial centers in the area during the next 20 years. In short, residents of the proposed project are likely to have to commute considerable distances by car to work.

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

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

### **Responsibility**

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

B125-40

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<sup>4</sup> Despite the fact that the Project is located near the Port of Los Angeles, many of the Port jobs are a significant distance from this site. Furthermore, the San Pedro Community Plan Area has a huge deficit in jobs with a job housing ration of 0.44

need take responsibility for them. That way of thinking must stop now or there is no chance of dealing with these pollutants. Only by forcing each project to confront and address the issue properly will there be any hope of reducing GHGs and the threat they pose.

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

See also our comments under Traffic and Transportation.

**H. HAZARDOUS MATERIALS**

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

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

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

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

With regard to the Rancho LPG facility, the DEIR notes that “to a much lesser extent there may be some quantifiable risk of upset from other activities such as product delivery by rail or truck...Based on the worst-case RMP scenario and with the more likely releases having a much smaller radius impact than 0.5 miles, there would be no impact to the project site.” **This analysis under estimates the potential impact to the Project Site, endangering the safety of future residents, with no proposed mitigations.** The US DOT report of butane incidents by Means of Transportation found that there were 751 rail incidents and 13154 truck incidents in 2003 alone. This is far from an insignificant risk. In many respects, it would be far more accurate to say that “it is just a matter of time” before a significant incident occurs.



B125-40  
(Cont)

B125-41

B125-42



In addition, Tosco Refining Company's Risk Management Plan for what is now the Phillips 66 refinery contains a worst-case scenario (Attachment A) for a butane incident with a 2.3-mile impact, way beyond the Ponte Vista site. An additional proof that the risk is far from insignificant is shown in the linked video showing a 60,000-pound LPG rail tank car being hurled three quarters of a mile once it caught fire.<sup>5</sup>

B125-43

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

B125-44

**Evacuation Routes**

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

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

B125-45

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

Further, asserting that Western is "too far to the West" for an evacuation route ignores the fact that San Pedro has only 3 north/south evacuation routes (Gaffey Street, the 110 Freeway (adjacent to and accessed by Gaffey and Harbor Blvd.),

B125-46

<sup>5</sup> See [WWW.YOUTUBE.COM/WATCH?V=XF3WKTWHPIU](http://WWW.YOUTUBE.COM/WATCH?V=XF3WKTWHPIU)

and Western Avenue. If any of the 2 non-Western-Avenue routes is blocked (note that a portion of North Gaffey Street and a portion of Harbor Blvd. are in liquefaction zones), Western Avenue may be the only available evacuation route. San Pedro with the Port operations, storage of hazardous materials, and location on earthquake, liquefaction, and methane zones, is for more apt to need to evacuate that any other location in the City of Los Angeles.

B125-46  
(Cont)

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

B125-47

The “entire city of Rancho Palos Verdes, excluding the portion of the City located east of Western Avenue (approximately 98 acres) is classified as a VHFHSZ [Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection]”<sup>6</sup> and in 2009 alone 2000 residents of RPV were forced to evacuate their homes because of wildfires. For the residents of RPV on the west side of Western, Western Avenue is the only evacuation route available to them. It is not credible to assert that Western Avenue north of Summerland would not be an evacuation route for RPV residents.

B125-48

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

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

B125-49

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

<sup>6</sup> Safety Element of the City of RPV General Plan, adopted June 2010

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 Los Angeles. This would particularly apply to an isolated area like San Pedro, surrounded on three sides by water and with very limited egress routes. In a disaster, San Pedro could quickly face serious challenges.

B125-50

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

B125-51

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

## J. LAND USE & PLANNING

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

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

B125-52

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

## REGIONAL PLANS

### Regional Transportation Plan

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

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

B125-53

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

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

B125-54

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

The Growth Vision is driven by four principles:

1. **Mobility** - Getting where we want to go
2. **Livability** - Creating positive communities
3. **Prosperity** - Long-term health for the region
4. **Sustainability** - Promoting efficient use of natural resources

B125-55

**Mobility:** The Mobility principle encourages mutually supportive transportation investments and land use decisions. A key strategy is to design complete streets that promote walking, biking, and transit use. There is no discussion at all how the proposed subdivision supports this principle.

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

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

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

**The proposed gated subdivision utterly fails to meet all four principles of the Compass Plan.** The Compass Plan website<sup>7</sup> features many proposed and built development as best practices. None are gated subdivisions.

**Los Angeles General Plan**

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

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

<sup>7</sup> www.compassblueprint.org



B125-55  
(Cont)

B125-56

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

B125-56  
(Cont)

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

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

B125-57

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

B125-58

**San Pedro Community Plan (SPCP)**

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

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

B125-59

- Designed to provide a mix of housing types for a range of incomes;
- Compatible with a Low Medium density designation;

<sup>8</sup> 2009 Department of City Planning Recommendation Report CPC 200608043-GPA-ZA-SP-DA, Ponte Vista Specific Plan, page F-2.

- Open and accessible to the community, and not developed as a gated community; and
- Developed with accessible public open space, community facilities and other public amenities.”

B125-59 (Cont)

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

B125-60

### Housing Types

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

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

B125-61

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

### Open and Accessible to the Community:

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

B125-62

**Open Space and Public Amenities:**

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

B125-63

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

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

B125-64

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

**Additional Plan Considerations**

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

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

B125-65

The proposed project does not address any of these.

While not specific to the Ponte Vista site, the SPCP states the “The need for affordable senior housing and assisted living facilities is a key concern due to

B125-66

<sup>9</sup> Draft San Pedro Community Plan, August 2012, page 37



demographic and economic trends and projections. In San Pedro, such facilities would increase the opportunities for those ‘empty nest seniors’ looking to downsize from large single-family homes while remaining within the community and the reach of supportive social, cultural and family networks.”<sup>10</sup> **The lack of any senior housing in this project would be a significant missed opportunity.**

B125-66  
(Cont)

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

**The proposed project does not meet the fundamental premises of the WHCCP.** The first premise is limiting residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Although the six acres immediately adjacent to the South is multi-family, this is an anomaly. This property was zoned commercial with the expectation that it would be used in such a manner. Unfortunately, the same code allowed the multi-family structures to be erected in a manner that is not compatible with the surrounding community. The surrounding neighborhoods are single family R-1, with the exception of the Gardens that is 13.5 net dwelling units per acre. In fact, according to a recent study, 80% of the land along the Western Avenue corridor (Summerland to Palos Verdes Drive North) is dedicated to single-family residential lots.<sup>11</sup>

B125-67

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

B125-68

The second and third premises are

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

B125-69

The Annual Report on Growth and Infrastructure has not been done. The DEIR (I-103) states that the “Projects direct plus induced growth” represents about

<sup>10</sup> Draft San Pedro Community Plan, August 2012, page 37.

<sup>11</sup> Western Avenue Corridor Vision, Preliminary Analysis and Ideas, November 14, 2012

91% of the growth forecasted within the WHCCP area, thus this single project will use virtually all of the planned for growth. Considering that there have been other residential developments in the 14 years since the WHCCP was developed, **building controls should be put into place until such a study is conducted.**

B125-69  
(Cont)

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

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

B125-70

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

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

B125-71

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

B125-72

**The proposed project does not meet Objective 8-2 and policy 8-2.1 of the WHCCP** which seeks “to increase the community’s and the Police Department’s ability to minimize crime and provide security for all residents, buildings, sites, and open spaces” and to “support and encourage community-based crime

B125-73

<sup>12</sup> Department of City Planning Recommendation Report CPC 200608043-GPA-ZA-SP-DA, Ponte Vista Specific Plan, page F-3.

prevention efforts (such as Neighborhood Watch), through regular interaction and coordination with existing community-based policing, foot and bicycle patrols, watch programs, and regular communication with neighborhood and civic organizations.”

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

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

**LA MUNICIPAL ZONING CODE**

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

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

No support whatever is provided for this claim. However, using the January 2010 “Residential Building Costs” published by the State of California Board of

<sup>13</sup> Blakely, E.J., and M.G. Snyder. (1998). "Separate places: Crime and security in gated communities." In: M. Felson and R.B. Peiser (eds.), Reducing crime through real estate development and management, pp. 53-70. Washington, D.C.: Urban Land Institute.



B125-73 (Cont)

B125-74

B125-75

Equalization<sup>14</sup> the cost of building good quality single family houses is far less than claimed by the applicant. The 216-page publication provides building cost data for a variety of residential building types, sizes and quality. The costs include entrepreneurial profit and adjustments for location where the units are to be constructed. They do not include discounts for multiple units being constructed at the same time however, which would make the cost even lower.

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

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

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

**URBAN DESIGN PRINCIPLES**

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

The ten Urban Design Principles are:

- 1. Develop inviting and accessible transit areas;
- 2. Reinforce walkability, bikeability, and wellbeing;
- 3. Nurture neighborhood character;
- 4. Bridge the past and future;
- 5. Produce great green streets;

<sup>14</sup> <http://www.boe.ca.gov/proptaxes/pdf/ah531.pdf>

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

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



B125-75 (Cont)

B125-76

B125-77

- 6. Generate public open space;
- 7. Stimulate sustainability and innovation;
- 8. Improve equity and opportunity for all;
- 9. Emphasize early implementation, simple processes and maintainable long-term solutions; and
- 10. Ensure connections.

B125-77  
(Cont)

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

**WALKABILITY CHECKLIST**

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

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

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

B125-78

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

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

**L. POPULATION AND HOUSING**

**PLAN FRAMEWORK ELEMENT**

**Objectives**

The DEIR indicates that one of the relevant objectives is:

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

B125-79

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

**Housing**

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

B125-80

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

We question the SCAG growth estimates and hence the need for additional housing since the 2010 census actual population numbers are well below SCAG 2005 estimates and projections. The DEIR (IV.L-9) discusses the SCAG Regional Housing Needs Assessment that was developed for the period January 1, 2006 – June 30, 2014. This is an old document. The new version of this document should be used. Furthermore, this old version has been shown to have grossly overestimated the projected growth for Los Angeles in general and

B125-81



San Pedro in particular. For example, the SCAG 2005 population estimate for San Pedro was 82,112; however, according to the 2010 census there are only 76,651 persons in San Pedro, 5,461 fewer. If the 2.5% growth forecast from 2010 through 2017 were applied, this would add 1916 to the population of San Pedro by 2017 still significantly below the 2005 SCAG forecast upon which the housing needs were developed. **Consequently it is in error to conclude that the project will not induce substantial population growth in an area by proposing new homes.**

B125-81  
(Cont)

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

B125-82

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

**M. PUBLIC SERVICES**

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

B125-83

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

This project is being developed in an existing area that currently requires a comparatively limited number of calls for services, therefore, any increase should be considered significant. The project area is currently zoned for R-1 and open space, which would be the ideal 'fit' for the existing neighborhood community and have a minimum negative impact. This describes Alternate B, which has less of an environmental impact than Alternate C, the preferred Alternate.

B125-84

Admittedly determining the anticipated impact of this project on the existing community is purely a speculative process generated by infinite unknowns. Calls for service may result from intentional and accidental human acts and acts of nature, some minor and others more serious or even catastrophic in nature, but all significant to those impacted.

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

B125-85

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

B125-86

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

B125-87

## 1. FIRE PROTECTION

### **The analysis of fire protection and proposed mitigations is inadequate.**

The DEIR states that all *public* street fire lane cul-de-sacs shall have the curbs painted red or be posted “No Parking Any Time” prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.

B125-88



The streets in the project are proposed to be **private** streets, so where will the “public” street fire lanes be? This contradiction should be fixed. Where will the guests park? Please state how the no-parking zones and red curbs will be enforced. What if cars are illegally parked in red zones and in private lanes making it impossible for emergency vehicles to get through?

B125-88  
(Cont)

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

The proposed mitigation states sprinklers will be installed throughout all structures but does not specify if fire sprinklers will be installed inside every residential unit. “The US Fire Administration supports the recently adopted changes to the International Residential code that require residential fire sprinklers in all new residential construction. It is the position of the U.S. Fire Administration that all Americans should be protected from death, injury, and property loss resulting from fire in their residence. All homes should be equipped with both smoke alarms and residential fire sprinklers.”<sup>17</sup> Please clarify the DEIR and address implications if sprinklers are not installed in every residential unit.

B125-89

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

B125-90

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

B125-91

<sup>17</sup> Source: US Fire Administration, June 2009

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

B125-91  
(Cont)

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

B125-92

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

B125-93

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

**2. POLICE PROTECTION**

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

B125-94

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

B125-95

**3. SCHOOLS**

There are several problems with the methodology used for the school impact analysis.

B125-96

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

B125-96  
(Cont)

B125-97

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

B125-98

	Current Students	Ponte Vista <sup>20</sup>	Harbor Highlands	Total	Capacity	Difference
Taper	629	231	27	887	804	83
Dodson	1863	112	13	1988	1892	96
Narbonne	3350	113	0 <sup>21</sup>	3463	3531	(68)

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

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

B125-99

<sup>18</sup> San Pedro Community Plan DEIR p 4.12-31

<sup>19</sup> The Current Students and School Capacity figures were obtained from Bruce Takeguma, Director, LAUSD, School Management Services (213) 241-3344

<sup>20</sup> For Ponte Vista and Harbor Highlands the student generation rate from the San Pedro Community Plan was used.

<sup>21</sup> Although Harbor Highlands will generate 13 students, they would go to San Pedro High School, not Narbonne and therefore are not counted here.

resulting in serious traffic tie-ups at both ends of the school day, as well as many unique trips in and out of any development. This is particularly true in San Pedro where a variety of relatives are available to pick up and deliver children to and from school. Mitigations should be proposed to encourage children to walk to Taper and Dodson.

B125-99  
(Cont)

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

B125-100

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

B125-101

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

**4. PARKS and RECREATION**

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

B125-102

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

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

B125-103

<sup>22</sup> See Los Angeles public Recreation Plan page 2 for a complete list.

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

B125-103  
(Cont)

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

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

B125-104

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

**5. LIBRARIES**

The DEIR is not accurate in its assertion that the current San Pedro library, at 20,000 square feet, is adequate size for the population served, and should be adequate to meet the needs of the increased population added by the development. This claim is in conflict with the DEIR for the San Pedro Community Plan that states “The available public library services in the San Pedro CPA, in terms of library space and permanent volume collection, are *currently inadequate* to meet existing demands from the community’s residents based on state library standards.... of 0.5 square feet per person.”<sup>23</sup> The State of California Library standard requires 0.5 sq ft of library space per resident. For the existing population of 76,651 residents (2010 census data), library space available should 38,325 square feet, nearly double the existing space. Since the project would add nearly 3,000 additional residents, and it would require at least 1500 square feet of additional space.

B125-105

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

B125-106

<sup>23</sup> San Pedro Community Plan DEIR p 4.12-40

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

B125-106  
(Cont)

The Ponte Vista project has an opportunity to mitigate this defect by incorporating a public library into the project. The library should be at least 20,000 square feet to meet State requirements. The San Pedro Community Plan recommends integrating libraries into multi-use buildings. For reference consider the Milwaukee Public Library is moving ahead with development of two multi-use buildings including libraries: one is a proposed 16,000 square foot library topped with 92 apartments (plus parking).<sup>24</sup>

B125-107

The San Pedro Community Plan also suggests that on-line services and virtual libraries with computer workstations that provide access to the library’s on-line catalog, extensive information databases, multimedia software for students, and free Internet searching for the public may lessen the adverse impacts resulting from a mismatch between available physical library space and resources and the community’s need for library facilities.”<sup>25</sup>

**N. TRAFFIC**

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

B125-108

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

B125-109

<sup>24</sup>See <http://urbanmilwaukee.com/2012/02/28/east-library-redevelopment-advances-at-city-plan-commission-renderings/>

<sup>25</sup> San Pedro Community Plan DEIR p 4.12-40

**We have concerns about how the variables were calculated and the accuracy of the LOS results obtained, about the way in which mitigation is determined, and the failure to address how to design the amenities on the site in order to reduce traffic generation. This should be corrected.**

B125-109  
(Cont)

**1. IMPROPER CALCULATION OF THE VARIABLES**

**Improper Use of ITE Traffic Generation Data**

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

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

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

B125-110

Further, each trip generation graph in the ITE Manual includes a wide range of actual trip generation numbers. To select the mid-point is difficult to justify.<sup>26</sup> Had the developer and the City used more appropriate data points within each classification, as they are permitted to do, and admonished to do by ITE itself, the trip-end volume would be 10,862 instead of 7,462. AM peak hour volume would increase from 571 to 851 and PM peak would increase from 669 to 1146. Using these calculations, and using normalized traffic counts, would greatly increase the V/C ratios and lower the LOS ratings at many more intersections among the 56 tested intersections.

B125-111

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

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

B125-112

<sup>26</sup> We suggest that perhaps the traffic problems in other areas of the City and increasingly in San Pedro, Wilmington and Harbor City, can be attributed to this practice of using mid-point calculations rather than more realistic data.

The impact is shown in the DEIR counts in 2010, which are lower than earlier counts taken by the same consultant in 2005 for the prior project, lower than the counts taken for the Target Store analysis in 2006 and lower than many of the counts for the Marymount project on Palos Verdes Drive North in 2011, after the installation of ATSAC/ATCS. For example, the V/C PM ratios for Western and PV Dr. North are

2005	1.025	[Ponte Vista I]
2006	1.078	[Target]
2010	.851	[DEIR, present project]
2011	.872	[Marymount]

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

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

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

**Failure to Include Data from Other Projects**

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

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

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<sup>27</sup> Twenty Foot Equivalent Units, a measure used to normalize cargo counts since not all containers are the same size.



B125-112  
(Cont)

B125-113



Los Angeles County Sanitation Districts Clearwater Outfall Project

Rolling Hills Prep School build out

VOA Navy Village

Pacific LA Marine Terminal

Harbor Highlands Development (under construction)

City Dock 1

Port Master Plan update

San Pedro Community Plan update

Marymount College Expansion on PV Drive North

B125-113  
(Cont)

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

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

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

B125-114

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

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

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

B125-115

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

**Max Line 3** runs from 36th Street and Pacific Ave in San Pedro to LAX Green

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

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

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

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

**2. COMMENTS CONCERNING PROPOSED TRAFFIC MITIGATIONS**

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

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

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

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

**The Projected Routing for PM Peak Hour Traffic Does Not Seem to Have a Basis**



B125-115 (Cont)

B125-116

B125-117

B125-118

We realize that predicting access routing is sometimes an art rather than a science. However, given the very long PM backups at the 110 Freeway off-ramps at Sepulveda, Pacific Coast Highway and Anaheim, coupled with the challenge of making a left turn across Western, it seems likely that in the evening, a large percentage of commuters will exit at Channel Street and proceed north on Gaffey to Channel, Capitol, or Westmont and then west to Western to the project entrances. This assumption is given further credence in that virtually every place a commuter might want to stop on their way home, be it for groceries, dry cleaning, or to pick up a child, is off of either Gaffey or that portion of Western that lies between Channel and Westmont. Further, this commuter traffic will be joined by those residents who are coming home from downtown San Pedro and the San Pedro Waterfront and from Long Beach and points south via the 47. An analysis of all of this traffic should be included.

B125-118  
(Cont)

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

A significant amount of project-generated traffic will be work related traffic. Other components will be taking kids to soccer practice, taking children to school, going to the markets and library, church, etc. Work-related traffic will be especially heavy, and for greater distances than normal, because the project is not really responding to local employment needs.<sup>28</sup> In other words, they are proposing a suburban commuter community.

B125-119

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

**OTHER CONCERNS**

**The DEIR fails to analyze the impact of increased traffic on Western from the 74 driveways and non-signalized intersections on Western between Summerland and Palos Verdes Drive North.** According to a recent study of the Western Avenue Corridor, there are 111 destinations on Western between Summerland and Capital Drive.<sup>29</sup> These grocery stores, post office, dentist offices, coffee shops, banks, etc. are accessed through the driveways. These poorly designed driveways add to the traffic flow problems. For example, the turn lane into the shopping center nearest the project can only accommodate

B125-120

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

<sup>29</sup> Western Avenue Corridor Vision Preliminary Analysis and Vision, Nov 14, 2012

about 4 cars. After that, cars begin impeding the flow of traffic on Western. This is a very unique condition and an analysis should be conducted of the impact of the traffic generated by the Ponte Vista residents using these driveways.

B125-120  
(Cont)

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

B125-121

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

B125-122

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

B125-123

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

B125-124

The DEIR failed to study the Harbor Freeway Channel Street Off-Ramp and the 47 Freeway Channel Street On-Ramp at Miraflores. The impact of increased traffic at this intersection must be studied and appropriate mitigations proposed. In addition, the full intersection including Channel and Gaffey must be re-examined. We are suspicious that the low LOS shown at that intersection was the result of southbound Gaffey traffic backed up at Miraflores and therefore not even entering the Channel and Gaffey intersection. An April 2004 baseline study, for the Port of Los Angeles found this intersection to be at an OS of E during the PM Peak Hour and the Gaffey/Miraflores intersection to be an LOS of F in the AM Peak hour and D in the PM Peak Hour.<sup>30</sup>

B125-125

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

B125-126

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

B125-127

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

B125-128

<sup>30</sup> Port of Los Angeles Baseline Transportation Study, Meyer, Mohaddes Associates. April 2004

students take public transportation. This must be added into the traffic study for that intersection.

B125-128  
(Cont)

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

B125-129

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

B125-130

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

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

B125-131

**PUBLIC TRANSPORTATION**

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

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

B125-132

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

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

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

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

B125-132  
(Cont)

**O. UTILITIES AND SERVICE SYSTEMS**

**1. WATER**

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

B125-133

The developer estimates that the 1,135-unit project will use 216 acre-feet per year of water. (p. I-135). That translates to 170 gallons per day per unit. However, that figure is far below what experience has shown constitutes actual use. The United States Environmental Protection Agency has found that the average American household uses 400 gallons per day.<sup>31</sup> In Southern California, where residents may be more sensitive about conserving fresh water, the Los Angeles Department of Water and Power (LADWP) reports that the average single-family residence consumes 359 gallons each day<sup>32</sup>

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

B125-134

The DEIR does make reference to “purple pipe” – that is, plumbing that will capture and conserve gray water – in the project’s units (p. IV O-11). As

B125-135

<sup>31</sup> “Water Sense,” an EPA Partnership Program at [www.epa.gov/WaterSense/WaterUseToday](http://www.epa.gov/WaterSense/WaterUseToday)

<sup>32</sup> Los Angeles Department of Water and Power, 2010 Urban Water Management Plan [hereinafter referred to as the “UWMP”], p. 43.

commendable as this might be, the report goes on to suggest that the infrastructure needed to collect and reuse such water is not in place. Moreover, there is no mention when, if ever, it will be.

B125-135  
(Cont)

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

B125-136

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

B125-137

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

**2. WASTEWATER**

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

B125-138

**3. ENERGY**

Solar or alternate energy such as Bloom Energy Servers should be required. Currently 39% of the City’s energy comes from coal. This is being phased out. The City’s lease for the Navajo power plant expires in 2019 and the City’s contract for a coal generated plant in Utah ends in 2027. DWP has indicated that both plants will be shut down when the leases expire. In order to replace this loss, DWP is counting on, among other things, an increase from the current 20% renewable energy and 1% energy efficiency to 33% renewable energy and 10%

B125-139

energy efficiency.<sup>33</sup> These assumptions may or may not be accurate. Increased use of renewable energy is commendable but also costly to consumers. Existing ratepayers should not have to bear the costs resulting from the increased demand created by this project.

↑  
B125-139  
(Cont)

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

□  
B125-140

**PUBLIC HEALTH IMPACTS**

Large-scale developments like Ponte Vista have the potential to cause substantial adverse effects on health of residents, either directly or indirectly. Therefore, the DEIR must discuss “health and safety problems caused by the physical changes”(CEQA Guidelines Section 15126.2). If the analysis identifies significant health impacts, the lead agency must adopt feasible mitigations. Important determinants of public health include the preservation of natural areas, air and water quality, community noise, housing and transportation patterns, access to food resources, public services, and economic well-being.

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

□  
B125-141

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

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

□  
B125-142

**SOCIAL IMPACTS**

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<sup>33</sup> LADWP Presentation on Proposed Rates 2012-2014, Mandates and Reliability

□  
B125-143  
↓



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

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

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

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

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

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

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

**PROJECT ALTERNATIVES**

The DEIR should analyze at least one additional alternative that better addresses the context of the community and environmental impacts of the project. We suggest a mixed-use project alternative that includes access to Mary Star, with true single-family homes on appropriate sized lots, rather than a PUD, work centers, commercial space, senior friendly facilities, a range of public open spaces including a 6-acre public park, and a library extension to meet State Guidelines for library space.



B125-143  
(Cont)

B125-144

Additionally, given the poor jobs housing balance, it seems remiss that none of the alternatives included a light industrial park. This is particularly true in light of the fact that the original re-use plan for this property would have resulted in significant job creation.<sup>34</sup>

B125-144

**ATTACHMENTS**

**Attachment A Tosco Worst Case Scenario**

**Attachment B Critical Facilities and Lifeline Systems in the City of Los Angeles**

**Attachment C LAUSD School Enrollments for Taper, Narbonne, and Dodson**

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<sup>34</sup> According to the Draft EIR for the San Pedro Community Plan, the jobs-housing ratio for San Pedro is 0.44 while it is 1.3 for Los Angeles as a whole.

From: **Jon Foreman** <[jon.foreman@lacity.org](mailto:jon.foreman@lacity.org)>  
Date: Tue, Nov 13, 2012 at 5:07 PM  
Subject: Fwd: Ponte Vista DEIR Request for Extension of Time  
To: Erin Strelch <[erin.strelch@lacity.org](mailto:erin.strelch@lacity.org)>  
Cc: Karen Hoo <[karen.hoo@lacity.org](mailto:karen.hoo@lacity.org)>

Hello Erin,  
Since we are in the comment phase, please include for Response to Comments.  
Jon

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

From: **diana nave** <[diananave@earthlink.net](mailto:diananave@earthlink.net)>  
Date: Sat, Nov 10, 2012 at 3:55 PM  
Subject: Ponte Vista DEIR Request for Extension of Time  
To: [lisa.webber@lacity.org](mailto:lisa.webber@lacity.org)  
Cc: [jon.foreman@lacity.org](mailto:jon.foreman@lacity.org), Alison Becker <[alison.becker@lacity.org](mailto:alison.becker@lacity.org)>

Lisa.

As I mentioned to you today, on behalf of the Northwest San Pedro Neighborhood Council, I would like to request an extension of time to respond to the DEIR for Ponte Vista. Currently the due date for comments is Jan. 9. Our Board Meeting is Jan 14. We need approximately two weeks after that time to discuss and incorporate any issues raised at that meeting. Therefore I am requesting that the time for comments be extended to at least January 28. Please note that this is less than the 90 days we originally asked for.

B126-1

Thank you for your consideration of this request

Diana Nave, President  
Northwest San Pedro Neighborhood Council

[310-831-1975](tel:310-831-1975)  
[310-930-0217](tel:310-930-0217)

--  
**Jon Foreman, Senior City Planner**  
City of Los Angeles, Department of City Planning  
200 N. Spring St., City Hall, Room 750  
Los Angeles, CA 90012  
Tel: [213-978-1387](tel:213-978-1387)  
Fax: [213-978-1343](tel:213-978-1343)  
[jon.foreman@lacity.org](mailto:jon.foreman@lacity.org)

From: **Jim Welstead** <[jimwelstead@aol.com](mailto:jimwelstead@aol.com)>  
Date: Mon, Jan 7, 2013 at 11:58 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [Councilmember.buscaino@lacity.org](mailto:Councilmember.buscaino@lacity.org)

Just a quick comment on the proposed Ponte Vista Project. First, I wish the comment period was 90 days instead of 60 days, especially since the comment period was over the holiday season. This keeps many from sending in their comments because they are busy with not just their everyday lives, but with all the holidays as well.

I believe the project must remain zoned R-1. A development of greater density does not fit the area, and will lower the quality of life for the entire community.

Traffic on Western Ave. is already overcrowded and congested.

It has been proven the the owners of the property can make a profit building an R-1 project.

The land for the project was zoned R-1 when it was purchased and should remain R-1.

Thank you for the opportunity to respond to the Draft EIR.

Jim Welstead

B127-1

From: **John Marshall** <[jdmpkm@cox.net](mailto:jdmpkm@cox.net)>  
Date: Mon, Jan 7, 2013 at 12:28 PM  
Subject: PonteVista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

PonteVista ENV-2005-4516-EIR

I support Ponte Vista "Alternate B" R-1 zoning. I cannot support any plan that would authorize the building of 800 or 1100 units (Alternates C and D) on the site as long as there is no road from the project east to Gaffey St. I also am against the building of 4 or 5 story buildings along Western Ave. Too much air and noise pollution will be caused by building C or D.

I've lived in my house on Pontevedra Dr. Since 1975. I was a member of the 1998-99 San Pedro Re-Use Committee. I know what this is all about.

B128-1

*John D. Marshall*

John D. Marshall  
27926 Pontevedra Dr.  
Rancho Palos Verdes, CA 90275

From: **R&D Herbert** <[ax027@sbcglobal.net](mailto:ax027@sbcglobal.net)>  
Date: Mon, Jan 7, 2013 at 12:52 PM  
Subject: Revised Ponte Vista Project  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Sir:

Response to Draft Environmental Impact Report No. ENV-2005-4516 EIR  
STATE CLEARINGHOUSE NO. 2010101083

After reviewing the EIR I am still of the opinion that the Ponte Viste Project should remain R-1 zoning.

I attended many meetings last time around and still find this project this project to have to great an increase in traffic on Western Avenue south of Palos Drive North.

We are right around the corner from this project and know how congested it is at the traffic hours. As it is now emergency vehicles, especially, find it very difficult to maneuver on Western at the busy traffic times.

Ruth Herbert  
26824 Via Desmonde  
Lomita, CA 90717  
[310-325-7249](tel:310-325-7249)

B129-1

January 7, 2013

City of Los Angeles  
Planning Department

Erin Strelch

RE: Ponte Vista ENV-2005-4516-EIR

I am writing this letter in support for the 1135 unit plan for Ponte Vista Housing on Western Avenue in San Pedro, California.

My parents moved to San Pedro in 1942, and my husband and I have lived in our home on 3<sup>rd</sup> Street in Pedro since 1963. We raised our family in San Pedro and plan to sell our two story home and move to a one level condo or apartment.

We believe Ponte Vista's 1135 plan is the right project for San Pedro which includes single family homes as well as townhouses, condos, and apartments suitable for senior living. We support a gated secure community with walking trails and swimming pools. It is time to improve the blighted vacant homes on Western Avenue.

I am looking forward to the Planning Commission and City Council approving the 1135 Ponte Vista project which I believe is best for Los Angeles and the Harbor Area.



Irene Mendoza

1290 West 3<sup>rd</sup> Street  
San Pedro, CA 90732

irene.mendoza11@gmail.com

B130-1

January 4, 2013

City of Los Angeles  
Planning Department

Erin Strellich:

RE: Ponte Vista ENV-2005-4516-EIR

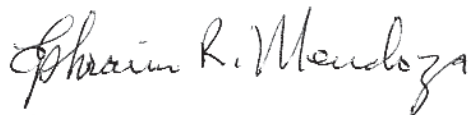
I am writing this letter in support of the 1135 unit plan for the Ponte Vista development on Western Avenue in San Pedro, California.

I believe that this is the right project for the vacant land on Western Avenue. I am particularly interested in the senior units which would be the one level units. My wife and I have lived in our two story home in San Pedro since 1963 and are ready to down-size to a one story town house or condo in a secure complex. We support Ponte Vista being a gated community with walking trails and swimming pools.

I am looking forward to the Planning Commission and City Council approving the 1135 project which I feel is the best for Los Angeles and the Harbor Area.

Ephraim R. Mendoza

1290 W. 3<sup>rd</sup> Street  
San Pedro, CA 90732



[mendozaephraim@att.net](mailto:mendozaephraim@att.net)

B131-1



**Douglas Epperhart**  
1206 West 37th Street  
San Pedro, California 90731  
(310) 833-2980 / epperhart@cox.net

January 7, 2013

Erin Strelch  
Environmental Review Section  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2005-4516 Draft EIR: Ponte Vista, 26900 S. Western Ave., San Pedro

As a resident of San Pedro who would be greatly impacted by this development, particularly with regard to traffic, I offer the following comments.

The proposed project and its smaller alternative do not appear to be a good fit for the community. There are problems with the underlying assumptions and conclusions in the DEIR, mainly relating to traffic, social services, utilities and service systems. The analysis is based on faulty assumptions and so conclusions based on the analysis are also faulty. I am also concerned with the lack of any attempt to address the substantial environmental impacts through project design.

B132-1

Among the fundamental deficiencies in the DEIR are the following:

- Contrary to what is presented in the DEIR, the rezoning request will impair the orderly implementation of regional plans, the city's general plan, and two community plans. Additionally it fails to evaluate public health and social impacts and conformance with the 10 urban design principles and walkability checklist.
- The DEIR incorrectly identifies the project as conforming with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single-family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.
- The proposed project is not a good fit for the location. The gated community and mix of housing types are not appropriate, it is not in a transit oriented area, and its development would not improve the local jobs housing balance.

B132-2

B132-3

B132-4

- Alternatives B, C, and D ignore the present zoning which includes 15 acres of open space. This is an especially egregious oversight in alternate B because it claims to be a “no project” alternative, i.e. buildable as a matter of right. In fact, units cannot be built on that portion of the property zoned as open space.
- The traffic analysis uses incorrect assumptions about V/C ratios and traffic generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, that is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as onsite work centers, increased open space to address recreation trips, and additional library space.
- The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.
- The analyses and proposed mitigations for Greenhouse Gas Emissions, Hazardous Materials, Public Services, and Utilities and Service Systems are inadequate and flawed. They must be revised.
- The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single-family homes rather than a PUD, with work centers, commercial space, a public park that complies with the City Recreation Plan, and a library extension to meet state guidelines for library space.

B132-5

B132-6

B132-7

B132-8

B132-9

I also endorse the comments of the RNeighborsAre1 organization.

Thank you for your consideration.



Douglas Epperhart

From: [cathymonticantu@sbcglobal.net](mailto:cathymonticantu@sbcglobal.net) <[cathymonticantu@sbcglobal.net](mailto:cathymonticantu@sbcglobal.net)>  
Date: Mon, Jan 7, 2013 at 1:21 PM  
Subject: "PONTEVISTAENV-2005-4516-EIR"  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

We are for the plans to develop the San Pedro Ponte Vista project. Catherine A. Cantu and Frank Sardegna both living in San Pedro. Senior citizen's would benifit from this.  
Sincerely Cathy Cantu



B133-1

From: <[jpod6@cox.net](mailto:jpod6@cox.net)>  
Date: Mon, Jan 7, 2013 at 1:40 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org), [board@nwsanpedro.org](mailto:board@nwsanpedro.org)

Erin Strelich, Planning Assistant, LA Dept. of City Planning:

We live just across Western Ave. from the Ponte Vista property and rely completely on it as our sole vehicular access to the rest of the world. Residents of the proposed development will also be equally reliant on that street, which is the principal artery from the South Bay to all the homes, businesses and schools on the eastern and southern slopes of the Palos Verdes peninsula. Our immediate area is impacted by traffic from school busses, school parents, funeral processions to Green Hills cemetery, and commuters to work and shopping centers.

Because there is so much traffic on Western Ave. now, it is partially blocked for much of the day and clearly could not support the additional vehicular traffic from the project as presently proposed. Unless something is done to increase the capacity of Western Ave., the addition of this development would lead to gridlock.

We strongly oppose any development of the Ponte Vista property which would raise its occupancy above that allowed by the current R-1 zoning. Please restrict the development to single family homes.

Beverly & Jim O'Donnell Rancho Palos Verdes

B134-1

From: <[jyoshimoto99@aol.com](mailto:jyoshimoto99@aol.com)>  
Date: Mon, Jan 7, 2013 at 1:45 PM  
Subject: Ponte Vista  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strellich,

My husband and I are residents of Rolling Hills Riviera in RPV. We are asking you to keep the zoning of the Ponte Vista property on Western Avenue zoned R1.

The high density development of the property as proposed by the Developer will impact the area and adjacent areas in so many negative ways. One of the main problems will be the heavy traffic on Western Avenue in the morning and afternoon from Dodson Middle School, the traffic from morning and evening commuters, the traffic faced by emergency vehicles using Western will also delay life-saving time, and the traffic from the cemetery from funerals. With the additional drivers from the proposed development, there will be a log jam and some of the drivers will take a shortcut through our neighborhood to bypass the traffic. This will be horrendous, since in the past Western had some roadwork done and drivers were speeding through our neighborhood on Avenida Aprenda and Pontevedra. This resulted in accidents on our streets by reckless, impatient drivers. Please consider the safety of the many residents in the area by continuing to support the R1 zoning.

B135-1

Thank you for your time.

Sincerely,  
Joy Yoshimoto  
1863 Avenida Aprenda  
RPV, CA 90275

Ms. Erin Strellich, Planning Assistant  
 Los Angeles Department of City Planning  
 200 North Spring Street, Room 750  
 Los Angeles, CA 90012

RE: DEIR No. ENV-2005-4516-EIR – State Clearing House #2010101082  
 Ponte Vista Development – San Pedro, CA

Monday, January 07, 2013

Dear Ms. Strellich:

My comments concern the hazardous materials stored at Rancho LPG.

The items in bold are paraphrases of statements made in the DEIR.

**A potential exists for accidental releases of hazardous materials from the Rancho LPG facility to adversely impact future residents of the Proposed Project. Such accidental releases could theoretically range from on-site spills or releases of stored LPGs (in either vapor or liquid form) to on-site fires caused by the ignition of spills to catastrophic explosions of storage tanks. In addition, a smaller potential exists for risk of upset/accidental release from rail cars and/or trucks used to transport LPGs to and from the Rancho LPG facility along Gaffey Street and the adjacent (eastward) rail corridor.**

**TABLE B-1  
 POTENTIAL DISTANCES TO ENDPOINT FOR PIPE RELEASES  
 (for 1 psi Overpressure)**

Pipe Size (inches)	HA (inches <sup>2</sup> )	QR (pounds/minute)	Q Total Amount Released after 10 minutes (pounds)	D (Miles)
0.50	0.20	128	1,281	0.1
1	0.79	512	5,125	0.1
2	3.14	2,050	20,499	0.2
3	7.07	4,612	46,122	0.3
4	12.57	8,199	81,995	0.4
6	28.27	18,449	184,488	0.5

**EPA Guidance for Propane**

**6" pipe release Distance to Endpoint after 10 min (0.5mi)**

B136-1



**Cornerstone Technologies estimated worst case scenarios of 1.7 miles for a pool fire, 4.0 miles for a vapor cloud explosion, and 6.8 miles for a BLEVE based on conditions that are extremely unlikely to occur.**

Yes, the worst case scenarios listed above are extremely unlikely. However, the DEIR does not say they are impossible. Accidents like those have occurred with smaller tanks. They are possible. They have happened.

An hour after winning \$126,000 in the Fantasy Five game, Angelo and Maria Gallina won \$17 million in SuperLotto Plus. The odds of its happening are 1 in 24 trillion.

Winning two lotteries within an hour is also possible, because it happened, though the odds make it seem impossible. The highly improbable happens every day.

**A large magnitude earthquake (up to 7.3 magnitude) is likely once every 400-900 years.**

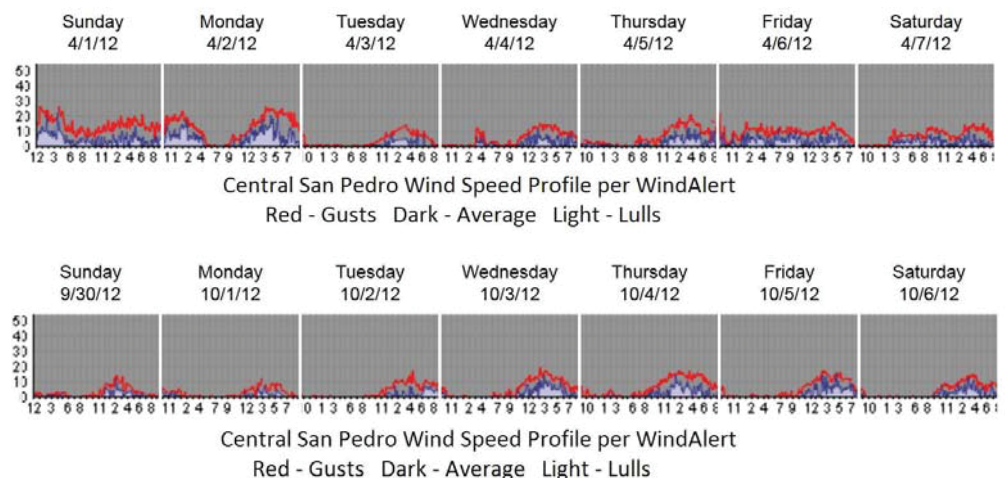
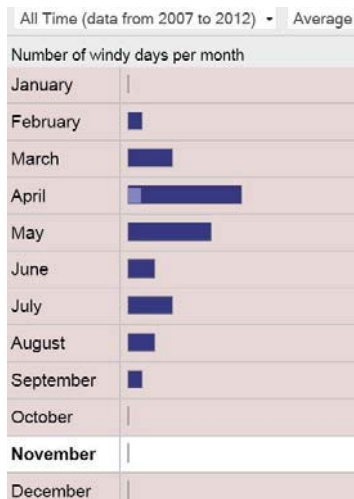
Since 1993, 63-year-old Joan Ginther, has won four big prizes on the Texas Lottery, each time winning more than \$1 million for a total of \$20.4 million.

**It is highly unlikely that the vapor cloud would distribute and ignite before reaching its maximum radius.**

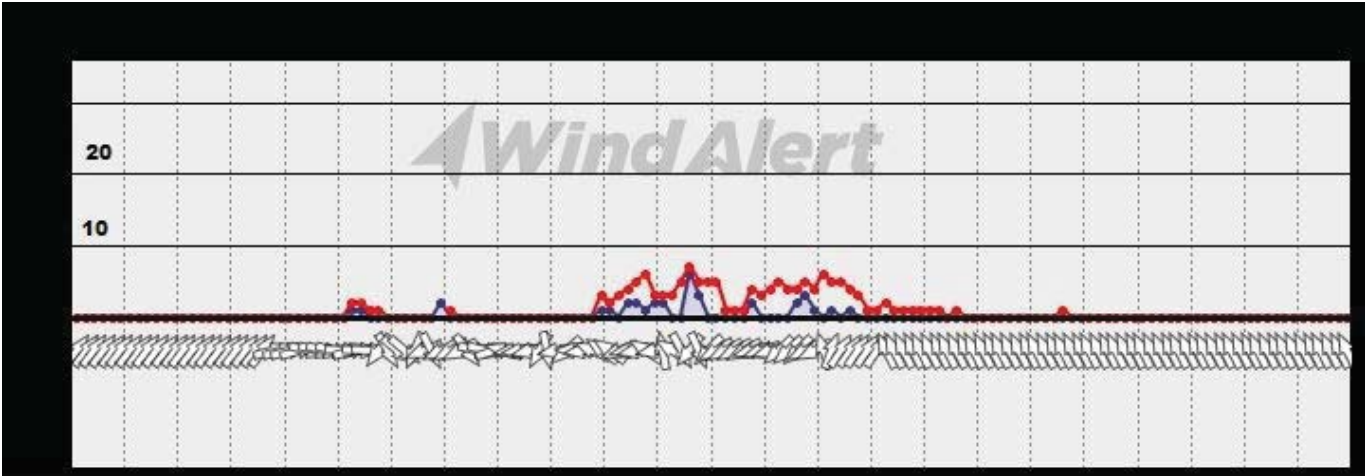
Edward Williams won \$75,000 in September 2008 playing a scratch off ticket and he won nearly \$900,000 the following August when he matched all the numbers in the “Super Kansas Cash” drawing.

There are spark generating electrical equipment on-site. It is near a frequently travelled road and two large stores. Sources of ignition are plentiful. And please refer to the pipe release numbers for the distance to endpoint of even a small pipe.

**Weather conditions in the harbor typically generate consistent yet variable wind speeds that would disperse the butane vapor more rapidly to prohibit dense, overpressure conditions upon ignition.**



B136-1  
(Cont)



Friday 23 November 2012

**Cornerstone Technologies did not consider the presence of on-site passive mitigation at the Rancho LPG facility and the analysis does not incorporate the effects of those safety features.**

The on-site passive mitigation is a catch basin. They are using a basin to contain a gas.

Granted the Butane will largely be in liquid form so the basin will channel where the 200 times expanding gas will expand. But all of those places are near ignition points.

Repeatedly throughout the DEIR the risks and scenarios of Rancho LPG critics has been called unrealistic.

However, maintaining that a catch basin can contain a gas with a boiling point of 31 degrees and a 16psig at 70 degrees is to my mind, unrealistic.

**A variety of laws and regulations governing the management and control of hazardous substances have been established at the federal level to protect the environment. Applicable regulations and requirements have been followed and no violations were found during two inspections of the facility in 2011.**

Councilman Buscaino held a public hearing with all the regulating agencies for Rancho LPG and it became obvious that the patchwork of regulations cover many aspects of Rancho, but none, really deal with its explosive danger.

The fire department does to some extent, but largely for run of the mill concerns like debris, extinguishers and the like. And only the Clean Air people have any staff.

After that hearing, no reasonable person could, or did, feel that there was adequate regulation.

And there is also the threat of a deliberate attack upon the Ranch LPG facility. Unlike Conoco-Phillips, the foot print of Rancho is small and the tanks are easily accessible.

B136-2

B136-3







B136-3  
(Cont)

The easy access to Rancho does make it distinct and of more risk than Conoco-Phillips.

**Based on the worst-case RMP scenario and with the more likely releases having a much smaller radius impact than 0.5 miles, there would be no impact to the Project Site.**

It might not be estimable, but there would indeed be an impact.

As was demonstrated by the lottery results, and our own life experience, we know that improbable, almost impossible things occur.

I ask that the DEIR reflect that reality.

Further, although the report is limited to the site. The site will be used to house people.

**A more likely alternative scenario for release of propane identified by the facility could result in a vapor cloud fire with an impact zone of 0.1 miles.**

It would seem to be incumbent upon the developers of the project to acknowledge the risk to those people they plan to sell to as they shop, go to work, go to school, or go walk their dog, that they may do so in an area that encompasses what the DEIR considers more likely scenarios for fires, explosions, injuries, loss of property, and loss of life.

B136-4

David Greene  
969 W. 25<sup>th</sup> St.  
San Pedro, CA 90731  
dgdavidgreene@yahoo.com  
310.381.9899

From: **Winnifred G** <[wgmndray@dslextre.me.com](mailto:wgmndray@dslextre.me.com)>

Date: Mon, Jan 7, 2013 at 2:22 PM

Subject: Ponte Vista ENV -2005-4516 EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Greetings,

I would like to strongly support RI Zoning on the land in question and I still oppose this project as proposed in Alternatives A and C.

My home is located 3 blocks from Western Avenue, which I use very often - but at certain hours of the day ONLY - because of the PRESENT traffic congestion I shudder to imagine what havoc the proposed additional number of residents would present.

At present, the residents fear a catastrophe happening when a funeral is taking place at Green Hills. The City Planners must be out of their minds to entertain the thought of changing this zoning designation.

Hopefully, common sense will prevail.

Sincerely,

Winnifred Dray

B137-1



**SIERRA  
CLUB**  
FOUNDED 1892

**Palos Verdes - South Bay Group / Angeles Chapter**

January 7, 2013

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Fax: (213) 978-1343  
erin.strellich@lacity.org

Re: Draft Environmental Impact Report (DEIR) Ponte Vista Project, No. Env-2005-4516-EIR

Dear Ms. Strellich:

The Sierra Club finds the above-referenced Draft EIR to be seriously flawed and recommends that the DEIR for the Ponte Vista project not be approved.

The Sierra Club is opposed to the removal of the OS-1XL designation for Open Space on the project site.

The Sierra Club is also opposed to any increase in the existing R1-1XL housing density on the project site.

The DEIR purports to be using an environmentally sound principle of concentrating development in urban centers as a justification to significantly increase the zoning density of the Ponte Vista project. While Sierra Club policy does support compact development within appropriate existing urban centers as a planning tool to avoid urban sprawl that paves over natural areas, Sierra Club policy cannot be used to justify approval of an increase in development density in an area already characterized by highly congested and often gridlocked roadways as is the case along the Western Avenue corridor in San Pedro and Rancho Palos Verdes.

Barring the establishment of public transportation options that would be likely to reduce the traffic volume along this corridor, the Sierra Club cannot support an increase in zoning density in this area and therefore opposes the proposed Ponte Vista Project of 1,135 units. For the same reason, the Club opposes Project Alternatives C (830 units) and D (1,135 units).

The Sierra Club also is opposed to Alternative B (385 units) because it would not comply with the existing OS-1XL Open Space designation.

The Conceptual Site Plan for Alternative B shows a stair-stepped diagonal configuration, presumably located on the earthquake setback zone, which is labeled as "open space". This

B138-1

**P.O Box 2464 • Palos Verdes Peninsula, California 90274**

area is not as large as the currently zoned OS-1XL area, nor is it in a location contiguous with the DFSP native habitat area. Therefore the location shown is of far less potential habitat value than the existing zoned area.

Should the applicant wish to relocate the OS-1XL area on the project site, a preferred alternative would be to restore 9.1 acres including the remnant riparian area in the southwest corner of the site.

While the area is not in its natural state and may currently have limited native flora and fauna, it has the potential to be restored with riparian and other native vegetation that may attract the PV blue butterfly and the California Gnatcatcher, particularly given the parcel's proximity to the Defense Fuel Supply Point. The DFSP provides a relatively small patch of habitat for the threatened Palos Verdes blue butterfly, a species rediscovered there in 1994 after it was thought to be extinct. Expanding the butterfly's host plant restoration into the Project area would enhance the potential to grow this species population thereby improving the possibility for long-term success.

Given the project proposal and Alternatives provided, the Sierra Club can only support Alternative A—no development— which offers community and environmental benefits that the Sierra Club does support.

B138-1  
(Cont)

B138-2

Sincerely,



Alfred Sattler

Chair

Palos Verdes-South Bay Regional Group

From: **Scott Allman** <[sra500@hotmail.com](mailto:sra500@hotmail.com)>  
Date: Mon, Jan 7, 2013 at 2:26 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [diananave@gmail.com](mailto:diananave@gmail.com), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

Dear Mr. Strellich,

Here is a list of my comments in regards to the Ponte Vista project:

The zoning should stay R1. It was zoned R1 when San Pedro had less people and it should stay that way. There are too many people in San Pedro as it is now.

The build out should only be for 5 years not for 15 years as iStar has requested. A build out that long will become another eye for the city.

A traffic study was done but there is nothing that says the city will apply funds given to the city by iStar to fix the concerns that will come with building Ponte Vista. The city has not tried to fix the current problems with traffic.

B139-1

Thank you for your time.

Many Thanks,

Scott Allman

January 7, 2013

Dear Councilmember Buscaino and Ms. Strellich,

My family and I as well, as many of our friends and neighbors, are very concerned about iStar Financial's plans and tactics for the Ponte Vista property. Unfortunately, with their release of the EIR report just before the holidays, not affording an adequate time for the public to become informed and respond, reminds us of Bob Bisno and his underhanded techniques.

We remain very concerned about what happens to the property. Ideally, we would love for it to become a recreational site of some sort: a park or a golf course-something open and green.

If that is not possible, then we remain firm in believing that the zoning not be changed, that the property remain zoned R1. The property was purchased as R1 and should remain so. Even keeping the property zoned R1 can't help but have a negative impact on the traffic on Western Avenue.

We live west of Toscanini and Western. There are certain times of the day we cannot turn south onto Western because the traffic is backed up solid to Caddington. Then the traffic is bumper to bumper until past First Street. Adding more cars will only be a disaster!

What about the infrastructure? Is it capable of handling added population? What about the Naval Depot? Has enough consideration been given to it and the hazards it imposes? What about Mary Star? Is a permanent access in the plans? What about all of the unsold properties just south of Ponte Vista? Has any consideration been given to the wishes of the citizens of the community? Why hasn't the community been given a chance to comment? Why haven't there been open meetings? Something doesn't "smell right."

Thank you for listening,  
Winnie M. Verner  
2133 Rockinghorse Road  
Rancho Palos Verdes, CA 90275  
310 831-4321



B140-1



B140-2

B140-3

B140-4

B140-5

B140-6

From: <[JWNORTON@aol.com](mailto:JWNORTON@aol.com)>  
Date: Mon, Jan 7, 2013 at 2:47 PM  
Subject: "Ponte Vista ENV-2005-4516-EIR."  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

To whom it may concern,

Are you really serious about wasting our money putting this on the ballot? You might be the only ones voting for it. My family and friends will never vote to raise our taxes or the school's taxes. Imagine, \$8,000 for the over 400 schools in the LAUSD. You are you kidding us, right?

John Norton

B141-1

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Erin.strellich@lacity.org

January 7, 2013

Re: DEIR Ponte Vista Project, No. Env-2005-4516-EIR

Dear Ms. Strellich,

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Ponte Vista project. We have noted a number of inadequacies in the DEIR, and thus we request that the DEIR be substantially revised and not be approved. Our concerns are as follows:

**Impediments to Public Comment**

The digital copy of the DEIR (*Page I-5*) presents an incorrect email address for the submission of comments. If public comments were sent to that address, it is quite possible that they would not have been received in a timely manner, and the submitter might not possibly be aware of a problem until after the submission deadline.

Although we appreciate having a public comment period of 60 days, the scheduling of the public comment period over the winter holidays is unfortunate. That scheduling may have had the effect of minimizing public comment to some extent.

B142-1

**Inherent Bias in Review Document**

The DEIR seems to be biased towards maximizing the number of housing units in order to maximize the Developer’s profits regardless of impacts to the surrounding community. Impacts to the neighboring communities, particularly to the Eastview neighborhood in Rancho Palos Verdes, seem to be underplayed or even ignored by the DEIR. One wonders if impacts to Eastview, which is just across the street from the proposed project, are being disregarded primarily because it is outside of the jurisdiction of the city of Los Angeles. Should that be the case, we would like to remind you that impacts to the Eastview neighborhood will also affect each and every family that has a child attending Dodson Middle School. That LAUSD school is located entirely within Eastview.

B142-2

**Inadequate Representation of Cumulative Impacts**

We were not able to find any mention in the DEIR of the recently constructed condominium development, Seaport Village, which is located south of and directly adjacent to the project site. It is our understanding that because that project has failed to sell many of the new condominium units, they were allowed to convert units to rentals. We do not know whether the development is currently fully occupied.

The DEIR’s failure to address this adjacent development is significant because:

1. It demonstrates a lack of market demand for condominiums in the area. The proposed project design ignores that evidence, and instead proposes to further saturate the condominium construction in the area.
2. If the proposed project condominiums also prove to be undersold and are likewise converted to rental units, then the Environmental Review must appropriately analyze that possibility. The DEIR does not address that potential change in usage.

B142-3





- 3. If the Seaport Village is not yet fully occupied, the traffic study for the current project cannot be considered valid unless it considers cumulative impacts including the eventual full occupation of that existing development.

B142-3 (Cont)

**Inadequate Analysis of Traffic Impacts**

As non-professionals we find it difficult to interpret the traffic data provided. We do not fully understand what is actually being identified and measured by the studies and whether such measurements are adequate and reliable enough to be used as the sole basis for traffic evaluations. As neighbors however, we are aware of the existing local traffic impacts from Western Avenue and we do not see all of those impacts addressed by the DEIR.

B142-4

For instance, the DEIR selectively studies a few sample intersections along Western Avenue itself. It does not acknowledge or address the frequent gridlock situations that occur just off of Western on the various feeder streets in the adjacent neighborhoods even though increased traffic on Western will impact adjacent neighborhoods as well.

The DEIR also fails to anticipate spontaneous driver shortcuts during congested situations. One situation we can imagine with the proposed increased focus of traffic to the intersection of Avenida Aprenda and Western Avenue is southbound drivers cutting over to the small neighborhood street parallel to Western Avenue (labeled as Tarrasa Drive in the Thomas Guides and as Western Avenue on Google maps) just before Avenida Aprenda in hopes of a shortcut. This will result in them having to either make a left hand turn onto Avenida Aprenda to return to the main artery of Western – causing congestion at the intersection of Tarrasa and Avenida Aprenda, or will result in them seeking alternative routes within the neighborhood.

B142-5

In regard to school traffic, we have noted that the traffic pattern to and from Dodson Middle School seems to shift in location somewhat from year to year. We do not know whether this might be due to scheduling changes, bus routing changes, or parents changing routes in response to congestion patterns. The pattern of change however leads us to wonder how reliable some of the intersection studies might be. Furthermore, the intersection studies seem to only count the number of cars traveling through an intersection at a given time. Do such counts really reveal gridlock situations?

B142-6

Emergencies

The DEIR acknowledges the receipt of prior concerns regarding traffic impediments in an emergency situation. However the DEIR analysis in this regard is completely inadequate – it offers only a reference to the designation of evacuation routes by the cities of LA and RPV and then glibly concludes that since the section of Western Avenue between Summerland and Palos Verdes Drive North is not identified as an evacuation route by either city, that we residents of the Eastview neighborhood should just stay where we are. Apparently, according to this DEIR, evacuation routes are only for selected areas other than ours. (Remember, our neighborhood includes Dodson Middle School!) It seems that in this regard, the DEIR has actually identified a failure of these combined evacuation plans – but rather than so stating, the DEIR rationalizes those inadequate plans as the complete context for their analysis and does not bother to analyze any further.

B142-7

The DEIR downplays the likelihood of a single extreme case scenario of evacuation from the port and states that emergencies are much more likely to occur at smaller localized settings. However, it then completely ignores the potential impacts of congested traffic on emergency access and response times. We often hear sirens of emergency vehicles on Western. The sirens are often accompanied by much horn blowing as the emergency vehicles struggle to get through the current traffic conditions. This situation will only become worse if traffic is increased to any degree.

Furthermore, the DEIR does not address the fact that Western Avenue is the ONLY ingress/egress corridor for the Eastview neighborhood and Dodson Middle School. There are NO alternate routes. Therefore any increase in traffic congestion on Western Avenue, particularly in the vicinity of the proposed project, will significantly impact emergency response time and ease of evacuation to and from Eastview and Dodson.

B142-8

Of course, the proposed project configuration would also create an obstructive bottleneck in emergencies at Western Avenue for both the Ponte Vista project itself and the surrounding community.

B142-8  
(Cont)

Extension of Avenida Aprenda east of Western Avenue

The DEIR characterizes the proposed extension of Avenida Aprenda from Western Avenue to Mary Star of the Sea High School as a “benefit to the community.” In actuality, such an extension has several problematic aspects.

B142-9

It is our impression that the intersection of Avenida Aprenda and Western already has a rather high incidence of accidents. Adding another direction of approach to that intersection will likely increase the number of accidents there because of the need for numerous left hand turns from all directions.

Furthermore, the extension of Avenida Aprenda as proposed would simultaneously focus heavy school commute traffic for both Dodson Middle School and Mary Star of the Sea High School to a single intersection at Avenida Aprenda and Western Avenue. How can that possibly be considered a good idea? Dodson traffic alone is enough to cause gridlock. Add new high school age drivers having to make left hand turns into a congested intersection in the context of drivers frustrated by traffic delays and trying to get to school or work on time and you have a recipe for increased numbers of traffic accidents.

B142-10

For these reasons, the extension of Avenida Aprenda seems to be a detriment rather than a benefit to the Eastview neighborhood. Such an extension might potentially provide some limited additional east-west ingress/egress. However, usage for such a purpose seems to be restricted to limited school access according to the DEIR.

Underrepresentation of existing traffic backups

The DEIR dismisses concerns about traffic backups from funeral processions to Green Hills Cemetery as “mere minutes.” In actuality, these backups occur fairly frequently and the delays are often such that drivers turn off their engines to wait, sometimes for a considerable amount of time. For larger processions when the funeral procession is northbound and thus making a left turn into the cemetery, the, southbound traffic backs up almost to Palos Verdes Drive North. This can be a dangerous situation for the last cars in line when additional cars turn onto Western from PV North at speed and because of the hill contour, do not see the backup until the last minute. Of course, traffic also backs up in the northbound direction at the same time, for comparable distances. The DEIR’s assertion that these processions generally do not occur at peak commute hours does not mean that the problem is insignificant or that adding additional cars to the mix will not exacerbate the existing problem.

B142-11

The DEIR also fails to address traffic backups which occur in the adjacent neighborhoods on feeder streets to and from Western Avenue.

Additional traffic problems

The DEIR fails to examine potential traffic problems such as that which impacted the Eastview neighborhood several years ago when a huge sinkhole developed on Western Avenue. At that time traffic from Western was diverted into the Eastview neighborhood, particularly to Pontevedra Drive, which is a narrow winding residential street roughly parallel to Western. For several weeks, that small residential street was subject to the entirety of southbound Western Avenue traffic including multi-axle delivery trucks, buses, construction vehicles and commuter autos. We vividly recall the frustration of the Sheriff’s Department who were called out after an auto accident during school commute hours at the intersection of Pontevedra Drive and Avenida Aprenda. The neighborhood streets were not designed to accommodate that intensity of traffic. Adding even more vehicles to the mix cannot be characterized as a responsible plan.

B142-12

Inadequacy of Mitigation for Traffic Impacts

The traffic mitigation measures offered by the DEIR seemly to consist only of a few dedicated turn lanes and the addition of a few signal lights. While these measures might provide some accommodations for cross traffic, they do nothing to address overall traffic congestion or emergency access.

B142-13

At the same time, the DEIR fails to consider any possible options for mass transit mitigations to traffic impacts. For example, a mitigation measure could obligate the Developer for the life of the project to pay for doubling the frequency of the Metro #205 bus, which presently runs along Western Avenue.

The DEIR fails to acknowledge that at some point an existing road infrastructure reaches capacity and that it is not reasonable to think that the traffic load can be indefinitely increased to a single artery using that existing infrastructure. Denial of the significance of impacts or band aid mitigation measures do not sufficiently or honestly address the problem.

B142-14

**Project Density**

The DEIR fails to transparently discuss current zoning for the project site in the early discussion of conditions and setting. It is only after delving into Volume 2 of the DEIR that the reader discovers that not only is the majority of the site zoned R-1, but that the northern portion of the site is zoned for Open Space as OS-1XL.

The DEIR seems to be biased in favor of maximizing the number of housing units and of weighing that “value” more strongly than the project's impacts to the quality of life of the surrounding community.

Increased density is not necessarily “smart growth”. Without appropriate supporting infrastructure and efficient design that takes the context of the surrounding community into account, density is neither smart nor “green”. Transitioning to “smart growth” within the vast sprawl of southern California is quite a challenge. Merely accumulating pockets of great density within the existing infrastructure is not a reasonable methodology for achieving a more efficient and livable urban design.

B142-15

In order for a densely populated residential area to be added to the project site to be a “smart” design, there would need to be a functional network of alternative travel corridors to serve not only the project, but the surrounding neighborhoods. Such a network of corridors does not currently exist, nor does such a network seem to be locally feasible in the foreseeable future given the constraints of the surrounding properties.

Perhaps if public transportation options were improved considerably the volume of private automobiles could be reduced to a level that would improve traffic flow. However, such a change has not yet occurred, nor is it currently planned. Therefore that scenario cannot be used to justify increased population density at the project site.

The existing road infrastructure was designed to serve zoning consistent with the existing R-1 zoning of the project site. Since the road system was built, more and more large projects have been implemented in the area. These cumulative increases in density have resulted in a road system that is already over-burdened and congested. It makes no sense to continue to increase density beyond the infrastructure’s designed capacity. Merely adding some turn out lanes and stop lights does not mitigate the congestion and gridlock.

**Impacts to the Character of the surrounding Community**

The DEIR understates the impacts of adding multiple additional multi-story buildings to the project site. The fact that some such buildings were recently constructed adjacent to the proposed project site does not make a continued proliferation of buildings of such massive scale acceptable. Whether or not there is a “view” to consider, a blockade of large buildings surrounding the public corridor and facing existing neighborhoods will certainly degrade the feel and character of the surrounding community.

B142-16

**Developer Profits vs. Community Quality of Life**

The Applicant’s desire to maximize his financial profits from the project should not be a consideration of the DEIR. The business of the DEIR is to evaluate project impacts to the environment and the surrounding community.

We do not believe the DEIR’s argument that under the R-1 designation the Applicant can only build high end homes on the site. That is merely the Applicant’s argument designed to maximize profits. We suspect that it would be quite feasible to build moderate-valued homes under the R-1 designation and that such homes would be as desirable for families there as they are in the Eastview neighborhood across the street.

B142-17

**Greenhouse Gas Emission Reduction and Energy Conservation**

The DEIR does not consider the opportunities to reduce emissions of carbon dioxide by installing rooftop solar photovoltaic and rooftop solar hot water heating systems.

The DEIR does not consider opportunities for energy conservation by using LEDs for parking lot lighting, and indeed for interior lighting throughout the project.

B142-18

**Water conservation**

The DEIR does not discuss opportunities for water conservation using greywater for landscape irrigation.

B142-19

**Natural Space and Habitat Issues**

The DEIR seems to be trying to conceal the fact that approximately nine acres of the project site is currently zoned as Open Space, OS-1XL. The DEIR does not address the proposed project’s lack of compliance with that zoning designation.

There are two areas on the property of potential natural habitat value. One is the northernmost section abutting the DFSP natural area. The second is the remnant riparian area in the southwest corner of the property.

B142-20

The biological reports included in the Appendices of the DEIR indicate that northern section of the property has good potential for restoration to a natural biological habitat because of its proximity to the DFSP natural area where restoration efforts have been made for the Palos Verdes Blue Butterfly and the California Gnatcatcher. Those biological reports also indicate that although the riparian area has been quite degraded by re-contouring the drainage and lining it with concrete and asphalt, it could be re-vegetated with appropriate native plants and restored to a more naturalistic configuration.

Even in its currently weedy and degraded state, the open space on the project site is valuable to us as neighbors because it provides an opportunity to be able to look out onto the landscape and visualize what the original natural state of our surroundings might have been. It is interesting to consider how the remnant drainage might have originally connected from George F Canyon above Palos Verdes Drive East extending out to what is now Harbor Lake, and how that might relate to the geological contours of our neighborhood. We enjoy seeing hawks and other common wildlife in the area, although it is disturbing to see the goats which are employed for weed control to keep the weedy vegetation under control on the project property stripping the bark from the native willows while they leave some of the worst weedy grasses untouched.

B142-21

Certainly from our neighborhood, we would much prefer to see, and to be able to visit a natural area that has been restored to its original native habitat function than yet another blockade of enormous three and four story buildings.

**Concerns Regarding Alternative B**

We had hoped that Alternative B would be the best option because it does comply with the currently zoned R-1 density. However the design option for that Alternative as presented in the DEIR is at best only a grudging concession to R-1 limitations with a simplistic grid configuration designed only to maximize the number of dwelling units within the space without any other considerations, including complying with the OS-1XL zoning on the site. The design proffered for Alternative B is so bare bones that it is hard to imagine how it could possibly appeal to the upscale market it is supposedly designed to attract. Instead, it seems to be intended to be unappealing so as to force consideration to the more lucrative densely populated project Alternatives.

We believe that it would be quite possible to design a Project Alternative that meets the population densities capped by the current R-1 zoning and that incorporates the existing OS-1 zoning to include some natural habitat designation. We acknowledge that a more concentrated housing configuration than single family homes might be workable for that site, but the total number of occupants should not exceed the existing R-1 zoning.

A truly optimal design Alternative for the project site would cluster the allowable housing, retain and restore natural habitat on site, and provide additional outdoor recreational amenities to the project. We believe that such a design would be more consistent with “smart” growth and would have more market appeal than any of the Alternatives currently proposed in this DEIR.

**Conclusion**

The DEIR for the Ponte Vista project does not adequately consider or mitigate the proposed project’s impacts to the surrounding community. Impacts to traffic congestion, and safety and to emergency ingress and egress in the area would be particularly severe and have not been adequately addressed by the DEIR or mitigated by the project plan. The DEIR also fails to adequately address the project’s lack of compliance with the current R-1 and OS-1X land use designations.

Additionally, the inclusion of an incorrect address for the submission of public comments is a serious flaw. A public notice of that error and a substantial extension of public comment time should be provided to address that issue.

Although we appreciate the staff recommendation of the somewhat downsized Alternative C, given the existing context of the site, that Alternative is not downsized enough. Frankly, we find it difficult to even comfortably anticipate the increased impacts of 385 units with Alternative B. We are opposed to Alternative B because of its poor design and failure to adequately comply with the existing Open Space zoning designation.

Therefore we prefer Alternative A, the No Project Alternative, especially if the land were restored to an appropriate native habitat.

Sincerely,

Barbara and Alfred Sattler  
Rancho Palos Verdes Residents

B142-22

B142-23

B142-24

From: **SANDRA BRADLEY** <[sbradley@ca.rr.com](mailto:sbradley@ca.rr.com)>  
Date: Mon, Jan 7, 2013 at 3:25 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Strellich:

I have lived and worked in San Pedro for over 25 years. I have been involved with and supported the Ponte Vista project since its inception and have seen many design changes and feel that the New Ponte Vista project is the best. I believe the new owners have listened to the community and have taken their ideas and concerns and incorporated them into the new plans.

I have reviewed the project and met with the outreach team and I support either the 830 units or the 1135 units, as both designs are good for San Pedro and they provide a variety of housing models to fit a variety of lifestyles and budgets.

I understand from meeting with the project team, that all the traffic impacts of the project can be fully mitigated with traffic improvements in the area. That's great as I live near Western Ave. and it is my main commuter route. I feel that getting this project completed will turn a not-very-attractive part of San Pedro into a beautiful residential complex complete with open, green space.

Thank you for your consideration of my comments.

Sandra Bradley  
San Pedro

B143-1

From: **rachel viramontes** <[rvira@sbcglobal.net](mailto:rvira@sbcglobal.net)>  
Date: Mon, Jan 7, 2013 at 3:28 PM  
Subject: PonteVista ENV 2005-4516 EIR Comment  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Erin and Planning Review Board:

My name is Rachel Viramontes and I am in support of the new 1135 plan. I have lived in San Pedro and Rancho Palos Verdes, not far from the site, my entire life.

I have been a longtime supporter of Ponte Vista and feel the 1135 plan is a good compromise. The reason I favor the 1135 and not the 830 is because of today's economic times. Purchase costs would be higher and HOA costs would also be higher because it would be spread out over less units.

I drive through that area to drop off or pick-up my grandson and it is been a long time eyesore for our community. The Ponte Vista plan will also fill the needs for all seniors, singles and families hoping to make changes to meet their changing lifestyles. We need to have a plan that reflects the vitality, needs of our multi-age, single and family community. I believe the anticipated traffic impact can also be fully mitigated with proposed traffic improvements in the area. It will also provide a permanent road to Mary Star of the Sea High School which is much needed and wanted by our community.

I am active in our community and am President of a Senior Club with 400 members. Although there are some who don't like change or do not agree the overwhelming majority agree with this new PonteVista plan and are anxious to see it in our lifetime.

Let's build something great and positive for our community, again I support the 1135 plan.

B144-1

From: **Rivera David L.** <[dlrivera@prodigy.net](mailto:dlrivera@prodigy.net)>  
Date: Mon, Jan 7, 2013 at 3:32 PM  
Subject: "PonteVista ENV-2005-4516-EIR"  
To: Erin Strellich <[erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)>

Erin Strellich  
Planning Assistant  
Los Angeles Department of City Planning

I herby render my comments on the Ponte Vista EIR. It is my opinion that the developer will be creating a huge increase in traffic on Western Avenue by this project. The proposed increase in traffic signals in that area will also cause the slowing of traffic. I support that this former Naval property zoning stay at R-1, that single family homes be built on that property. The condominiums built nearby, have not been able to sell, so the developer was forced to lease or rent, which I feel will also happen with the Ponte Vista project.

B145-1

As a member of the San Pedro Peninsula Homeowners United, I duly support their "Ponte Vista R-1 Comments." on this project.

David L. Rivera  
1913 Taper Avenue  
Northwest San Pedro CA 90731  
Community of the City of Los Angeles



From: <[Houske@aol.com](mailto:Houske@aol.com)>  
Date: Mon, Jan 7, 2013 at 3:50 PM  
Subject: "PonteVista ENV-2005-4516-EIR"  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [donna.littlejohn@dailybreeze.com](mailto:donna.littlejohn@dailybreeze.com), [letters@dailybreeze.com](mailto:letters@dailybreeze.com)

1.7.2013

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring St., Room 750, Los Angeles, CA 90012

cc: Daily Breeze and Congresswoman Janice Hahn

**RE: "PonteVista ENV-2005-4516-EIR"**

To Whom It May Concern,

What is severely lacking on this issue is VISION. Hundreds of studies show that one of the most important things to be created and maintained in developed areas (be they ultra-urbanized or suburban, and no matter the income level), are PARKS.

Looking back, it is easy to see that the land should not have been sold by the government. The land should have been maintained as public parkland. The South Bay once had so much open space, but it has been decimated for decades, through thoughtless planning.

Why not buy back the land and turn it into a park? How much open space IS there in the South Bay? How many parks ?! Not enough! Furthermore, people need places to run their dogs, to walk and exercise and play, and to enjoy nature. Who needs more houses? The traffic on Western is frequently to bursting. And "five corners" at Anaheim and PV North is already jammed as well.

Where is it written that we must develop every square inch of open land? Open space is ultimately more valuable to the current So. Bay residents, and increases the property values as well. It is not our intrinsic obligation to create more housing, just because a developer "wants to." It is in the best interest of the public to turn this area into a wonderful park. South Bay's own "Central Park" of sorts.

The BIG VISION would be to create a wildlife bridges over Gaffey, to connect Harbor Park (aka Bixby Slough) to this proposed new park, and then a bridge over Western to connect to Green Hills / Palos Verdes / the ocean's coast. This would create a rare corridor for the little wildlife which is still in the area.

B146-1



On every level of analysis, if reason prevails, this area should be a park. We have no need for more people, more traffic, and all the surrounding issues. We desperately need more open space.

↑  
B146-1  
(Cont)

M Houske  
Rancho Palos Verdes

From: **Joyce Dillard** <[dillardjoyce@yahoo.com](mailto:dillardjoyce@yahoo.com)>

Date: Mon, Jan 7, 2013 at 3:56 PM

Subject: Comments to Ponte Vista Project ENV-2005-4516-EIR due 1.7.2013

To: Erin Strelch <[erin.strelch@lacity.org](mailto:erin.strelch@lacity.org)>, The Honorable Carmen Trutanich <[CTrutanich@lacity.org](mailto:CTrutanich@lacity.org)>

The address for the applicant is not on record with the State of California Secretary of State:

SFI Bridgeview, LLC  
P.O. Box 989  
San Pedro, California 90733

B147-1

The address on record is:

1114 Avenue of the Americas 39<sup>th</sup> Floor  
New York, NY 10036

Reports in the document need to be updated to the current approved plans such as, but not limited to:

- SCAQMD RTP Regional Transportation Plan
- SCAQMD RHNA Regional Housing Needs Assessment
- Los Angeles Region Basin Plan for Coastal Watersheds (LA Basin Plan)
- Order R4-2012-0175 for the Final Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4

B147-2

You omit:

- Greater Los Angeles County Integrated Regional Water Management Plan
- Los Angeles County Sediment Plan

B147-3

You also need to incorporated fault activity with condition of the Circulation System and with Water and possible contamination. The City has failed to update Elements of the General Plan including the Circulation Element.

B147-4

TMDLs Total Daily Maximum Loads have been incorporated in the LA Basin Plan. No mention was made of Watershed Management Program and Watershed Management Areas, now part of the new MS4 permit. Those Beneficial Uses are:

- Industrial Water Supply (IND)
- Water Contact (REC-1)
- Non-Contact Recreation (REC-2), including aesthetic enjoyment; Navigation (NAV)
- Commercial and Sport Fishing (COMM)
- Mariculture; Preservation and Enhancement of Designated Areas of Special Biological Significance (ASBS)
- Rare and Endangered Species (RARE)
- Marine Habitat (MAR)
- Fish Migration (MIGR)
- Fish Spawning (SPWN)
- Shellfish Harvesting (SHELL)

B147-5

Mitigation measures need to be in perpetuity with funding identified. Liabilities need to be identified.

B147-6

EPA has not approved the State Implementation Plan for the SCAQ MD.

B147-7

You have not incorporated the Port of Los Angeles environmental needs including wetlands restoration and wetlands banking in relationship to this document. How are settlements from prior lawsuits affecting this project.

B147-8

Other issues such as Migratory Birds and wildlife need addressing and mitigation.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

From: <[HiYoShea@aol.com](mailto:HiYoShea@aol.com)>  
Date: Mon, Jan 7, 2013 at 3:58 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

As a 17-year resident of San Pedro I am greatly concerned about the proposed development of Ponte Vista. I have attended the few (and I mean few) public meetings the developer has had for the public and am even more concerned than before.

San Pedro has only two main streets that lead into and out of our small community: Western Avenue and Gaffey Avenue.

The traffic on Western is already congested at rush hour and when school lets out. To add a development of this size will create major problems not to mention safety issues in an emergency.

The number of 1,135 is ridiculous and even a development of 830 homes will add too much traffic and additional residents to our already congested neighborhood.

Please do NOT approve this development until further public input can be obtained. I was disappointed that the developer held so few meetings for the public! I know it is because they know we would be against what they are proposing!

Please maintain some quality of life for those in San Pedro!!

Thank you very much for your consideration in delaying approval of their proposal!!

Terri Shea  
2021 Stonewood Court  
San Pedro, CA 90732  
[310-831-9937](tel:310-831-9937)

B148-1

January 7, 2013

To Whom It May Concern:

Subject: **Ponte Vista ENV-2005-4516-EIR**

My name is Louis Dominguez. My wife and I have lived in San Pedro for over 40 years and I have been very active in the community, including chairing the committee that raised the funds to light the Vincent Thomas Bridge.

We support the Ponte Vista DEIR with 1135 homes. San Pedro is in desperate need of affordable housing and this is the first (and probably last) opportunity to obtain some.

We need to improve the attractiveness of San Pedro, especially at its entrances, and Western Ave. is one of the major ingresses.

Please feel free to contact us at 310-547-4145 should you need and further comments.

Sincerely,

Louis and Suzanne Dominguez

Louis and Suzanne Dominguez

845 W. 30th St. San Pedro, CA 907431

B149-1

From: **kathi moen** <[kathimia@msn.com](mailto:kathimia@msn.com)>  
Date: Mon, Jan 7, 2013 at 4:07 PM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

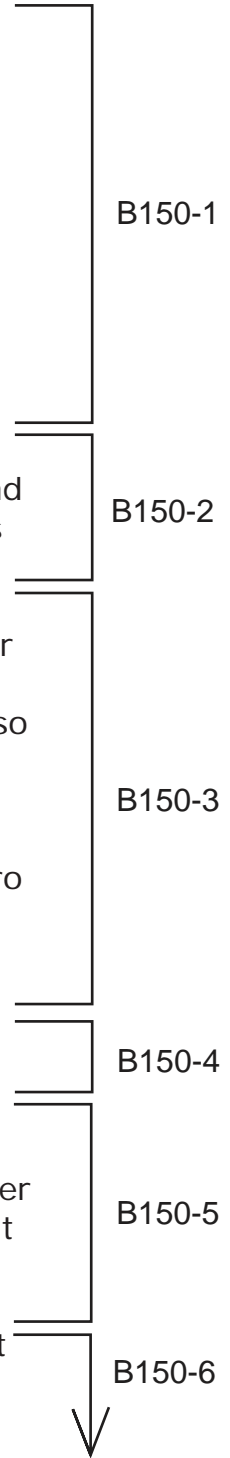
To the Planning Commission:

**I support R1 zoning and still oppose this project as proposed in Alternatives A and C.**

***the Jan 7 deadline is unreasonable, and requiring comments over the holiday season does not allow sufficient time for review and comment.***

**Summary of Some Principal Comments**

1. The time to respond to the DEIR is too short. It should be extended. Under the circumstances, it is legally insufficient and the additional two weeks given is inadequate given that the holiday seasons were being observed for most of the reply period.
2. The DEIR focuses almost exclusively on alternate D for 1135 units despite identifying alternate C for 830 units as the preferred alternative, and inadequately analyzes alternate B, for 385 units, despite being identified as having even less environmental impacts.
4. The DEIR incorrectly identifies the project as being in keeping with the surrounding neighborhoods. In fact, it ignores the shortfall in San Pedro for single family homes, and instead proposes housing types that will directly compete with unsold housing units immediately south of the project and also in downtown San Pedro in the former CRA project area.  
4 generation rates, and proposes mitigations that essentially shift and increase the traffic burdens onto traffic going and coming from Wilmington, Harbor City, and Rancho Palos Verdes, and which is not related to San Pedro in any way. Further, the DEIR and the proposed Alternatives, all of them, fail to consider traffic mitigations such as on-site work centers, increased open space to address recreation trips, and additional library space.
6. The DEIR uses data that differs markedly from data included in the San Pedro Community Plan Update EIR. The two should be consistent.
7. The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. I suggest a project alternative that includes access to Mary Star, true single family homes rather than a PUD (planned unit development), with work centers, open space that complies with City Guidelines, and a library extension to meet State Guidelines for library space.
8. There is also a concern for the increased demands on infrastructure that



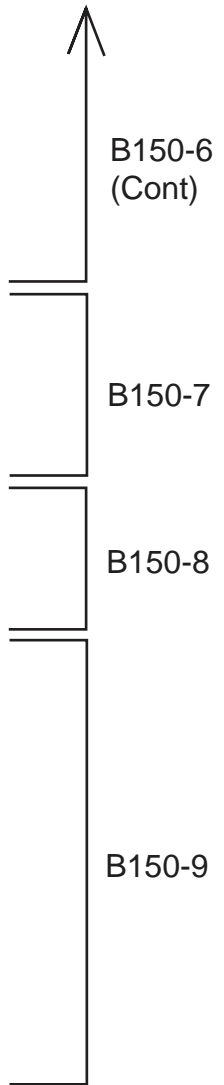


a project of this size will generate. Where will the water come from and how can it be guaranteed? LADWP already has aging equipment and facilities that needs replacement. This will only exacerbate this condition in the area. It is hard to know what the extent of the problems will be as the City of Los Angeles has not conducted its mandated assessment of infrastructure for over a decade

9. Emergency and police services already have a problem negotiating Western Avenue when traffic is heavy. They often can't get through. This will also make this problem worse not only during construction, but after it is built. If the Fire Department response times are inadequate now given budget restraints, how will this help?

10. The fact that noxious fumes are emitted occasionally from the Defense Fuel Supply Point located next to the property is of particular concern as there is no plan to curtail them. That fact was made clear by the federal government when the property was originally sold.

11. The community is now planned to be gated which was an option that was rejected by the Ponte Vista committee set up by former Councilwoman Janice Hahn to review the first plan of 2300 units. Gated communities are exclusionary not inclusionary and despite there being a few built in San Pedro quite a few years ago, they are not in keeping with the nature of most of San Pedro. Who are they trying to keep out anyway?



## KEEP THE PROPERTY R-1

Thank you,

Kathi Moen

From: **Brent Morgan** <[brentamorgan@hotmail.com](mailto:brentamorgan@hotmail.com)>  
Date: Mon, Jan 7, 2013 at 4:17 PM  
Subject: Comments on DEIR for Ponte Vista project  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: Lacombe <[chateau4us@att.net](mailto:chateau4us@att.net)>, Mark Hamburg <[markhamburg@sbcglobal.net](mailto:markhamburg@sbcglobal.net)>

I'm writing to state that I am opposed to the very high densities that are proposed and am in favor of option A as set forth in the DEIR, "No Project Alternative/No Development". Instead of development, a purchaser should be sought who will hold the land in trust and preserved as open space. The Trust for Public Land and the Palos Verdes Land Conservancy are two entities who do exactly that.

B151-1

The DEIR identifies "245 vacant residential units" to be demolished. It is not prominently stated that these are each half of a duplex (two are typical per existing lot) which means that about 120 lots are currently proposed for redevelopment. Comparison between the DEIR minimum proposed development (Option B) of 385 single family homes is most accurately compared to the existing 114 lots. Option B proposes three times the number of units that already exist! This is indeed a high density and the even higher densities that are proposed in Options C and D seem even more preposterously high.

B151-2

The proposed project fails to meet minimum safe distance requirements to local fire stations. Simply citing an existing mutual aid agreement between LA County and the City of LA does not provide sufficient mitigation for this safety lapse. Table IV.M-1 lists LA City Fire Stations that could serve the project. The nearest one is said to be only two miles driving distance, but Google maps suggests that the distance exceeds three miles. The nearest LA County fire stations are said to be within a two mile distance, but this also appears to be misleading. While they may be within a two mile radius as the crow flies, they are not within a two mile driving distance. LACFD #83 is located in the Miraleste neighborhood, which Google says is more than 3 miles driving distance away. If these distances are misstated, how many other points of information in the DEIR are also unreliable?

B151-3

At the highest proposed density levels, the DEIR states that 8,609 residents would be associated with the project. At this highest population density the proposal is for only a 2.8 acre public park and at lower density levels, the proposal threatens that there would be no park at all. The proposed park does not meet city guidelines which are stated in the DEIR: "...neighborhood parks should be provided at a minimum of two acres per 1,000 residents, be five to 10 acres in size, have a service radius of approximately one-half mile, and be pedestrian-accessible without crossing a major arterial street or highway/freeway." Implicit in the portions of the DEIR that I have read thus far is that the general public will not have access to internal open space and trail facilities that are proposed, despite the high value to project residents and to the larger community of well-connected pedestrian trails. Self-contained trails within the proposed development provide little benefit for the community compared to well-connected trails.

B151-4

Brent Morgan

28110 S. Montereina Dr  
Rancho Palos Verdes, CA 90275

From: <[Vholmes11@aol.com](mailto:Vholmes11@aol.com)>  
Date: Mon, Jan 7, 2013 at 4:20 PM  
Subject: Ponte vista project  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

I live close to the proposed Ponte Vista project. Please keep R1 zoning.

We already have several apartments, a strip mall, and town homes, 2 high schools and college dormitories. Western is hard to drive through--please don't add to the problem. Nothing could make it easier--changing the zoning would make traffic unbearable.

B152-1

Please keep R1 zoning.

Vivian Holmes  
26902 Circle Verde Drive  
Rancho Palos Verdes, 90275

From: [det310@juno.com](mailto:det310@juno.com) <[det310@juno.com](mailto:det310@juno.com)>

Date: Sat, Jan 5, 2013 at 4:12 PM

Subject: DEIR No. ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Dear Ms. Sterlich:

I am the president of the San Pedro Peninsula Homeowners United, Inc. I also serve as a member of the Northwest San Pedro Neighborhood Council Committee that reviewed and formulated the comments regarding the Ponte Vista DEIR.

This is to serve as notice that SPPHU is formally adopting and signing on to the NWSPNC comment letter to the Ponte Vista DEIR.

Chuck Hart, President, San Pedro Peninsula Homeowners United, Inc.

B153-1

From: **b.camp** <[b.camp@cox.net](mailto:b.camp@cox.net)>  
Date: Mon, Jan 7, 2013 at 5:10 PM  
Subject: EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Erin,

I currently am serving as a city councilman for Rancho Palos Verdes located just adjacent to the proposed Ponte Vista project. I apologize for not getting my comments in prior to the 4 p.m. public deadline today because of my travel schedule and an email problem.

I would like to include my comments in regards to being in agreement with the letter submittal from Ms Gunter regarding the hazards related to the LPG tanks on Gaffey street as well as other interested residents such as the Sattlers and our city of Rancho Palos Verdes own input from our professional staff.

B154-1

Best regards,

Brian Campbell  
Rancho Palos Verdes city councilman

Sent from my Verizon Wireless 4G LTE Smartphone

From: **Paola** <[terzoli@yahoo.com](mailto:terzoli@yahoo.com)>  
Date: Mon, Jan 7, 2013 at 6:23 PM  
Subject: Ponte vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

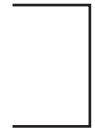
Dear Ms Strelich,

Please keep the development r1. Our community cannot absorb the impact.

Thank you for your time.

Sincerely,

Paola Terzoli  
27669 Eldena Dr  
RPV, CA. 90275



B155-1

From: **Tim Schoen** <[schoen6640@gmail.com](mailto:schoen6640@gmail.com)>  
Date: Mon, Jan 7, 2013 at 7:50 PM  
Subject: Ponte Vista  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Ms. Strelich,

I am writing to support alternative A of the DEIR, keeping the Ponte Vista development project zoned R1 or no project. The current proposed 1135 unit project would have severely negative impacts to the environment, congestion and the quality of life in northwest San Pedro and the east view portion of Rancho Palos Verdes. Again, please pursue alternative A of the DEIR.

B156-1

Sincerely,

Tim and Sara Schoen  
1927 Valleta Dr.  
RPV, CA 90275



From: **dale Abrahams** <[dabrahams2@roadrunner.com](mailto:dabrahams2@roadrunner.com)>

Date: Mon, Jan 7, 2013 at 9:41 PM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Cc: [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

City of Los Angeles Planning Department,

Thank you for the effort that was expended on the DEIR to investigate the impacts that this project may have on the surrounding communities. The conclusions from the studies seem to indicate that the lower the density of housing that is allowed the less impact on the surrounding community. The area currently is zoned R1 and would require either rezoning or some exception based exemption like a CUP to allow for any other type of development as proposed in Alternate C -830 units or D – 1135 units. Alternate B with 385 single family dwellings seems to fit the existing zoning and has the least impact of the surrounding communities. Based solely on impact and the EIR this would seem to be the most logical choice. The preferred (recommended???) alternative (C ) with 830 units would require changes to zoning and also require mitigation measures for traffic (intersection improvements) to be implemented. I would like to understand the motivation for the city to approve a plan going forward with either Alternate C or D? Is there a foreseen housing shortage for multi-unit dwellings in the area? Will there be some extra revenues generated for the city that offsets the impacts to the surrounding community? It does not seem that the EIR sufficiently explored the lifecycle impact on the infrastructure of the surrounding area. The degradation of roads from extra usage, the emissions and the utility use is not just a capacity issue but also will shorten the useable life of the existing facilities. And this is assuming the mitigation measures that are installed with the new housing are maintained or improved upon over the life of the development. We already live in a metropolitan area that is heavily developed. Is this the best use for this property?

Single family dwellings promote a sense of ownership and cohesive community that cannot be matched in mixed units.

Thank you for your consideration of the alternative that would best fit the character of the surrounding communities.

Yours sincerely,

Dale Abrahams

26233 Senator Avenue

Harbor City

B157-1

From: **William Pawlak** <[billnmarge@sbcglobal.net](mailto:billnmarge@sbcglobal.net)>  
Date: Tue, Jan 8, 2013 at 9:44 AM  
Subject: Ponte Vista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org), [councilmember.buscaino@lacity.org](mailto:councilmember.buscaino@lacity.org)

With respect to proposed development at Ponte Vista, we urge that the development be kept at R1, as it currently stands.

We live across the street from Ponte Vista. We and our neighbors with whom we discuss the subject are very concerned about the issue, and we are all in favor of maintaining the neighborhood atmosphere that will be lost if the zoning is changed and a multitude of non-R1 structures is introduced, along with the unbearable and thoroughly unacceptable additional traffic that it would create on Western Avenue and other local streets.

Thank you for your understanding and consideration,

Bill and Marge Pawlak

B158-1



# San Pedro Peninsula Homeowners United, Inc.

Post Office Box 6455, San Pedro, CA 90734

January 3, 2013

Ms. Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strellich:

Ref: DEIR No. ENV-2005-4516-EIR – State Clearing House #2010101082

### Ponte Vista DEIR Hazardous Materials Comments

On behalf of the San Pedro Peninsula Homeowners United, Inc., I wish to submit comments regarding the Ponte Vista Development Project DEIR. San Pedro Peninsula Homeowners United has been aware of the extreme hazard that the Rancho LPG facility, in particular, represents to our community. More population to this area will only add to the potential for a very catastrophic event because of the extreme volatility of LPG. The impact of the LPG facilities should be considered very significant. The Draft EIR conclusions are based on misleading facts.

B159-1

In June of 1999, the Tosco Refinery Co., now referred to in the DEIR as ConocoPhillips, published their Butane Risk Management Plan formulated on the EPA regulations then in place. Those regulations required that a worst-case release assume that everything in their refrigerated 5,092,000 gallon tank is released instantaneously, that safety measures were not considered and that the butane complete vaporizes and explodes. Their calculations estimated a potential endpoint impact of 2.3 miles, which is well beyond the distance of the Ponte Vista site.

The Cornerstone Technologies Risk Analysis of Rancho dated September 2010, presents a similar scenario for only one tank, or 63,000,000 pounds of butane that would have an impact of 3.2 miles. Again, well past the distance of the Ponte Vista site. The DEIR considers the Cornerstone report as 'unrepresentative' and therefore concludes that there is no impact to the project. How can Rancho only claim a one-half mile worst case endpoint and the Ponte Vista DEIR justify considering the impact of these facilities less than significant? Because the EPA regulatory guidelines for reporting how a worst case release was to be calculated were changed stemming from a lawsuit against the EPA by the American Petroleum Institute. The new regulations allowed safety and passive mitigation measures, such as impound basins to enter the equation and only the amount of butane that would evaporate in 10 minutes had to be calculated into the worst case release scenario. Further, that any release model could be used. Thus, the 10 minute leak from a limited size break used by Rancho rather than a total release. These new EPA regulations were released in 1999 after Tosco Refinery had already published their public relations RMP Butane worst case document.

B159-2

Why does it take a lawsuit or catastrophic event to get the attention of those we elect and have the power to regulate to become more proactive?

In 1972, when the 'Petrolane' LPG facility, now Rancho, was built, it was done without permit and little regulatory oversight. Little was known about the hazardous nature of LPG.

B159-3

The City acknowledges they allowed this LPG facility to be built without permits.



Comment Letter No. B159 (Cont)

The City acknowledges that LPG is too hazardous to be shipped through the Port.

The City is aware that Rancho LPG is adjacent to the Palos Verdes Fault and in a rupture zone.

The City is aware that when the tanks were constructed they were not built to withstand the current 7.3 magnitude earthquake, now predicted for the Palos Verdes Fault and that it is considered to be an active fault.

The City is aware of the potential hazard the Rancho LPG represents to the existing community, yet it is considering permitting thousands more potential victims to be exposed to this hazard at Ponte Vista.

The City is aware that the Rancho LPG facility would not be permitted close to a residential neighborhood today.

The City is aware that no matter the degree of probability for disaster, by accident, intentional or natural causes, such an event is possible and the probability factor becomes more likely as time passes and cannot be eliminated as long as the Rancho facility exists.

The City is aware by permitting the Ponte Vista Project, they are a willing partner to the consequences of their decision.

Therefore, it is reasonably prudent for the City to pass a decent Risk Management Ordinance, similar to the law enacted by Contra Costa Co. The hazards that Rancho represents to Ponte Vista and our communities are very real and as a mitigation measure the City should require Rancho to provide an adequate amount of insurance protection for the City and its residents encompassed within the endpoint of an actual worst possible release scenario stemming from an incident at these facilities.

As the Lead Agency, the City should also consider a no-project alternative or at least take steps to minimize the number of potential victims by considering an alternative R-1 project with park space.

The R-1 alternative and the hazards from these facilities were not adequately analyzed in the DEIR.

*This is important because any one of the Projects significant unavoidable impacts would require disapproval of the applicants' project unless there are no feasible mitigation measures or alternatives, and specific benefits outweigh the significant impact (Pub. Resources Code 21081). The California Environmental Quality Act requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects (Pub. Resources Code 21002: Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41). The adoption of a less damaging feasible alternative is the equivalent of the adoption of feasible mitigation (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal. 3d 376, 403). We note that such a mitigation must be adopted by the Lead Agency unless the Lead Agency can demonstrate that the mitigation is truly infeasible (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal. 4th 341, 368).*



B159-3  
(Cont)

B159-4

B159-5

Respectively submitted,

Chuck Hart, President  
San Pedro Peninsula Homeowners United, Inc.

Cc: Joe Buscaino, Councilman 15<sup>th</sup> District



# San Pedro Peninsula Homeowners United, Inc.

Post Office Box 6455, San Pedro, CA 90734

January 3, 2013

Ms. Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strellich:

Re: DEIR No. ENV-2005-4516-EIR – State Clearing House #2010101082

Ponte Vista DEIR R-1 Comments

On behalf of the San Pedro Peninsula Homeowners United, Inc., I wish to submit comments regarding the Ponte Vista Development project DEIR. San Pedro Peninsula Homeowners United, Inc, remains overwhelming in favor of supporting a R-1 alternative project for the Ponte Vista site that is consistent with 5,000 square foot lots. We represent more than 1350 R-1 property owners as well as residents in The Gardens. Our membership lives within the area bordered by Palos Verdes Drive North, Gaffey Street, Channel Street and Western Avenue.

Although the Proposed Ponte Vista project is currently located within the Wilmington-Harbor Community Plan, it is the San Pedro and Rancho Palos Verdes residents that will be the most impacted by the project. Hundreds of acres of open space and refineries separate the Ponte Vista site from the Harbor City-Wilmington Communities. Traffic issues will be their major concern while San Pedro and RPV will have to deal with all of the consequences. Every day, they will live, breathe and experience the impacts of overdevelopment and poor planning.

It is unfortunate that the Planning Department seems determined to try to meet the goals, objectives and policies of the City's General Plan by considering a project that will overwhelm the areas infrastructure and public services, making the Harbor Area a less desirable place to live. R-1 zoning and singular family residences are the soul of our family-oriented San Pedro community. The roots of its citizens run deep, with a proud heritage and spirit to improve their community. Families are born, live and die here. That is why it is important for the City to hear their voice regarding what the Ponte Vista development should become. We are an active family-oriented community used to having family gatherings in our backyards. None of the current plans for Ponte Vista are conducive to a San Pedro lifestyle. Our children are forced from this town and required to move away from their families to find R-1 living.

B159-6

Currently about 60% of San Pedro is multi-family housing. This is inconsistent with Land-Use Policy 1-1.5 which states 67% of land use should be maintained for single family. The DEIR (IV.M-24) Cumulative residential projects in the City indicates 2,195 new residential units of which only 84 (3.8%) are single family. Approval of this project would exacerbate that imbalance as none would be zoned R-1. 'One size does not fit all' when it comes to community planning. The Ponte Vista community should fit into and improve the existing community and enhance it. The proposed plans for Ponte Vista do exactly the opposite.

The justification for multi-family housing types is erroneous. The surrounding area is not all multi-story, multi-family housing. There is a glut of such housing on the market in San Pedro, some of it immediately south of the project. While some of the condo projects built in the last five years are occupied, they are rental units because the developers cannot sell them. Single-family housing is the housing type in greatest demand. The potential positive impacts generated by a new R-1 development at Ponte Vista will greatly enhance the opportunity for the successful renaissance of the downtown area by attracting people to the area that are willing and able to invest there. The

B159-7



project proposed by the developer will severely undercut the San Pedro community plan which emphasizes the rebuilding of downtown San Pedro.

It is obvious that I-Star has dug itself into a financially difficult situation and understandably is trying desperately to make the most of it. But they bought in knowing the property is zoned R-1. They also knew it would be tempting for the Planning Department to try to solve L.A.'s housing issues on this rare 61 acre opportunity. I-Star's problem should not play a factor in what is approved for Ponte Vista. Neither can Los Angeles housing issues be solved by approving a project that will result in detracting from the existing community and surrounding neighborhoods.

The closest R-1 neighborhood to the Ponte Vista site in the City of L.A. is the Rolling Hills Highlands tract which was built in the early 60's. It is separated from the Ponte Vista site by the Mary Star High School Campus and several multi-family projects including the 1,078 unit Gardens townhomes, the 62 unit Tennis Court apartments, the 130 unit Casa Verde condos and the 136 unit Seaport Homes Apartments, which originally intended to be sold as Condos.

A modern R-1 development is what this community wants and needs to keep current families together and to attract new families that will support the revitalization of downtown including the Port related improvements to San Pedro. R-1 would also have the least impact to our environment and the City's already overburdened infrastructure and public services.

Project Alternative:

The DEIR should analyze at least one additional alternative that better addresses the environmental impacts of the project. We suggest a project alternative that includes ingress and egress to Mary Star from Western Avenue, true R-1 single-family homes and a 6 acre park.

*As the Lead Agency, the City could also consider a no-project alternative and develop it for recreation or consider an alternative R-1 project with park space. The R-1 alternative was not adequately analyzed in the DEIR. This is important because any one of the Projects significant unavoidable impacts would require disapproval of the applicants' project unless there are no feasible mitigation measures or alternatives, and specific benefits outweigh the significant impact (Pub. Resources Code 21081). The California Environmental Quality Act requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects (Pub. Resources Code 21002: Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41). The adoption of a less damaging feasible alternative is the equivalent of the adoption of feasible mitigation (Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal. 3d 376, 403). We note that such a mitigation must be adopted by the Lead Agency unless the Lead Agency can demonstrate that the mitigation is truly infeasible (City of Marina v. Board of Trustees of the California State University (2006) 39 Cal. 4th 341, 368).*

Respectively Submitted,



Chuck Hart, President – SPPHU

Cc: Joe Buscaino, Councilman 15<sup>th</sup> District



B159-7  
(Cont)

B159-8

Comment Letter No. B159 (Cont)

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Fax: (213) 978-1343  
erin.strellich@lacity.org

**VIA FAX and email attachment**

**This fax transmittal is a duplicate backup to the comment letter previously sent as an email attachment.**

Re: Draft Environmental Impact Report (DEIR) Ponte Vista Project, No. Env-2005-4516-EIR

Dear Ms. Strellich:

Please find attached Sierra Club comments on the DEIR for the proposed Ponte Vista Project.

Alfred Sattler  
Chair  
Palos Verdes-South Bay Regional Group  
Sierra Club



**SIERRA CLUB**  
FOUNDED 1892

**Palos Verdes - South Bay Group / Angeles Chapter**

January 7, 2013

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
Fax: (213) 978-1343  
erin.strellich@lacity.org

Re: Draft Environmental Impact Report (DEIR) Ponte Vista Project, No. Env-2005-4516-EIR

Dear Ms. Strellich:

The Sierra Club finds the above-referenced Draft EIR to be seriously flawed and recommends that the DEIR for the Ponte Vista project not be approved.

The Sierra Club is opposed to the removal of the OS-1XL designation for Open Space on the project site.

The Sierra Club is also opposed to any increase in the existing R1-1XL housing density on the project site.

The DEIR purports to be using an environmentally sound principle of concentrating development in urban centers as a justification to significantly increase the zoning density of the Ponte Vista project. While Sierra Club policy does support compact development within appropriate existing urban centers as a planning tool to avoid urban sprawl that paves over natural areas, Sierra Club policy cannot be used to justify approval of an increase in development density in an area already characterized by highly congested and often gridlocked roadways as is the case along the Western Avenue corridor in San Pedro and Rancho Palos Verdes.

Barring the establishment of public transportation options that would be likely to reduce the traffic volume along this corridor, the Sierra Club cannot support an increase in zoning density in this area and therefore opposes the proposed Ponte Vista Project of 1,135 units. For the same reason, the Club opposes Project Alternatives C (830 units) and D (1,135 units).

The Sierra Club also is opposed to Alternative B (385 units) because it would not comply with the existing OS-1XL Open Space designation.

The Conceptual Site Plan for Alternative B shows a stair-stepped diagonal configuration, presumably located on the earthquake setback zone, which is labeled as "open space". This

**P.O. Box 2464 • Palos Verdes Peninsula, California 90274**



area is not as large as the currently zoned OS-1XL area, nor is it in a location contiguous with the DFSP native habitat area. Therefore the location shown is of far less potential habitat value than the existing zoned area.

Should the applicant wish to relocate the OS-1XL area on the project site, a preferred alternative would be to restore 9.1 acres including the remnant riparian area in the southwest corner of the site.

While the area is not in its natural state and may currently have limited native flora and fauna, it has the potential to be restored with riparian and other native vegetation that may attract the PV blue butterfly and the California Gnatcatcher, particularly given the parcel's proximity to the Defense Fuel Supply Point. The DFSP provides a relatively small patch of habitat for the threatened Palos Verdes blue butterfly, a species rediscovered there in 1994 after it was thought to be extinct. Expanding the butterfly's host plant restoration into the Project area would enhance the potential to grow this species population thereby improving the possibility for long-term success.

Given the project proposal and Alternatives provided, the Sierra Club can only support Alternative A—no development—which offers community and environmental benefits that the Sierra Club does support.

Sincerely,



Alfred Sattler

Chair

Palos Verdes-South Bay Regional Group



December 30, 2012

2072 Glentree Dr  
Lomita, CA 90717

RECEIVED  
CITY OF LOS ANGELES

JAN 04 2013

ENVIRONMENTAL  
UNIT

Erin Strellich, Planning Asst  
LA Dept of City Planning  
200 N Spring St, Rm 750  
Los Angeles, CA 90012

Subject: Comment to Ponte Vista Project DEIR

Dear Ms. Strellich,

I am a resident of the Lomita Pines and I am very concerned about the Ponte Vista DEIR staff recommendation. Traffic is already horrendous in the mornings and afternoons/early evenings along Western Ave, Palos Verdes Dr N and the Pacific Coast Hwy. I feel a large development project with entrances and exits solely onto Western Avenue will adversely affect traffic on these main thoroughfares. I feel 263<sup>rd</sup> & 262<sup>nd</sup> Streets will also see an increase in traffic. These two neighborhood streets are already well used to avoid the Western/PCH intersection – the Ponte Vista project traffic study needs to propose reasonable mitigation to the traffic increase on 263<sup>rd</sup> & 262<sup>nd</sup> Streets. Note also that 263<sup>rd</sup> Street does not have sidewalks – there are many dog walkers in my neighborhood, and I fear for their safety.

B160-1

With Regards,



Yoshiko Kurata



## Erin Strellich

Planning Assistant | EIR Unit  
City of LA | Dept of City Planning  
200 N. Spring St, Rm 750  
Los Angeles, CA 90012  
Mailstop 395  
P: (213) 978-1351  
F: (213) 978-1343  
[erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)

"How inappropriate to call this planet Earth when it is clearly Ocean."

— *Arthur C. Clarke*

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

From: **Richard Welsh** <[rwinsurance@yahoo.com](mailto:rwinsurance@yahoo.com)>  
Date: Sun, Jan 6, 2013 at 10:55 PM  
Subject: ENV-2005-4516-EIR  
To: "[erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)" <[erin.strellich@lacity.org](mailto:erin.strellich@lacity.org)>

Greetings,

I wish to express my support for keeping the Ponte Vista project under the single family R-1 designation. The traffic on Western Ave is already to the bursting point and adding multi family units is simply irresponsible planning. Thank you.

B161-1

Regards,

Richard Welsh  
1816 S. Anchovy Ave  
San Pedro, CA 90732  
cell [310-729-0087](tel:310-729-0087)

From: **Bizhan Khaleeli** <[bkhaleeli@yahoo.com](mailto:bkhaleeli@yahoo.com)>  
Date: Mon, Jan 7, 2013 at 12:46 AM  
Subject: Ponte vista: single family use only  
To: "[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)" <[erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)>

Dear Erin,  
this email is in regards to the proposed development at Ponte Vista.

Single Family Zone: The property must remain zoned Single Family only. It is disingenuous of the owner to have purchased property zoned for one purpose only to immediately propose a more intensive use. It is also disingenuous to overdevelop for mere profit at the expense of the surrounding community.

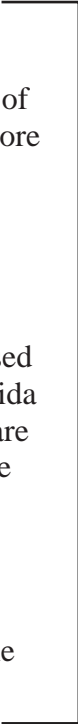
Alternate B: No Project Alternative/Single Family Homes only.

Traffic: The traffic along Western Avenue in the area is already saturated, and with the proposed overdevelopment it would become gridlocked. The intersection at Western Avenue and Avenida Aprenda will become especially dangerous with the drastic increase in use. In addition there are no transportation alternatives in the area such as light rail, arterial roads or shuttle service. The bus service is especially pathetic.

Amenities: The area and specific design proposal lacks the public amenities and infrastructure for redevelopment of single family homes, let alone overdevelopment with multifamily residences. There is a lack of public open space, libraries, parks and mass transit to support the massive increase in population in the area.

Thank you,

Bizhan Khaleeli  
Homeowner  
27823 South Monterey Drive  
Rancho Palos Verdes  
California, 90275



B162-1

From: **Bob Burchett** <[Bob.Burchett@eeontheweb.com](mailto:Bob.Burchett@eeontheweb.com)>  
Date: Sun, Jan 6, 2013 at 11:30 PM  
Subject: PonteVista ENV-2005-4516-EIR  
To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)  
Cc: [donna.littlejohn@dailybreeze.com](mailto:donna.littlejohn@dailybreeze.com), [Board@nwsanpedro.org](mailto:Board@nwsanpedro.org)

**Hello and thank you for reading my proposal where I openly state that PonteVista needs to be 2500+ homes and I live “next door”.**

**Consider the bad news first:** PonteVista can’t be even 300 homes if YOU DON’T SOLVE 100% OF THE PROBLEMS completely since the outdated infrastructure won’t support even that size...let alone 1000 homes. The Navy residential property was built so long ago that the area had little traffic, no real load on the system and it survived for a long time due to the rudimentary lifestyle that wasn’t grown up to the point it is today. Those days are GONE and it is important to take that into account NOW. No EIR is complete without realizing that if you ignore history you are doomed to repeat the mistakes. No one wants to do that.

The sewage, storm drainage, water, gas, telephone, electric, transportation, etc. infrastructure are all now well over 70 years old and deteriorating rapidly. Each year something else breaks again causing Western Ave. to be another disaster area over and over. Some of the construction/ repair/ rework goes on to this day at Avenida Aprenda which seems to be perpetually re-re-worked to patch up the crisis. Don’t believe me go and LOOK as I pass them and see that the contractors have been there literally for YEARS.

Adding a stripped down Ponte Vista loading to this crippled heap of crumbling ruin will insure failure and collapse. Do NOT build anything without solving the underlying problems or face catastrophic infrastructure collapse.

WORSE: By just forcing another “big nasty real estate company” to go bankrupt (think Robert Bisno and Credit Suisse here) by lowering the bar to the ground with only a few hundred unprofitable and unsalable pathetic homes will only insure insolvency and further perpetual blight on Western Avenue as 60+ acres of garbage rots away while awaiting a real SOLUTION as the contractors go away unpaid and the developers seek yet more funding in a weak market. Do we really want to keep repeating failure? I think not.

B163-1

B163-2

**The good news:** You CAN resolve the problems but not piecemeal and NOT by just making 800 or 900 non-profitable loser homes that insure the collapse of the gas, water, transport and other basics that the area will not tolerate...SOLVE all of them or just have the city buy it and make it into a park.

**The SOLUTION:** For YEARS I have been contacting developers going back to Bisno's days; and today I hope one of you will listen to the REAL way this must be handled and that is wholesale as a single issue; not a politically motivated appease-the-crowd band-aid. I have the answers and now is the time to make this work. We only get one chance to do it right.

I sent this to Joe Buscaino and many others to no avail; now it is YOUR turn to either ignore the facts or make me PROVE what I say is true. Please read the attached proposal and give it the consideration that it is due as recapped in the letter below.

B163-2  
(Cont)

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**From:** Bob Burchett [mailto:[Bob.Burchett@EEonTheWeb.com](mailto:Bob.Burchett@EEonTheWeb.com)]  
**Sent:** Monday, February 06, 2012 11:13 AM  
**To:** [gordon.teuber@lacity.org](mailto:gordon.teuber@lacity.org)  
**Cc:** [sandra.ciaramitaro@lacity.org](mailto:sandra.ciaramitaro@lacity.org)  
**Subject:** Letter regarding Ponte Vista  
**Importance:** High

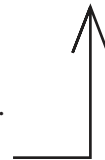
Greetings;

My name is Bob Burchett and I live adjacent to the Ponte Vista project. I am as concerned as everyone else with the issues the ex-Navy property faces when developed but unlike the others I have SOLUTIONS. We are all sick of the eyecore that has been created by no one coming up with ANSWERS. Now is the time.

Please read the attached letter; it is very short (yes; engineers listen too...) but I can tell you the proverbial 'how to build the clock' so that the end result is well over the top in environmentally friendly results. This is exactly what is needed for a real blueprint to success.

B163-3

Give it a moment of your time; then call me and challenge me to prove what I say.

 B163-3  
(Cont)

Best regards;

Robert L. "Bob" Burchett

Certified Communications Engineer

Enterprise Electronics

Contractors License 822372

22826 Mariposa Avenue

Torrance, CA 90502 USA

Phone: [310.534.4456](tel:310.534.4456)

Fax: [310.534.1233](tel:310.534.1233)

Email: [Bob.Burchett@EEonTheWeb.com](mailto:Bob.Burchett@EEonTheWeb.com)

Website: [www.EEonTheWeb.com](http://www.EEonTheWeb.com)

**ROBERT LEE BURCHETT**  
**1633 Caddington Drive**  
**Rancho Palos Verdes, CA 90275**  
**310-534-4456**

Date: February 6, 2012

To: LACITY and Ponte Vista Developers

Attn: Gordon Teuber, Councilman Buscaino and all other interested parties

Re: **PonteVista needs to be 2500+ units**

Yes, I did say that and I live “next door”. Here is how I came to the conclusion and proposed solutions that will make the city fathers **demand** that you build 2500+ units when you are finished with this.

**To get right to the point;** you have to make them all WANT you to build it big and beautiful and we have the technology to do just that today. Further; I will bet you dinner that if you follow 100% of this proposal that you will get both the Presidential Medal of Honor and the key to the city for doing it and more development requests than your company can handle. The text is short and if I don’t capture your attention in a few sentences then toss it in the trash with the other ones.

1. Convert from a “community” to a “CITY” concept by taking everything into account in one plan
2. Make it 100% “green acres” and make it pay its own way; **we already know how to do it:**

- Utilize wind, solar heating and electric power generation for total electric independence
- Double insulate each unit and wrap them in Tyvek for heat capture and cooling efficiency
- Circulate pump hot water from the solar heat system so as not to waste any hot water
- Insulate all pipes everywhere to keep cool water cool and hot water hot
- Install light-sensing/ heat-sensing windows that react to the temperature outside & inside
- Wire all homes for FIBER OPTIC high speed connectivity for Internet, telephone & TV
- Connect with Cox Communications to build you a top class data delivery system for it
- Make tele-commuting a reality for residents to reduce the traffic problems where it can
- Make all appliances Internet connected for management, maintenance & support
- Build a **landfill** and use STI technology for rapid-depletion to generate lots of methane gas
- Use the gas to generate even more electricity so your CITY sells power to Edison
- Use the exhaust stack heat from the turbines to run chillers to cool water and buildings
- Use electric power for heat, cool and induction cooking to cut greenhouse gasses
- Capture all water, runoff, rain, sewage & recycle it (use **George Bush’s** house as a model)
- Run a pipe the short distance from the ocean to an on-premises desalinization plant
- Design all water décor, fountains, etc. to use 100% on-premises recycled water
- Manage all of the greenspace with modern watering systems to minimize evaporation
- Make a deal with Ford to supply their superb Fusion hybrid vehicles for the City

B163-4





- Sell the same vehicles to residents at special rates and mandate 100% conversion to them
- Decree that only hybrid or cars with 35+ MPG be allowed inside the gates
- Provide electric power hookups to recharge the plug-and-drive cars
- Hybrid tram from outside parking to inside units to halt gas consumption even by visitors
- Sell natural gas to vehicles that run on it at your own filling station and make money on it
- Sell hydrogen at cost to Fuel Cell car owners to buy them as they become available
- Operate an on-premises oil change facility that recycles automotive engine oil to make \$\$
- Provide busses and maybe an overhead monorail to move people around the premises
- Create car and vanpool transportation systems to get people to park & ride or rail stations

That was the EASY stuff since the technology is already in place to do everything I just wrote. Now comes the harder part since you MUST have a total plan for the exodus at 7 AM weekdays with the dump onto overcrowded Western Avenue to make us all WANT you here:

- Light rail, monorail, tunnel or bus people to lower parking lots @ Marymount for exit to 5 Points
- Build a route down to Gaffey Street for traffic that can go that way (deal with DFSP for this)
- Monorail to a station at the top of Westmont where a protected lot keeps residents cars safe
- Make a deal with Conoco Phillips to traverse their facility and provide THEIR people with service
- The Westmont lot is adjacent to the 110 Freeway so build new on & off ramps for this lot there
- Provide free shuttle services for LAX and LGB airports so that they never have to drive there
- Connect with the NEW condos just south of PonteVista and offer them transport service too
- Build tunnels & protected 'peplemovers' to the West side of Western for school access

You need all of the public opinion going your way that you can get. So what if the Chamber of Commerce loves you? They don't live next to you; WE do. You need ALL of the people to WANT to sell their condos and move into YOURS and you won't be able to build enough of them when you add in:

- Make a deal with the Albertsons/ RiteAid shopping plaza to connect with them to build support
- Build a Mini-Albertsons inside for the 100 most needed items and free delivery of the rest
- Cox Internet will connect directly with these vendors for instant-ordering and delivery
- Do the same for Rite Aid with their pharmacy services and the other vendors when they sign on
- Do a lot of 1031 exchanges with your own real estate brokerage people so you get trade-in buyers
- Operate your own mortgage lender system like the retirement communities do so you get them IN
- Operate your own alarm company and guard service so that everyone feels safe in their homes
- Wire the senior living with protective devices for fall, no-motion detection and panic buttons
- Provide them with our new personal safety I/O trackers for peace of mind while out and about
- Provide an extensive video surveillance system to insure that no trouble happens in your CITY
- Put in street corner callboxes around the City for people to call for help or to report trouble
- Wire the City for Wi Fi access everywhere in the shops, parks and recreation areas
- Put a dome over ONE field to permit a year-around outdoor recreational facility to really work
- Get Pete Dye to build you a top class golf course with clubhouse and callbox food/ drink ordering
- Put in robot delivery systems for mail and other light goods (yes, these really DO exist now)

B163-4  
(Cont)



OK, you get the idea; if you have read this far then you see the concept and you CAN do this the right way the **first and only time** you will ever get to do it and why not make money along the way?

Call on Los Angeles Community College District for budding talent as well as SCROC, Long Beach State, Dominguez College and El Camino to guest-design and provide instructional/ on-the-job work. Not only will it save you money but it will put your partnering talents on the big city map. Get some time on the Cox local channels to call for talent; they will love you for it. Look up George Bush's house to see it.

You NEED to have them clamoring for MORE units and this is absolutely positively the ONLY way you can design it quietly, reveal it in an explosive public appearance and then get out of the way while they beat the door down to come IN. Note that NONE of this stuff is outlandish, far-fetched, unthinkable or unattainable. All of it is sound business practices that will change you from the most-hated-and-feared to the most-loved in one step. Nothing else can or will do this. Nothing is stronger than public opinion.

**A little about me:** I am a local businessman and inventor by trade, I am an answer-man who finds ways in when everyone else is looking for a way out. It only took me two hours to write up this proposal but you will have 5 years to build it and 50 years of success to show for it.

Sure, my company provides many of the products that I have outlined in the proposal and that is how I know that they work and will do exactly what I say that they will do. I also know the top eco-architect in the business and the man that invented and patented the landfill-reduction technology too. They would both love the opportunity to hook up with you to do this.

Just buy a book at Amazon.com and call in the green experts; we get a new eco-City and **you get all the credit**. Most of the rest is in a book that I bought my eco-crazy niece this past Christmas; she got a lot of things but this \$30 book called "The Real Goods Solar Living Sourcebook - Special 30th Anniversary Edition: The Complete Guide To Renewable Resources" had more between its covers in terms of value to her than all of the rest combined. You can buy this book too, but the trick is to get the eco-geniuses to sign on with you for the thrill and press they will get to build an entire CITY. I bet most of them will work for nearly free just to get their name on the bronze plaque out front and the TV coverage that will come.

So call in your markers, favors and all of your friends. Call on the technology community to make this happen. Bring in the top class horsepower, close the door with this proposal on the table and watch their eyes light up. Make us ALL proud (and a bit envious) to be neighbors of **Ponte Vista Eco-CITY**.

Robert L. (Bob) Burchett  
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 310.534.4456

B163-4  
(Cont)



From: **Mitch Harmatz** <[mitchell.harmatz@gmail.com](mailto:mitchell.harmatz@gmail.com)>

Date: Mon, Jan 7, 2013 at 6:29 AM

Subject: Ponte Vista ENV-2005-4516-EIR

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Ms. Erin Strelich,

As a property and business owner on Western Ave (990 N. Western) I have watched the several design changes, as well as, ownership changes, that have occurred on this project. The new Ponte Vista fits well into our community; it provides needed housing while at the same time blends well into the needs of various sectors of our population without causing major traffic issues. The road to Mary Stat High School is much needed.

B164-1

The projects works with the 1135 units.

Thank you very much.

Mitch Harmatz

Owner of Plaza Automotive Center and Park Plaza Shell since 2001

Resident of San Pedro since 1986.

From: **Kris Kumamoto** <[kris2k@gmail.com](mailto:kris2k@gmail.com)>

Date: Mon, Jan 7, 2013 at 3:33 PM

Subject: Ponte Vista opposition

To: [erin.strelich@lacity.org](mailto:erin.strelich@lacity.org)

Hello Erin,

As a resident of North San Pedro, I just can't believe the density of housing that is being proposed for the Ponte Vista Project. It is so difficult to get in and out of San Pedro along both the Western Ave and Gaffey St. corridors during rush hour that any increase in traffic would be a disaster. Personally, a non-industrial commercial project is preferable but the thought of 18 units per acre is just insane. I am so against this because the density would degrade the quality of life in San Pedro. This is a bad project period.

B165-1

Thanks for your attention.

**Kris Kumamoto**



Cell: [\(310\)529-8574](tel:(310)529-8574)

Office [\(310\)318-9386 x150](tel:(310)318-9386 x150)

Office Direct: [\(424\)212-6750](tel:(424)212-6750)

[Kris2K@gmail.com](mailto:Kris2K@gmail.com)

DRE# 01415568

January 6, 2013

Ms. Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Ms. Strellich:

**RE: DEIR No. ENV-2005-4516-EIR – State Clearing House  
#2010101082  
Ponte Vista Development – San Pedro, CA  
Public Comments on Sections related to Seismic/Geologic Conditions &  
Hazardous Materials**

My comments on this DEIR revolve around the continued denial of extraordinary risk exposure to residents for miles due to the **Ultra Hazardous** “Rancho Liquid Petroleum Gas” storage site located less within ½ to ¾ of a mile from this new proposed housing site. The Ponte Vista DEIR fails to address this undeniable risk.

**Seismic/Geologic Comments**

It is ironic to me that we are sending these comments to your office. The City of Los Angeles Planning Department itself has designated the area of the hazardous Rancho LPG tank storage as an “Earthquake Rupture Zone”. Yet, we find the City of LA advancing this Ponte Vista housing project as if there is no issue of safety to residents present at all. Attached is the appropriate map out of the LA City Planning Department (SAFETYLT ) that identifies the problematic geologic situation. It is important to note that the area of these tanks (*located approximately ½ to ¾ mile from the proposed 1100+ homes*) is where there is a convergence of several earthquake faults, the largest one being the Palos Verdes Fault (mag. 7.3 potential). The DEIR fails to recognize either the LA City Planning Department’s designation of the “Earthquake Rupture Zone” that contains these volatile tanks, or the fact that there an intersection of faults in that area that cause increased seismic concern for the location. The Rancho site is also clearly identified in LA Building and Safety documents as being located in a “Liquefaction Area”, a “Landslide Area”, and a “Methane Zone”. These are all matters that should have provoked a prudent attitude by the City of LA toward public safety due to the hazardous massive volume and extremely volatile nature of liquefied petroleum gas being stored on the adjacent premises. This condition presents a very vulnerable safety environment for all residents both existing and proposed.

The latest geology report commissioned by the EPA dated December 20<sup>th</sup>, 2012 declares and grades the soil of the Rancho LPG facility as “Class D- Stiff Soil”. The following information has been pulled from an Indiana website where they utilized information from the National Earthquake Hazards Reduction Program (NEHRA) that establishes this grade of soil as “Liquefaction Area”.

B166-1

B166-2

**Short description of Class D Stiff Soil:**

Liquefaction Potential of Surficial Materials in Indiana, 2011 (1:500,000) - Shows shows highly generalized categories (low, moderate, and high) of liquefaction potential, based on soil classes of the National Earthquake Hazards Reduction Program (NEHRP). This data set provides a digital coverage of the predicted response of surficial geologic materials in Indiana to liquefaction induced by earthquakes. It is intended to be used by Indiana Department of Homeland Security, emergency planners, and responders on the state and local level as a general reference guide to identify potential areas of evaluated risks of liquefaction. Low liquefaction potential includes NEHRP Soil Class B (consisting of rock: sandstone, limestone, shale). Moderate liquefaction potential includes NEHRP Soil Class C (hard or stiff soil, or gravel) and part of NEHRP Soil Class D (stiff soil, stiff clay, and some gravel). **High liquefaction potential includes parts of NEHRP Soil Class D (stiff soil, stiff clay, and some gravel)**, and all of NEHRP Soil Class E (soft soil and soft to medium clay) and F (lake and river deposits of sand and mud). The following is excerpted from Indiana Geological Survey Miscellaneous Map 81: **'Liquefaction is a common ground-failure hazard associated with earthquakes. It is defined as the sudden and temporary loss of strength of a water-saturated sediment. This could result in the structural failure of buildings, bridges, and other structures.'**

**Tags:**

IndianaMap, IGS, Indiana, geoscientificInformation, geology, surficial geology, quaternary, stratigraphy, earthquake, ground shaking, seismic, soil classification, liquefaction, shear-wave velocity, National Earthquake Hazard Reductions Program (NEHRP)

**Credits:**

National Earthquake Hazard Reductions Program (NEHRP), Federal Emergency Management Agency (FEMA), Indiana Department of Homeland Security (IDHS), Indiana Geological Survey Miscellaneous Map 81 (2011)

**FGDC Metadata:**

[Seismic Earthquake Liquefaction Potential.html](#)

**Download:** Download a zip file that contains an ESRI Shape File and associated metadata:

[Seismic Earthquake Liquefaction Potential.zip](#)

Magnifying the geologic inappropriateness of installing yet more housing to an area already exposed to elevated risk, is the antiquated infrastructure and sub-standard tank construction of the two massive 13 Million Gallon Rancho LPG tanks built to a **seismic sub-standard of only 5.5-6.0** over 40 years ago! These tanks were constructed in 1973 **without benefit of LA Building and Safety permits** which were only “certified” after their construction and while in use. The proximity of the magnitude 7.3 potential PV Fault coupled with the confirmation of the soil as “liquefaction area” at this facility makes any opinion of earthquake *safety* at this site completely reckless and illogical.

The issue of risk to residents and the Port of LA from the Petrolane/Amerigas/ and currently Rancho (Plains All American Pipeline) LPG facility has been raised for literally decades. Both the Port of LA and the LA City Council have gone on record in acknowledging safety concerns and a lack of wisdom in *ever locating* the facility at its current site. In spite of that, the City of LA continues to ignore the threat. Our residents and homeowners are “forced” now to comment on the irresponsible concept of the Ponte Vista housing project in order to protect others. This housing project plans to introduce yet another 2,000+ more potential victims to a certain highly increased exposure to harm.

Also attached to this letter is the recent geology report, from Geotechnologies Inc., referenced above. This EPA hired consultant does not perform their own comprehensive exploration nor physical inspection of geologic conditions at the site. The company simply relies on prior existing information provided by the LPG company’s own consultants and other sources of available information.

B166-2  
(Cont)

However, “Geotechnologies” *did* visit the location for a sight inspection and cited on page 17 of that report that “*the analysis critical for the evaluation of the seismic hazards at the site were not addressed...*”, page 15, “*borings and soil samples near the tanks were never done (particularly as it relates to Lateral Spreading)*”. Also, specifically noted is a potential clear current violation described on page 9 relating to a storm drain below the Rancho tanks, “*no device exists to contain liquid butane (or other released substances) from entering the drain in the event of discharge by the tanks*”. While there are a number of deficiencies obvious in their report due to the limitation of their analysis, Geotechnologies Inc. should be credited for both recognizing and emphasizing the above facts and noting that other critical sites for geologic testing, sampling and study **necessary** to *ensure safety* have **never** been analyzed. The report urges the study of these areas and points out other vulnerabilities of the soils at the storage facility. These deficiencies **all** point to significant safety problems.



B166-2  
(Cont)

Attached you will find graphics along with maps from Cal Trans and the USGS with a Google Earth picture. This helps to show the discrepancy in the location of the Palos Verdes Fault...and how it can be manipulated slightly to whatever result might benefit someone with a an interest in deflecting the truth. According to the “Rancho consultant’s report”, the earthquake fault falls directly under new homes. Who is right or wrong here? It is important to remember that an earthquake fault is not a simple line in the ground...but, the fault’s width itself can, at times, range in size up to 1 mile! The truth is that whatever the case, the entire area of the tanks and vicinity (as seen on the graphics) is either directly on top of , or slightly to one side or the other, of the Palos Verdes Fault. Regardless of the tanks *exact* location upon the fault or along side of it, the structures, tanks, rail cars and whatever happens to be on site during the minutes of significant earthquake, will be incredibly impacted due to landslide and liquefaction of soil. Given the volatility of liquefied petroleum gas, that translates into a cataclysmic event capable of killing thousands.

An issue completely **ignored** in the DEIR for Ponte Vista is the **Tsunami threat**. Due to the close proximity of the LA harbor channel, this area just a few hundred yards away from the harbor, is ripe for the effects of a tsunami. There are two nearby underwater landslide areas that could produce a significant tsunami. Maps will show the area of North Gaffey, just south of Westmont Drive, as being in the designated “**Tsunami Inundation Zone.**” Just *how* a tsunami wave is estimated to stop at that point is difficult to ascertain since there is *no* significant rise in elevation that would prevent invasion of waters. Approximately 1 ½ years ago, (we have photos) there was a sign posted within 200 ft. of the LPG facility that read, “You are now leaving a tsunami zone”. That sign has mysteriously disappeared. The sign base remained until a Rail warning sign was recently posted in the exact same spot after a Rancho LPG rail car collided with a truck in March 2012 miraculously escaping rupture. Apparently, now, it is acknowledged as a potential “rail accident zone.”

B166-3

Also, it appears that the “storm drain” that leads to the directly into the LA Harbor, located right below the LPG tanks, has not been taken into “tsunami consideration”. That storm drain would drive the force of any tsunami wave in the harbor directly up Westmont Drive and all along Gaffey Street. So, there are some critical questions to be raised about effects from tsunami upon local residents including any residents of the proposed Ponte Vista housing development. **The Ponte Vista EIR never responds in any way to a tsunami potential.**

There have been numerous requests by LA City officials and neighboring Rancho Palos Verdes requesting the insurance information of Rancho LPG / Plains All American Pipeline covering this facility. This information is crucial in receiving assurance that there is adequate coverage of liability of harm to affected areas from an event stemming from Rancho LPG. Those requests, thus far, have been denied.

The following is documented in a seismic analysis provided to the EPA in May of 2012 by “Strong Motions” regarding earthquake insurance at Rancho LPG;

*"Plains LPG has provided results of a "desktop" analysis of the earthquake loss. According to this analysis, the "probable maximum loss" is \$8.4 million and the "maximum foreseeable loss" is \$18.6 million. These estimates were based on 250-year MRP ground shaking at the site. These estimates include ONLY the replacement value of the structures (tanks); they do **NOT** include losses from : 1) business interruption; 2) spilled contents; 3) environmental clean -up; 4) fires; 5) explosions; **and 6) third party liability.** Plains LPG maintains earthquake insurance up to \$60 million. It has not been demonstrated that the facility is insured up to the maximum possible earthquake loss."*

B166-4

It is painfully clear that regardless of the precarious nature of the geology of this site and the resulting devastation potential that exists, this Rancho LPG facility (a subsidiary and LLC of Plains All American Pipeline) carries absolutely *no insurance* that would cover the losses to *the public, the City of LA and ( in particular response to this Ponte Vista EIR) the future residents of the Ponte Vista Housing project.* **The developers of Ponte Vista should be active participants along with our community in ensuring safety and protecting their own investment from the risks presented by Rancho LPG.**

## Hazardous Materials Comments

The Ponte Vista DEIR consultant, Mary O’Neil at CAJA Environmental, gives great credibility to the risk analysis from Rancho LPG facility’s consultant “Quest”. Interestingly, there appears to be no real investigative work related to the discrepancies between various consultants in regard to true risk attributed to a catastrophe at Rancho or a resulting “domino effect” disaster due to the **many available fuel resources** in the area. This lack of consideration does not bode well for the potential residents of the Ponte Vista housing project.

*The issue of a “domino effect” of cascading events stemming from Rancho LPG, Conoco Phillips refinery and the Naval Fuel Depot (along with the multitude of marine oil terminals at the Port of Los Angeles) has been identified as a matter of **grave concern** by Professor Bob Bea from Berkeley University. Professor Bea is the renown expert hired by the State & US government to identify the “why” of our greatest recent US catastrophes. From Columbia’s fiery end, the collapse of the levees during Katrina, the Gulf oil disaster and the devastating explosion of San Bruno; all have warranted the expert investigation by Professor Bob Bea. Professor Bea has warned of the potential of extreme danger due to the existence of this Rancho LPG facility and its sheer massive volume of LPG, the facility’s conditions and its close proximity to other hazardous facilities. How many times do we have a valued opinion such as Bea’s **PRIOR** to a catastrophe??!!!! What more will it take to move us to take responsible action to protect the innocent?*

B166-5



In the Ponte Vista EIR analysis, Ms. O’Neil (at CAJA ) also underscored confidence in the EPA solicited report by Dr. Daniel Crowl that buttressed the risk analysis performed by Rancho’s own consultant “Quest” pronouncing *a very minimal zone* of worst case impact. Crowl’s findings were used to give greater credibility to the Quest Risk analysis over the “Cornerstone Technology” analysis commissioned by our local San Pedro Neighborhood Council. The Cornerstone Report gave a worst case blast radius of impact from at 6.8 miles. Dr. Crowl, a “chemical engineer” and instructor at Michigan Tech University presented his report on “Michigan Tech” letterhead *without authorization* of the University. The University has clearly stated that the report is Crowl’s own independent analysis having nothing to do with the University and without their permission. Crowl’s scope of expertise is extremely limited in his analysis of the Rancho situation. His basis for analysis was established entirely on the data provided by others. Crowl never once visited the site. Crowl dismisses the validity of the Cornerstone reporting and endorses the report of the Rancho LPG consultant. The *quality* of Crowl’s report can be gleaned by his assessment that the walls of the “containment basin” at the base of the two large butane tanks will be left entirely unscathed and intact by an earthquake strong enough to rupture a 13 million gallon tank sitting on liquefaction and landslide soil. A curious conclusion at best. But, this example handily illustrates Crowl’s lack of seismic and engineering education. It also reflects the deficiency of study that Ms. O’Neil (CAJA Environmental) performed in her own investigation of the hazard potential for this Ponte Vista EIR.

B166-6

The Ponte Vista consultant blithe fully ignores the flagrant discrepancy in the worst case scenario results between the findings of Rancho LPG and its abutting neighbor Conoco Phillips refinery. The Conoco Phillips refinery, provides a worst case scenario radius of impact from their *own* butane storage ( representing a *fraction* of the volume held at Rancho) at **2.3 miles**. This impact would certainly include the residential area of Ponte Vista. Rancho LPG has disclosed a far *less* radius of impact from worst case scenario with an **end point of .5 mile**. This result is accepted despite Rancho having **over 4 times the volume of butane** at the Rancho facility! The question becomes why the Ponte Vista consultant found “no problem” with this assessment? Certainly, it would be more beneficial to the developer to ignore this serious discrepancy.

B166-7

There continues to be an ignorance of the properties of liquefied petroleum gas and how it differs from other gasses. In **all** risk analyses of Rancho LPG and its predecessors, there is a complete disconnect of understanding when it comes to the value of a “containment basin” for leaking butane gas. The leaking gas is treated as though it will remain in its refrigerated and “cooled” tank liquid condition allowing it to be “contained” by its “one” existing containment basin. That is a ridiculous conclusion since when the liquid gas is exposed to ambient air temperature, it will vaporize and expand over 200 times its volume. Less than 1% of the LPG tanks capacity could *possibly* be “contained”! The gas will seek the lowest levels, (is heavier than air) and will hug the ground until finding any ignition source whatsoever. The spark from a passing car engine could easily ignite the highly flammable gas in an instant. The resulting explosion from this would be massive. Fires from LPG burn hotter than other fuels at over 3500 degrees, igniting and gasifying all other flammables for MILES! This gasification would create a hazardous cloud with a far greater zone of threat than can be imagined.

B166-8

In closing, it is patently immoral to encourage the growth of housing in an area that is already recognized for its elevated jeopardy to disaster. Whether the potential disaster is caused by earthquake, terrorism, antiquated infrastructure or human error, the consequences to human life and property are far too great to escape good conscience.

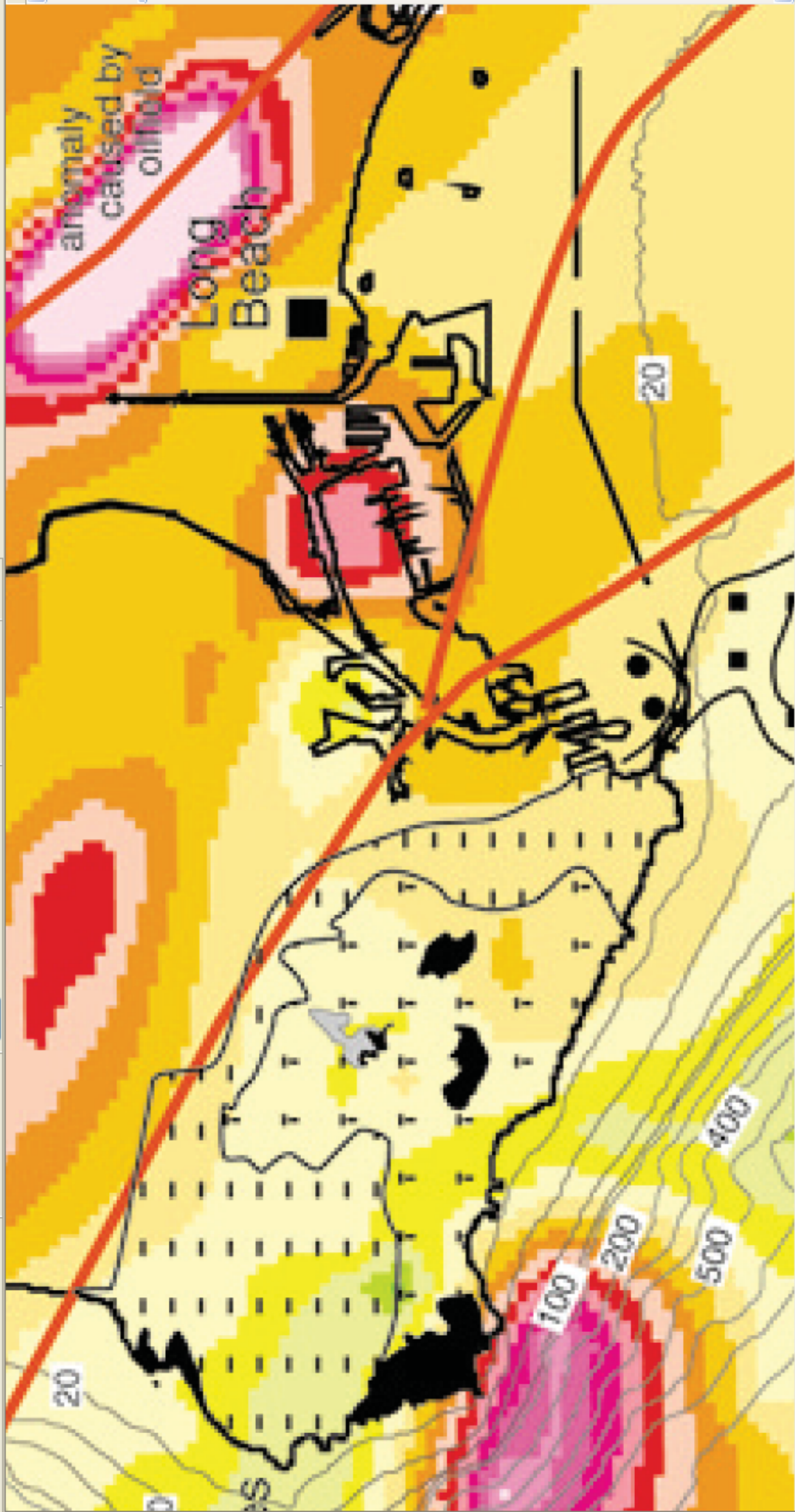
Mitigation that would allow the introduction of this Ponte Vista housing is the removal of the threat causing the increased risk exposure itself. Nothing else justifies gambling with the lives of innocent people. Nothing.

B166-9

Most sincerely,



Janet Schaaf-Gunter



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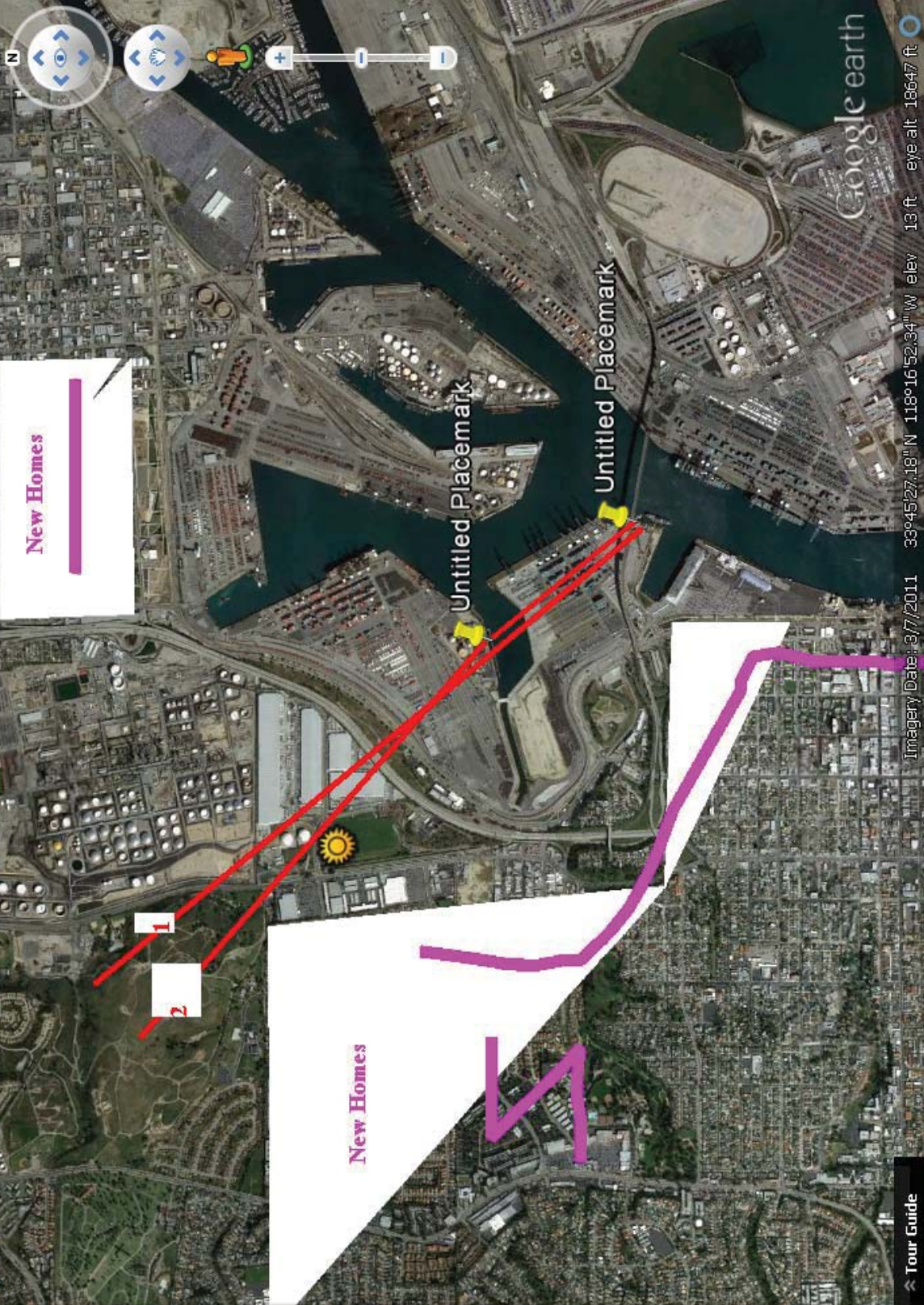
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Sign in

New Homes

New Homes



Tour Guide

Imagery Date: 3/7/2011

33°45'27.18" N 118°16'52.34" W elev 13 ft eye alt 18647 ft



December 20, 2012  
File No. 20278

US EPA Region IX (SFD-9-3)  
75 Hawthorne Street  
San Francisco, California 94105

Attention: Mary Wesling  
EPCRA/RMP Enforcement Coordinator

Subject: Third Party Expert Technical Review  
Seismic Hazards Analysis  
San Pedro Terminal, Rancho LPG, LP.  
2110 North Gaffey Street, San Pedro, California  
SAIC Prime Contract No. #EP-W-09-032

Ladies and Gentlemen:

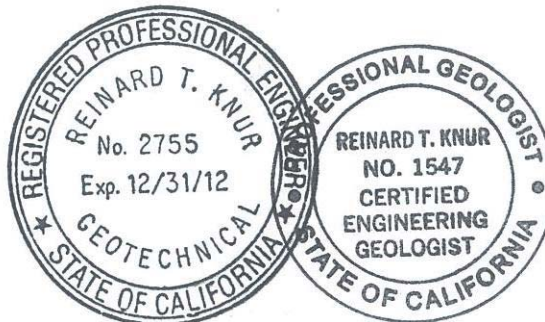
This letter transmits the third party review of the referenced report. This review was performed in order to verify the accuracy and adequacy of the evaluation by GMU dated July 19, 2010. The referenced report was prepared to address geotechnical-related questions posed earlier by the USEPA resulting from a review of a Tank Assessment Report by ABS Consulting. The criteria by which the evaluation by GMU Geotechnical, Inc. was reviewed were those from the Guidance for California Accidental Release Prevention (CalARP) Program Seismic Assessment by the CalARP Program Seismic Guidance Committee dated September 2009.

No new subsurface work was performed by Geotechnologies, Inc. as part of this third party review. A review of published geotechnical-related references for the area was performed as well as a site visit. Separate commentary resulting from these tasks is provided. Geotechnologies, Inc. appreciates the opportunity to provide our services on this project. Should you have any questions please contact this office.

Should you have any questions please contact this office.

Respectfully Submitted,  
GEOTECHNOLOGIES, INC.

  
REINARD T. KNUR  
G.E. 2755, C.E.G. 1547



Distribution: (1) SAIC, Attn: Diane Bodine  
(1) EPA, Attn: Mary Wesling

Email to: [Diane.C.Bodine@SAIC.com], Attn: Diane Bodine  
[Wesling.Mary@epamail.epa.gov], Attn: Mary Wesling

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www.geoteq.com

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**THIRD PARTY TECHNICAL REVIEW**  
**SEISMIC HAZARDS ANALYSIS**  
**SAN PEDRO TERMINAL, RANCHO LPG, LP.**  
**2110 NORTH GAFFEY STREET, SAN PEDRO, CALIFORNIA**

**INTRODUCTION**

This report presents the results of the third party review of the Geotechnical Seismic Evaluation for the Rancho LPG Holding Facility in San Pedro by GMU Geotechnical, Inc. dated July 19, 2010. The purpose of this review was to assess the accuracy and adequacy of the evaluation by GMU Geotechnical, Inc. (GMU). The report by GMU was prepared to address Geotechnical-related questions posed by the USEPA after review of a report “Tank Assessment Report for Compliance with CalARP” by ABS Consulting dated August 17, 2010. Since the initial report by ABS Consulting was prepared for compliance with CalARP, the work by GMU Geotechnical was reviewed in consideration with the objectives outlined by CalARP (California Accidental Release Prevention Program).

The methods and findings by GMU were compared to the geotechnical guidelines found in the CalARP Program Seismic Guidance Committee document, “Guidance for California Accidental Release Prevention Program Seismic Assessment”, dated September 2009. The CalARP guidelines provide for a conservative level of assessment as they apply to the release of regulated substances and potential consequences that may occur in the event of their release. The CalARP guidelines have geographic jurisdiction over the site and were prepared for facilities similar to those found on the subject site. It should be noted that the report by GMU does not refer to or intentionally address the criteria outlined in the CalARP seismic assessment guidance document.

This review included research of published geotechnical documents, and a site reconnaissance. Summaries of the findings from these tasks are provided. No subsurface exploration or testing was performed as part of this review. This report was performed in concert with the Seismic Risk



Review of Plains LPG Facility in San Pedro, California, by Strong Motions, Inc, dated April 17, 2012.

## **BACKGROUND**

The basis for the CalARP Program is summarized in the following statement: “The objective of the California Accidental Release Prevention (CalARP) program seismic assessment is to provide reasonable assurance that the release to Regulated Substances (RS) as listed in California Code of Regulations (CCR) Title 19 Division 2 Chapter 4.5 having offsite consequences (caused by a loss of containment or pressure boundary integrity) would not occur as a result of an earthquake” (CalARP, 1999). The CalARP program guidelines are narrow in scope than those in the California Building Code whose purpose is to “establish the minimum requirements to safeguard the public health, safety and general welfare through structural strength... safety to life and property from fire and other hazards attributed to the built environment...”

The CalARP document “*Guidance for California Accidental Release Prevention (CalARP) Program Seismic Assessments prepared by the CalARP program Seismic Guidance Committee*” (CalARP, 2009), provides criteria for evaluation the geotechnical and seismic aspects of a site. In order to meet the objective that release of regulated substances would not occur as a result of an earthquake, the guidelines provide several performance criteria for structures and systems:

- Maintain structural integrity,
- Maintain position,
- Maintain containment of material and,
- Function immediately following an earthquake.



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Since these criteria are of interest for the on-site structures, the recommendations set forth in the CalARP guidelines should be considered appropriate for the type of facilities constructed on the subject site.

The subject site was developed in the early 1970's, prior to the existence of the CalARP Guidelines. The CalARP guidelines recognize facilities that were constructed to earlier building codes. For facilities that were constructed to the 1985 Uniform Building Code and earlier, the document states "there were no specific seismic code requirements for non-building structures and non-structural components in heavy industrial applications and they were rarely reviewed and inspected by building departments..." Since 1998 the seismic assessment study has been a necessary requirement of the State's CalARP program reports. In general, the performance objectives for new facilities are more restrictive than those for existing facilities. The guidance document recognizes the disparity in design and construction requirements between old and new facilities by suggesting "any regular inspecting and repair of systems containing regulated substances should make them significantly safer than similar systems for which these steps are not taken."

### **SITE DESCRIPTION**

The site is located near the toe of the east side of Palos Verdes Hills at 2110 North Gaffey Street in San Pedro, California. The site is bordered by a petroleum tank farm to the north, warehouses to the east, Westmont Drive to the south, and North Gaffey Street to the west. The site vicinity is developed with a mix of industrial, commercial and residential properties. The site is shown relative to nearby topographic features on the attached Vicinity Map.



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The site was graded and construction commenced in 1971; construction was completed in 1972. Based on photographs provided during the site visit, the site consisted of undeveloped, rolling hills.

Elevations vary from 130 feet above mean sea level (msl) on the east side site of the site to 20 feet above msl on the west side. Grading on the site has resulted in a moderately steep, westerly descending, terraced slope. The slope ranges in elevation from 130 feet to approximately 40 feet for a total height of 90 feet. The slope descends at a 1.5 to 1 gradient between terraces and a 1.75 to 1 gradient average gradient over the entire slope. Graded terraces support several small one structures and one two story structure. Several berms are placed around to deflect and contain liquids in the event of releases and to contain rainfall runoff. The slopes are vegetated with annual grasses. Detailed site topography is shown on the attached Plot Plan 1 and Plot Plan 2.

The site is developed with the following above-ground tanks:

- Two, 13,000,000-gallon refrigerated butane tanks (labeled as T-1 and T-2 on the attached Plot Plans),
- Three, 20,000-gallon propane tanks,
- Three, 20,000-gallon butane tanks,
- One, 3,500-gallon Ethyl Mercaptan tank,
- Two, 127-gallon Accumulators (V-17 and V-28),
- One, 509 cubic foot knock out butane Tank (V-19),
- One truck loading rack and a Railcar Loading Rack.

Due to their large capacity, the two atmospheric, refrigerated butane tanks are the focus of this assessment. The butane tanks are located on two separate, relatively flat terraces at elevation 50 feet (Butane Tank T-1) and 40 feet (Butane Tank T-2). A large, soil-bermed containment basin is located on the west side of the two large butane tanks. The butane tanks are located



approximately 20 feet from the toe of the high westerly-descending slope and approximately 50 feet from the top of the containment basin slope.

The containment basin measures approximately 90 by 160 feet at its base, and is over 20 feet deep with slopes that are inclined at a 1.5 to 1 gradient (horizontal to vertical). The slopes are covered with an asphalt emulsion and the bottom is vegetated with annual grasses. The bottom of the containment area ranged from elevation 20.7 to 24.5 feet.

### **LOCAL GEOLOGY**

The site is located in the San Pedro Hills near the northeast side of Palos Verdes. Palos Verdes is large hill in the Los Angeles Basin that has been uplifted due to compression by nearby faults. The basement rock underlying Palos Verdes is the Catalina Schist and is found at a relatively shallow depth of less than 1 kilometer. Overlying the basement rock are Miocene sedimentary rocks with various Pleistocene-age, poorly-consolidated sediments. The subject site is underlain by Quaternary alluvium, San Pedro Sand and old, uplifted alluvium (Dibblee, 1999). A copy of the geologic map by Dibblee is attached to this letter as "Local Geologic Map (Dibblee, T.W.)". Earlier geologic mapping work by Woodring, Bramlette, and Kew (1946) is attached as "Local Geologic Map (Woodring, W.P., et al)". The map by Woodring, Bramlette, and Kew shows geologic materials of similar composition to those indicated on the geologic map by Dibblee. The map also shows the topography of the site vicinity prior to development.

GMU Geotechnical drilled two borings located at the top of the hill on the east corner of the property and DH-2 located at the toe of the hill between Tanks T-1 and T-2. DH-1 was drilled to 100 feet below the ground surface (bgs). DH-2 was drilled to a depth of 50 feet bgs.



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Review of the boring logs indicate 12 feet of artificial fill at the top of the westerly-descending slope. The fill is composed of poorly graded sand that is damp, dense, massive and has no cementation.

The San Pedro Formation underlies the fill in Boring DH-1 and was identified at the ground surface in DH-2. The San Pedro Formation is described as poorly graded sand that is dense, moist and without cementation. In Boring DH-1, drilled at the top of the slope, silty sand and sandy silt were identified between the depths of 70 to 90 feet bgs, which in turn is underlain by poorly graded sand.

Water was not identified in the 100 foot deep boring, DH-1. The ground surface of this boring was 120 feet, therefore the boring terminates at an elevation of 20 feet above mean sea level. Boring DH-2 was drilled at a surface elevation of 50 feet above mean seal level to a depth of 50 feet bgs. Water was identified at a depth of 37.3 feet bgs which correlates with an elevation of 12.7 feet above mean sea level. Therefore, the water surface is approximately 27.3 and 37.3 feet below the Tanks T-1 and T-2, respectively.

According to Seismic Hazard Zone Report for the Torrance 7.5-Minute Quadrangle (CDMG, 2006), the historically highest groundwater is approximately 10 feet below the ground surface at Gaffey Street. The ground surface elevation of Gaffey Street is near elevation 28 feet above mean sea level, therefore the historically highest groundwater elevation is at 18 feet above msl. Since the water surface is relatively planar and horizontal in the granular San Pedro Formation sand, the historically highest ground water surface can be projected to the containment basin and Tanks T-1 and T-2. The depth to the historically highest groundwater surface beneath these features is summarized in the following table.



<b>Feature</b>	<b>Ground Surface Elevation (feet above msl)</b>	<b>Elevation of Historically Highest Groundwater (feet above msl)</b>	<b>Depth to HHGW (feet bgs)</b>
Tank T-1	50	18	32
Tank-T-2	40	18	22
Containment Basin	23	18	5

**Faults**

The site is not underlain by the surface trace of any known faults. A generalized map showing regional faults is attached as Southern California Fault Map. The Local Geologic Map (Dibblee, T.W.) shows the nearest fault to the subject site is the “inferred position of the Palos Verdes Fault”. This fault is located 400 feet northeast.

An Earthquake Fault Zone is designated if the State of California deems a fault to have a relatively high potential for ground rupture. The criteria for such zoning is if a fault has evidence of surface displacement in the last 11,000 years (sufficiently active) and if the fault trace is clearly detectable by a trained geologist as a physical feature (well defined). The Palos Verdes Fault has not been designated by the California Geological Survey (CGS) with an Earthquake Fault Zone (Hart and Bryant, 2008).

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially active” faults utilizing the same aging criteria as that used by California Geological Survey (CGS). However, established state policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years. It is this recency of fault movement that the CGS considers as a characteristic for faults that have a relatively high potential for ground rupture in the future.



The Palos Verdes Fault is considered to have been active in Holocene time (last 11,000 years). The fault is oriented in a northwest-southeast direction and has a left-lateral, strike-slip motion. Recent work suggests that the fault has slip rate of 2.7 to 3.0 mm/yr. and is capable of an  $M_w$  event of 7.0 to 7.2 at an interval of 400 to 900 years (McNeilan, T.W., et. al, 1995).

The nearest CGS-designated Earthquake Fault Zone is for the Newport Inglewood Fault, located 6.6 miles to the northeast. A map showing the site location relative to the nearest Earthquake Fault zone is attached to this letter as “Earthquake Fault Zone Map”.

### **SITE VISIT**

A site visit was performed on February 10, 2012 to observe the site conditions and meet with the facility operators. The site visit consisted of a walk-through of the entire facility, including the top of the eastern slope, the bottom of the containment basin, as well as review of construction documents and photos available in the office. The purpose of the site visit was to observe geotechnical-related issues such as the conditions of slopes, indications of settlement or instability at the ground surface, the condition of observable of footings, drainage-related installations and general maintenance of the drainage facilities.

The site visit was performed in the presence of representatives from the following entities:

- United States Environmental Protection Agency (Region IX)
- Strong Motions Inc.
- Plains All -American
- Rancho LPG Holding, LLC



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The site reconnaissance was led by personnel of Plains All-American and they permitted access to all locations requested by this firm and Strong Motions, Inc. The site appeared to be generally well maintained and organized. Work was being performed during the site visit to drain one of the large butane tanks for scheduled maintenance of the tank. The following paragraphs summarize the geotechnical-related observations by this firm.

### **Slopes-Containment Basin**

The purpose of the containment basin is to capture butane (as a liquid) should any escape from Butane Tanks T-1 or T-2 resulting from catastrophic failure. The containment basin is labeled on the attached Plot Plan 1 (East). The containment area consists of an enclosed pit measuring 180 feet by 320 feet at its base with slopes that range in height from 15 to 25 feet and are inclined at a 1.5 to 1 gradient (horizontal to vertical). The slopes are covered with an asphalt emulsion. Cracks up to 1½ inches in width in the emulsion appear near the top of the slopes. Holes and soil piles from ground-burrowing rodents were observed on the surface of the asphalt emulsion at several locations of the containment basin. No scarps or deformations in the slopes suggestive of a previous or incipient failure were noted.

The bottom of the containment basin is unlined and vegetated with grasses. In order to permit the drainage of storm runoff water from the basin, an outlet drain is located near the southwest corner. The drain consists of a 16- inch diameter, corrugated, metal pipe. It is the understanding of this firm that the pipe discharges to the storm drain system on North Gaffey Street. No device exists to contain liquid butane (or other released substance) from entering the drain in the event of discharge by the tanks. However, a control valve near Gaffey Street controls the flow of stormwater and, in the event of a liquid release into the storm drain system.



### **Slopes - East Side of Tanks T-1 and T-2**

The slopes rise to the east from 75 to 90 feet above the base of tanks. The slopes were cut during mass grading of the site around 1973 and have concrete lined terrace drains at approximately 25 foot vertical intervals. The terrace drains discharge to concrete-lined downdrains. The slopes expose light brown silty sand that is consistent with the descriptions found on the attached geologic maps. The slopes are vegetated with annual grasses. No indications of instability such as cracked and displaced terrace drains, hummock topography, or surficial scars on the slopes were noted.

### **Area Drains**

It was noted that the surficial drains that collect rainfall runoff from the terraces at Tanks T-1 and T-2 were partially filled with sediment that will impede drainage of the runoff. The sediment needs to be removed as part of regular maintenance of the site.

### **Ring Foundation for Tanks T-1 and T-2**

The foundation appeared to be in good condition with no cracks greater than hairline in width noted.

### **Flare Stack**

A flare stack is located near the southeast corner of the site near the top of the 90 foot high, westerly-descending slope. The foundations for the flare stack have been recently upgraded. The concrete foundation of the flare stack appeared to relatively new and uncracked. The ground surface around the flare stack did not exhibit indications of slope instability such as cracks, ground settlement, or surficial scars. However, evidence of rodent activity was noted nearby. Rodent burrows will directly reduce the stability of a slope and permit pathways for water infiltration that will further destabilize a slope.





## **REVIEW OF EVALUATION BY GMU GEOTECHNICAL**

The purpose of the evaluation by GMU Geotechnical, Inc. (GMU, 2010) was to respond to questions by raised by the EPA following a review of a seismic hazard assessment report completed by ABS Consulting (ABS, 2010). The EPA raised questions about the facility concerning the findings found in the ABS. The facility operator commissioned a follow-up evaluation by GMU to respond to the EPA's questions. Geotechnologies, Inc. has not attached a copy of the email correspondence between the EPA and the facility operator concerning the ABS report. However, the questions are repeated in the report with the consultant responses immediately following. The issues that were addressed in the report include:

- Field exploration
- Laboratory testing
- Site specific seismic parameters
- Stability analysis of on-site slopes
- Liquefaction potential

General commentary of the work by GMU as well as correlation of the work to the CalARP seismic guidance document follows.

### **Field Exploration**

The field exploration by GMU included drilling and sampling two borings to depths of 50 and 100 feet with a hollowstem auger, and three soundings to depths ranging from 37 to 50 feet with a cone penetrometer. Soil samples taken from the borings were tested for various soil properties.

Three of the explorations (DH-1, DH-2, and CPT-1) were performed either at the toe or the top of the west-descending slope near the tanks T-1 and T-2. The remaining two explorations were conducted in the vicinity of the office, located near the northeast corner of the site.



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Comment 1: No borings were drilled between the butane tanks and the containment area slope by GMU. As mentioned in the Local Geology section of this report, groundwater was identified at an elevation of 12.8 feet above msl in Boring DH-2. This elevation corresponds to a depth of 10.2 feet below the ground surface at the bottom of the containment basin. Additional investigation is warranted to characterize the soils comprising the slope between the containment basin and the butane tanks. This information should be used to address comments found later in this review.

One of the CPT soundings (CPT-3) was excavated near the office building to a depth of 50 feet. This sounding was used to obtain the value  $V_{s30}$  that is used in a later calculation for the site specific ground motion hazard analysis. The value obtained for  $V_{s30}$  was 510 ft./second (155 m/s).

Comment 2: The value obtained 155 m/s is considered by this firm to be low for the San Pedro sand. Based on the research by Tinsley and Fumal (1985) a higher velocity value may be appropriate. The value of  $V_{s30}$  should be based on measurements from the upper 100 feet of soils and therefore may yield a higher value. It is recommended that a shear wave velocity measurement to a depth of 100 feet be obtained by either a CPT sounding or a downhole measurement in a boring.

### Laboratory Testing

The selection of tests appears appropriate and the tabulated results appear reasonable. However, the soil samples were not obtained from the location between the butane tanks and containment area.

Comment 3: Additional geotechnical tests of the soils obtained from the recommended boring(s) between the butane tanks and the containment basin are warranted. The results should be used to respond to comments that appear later in this review.

Comment 4: It is not stated in the evaluation if the direct shear tests on the San Pedro Sand were performed at field moisture or saturated conditions. The tests should be run under



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saturated conditions and the results utilized in the slope stability calculations as appropriate. Saturated conditions can occur during extended period of rainfall and represent the most critical soil moisture state from the standpoint of soil strength.

### **Site-Specific Seismic Parameters**

Site-specific seismic parameters were calculated using the US Geological Survey computer program, Ground Motion Parameter Calculator (Version 5.0.09a). The results were used in the calculation of seismic slope stability and for liquefaction analyses.

Comment 5: According to the CalARP guidance manual, the procedure of ASCE 7-05, Chapter 21 should be used for site-specific, ground motion hazard assessments. The more detailed and site specific procedure of ASCE 7-05 Chapter 21 be followed.

Comment 6: The site is located 400 feet from the Palos Verdes Fault which has a recurrence interval of 400 to 900 years (McNeilan, T.W., et. al, 1995). As a result of this proximity and recurrence interval, the near source directivity option should be used when performing the site specific analysis of ASCE 7-05 chapter 21.

Comment 7: The Vs30 value used in the analysis should be derived from a site-specific measurement that extends to a depth of 100 feet as mentioned in Comment 2.

### **Slope Stability - Westerly Descending Slope above Butane Tanks**

GMU Geotechnical performed a slope stability analysis along Cross Section 2-2' that shows the profile of the westerly descending slope through Butane Tank T-1.

Comment 8: A slope stability analysis should also be performed through the westerly-descending slope and Butane Tank T-2. The slope is 15 feet higher and may be more critical. A new cross section perpendicular to the slope face that would be the most critical section should be drawn.

Comment 9: The pseudostatic slope stability analysis should be performed using the results from an updated seismic hazard analysis described in Comment 5.



Comment 10: The summary page of the slope stability analyses (pages C1 and C2) identifies the seismic displacement of the high slope on the east side of the site to be 7 inches and 8 inches. GMU Geotechnical concluded the tanks located at the toe of the slope are not likely to be impacted by the slope displacement. It should be noted that the values yielded by the methodology used (Bray, 2007) are not actual displacement distances but should be used as an index of performance (Blake, Hollingsworth and Stewart, 2002). The calculated index value (7 and 8 inches for a slope 75 to 90 feet high) is significant, and should be addressed.

### **Slope Stability-Westerly Descending Slope of Containment Area, Below Butane Tanks**

GMU Geotechnical performed a slope stability analysis along Cross Section 2-2' that shows the profile of the westerly-descending slope through Butane Tank T-1. The analyzed cross section includes a portion of the Butane Tank.

Comment 11: The cross section used in the analysis is not oriented perpendicular to the slope to yield the most conservative value for Factor of Safety. The cross section should be redrawn and to include the steepest slope orientation.

Comment 12: Based on the information provided in the report, it does not appear stability analysis was performed that considers the surcharge caused by the butane tank with contents. A new analyses should consider the surcharge on the slope caused by a tank at operational capacity.

Comment 13: As mentioned in Comment 4, it is unknown if the soil strength obtained from the direct shear testing was performed under saturated conditions. A saturated shear strength should be used in light of the shallow depth to groundwater table beneath the containment basin.

Comment 14 A large fill wedge is shown on the cross sections used for the stability analysis on the east face of containment basin. The geometry of the fill wedge is likely based on review of a Grading Plan cited in the references. Subsurface explorations should be performed to identify the properties of the fill soil comprising this slope as addressed in Comment 1.



Comment 15: The groundwater elevation shown on the slope stability analysis Cross Sections (Figure C-8.1) is approximately coincident with the groundwater depth identified in the borings by GMU Geotechnical. Review of the Seismic Hazard Report for the Torrance 7.5-Minute Quadrangle (CDMG, 2006) suggest that groundwater may reach an elevation of 20 feet. The stability analysis (and lateral spreading) analysis should consider the groundwater at this higher elevation.

Comment 16: The data input file from the computer program should be included for all analyses results.

### **Liquefaction**

The potential for liquefaction was addressed at the locations near the base of the westerly descending hill (CPT-1) and near the office building (CPT-2 and CPT-3). The values in the analysis using a peak ground acceleration of 0.5g which appears adequate.

Comment 17: The potential for liquefaction in the containment basin should be addressed since the basin is downslope of Butane Tanks T-1 and T-2 and the historically highest groundwater level is shallow in this area (less than 5 feet below the ground surface). Additional boring(s) and laboratory analyses in the containment area and adjacent berm will be necessary.

### **Lateral Spreading**

Lateral spreading is a seismic related phenomenon that occurs to gently sloping ground with a free face when layers of geologic materials are liquefied and move in a downslope direction. This hazard was not addressed in the evaluation.

Comment 18: This hazard should be addressed according to the CalARP guidance document. The analysis should also be performed in the containment area, below the Butane Tanks T-1 and T-2. The borings and analyses identified in Comment 18 may be used for this purpose.



### **Seismic Settlement**

Seismic settlement occurs when loose dry, cohesionless soils settle as a result of seismic shaking. This hazard is listed in the CalARP guidance document, but was not addressed in the referenced evaluation.

Comment 19: Analysis for these phenomena should be performed for the soil column in the vicinity of the butane tanks, to the depth of the current ground water surface.

### **RECOMMENDATIONS BASED ON THE SITE VISIT**

Based on the observations made by this firm during the site visit, the following geotechnical-related maintenance recommendations are provided but are unrelated to the review by GMU. The items listed are not listed in the Cal-ARP document but are prudent maintenance practices, and should be addressed by the site owner.

- Item 1: Several slope areas were noted to have evidence of burrowing rodents. The burrows will degrade the strength of the materials comprising the slope as well as provide avenues for water infiltration. An eradication program for the rodents should be implemented.
- Item 2: The asphalt emulsion that lines the containment area was observed to have cracks up to 1½ inches wide. The cracks should be filled with new emulsion to prevent rainfall runoff from entering the cracks.
- Item 3: Two area drain inlets that collect water from butane Tank T-1 and T-2 terraces were partially filled with sediment. These storm drains should be cleaned of the debris to restore full capacity.
- Item 4: The site maintenance program should include regular observations and cleaning or repair, as needed, of all area drains, terrace drains and asphalt emulsion surfaces.



- Item 5: The design of the storm water outlet at the southwest corner of the containment basin should be checked. Also, the valve near Gaffey Street should be included on a maintenance program.

### **CONCLUSION**

Although the GME report addressed some the data collection and analysis requirements for a seismic hazard analysis found in the Guidance for CalARP Program Seismic Assessments document, some analysis critical for the evaluation of the seismic hazards at the site were not addressed as described in this review.

### **CLOSURE AND LIMITATIONS**

The purpose of this review is to aid in the analysis of the described facility. Implementation of the advice presented in this report is intended to reduce certain risks. The professional opinions and geotechnical advice contained in this report are sought because of special skill in engineering and geology and were prepared in accordance with generally accepted geotechnical engineering practice. Geotechnologies, Inc. has a duty to exercise the ordinary skill and competence of members of the engineering profession. Those who hire Geotechnologies, Inc. are not justified in expecting infallibility, but can expect reasonable professional care and competence.



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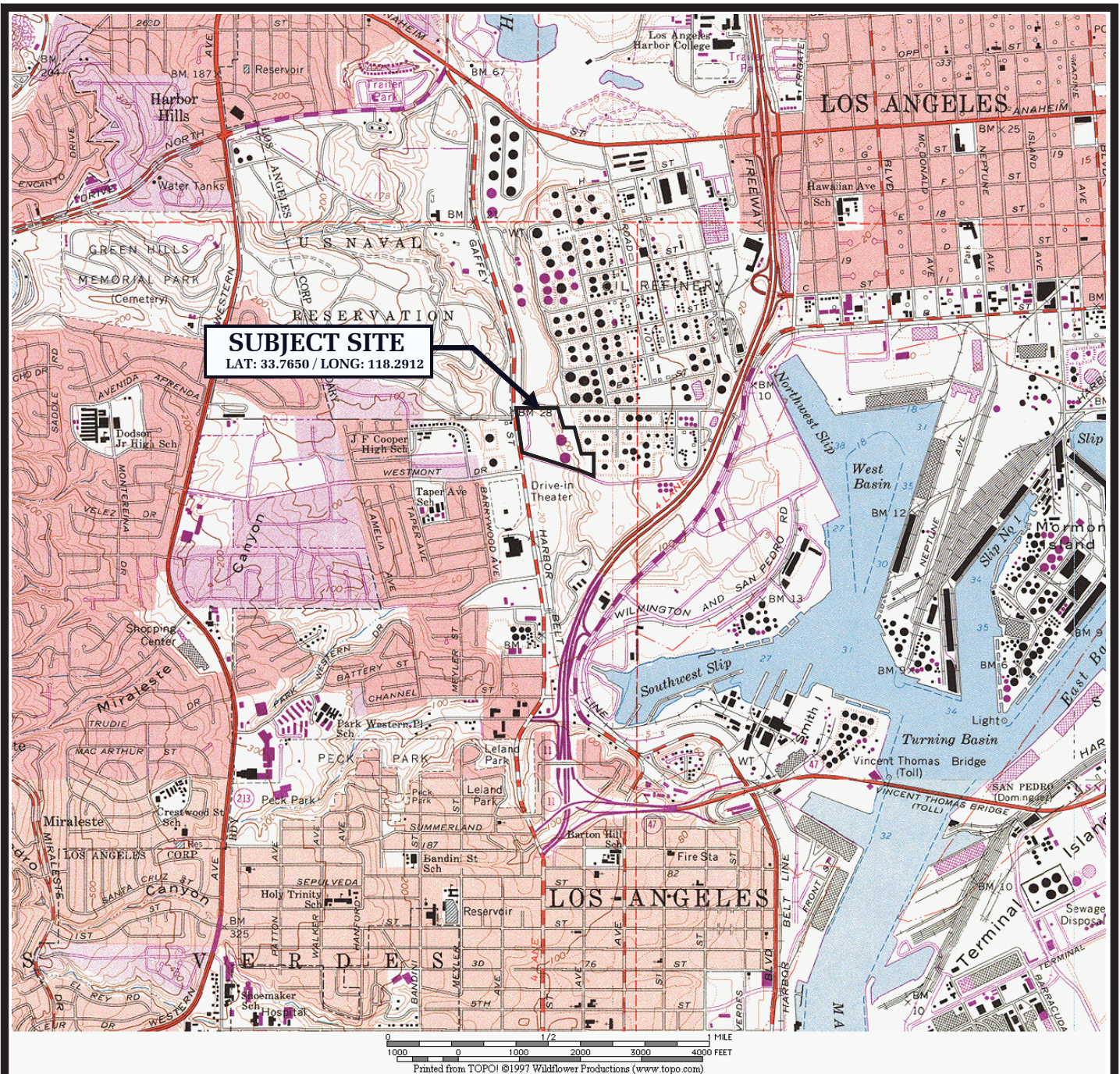
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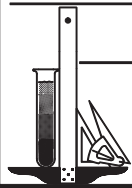
439 Western Avenue, Glendale, California 91201-2837 • Tel: 818.240.9600 • Fax: 818.240.9675  
[www.geoteq.com](http://www.geoteq.com)



REFERENCE: U.S.G.S. TOPOGRAPHIC MAPS, 7.5 MINUTE SERIES,  
TORRANCE, CA QUADRANGLE



## VICINITY MAP

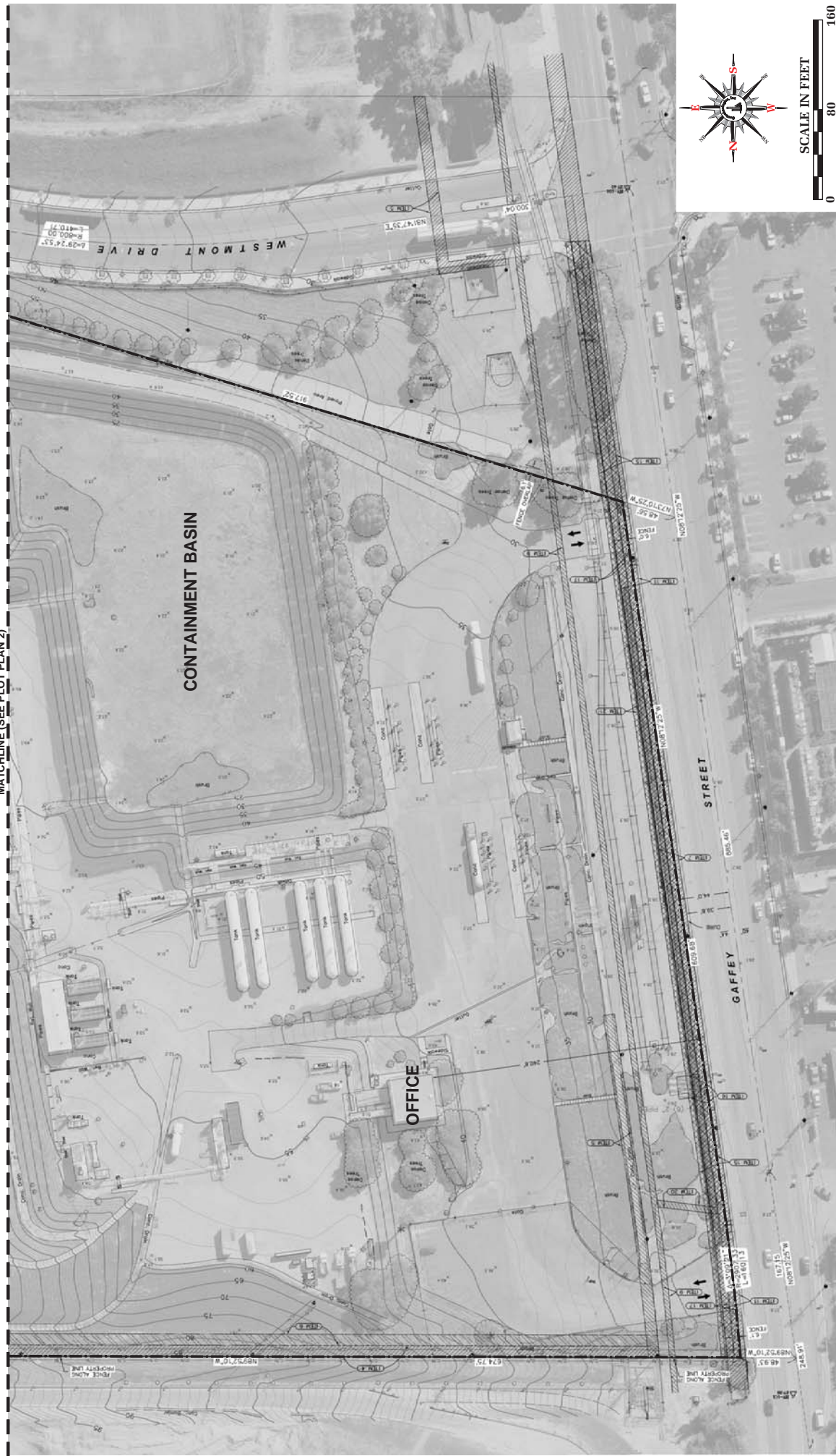


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MATCHLINE (SEE PLOT PLAN 2)



CONTAINMENT BASIN

OFFICE

WESTMONT DRIVE

STREET

GAFFEY

PLOT PLAN 1 - (WEST)

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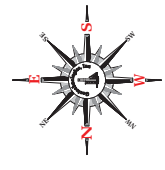
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Date: May '12

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REFERENCE: ALTA/ACSM LAND TITLE SURVEY BY DULIN AND ROYNTON  
DATED 11/12/08



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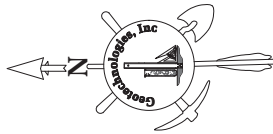
**PLOT PLAN 2 - (EAST)**

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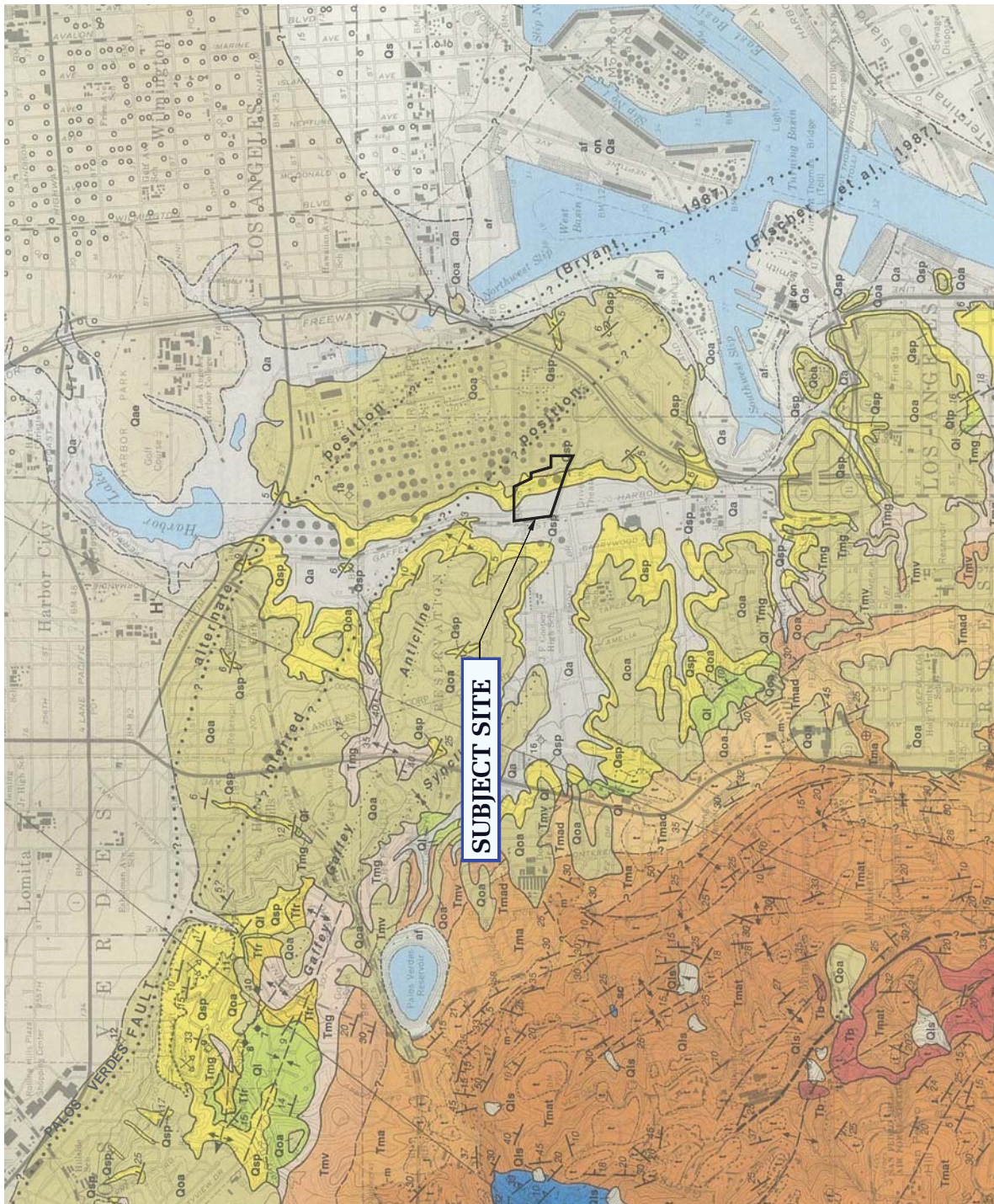
Date: May '12

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 DATED 11/12/08

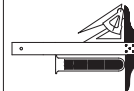


### LEGEND

- af: Artificial fill or cut and fill
- Qs: Beach Sediments - Sand to cobble-boulder gravel
- Qa: Alluvium - Mostly loamy clay
- Qae: Alluvium - Similar to Qa, but slightly elevated and locally dissected
- Qls: Landslide debris - Mostly of Monterey shale
- Qoa: Older Alluvium - Non-Marine terrace cover, sandy loam, and loamy clay
- Qsp: San Pedro Sand - Sand and pebble gravel
- Tng: Malaga Mudstone - Mudstone with diatomaceous strata and limestone concretions
- Tmv: Monterey Formation: Valmonte Diatomite - Siltite and mudstone
- Tma: Monterey Formation: Altamira Shale - Upper part
- Tmat: Monterey Formation: Altamira Shale - Lower part
- : Fault - dashed where indefinite or inferred, dotted where concealed, queried where existence is doubtful



## LOCAL GEOLOGIC MAP (DIBBLEE, T.W.)

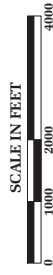
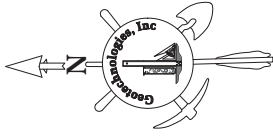


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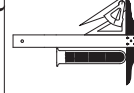
DATE: May '12



**LEGEND**

- Qal: Alluvium and artificial fill
- Qgr: Stream terrace gravel
- Qtc: Nonmarine terrace cover
- Qpv: Palos Verdes sand
- Qsp: San Pedro sand
- Ql: Lomita marl
- Tm: Malaga mudstone member
- Tv: Valmonte diatomite member
- Ta: Altamira shale member

**LOCAL GEOLOGIC MAP  
(WOODRING, W.P., ET AL)**

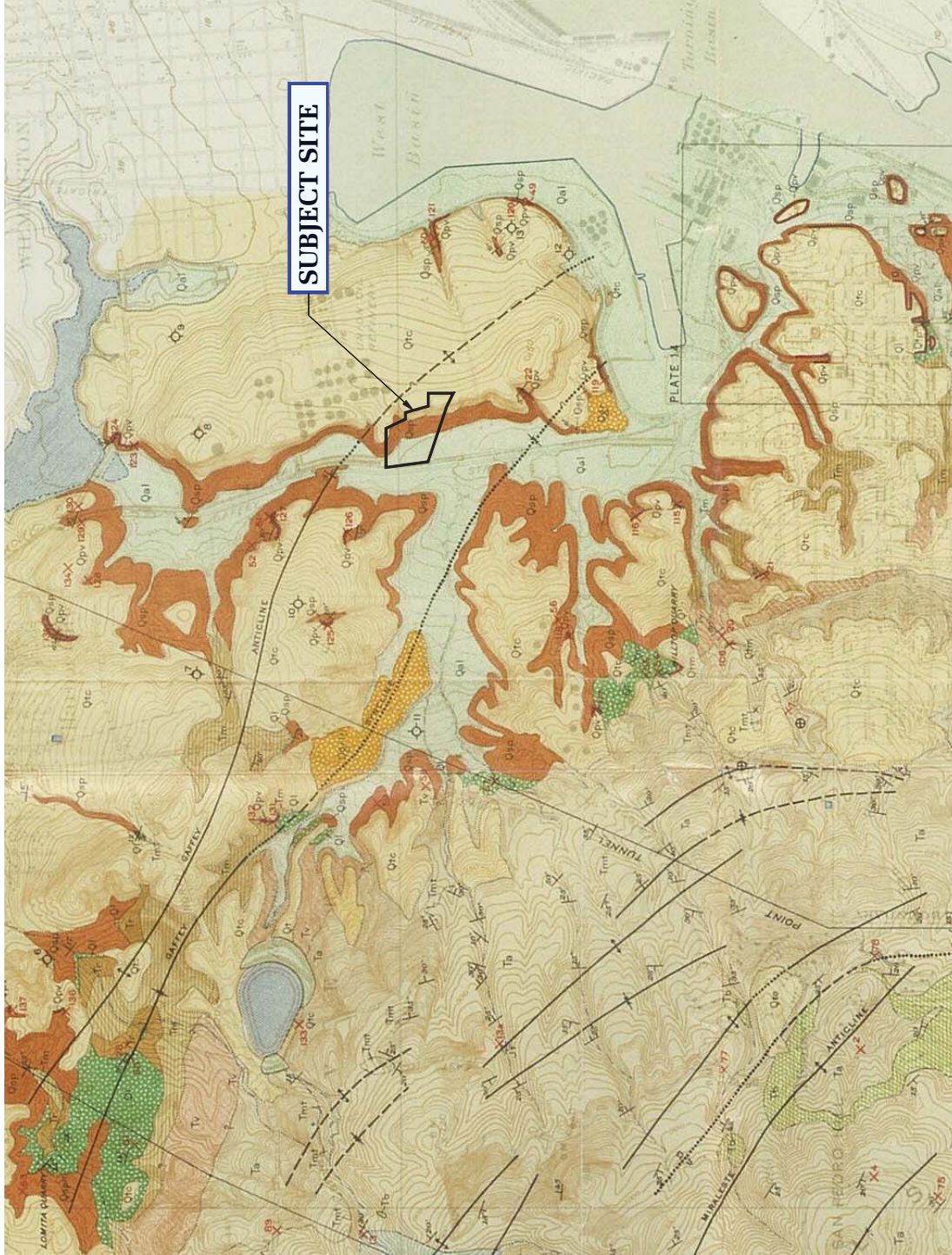


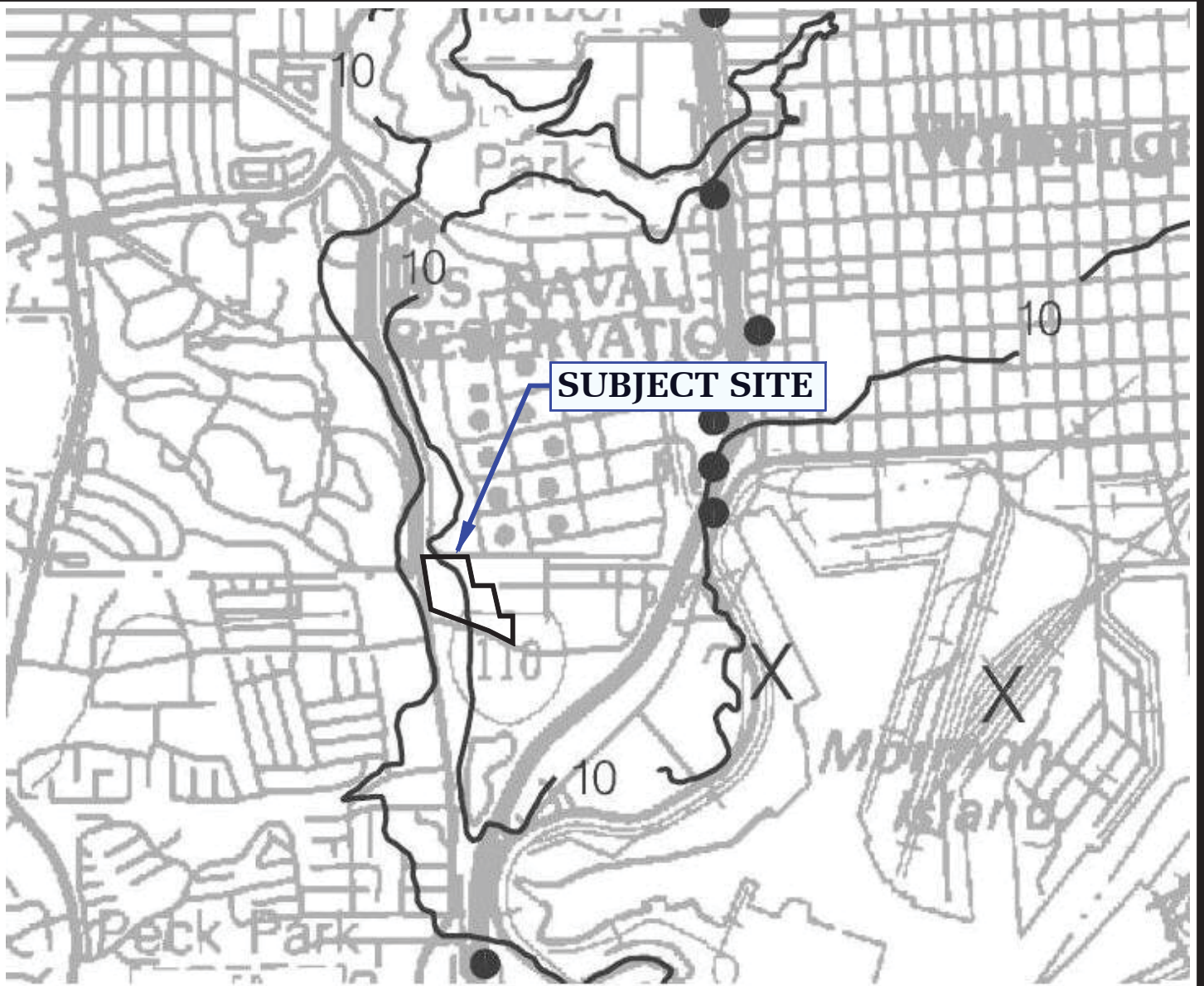
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**DATE: May '12**





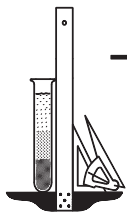
ONE MILE  
SCALE

10 Depth to groundwater in feet



REFERENCE: CDMG, SEISMIC HAZARD ZONE REPORT, 035  
TORRANCE 7.5 - MINUTE QUADRANGLE, LOS ANGELES COUNTY, CALIFORNIA (1998, REVISED 2006)

**HISTORICALLY HIGHEST GROUNDWATER LEVELS**

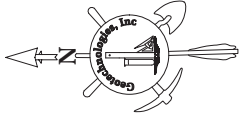


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- Earthquake Fault Zones
- Alquist-Priolo Earthquake Fault Zone

## EARTHQUAKE FAULT ZONE MAP

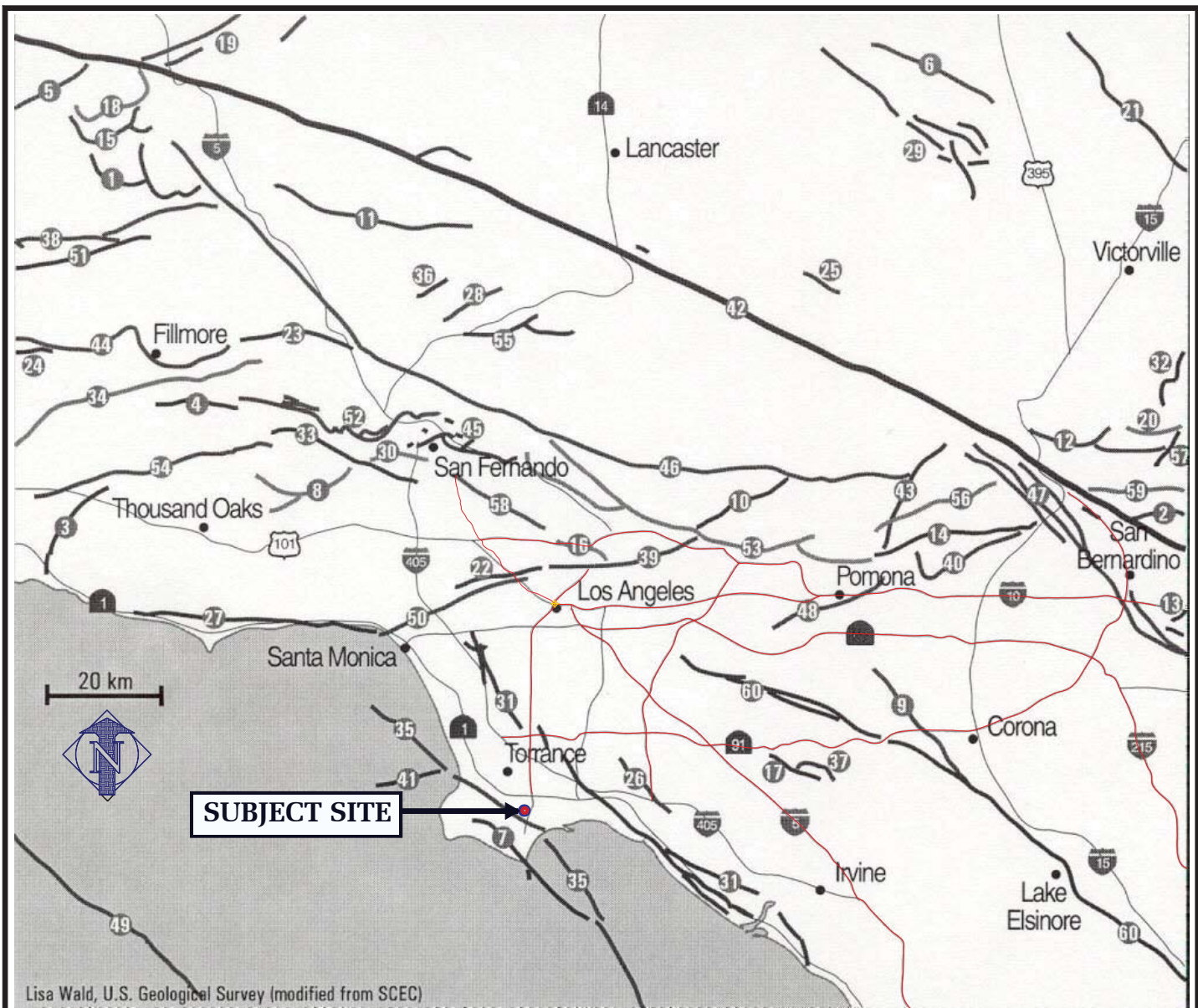
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REFERENCES: SPECIAL STUDIES ZONES, LONG BEACH QUADRANGLE, CDMG, 1986  
SPECIAL STUDIES ZONES, TORRANCE QUADRANGLE, CDMG, 1986

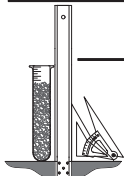


Lisa Wald, U.S. Geological Survey (modified from SCEC)

- |                             |                                  |                                         |
|-----------------------------|----------------------------------|-----------------------------------------|
| 1 Alamo thrust              | 21 Helendale fault               | 41 Redondo Canyon fault                 |
| 2 Arrowhead fault           | 22 Hollywood fault               | 42 San Andreas Fault                    |
| 3 Bailey fault              | 23 Holser fault                  | 43 San Antonio fault                    |
| 4 Big Mountain fault        | 24 Lion Canyon fault             | 44 San Cayetano fault                   |
| 5 Big Pine fault            | 25 Llano fault                   | 45 San Fernando fault zone              |
| 6 Blake Ranch fault         | 26 Los Alamitos fault            | 46 San Gabriel fault zone               |
| 7 Cabrillo fault            | 27 Malibu Coast fault            | 47 San Jacinto fault                    |
| 8 Chatsworth fault          | 28 Mint Canyon fault             | 48 San Jose fault                       |
| 9 Chino fault               | 29 Mirage Valley fault zone      | 49 Santa Cruz-Santa Catalina Ridge f.z. |
| 10 Clamshell-Sawpit fault   | 30 Mission Hills fault           | 50 Santa Monica fault                   |
| 11 Clearwater fault         | 31 Newport Inglewood fault zone  | 51 Santa Ynez fault                     |
| 12 Cleghorn fault           | 32 North Frontal fault zone      | 52 Santa Susana fault zone              |
| 13 Crafton Hills fault zone | 33 Northridge Hills fault        | 53 Sierra Madre fault zone              |
| 14 Cucamonga fault zone     | 34 Oak Ridge fault               | 54 Simi fault                           |
| 15 Dry Creek fault          | 35 Palos Verdes fault zone       | 55 Soledad Canyon fault                 |
| 16 Eagle Rock fault         | 36 Pelona fault                  | 56 Stoddard Canyon fault                |
| 17 El Modeno fault          | 37 Peralta Hills fault           | 57 Tunnel Ridge fault                   |
| 18 Frazier Mountain thrust  | 38 Pine Mountain fault           | 58 Verdugo fault                        |
| 19 Garlock fault zone       | 39 Raymond fault                 | 59 Waterman Canyon fault                |
| 20 Grass Valley fault       | 40 Red Hill (Etiwanda Ave) fault | 60 Whittier fault                       |

REFERENCE: <http://pasadena.wr.usgs.gov/info/images/LA%20Faults.pdf>

## SOUTHERN CALIFORNIA FAULT MAP

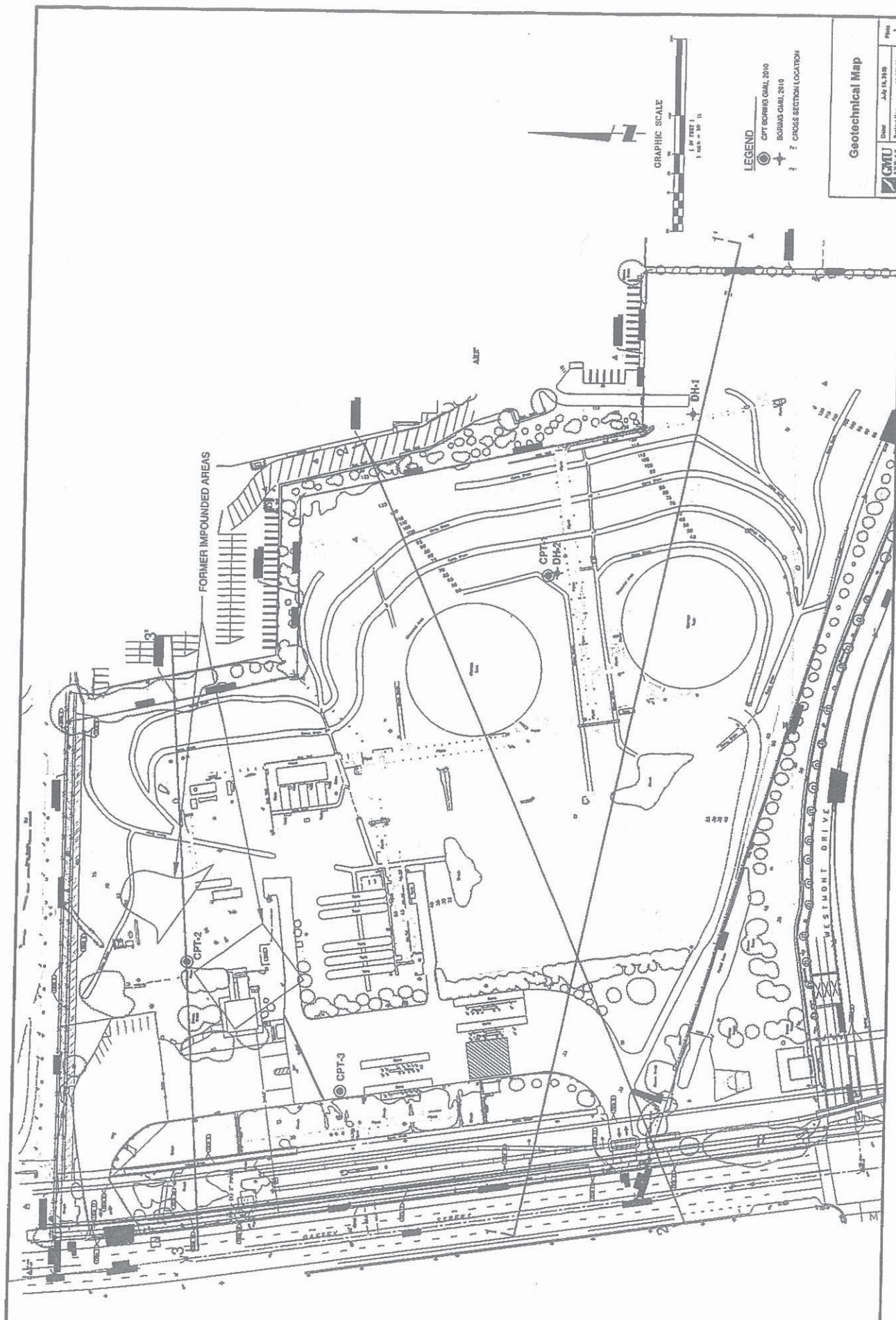


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FILE No. 20278

FIGURE I



**Geotechnical Map**

Client	July 14, 2010	Sheet	1
Project No.	10-000-00		

**LEGEND**

- CPT BORING LOCATION
- ⊕ DH BORING LOCATION
- ⊥ CROSS SECTION LOCATION

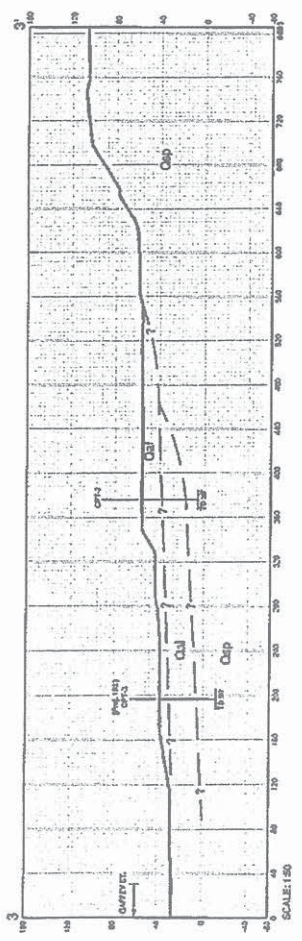
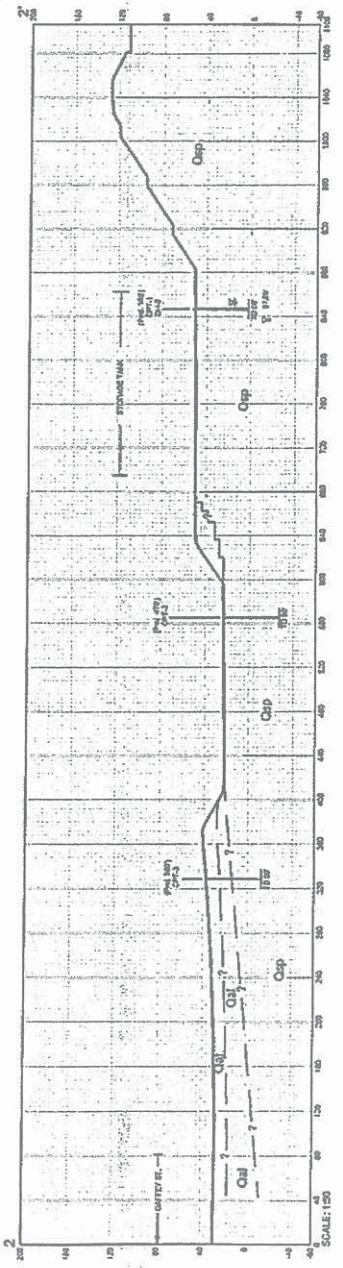
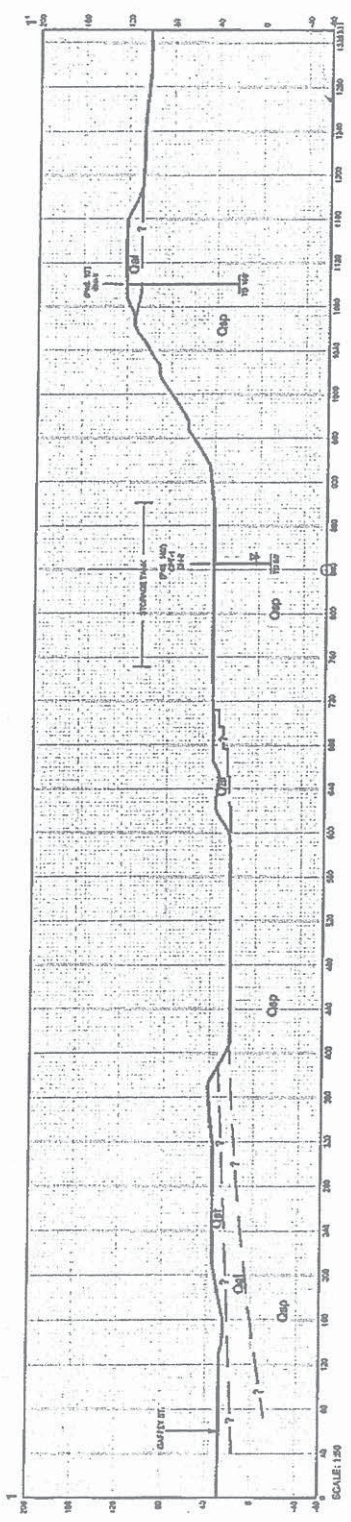
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1" = 20' (SEE PAGE 1)



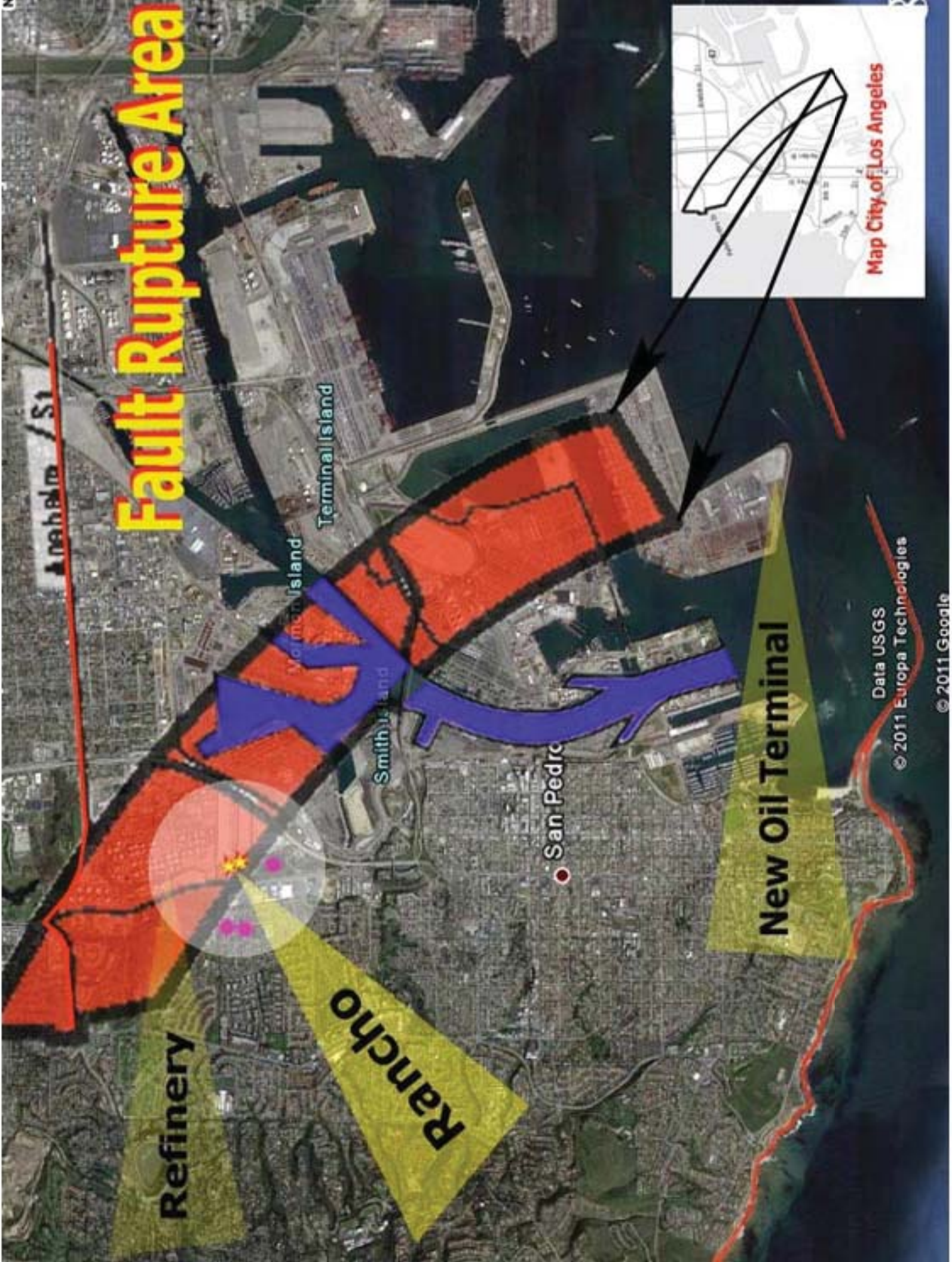
# Geotechnical Sections

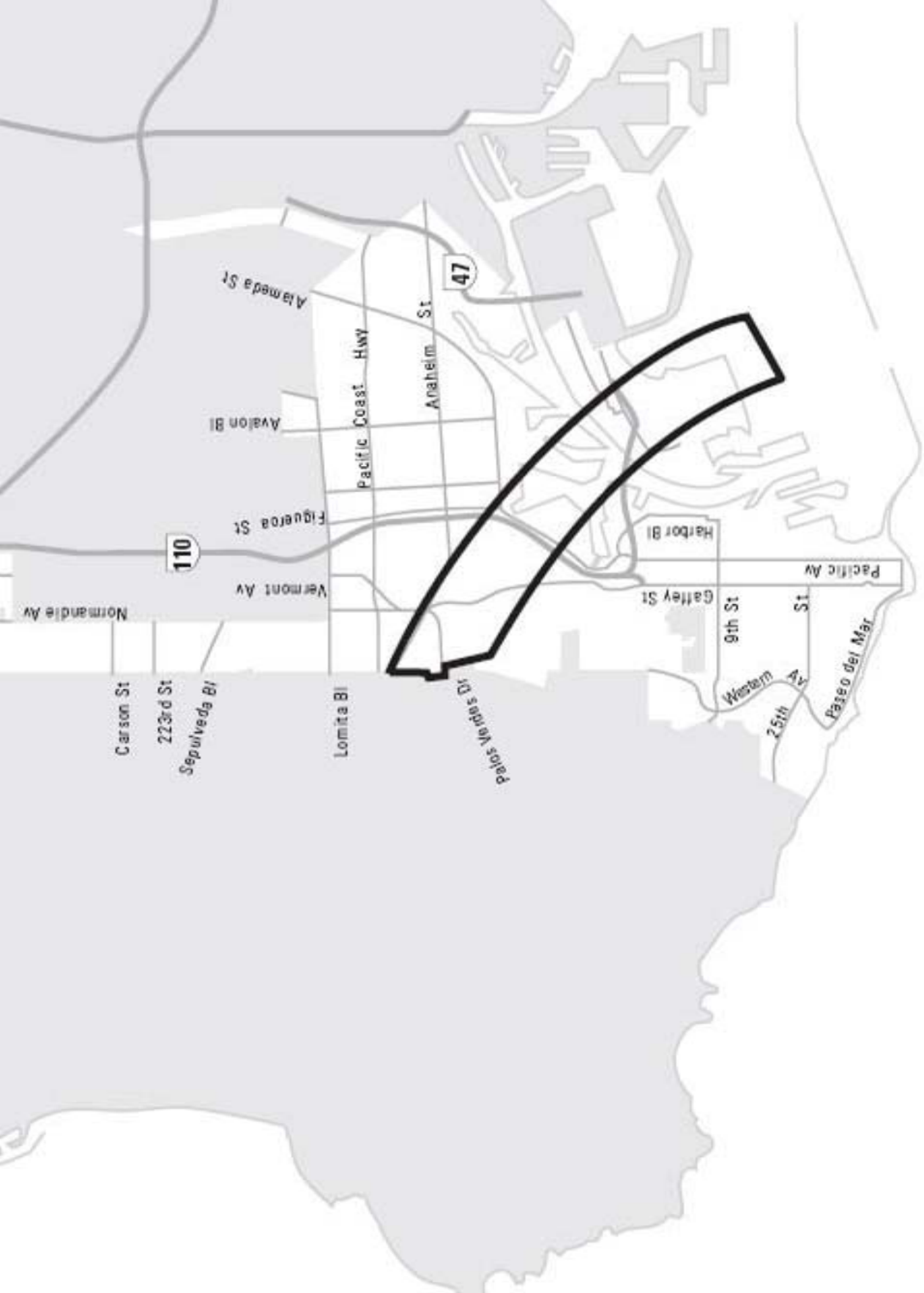
Date: July 15, 2010  
 Project No.: 10-400-00  
 Page: 3



**LEGEND**  
 Artificial Fill  
 Alluvium  
 San Pedro Formation

# Fault Rupture Area







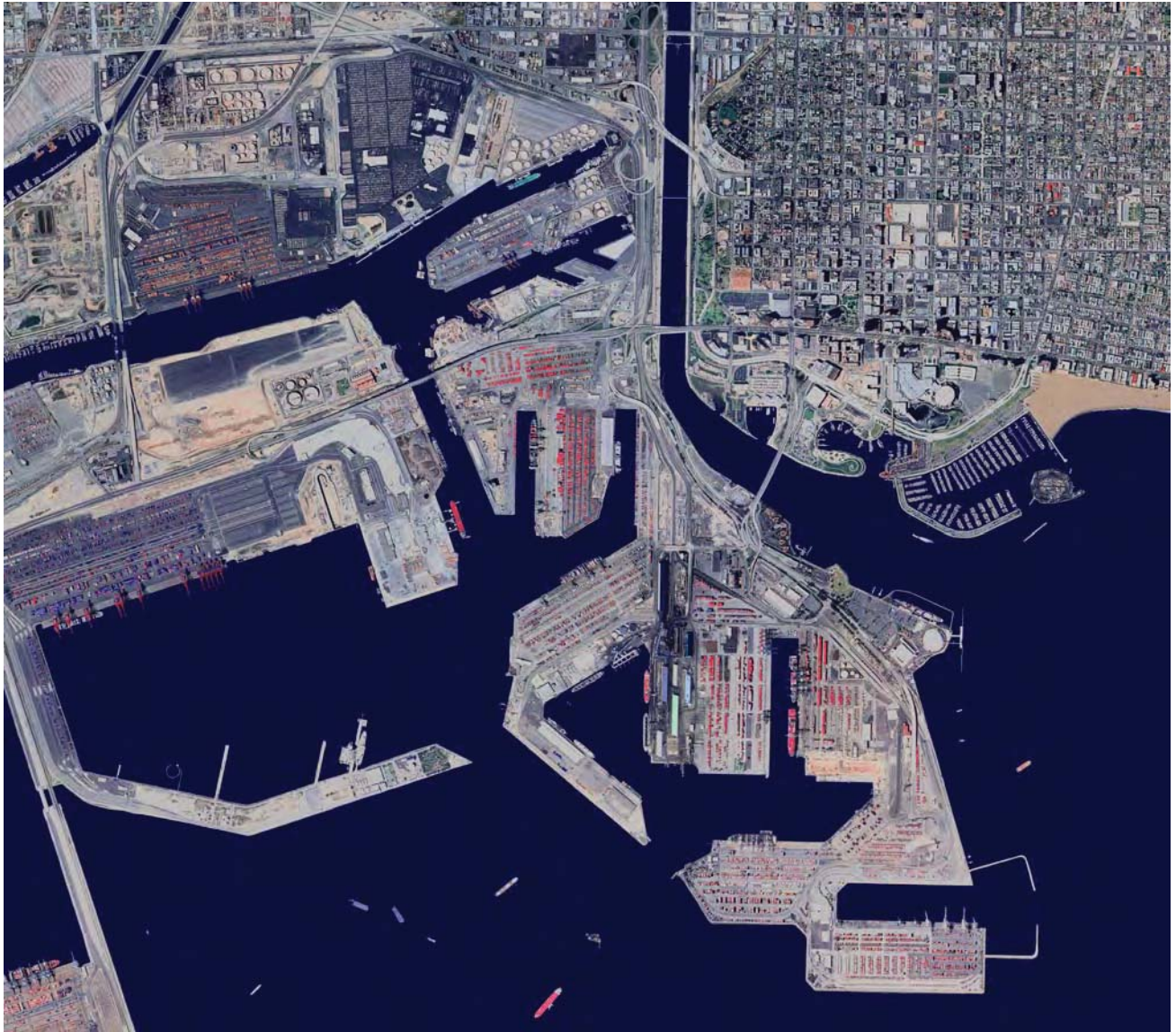
CAPITAL

LEAVING  
HAZARD ZONE

NO STOPPING  
ANY TIME

NO STANDING

# PORT-WIDE GROUND MOTION STUDY PORT OF LONG BEACH, CALIFORNIA *FINAL REPORT*



Prepared For:



The Port of Long Beach  
925 Harbor Plaza  
Long Beach, CA 90801

Prepared By:



Earth Mechanics, Inc.  
17660 Newhope Street, Suite E  
Fountain Valley, CA 92708

EMI Project No. 01-143

August 7, 2006





# Earth Mechanics, Inc.

Geotechnical & Earthquake Engineering

August 7, 2006  
EMI Project No. 01-143

Mr. Doug Thiessen, P.E.  
Chief Harbor Engineer  
Port of Long Beach  
925 Harbor Plaza  
Long Beach, CA 90801

Attention: Mr. Cheng Lai, P.E., S.E.  
Senior Structural Engineer

Subject: *Final Report on Port-Wide Ground Motion Study, Port of Long Beach, California*

Dear Mr. Lai:

Attached please find the Final Report of our port-wide ground motion study. This report contains the methodology and findings of our study and the resulting recommendations for design of port structures. The review comments received from the Port of Long Beach to date have been addressed into this report.

On behalf of the entire project team, we appreciate the opportunity to work with you on this project. If you have any questions or comments on this report, please do not hesitate to call us.

Sincerely,  
EARTH MECHANICS, INC.

Bruce A. Schell, CEG 1434  
Senior Engineering Geologist



(Arul) K. Arulmoli, GE 2090  
Project Manager



Norman A. Abrahamson, Ph.D.  
Consultant

Ignatius Po Lam, GE 2107  
Principal



Copies:

- (6) Port of Long Beach
- (1) Dr. Tom Henyey, Technical Advisory Panel
- (1) Dr. Geoffrey Martin, Technical Advisory Panel
- (1) Dr. Nigel Priestley, Technical Advisory Panel



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## EXECUTIVE SUMMARY

This report presents a port-wide ground motion study for the Port of Long Beach (POLB) performed by Earth Mechanics, Inc. (EMI) with an expert team review. The probabilistic seismic hazard analysis efforts were led by Dr. Norm Abrahamson, as a consultant to EMI, with EMI providing an independent check. The expert review team included Dr. Tom Henyey, Professor of Geological Sciences and Geophysics, University of Southern California (USC) and Director Emeritus of the Southern California Earthquake Center (SCEC); Dr. Geoffrey Martin, Professor, Department of Civil Engineering, USC; Dr. Nigel Priestley, Emeritus Professor of Structural Engineering, University of California, San Diego. The primary aim of the study was to develop consistent seismic ground motion recommendations for structures within the POLB area for operating-level earthquake (OLE) and contingency-level earthquake (CLE) design events.

Regional and site geology and seismicity were reviewed and summarized to establish the latest understanding on geological features and faults contributing to the seismic hazard at the POLB. Geotechnical ground conditions affecting site response were interpreted from review of available geotechnical data reports for numerous project sites located throughout the port area (no field investigations were undertaken for the purpose of the study). Four generalized site soil profiles representative of the POLB area were developed for site response assessment.

Probabilistic seismic hazard analysis was performed using the latest revisions of ground attenuation models commonly used in California, including the latest version of an attenuation model that is currently under development as part of the Pacific Earthquake Engineering Research (PEER)/ Lifelines Next Generation Attenuation (NGA) Project. Uncertainties in earthquake source and attenuation model parameters were addressed through the use of logic trees. Local site conditions were incorporated based on quantitative and qualitative assessment and supported by empirical strong motion data. The newly calculated Uniform Hazard Spectra (UHS) were compared to the history of prior spectra. A discussion is provided identifying the sensitivity of key parameters affecting ground motion criteria.

This report provides horizontal and vertical-component UHS for firm-ground conditions and design response spectra for OLE and CLE events that can be used by structural designers utilizing modal response spectrum analysis techniques. Damping values ranging from 1 to 25% were considered in the study. A total of 7 sets of horizontal and vertical spectrum-compatible acceleration-time histories are provided for firm-ground conditions and design ground conditions for each earthquake event. Simplified Newmark Sliding Block analyses were performed to develop the corresponding Newmark charts, providing estimates of ground displacement as a function of yield acceleration.

The report concludes with suggested guidelines for future design practice in site response analysis, including adjustments for deep-soil sites and near-fault rupturing effects. The report will require an update of the ground motion design criteria presented when changes in the state of practice in the seismological, geological, and geotechnical framework (such as the findings from the PEER NGA study) occur.

# SECTION 1 INTRODUCTION

## 1.1 OUTLINE OF REPORT

Presented herein is a port-wide ground motion study for the Port of Long Beach (POLB) undertaken by Earth Mechanics, Inc. (EMI) with expert review. The site location is shown in Figure 1-1. The study was undertaken to address seismic recommendations corresponding to operating level earthquake (OLE) and contingency level earthquake (CLE) design events at the POLB. The primary aim of the study was to develop consistent seismic ground motion recommendations for design of POLB structures.

The report targets those parties involved with the seismic design of pile-supported container wharves and other structures within the POLB area. Key design inputs provided are uniform hazard spectra for OLE and CLE excitation levels. These are intended for direct use by structural designers utilizing modal response spectrum analysis techniques. Also provided are spectrum-compatible OLE and CLE acceleration-time histories for both design and firm-ground conditions.

## 1.2 BASIS OF STUDY

The ground motion study was performed by EMI under Contract No. HD-HD-6939 with the POLB. The study was performed using available data and office-based procedures. Geologic and seismicity information was reviewed on a regional and site-specific basis to establish the latest understanding on geological features contributing to the seismic hazard at the POLB. Ground conditions affecting site response within the POLB area were assessed from review of available geotechnical reports for project sites located throughout the POLB area. No field investigations were undertaken for the purpose of the study.

A probabilistic framework was adopted to account for seismic hazard, incorporating the latest revisions of four ground attenuation models commonly used in California. The probabilistic seismic hazard analysis efforts were led by Dr. Norm Abrahamson, as a consultant to EMI, with EMI providing an independent check. Treatment of the uncertainty in earthquake source and attenuation model parameters was provided through use of logic trees. Local site conditions were incorporated based on quantitative and qualitative assessment using proven methods and supported by empirical strong motion data.

In undertaking the ground motion study, a process of expert review was followed to promote consensus of opinion. The services of the following recognized experts were employed to solicit comments on seismic, geotechnical and structural matters: Dr. Tom Henyey, Professor of Geological Sciences and Geophysics, University of Southern California (USC) and Director Emeritus of the Southern California Earthquake Center (SCEC); Dr. Geoffrey Martin, Professor, Department of Civil Engineering, USC; Dr. Nigel Priestley, Emeritus Professor of Structural

Engineering, University of California, San Diego. Coordination with this group was maintained on a regular basis and their review comments incorporated into the study.

The following EMI and former EMI personnel are acknowledged for their efforts during coordination, analysis and preparation of this report: Andy Dodds, Ranjan Gunaranjan, Mike Kapuskar, Hubert Law, Raj Varatharaj, Chien-Tai Yang, and Amir Zand.

### **1.3 SCOPE**

Tasks undertaken in accordance with the scope of work were as follows:

- Review past ground motion studies,
- Review and interpret pertinent geologic and fault information,
- Review and interpret available information on POLB ground conditions,
- Develop generalized site soil profiles representative of the POLB area for site response assessment,
- Perform probabilistic seismic hazard analysis addressing OLE and CLE performance levels,
- Perform sensitivity studies to identify key parameters affecting ground motion criteria,
- Perform Newmark displacement analyses, and
- Comment on needed update of the ground motion design criteria presented.

Deliverable items produced in accordance with the scope of work were as follows:

- Uniform hazard spectra (UHS) for design and firm-ground conditions for OLE and CLE events (horizontal and vertical spectra),
- Seven (7) sets of OLE and CLE spectrum-compatible acceleration-time histories (horizontal and vertical motions),
- Newmark displacement versus yield acceleration plots corresponding to the OLE and CLE acceleration-time histories, and
- Six (6) hard copies and one (1) electronic copy of this report (“pdf” format) presenting the study findings and design recommendations, and electronic ground motion files.

### **1.4 REPORT STATUS**

Characterization of ground motion behavior is subject to periodic refinement and change given the uncertainty associated with earthquakes and the continued strong reliance on empirical observations to improve the understanding of their effects. Future earthquakes are expected to provide additional empirical data that will decrease the knowledge gap, but at the same time may require ongoing adjustment or changes to model parameterization and attenuation relations. A case in point is the major review of ground attenuation models being undertaken as part of a Pacific Earthquake Engineering Research (PEER) initiative, made possible due to empirical data that has increased significantly in size since 1997. This initiative will result in changes to current attenuation models, and are expected to be disseminated into practice within the next two years.

Given the ongoing activities involved with ground motion characterization, this report should be considered a “living” document that may require periodic revision. Elements of the report that may require particular attention in this respect include:

- Earthquake sources,
- Fault characterization (including developments of the Southern California Earthquake Community Fault Model), and
- Ground motion attenuation models.

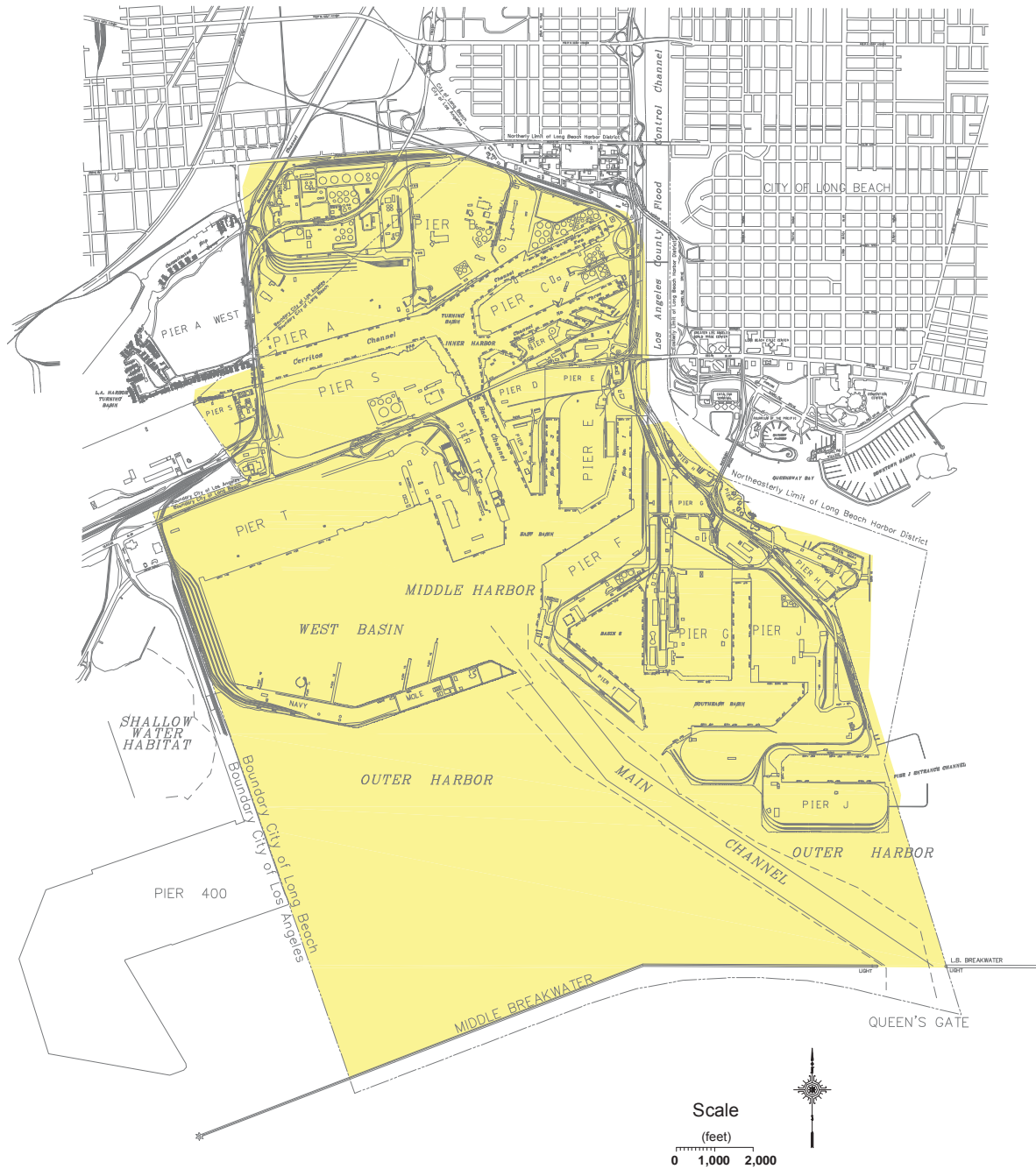


Figure 1-1. Site Location Map

## SECTION 2

# GEOLOGICAL AND GEOTECHNICAL OVERVIEW

### 2.1 REGIONAL GEOLOGY AND SEISMICITY

A detailed description of the physiography, stratigraphy, geologic structure and seismicity for the region is provided in Appendix A. In summary, the POLB complex is located in the coastal area of the Los Angeles Basin, a low-lying plain that rises gently inland to the surrounding mountains including the Santa Monica Mountains to the north, the Repetto and Puente Hills to the northeast, the Santa Ana Mountains to the east, and the San Joaquin Hills to the southeast (see Figure 2-1).

The Los Angeles basin floor is characterized by unconsolidated Holocene-age sediments except for local exposures of the underlying Pleistocene-age formations in the small hills and mesas throughout the basin (for example, Signal Hill). Similar materials occur at the surface and subsurface within the POLB and the immediate offshore area. The Pleistocene materials consist of both non-marine and marine deposits referred to as the Lakewood and San Pedro formations. Both the Lakewood and San Pedro formations provide firm-ground conditions at the POLB.

The region is seismically active. Figure 2-2 shows the spatial distribution of earthquakes with larger, more notable events identified by name. On average, the greater Los Angeles area (i.e. the Los Angeles basin and the adjoining basins such as the San Fernando and San Gabriel valleys) is experiencing compression at rates of between 5 and 9 mm/yr as a result of north-northeasterly tectonic shortening. This compressional tectonic behavior results in a complex mixture of strike-slip and reverse (thrust) faulting and folding. Some of the reverse and thrust faults are poorly located and poorly understood, but earthquakes such as the 1987 Whittier Narrows and 1994 Northridge earthquakes are testimony to the existence of the subsurface reverse faults and for their importance to seismic design. Nevertheless, the bulk of tectonic activity in the Long Beach region during Quaternary time appears to have occurred along the nearby Palos Verdes fault and Newport-Inglewood Structural Zone (NISZ) (see Figure 2-1), both of which are primarily strike-slip faults and represent the most significant seismic potential for the POLB.

### 2.2 SITE GEOLOGY

#### 2.2.1 Stratigraphy

A geologic structure map is shown in Figure 2-3 and characteristic geological cross sections in Figure 2-4 and Figure 2-5 that typify site stratigraphy and geologic structure in the POLB area. Surficial geology is characterized by Holocene-age, near-shore, marine and non-marine strata, including beach, estuary, tidal flat, lagoon, shallow-water bay sediments, and shoreline terrace deposits. Deposited as sea level rose during the Pleistocene age, these deposits have been significantly modified by dredging and filling operations for the numerous harbor facilities. The approximate location of the natural shoreline before harbor and urban development is partially

shown on Figure 2-3, indicating that most of the harbor facilities south of the coastal bluffs have been constructed on fill.

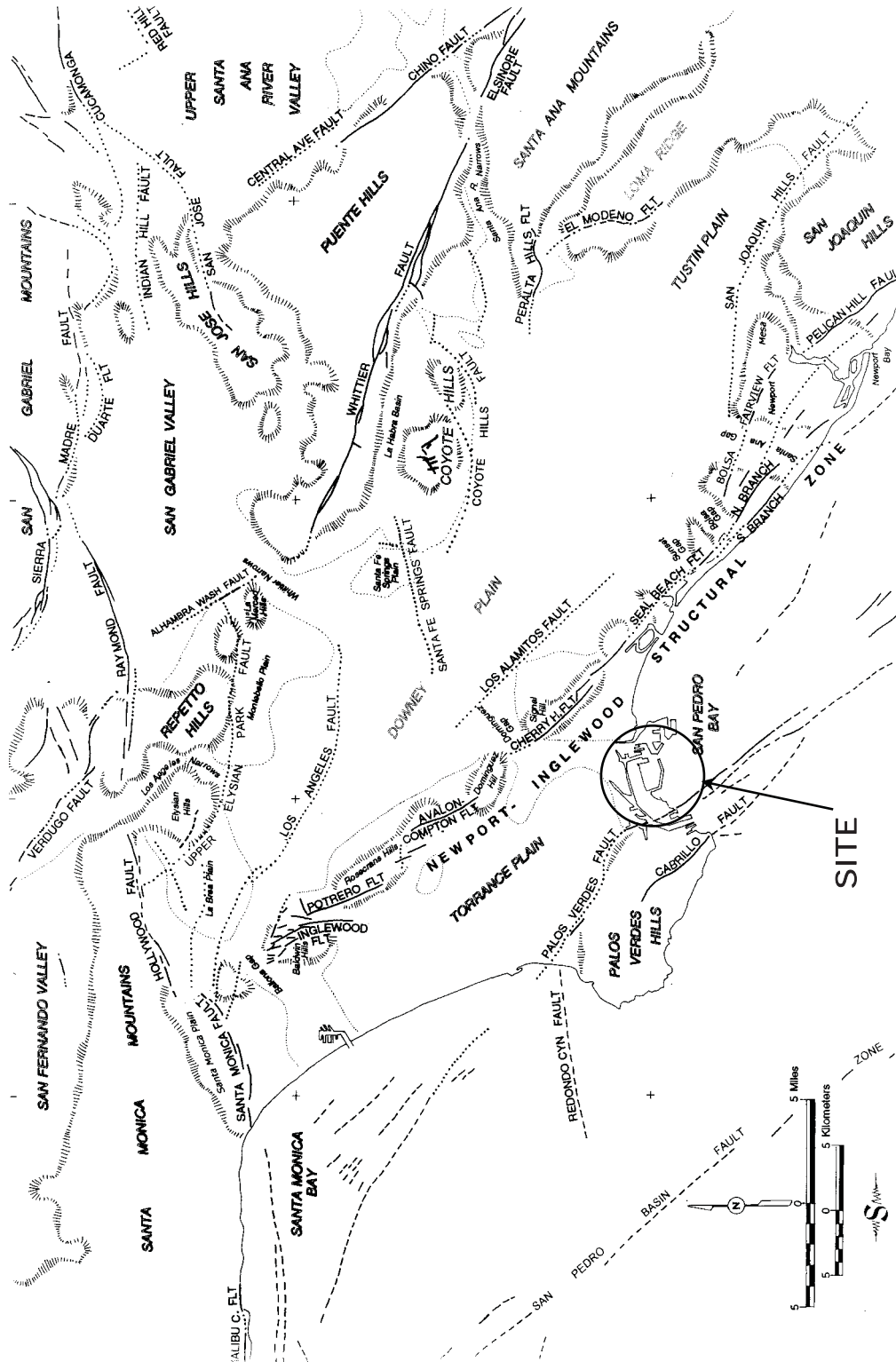


Figure 2-1. Regional Fault and Physiography Map

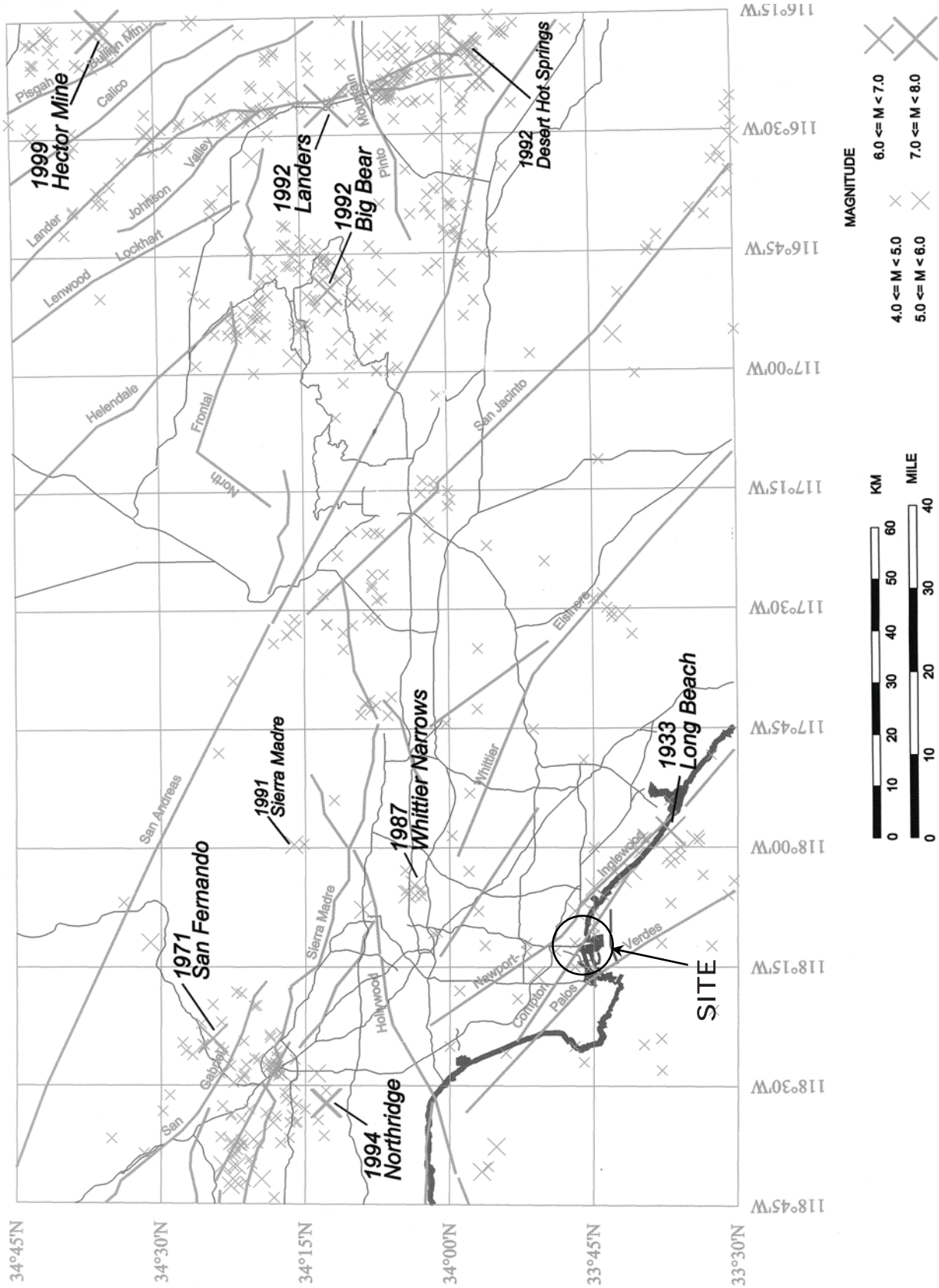


Figure 2-2. Seismicity Map

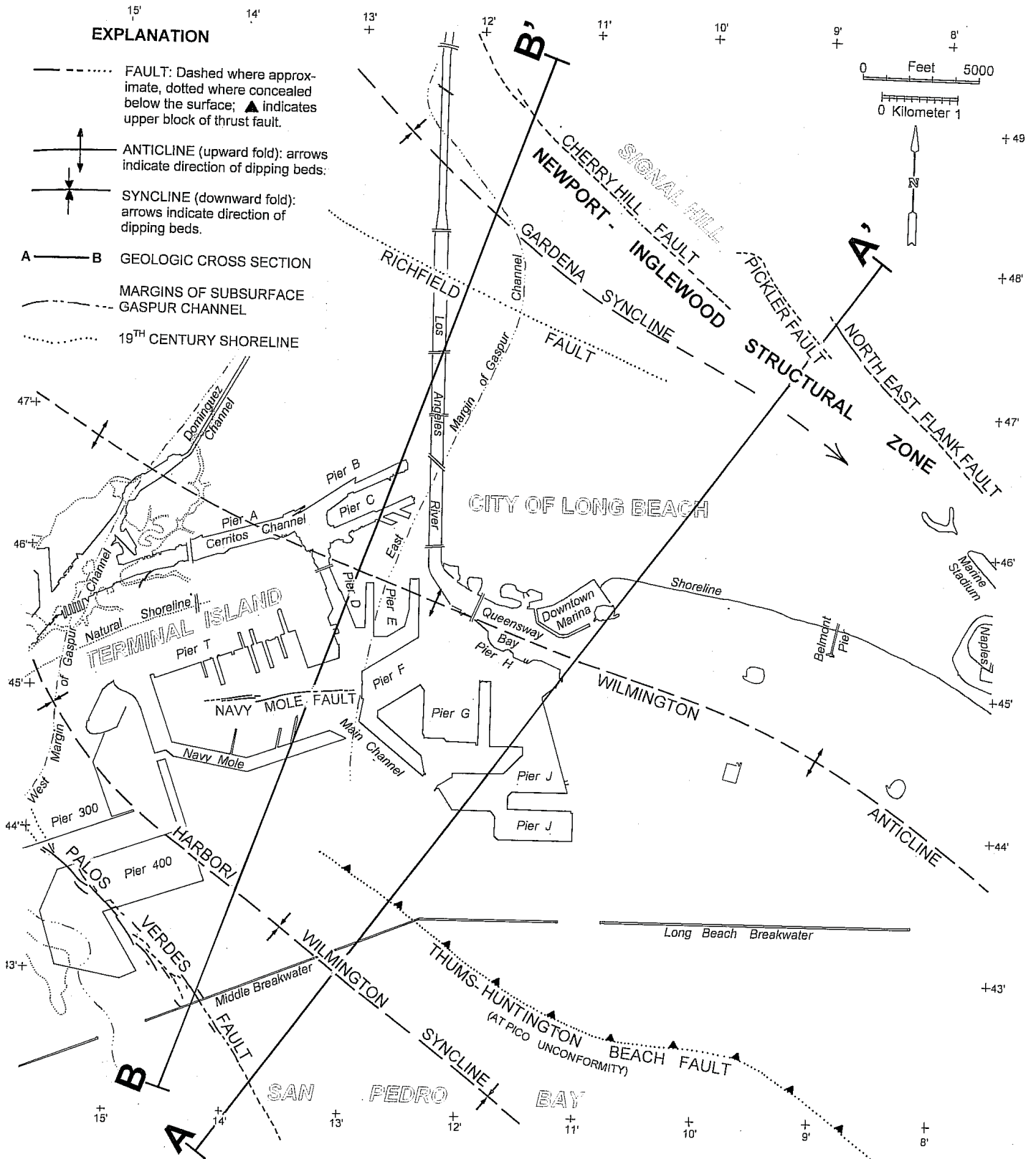


Figure 2-3. Geologic Structure Map of the POLB Area



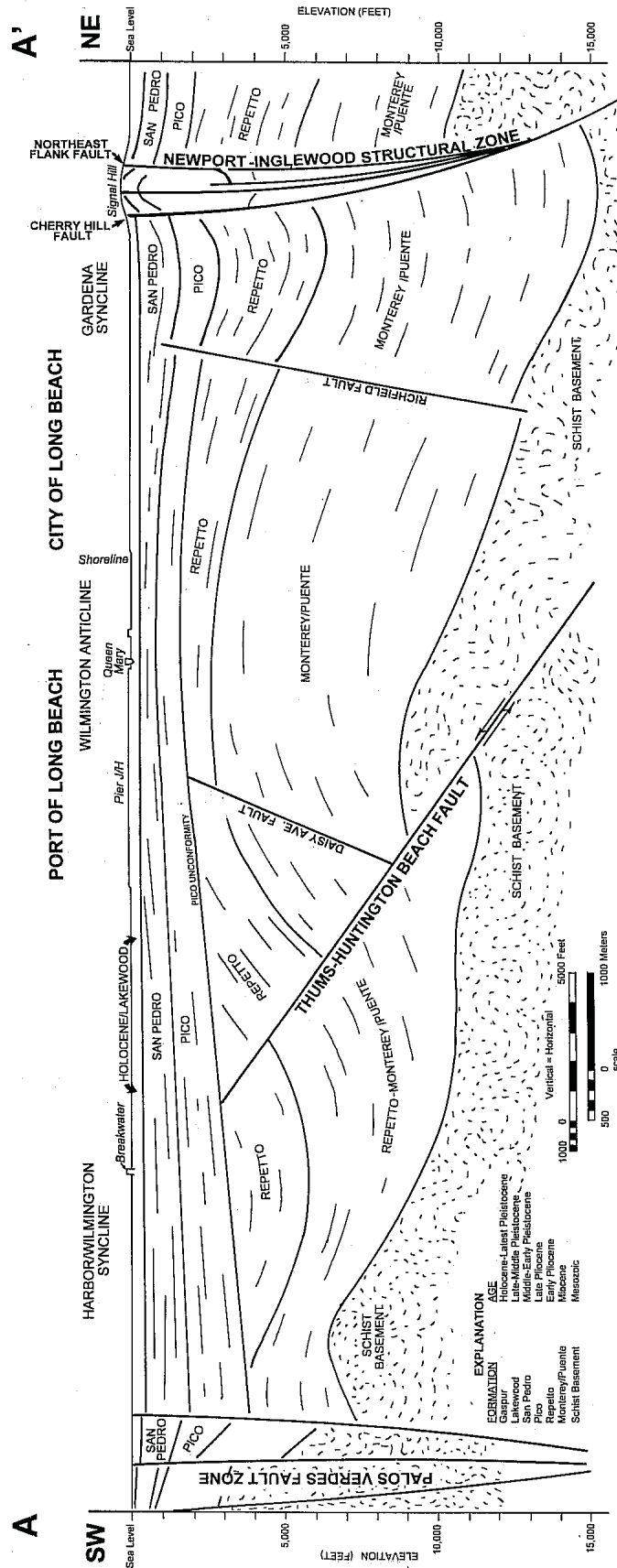


Figure 2-4. Geological Cross Section A-A'

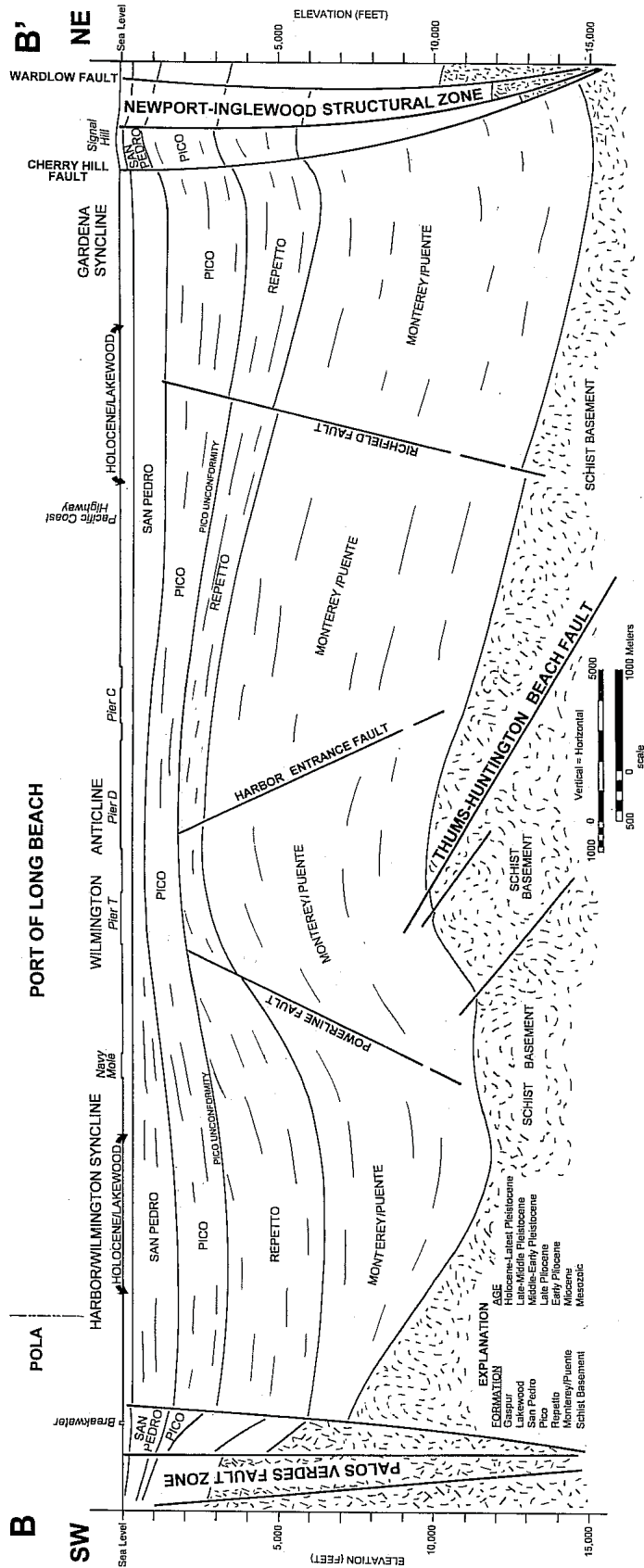


Figure 2-5. Geological Cross Section B-B'

Both the fill and the native near-shore sediments overlie similar older deposits of the late-Pleistocene-age Lakewood Formation, which in turn overlies the early Pleistocene San Pedro Formation (see Figure 2-4 and Figure 2-5). Differentiating the young sediments from the Lakewood or San Pedro formations is difficult in boreholes because of their similar origin and characteristics. Except for density, which is generally greater in the older Lakewood and San Pedro formations, the units can only be confidently differentiated by fossil analysis. Underlying strata comprise folded and faulted Pliocene- and Miocene-age formations, and the major angular Pico unconformity, separating the Quaternary and upper Pliocene sediments from lower Pliocene-Miocene deposits and Catalina Schist basement (see Figure 2-4 and Figure 2-5).

### 2.2.2 Geologic Structure

Several major folds and faults are apparent in the POLB area as shown on Figure 2-3, Figure 2-4, and Figure 2-5. The major folds are the Wilmington and Signal Hill anticlines, and the intervening Gardena and Harbor-Wilmington synclines. These folds are primarily the result of deformation along the Newport-Inglewood fault (NISZ), the THUMS-Huntington Beach (THB) fault, and the Palos Verdes fault. There are also numerous minor north-south trending cross-cutting faults in the region (see, for example, the Powerline, Harbor Entrance, and Daisy Avenue faults on Figure 2-4 and Figure 2-5), but these are largely secondary features and are inactive. Faults that contribute to the seismic hazard at the POLB, including the Newport-Inglewood and Palos Verdes faults, are discussed in Appendices A and B.

The Pico unconformity shown on Figure 2-4 and Figure 2-5 is a feature of tectonic significance. This unconformity indicates that the major folding of the Wilmington Anticline occurred prior to the Quaternary time. High-resolution, 3-dimensional, seismic-reflection data from the THUMS oil operations (Prior, 2004) clearly show that the THB fault is truncated at the Pico unconformity indicating that the fault has not been active since late Tertiary time. In contrast to the THB fault, the Palos Verdes and Newport-Inglewood faults extend to the surface and are associated with abundant Quaternary deformation and prominent surface uplifts such as the Palos Verdes Hills and Signal Hill. Increased activity on the NISZ in latest Tertiary and Quaternary time appears to coincide with the end of major activity on the THB fault.

A small amount of uplift has occurred in the area of the Wilmington Anticline since late Pliocene time, and some of this uplift appears to be Quaternary in age (Ponti, 2004; Edwards et al., 2002). This uplift is compatible with the regional compressional forces acting across the Los Angeles region. The compression can result in transpressional strike slip faulting, thrust faulting, and/or folding. Both the NISZ and the Palos Verdes faults are transpressional strike slip faults whereas the Wilmington anticline-syncline and Gardena syncline represent folding between the major faults. The documented uplift (Castle and Buchanan-Banks, 1989) in the Wilmington anticline area is associated with the 1933 Long Beach earthquake on the NISZ and represents evidence that at least some Quaternary-age folding of the Wilmington anticline is due to tectonics of the adjacent faults. Alternatively, thrusting on the subsurface Compton thrust ramp has been proposed as a cause of folding of the Wilmington anticline (Shaw, 1993).

## 2.3 GROUND CONDITIONS

Pier facilities at the POLB have been formed from natural coastal and man-made land masses, creating wide variations in ground conditions throughout the POLB area. Dredged fill materials have been used extensively in the construction of the man-made land masses. These materials generally are not considered representative of firm-ground conditions assumed in probabilistic hazard studies. An assessment of ground conditions was therefore undertaken to establish appropriate depths to firm-ground conditions and to assess appropriate site response behavior for design.

*Firm-ground* conditions were defined on the basis of average shear wave velocity. The average shear wave velocity  $\bar{v}_s$  was calculated as follows:

$$\bar{v}_s = \frac{\sum_{i=1}^n d_i}{\sum_{i=1}^n \frac{d_i}{v_{si}}} \quad (2.1)$$

where

$d_i$  = thickness of layer  $i$  (in ft), and  
 $v_{si}$  = shear wave velocity in layer  $i$  (in ft/sec).

The depth to firm ground was defined at the top of a 100-ft (30-m) depth interval that has a minimum average shear wave velocity  $\bar{v}_{s30}$  of approximately 1,000 ft/sec ( $\approx 300$  m/sec):

$$\bar{v}_{s30} = 1,000 \text{ ft/sec} = \frac{100 \text{ ft}}{\sum_{i=1}^n \frac{d_i}{v_{si}}} \quad (2.2)$$

Information sources and the methodology for the development of these depths at various locations at the POLB are described below.

### 2.3.1 Information Sources

The primary source of information for ground conditions at the POLB was past project-specific reports made available by the POLB. These comprised mainly geotechnical reports undertaken at berths, piers and other structures as listed in the bibliography in Section 9. The ground information contained in these geotechnical reports was in the form of boring investigations with Standard Penetration Test (SPT) data generally provided at 5-foot intervals, and Cone Penetration Test (CPT) soundings. Depths investigated were typically on the order of 100 ft.

Other sources of ground investigation information included shear wave velocities obtained from the ROSRINE database (ROSRINE, 2001) and several of the projects listed in the bibliography where geophysical testing was also performed.

### 2.3.2 Soil Profiles for Seismic Response

Soil profiles were established through evaluation of the available information to determine appropriate response parameters (shear wave velocity and density) and to establish expected depths to firm-ground conditions. As boring investigations represented most of the available information, evaluation efforts were largely concerned with assimilation of the various soil descriptions, SPT blowcount, and density data indicated. CPT sounding and shear wave velocity data served to supplement and support this information. Findings suggested a demarcation of the POLB into four areas denoted as Zones I, II, III and IV in which similar soil profiles were apparent. The approximate extents of these zones are shown in Figure 2-6.

The four idealized soil profiles and shear wave velocity profiles corresponding to each zone are shown in Figure 2-7. Shear wave velocity profiles were established by reconciling SPT blowcount and density data with available shear wave measurements and drawing on experience with similar ground conditions in the area. Density values assigned varied between 115 pcf (harbor sediments), 120 pcf (alluvial fill) and 125 pcf (alluvial/Gaspur deposits). Depths to firm-ground conditions were based on  $\bar{v}_s$  calculations using available shear wave velocity data and interpretation of SPT blowcounts in a similar manner. The profiles shown in Figure 2-7 end at depths corresponding to the defined firm-ground condition.

It should be noted that the available boring investigations, CPT soundings, and shear-wave velocity measurements provided data representative of ground conditions at specific locations only, and were not of sufficient extent to permit a comprehensive characterization. Therefore, the soil profiles presented are therefore only considered to be generally representative of local site conditions at the POLB. Specific ground investigations undertaken as part of a routine site investigation program are expected to establish which soil profile(s) are most appropriate on a site-by-site basis. This will also allow for the possibility of peculiar ground conditions that may require special attention.

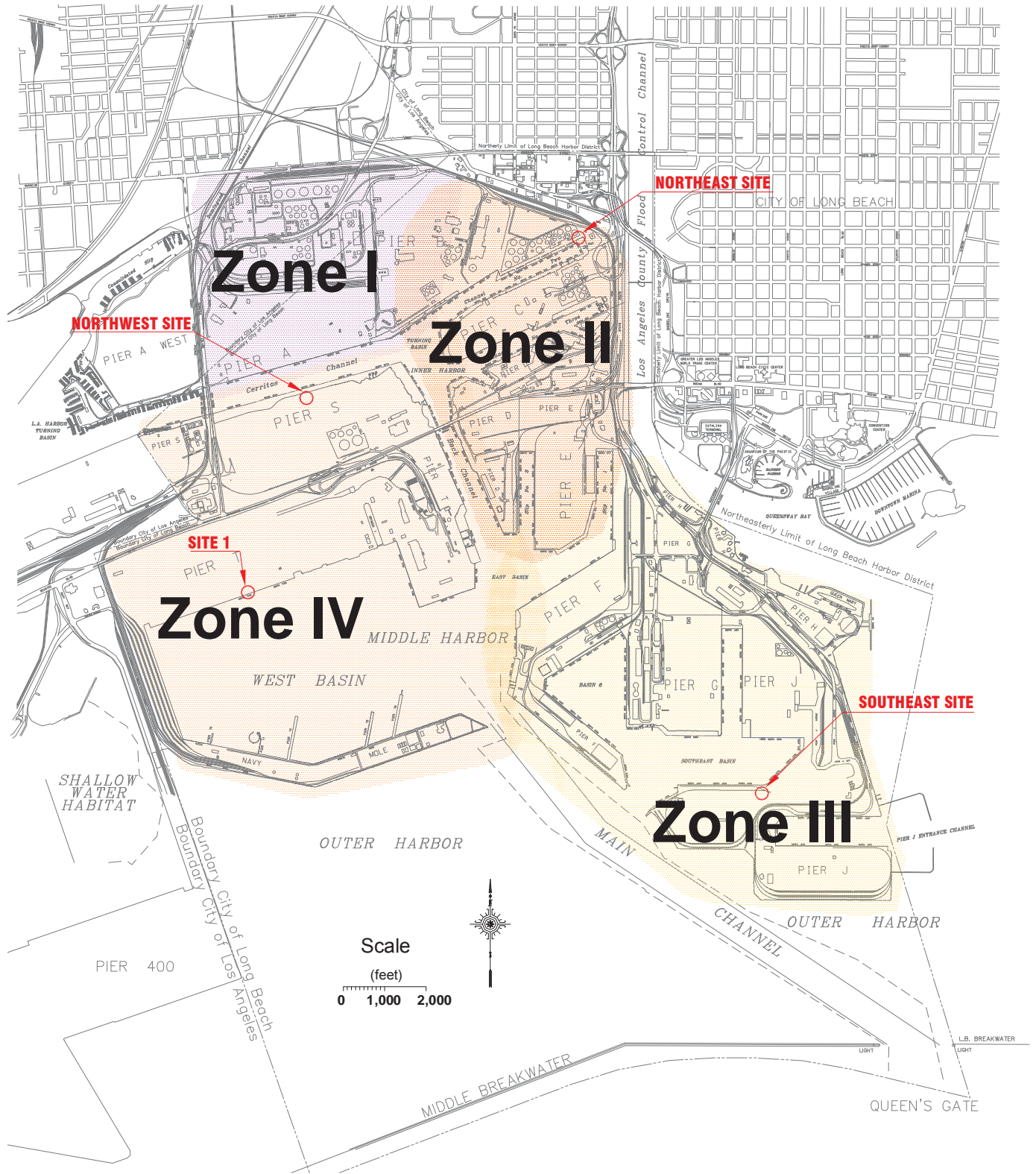


Figure 2-6. Soil Zones Used for Seismic Response Analyses

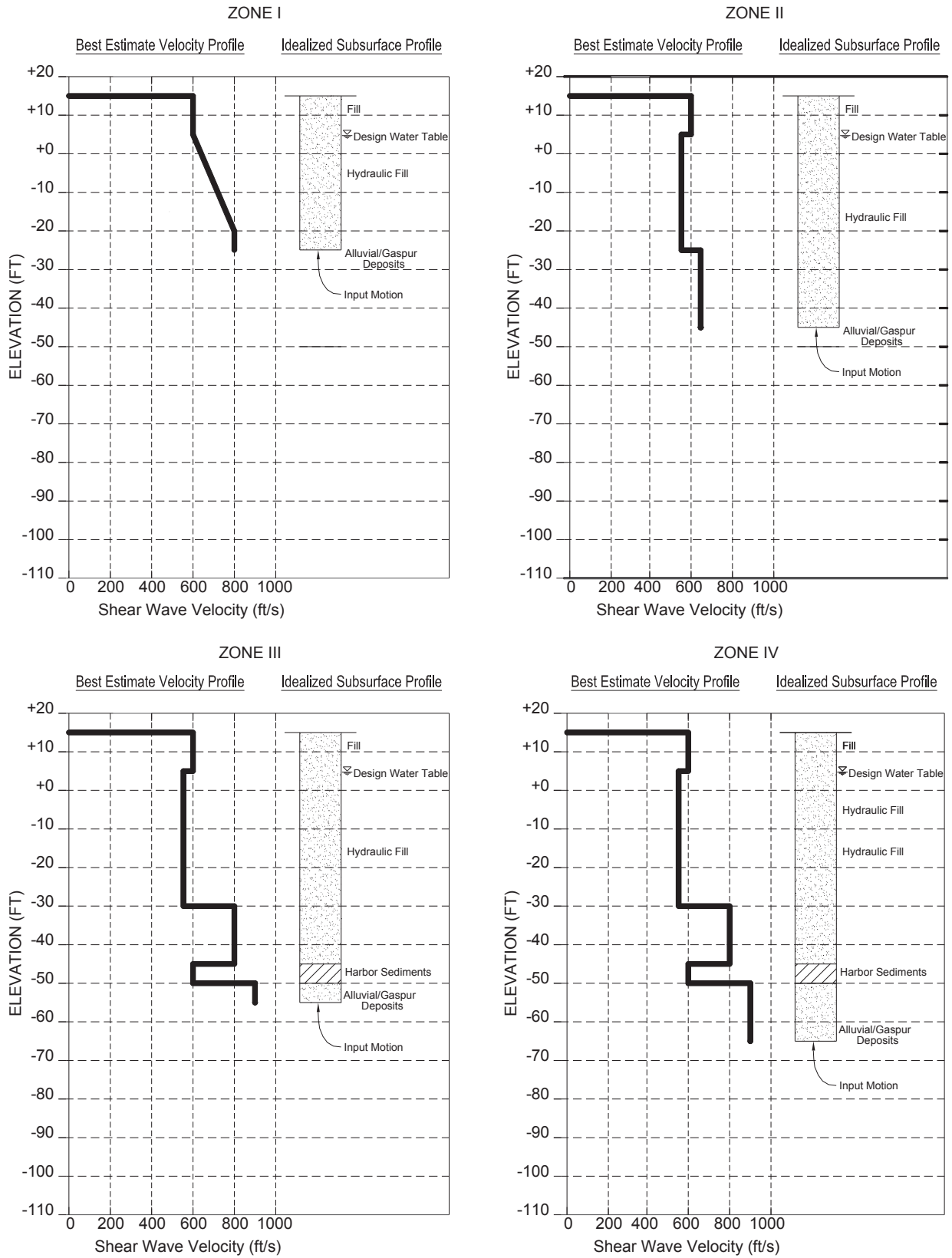


Figure 2-7. Idealized Soil Profiles Used for Seismic Response Analyses

## SECTION 3

# PROBABILISTIC SEISMIC HAZARD ANALYSIS

### 3.1 GENERAL

#### 3.1.1 PSHA Methodology

The probabilistic seismic hazard analysis (PSHA) follows the standard approach first developed by Cornell (1968). This approach has been expanded to more fully treat both the randomness (aleatory variability) and the scientific uncertainty (epistemic uncertainty). The mathematical formulation of the hazard analysis used in this study is described in Appendix C.1.

#### 3.1.2 Earthquake Sources

Key seismic sources at the POLB are the Palos Verdes and Newport-Inglewood fault zones, as shown in Figure 3-1. Other nearby, but less active, seismic sources include the Compton Thrust, THUMS-Huntington Beach fault, Cabrillo fault, and Los Alamitos fault. A detailed discussion of these faults is given in Appendix A, and details on the source parameters used for the probabilistic seismic hazard analysis are given in Appendix B. Table 3-1 and Table 3-2 provide a summary of these parameters.

The segmentation of the offshore Palos Verdes and Newport-Inglewood faults is not well known. For faults with unknown segmentation, it is common to assume that the characteristic magnitude would correspond to 1/2 of the fault length. To address the uncertainty in the segmentation, two segmentation models were considered: (1) an “unsegmented model” in which the full length of the offshore Palos Verdes and Newport-Inglewood faults are assumed to rupture, and (2) a “segmented model” in which 1/2 of the length of the two offshore faults are assumed to rupture. The segmentation model reduces the mean characteristic magnitude of the Palos Verdes and Newport-Inglewood fault by 0.25 and 0.30 magnitude units, respectively. The reduction for the Palos Verdes fault is smaller because the Palos Verdes Hills segment is assumed to fully rupture for both the segmented and unsegmented model. Table 3-1 and Table 3-2 include the parameters used for both models. The segmented and unsegmented models were given equal logic-tree weightings. For the San Pedro Basin fault, a similar segmentation would apply; however, just the unsegmented model was used for simplicity as this is not a controlling fault.

The other active faults in the region, shown on Figure 2-1, were included in the source characterization for completeness. These are included in Table 3-3 which lists the faults in the region recognized by the U.S. Geological Survey (USGS). Since these faults do not contribute significantly to the hazards, they were simply modeled using USGS fault parameters.



**Table 3-1. Summary of Seismic Source Parameters for Local Faults**

Fault (Map Abbreviation)	Depth to Top of Fault (km)	Depth to Bottom of Fault (km)	Dip (deg)	Slip Rate (mm/yr)	Mean Characteristic Earthquake, $M_w$	Style of Faulting <sup>1</sup>
Palos Verdes (PV-PVH, PV-SO)	0	11 to 18	90	2.0 to 4.0	6.65 to 7.2	Strike-Slip
Newport-Inglewood (NI)	0	13 to 16	90	0.5 to 1.5	6.7 to 7.2	Strike-Slip
Cabrillo (CAB)	0	15 to 18	70	0.1	6.25 to 6.5	Strike-Slip
San Pedro Basin (SPB)	0	15	90	0.5 to 1.0	7.1 to 7.2	Strike-Slip
Los Alamitos (LAL)	0	15	70	0.25 to 0.50	6.5	Strike-Slip
Compton Thrust (CT)	6	10	16	0.5 to 1.0	7.1 to 7.2	Reverse

**Table 3-2. Probabilistic Seismic Hazard Parameters and Logic-Tree Weightings**

Fault (Map Abbreviation)		Activity (Weighting)	Length in km	Width in km (Weighting)	Slip-Rate in mm/yr (Weighting)	Characteristic Earthquake Magnitude, $M_w$ (Weighting)
Palos Verdes Fault <sup>1</sup> (PV)	Palos Verdes Hill Segment (PVH)	Active (1.0)	12 (0.5)	15 (0.5) 18 (0.5)	2.0 (0.4) 3.0 (0.5) 4.0 (0.1)	6.9 <sup>u</sup> /6.65 <sup>s</sup> (0.225) 7.0 <sup>u</sup> /6.75 <sup>s</sup> (0.390) 7.1 <sup>u</sup> /6.85 <sup>s</sup> (0.275) 7.2 <sup>u</sup> /6.95 <sup>s</sup> (0.110)
	Southern Offshore Segment (SO)		50 <sup>u</sup> /25 <sup>s</sup> (0.5)	11 (0.2) 13 (0.6) 15 (0.2)		
Newport-Inglewood (NI)		Active (1.0)	65 <sup>u</sup> /33 <sup>s</sup> (0.5)	13 (0.5) 16 (0.5)	0.5 (0.2) 1.0 (0.6) 1.5 (0.2)	7.0 <sup>u</sup> /6.7 <sup>s</sup> (0.33) 7.1 <sup>u</sup> /6.8 <sup>s</sup> (0.50) 7.2 <sup>u</sup> /6.9 <sup>s</sup> (0.17)
Cabrillo (CAB)		Active (1.0)	18 (0.5)	15 (0.5) 18 (0.5)	0.1 (1.0)	6.4 (0.25) 6.5 (0.75)
San Pedro Basin (LAL)		Active (1.0)	70 (0.5)	15 (1.0)	0.5 (0.6) 1.0 (0.4)	7.1 (0.50) 7.2 (0.50)
Los Alamitos (LAL)		Active (1.0)	35 (0.5)	15 (1.0)	0.25 (0.5) 0.5 (0.5)	6.5 (1.0)
Compton (CT) - Los Alamitos Fault Zone/Thrust Ramp <sup>2</sup>		Active (0.2) Inactive (0.8)	70 (0.5)	20 (1.0)	0.5 (0.5) 1.0 (0.5)	7.1 (0.67) 7.2 (0.33)

**Notes:** Logic-tree weightings are given in parentheses.

1) The Santa Monica Bay segment of the Palos Verdes fault is modeled as a separate, inactive segment with zero slip rate (see discussion in Appendix B).

2) If THUMS-Huntington Beach fault is active, it is included as part of Compton-Los Alamitos fault (see discussion in Appendix B).

u) Unsegmented model

s) Segmented model

**Table 3-3. Seismic Source Parameters for Other Faults Based on Best-Estimate Values from USGS**

Fault (Map Abbreviation)	Depth to Top of Fault (km)	Depth to Bottom of Fault (km)	Dip (deg)	Slip Rate (mm/yr)	Mean Characteristic Earthquake Magnitude, $M_w$	Style of Faulting <sup>1</sup>
Whittier (WH)	0	15	75 NE	2.5	6.8	R/O
Santa Monica (SN)	0	13	75 N	1.0	6.6	R/O
Hollywood (HY)	0	13	70 N	1.0	6.4	R/O
Malibu Coast (MC)	0	13	75 N	1.0	6.7	R/O
Sierra Madre (San Fernando) (SM-SF)	0	13	45 N	2.0	6.7	R
Sierra Madre (SM)	0	13	45 N	2.0	7.2	R
Cucamonga (CM)	0	13	45 N	5.0	6.9	R
Santa Susana (SS)	0	13	55 N	5.0	6.7	R
Raymond (RY)	0	13	75 N	1.5	6.5	R/O
Chino (CH)	0	18	90	1.3	6.7	O
Verdugo (VD)	0	13	45 NE	0.5	6.9	R
San Jose (SJS)	0	13	75 NW	0.5	6.4	R/O (?)
San Gabriel (SG)	0	13	90	1.0	7.2	SS
San Andreas – Carrizo (SA-C)	0	12	90	34.0	7.4	SS
San Andreas – Mojave (SA-M)	0	12	90	30.0	7.4	SS
San Andreas – San Bernardino Mountains (SA-SBM)	0	18	90	24.0	7.5	SS
San Jacinto (San Jacinto Valley & San Bernardino) (SJ-SJV+SB)	0	15	90	12.0	7.0	SS
San Jacinto (Anza) (SJ-A)	0	15	90	12.0	7.0	SS
Elsinore (EL)	0	15	90	15.0	7.0	SS
Northridge (NR)	5	20	42 S	1.5	7.0	R
Upper Elysian Park (EP)	3	13	50 NE	1.3	6.4	R
Puente Hills	5	13	25 N	0.7	7.1	R
San Joaquin Hills (SJH)	2	8	23 S	0.5	6.6	R

Notes: 1) R = Reverse; O = Oblique; SS = Strike-Slip

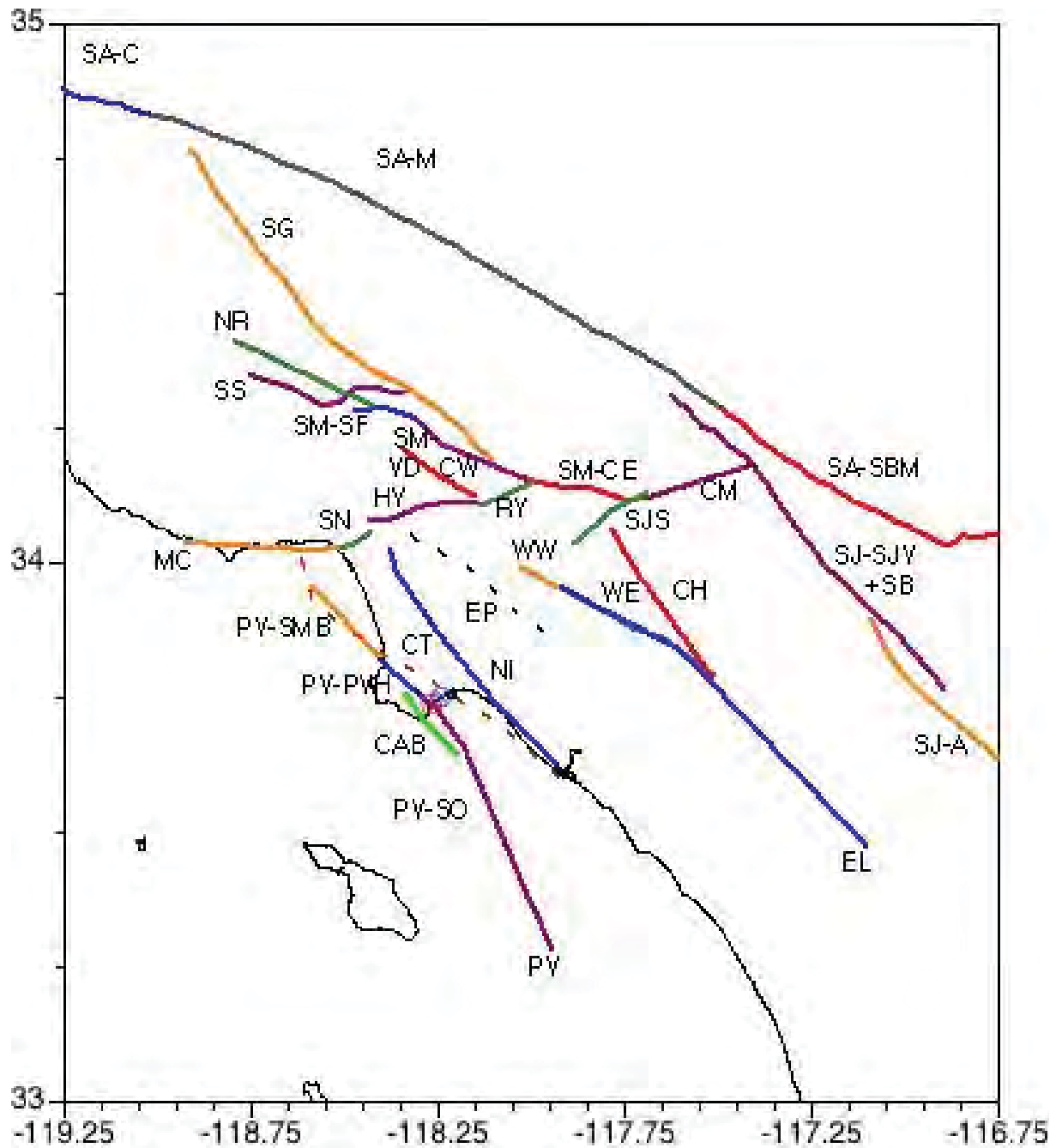


Figure 3-1. Map of Principal Fault Sources Used in PSHA

### 3.1.3 Earthquake Rupture Dimensions

Earthquake rupture dimensions were established using three magnitude-area relations reported by Wells and Coppersmith (1994), USGS, and Hanks and Bakun (2002), as given below by Equations (3.1), (3.2) and (3.3), respectively.

$$M = 3.98 + 1.02 \log A \quad (3.1)$$

$$M = 4.2 + \log A \quad (3.2)$$

$$\begin{aligned} M &= 3.98 + \log A && \text{for } A \leq 468 \text{ km}^2, \text{ and} \\ M &= 3.09 + \frac{4}{3} \log A && \text{for } A > 468 \text{ km}^2 \end{aligned} \quad (3.3)$$

where

$M$  = magnitude, and  
 $A$  = rupture area in km.

The latter two models are used in the USGS source models. The Wells and Coppersmith (1994) model is included because there is support for this model from numerical modeling (Somerville et al., 1999).

### 3.1.4 Earthquake Recurrence Models

The approach used to derive the magnitude recurrence is to balance the long-term moment-rate on the faults. Given this approach, the Youngs and Coppersmith (1985) characteristic earthquake model is used for the magnitude probability density function (pdf). The standard truncated exponential model is not considered because it tends to overestimate the rate of moderate magnitude earthquakes when moment-rate is balanced. The Youngs and Coppersmith model is a combination of a pure characteristic model and an exponential model. The key aspect of the Youngs and Coppersmith model is that about 94% of the moment-rate is accommodated in characteristic earthquakes and only about 6% of the total moment-rate is accommodated by the exponential tail.

## 3.2 ATTENUATION MODELS

### 3.2.1 Site Classification for Ground Motion

The site classification for *firm ground* was characterized with average shear wave velocities of 300 m/sec ( $\approx 1,000$  ft/sec) over a depth of 30 m ( $\approx 100$  ft). This site classification is best correlated with typical “soil” site classifications of published empirical attenuation relationships.

### 3.2.2 Standard Attenuation Models

A total of three standard empirical attenuation relationships for soil site conditions were used: Sadigh et al. (1997), Abrahamson and Silva (1997) and Campbell (1997). The depth to basement bedrock for the Campbell (1997) attenuation relationship was set to 4.0 km for soil site conditions. All three empirical attenuation relationships were for a spectral damping of 5%. These models were given equal weight.

### 3.2.3 Updated Attenuation Models

The suite of ground motion attenuation relationships commonly used in California for shallow crustal earthquakes are currently being revised as part of the PEER/Lifelines Next Generation Attenuation (NGA) project. These new models are based on a greatly expanded and improved empirical database. In particular, there is a great increase in the number of recordings from large magnitude earthquakes resulting from the 1999 Kocaeli (M7.5), 1999 Chi-Chi (M7.6), 1999 Duzce (M7.1), 2000 Hector Mine (M7.1), and 2002 Denali (M7.9) events. The ground motions from these large-magnitude events are smaller than predicted by the existing attenuation relations. Three preliminary NGA models were presented at the December 3, 2004 PEER/Lifelines workshop. Two of these models (Abrahamson and Silva, and Campbell and Bozorgnia) showed a significant reduction in the median ground motion for large magnitudes ( $M > 7$ ) as compared to the existing models. There is also an increase in the standard deviation for large magnitudes for all three models.

To represent these new models, the Abrahamson and Silva (2005) preliminary model (which was the only model available to the EMI team at the time of this study) was used. The formulation of this model is provided in Appendix C.2. A weight of 1/3 was given to the new preliminary Abrahamson and Silva model and the standard models were given a total weight of 2/3.

### 3.2.4 Directivity Effects

A major component in the subject port-wide seismic hazard study was to update the attenuation relationships in order to better model rupture directivity effects observed account for lessons learned from strong motion recordings from recent major seismic events around the world. Those recordings provided information relevant to POLB and POLA design conditions resulting from the fact that the port is located relatively close to major faults. Lessons from recent earthquakes led to the observation that there is a tendency for much stronger ground shaking at sites near an earthquake fault for a scenario when the fault rupturing process is propagating toward the project site as opposed to fault rupturing away from the site. For such forward-rupturing events, the long-period motion ground shaking would have larger amplitude in the fault-normal direction (i.e. in the direction perpendicular to the fault) as compared to the fault-parallel direction.

In the course of the project, we have incorporated information from the latest attenuation models in available literature (including research data developed from the recent San Francisco-Oakland Bay Bridge East Span Seismic Safety project on which Earth Mechanics served as the geotechnical consultant) into our port-wide seismic hazard study with regards to near-fault directivity aspects.

The (average) horizontal motion attenuation relations (average of the two horizontal components of ground motion) available in the literature were adjusted to account for near-fault directivity effects using a modified form of the Somerville et al. (1997) fault-rupture directivity model developed in the course of the Bay Bridge East Span project. Somerville et al. (1997) developed an empirically-based model quantifying the effects of rupture directivity on horizontal response spectra that can be used to scale the average horizontal component computed from attenuation relations. The Somerville et al. (1997) model comprises two period-dependent scaling factors that may be applied to any ground motion attenuation relationship. The first factor accounts for

the increase in shaking intensity in the average horizontal component of motion due to near-fault rupture directivity effects. The second factor reflects the directional nature of the shaking intensity (i.e., response spectrum amplitude) using two ratios: fault normal (FN) and fault parallel (FP) versus the average (FA) component ratios. The fault-normal component is taken as the major principal axis resulting in an FN/FA ratio larger than 1, and the fault parallel component is taken as the minor principal axis with an FP/FA ratio smaller than 1. The two scaling factors depend on whether fault rupture is acting in the forward or backward direction, and also the length of fault rupturing toward the site. The degree of ground shaking increase for near-fault forward rupturing and the FN/FA ratios was accounted for by an additional rupture directivity parameter in the probabilistic hazard analysis. Directivity effects become stronger as the return period increases. For directivity effects to be strong, the return period of the ground motion must be at least twice the recurrence interval of characteristic size earthquakes. For shorter return periods, such as the 72-year return period OLE, there is no effect from rupture directivity. For longer return periods, (e.g., the 475-year CLE), the effects of rupture directivity is non-zero, but is still small.

The ground motions are developed for the fault normal component. At long spectral periods, the ground motions on the fault normal component will be larger than on the fault parallel component due to directivity effects.

### 3.3 PROBABILITY COMPUTATION

The OLE and CLE events were identified by the POLB as having a 50% and 10% probability of exceedance in 50 years (72 and 475-year return period), respectively. The hazard is computed for a site at the western end of the Port within Pier T (118.2367°W, 33.7533°N). This site (hereafter referred to as “Site 1”) was selected because it is in the area of the Port that is closest to the Palos Verdes fault and is expected to experience larger ground motions than at other locations in the port area, particularly for the CLE event. A comparison of the hazard at other locations given in Section 3.3.3 shows that for the CLE, the hazard at Site 1 is slightly higher than other locations, while the hazard for the OLE is generally unchanged (less than 5% difference between the highest and lowest values) within the POLB area.

#### 3.3.1 Seismic Hazard Results

The seismic hazard is computed at 12 spectral periods from 0 to 4 sec for the fault normal and fault parallel components. The mean hazard by seismic source for peak ground acceleration (PGA) is shown in Figure 3-2 and spectral acceleration (Sa) for  $T = 1.0$  sec in Figure 3-3. These plots show that the hazard at the Port is dominated by the Palos Verdes fault for return periods greater than about 200 years (approximate annual probability of exceedance  $1/200=0.005$ ).

The epistemic uncertainty in the hazard due to the alternative models considered in the logic tree is shown in Figure 3-4 for PGA. The uncertainty in the source models and ground motion models leads to 10-15% uncertainty in the PGA for return periods of 200-1,000 years. This is a typical uncertainty range for sites close to well-characterized seismic sources. The sensitivity of the mean hazard to the selection of the attenuation relation is shown in Figure 3-5 for PGA. The new Abrahamson & Silva (2005) model falls within the range of the previous models for return periods of 200-500 years. At longer return periods, the increase in the standard deviation for

larger earthquakes relative to the 1997 Abrahamson and Silva attenuation model leads to higher ground motions.

### 3.3.2 Deaggregation

The deaggregation for PGA for the 72-yr and 475-yr return periods is shown in Figure 3-6 and Figure 3-8, respectively. For the 72-yr return period, there is a wide range of events that contribute to the hazard. The dominant sources are M6.5–7.5 earthquakes for distances of 0 to 100 km. For the 475-yr return period, the hazard is dominated by the same magnitude range, but short distances (0 to 5 km). Similar deaggregation for  $T = 1$  sec spectral acceleration is shown in Figure 3-7 and Figure 3-9 for the OLE and CLE, respectively. The controlling events based on the deaggregation at  $T = 1$  sec are similar to the controlling events for PGA.

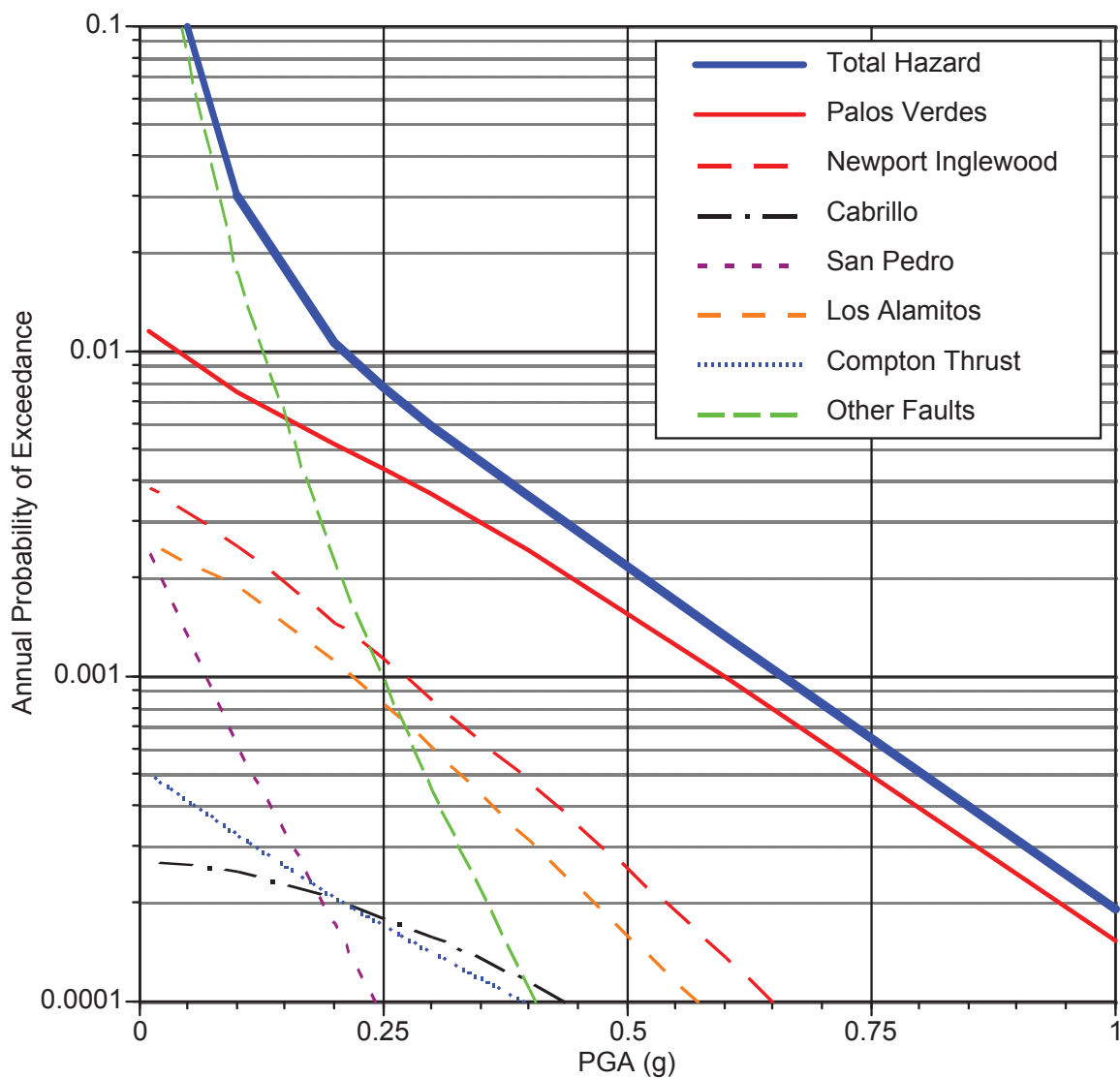


Figure 3-2. Peak Ground Acceleration (PGA) Hazard by Source

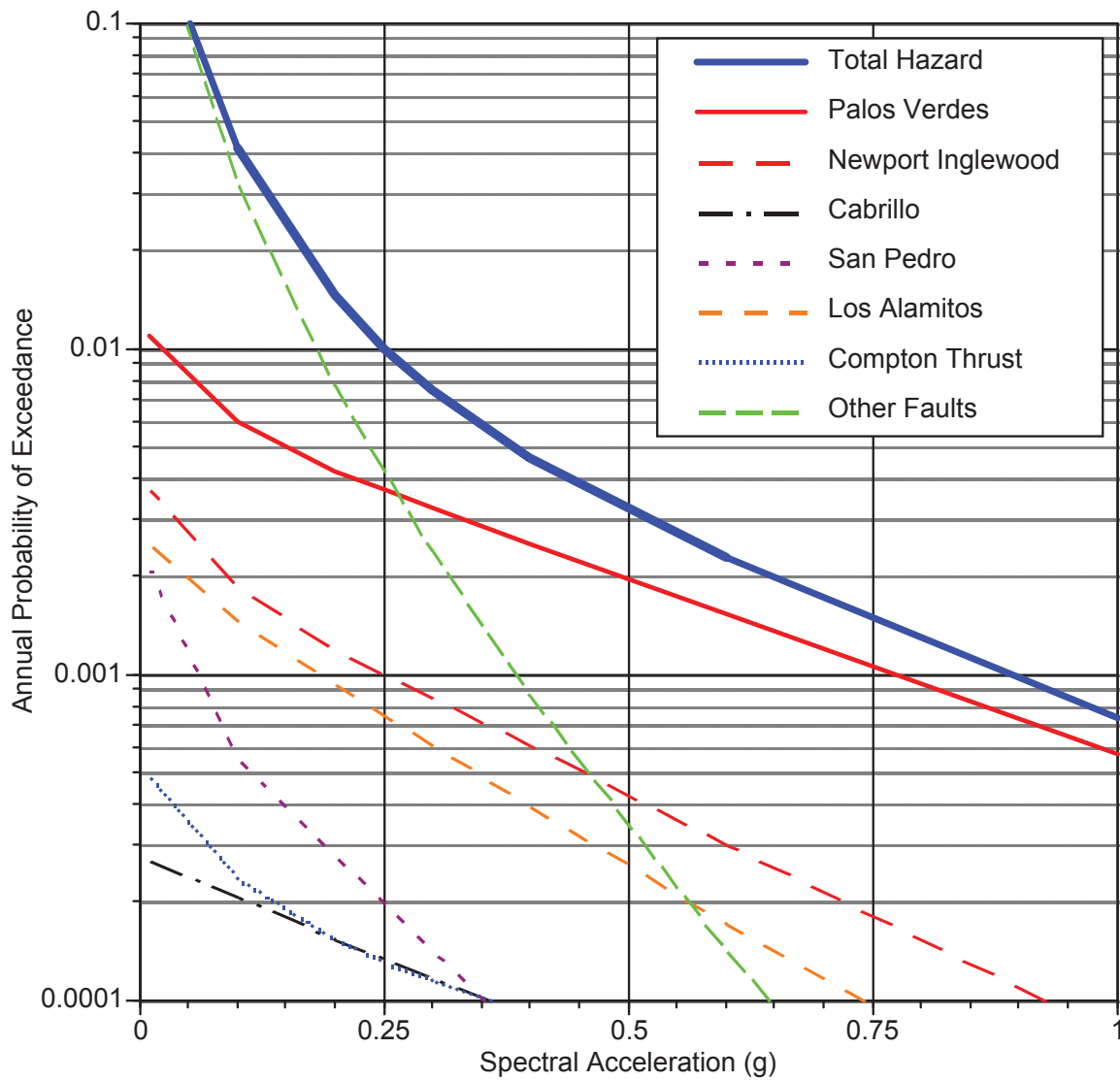


Figure 3-3. T = 1.0 sec Spectral Acceleration Hazard by Source



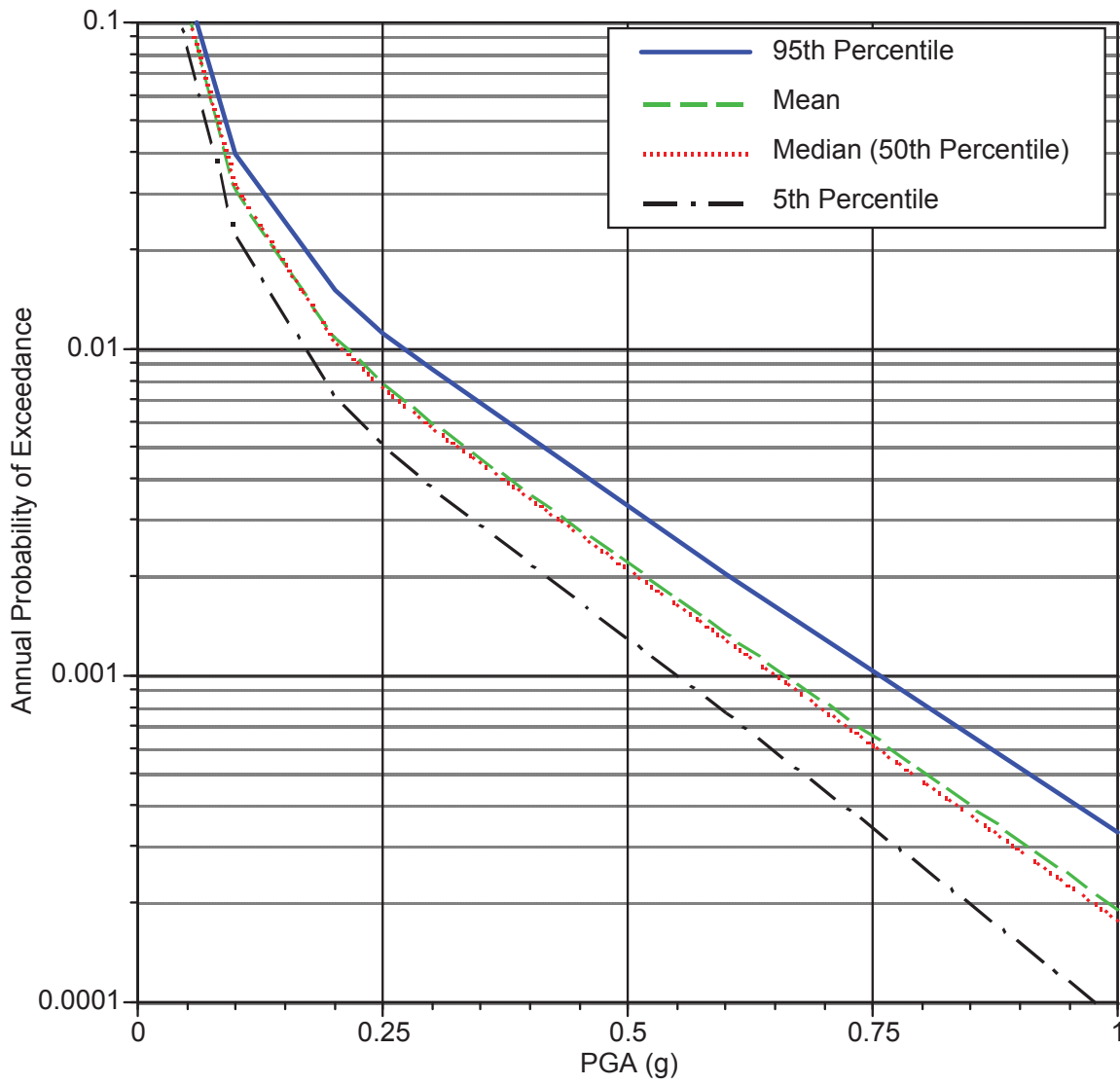


Figure 3-4. Fractiles of the PGA Hazard Due to the Logic Tree

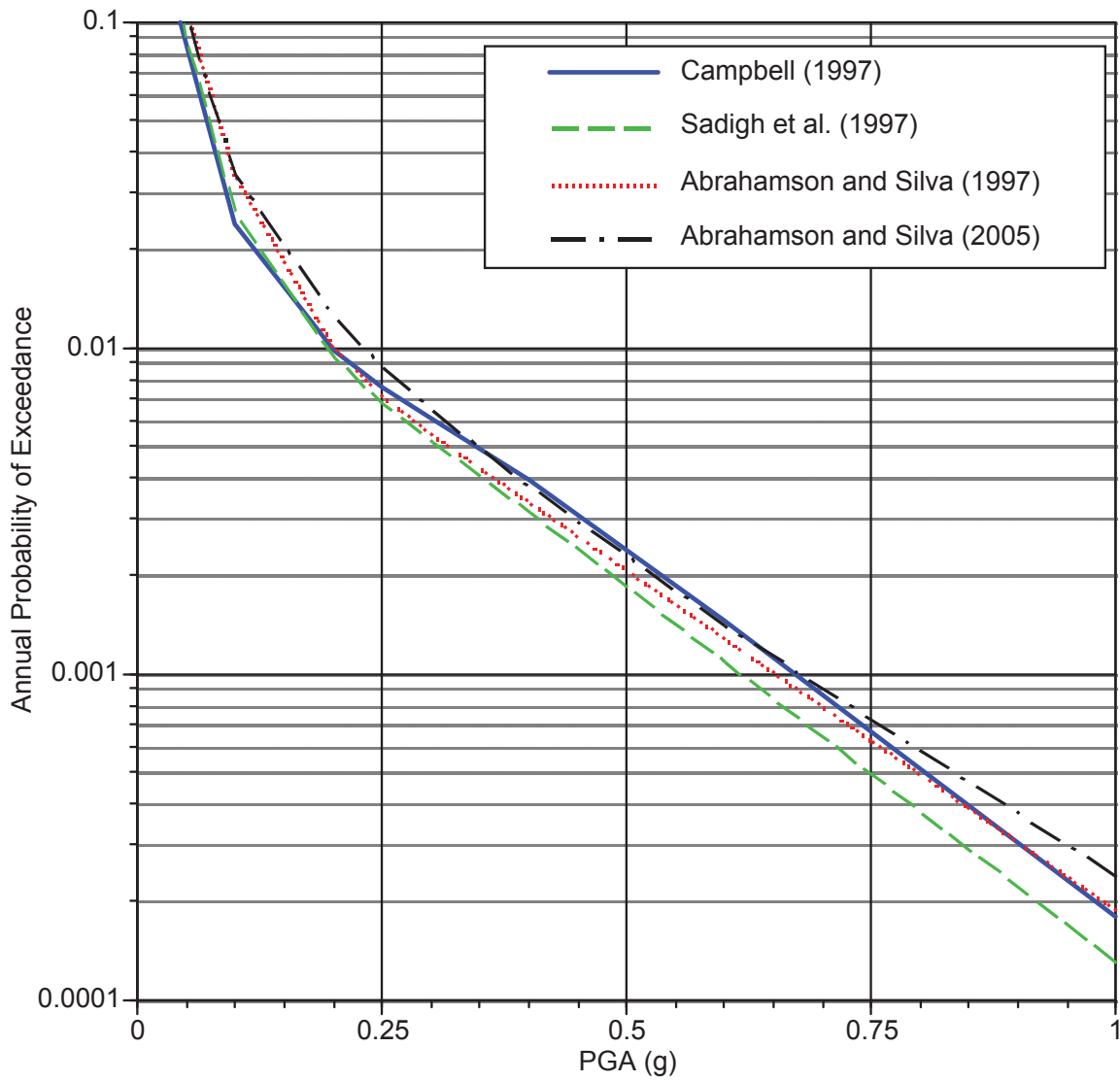


Figure 3-5. Sensitivity of PGA Hazard to the Attenuation Relation

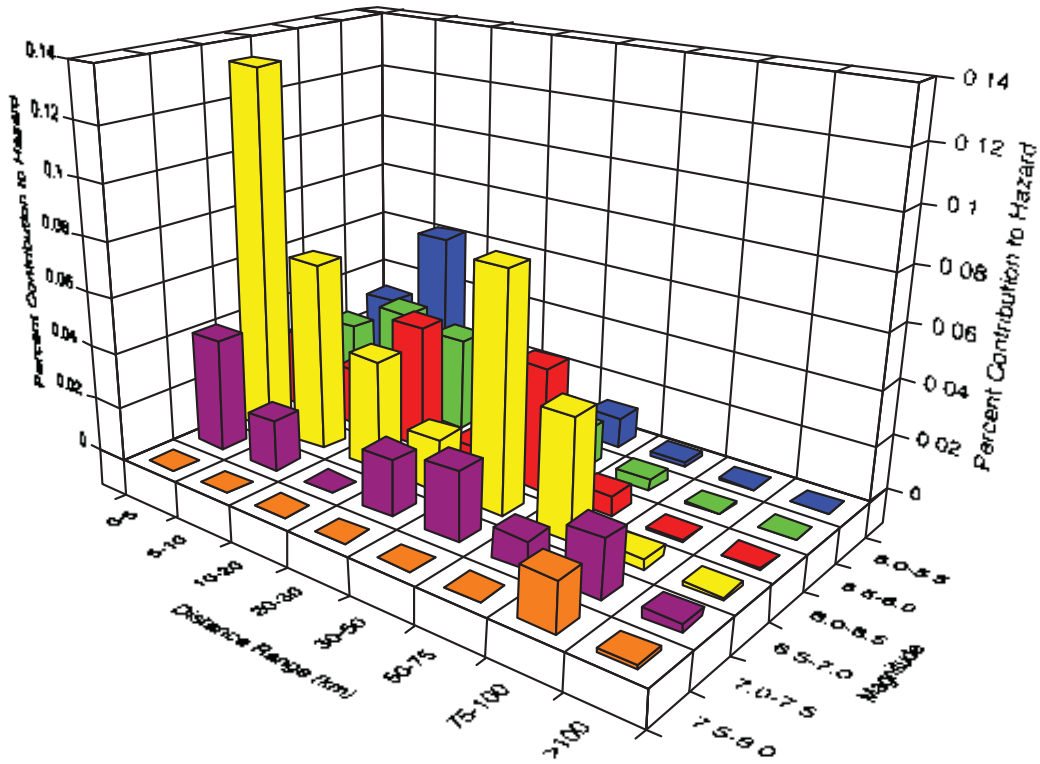


Figure 3-6. Deaggregation for PGA for 72-yr Return Period (OLE)

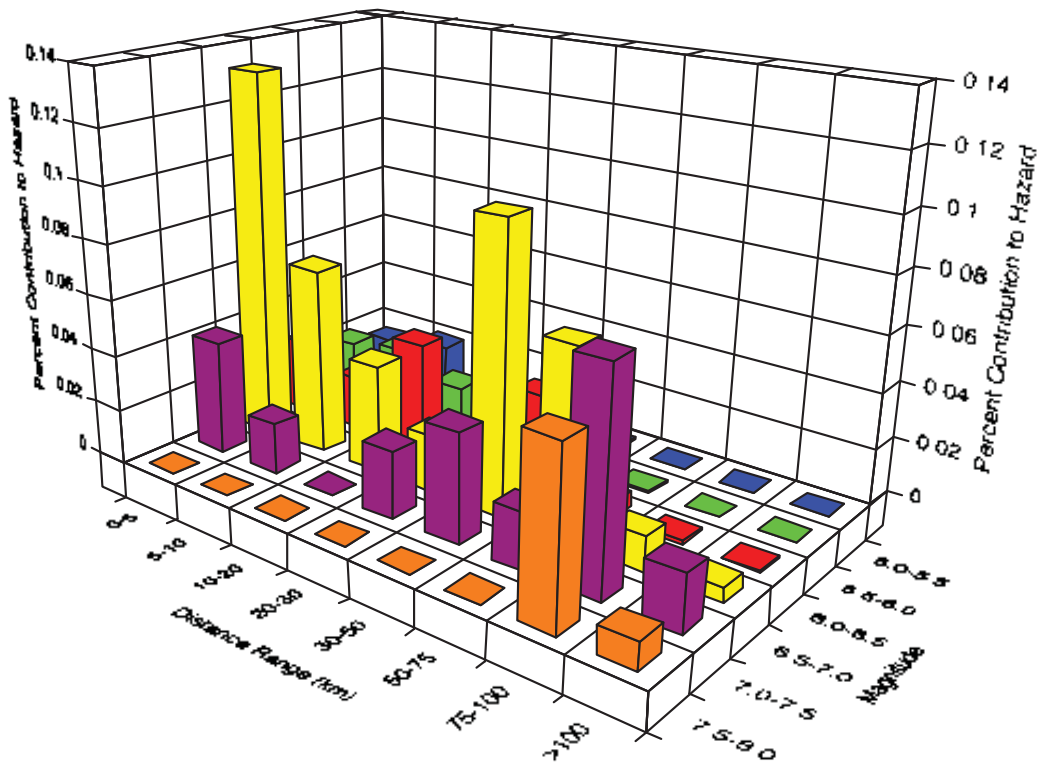


Figure 3-7. Deaggregation for T = 1.0 sec for 72-yr Return Period (OLE)

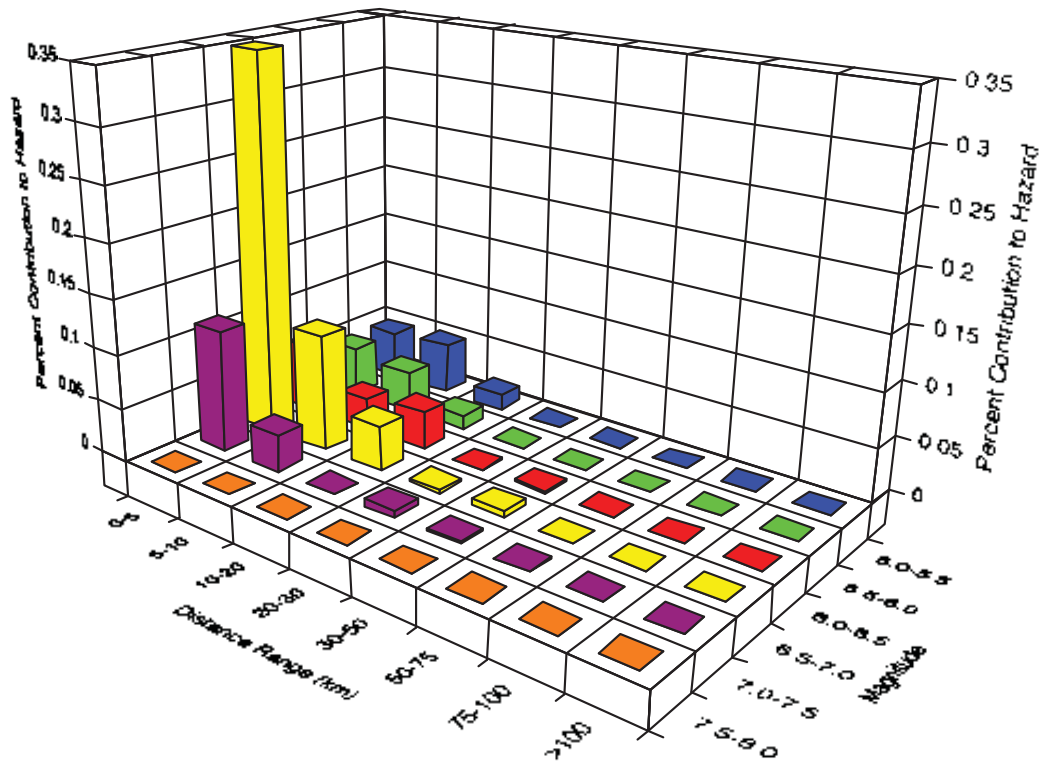


Figure 3-8. Deaggregation for PGA for 475-yr Return Period (CLE)

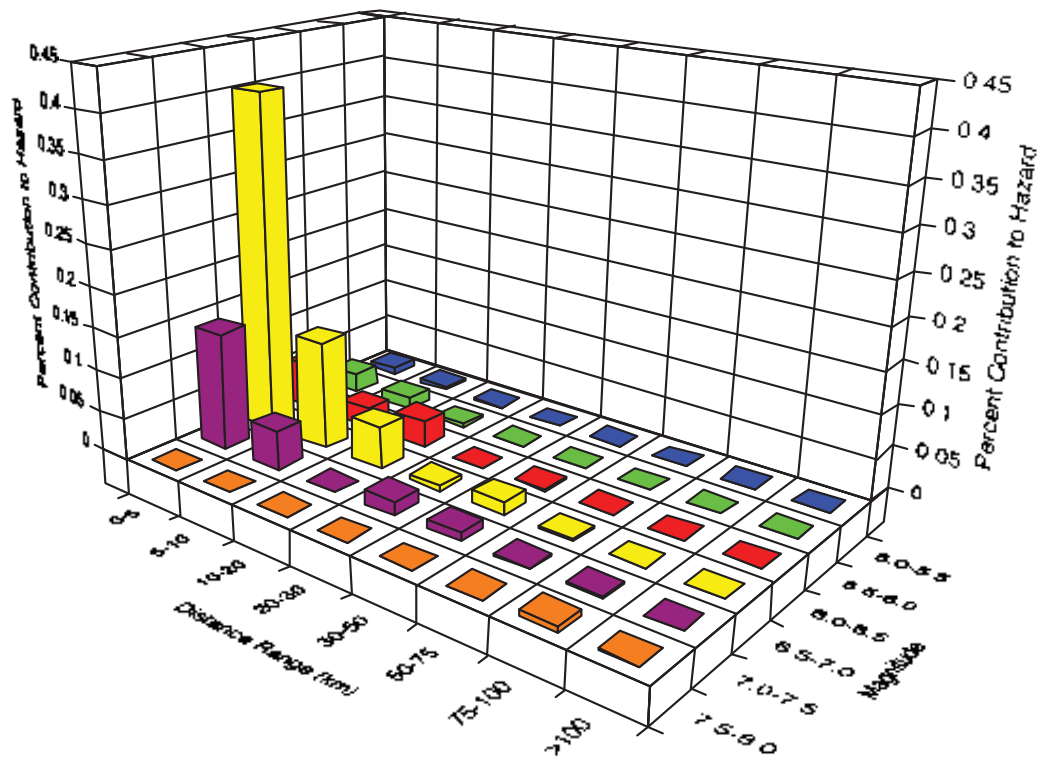


Figure 3-9. Deaggregation for T = 1.0 sec for 475-yr Return Period (CLE)

### 3.3.3 Uniform Hazard Spectra for Firm Ground

The horizontal (FN and FP) and vertical (FV) components of the uniform hazard spectra for firm ground and return periods of 72 and 475 years are shown in Figure 3-10 and Figure 3-11, respectively. The spectral coordinates are listed in Table 3-4. These spectra are for Site 1 within Pier T at the western end of the Port which is located closest to the Palos Verdes fault zone. The spectra were extrapolated to a period of 10 sec based on empirical spectral shapes (normalized at  $T = 2$  sec) of empirical ground motions that are reliable out to  $T = 10$  sec.

The vertical spectrum is computed using the horizontal UHS with a V/H ratio. The V/H ratio is computed for the 72-yr (OLE) and 475-year (CLE) return periods using the Abrahamson and Silva (1997) model for the dominant source (M, R) identified in the deaggregation. For the OLE, the dominant source is a  $M6.5 \pm$  earthquake at a distance of about 20 km. For the CLE, the dominant source is a  $M7.0 \pm$  earthquake at a distance of about 4 km. The V/H ratios for these two hazard levels are shown in Figure 3-12. Note that the V/H ratio is not the commonly assumed value of  $2/3$ . At short periods, the V/H ratio is greater than  $2/3$  and at moderate and long periods, the V/H ratio is less than  $2/3$ .

Table 3-5 shows the average horizontal spectral acceleration and pseudo relative displacement values for various damping levels (1%, 2%, 5%, 10%, 20%, and 25%) for the OLE event. Table 3-6 shows the spectral values for the CLE event.

The firm-ground UHS in Table 3-4 is for Site 1 which is located at Pier T ( $118.2367^\circ\text{W}$ ,  $33.7533^\circ\text{N}$ ) at the western end of the Port closest to the Palos Verdes fault zone. To evaluate the variability of the UHS across the Port, the UHS for both return periods was computed for three alternative locations:

- Southeast Site/Pier J ( $118.1958^\circ\text{W}$ ,  $33.7400^\circ\text{N}$ ),
- Northeast Site/Pier C ( $118.2103^\circ\text{W}$ ,  $33.7771^\circ\text{N}$ ), and
- Northwest Site/Pier S ( $118.2319^\circ\text{W}$ ,  $33.7664^\circ\text{N}$ ).

The site locations are shown on the map of Figure 2-6. The average horizontal UHS at these sites are shown in Figure 3-13 for the 72-yr return period (OLE) and Figure 3-14 for the 475-yr period. The figures show that the UHS are similar among all sites (within 5%). The hazard is slightly higher at the Site 1 for the CLE.

Figure 3-15 shows the average horizontal FN and FP components of the firm-ground UHS for return periods of 72 (OLE), 100, 300, 475 (CLE), 1000, 1500, 2000 and 2500 years for Site 1 and 5% damping. Table 3-7 tabulates the corresponding firm-ground UHS acceleration values.

**Table 3-4. Spectral Acceleration Values of UHS for Firm Ground at Site 1  
(5% Damping)**

Period (sec)	72-yr Return Period			475-yr Return Period		
	Horizontal Fault Normal	Horizontal Fault Parallel	Vertical	Horizontal Fault Normal	Horizontal Fault Parallel	Vertical
0.010	0.173	0.173	0.129	0.496	0.496	0.515
0.020	0.173	0.173	0.129	0.496	0.496	0.515
0.030	0.173	0.173	0.157	0.496	0.496	0.687
0.050	0.214	0.214	0.247	0.614	0.614	1.229
0.075	0.266	0.266	0.287	0.762	0.762	1.456
0.100	0.317	0.317	0.289	0.910	0.910	1.386
0.120	0.335	0.335	0.276	0.954	0.954	1.231
0.150	0.361	0.361	0.268	1.021	1.021	1.032
0.170	0.379	0.379	0.255	1.066	1.066	0.928
0.200	0.405	0.405	0.235	1.132	1.132	0.800
0.300	0.399	0.399	0.179	1.121	1.121	0.540
0.400	0.360	0.360	0.144	1.029	1.029	0.418
0.500	0.329	0.329	0.122	0.958	0.958	0.340
0.750	0.257	0.257	0.091	0.735	0.733	0.231
1.000	0.212	0.212	0.074	0.620	0.616	0.186
1.500	0.152	0.152	0.053	0.449	0.444	0.131
2.000	0.114	0.115	0.043	0.331	0.327	0.108
3.000	0.063	0.063	0.027	0.196	0.190	0.073
4.000	0.039	0.039	0.020	0.129	0.125	0.056
5.000	0.026	0.026	0.014	0.092	0.089	0.045
6.000	0.019	0.019	0.012	0.068	0.066	0.036
8.000	0.011	0.011	0.008	0.041	0.040	0.027
10.000	0.007	0.007	0.005	0.026	0.026	0.017

**Table 3-5. Spectral Acceleration and Relative Displacement Values for Firm-Ground UHS at Site 1 for OLE at Various Damping Levels**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)
0.01	0.173	0.000	0.173	0.000	0.173	0.000	0.173	0.000	0.173	0.000	0.173	0.000
0.03	0.186	0.002	0.181	0.002	0.173	0.002	0.165	0.001	0.156	0.001	0.154	0.001
0.10	0.430	0.04	0.385	0.04	0.317	0.03	0.264	0.03	0.211	0.02	0.195	0.02
0.20	0.590	0.23	0.514	0.20	0.405	0.16	0.322	0.13	0.244	0.10	0.222	0.09
0.30	0.582	0.51	0.507	0.45	0.399	0.35	0.318	0.28	0.241	0.21	0.219	0.19
0.40	0.524	0.82	0.456	0.71	0.360	0.56	0.286	0.45	0.217	0.34	0.197	0.31
0.50	0.479	1.17	0.417	1.02	0.329	0.81	0.262	0.64	0.198	0.49	0.180	0.44
0.75	0.375	2.06	0.326	1.80	0.257	1.42	0.205	1.13	0.155	0.85	0.141	0.78
1.00	0.305	2.98	0.267	2.61	0.212	2.07	0.170	1.66	0.130	1.27	0.118	1.16
1.50	0.215	4.72	0.189	4.17	0.152	3.36	0.124	2.73	0.096	2.12	0.088	1.95
2.00	0.158	6.18	0.140	5.50	0.115	4.49	0.094	3.69	0.074	2.91	0.069	2.69
3.00	0.084	7.40	0.076	6.67	0.063	5.58	0.053	4.69	0.043	3.81	0.040	3.54
4.00	0.050	7.90	0.046	7.20	0.039	6.14	0.034	5.27	0.028	4.37	0.026	4.10
5.00	0.032	7.91	0.030	7.29	0.026	6.32	0.023	5.52	0.019	4.67	0.018	4.42
6.00	0.024	8.48	0.022	7.81	0.019	6.78	0.017	5.91	0.014	5.01	0.013	4.74
8.00	0.014	9.05	0.013	8.34	0.012	7.23	0.010	6.31	0.009	5.35	0.008	5.05
10.00	0.009	9.05	0.009	8.34	0.007	7.23	0.006	6.31	0.005	5.35	0.005	5.05

**Table 3-6. Spectral Acceleration and Relative Displacement Values for Firm-Ground UHS at Site 1 for CLE at Various Damping Levels**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)	Acc. (g)	Disp. (in)
0.01	0.496	0.000	0.496	0.000	0.496	0.000	0.496	0.000	0.496	0.000	0.496	0.000
0.03	0.534	0.005	0.520	0.005	0.496	0.004	0.475	0.004	0.450	0.004	0.442	0.004
0.10	1.232	0.12	1.102	0.11	0.910	0.09	0.756	0.07	0.604	0.06	0.560	0.05
0.20	1.649	0.65	1.437	0.56	1.132	0.44	0.900	0.35	0.682	0.27	0.621	0.24
0.30	1.633	1.44	1.422	1.25	1.121	0.99	0.891	0.79	0.675	0.59	0.615	0.54
0.40	1.499	2.35	1.305	2.04	1.029	1.61	0.818	1.28	0.620	0.97	0.564	0.88
0.50	1.394	3.41	1.215	2.97	0.958	2.34	0.761	1.86	0.577	1.41	0.525	1.28
0.75	1.069	5.88	0.931	5.13	0.734	4.04	0.584	3.21	0.442	2.43	0.402	2.21
1.00	0.896	8.77	0.782	7.65	0.618	6.05	0.493	4.83	0.375	3.67	0.342	3.34
1.50	0.638	14.06	0.560	12.32	0.446	9.83	0.359	7.90	0.275	6.06	0.252	5.54
2.00	0.464	18.18	0.409	16.02	0.329	12.89	0.267	10.45	0.207	8.10	0.190	7.43
3.00	0.265	23.31	0.236	20.75	0.193	16.98	0.159	13.99	0.126	11.07	0.116	10.23
4.00	0.170	26.69	0.153	23.97	0.127	19.92	0.106	16.67	0.086	13.43	0.080	12.48
5.00	0.119	29.04	0.107	26.30	0.091	22.17	0.077	18.80	0.063	15.40	0.059	14.39
6.00	0.088	31.14	0.080	28.20	0.067	23.77	0.057	20.16	0.047	16.51	0.044	15.43
8.00	0.053	33.21	0.048	30.08	0.040	25.35	0.034	21.50	0.028	17.61	0.026	16.46
10.00	0.034	33.21	0.031	30.08	0.026	25.35	0.022	21.50	0.018	17.61	0.017	16.46

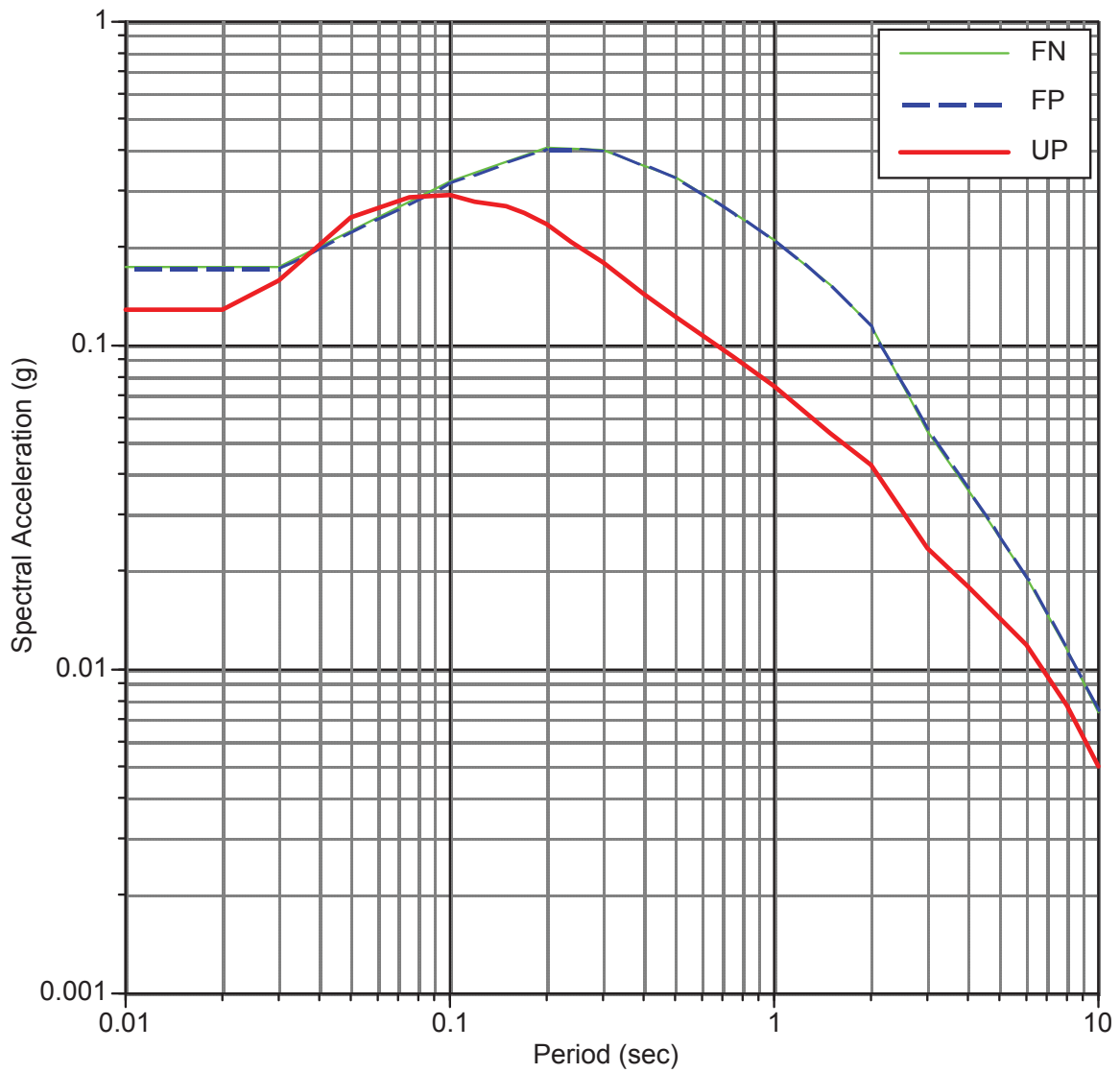


Figure 3-10. Firm-Ground Uniform Hazard Spectra for 72-yr Return Period (OLE)



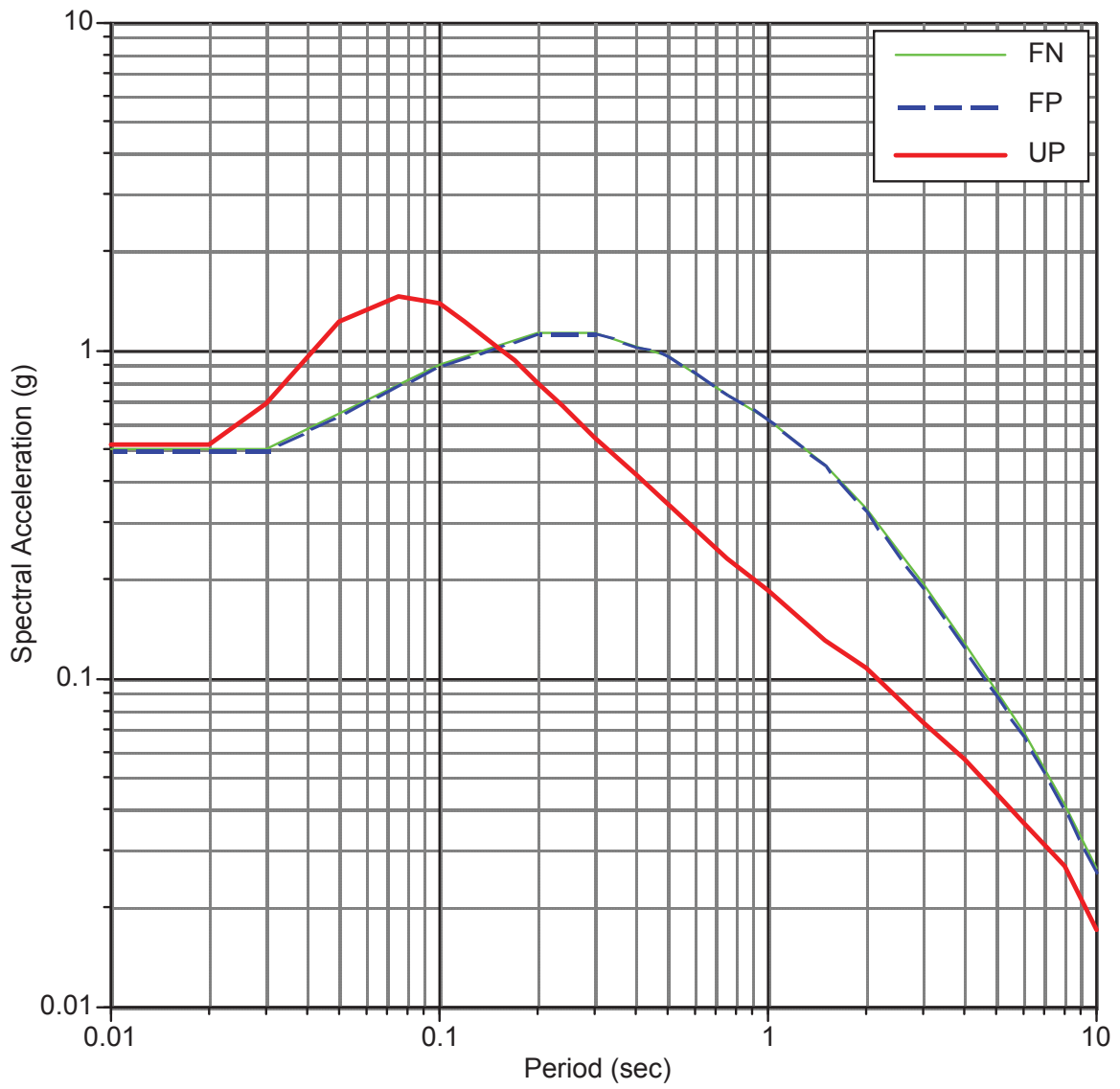


Figure 3-11. Firm-Ground Uniform Hazard Spectra for 475-yr Return Period (CLE)

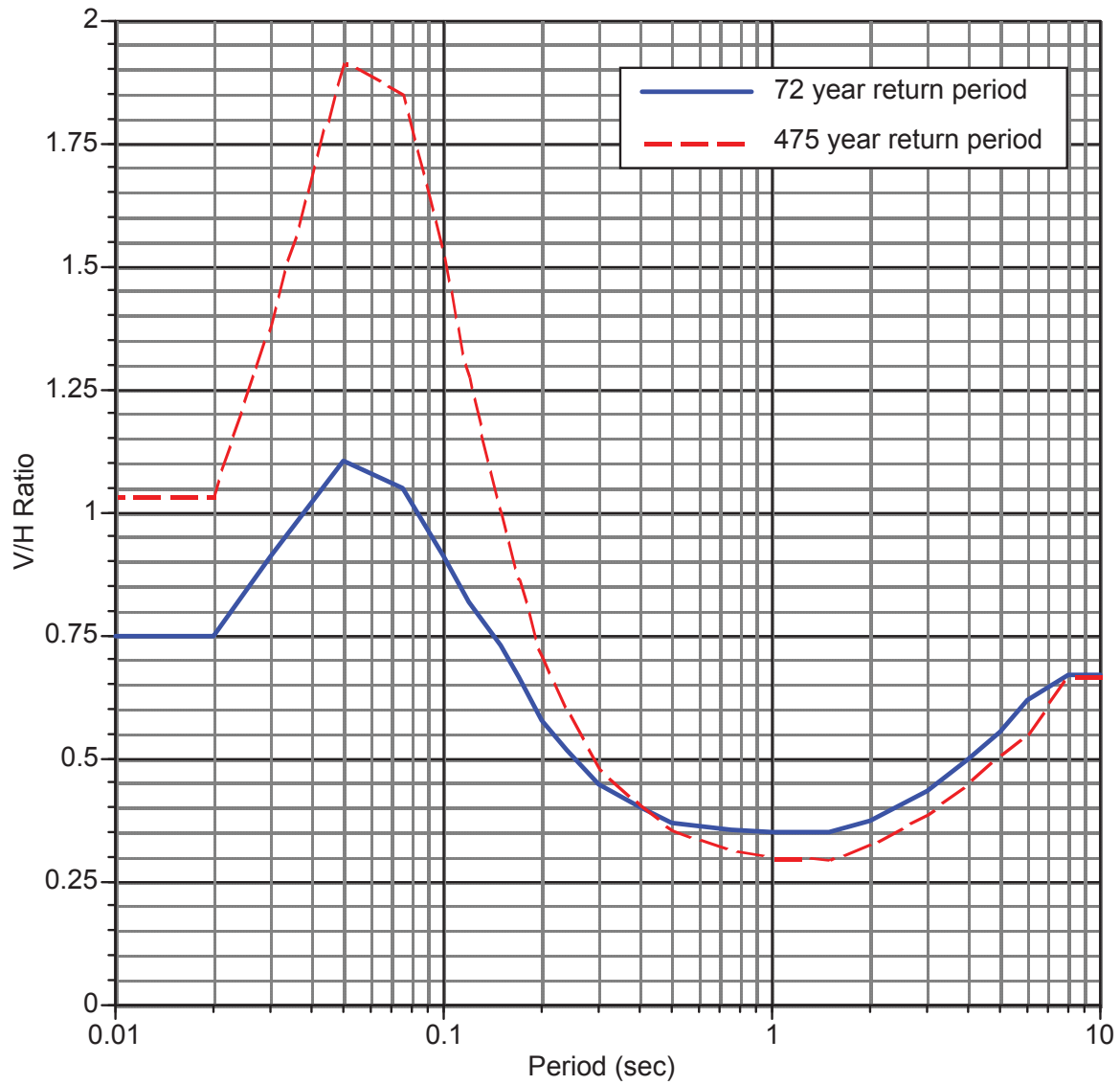
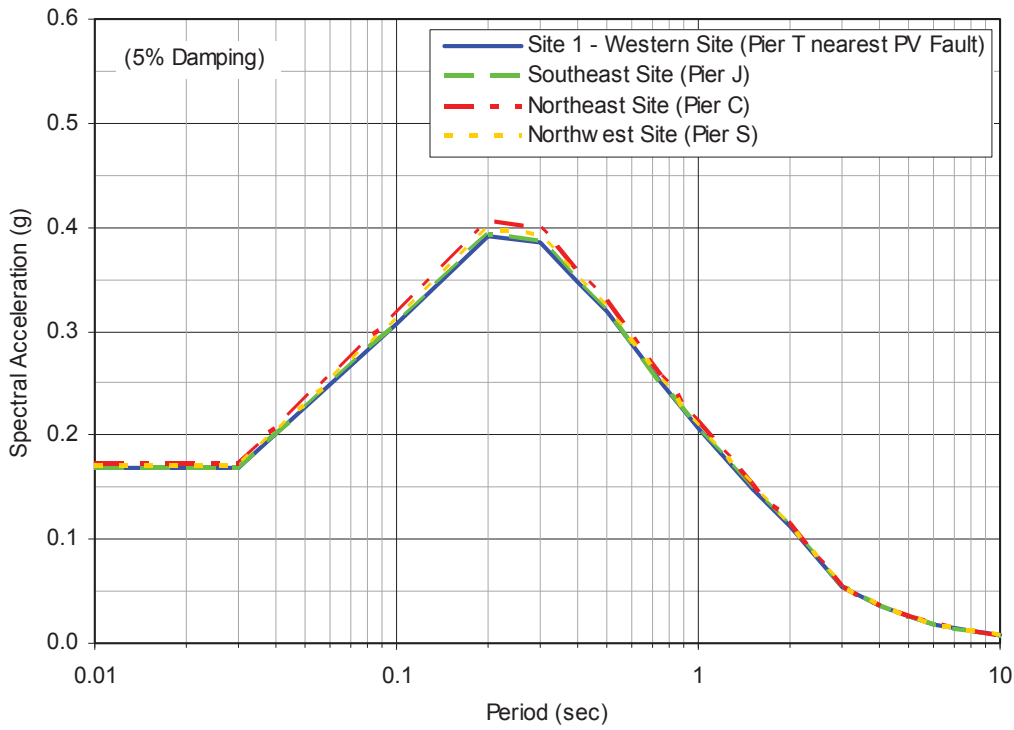
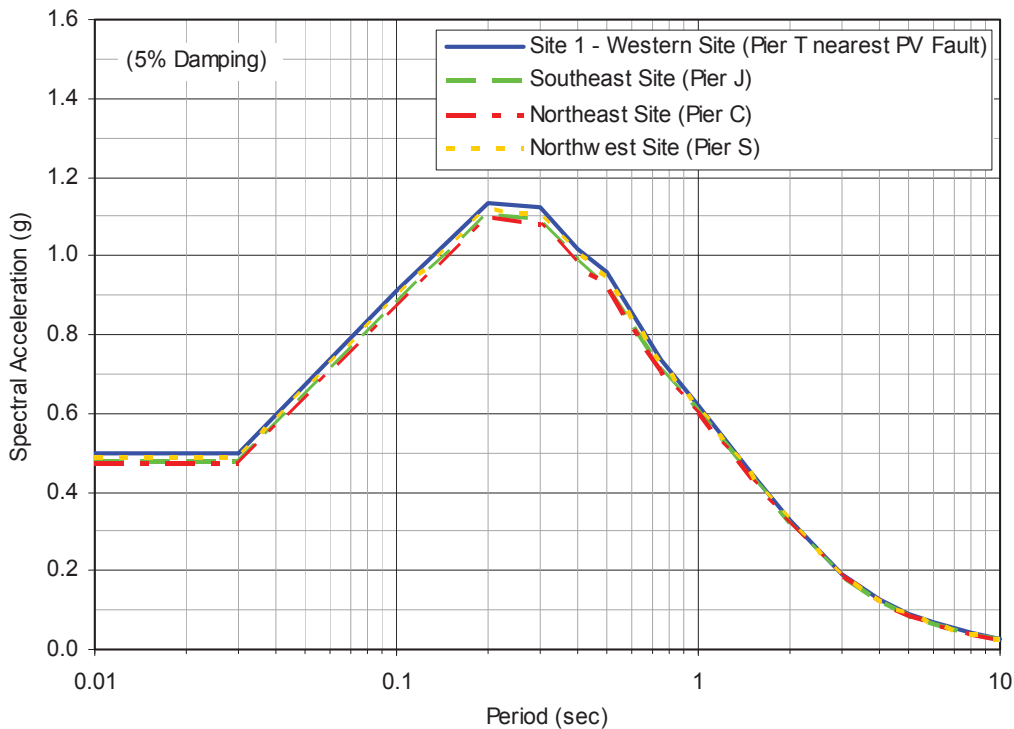


Figure 3-12. V/H Ratio Based on Controlling Source for 72-yr and 475-yr Return Periods



**Figure 3-13. Comparison of Firm-Ground UHS for 72-yr Return Period (OLE) at Four Sites**



**Figure 3-14. Comparison of Firm-Ground UHS for 475-yr Return Period (CLE) at Four Sites**

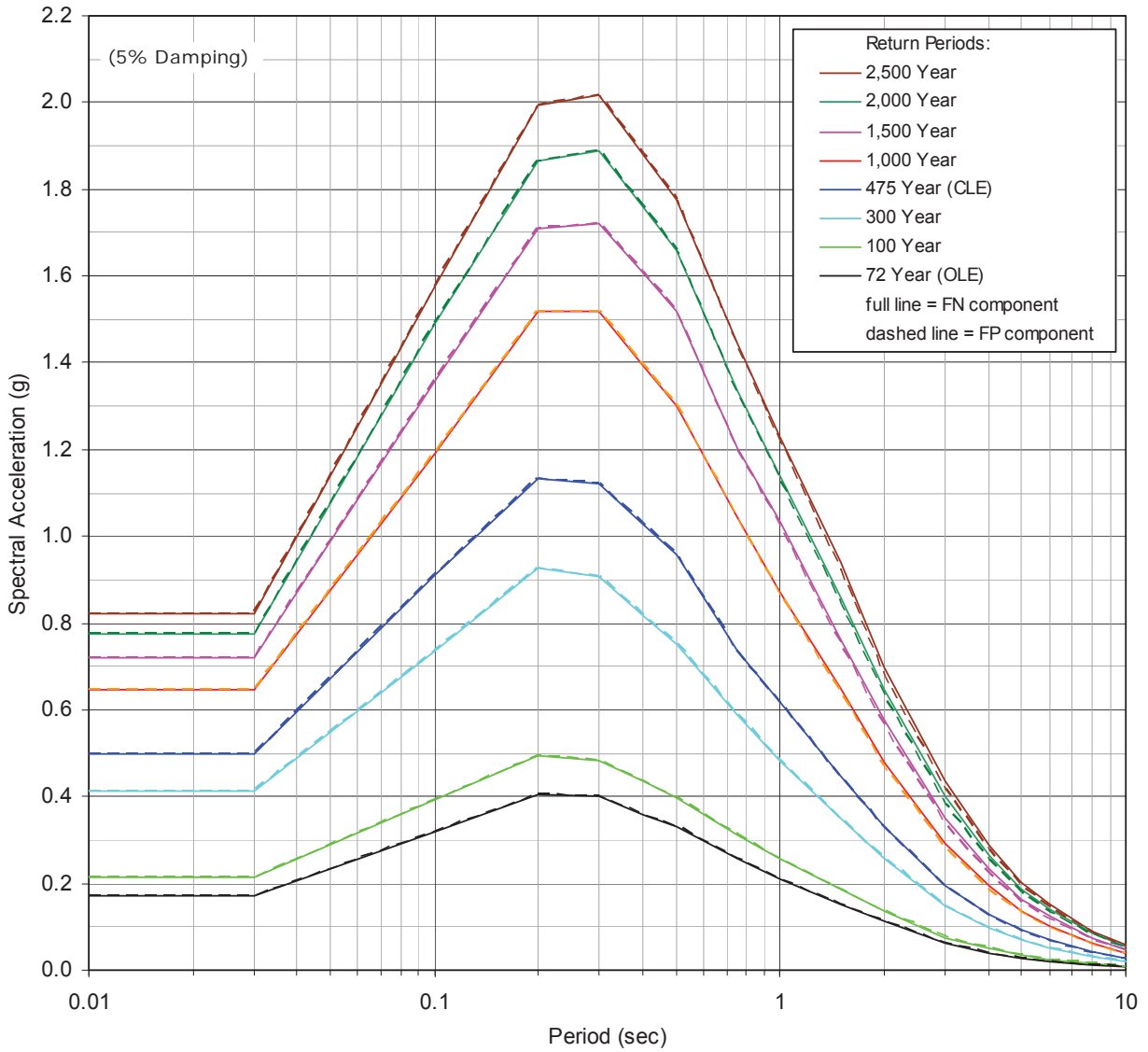


Figure 3-15. Comparison of Firm-Ground UHS for Various Return Periods

**Table 3-7. Spectral Acceleration Values of Firm Ground UHS for Various Return Periods (5% Damping)**

Period (sec)	Spectral Acceleration (g) for Return Period of							
	72 Years (OLE)		100 Years		300 Years		475 Years (CLE)	
	FN	FP	FN	FP	FN	FP	FN	FP
0.01	0.173	0.173	0.213	0.213	0.413	0.413	0.496	0.496
0.03	0.173	0.173	0.213	0.213	0.413	0.413	0.496	0.496
0.10	0.317	0.317	0.393	0.393	0.734	0.734	0.910	0.910
0.20	0.405	0.405	0.494	0.494	0.926	0.926	1.132	1.132
0.30	0.399	0.399	0.484	0.484	0.908	0.908	1.121	1.121
0.40	0.360	0.360	0.436	0.436	0.819	0.819	1.029	1.029
0.50	0.329	0.329	0.398	0.398	0.750	0.750	0.958	0.958
0.75	0.257	0.257	0.310	0.310	0.588	0.587	0.735	0.733
1.00	0.212	0.212	0.256	0.256	0.483	0.481	0.620	0.616
1.50	0.152	0.152	0.185	0.185	0.350	0.347	0.449	0.444
2.00	0.114	0.115	0.137	0.138	0.258	0.256	0.331	0.327
3.00	0.063	0.063	0.076	0.076	0.149	0.147	0.196	0.190
4.00	0.039	0.039	0.049	0.049	0.098	0.097	0.129	0.125
5.00	0.026	0.026	0.034	0.034	0.070	0.069	0.092	0.089
6.00	0.019	0.019	0.025	0.025	0.052	0.051	0.068	0.066
8.00	0.011	0.011	0.015	0.015	0.031	0.031	0.041	0.040
10.00	0.007	0.007	0.010	0.010	0.020	0.020	0.026	0.026
Period (sec)	Spectral Acceleration (g) for Return Period of							
	1,000 Years		1,500 Years		2,000 Years		2,500 Years	
	FN	FP	FN	FP	FN	FP	FN	FP
0.01	0.647	0.647	0.719	0.719	0.776	0.776	0.823	0.823
0.03	0.647	0.647	0.719	0.719	0.776	0.776	0.823	0.823
0.10	1.193	1.193	1.358	1.358	1.493	1.493	1.577	1.577
0.20	1.519	1.519	1.711	1.711	1.866	1.866	1.994	1.994
0.30	1.519	1.519	1.722	1.722	1.887	1.887	2.017	2.017
0.40	1.396	1.396	1.607	1.607	1.758	1.758	1.881	1.881
0.50	1.300	1.300	1.517	1.517	1.659	1.659	1.775	1.775
0.75	1.042	1.038	1.203	1.197	1.335	1.328	1.446	1.438
1.00	0.872	0.863	1.034	1.026	1.142	1.131	1.231	1.219
1.50	0.648	0.639	0.764	0.750	0.861	0.844	0.943	0.923
2.00	0.480	0.469	0.576	0.560	0.644	0.629	0.697	0.679
3.00	0.293	0.280	0.352	0.335	0.401	0.381	0.434	0.416
4.00	0.193	0.185	0.232	0.221	0.264	0.251	0.287	0.275
5.00	0.138	0.131	0.165	0.158	0.188	0.179	0.204	0.196
6.00	0.103	0.098	0.123	0.117	0.140	0.133	0.152	0.146
8.00	0.062	0.059	0.074	0.070	0.084	0.080	0.091	0.087
10.00	0.039	0.038	0.047	0.045	0.054	0.051	0.058	0.056

### 3.3.4 Spectrum-Compatible Time Histories for CLE

Based on the deaggregation, the controlling earthquake for the 475-yr return period is of magnitude 6.5 to 7.5 occurring at a distance of 0 to 5 km with forward directivity.

The PEER NGA data set (version 5), consisting of over 3,500 recordings, was searched for ground motions from magnitudes 6.5 to 7.5 and stations with distances of 0 to 10 km, resulting in 68 candidate recordings. From this subset, the spectral shape of the empirical ground motion was compared to the spectral shape of the firm-ground UHS for the CLE for the average horizontal component. The 7 sets of candidate time histories which were used in the spectral matching procedure were selected from the resulting 68 records based on the similarity between the recorded spectral shape and the target spectral shape, forward directivity recording, and selection of several earthquakes. The seven selected sets of time histories are listed in Table 3-8. For each recording, the directivity parameter  $x \cdot \cos \theta$  is given. This parameter is defined between values of 0 and 1, with larger values indicating a forward directivity case.

These ground motions were modified to match the UHS using the program RSPMATCH which uses the time-domain approach. The goal of this approach is to preserve the general non-stationary character of the ground motion in acceleration, velocity, and displacement while modifying the spectral response to match a given target response spectrum.

The initial 3-component time histories, modified time histories, and comparison of the matched spectra with the firm-ground UHS for the CLE are shown in Appendices D.1.

### 3.3.5 Spectrum-Compatible Time Histories for OLE

Based on the deaggregations, the controlling earthquake for the 72-yr return period is of Magnitude 6.0 to 7.0 occurring at about 20 km distance with neutral directivity. The startup time history records used for the OLE spectrum-compatible motions as well as firm-ground and design motions are discussed in Section 5.3.1.5.

**Table 3-8. Time Histories Selected for CLE Spectral Matching**

Set	Earthquake	Magnitude	Station	Distance (km)	Directivity Parameter $x \cdot \cos \theta$
1	1999 Hector Mine	7.1	Hector	12	0.57
2	1989 Loma Prieta	6.9	Gilroy 03	13	0.45
3	1979 Imperial Valley	6.5	Brawley	10	0.75
4	1999 Duzce	7.1	Lamont 1059	4	0.36
5	1992 Erzikan	6.7	Erzikan	4	0.31
6	1940 Imperial Valley	7.0	El Centro	6	0.14
7	1995 Kobe	6.9	Kobe University	1	0.42

## SECTION 4 EARTHQUAKE SITE RESPONSE

### 4.1 METHODOLOGY

Incorporation of earthquake site response was based on one-dimensional response theory with adjustments applied to address modeling and physical issues. One-dimensional response calculations were undertaken using the computer program SHAKE91 (Idriss and Sun, 1992), a proven and widely used numerical analysis method. However, the program assumes horizontally layered soil deposits subjected to vertically propagating shear wave and only recognizes nonlinear stress-strain behavior of soil in the form of shear-strain-dependent equivalent-linear shear modulus and damping values.

### 4.2 RESULTS

Site response analyses were conducted using SHAKE91 for the four representative soil columns for Zones I, II, III and IV shown in Figure 2-7. The effect of site response modification is expressed in terms of a period-dependent transfer function defined by the ratio of the resultant ground surface spectral amplitude to the firm-ground spectral amplitude for each period. For each soil column, site response analyses were conducted for a best-estimate shear wave velocity profile as well as for a stiffer and a softer shear wave velocity profile to account for basic uncertainties in site soil properties. For each of the three shear wave velocity models, site response analyses were conducted using 6 horizontal component input motions for each of the OLE and the CLE ground shaking levels. This resulted in 18 site response solutions for each of the 4 soil columns for the OLE and CLE. The 18 solutions were then averaged to develop the site response transfer function for each soil profile as shown in Figure 4-1 and Figure 4-2 for OLE and CLE, respectively.

It can be observed from both figures that the shapes of transfer functions for Zones II, III and IV are similar in the entire period range. For these three zones, the transfer functions for OLE in Figure 4-1 are less than 1 at periods below 0.5 sec and greater than 1 at higher periods. The transfer function for the CLE in Figure 4-2 is less than 1 at periods below 0.2 sec, and greater than 1 at higher periods for the three zones. In contrast, Zone I reflects the stiffest shear wave velocity profile analyzed (see Figure 2-7) and the transfer functions for OLE and CLE are closer to 1 throughout the entire period range than for the other three zones. At the fundamental site response period for the four soil profiles (periods above 0.5 sec), the transfer function of Zones III has the highest values compared to the other zones for both OLE and CLE. For periods below 0.5 sec, the transfer function of Zone I has the highest values for both OLE and CLE.

The OLE and CLE firm-ground spectra for Site 1 representative for the port-wide UHS were shown in Figure 3-10 and Figure 3-11, respectively. The spectral ordinates of these spectra were listed in Table 3-5 and Table 3-6, respectively. As a result of the above observations, the transfer functions for Zones I and III were applied to the OLE and CLE port-wide firm-ground UHS (respectively) by direct scaling to conservatively account for site-response effects port-wide.

For the OLE, all four site effect-adjusted UHS and the firm-ground UHS were then enveloped to obtain the resultant port-wide theoretical site effect-adjusted UHS shown in Figure 4-3. The spectral values are given in Table 4-1.

For the CLE, a similar approach but with additional adjustments was used. Experienced geotechnical engineers have long recognized that there are some inherent problems in the site response analysis procedure using SHAKE91. Generally, the equivalent-linear site response analysis procedure tends to overdamp the ground motion at short-period range and over-exaggerate the site response effect at the fundamental frequency of the soil column. Also, it is common knowledge that the equivalent-linear site response method yields more reasonable site response solutions at lower ground shaking levels (with PGA below 0.3g range), whereas at higher levels, the equivalent-linear site response solutions begin to break down due to stronger nonlinear stress-strain behavior of the soil. As a result, the site effect-adjusted spectra for the CLE were modified to compensate for these limitations in the equivalent-linear site response analysis. The port-wide theoretical site effect-adjusted spectrum was obtained by enveloping the four site effect-adjusted and the firm-ground spectra at the short-period range up to 0.5 sec and by softening the site effect-adjusted UHS over the 0.5 to 2.0-sec period range. The resulting port-wide theoretical site effect-adjusted spectrum is shown in Figure 4-4 and the spectral values are given in Table 4-1. The difference between this spectrum and the firm-ground spectrum is consistent with the site soil adjustment factors recommended by NEHRP (Table 3.3-2 in FEMA, 2003) for spectral accelerations at 1 sec period.

**Table 4-1. Spectral Values for Theoretical Site-Effect Adjusted UHS (5% Damping)**

Period (sec)	Average Horizontal Spectral Acceleration (g)	
	OLE (see Figure 4-3)	CLE (see Figure 4-4)
0.01	0.173	0.497
0.03	0.173	0.497
0.10	0.317	0.910
0.20	0.405	1.138
0.30	0.400	1.210
0.40	0.382	1.133
0.50	0.365	1.028
0.75	0.320	0.840
1.00	0.268	0.717
1.50	0.174	0.515
2.00	0.122	0.362
3.00	0.065	0.199
4.00	0.040	0.128
5.00	0.026	0.091
6.00	0.020	0.068
8.00	0.012	0.041
10.00	0.008	0.026



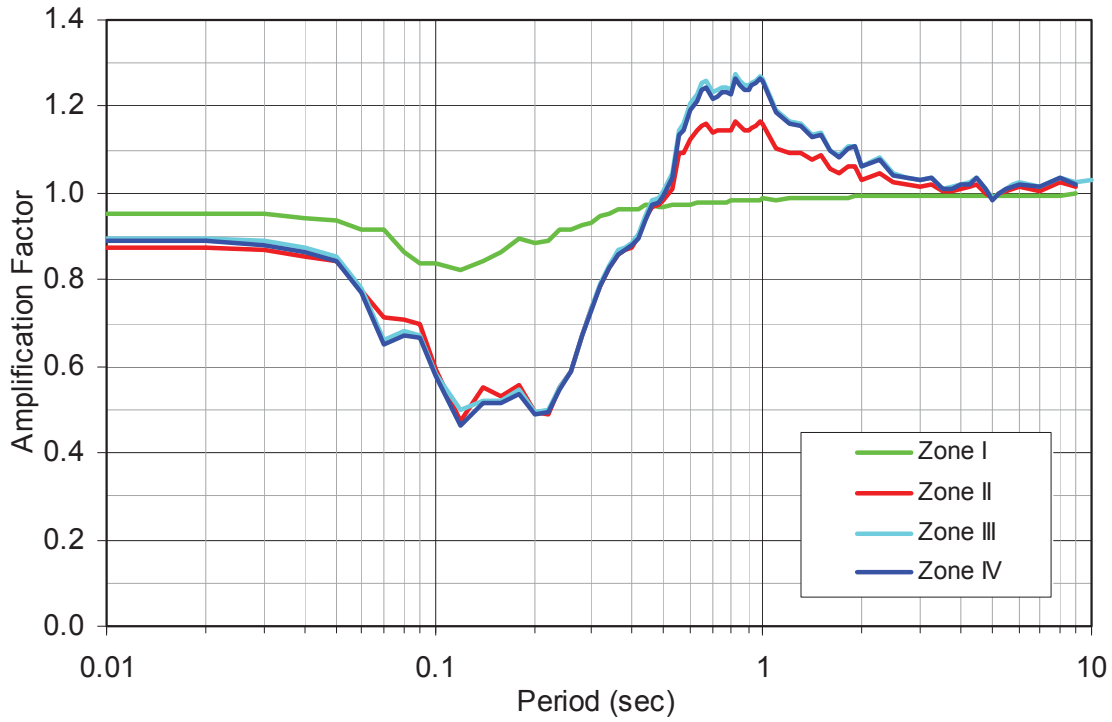


Figure 4-1. Transfer Functions for 72-yr Return Period (OLE)

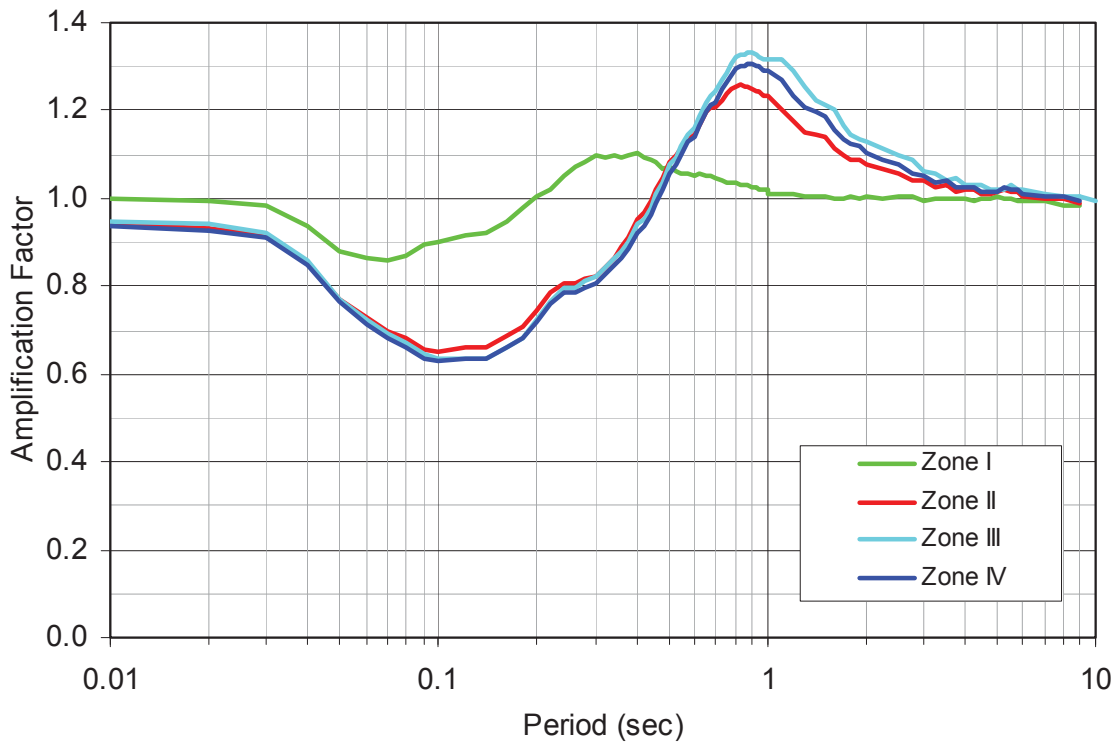


Figure 4-2. Transfer Functions for 475-yr Return Period (CLE)

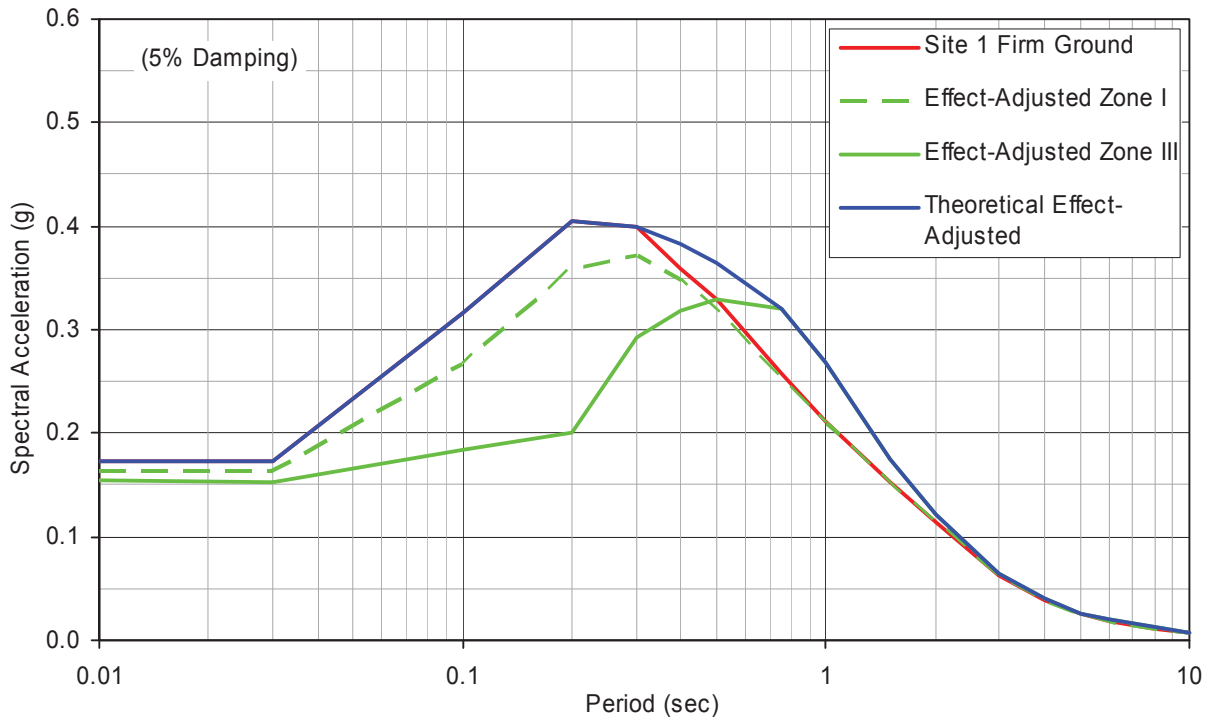


Figure 4-3. Theoretical Site Effects for OLE

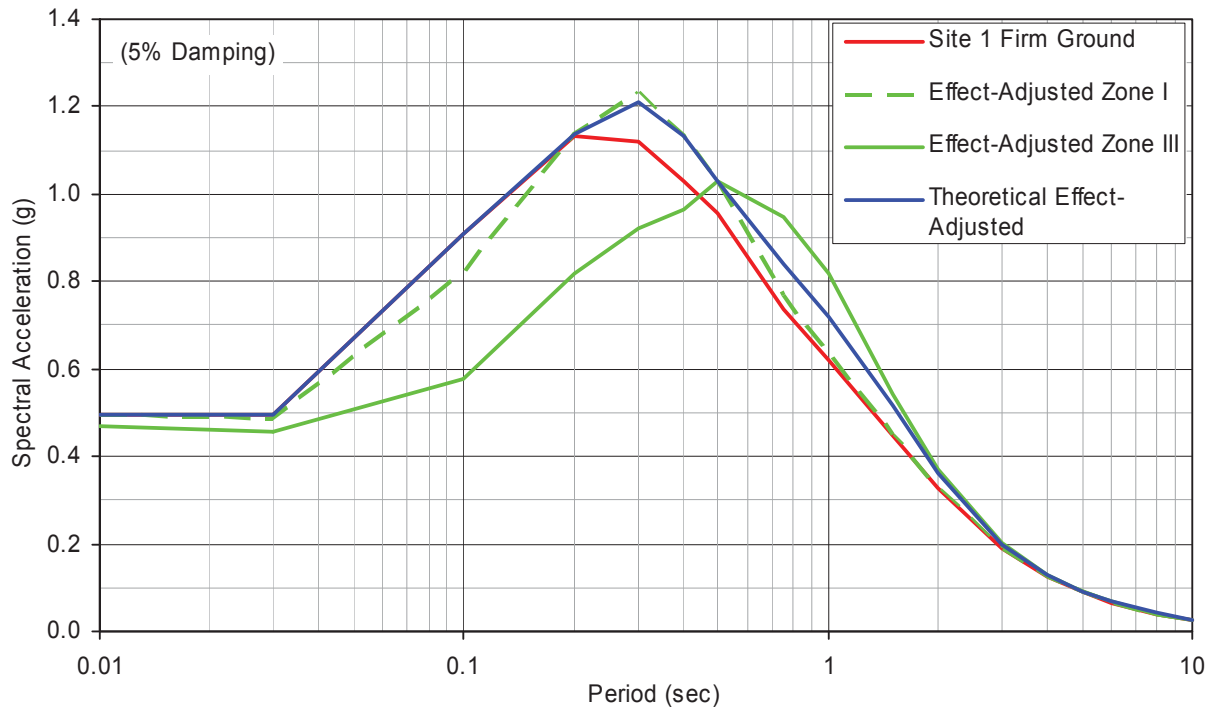


Figure 4-4. Theoretical Site Effects for CLE

## **SECTION 5 SUMMARY, CONCLUSIONS, AND DESIGN RECOMMENDATIONS**

### **5.1 OVERVIEW**

The Port's past practice toward the development of ground motion criteria for design has been to conduct site-specific studies for each project by the design teams selected for these projects. This approach has the benefit of site-specific data being utilized for each project. However, over the years, there have often been significant discrepancies among various recommendations among various consultants.

EMI's scope of work includes conducting a port-wide ground motion study to resolve some of the inherent issues contributing to inconsistent design criteria experienced among past POLB projects and to develop a consistent set of ground motion recommendations that can be used on future container wharf projects and other types of structures. The scope of work included:

- Assemble an expert advisory panel representing the academic community and practicing professionals to review past ground motion studies sponsored by the POLB, and to determine reasons contributing to discrepancies in prior studies.
- Together with the expert panel, review developments in the seismological, geological and geotechnical communities to select the most up-to-date and appropriate basis for conducting a ground motion study for the POLB.
- Using the most appropriate models and technical approaches, conduct sensitivity studies to clarify the key parameters affecting ground motion design criteria for the POLB structures.
- Propose appropriate ground motion design criteria to be used for future design of conventional container wharves and other types of structures within the POLB.
- Identify potential future developments that would require updates of the ground motion recommendations developed in this study.

### **5.2 MAJOR FINDINGS**

As the first task in our scope of work, we compiled OLE (72-year return period) and CLE (475-year return period) design response spectra recommended in several past consultants' reports to the POLB in order to appreciate the range of variations in the recommended spectra.

Figure 5-1 and Figure 5-2 summarizes the comparisons for OLE and CLE spectra from the various POLB ground motion criteria studies, respectively. It can be observed that there is a wide range of variation in the recommended design spectra proposed to the POLB. For the OLE, the ratio of highest to lowest shaking values were on the order of 2.1 at 0.5 sec, 2.4 at 0.7 sec, 2.5 at 1 sec, and over 2.0 at periods longer than 2 sec. For the CLE, the highest versus the lowest shaking values were observed to be approximately 1.3 at 0.5 sec, 1.4 at 0.7 sec, 1.6 at 1 sec, and 1.8 at periods longer than 2 sec. The reasons for the large variation cannot be easily explained, especially from the structural designer's point of view. The following are possible reasons for the observed variations:

- Differences in the modeling approach for the seismic sources.
- Differences in the assumed recurrence relationships. This issue could contribute to significant variations in the various recommended OLE spectra (see Section 5.3.1).
- Differences in treatment of attenuation relationships, especially for long-period motion adjustments to account for near-fault directivity effects. We believe that this issue may account for the observed variation of the CLE spectra, especially at longer-period range above 2 sec.
- Differences in the approach to resolve site response issues also contributed to significant variations in the recommended design spectra.

We also reviewed the ground motion recommendations provided to the POLB from other consultants, and conducted a number of sensitivity studies. The results and findings summarized below speculate on some of the reasons for the wide range of recommendations among different consultants and provide some key conclusions on which our recommendations to the POLB were based:

- The Palos Verdes fault dominates the ground motion at various locations at the POLB, especially for the CLE scenario. The Newport Inglewood fault also contributes to the ground motion shaking hazard at POLB to some minor extent. Other more distant faults can generally be ignored for ground shaking issues associated with the CLE event.
- Variation in expected shaking levels due to differing distances among POLB locations to the Palos Verdes fault is small (less than 12% for the CLE and less than 4% for the OLE). This would justify adopting one set of port-wide design spectra for all future port projects.
- As discussed in Section 4, unlike other ports, such as the Port of Oakland or the Port of Los Angeles (POLA), anomalous soil conditions such as underconsolidated to normally consolidated soft clay sites that are the cause for extremely large site amplification effects do not seem prevalent in the predominately alluvial deposit geologic environment at the POLB. Based on our findings from the site response analyses, it would be easy to exaggerate site amplification effects due to defining input motions at large depths, or by creating artificial impedance contrasts in the site response model such as at the transmitting boundary for the SHAKE91 profile. From our experience, if a site response

analysis is properly conducted, site amplification effects tend to be no higher than about 35% for alluvial sites such as those present at the POLB. Undoubtedly, there are other issues such as basin effects or topography effect of the slope configuration which can contribute to arguments for changes to the ground motion design criteria. However, we believe that much of these variations have been implicitly accounted for in a probabilistic seismic hazard solution by the large standard deviation used in the attenuation relationship. Also, from what we have observed as presented by comparisons of past consultant recommendations on ground motion criteria to the POLB, there is a great danger for projecting unsubstantiated variations in the design criteria which largely led to delays and inconsistencies in the resulting design.

We believe that there is significant merit in adopting the ground motion criteria for port-wide design applications provided in Section 5.3. However, it should be recognized that this report is a living document that needs to be updated periodically to incorporate future advances in the seismological, geological, and geotechnical communities. Section 7 discusses some potential developments that could trigger the need for such updates.

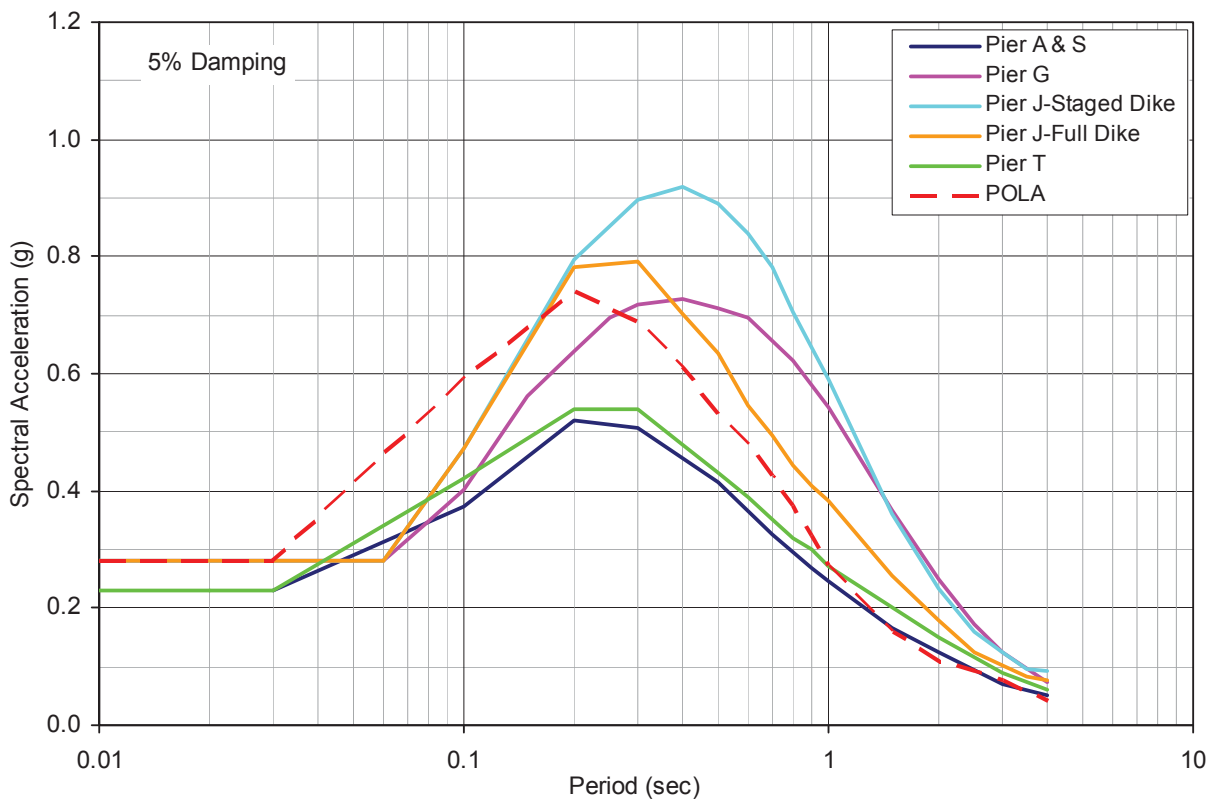


Figure 5-1. Comparison of OLE Spectra from Past Projects

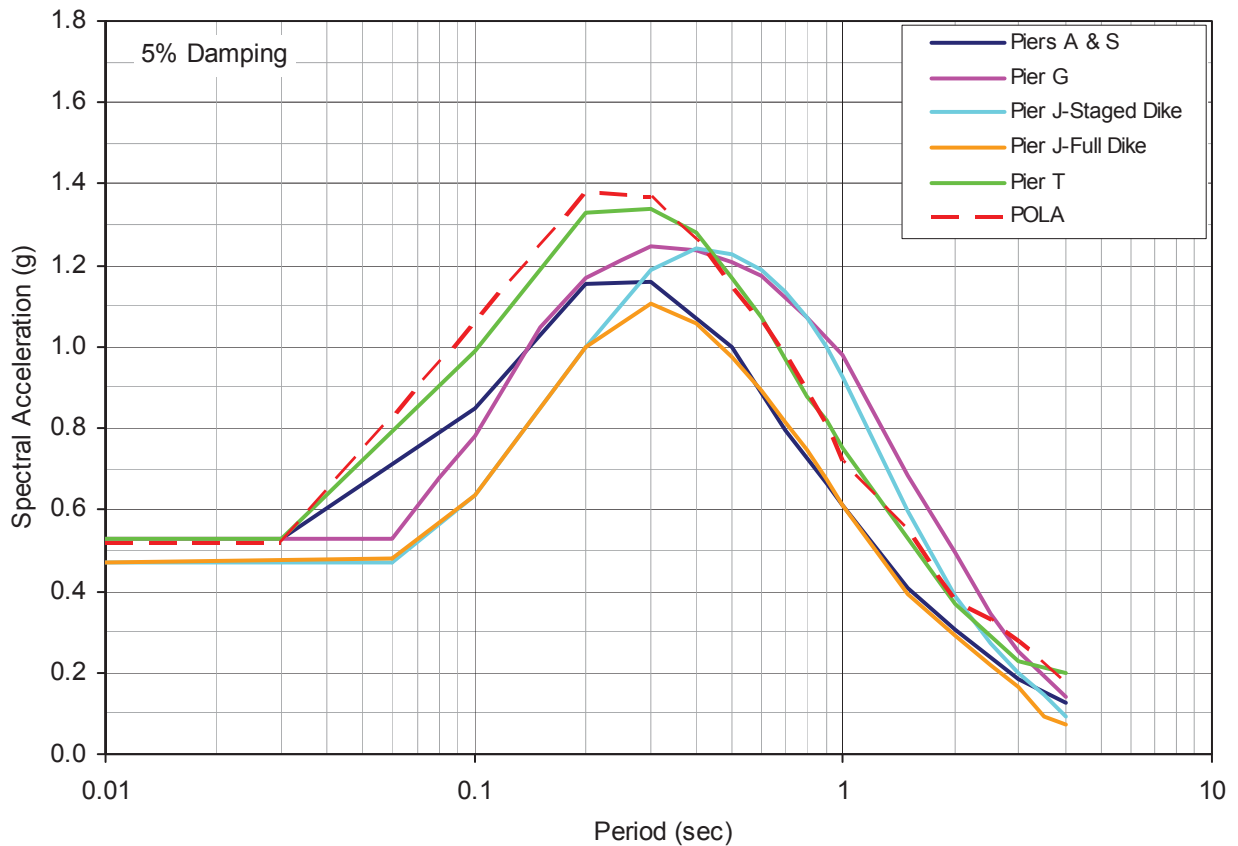


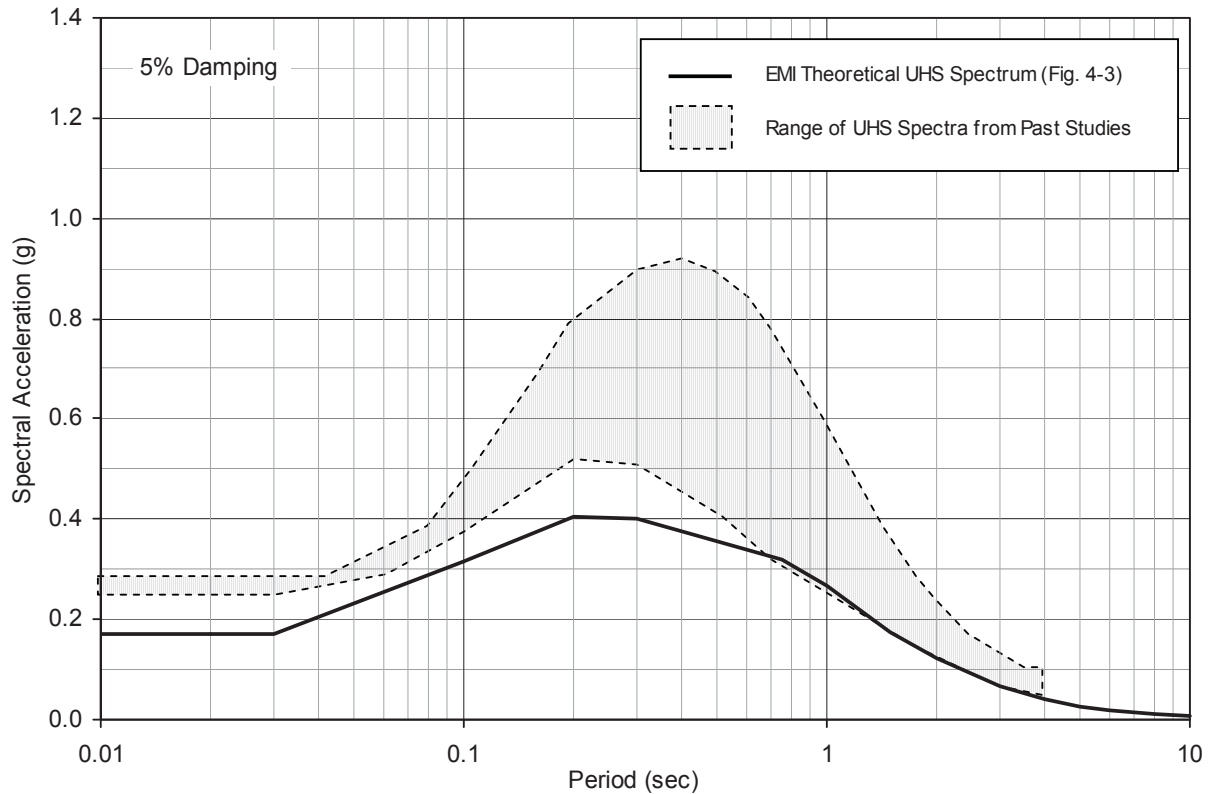
Figure 5-2. Comparison of CLE Spectra from Past Projects

### 5.3 GROUND MOTION RECOMMENDATIONS

#### 5.3.1 OLE Spectra Recommendations

##### 5.3.1.1 General

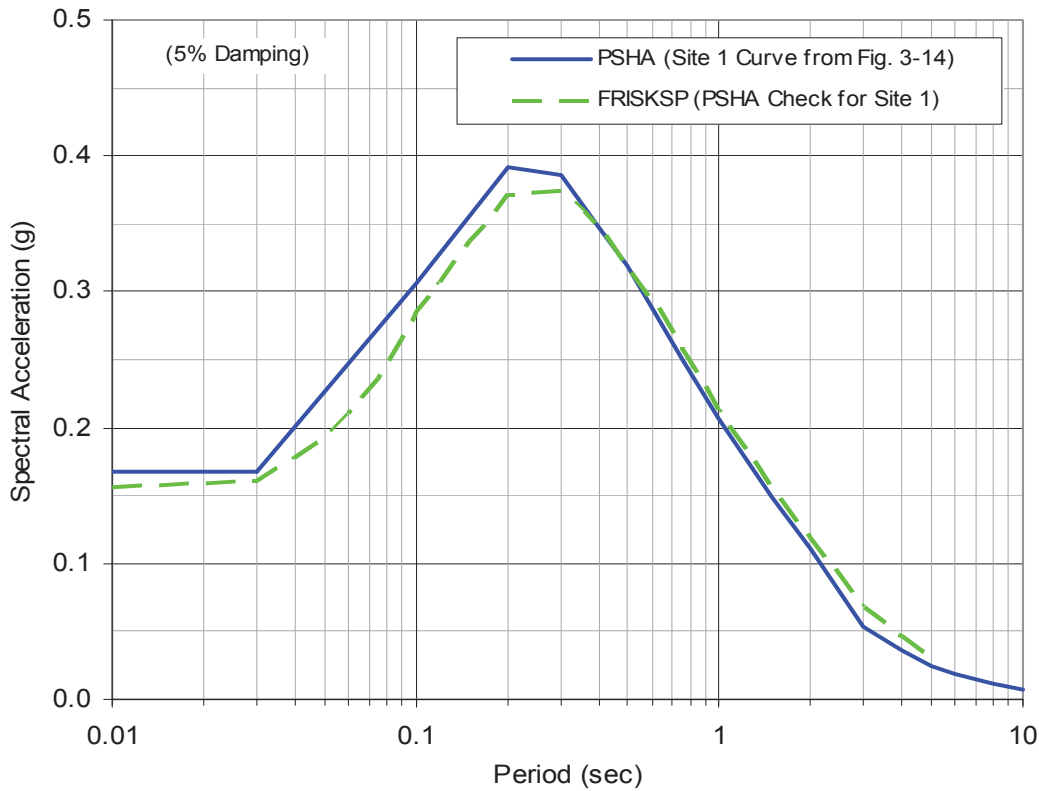
The port-wide theoretical site effect-adjusted UHS for OLE (72-yr return period) developed in Section 4.2 (see Figure 4-3 and Table 4-1) is compared in Figure 5-3 with a range of OLE design spectra recommended for past projects by other consultants. It can be seen that the OLE spectrum from this current study is below or near the lower bound of the range of prior spectra in the entire period range. The following sections provide justification for the development of the OLE spectrum recommended for design of future structures.



**Figure 5-3. Comparison of Theoretical Design UHS for 72-yr Return Period for OLE with Past OLE Spectra**

### 5.3.1.2 Independent Check

EMI performed a probabilistic seismic hazard analysis (PSHA) as an independent check of the validity of Dr. Abrahamson’s probabilistic hazard analyses and studies to clarify the cause of the observed differences in solutions. The check was performed for Site 1 for the OLE using the computer program FRISKSP 4.00 (Blake, 2000). This program first solves for the annual probability of exceeding a ground motion level for each earthquake source. The built-in standard California Geological Survey fault model with the characteristic earthquake recurrence relationship and a model without the characteristic relationship were used. The probability values for each fault are then integrated to obtain the total probability of exceedance curve. Three different firm-ground attenuation relationships were used to ascertain a possible spread of the probability analysis results: (1) Abrahamson and Silva (1997), (2) Campbell (1997), and (3) Sadigh et al. (1997). The log-average of the three results was then computed to obtain the final curve shown in Figure 5-4. From this figure, it can be seen that the resulting UHS for OLE using FRISKSP and the characteristic relationship compares well with the UHS for Site 1 from PSHA analysis presented in Figure 3-13.



**Figure 5-4. Comparison of UHS for 72-Yr Return Period from PSHA and FRISKSP (Firm-Ground Site Attenuation Solutions)**

### 5.3.1.3 Comparison of Gutenberg-Richter and Characteristic Earthquake Recurrence Relationships

A careful review of this current PSHA model as compared to the prior PSHA model by EMI (2001) adopted by POLA showed that the primary cause for the difference in the OLE spectra is due to differences in the recurrence relationship. In this study, the characteristic model was adopted whereas the Gutenberg and Richter truncated exponential recurrence model was used for the EMI's PSHA (2001). The following discussion is presented to clarify this aspect.

Gutenberg and Richter (1954) noted that earthquake magnitude and frequency appeared to have a systematic exponential relationship whereby earthquakes of one magnitude unit were about ten times as frequent as those of a larger magnitude unit. This was expressed as the equation

$$\log_{10} N = a - bM \quad (5.1)$$

where

N = annual rate of the number of earthquakes of a given magnitude M or greater,  
a = constant representing the level of seismic activity, and  
b = ratio of small to larger events.



In seismic hazard analyses where the relationship is truncated at some maximum magnitude, the semi-log plot of linear  $\log_{10} N$  versus magnitude is referred as the “truncated exponential” model. When earthquakes are evaluated on a large regional basis, the  $b$  value turns out to be close to about 1.0. Historically, seismologists such as Gutenberg and Richter (hereafter referred to as “GR”) made use of recorded activities of smaller earthquakes (say in the  $M = 3$  to 5 range) to anchor the recurrence relationship (such as the truncated exponential model) and then extrapolated the curve to the larger-magnitude, less frequent earthquakes. Such a practice was nearly universal for seismic hazard analyses conducted for older studies (in the 1970’s).

However, toward the late 1980s, geologists such as Schwartz and Coppersmith (1984) observed that this practice of extrapolating activity rates of smaller earthquakes tends to underpredict larger earthquakes along major prominent active faults. Figure 5-5 shows a graph from Schwartz and Coppersmith (1984) that illustrates this issue. They pointed out that geologic processes are often long-term processes, much longer than the 50 years or so of instrumental seismicity data experience. Hence, it might be more valid to base the recurrence rate of the larger magnitude earthquakes on prominent faults using geologic information (including trenching studies and historical accounts of past large earthquakes) which reflects experience from a much longer duration of geologic history and therefore be more representative (especially to account for the more destructive larger magnitude earthquakes) of design interest for a life-safety design goal.

Geologic evaluation of faults by Schwartz and Coppersmith (1984) suggested that some faults showed repeated displacement amounts indicating recurring large magnitude events, but few if any smaller displacements as would be expected if smaller earthquakes occurred. From this, they concluded that individual faults have a tendency to produce repeated larger earthquakes within a specific or narrow range, i.e. a characteristic size. Probabilistic seismic hazard analyses in the past decade or so have increasingly favored the characteristic model over the GR model. The characteristic earthquake model has become more accepted in developing recurrence relationships for major faults based on balancing long-term release of seismic energy (seismic moment) in terms of the observed long-term accumulation of seismic moment due to the slip-rate on the fault. Also, it has become more popular to assume that most of the accumulated energy (about 90%) is released by large-magnitude characteristic earthquakes. Such characteristic earthquake models lead to the more complex type of recurrence relationship as depicted by Schwartz and Coppersmith.

Previous probabilistic seismic hazard analyses performed by EMI in early 1990’s for the POLA to characterize the Palos Verdes fault utilized the GR relationship truncated at magnitude 7 (EMI, 1993). Figure 5-6 presents the EMI’s 1993 recurrence relationship for the Port of Los Angeles and compares it to the four characteristic-earthquake-model recurrence curves adopted for this current port-wide seismic hazard model. The four recurrence relationships are the Maximum, Median, Mean, and Minimum characteristic curves. These four relationships have been implemented in the current PSHA solution using a logic-tree approach that considers multiple hypotheses. It can be noted that both the GR and the Mean/Median characteristic curves approximate similar large-magnitude events ( $M 7$ ) at recurrence intervals of about 1,000 years. The similarity of the large-magnitude recurrence results in similar CLE design events regardless of which recurrence model is used. However, when the smaller earthquakes are considered, the

GR relationship suggests that an M 5 earthquake could be expected approximately every 20 years whereas the characteristic relationship for the Median/Mean curve indicates an M 5 event every 100 to 120 years. Because the OLE design event is controlled by the smaller events that recur within the shorter time period, design values will be substantially lower when using the characteristic relationship rather than the GR relationship.

These differences between the GR and characteristic magnitude-frequency relationships are the principal reason the CLE values of the previous analyses are similar to the present recommendation while the previous OLE values are considerably larger.

#### **5.3.1.4 Recommended Spectra for OLE**

Horizontal Design Spectrum. Figure 5-3 compares the port-wide theoretical site effect-adjusted UHS for OLE (72-yr return period) developed in Section 4.2 with the range of OLE design spectra recommended for past projects by other consultants. It can be seen that the OLE spectrum from this current study is below or near the lower bound of the range of prior spectra in the entire period range.

For the period range significant for wharf design (approximately 0.5 to 1.0 sec), the present theoretical UHS spectral value at 0.5 sec is about 10% below the lower bound of the range of the other past spectra, and is about the same as the lower bound at about 1.0 sec period. The reason for the differences was discussed in Section 5.3.1.3. The present study uses the most up-to-date geologic and seismic understanding, but updates will be needed when changes in this knowledge occur in the future. As a result, future changes in spectral values cannot be ruled out. From a practical standpoint, it is therefore prudent to incorporate some conservatism in the port-wide design spectrum to allow for possible future increases in spectral values. To address this issue, and following discussion with the Port, the design spectrum was obtained by increasing the spectral values of the theoretical site effect-adjusted spectrum by 20% in the short-period range (from 0 to 0.5 sec), by 10% at 0.75 sec and using the theoretical spectrum for the periods of 1.0 sec or larger. Minor adjustments to smooth acceleration and relative displacement spectra were then applied. The recommended PGA value for geotechnical evaluations is 0.21g (the corresponding dominant source is recommended as an M 6.5 earthquake at a distance of 20 km).

The resultant acceleration and pseudo relative displacement spectra (for 5% damping) recommended for port-wide design of structures are given in Figure 5-7 and Figure 5-8 respectively. Spectral values for a range of damping values are given in Table 5-2.

Horizontal Firm-Ground Spectrum. The firm-ground target spectrum compatible with the design spectrum at the ground surface was generated by dividing the recommended design spectra of Figure 5-7 by the transfer function between firm-ground and ground surface motions. The transfer function was obtained by ratio of the theoretical site-effect adjusted spectra and the firm-ground horizontal UHS shown in Figure 4-3. Appendix D.2 provides details of the methodology, and includes the resulting target firm-ground spectrum.

Vertical Firm-Ground and Design Spectrum. The firm-ground vertical spectrum was derived from the firm-ground spectrum (Figure 3-10) and the V/H ratios (Figure 3-12). The

recommended spectrum is shown in Figure 5-9. This spectrum may be used for both firm-ground conditions and design.

### 5.3.1.5 Spectrum-Compatible Time Histories

Compatible to Design Spectra. Seven (7) sets of startup firm-ground time histories (see Table 5-1) were selected for an Operating-Level Earthquake reflecting earthquakes ranging from Magnitude 6 to 7 with distances extending from near-fault to moderate distance events. These 3-component time histories were modified to be spectrum-compatible to the design response spectra of Figure 5-7 and Figure 5-9 adjusted for the site-specific soil conditions for the OLE.

The spectrum-matched three-component acceleration, velocity and displacement time histories, and comparisons of the corresponding spectra with the target design spectrum are provided in Appendix D.4.

Compatible to Firm-Ground Spectra. The startup time histories shown in Table 5-1 were modified to match the horizontal firm-ground target design spectrum adjusted for the site-specific soil conditions as described above. Appendix D.2 provides further details on the selection of records and the methodology of analysis.

Appendix D.2 also provides the resulting spectrum-matched 2-component horizontal acceleration, velocity and displacement time histories, and comparisons of the corresponding spectra with the target firm-ground spectrum. The vertical-component time histories for the design spectrum can be used for firm-ground conditions as well.

**Table 5-1. Time Histories Selected for OLE Spectral Matching**

Set	Earthquake	Magnitude	Station	Distance (km)
1	1989 Loma Prieta	6.9	Saratoga – Aloha Ave.	13.0
2	1987 Superstition Hill	6.3	Wildlife Liquefaction Array	24.7
3	1987 Whittier	6.0	Northridge-Saticoy St.	39.8
4	1979 Imperial Valley	6.5	EC CO Center FF	7.6
5	1979 Imperial Valley	6.5	Calexico Fire Station	10.6
6	1992 Erzikan	6.9	Erzikan	2.0
7	1994 Northridge	6.7	Century City, LACC	25.7

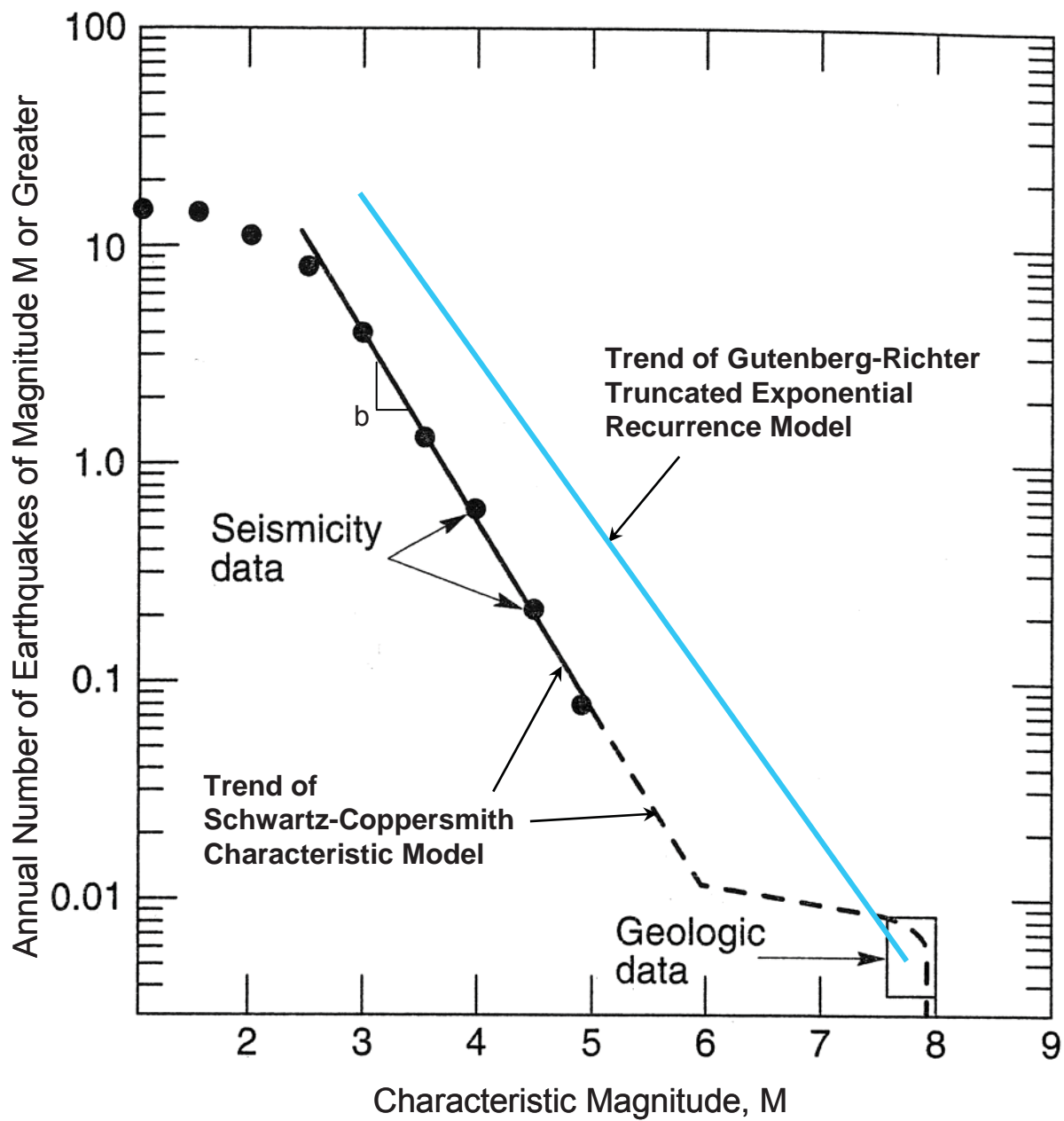
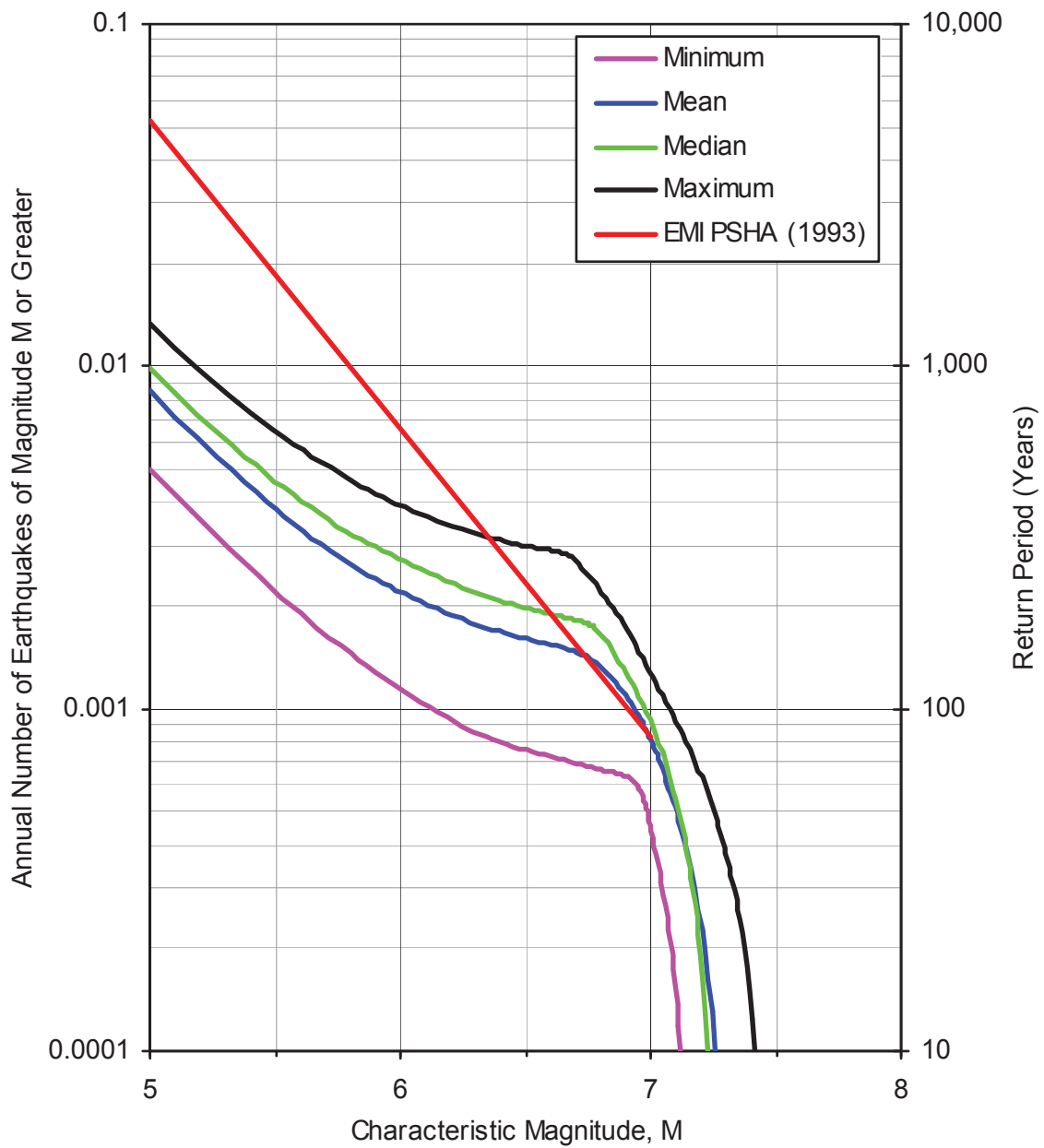


Figure 5-5. Historical Development of Recurrence Relationships



**Figure 5-6. Various Assumed Recurrence Rates of the Palos Verdes Fault**

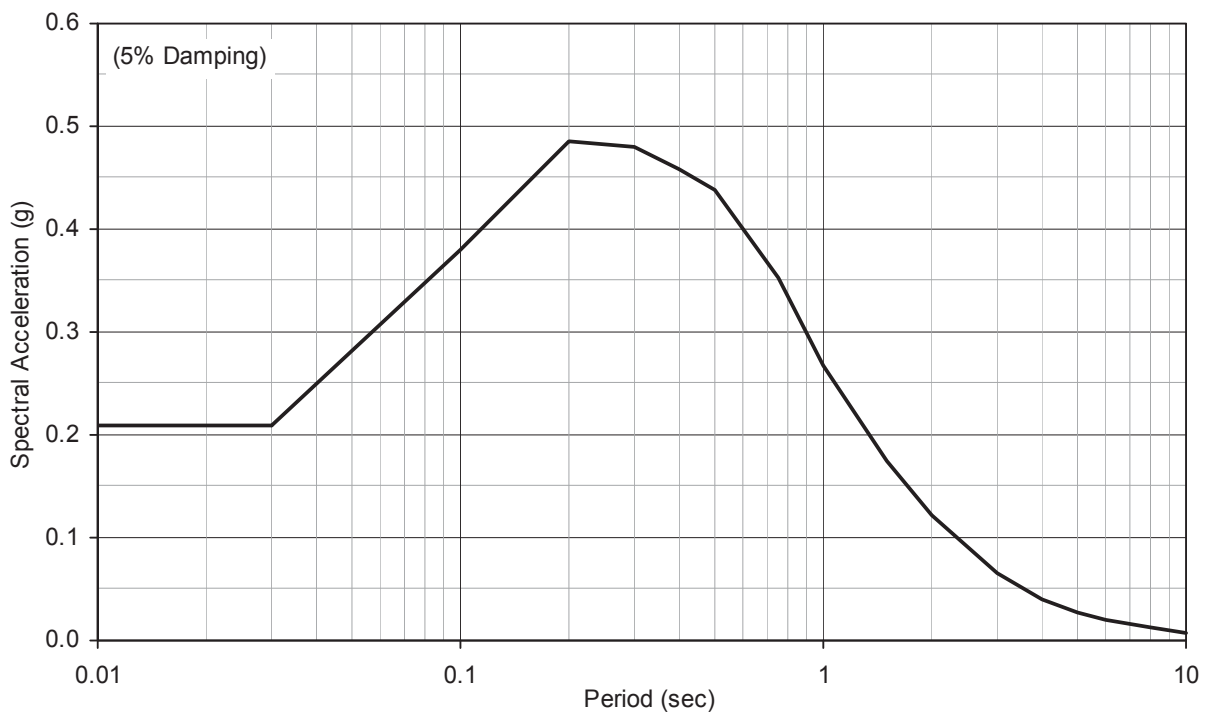
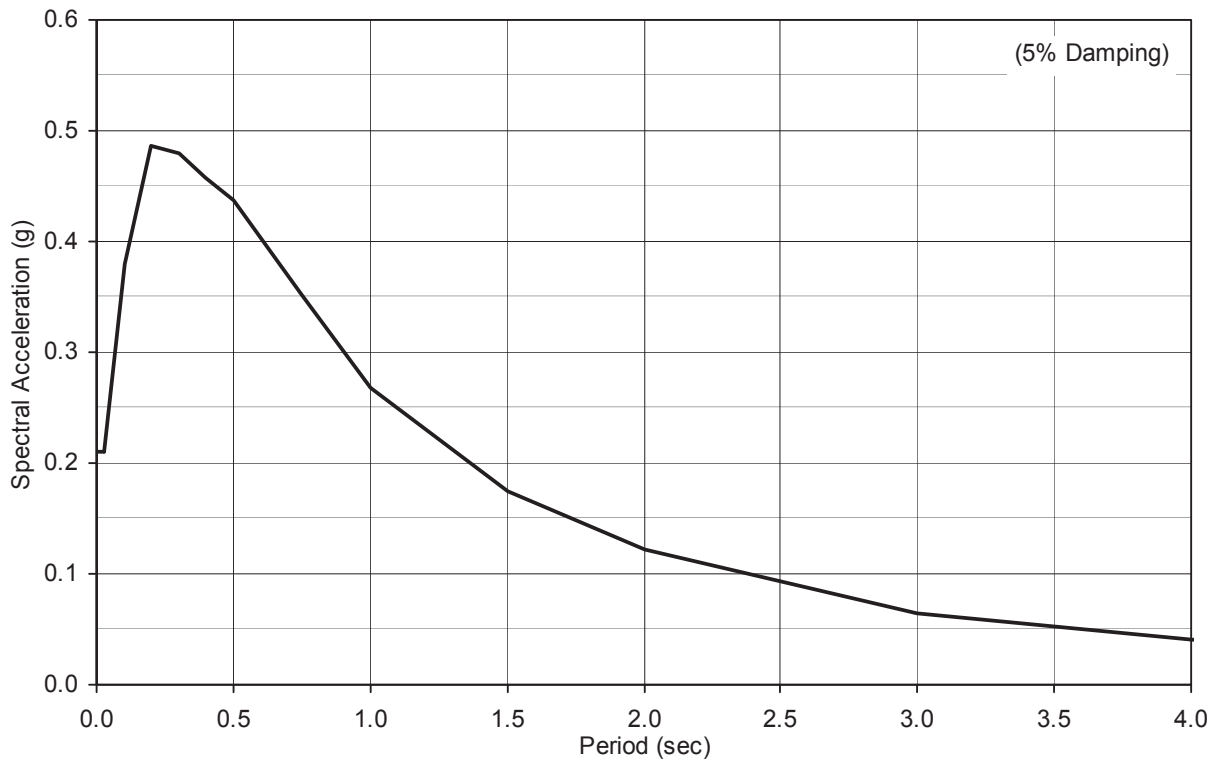
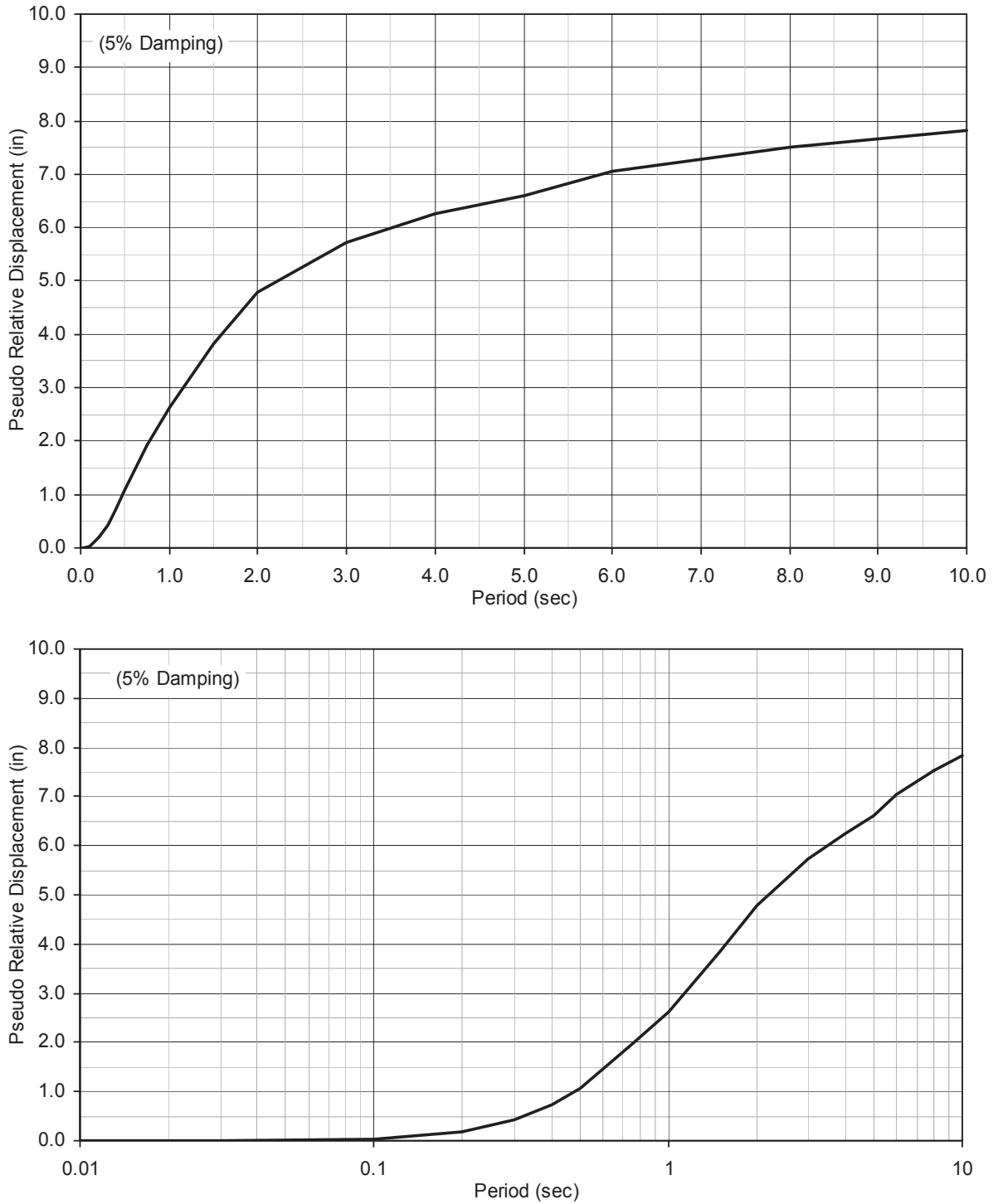


Figure 5-7. Recommended Design Spectrum (Horizontal Acceleration) for 72-yr Return Period (OLE)



**Figure 5-8. Recommended Design Spectrum (Horizontal Relative Displacement) for 72-yr Return Period (OLE)**

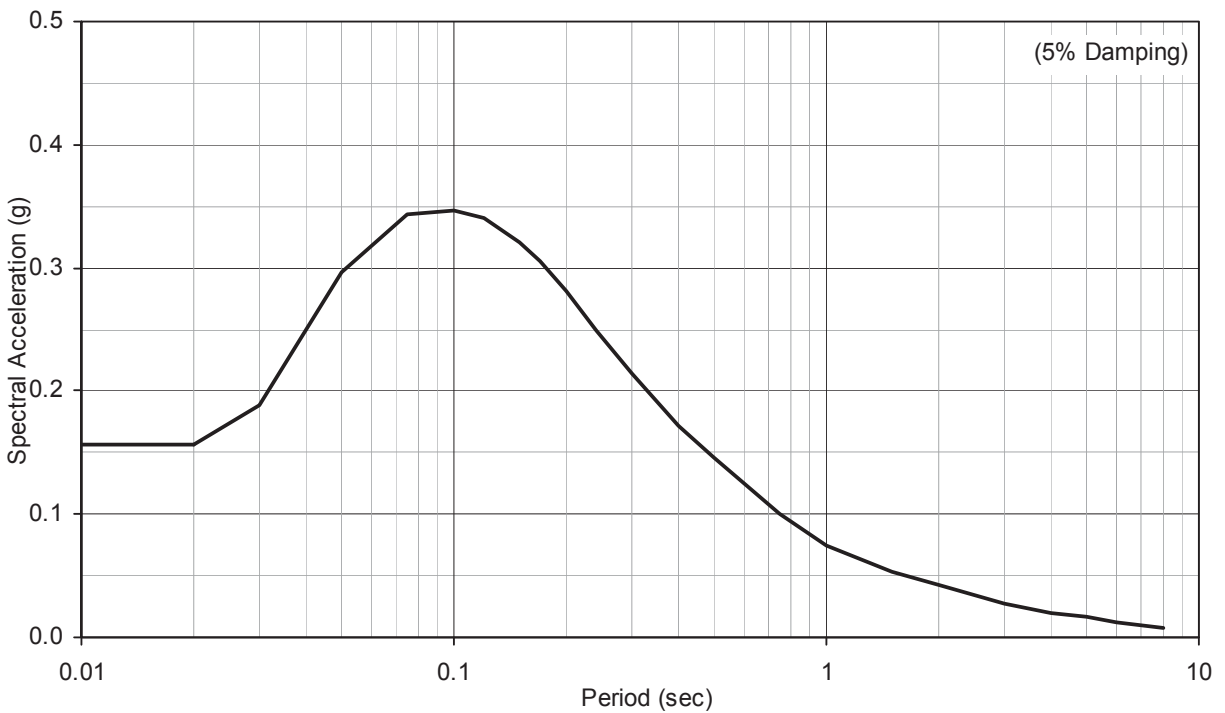
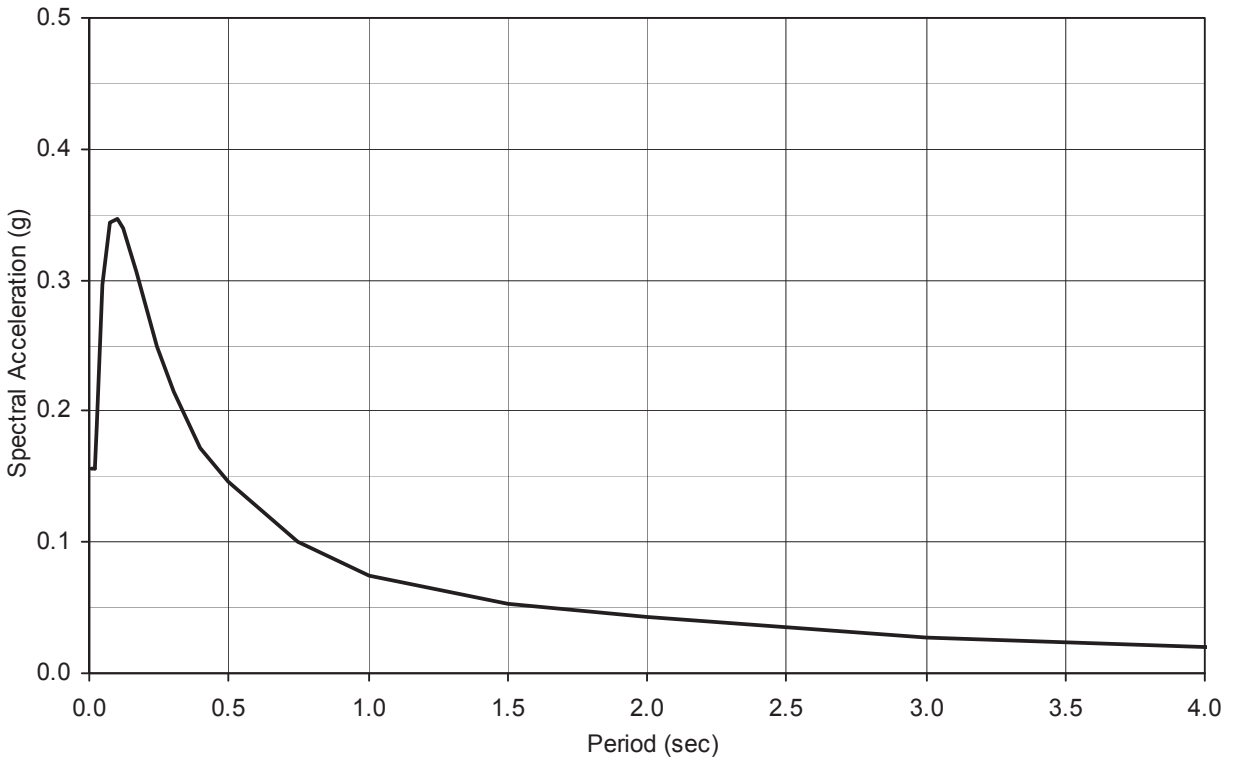


Figure 5-9. Recommended Firm-Ground and Design Spectrum (Vertical Acceleration) for 72-yr Return Period (OLE)



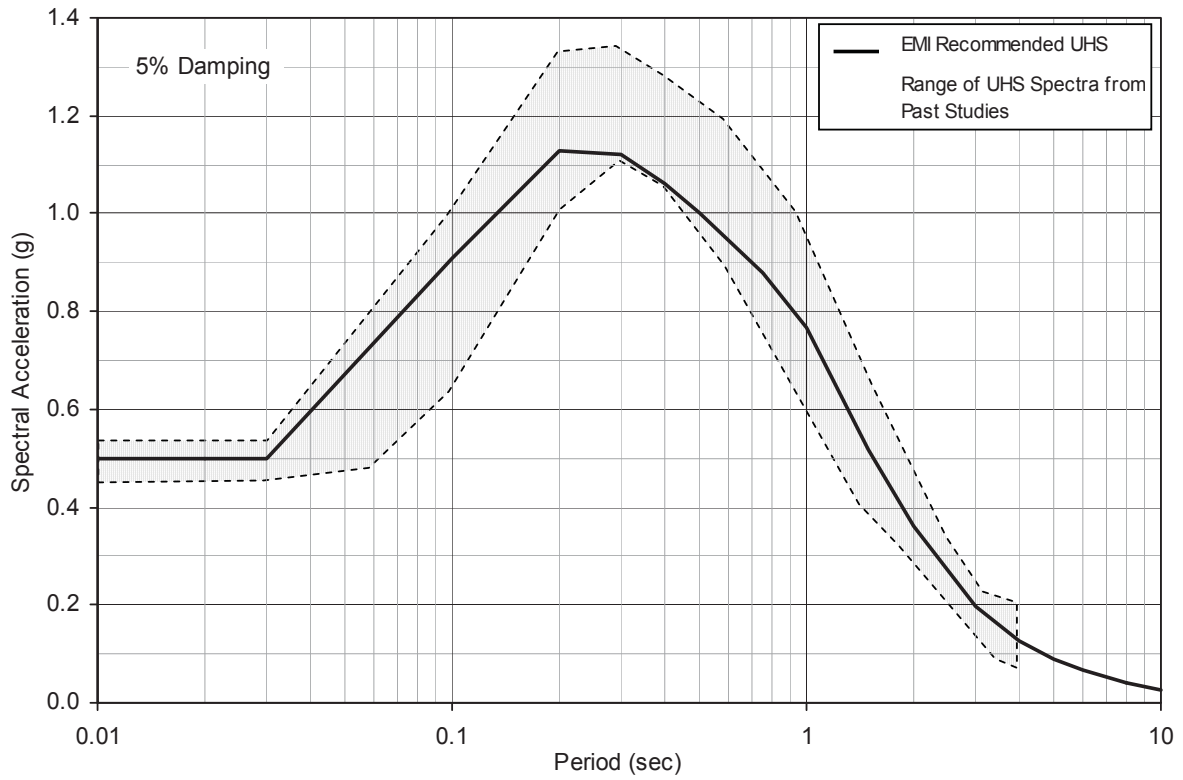
**Table 5-2. Spectral Values (Horizontal) for Recommended Design for 72-yr Return Period (OLE)**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)
0.01	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000
0.03	0.226	0.002	0.220	0.002	0.210	0.002	0.201	0.002	0.190	0.002	0.187	0.002
0.10	0.515	0.05	0.461	0.05	0.380	0.04	0.316	0.03	0.252	0.02	0.234	0.02
0.20	0.708	0.28	0.617	0.24	0.486	0.19	0.386	0.15	0.293	0.11	0.266	0.10
0.30	0.699	0.62	0.609	0.54	0.480	0.42	0.382	0.34	0.289	0.25	0.263	0.23
0.40	0.667	1.04	0.581	0.91	0.458	0.72	0.364	0.57	0.276	0.43	0.251	0.39
0.50	0.638	1.56	0.556	1.36	0.438	1.07	0.348	0.85	0.264	0.65	0.240	0.59
0.75	0.513	2.82	0.447	2.46	0.352	1.94	0.280	1.54	0.212	1.17	0.193	1.06
1.00	0.386	3.77	0.337	3.30	0.268	2.62	0.215	2.10	0.164	1.61	0.150	1.47
1.50	0.245	5.39	0.216	4.76	0.174	3.83	0.141	3.11	0.110	2.42	0.101	2.22
2.00	0.168	6.58	0.149	5.85	0.122	4.78	0.100	3.93	0.079	3.10	0.073	2.86
3.00	0.086	7.60	0.078	6.85	0.065	5.73	0.055	4.82	0.044	3.91	0.041	3.64
4.00	0.051	8.06	0.047	7.35	0.040	6.26	0.034	5.37	0.028	4.46	0.027	4.19
5.00	0.034	8.27	0.031	7.61	0.027	6.61	0.024	5.76	0.020	4.88	0.019	4.62
6.00	0.025	8.82	0.023	8.12	0.020	7.05	0.017	6.15	0.015	5.21	0.014	4.92
8.00	0.015	9.40	0.014	8.66	0.012	7.52	0.010	6.56	0.009	5.56	0.008	5.25
10.00	0.010	9.80	0.009	9.02	0.008	7.83	0.007	6.83	0.006	5.79	0.006	5.47

### 5.3.2 CLE Design Recommendations

#### 5.3.2.1 Design Spectra

Horizontal Design Spectrum. Figure 5-10 compares the port-wide theoretical site effect-adjusted UHS for CLE (475-yr return period) developed in Section 4.2 with a range of design CLE spectra recommended by other consultants. It can be seen from this figure that the current recommended spectrum is within the range of past historical CLE design spectra. The reason for this is the recurrence rates for large-magnitude (approximately M7) events assumed in this study are consistent with prior studies (see Figure 5-6) where the large magnitude recurrence rates are anchored to the geologic slip rate of the Palos Verdes and the Newport-Inglewood faults, which have remained largely unchanged in the past ten years.



**Figure 5-10. Comparison of Design UHS for 475-yr Return Period for CLE with Past CLE Spectra**

As a result, the port-wide theoretical site effect-adjusted UHS shown is recommended for port-wide design of structures, with a recommended PGA value for the CLE of 0.50g (with the corresponding dominant source of M 7.0 at a distance of 4 km) and minor adjustments to smooth acceleration and relative displacement spectra.

The resultant acceleration and pseudo relative displacement design spectra for 5% damping are given in Figure 5-11 and Figure 5-12, respectively. The spectral coordinates for a range of damping values are listed in Table 5-3.

Vertical Design Spectrum. The firm-ground vertical spectrum was derived from the firm-ground spectrum (Figure 3-11) and the V/H ratios (Figure 3-12). The recommended spectrum is shown in Figure 5-13. This spectrum may be used for both firm-ground conditions and design.

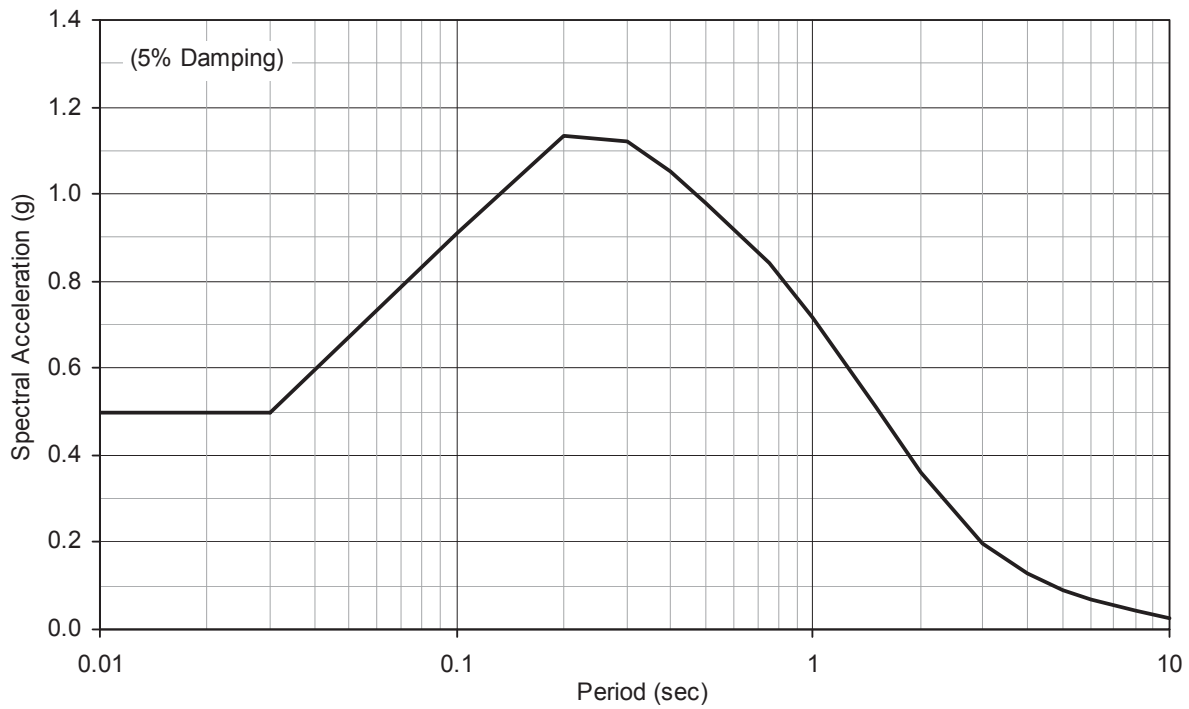
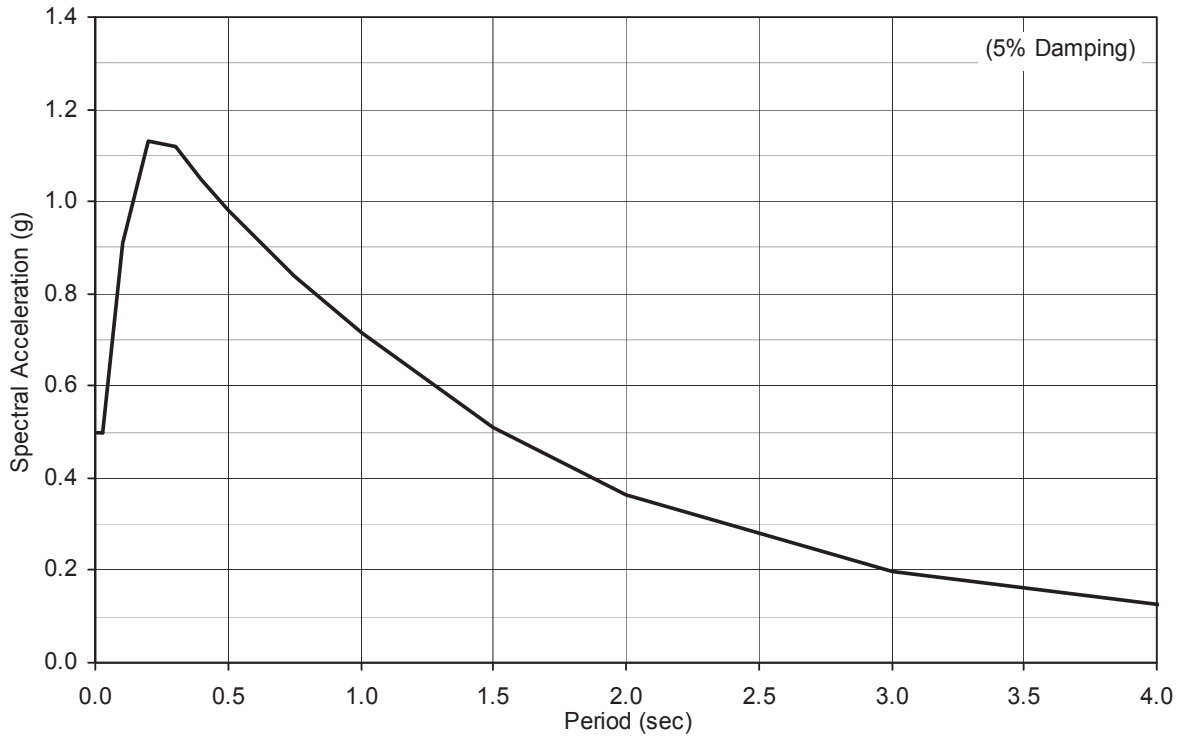
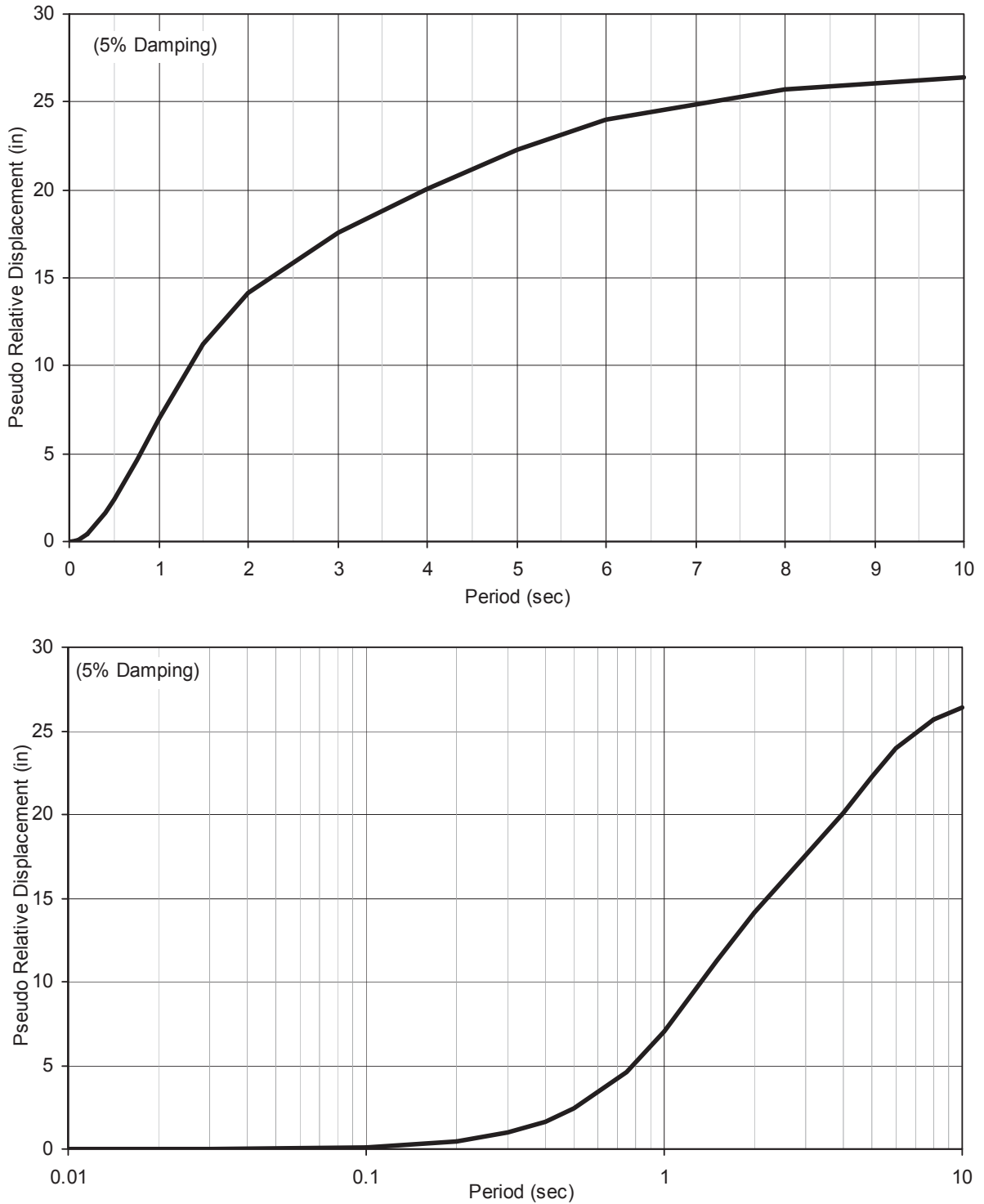
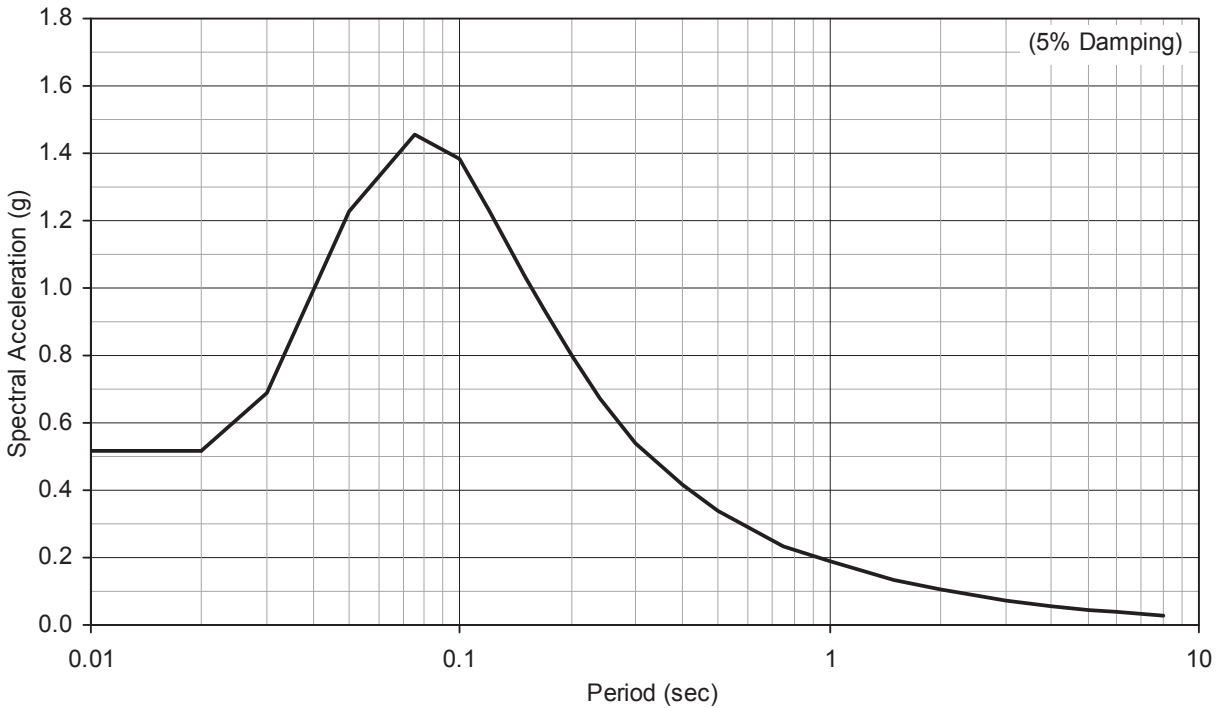
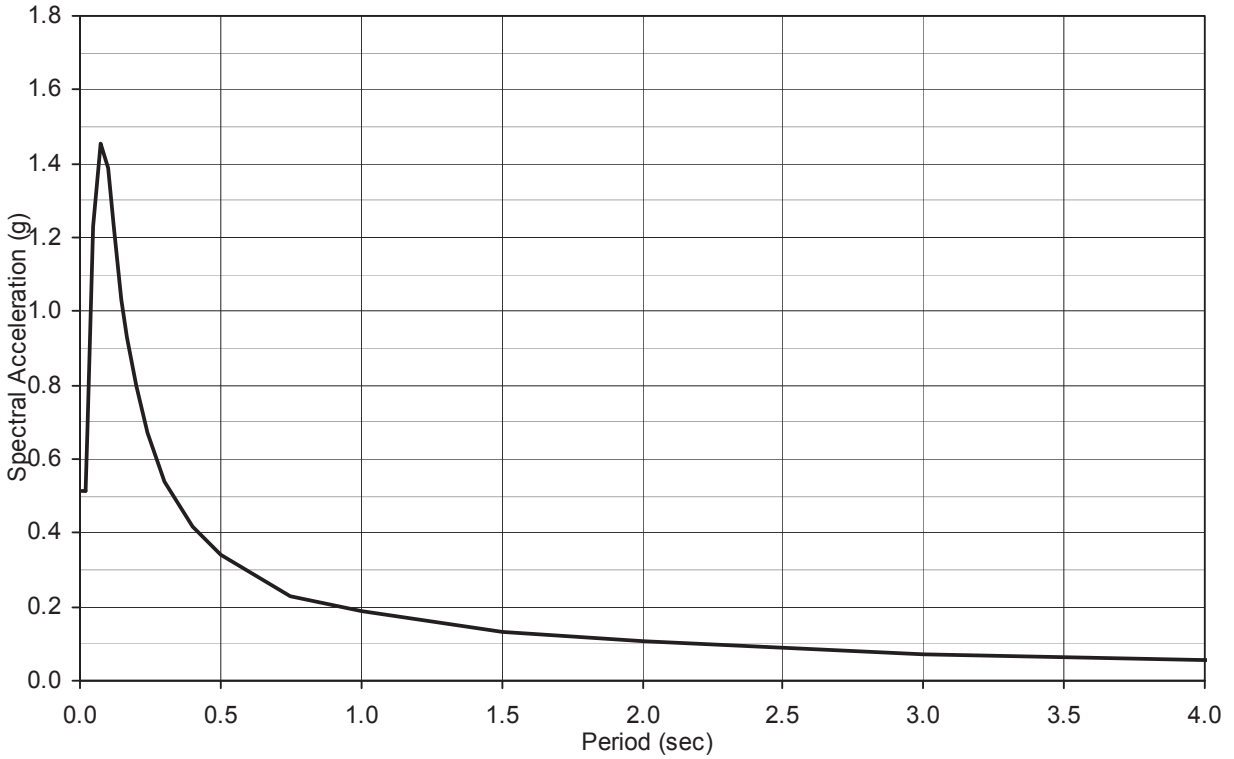


Figure 5-11. Recommended Design Spectrum (Horizontal Acceleration) for 475-yr Return Period (CLE)



**Figure 5-12. Recommended Design Spectrum (Horizontal Relative Displacement) for 475-yr Return Period (CLE)**



**Figure 5-13. Recommended Firm-Ground and Design Spectrum (Vertical Acceleration) for 475-yr Return Period (CLE)**

**Table 5-3. Spectral Values for Recommended Design for 475-yr Return Period (CLE)**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)	PSA (g)	Disp. (in)
0.01	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000
0.03	0.538	0.005	0.524	0.005	0.500	0.004	0.478	0.004	0.453	0.004	0.445	0.004
0.10	1.233	0.12	1.103	0.11	0.910	0.09	0.756	0.07	0.604	0.06	0.560	0.05
0.20	1.649	0.65	1.436	0.56	1.132	0.44	0.900	0.35	0.682	0.27	0.621	0.24
0.30	1.633	1.44	1.422	1.25	1.121	0.99	0.891	0.79	0.675	0.59	0.615	0.54
0.40	1.529	2.39	1.332	2.09	1.050	1.64	0.835	1.31	0.632	0.99	0.576	0.90
0.50	1.427	3.49	1.243	3.04	0.980	2.40	0.779	1.91	0.590	1.44	0.537	1.31
0.75	1.223	6.73	1.066	5.87	0.840	4.62	0.668	3.68	0.506	2.79	0.460	2.54
1.00	1.039	10.17	0.907	8.87	0.717	7.02	0.572	5.60	0.435	4.26	0.396	3.88
1.50	0.729	16.07	0.640	14.09	0.510	11.23	0.410	9.03	0.315	6.93	0.288	6.34
2.00	0.511	19.99	0.450	17.62	0.362	14.17	0.294	11.49	0.228	8.91	0.209	8.17
3.00	0.273	24.07	0.243	21.43	0.199	17.53	0.164	14.45	0.130	11.43	0.120	10.56
4.00	0.172	26.86	0.154	24.12	0.128	20.05	0.107	16.77	0.086	13.51	0.080	12.56
5.00	0.119	29.17	0.108	26.42	0.091	22.27	0.077	18.89	0.063	15.47	0.059	14.46
6.00	0.089	31.39	0.081	28.43	0.068	23.96	0.058	20.32	0.047	16.65	0.044	15.55
8.00	0.054	33.65	0.049	30.47	0.041	25.68	0.035	21.78	0.028	17.84	0.027	16.67
10.00	0.035	34.62	0.032	31.36	0.027	26.43	0.023	22.41	0.019	18.36	0.018	17.16

### 5.3.2.2 Spectrum-Compatible Time Histories

The seven (7) sets of 3-component startup firm-ground time histories (see Table 3-8) selected for CLE were modified to be spectrum-compatible to the design response spectra of Figure 5-11 and Figure 5-13 adjusted for the site-specific soil conditions. The spectrum-matched three-component acceleration, velocity and displacement time histories, and comparisons of the corresponding spectra with the target design spectrum are provided in Appendix D.3. The vertical-component time histories developed for firm-ground conditions are applicable for design evaluations as well.

### 5.3.3 Firm-Ground Sites

It should be noted that for sites where the top of stiff soil as described in Section 3.2.1, is encountered (either in their existing condition or due to ground improvement to mitigate soil liquefaction concerns) at or above El. -10 ft MLLW and the soil thickness above it is no more than 25 ft, the firm-ground UHS may be used for design.

## 5.4 NEWMARK DISPLACEMENTS

Simplified Newmark sliding block-type analyses were conducted to estimate lateral ground displacements due to the CLE and OLE firm-ground motions. The methodology of analysis and the resulting ground displacements are provided in Appendix E. Figure 6-7 and Table 6-5

provide the recommended lateral ground displacement versus yield acceleration curves for both events.

Because these analyses are based on the firm-ground outcropping motions, the recommended curves are considered conservative and may be used as a screening tool to determine if a particular project requires further evaluations such as site-specific site response analysis and/or soil-structure interaction analysis. The benefits of such analyses to the project should be clearly demonstrated and approval should be obtained from the Port before performing these analyses.

## SECTION 6 DESIGN RECOMMENDATIONS

Based on the port-wide ground motion study completed by EMI as described in this report, the following recommendations are made:

- (1) The horizontal and vertical firm-ground uniform hazard spectra (UHS) for 5% damping for the operating level earthquake (OLE), which correspond to a 72-yr return period, are provided in Figure 6-1 and Table 6-1. The horizontal and vertical firm-ground spectra for the contingency level earthquake (CLE), which correspond to a 475-yr return period, are provided in Figure 6-2 and Table 6-2. A total of seven (7) sets of spectrum-compatible 3-component time histories for firm-ground spectra for both CLE and OLE are provided in Appendix D.1 and D.2, respectively.
- (2) The horizontal acceleration and pseudo relative displacement spectra for port structure design (for 5% damping, including site response effects) are shown in Figure 6-3 and Figure 6-4 for OLE, and in Figure 6-5 and Figure 6-6 for the CLE, respectively. The acceleration and relative displacement values for a range of damping ratios are provided in Table 6-3 for the OLE and Table 6-4 for CLE. A total of seven (7) sets of spectrum-compatible time histories for port design for both CLE and OLE are provided in Appendix D.3 and D.4, respectively.
- (3) For vertical UHS for port design, the firm-ground UHS (Figure 6-1 and Table 6-1 for OLE, Figure 6-2 and Table 6-2 for CLE) may be used.
- (4) For sites where soil with an average shear wave velocity (as defined in Section 2.3) of about 1,000 ft/sec is encountered at a maximum depth of 25 ft below ground surface and at or above El. -10 ft MLLW, the firm-ground UHS (Figure 6-1 and Table 6-1 for OLE, and Figure 6-2 and Table 6-2 for CLE) may be used for structure design.
- (5) The recommended peak ground acceleration (PGA) value corresponding to the OLE for geotechnical evaluations is 0.21g. The corresponding dominant source is recommended as a M 6.5 earthquake at a distance of 20 km. The recommended PGA value corresponding to the CLE is 0.50g with the corresponding dominant source of M 7.0 at a distance of 4 km.
- (6) The appropriateness of the recommended design spectra for sites with unique subsurface conditions that are significantly outside the range of soil profiles covered in this study should be determined on a project-specific basis.
- (7) The recommended Newmark displacement estimates curves shown in Figure 6-7 and Table 6-5 may be used as a screening tool to determine if more detailed analyses such as site-specific site response analysis and/or soil-structure interaction analysis are



needed for a particular project. The benefits of such analyses to the project should be clearly demonstrated and approval by the Port should be obtained before conducting these analyses.

- (8) Recommendations for future design practice are provided in Section 7.
- (9) It is suggested that the recommendations provided in this report be reviewed and revised as necessary on a regular basis to include the latest developments in the seismological, geological, and geotechnical communities. Specifically, it is recommended that the first review be performed in about two to three years from the date of this report to incorporate the findings from the on-going PEER NGA study. Subsequent reviews may be performed every five years or as necessary based on further developments in the state of practice.

**Table 6-1. Firm-Ground Spectra for OLE (5% Damping)**

Period (sec)	Average Horizontal Acceleration (g)	Vertical Acceleration (g)
0.010	0.208	0.156
0.020	0.208	0.156
0.030	0.208	0.189
0.050	0.281	0.296
0.075	0.339	0.344
0.100	0.380	0.346
0.120	0.408	0.340
0.150	0.442	0.321
0.170	0.461	0.306
0.200	0.486	0.281
0.240	0.483	0.250
0.300	0.479	0.215
0.400	0.431	0.172
0.500	0.395	0.146
0.750	0.283	0.100
1.000	0.212	0.074
1.500	0.152	0.053
2.000	0.115	0.043
3.000	0.063	0.027
4.000	0.039	0.020
5.000	0.027	0.016
6.000	0.020	0.012
8.000	0.012	0.008
10.000	0.008	0.005

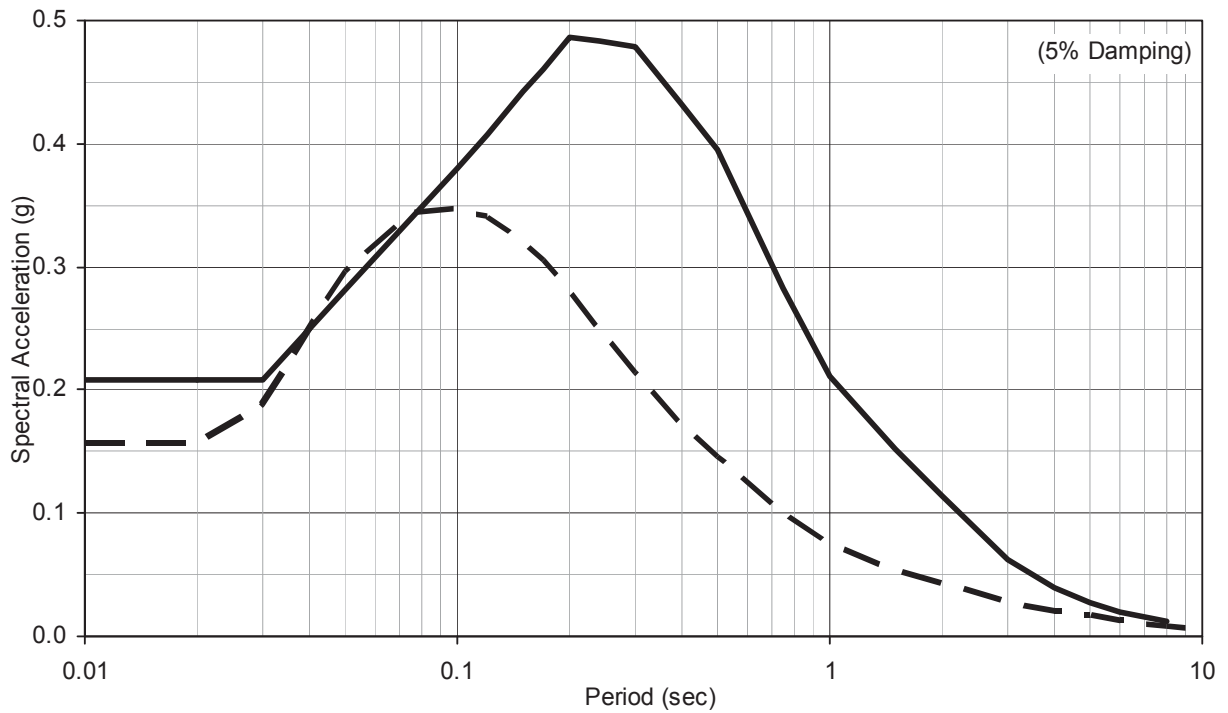
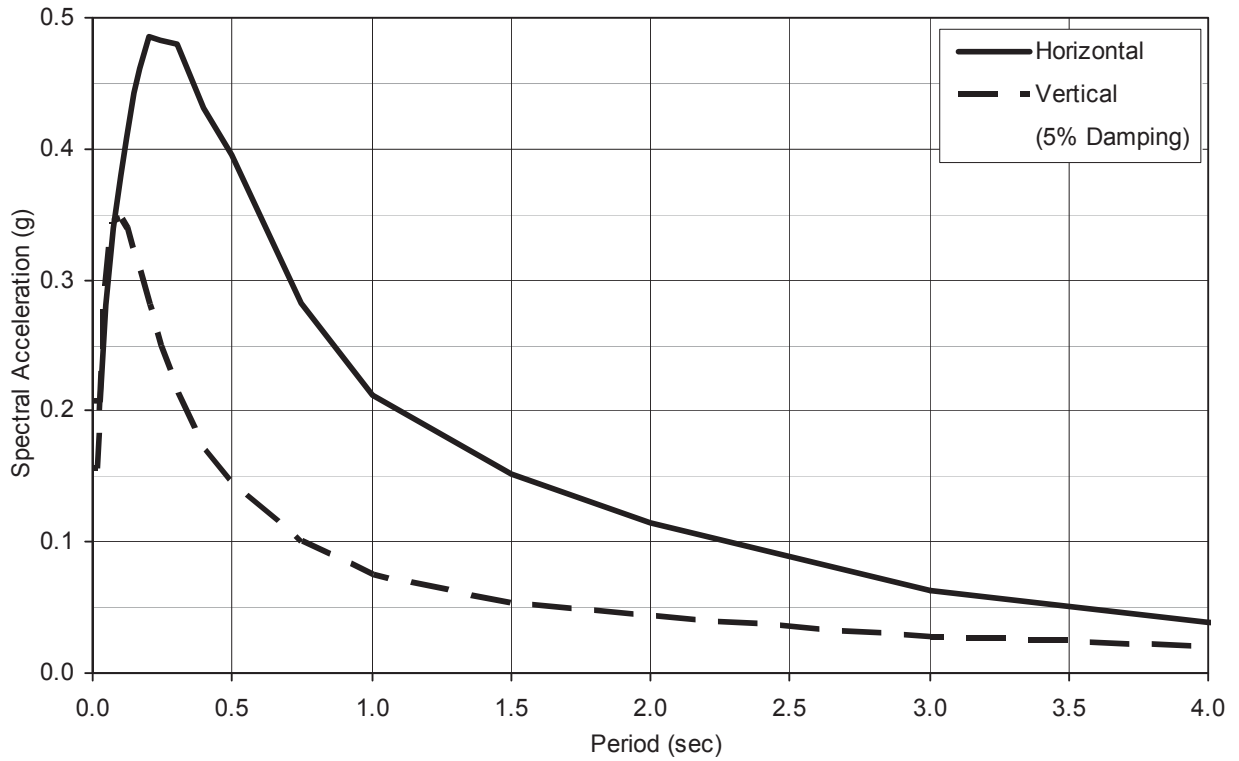


Figure 6-1. Recommended Firm-Ground Spectra for OLE (5% Damping)

**Table 6-2. Firm-Ground Spectra for CLE (5% Damping)**

Period (sec)	Average Horizontal Acceleration (g)	Vertical Acceleration (g)
0.010	0.496	0.515
0.020	0.496	0.515
0.030	0.496	0.687
0.050	0.672	1.229
0.075	0.811	1.456
0.100	0.910	1.386
0.120	0.968	1.231
0.150	1.040	1.032
0.170	1.080	0.928
0.200	1.132	0.800
0.240	1.127	0.672
0.300	1.121	0.540
0.400	1.029	0.418
0.500	0.958	0.340
0.750	0.734	0.231
1.000	0.618	0.186
1.500	0.446	0.131
2.000	0.329	0.108
3.000	0.193	0.073
4.000	0.127	0.056
5.000	0.091	0.045
6.000	0.067	0.036
8.000	0.040	0.027
10.000	0.026	0.017

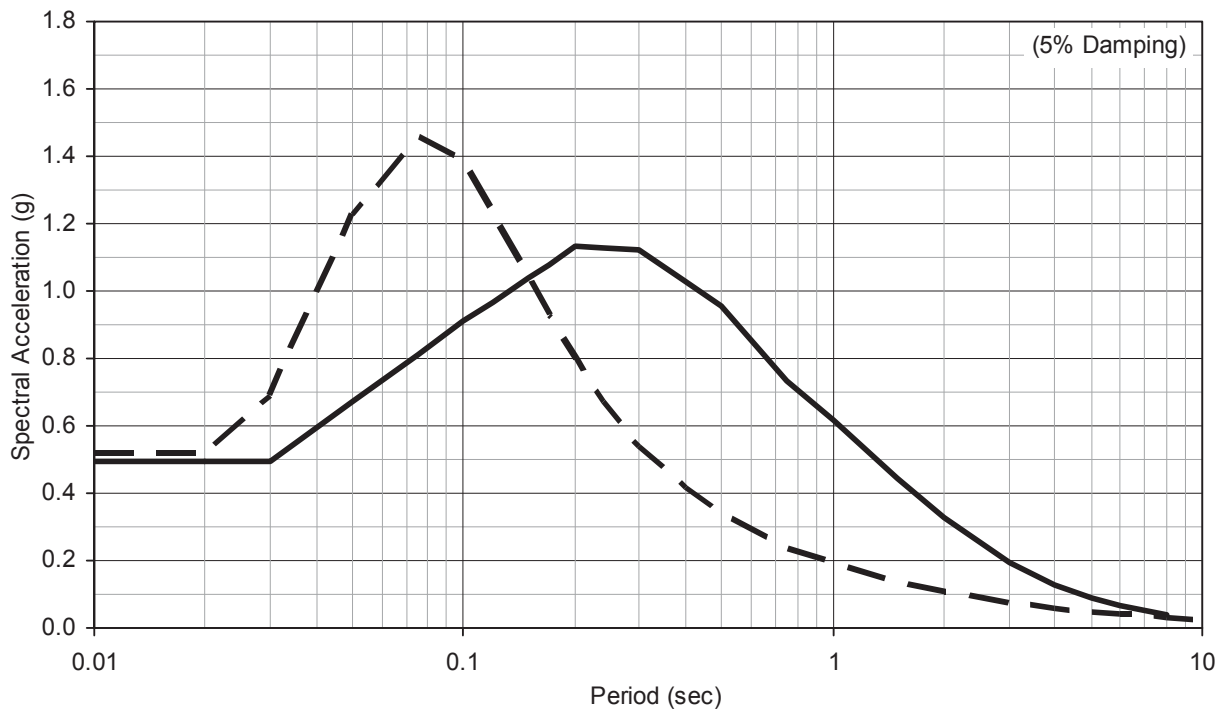
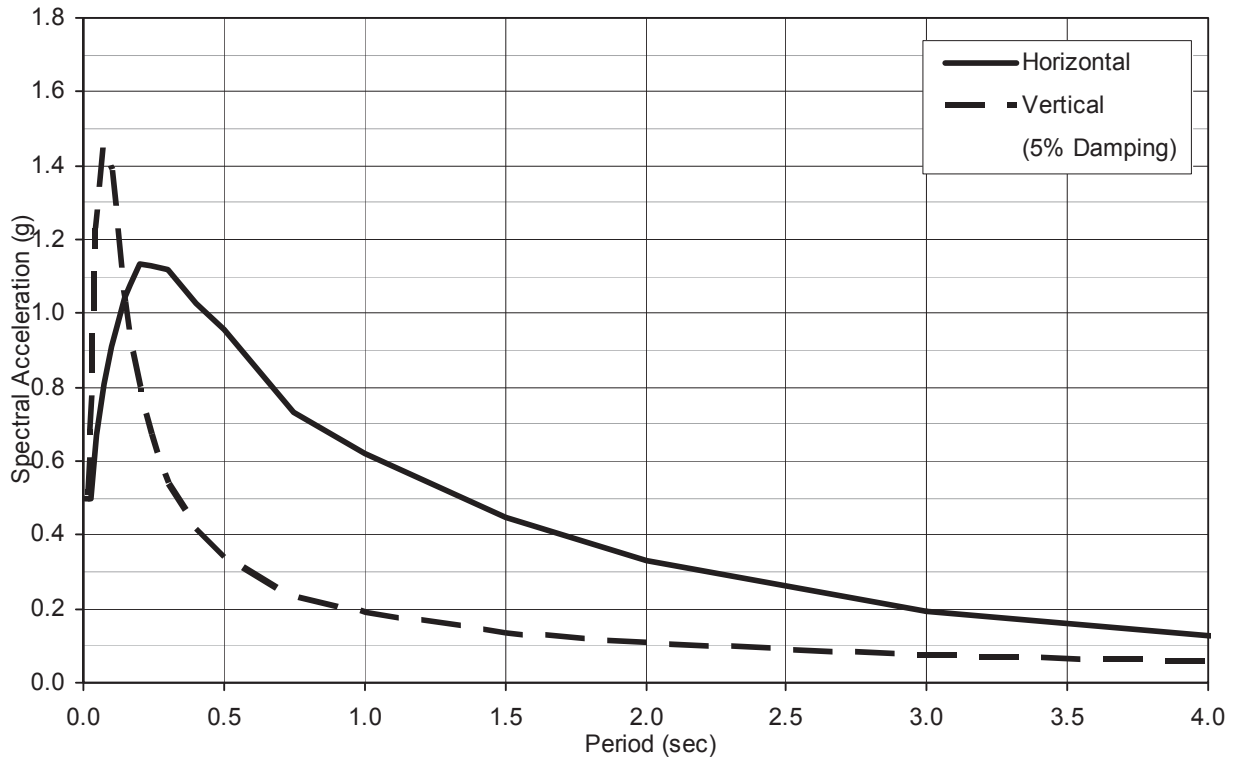
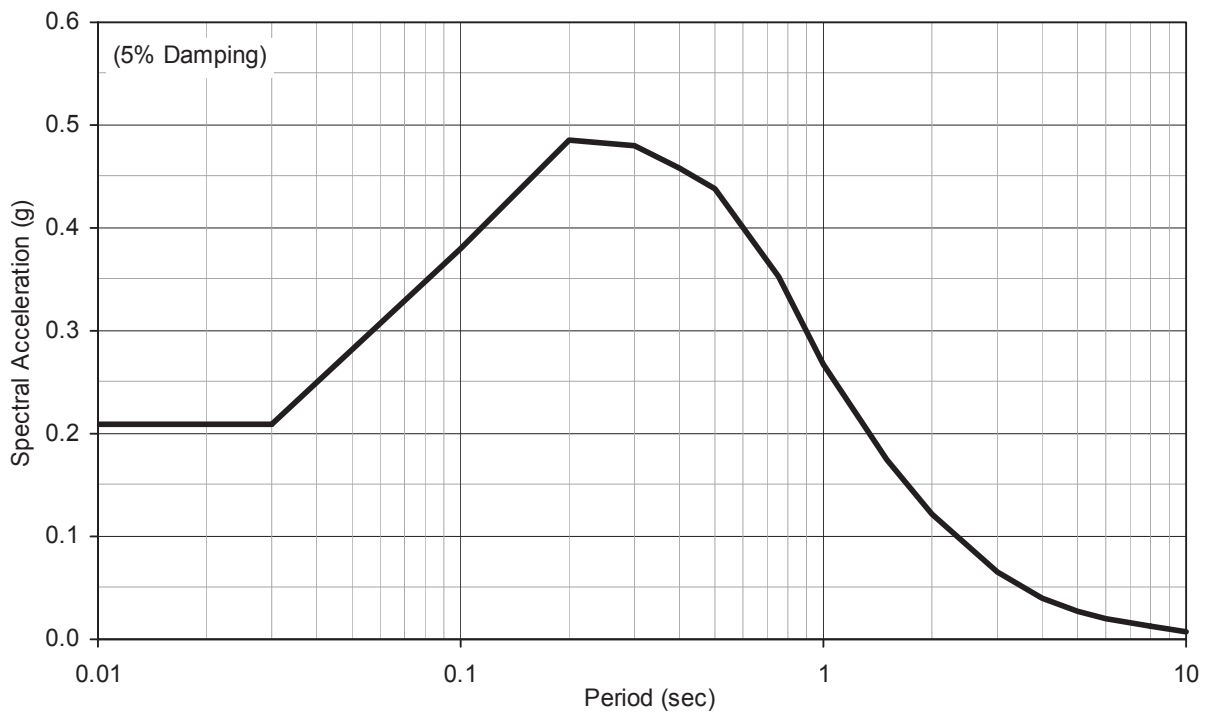
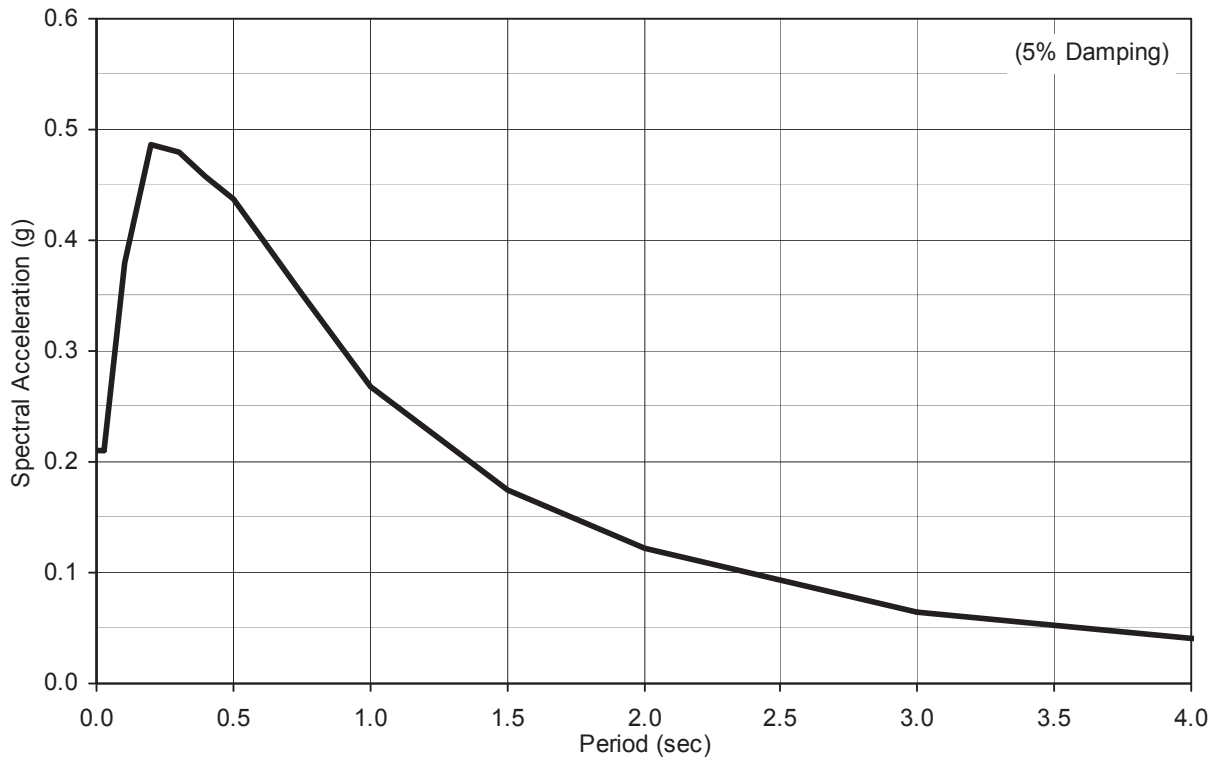


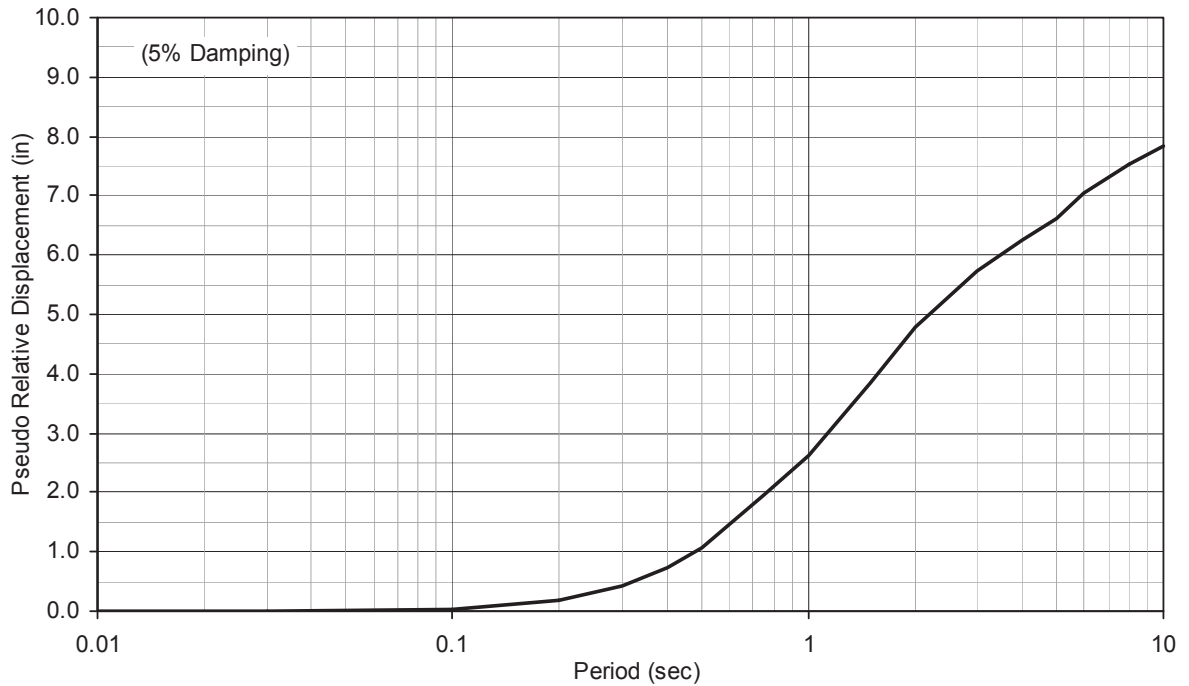
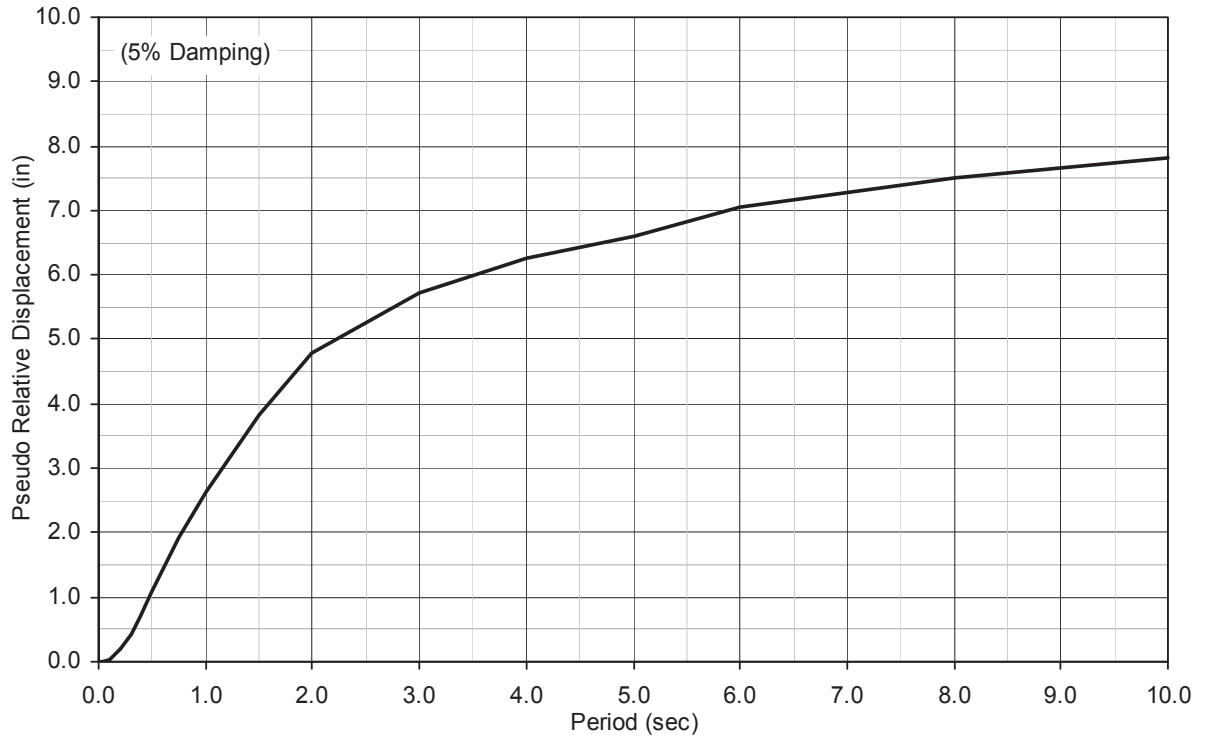
Figure 6-2. Recommended Firm-Ground Spectra for CLE (5% Damping)

**Table 6-3. Recommended Horizontal Design Spectra for OLE**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)
0.01	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000	0.210	0.000
0.03	0.226	0.002	0.220	0.002	0.210	0.002	0.201	0.002	0.190	0.002	0.187	0.002
0.10	0.515	0.05	0.461	0.05	0.380	0.04	0.316	0.03	0.252	0.02	0.234	0.02
0.20	0.708	0.28	0.617	0.24	0.486	0.19	0.386	0.15	0.293	0.11	0.266	0.10
0.30	0.699	0.62	0.609	0.54	0.480	0.42	0.382	0.34	0.289	0.25	0.263	0.23
0.40	0.667	1.04	0.581	0.91	0.458	0.72	0.364	0.57	0.276	0.43	0.251	0.39
0.50	0.638	1.56	0.556	1.36	0.438	1.07	0.348	0.85	0.264	0.65	0.240	0.59
0.75	0.513	2.82	0.447	2.46	0.352	1.94	0.280	1.54	0.212	1.17	0.193	1.06
1.00	0.386	3.77	0.337	3.30	0.268	2.62	0.215	2.10	0.164	1.61	0.150	1.47
1.50	0.245	5.39	0.216	4.76	0.174	3.83	0.141	3.11	0.110	2.42	0.101	2.22
2.00	0.168	6.58	0.149	5.85	0.122	4.78	0.100	3.93	0.079	3.10	0.073	2.86
3.00	0.086	7.60	0.078	6.85	0.065	5.73	0.055	4.82	0.044	3.91	0.041	3.64
4.00	0.051	8.06	0.047	7.35	0.040	6.26	0.034	5.37	0.028	4.46	0.027	4.19
5.00	0.034	8.27	0.031	7.61	0.027	6.61	0.024	5.76	0.020	4.88	0.019	4.62
6.00	0.025	8.82	0.023	8.12	0.020	7.05	0.017	6.15	0.015	5.21	0.014	4.92
8.00	0.015	9.40	0.014	8.66	0.012	7.52	0.010	6.56	0.009	5.56	0.008	5.25
10.0	0.010	9.80	0.009	9.02	0.008	7.83	0.007	6.83	0.006	5.79	0.006	5.47



**Figure 6-3. Recommended Design Spectrum (Horizontal Acceleration) for OLE (5% Damping)**

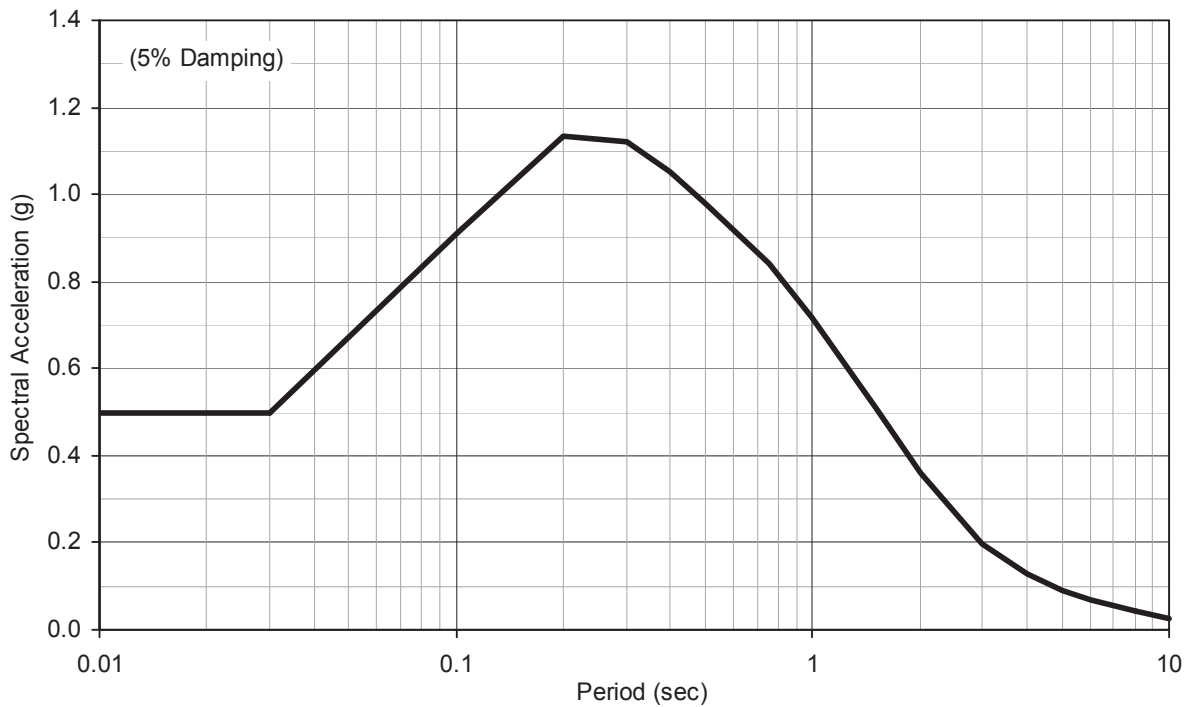
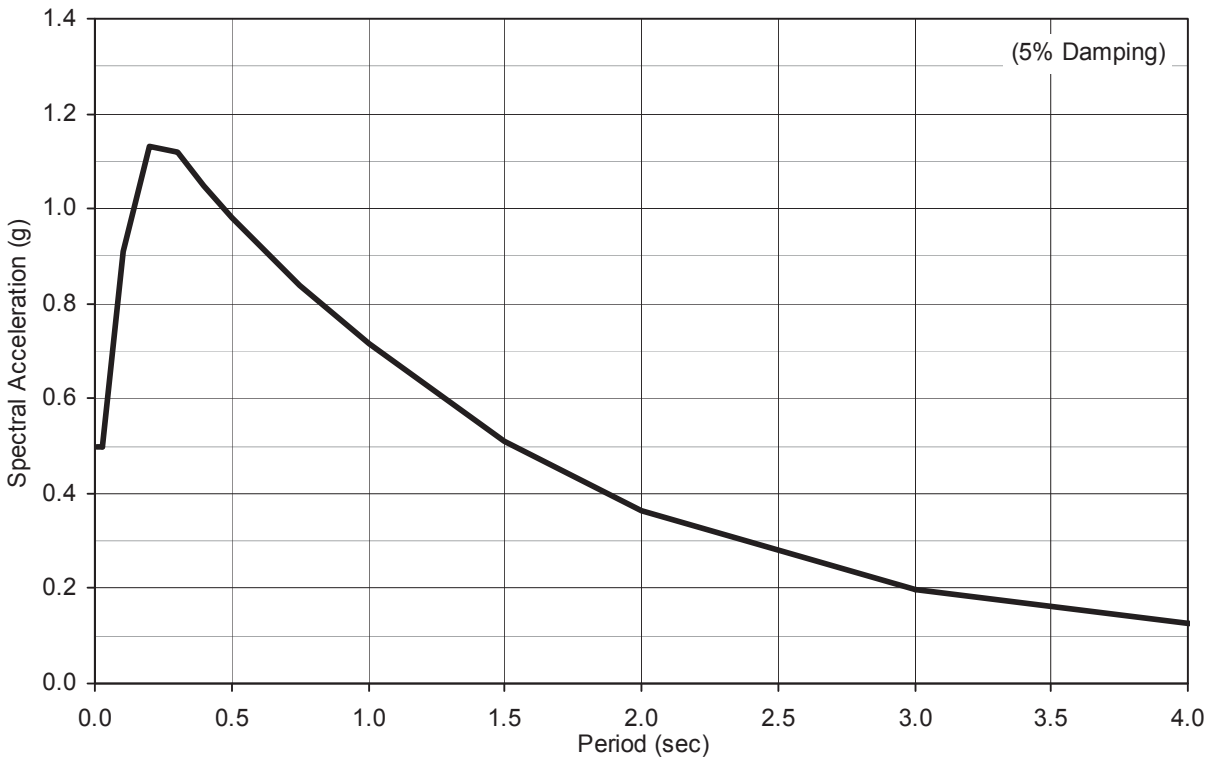


**Figure 6-4. Recommended Design Spectrum (Horizontal Relative Displacement) for OLE (5% Damping)**

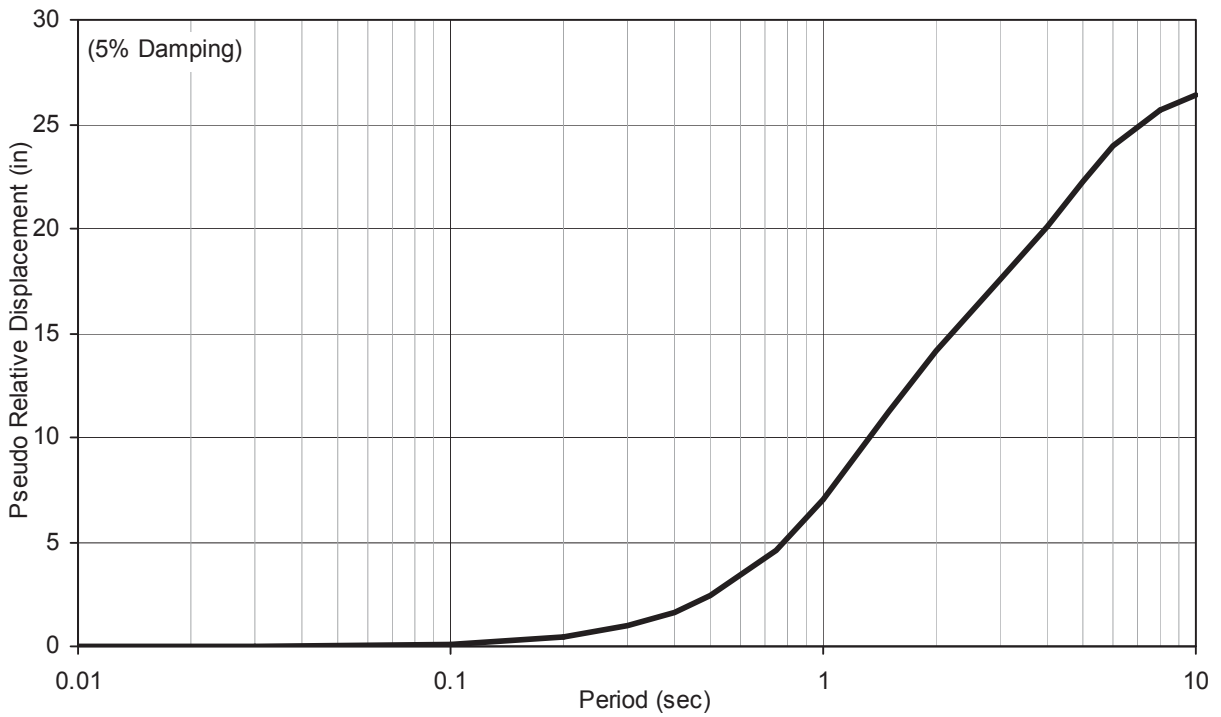
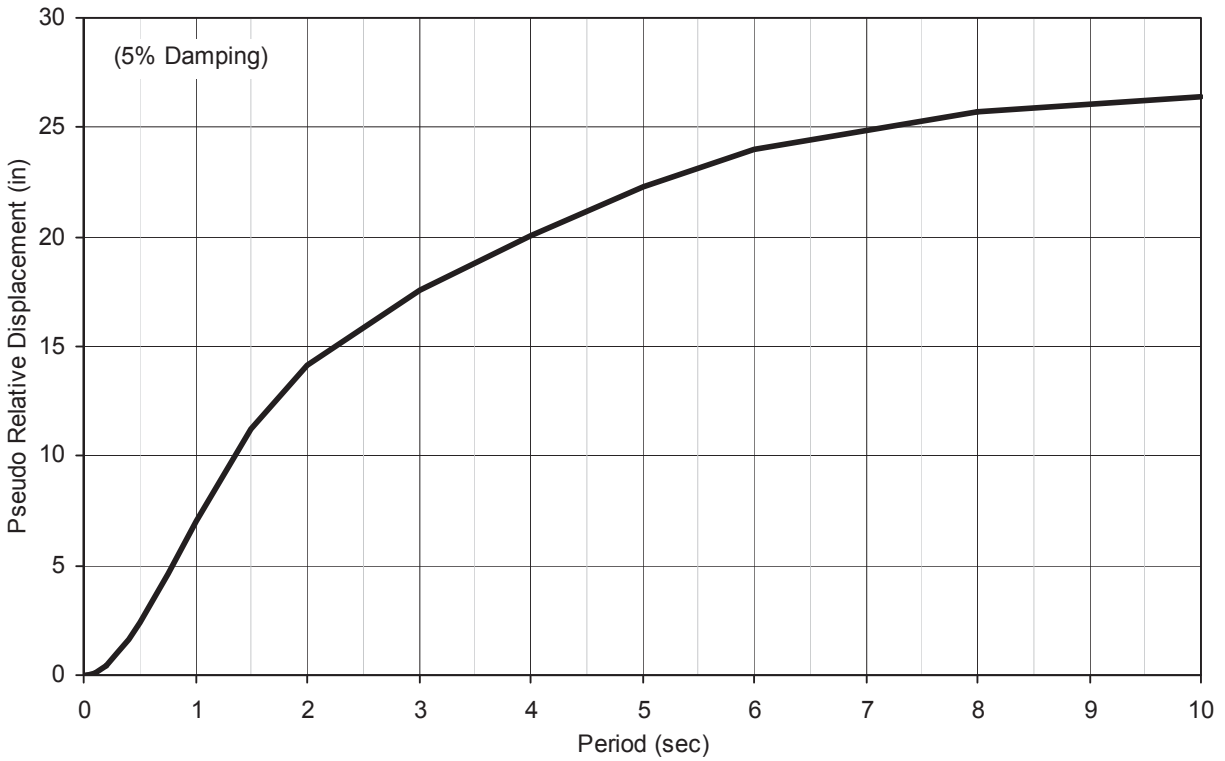
**Table 6-4. Recommended Horizontal Design Spectra for CLE**

Period (sec)	Damping											
	1%		2%		5%		10%		20%		25%	
	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)	Acc. (g)	Displ. (in)
0.01	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000	0.500	0.000
0.03	0.538	0.005	0.524	0.005	0.500	0.004	0.478	0.004	0.453	0.004	0.445	0.004
0.10	1.233	0.12	1.103	0.11	0.910	0.09	0.756	0.07	0.604	0.06	0.560	0.05
0.20	1.649	0.65	1.436	0.56	1.132	0.44	0.900	0.35	0.682	0.27	0.621	0.24
0.30	1.633	1.44	1.422	1.25	1.121	0.99	0.891	0.79	0.675	0.59	0.615	0.54
0.40	1.529	2.39	1.332	2.09	1.050	1.64	0.835	1.31	0.632	0.99	0.576	0.90
0.50	1.427	3.49	1.243	3.04	0.980	2.40	0.779	1.91	0.590	1.44	0.537	1.31
0.75	1.223	6.73	1.066	5.87	0.840	4.62	0.668	3.68	0.506	2.79	0.460	2.54
1.00	1.039	10.17	0.907	8.87	0.717	7.02	0.572	5.60	0.435	4.26	0.396	3.88
1.50	0.729	16.07	0.640	14.09	0.510	11.23	0.410	9.03	0.315	6.93	0.288	6.34
2.00	0.511	19.99	0.450	17.62	0.362	14.17	0.294	11.49	0.228	8.91	0.209	8.17
3.00	0.273	24.07	0.243	21.43	0.199	17.53	0.164	14.45	0.130	11.43	0.120	10.56
4.00	0.172	26.86	0.154	24.12	0.128	20.05	0.107	16.77	0.086	13.51	0.080	12.56
5.00	0.119	29.17	0.108	26.42	0.091	22.27	0.077	18.89	0.063	15.47	0.059	14.46
6.00	0.089	31.39	0.081	28.43	0.068	23.96	0.058	20.32	0.047	16.65	0.044	15.55
8.00	0.054	33.65	0.049	30.47	0.041	25.68	0.035	21.78	0.028	17.84	0.027	16.67
10.0	0.035	34.62	0.032	31.36	0.027	26.43	0.023	22.41	0.019	18.36	0.018	17.16





**Figure 6-5. Recommended Design Spectrum (Horizontal Acceleration) for CLE (5% Damping)**



**Figure 6-6. Recommended Design Spectrum (Horizontal Relative Displacement) for CLE (5% Damping)**

**Table 6-5. Recommended Newmark Displacement Estimates for Site Screening**

<b>Yield Acceleration (g)</b>	<b>Slope Displacement due to OLE (in)</b>	<b>Slope Displacement due to CLE (in)</b>
0.03	10.0	58
0.05	4.0	32
0.075	1.5	18
0.10	1.0	11
0.15	0.5	4.0
0.20	< 0.5	2.0
0.25	< 0.5	1.0
0.30	< 0.5	< 0.5

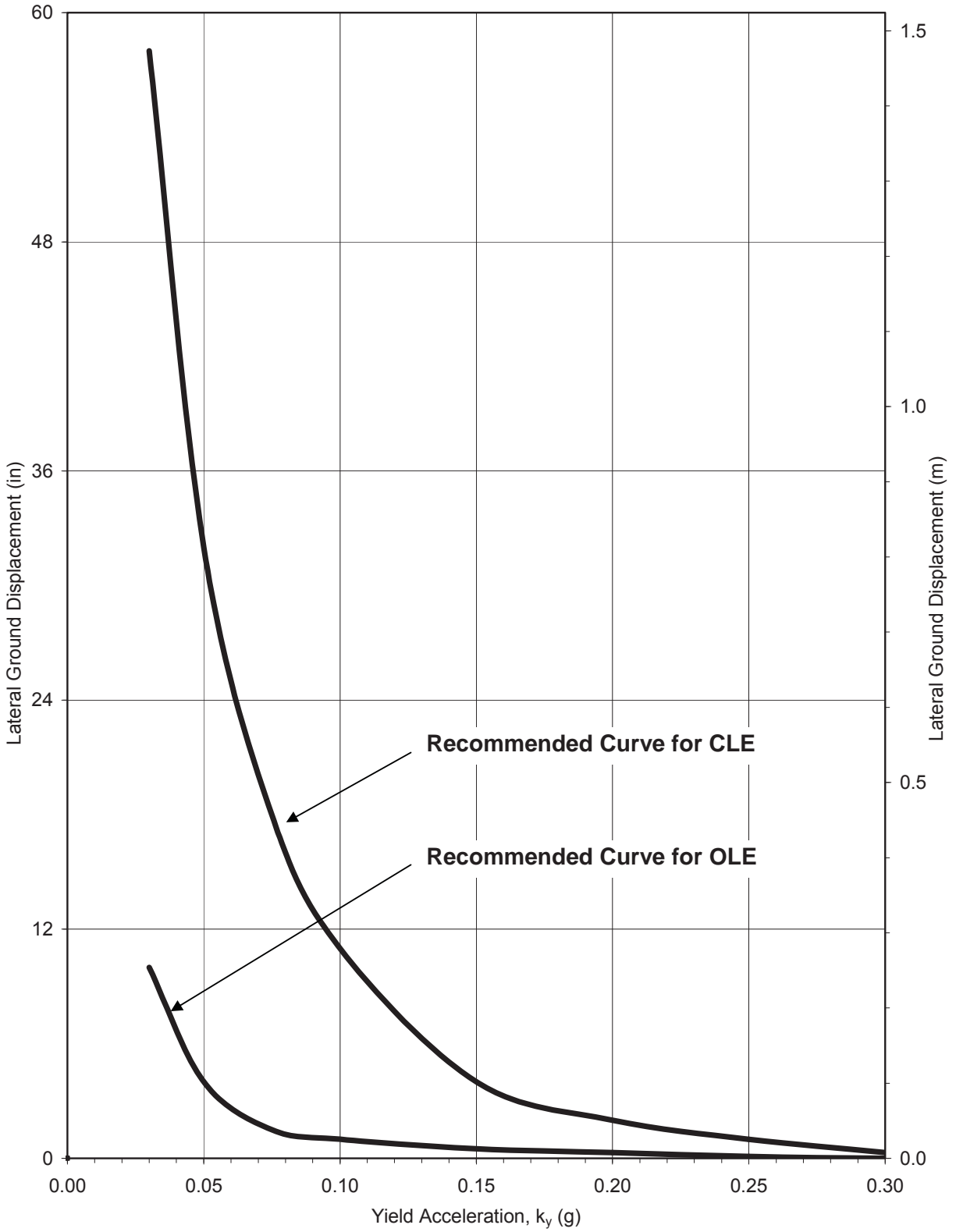


Figure 6-7. Recommended Newmark Displacement Curves for Site Screening

## SECTION 7

# FUTURE DESIGN PRACTICE GUIDELINES

The following guidelines are offered to help minimize unintended variations in future ground motion studies for the Port.

### 7.1 ADJUSTMENT FOR NEAR-FAULT RUPTURING EFFECTS

In addition to the issues that contributed to unintended variations and inconsistencies in ground motion criteria discussed in previous sections, and based on our past experience on several past seismic design projects (including past Caltrans seismic retrofit and bridge replacement projects, the San Francisco International Airport Expansion Project, and other major projects), we have found that large differences in the UHS (especially for the CLE spectrum) are often due to different assumptions and treatments in the so-called near-fault forward-rupturing effects on the ground motion hazard. Figure 7-1 shows the potential period-dependent adjustment factors for the most adverse assumption for near-fault fault rupturing effects. As can be observed in the figure, the effect can be very significant and would have a profound influence in the result of the UHS solution, especially for longer return periods.

Technical development in this area is in a state of flux. For example, during the San Francisco-Oakland Bay Bridge East Span Project, critical review on this issue led to the need to change the Somerville et al. (1997) near-fault directivity fault-rupturing model, which had a profound influence on the resultant recommended ground motion criteria. For some time, such updates were only documented in a draft EMI Bay Bridge Report (EMI, 1998) that was not accessible to other consultants. Since then, the modified directivity model has been documented in the Abrahamson (2000) publication. This modification might not be widely known by all consultants. Also, there is a great deal of undocumented details regarding how to develop the degree of near fault rupture directivity adjustment (i.e. the  $x \cdot \cos \theta$  parameter) for various return periods. All these issues have not been well documented and potentially contribute to variations among different probabilistic analyses conducted by various consultants. It is conceivable that mistakes are made in the course of implementation of this near fault directivity effect in a probabilistic hazard analysis. This is the reason why it is important to involve experts such as Dr. Abrahamson (a well-known expert in probabilistic hazard analysis theories and also a key co-author in the near-fault directivity attenuation model) in conducting the probabilistic hazard analyses.

### 7.2 SITE RESPONSE PROCEDURES

We have outlined our site response analysis procedure suggested for future site evaluations. Major issues include the following as discussed previously:

- The need to input the generated firm-ground motion appropriately and avoid to model an overly deep soil column that has a tendency to exaggerate site response effects. In

conducting site response analyses, one should first recognize the benchmark site soil condition compatible to the basis of the attenuation model used for the probabilistic seismic hazard analyses. The firm-ground attenuation models (e.g. the Abrahamson and Silva (1997), Campbell (1997), Sadigh et al. (1997), and Boore et al. (1997) attenuation models) commonly used by consultants supporting POLB's projects are all based on regression analysis of ground surface strong motion records at typical alluvial sites within the Los Angeles Basin.

Based on shear wave velocity profiles collected following the Northridge earthquake at various strong motion stations at California (ROSRINE, 2001), the common opinion among seismologists appears to be that typical firm-ground sites have an average shear wave velocity  $\bar{v}_{s,30}$  over the upper 100-ft depth of about 1,000 ft/sec. Based on our review of available shear wave velocity profiles at POLB sites, we established four generalized soil profiles as shown in Figure 2-7 representing ranges of soil conditions typical for the POLB. Following a rigorous interpretation of a  $\bar{v}_{s,30}$  of 1,000 ft/sec definition, input time history records scaled to the reference firm-ground conditions should be used as input at a depth no deeper than about 80 ft. Typical soil profiles at POLB sites have an average shear wave velocity value exceeding about 700 ft/sec within 80-ft depth, increasing to over about 1,200 ft/sec in the next 100-ft depth with a  $\bar{v}_{s,30}$  approximating the reference 1,000 ft/sec value. In the past, it appears that consultants typically would input the firm-ground input motions from PSHA solutions at the Gaspar formation below 120-ft depth. Based on a more rigorous review of site response solutions, we concluded that such past practice might have resulted in an exaggeration of the site response amplification effect for the long-period range above 0.7 sec.

- In the course of conducting our site response analyses, we also observed that the conventional site response procedure in treating the elastic halfspace beneath the soil column needs to be modified for the deep soil condition typically encountered at the Port. The site response analysis procedure, originally developed by researchers at the University of California at Berkeley, was originally intended to address soil conditions found in the San Francisco Bay Area where bedrock with a shear wave velocity of about 2,500 ft/sec is typically found at 200 to 300-ft depth. Therefore, it is common to conduct probabilistic seismic hazard analysis using bedrock attenuation models to establish the reference target design spectrum that is then used for generating input time histories for site response analyses. As a result, a typical site response analysis conducted for a Bay Area site would have two objectives: (1) to account for the site-specific soil condition such as for a Bay Mud site, and (2) to account for the impedance contrast at the soil-rock interface.

Typically, the classical site response analysis involves conducting analysis of a soil column to bedrock that has a significant stiffness (impedance) contrast. The soil column is characterized by the measured shear wave velocity profile which will be modified in an iterative equivalent-linear soil modulus adjustment ratio for each layer to account for the nonlinear behavior of soils. Beneath the soil column, a transmitting boundary concept is used in modeling an infinite elastic halfspace at the interface between the soil column and the underlying elastic halfspace. The impedance contrast (the change in soil and bedrock

stiffness) at this transmitting boundary is taken into account implicitly in the conventional site response analysis.

However, soil conditions in the POLB area and many other Los Angeles Basin sites differ from those around the Bay Area in regards to the impedance contrast issue. First, bedrock is typically encountered at large depths. In most cases, the depth to bedrock is not known or cannot be verified by conventional boring programs by geotechnical consultants. For example, during the Vincent Thomas Bridge seismic retrofit design project in the Port of Los Angeles, Caltrans drilled two very deep boreholes, at a great expense, to locate the depth to bedrock. However, that effort had to be abandoned by terminating the boreholes at about 600 ft due to budget and equipment limitations. At the termination depth, the measured shear wave velocity was only about 1,500 ft/sec, well below the 2,500 ft/sec value considered appropriate for bedrock. Difficulty in locating the depth to bedrock and also concern over conducting site response analyses using overly deep soil columns for the Los Angeles Basin sites led to most consultants in Southern California to conduct probabilistic seismic hazard analyses based on firm-ground attenuations rather than based on bedrock attenuations.

In summary, the soil conditions at the POLB should be characterized as a deep soil site where there is no apparent boundary of significant soil stiffness (impedance) contrast between two adjacent soil layers such as the soil-rock interface typically encountered in the San Francisco Bay Area. Hence, the key objective for a site response analysis at the POLB would be to reconcile the somewhat softer surficial soil condition as compared to those typical firm-ground sites found within the Los Angeles Basin. We concluded that a slight change in the procedure in modeling the elastic halfspace beneath the soil column model would give better site response solutions to the deep soil condition at the POLB. We also found that for site response analysis of modeling a relatively short soil column (less than about 80 ft in depth), the cyclic shear strain at the base of the soil column model would remain relatively high (say larger than 0.2% cyclic strain, or 0.5% peak strain). The resultant iterated equivalent-linear shear modulus ratio to adjust the low-strain shear wave velocity profile implicit in a site response solution would degrade the soil layer at the column base to less than 0.5 of the initial low-strain shear modulus basis. This would cause a significant artificial impedance contrast in the site response model at the boundary of base of soil column-underlying halfspace beneath the transmitting boundary of stiffness ratio of larger than at least 2.0.

Naturally, such an impedance contrast is only introduced artificially in the site response model unintentionally whereas there is no true impedance contrast dictated by the site soil condition at the POLB. We found that such an artificial impedance contrast introduces appreciable artificial site amplification at the important structure period range between 0.5 and 1.0 sec. To avoid such an artificial impedance contrast associated with the deep alluvial deposit condition at the POLB, we found that the halfspace shear wave velocity value beneath the transmitting boundary needs to be adjusted manually in an iterative manner. We recommend that after a site response run, the equivalent-linear shear modulus ratio must be extracted at the base of the soil column and then this ratio applied

to soften the shear modulus (velocity) value of the underlying elastic halfspace to avoid the undesirable effect from an impedance contrast on the site response solution.

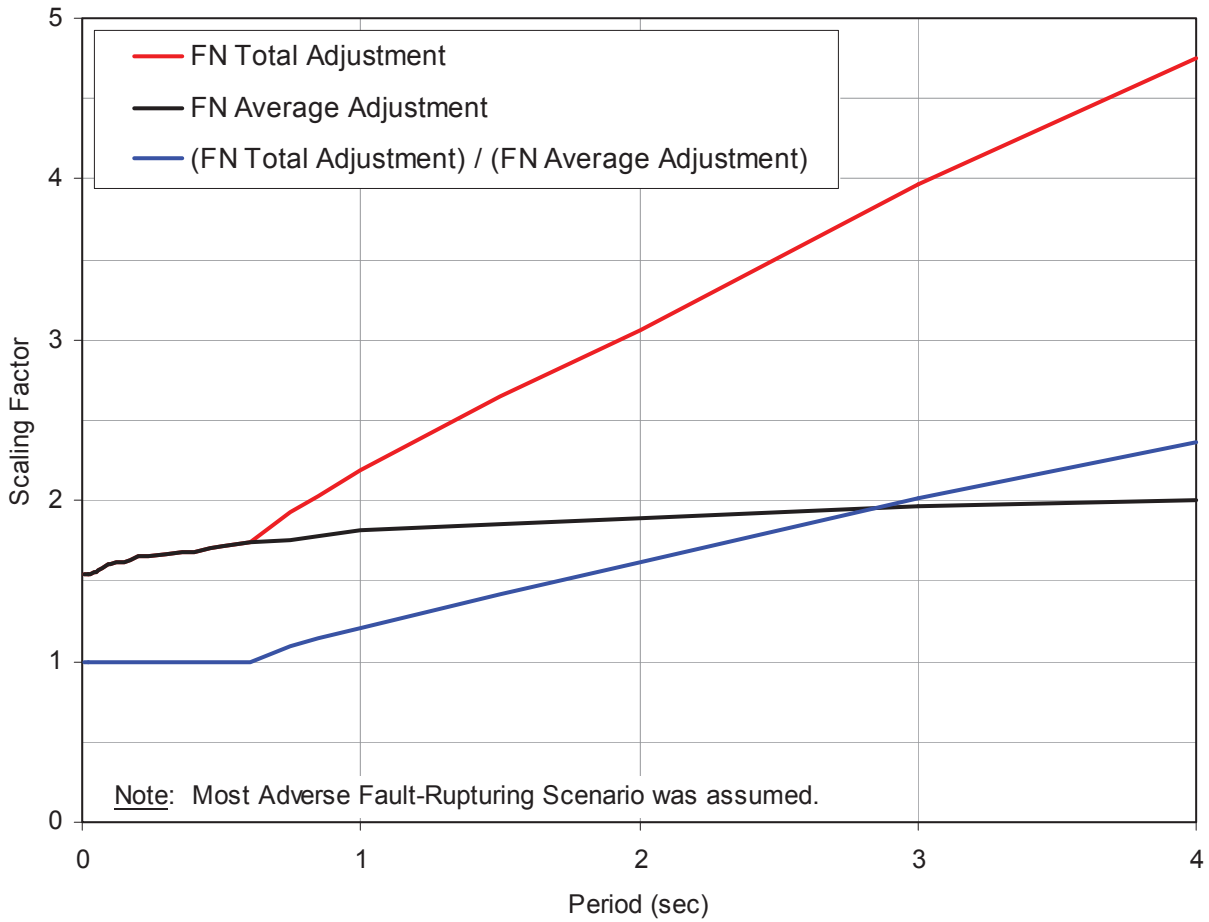


Figure 7-1. Period-Dependent Adjustment Factors for Near-Fault Fault-Rupturing Effects



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# **APPENDIX A**

## **Geology, Seismicity and Fault Details**

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# APPENDIX A

## GEOLOGY, SEISMOLOGY, AND FAULT DETAILS

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## APPENDIX A

# GEOLOGY, SEISMICITY AND FAULT DETAILS

### A.1 REGIONAL GEOLOGY AND SEISMICITY DETAILS

#### A.1.1 Regional Physiography

The POLB area is in the Los Angeles Basin near the juncture of two major physiographic/geologic provinces, the Peninsular Ranges to the south and the Western Transverse Ranges to the north. In very simple terms the Peninsular Ranges comprise a series of northwest-southeast trending ranges and valleys whereas the Transverse Ranges comprise east-west trending ranges and valleys. Both of these provinces extend into the offshore area and include the Santa Barbara Basin and the Continental Borderland. In both of the provinces the valleys and ranges are separated by major fault zones; these faults trend subparallel to the ranges, that is, northwest-southeast within the Peninsular Ranges and east-west in the Transverse Ranges. The area between the two provinces comprises the Santa Monica Bay, Los Angeles, San Gabriel, and Upper Santa Ana River Valley basins which contain a complex mixture of faults and folds with orientations typical of both provinces.

The POLB is within the coastal area of the Los Angeles Basin which is a large low-lying coastal plain bordered by the Santa Monica Mountains on the north, the Repetto and Puente Hills on the northeast, the Santa Ana Mountains on the east, and the San Joaquin Hills on the south (refer to Figure 2-1). The southwestern margin of the basin is open to the Pacific Ocean except for one prominent hill, the Palos Verdes Hills or Peninsula. The offshore area to the southwest is characterized by a broad, relatively shallow, shelf or bench that extends about 5 to 15 km where it drops off steeply to deep ocean basins, the Santa Monica Basin north of the Palos Verdes Hills and the San Pedro Basin south of the hills. The offshore area is characterized by a series of islands and submarine shoal areas, or banks, separated by deep basins, and commonly referred to as the Southern California Continental Borderland.

The floor of the Los Angeles Basin is a relatively flat surface rising gently from sea level along the coastline to the surrounding mountains which then rise abruptly to a few thousand feet above the plain. The flat basin floor is interrupted in a few localities by small hills such as the northwesterly alignment of hills and mesas extending from the Newport Beach area on the south to the Beverly Hills area on the north. This northwest-trending alignment of hills divides the basin floor into two major plains, the Downey-Tustin Plain northeast of the hills and the Torrance Plain on the southwest.

The inland margins of the Los Angeles Basin are commonly elevated somewhat above the general level of the basin floor within an apron of higher elevation surfaces such as the Santa Monica Plain, La Brea Plain, Montebello Plain, Santa Fe Springs Plain, and the Coyote Hills (see Figure 2-1). These elevated plains generally comprise slightly dissected older alluvial surfaces.

The major drainages in the Los Angeles Basin enter the basin through narrow passes or gaps in the hills and then flow southerly to the ocean. The major drainages are the Los Angeles River, the San Gabriel River, and the Santa Ana River. Other local significant drainages are Rio Hondo, Coyote Creek, Ballona Creek, Compton Creek, and San Diego Creek. The Port of Long Beach lies within the coastal delta of the Los Angeles and San Gabriel rivers, but this drainage system has been highly modified by channelization of the streams within a network of concrete and rip-rap lined aqueducts.

### **A.1.2 Regional Stratigraphy**

The floor of the Los Angeles Basin, the marginal plains, and the adjacent submarine shelf are directly underlain by Quaternary-age sandy sediments with local silts, clays, and gravels. These generally can be subdivided into nonindurated, loose Holocene-age sediments that cover the bulk of the basin and shelf, and Pleistocene-age materials which are exposed only locally within some of the uplifts within the Newport-Inglewood Structural Zone and the marginal plains.

Onshore, the uppermost Pleistocene materials are generally non-marine deposits referred to as the Lakewood Formation which is on the order of 125,000 to 500,000 years old (California Department of Water Resources, 1961). These late- to middle-Pleistocene sediments overlie older early Pleistocene marine sediments referred to as the San Pedro Formation which is more than 500,000 years old. The San Pedro Formation overlies marine Tertiary-age (> 2 million years) sediments and sedimentary rocks. These include the Pico, Repetto, Fernando, Puente, and Monterey formations. The Tertiary-age sediments and rocks, in turn, overlie Mesozoic-age (~100 million years) crystalline basement rocks at depths ranging from about 1,500 to 3,000 m west of the Newport-Inglewood Structural Zone (NISZ) to as much as 10,000 m in the deepest part of the central basin east of the NISZ (Yerkes et al., 1965). The basement west of the NISZ is primarily metamorphic rock (schist) whereas the basement to the east includes both metamorphic and igneous rocks.

### **A.1.3 Regional Geologic Structure**

The present-day tectonic stress field is one of north-northeasterly compression. This is seen in the geologic structure, and is indicated by earthquake focal-mechanism solutions and by geodetic measurements. These data suggest compression rates of between 5 and 9 mm/yr across the greater Los Angeles area.

Except for a few marginal zones, the geologic structure of the Los Angeles basin is characterized by relatively flat-lying, late-Quaternary strata overlying slightly folded early-Pleistocene strata, which in turn overlie gently to moderately dipping Pliocene strata of the Fernando, Pico, and Repetto formations and the Miocene Puente/Monterey Formation.

The central part of the basin is a deep trough that rises rather abruptly due to faulting and folding. The principal zones faulting are the NISZ-Los Alamitos system on the west and the Puente Hills fault system (Los Angeles-Santa Fe Springs-Coyote Hills-Peralta Hills faults) on the east.

Except for the Newport-Inglewood Structural Zone, most surface geological faults such as the Santa Monica, Hollywood, and Whittier faults occur along the basin margins. In addition to

these known surface faults, the Los Angeles region is underlain by subsurface thrust and reverse faults (commonly referred to as "blind" faults and shown on Figure 2-1 as dotted lines). These are poorly understood features with poorly known locations and orientations. Most of the known subsurface faults underlie the higher-standing plains along the inland margin of the basin, but others have been proposed (for example, the San Joaquin Hills thrust fault). Most large earthquakes associated with these subsurface features are most likely to originate at depths between 10 and 15 km. The 1987 Whittier earthquake occurred on one of these buried faults that dips northerly under the Repetto Hills and San Gabriel Basin northeast of the site.

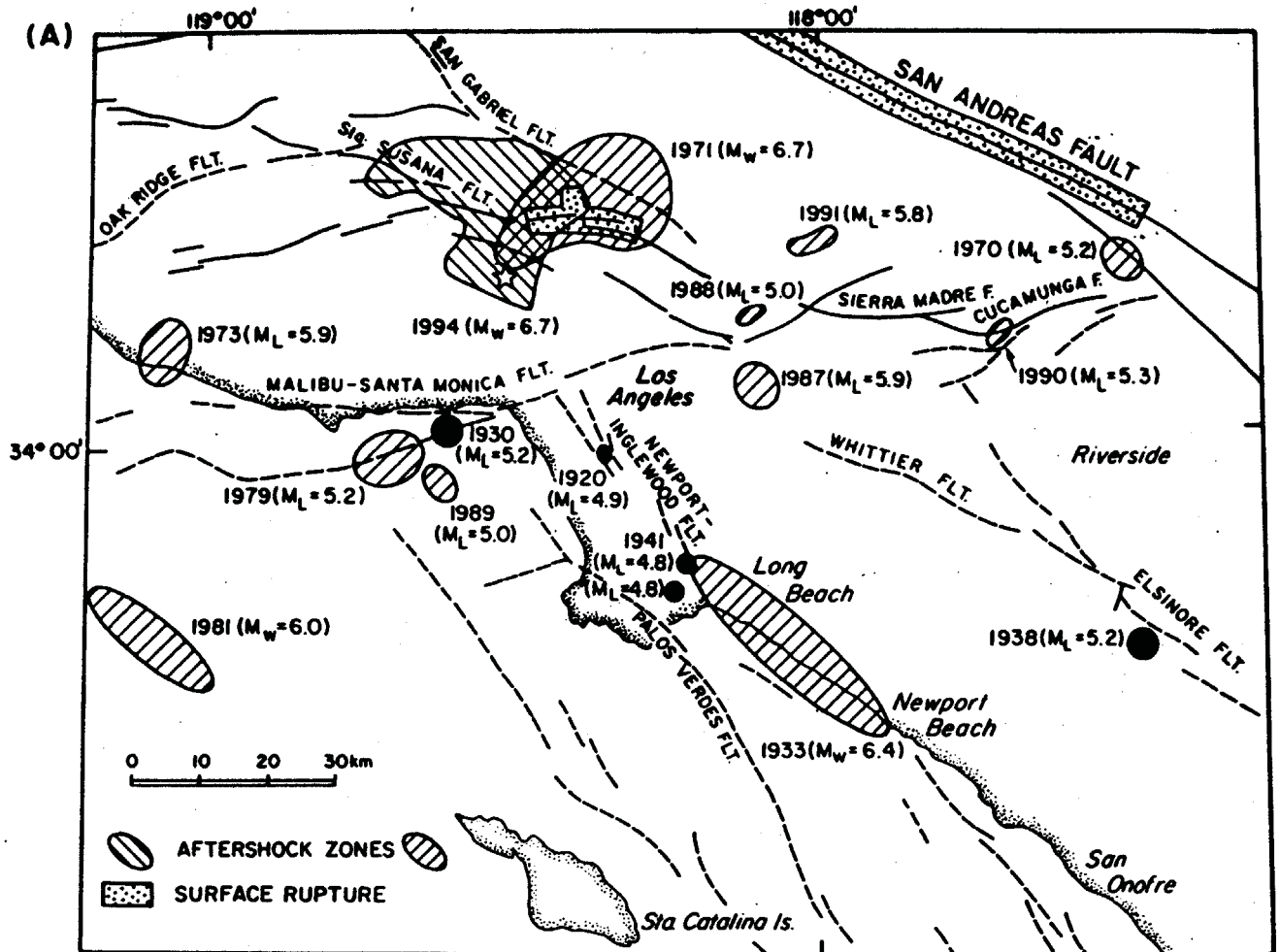
The Los Angeles region has a complicated history. Within much of the area, the basement is buried beneath sedimentary and volcanic rocks no older than Miocene. Apparently, basement rocks in the region were unroofed and exposed across wide areas when the ancient Farallon oceanic plate, which was being subducted from the west, stopped subducting below the area (Atwater and Stock, 1998). Upon cessation of subduction, regional rifting and strike-slip faulting occurred oblique to the continental margin leading to clockwise rotation of the Transverse Ranges (Luyendyk et al., 1980) involving the existing faults. In late Pliocene and Quaternary time (the past 4 million years), faults that previously formed by extension were involved in regional crustal compression (Wright 1991; Crouch and Suppe, 1993). During the transition from extension to compression, some middle Miocene normal faults were reactivated as reverse and strike-slip faults (Rivero et al., 2000). Blind thrust faults and folds may have begun to form about this time. In the project area, evidence for the Pliocene onset of the compressive deformation comes from the large Wilmington anticline which deforms rocks deposited since lower Pliocene time. The folding and faulting that formed this anticline apparently was largely completed before the end of the late Pliocene (Truex, 1974).

The present tectonic regime appears to have been in place since middle Pleistocene time and the present-day configuration of the Los Angeles basin would have been recognizable about 200,000 to 300,000 years ago, although the sea may have still occasionally migrated into some low-lying coastal channels (Ponti, 1989). The bulk of tectonic activity in the Long Beach region during Quaternary time appears to have occurred along the Palos Verdes fault and the NISZ, both of which form the most prominent uplifts in the Los Angeles Basin. The Signal Hill uplift within the NISZ, for example, formed in the past couple hundred thousand years (Ponti and Lajoie, 1992). If these deformation characteristics can be applied basin wide, the greatest tectonic activity within late Pleistocene time has occurred primarily in proximity to the major surface faults such as the Palos Verdes, Malibu-Santa Monica-Hollywood, Newport-Inglewood, Whittier, and Sierra Madre faults. The subsurface thrust faults within the region have not been active enough to create similar prominent uplifts and only a few (e.g. Santa Fe Springs) even have subtle recognizable surface expression.

#### **A.1.4 Regional Seismicity**

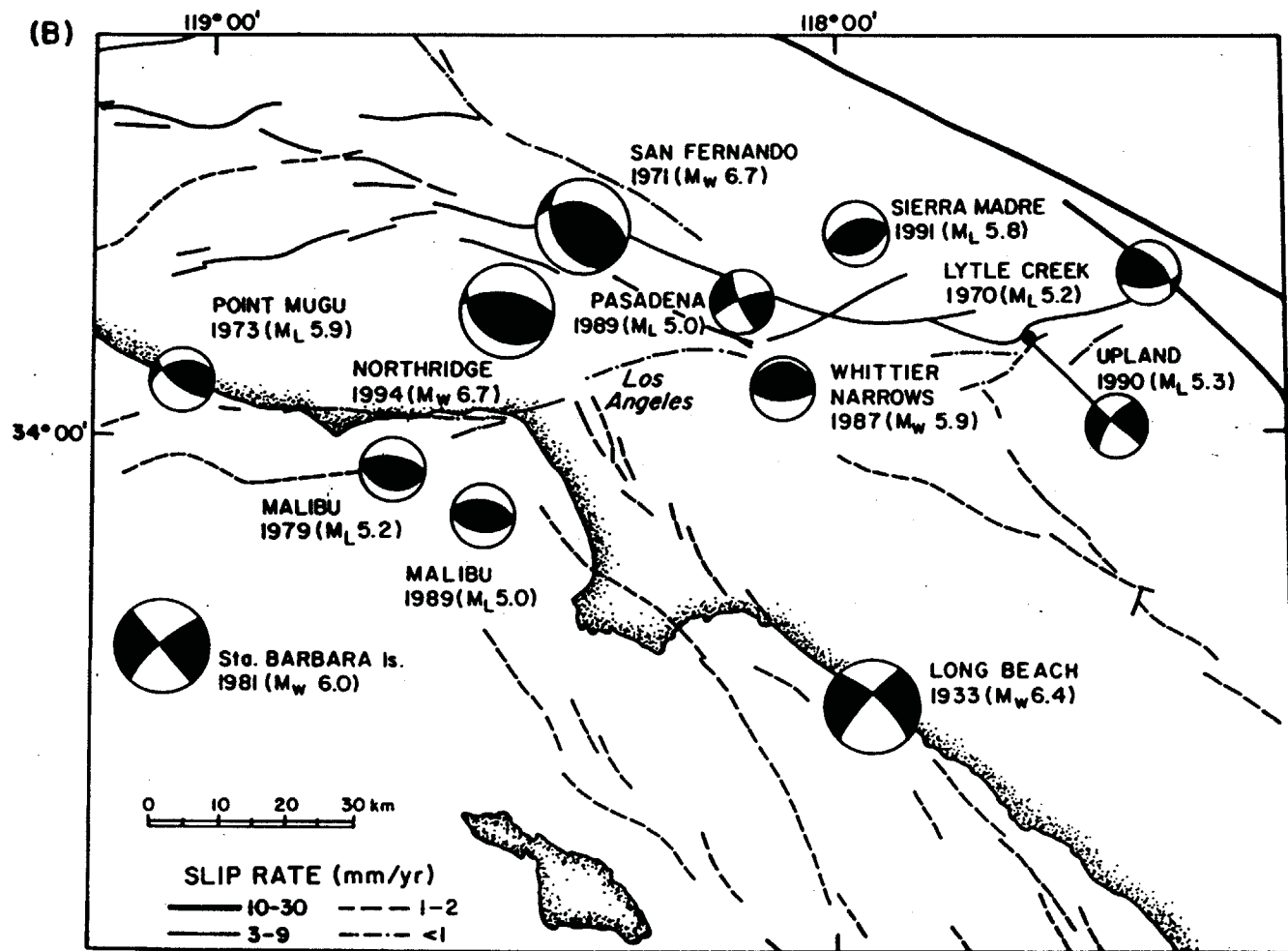
The southern California area is seismically active as the seismicity map shown in Figure 2-2 would suggest. Additional seismicity information is provided in Figure A-1 and Figure A-2, indicating some of the notable earthquakes in the Los Angeles Basin and their focal mechanisms, respectively. Seismicity in the Los Angeles Basin does not clearly correlate to surface faults. There is no concentration or clustering of earthquakes in the site region except perhaps along the

NISZ where a series of aftershocks from the 1933 event are located. Ward (1994) suggested that as much as 40% of the tectonic strain in southern California is not released on known faults.



Note: Cross-hatched areas indicate aftershock zones (after Hauksson, 1995)

Figure A-1. Significant Earthquakes in the Los Angeles Area



(after Hauksson, 1995)

**Figure A-2. Focal Mechanisms for Significant Earthquakes Since 1993**

The largest historical earthquake within the Los Angeles Basin was the 1933 Long Beach earthquake of Moment Magnitude  $M_W$  6.4 (Local Magnitude  $M_L$  6.3). The 1971 San Fernando ( $M_L$  6.4,  $M_W$  6.7) earthquake occurred outside of the basin along the northern margin of the San Fernando Valley within a zone of mapped surface faults. The more-recent 1987 Whittier earthquake ( $M_L$  5.9,  $M_W$  5.9) and the 1994 Northridge ( $M_L$  6.4,  $M_W$  6.7) earthquakes occurred under the San Gabriel Valley and the San Fernando Valley, respectively, but were not associated with surface faults.

The Long Beach earthquake is generally believed to have been associated with the Newport-Inglewood Structural Zone (Benioff, 1938). This association was based on abundant ground failures along the trend but no unequivocal surface rupture was identified. Hauksson and Gross (1991) reevaluated the seismic history and relocated the 1933 earthquake to a depth of about 10 km below the Huntington Beach-Newport Beach city boundary.

Hauksson (1987, 1990) analyzed the historical seismicity of the Los Angeles Basin. Although several older events were included, the principal time frame of the earthquake record studied was from 1977 to 1989, only about 12 years. This is a short time relative to the geologic time scales that control crustal tectonic activity, and thus the results of the study must be used cautiously. Also, there were few moderate and no large events in this record. History has shown repeatedly that small earthquakes are not necessarily indicative of large events and/or of the principal tectonic regime. Of 244 earthquake focal mechanisms, 59% were predominantly strike-slip, 32% were reverse, and the rest were normal-fault mechanisms. All of the events were widely distributed and intermixed, and patterns are ambiguous. A large proportion of the strike-slip events occurred along the NISZ but the distribution is generally loosely scattered. More of the reverse mechanisms occurred north of the latitude of Palos Verdes Hills than to the south but like the strike-slip events the pattern is loose and typified by widely scattered events. Most of the normal-fault mechanisms occurred in the offshore area, but several also occur along the NISZ.

The average stress field indicated by the data is compression with a north-northeast orientation. Combined with the limited time span of the record, the weak patterns are not very revealing other than that earthquakes are quite intermixed, i.e. there are few areas where one type of mechanism clearly dominates. However, this in itself is an important result because it illustrates the complexity of local tectonics. All in all, the focal mechanisms are very compatible with the geologic data which indicate a mixture of predominantly strike-slip and reverse fault structures. Considering the nature of faulting one should not be surprised to see strike-slip and reverse mechanisms in close proximity. The NISZ, for example, comprises numerous branches which form upward branching configurations referred to as flower structures. Lateral slip in a transpressional tectonic environment along the main central shear zone of the NISZ can be accompanied by small reverse displacements along flank faults. The NI faults are commonly en echelon, suggesting variable slip orientations. Like the mixture of strike-slip and reverse events along the NISZ, the complex intersection of the northwest-trending folds and faults within the Santa Monica-Hollywood fault system along the northern margin of the Basin should yield both strike-slip and reverse focal mechanisms. Also, it should be pointed out that many of the focal mechanisms are not pure strike-slip or reverse; many of them have significant vertical components.

In overview, both the earthquakes and the geologic structures in the Los Angeles Basin appear to characterize tectonic environments whereby the northernmost part of the Basin, adjacent to and including the Santa Monica Mountains, is primarily a contractional tectonic regime (thrust and reverse faulting); the middle part of the Basin (to about a line connecting the north side of the Palos Verdes Hills-Signal Hill-Peralta Hills is a mixture of contractional and transcurrent (transpressional) structures, and the southern part of the Basin is primarily a transcurrent regime (strike-slip faulting).

Without a history of repeated large earthquakes within the basin, it is difficult to characterize the maximum earthquake potential. Neither the 1971 San Fernando, the 1987 Whittier, nor the 1994 Northridge earthquakes occurred within the Los Angeles Basin. However, they occurred within the same basic compressional tectonic regime and thus are probably representative of the size of earthquakes likely to occur on the larger subsurface faults within the basin.

## A.2 FAULT DETAILS

The following sections describe the principal active faults in the Los Angeles region that might contribute to ground shaking in the POLB area. Locations of these faults are shown on Figure 2-1. This information is given from a regional perspective for understanding the nature of the faults, and provides the basis for the parameters used in the probabilistic seismic hazard analysis as discussed in Appendix B and summarized in Section 3.

### A.2.1 Palos Verdes Fault

The Palos Verdes fault extends through the Port of Los Angeles from the east side of the Palos Verdes Peninsula southeasterly to the Lasuen Knoll area offshore and northwesterly into the Santa Monica Bay, for a total length of about 100 km (Figure 2-1).

The southern part of the Palos Verdes fault is well defined by seismic-reflection data which documents seafloor and shallow subsurface disruption of young sediments. The Palos Verdes fault extends southeasterly (about S33°E) from the Los Angeles harbor area, across the San Pedro shelf, to the Lasuen Knoll area (Vedder et al, 1986; Fisher et al, 2004). The nature of the fault changes markedly along strike southeastward across the San Pedro shelf and slope (Fisher et al, 2004). Under the north part of the San Pedro shelf, the fault zone includes several strands, with the main strand dipping west. To the southeast, under the slope, the main fault strand exhibits normal separation and mostly dips east. Farther to the southeast near Lasuen Knoll, the fault zone locally dips at a low angle, but elsewhere near this knoll, the fault dips steeply. Fisher et al. (2004) explain the observed structural variations as the result of changes in strike and fault geometry along a master right-lateral strike-slip fault at depth.

Vertical fault separation of the schist basement rocks is about 350 m in the area south of the offshore Beta oil field (Fischer et al., 1987) and about 600 m in the Beta field (Wright, 1991). This basement complex is buried beneath sedimentary rocks no older than Miocene age (Fisher et al, 2004).

The Palos Verdes fault is difficult to trace southeast of Lasuen Knoll. This is partly due to poor geophysical coverage but also may be because motion is transferred onto several fault splays southeast of the knoll (Fisher, et al., 2004); based on the sharp escarpment along the west side of Lasuen Knoll, the main fault appears to be west of Lasuen Knoll. Lasuen Knoll, like the Palos Verdes Hills and most of the other islands and submarine banks in the Southern California Continental Borderland, is composed of Tertiary-age rocks which have been uplifted by faulting and folding. The extension of faulting south of Lasuen Knoll trends toward the Coronado Banks fault zone (Vedder et al., 1986) which has led some (e.g. Rockwell et al., 1987) to conclude that the faults are interconnected. However faults to the south of Lasuen Knoll are discontinuous, and the sense of separation is opposite of that on the Palos Verdes fault north of Lasuen Knoll; if they are interconnected, the connection is indirect.

The Palos Verdes fault trends through Los Angeles Harbor to the east side of the Palos Verdes Peninsula. Onshore, the Palos Verdes fault has a northwesterly trend along the northeast margin of the peninsula forming a restraining bend in the region just north of the POLA. Although there are no unequivocal surface exposures of the Palos Verdes fault, it is recognized in oil wells at

shallow depths as sheared zones, steeply dipping discordant beds, and old-over-younger rocks. The fault appears to dip southwesterly under the Palos Verdes Hills at a relatively steep angle. Woodring et al. (1946) and Zielbauer et al. (1962) show the Palos Verdes fault to be generally coincident with the topographic break along the northern and northeast margin of the Palos Verdes Hills but there are many interpretations that suggest locations upslope within the Palos Verdes Hills. Synthesis of oil-well, geomorphic, fault trenches, and seismic-reflection data indicate that the fault dips about 65° to 70° to the southwest under the Palos Verdes Hills. Recent trenching (2003-2004) of upslope lineaments in the Chandler quarry and adjacent golf course area did not reveal any significant faulting supporting the interpretation that the fault lies near the topographic base of the hills. Other oil wells, geomorphology, and surface geological mapping to the northwest indicate that the Palos Verdes fault continues northwesterly along the northeast margin of the Palos Verdes Hills toward the Redondo Beach area.

In Santa Monica Bay to the north of Palos Verdes, the Palos Verdes fault is difficult to locate; a fan-shaped array of subsurface, northwesterly trending faults is generally considered to represent a continuation of the Palos Verdes fault (Figure 2-1). These features have a much lesser rate of activity than the southern Palos Verdes fault. Nardin and Henyey (1978), Clark et al. (1987), and Fisher et al. (2004) found little evidence of faults displacing strata any younger than Pliocene, and thus Quaternary activity on the northern Palos Verdes fault is doubtful. Seismic-reflection profiles by Fisher et al. (2003) across the area revealed undeformed sediment across the projected location of the fault. There are several other faults in Santa Monica Bay, (for example, the Dume, San Pedro Basin, San Pedro Escarpment faults), which by comparison exhibit more-abundant and more-prominent evidence of youthful fault activity indicating that they may be more active than the Palos Verdes fault. Nardin and Henyey (1978) proposed that the east-west trending Redondo Canyon represents a fault zone that may separate the southern active Palos Verdes fault from the Santa Monica Bay part of the fault.

The Palos Verdes fault is predominantly a strike-slip fault but has a small vertical component (about 10% to 15%). The slip rate of the Palos Verdes fault is based primarily on the geophysical and geological studies in the outer harbor of the Port of Los Angeles by McNeilan et al. (1996). McNeilan et al. estimated a long term horizontal slip rate of between 2.0 and 3.5 mm/yr with a range of about 2.3 to 3.0 mm/yr for the middle- to late- Holocene time period. The rate preferred by the geological community has, by default, conservatively been assumed to be the 3.0 mm/yr rate. Such a slip rate makes the Palos Verdes fault one of the most active faults in the Los Angeles region. However, other geophysical surveys in the Los Angeles Harbor area (e.g. Clarke and Kennedy, 1998) could not verify this slip rate so it is uncertain whether the rate is valid for the entire fault zone or whether it is a local rate due to some local slip enhancement. A slip rate of 3.0 mm/yr ( $\pm 1$ mm) is the rate used by the California Geological Survey and the U.S. Geological Survey and therefore is the preferred rate for the current study.

There are virtually no direct data to constrain the recurrence interval for large earthquakes on the Palos Verdes fault. There have been no significant earthquakes on the fault since arrival of the Franciscan missionaries in the 1700s. Using the empirical data of Wells and Coppersmith (1994) to indirectly make judgments on how long it would take to store up enough strain to generate a magnitude 6.8 to 7.4 earthquake, it appears that recurrence intervals for such earthquakes on the Palos Verdes fault would range from a few hundred to a few thousand years. For example, fault



rupture scenarios evaluated by McNeilan et al. ranged from 180 to 630 years for a M6.8 event, 400 to 440 years for a M7.1 event, 1,000-1,100 years for a M7.2 event, and 830 to 1,820 years for a M7.4 event (these numbers are quoted from McNeilan et al., 1996). Other scenarios may be just as likely and would yield similar ranges. Previous seismic hazard analyses for the Port of Los Angeles and the Vincent Thomas bridge (Earth Mechanics, Inc., 1993, 1995, 2001) used recurrence intervals in the middle of the range (800-900 years).

The maximum earthquake is also highly uncertain for the reasons discussed above. Because the segment in Santa Monica Bay does not show any evidence of Quaternary faulting it is not likely to be involved in faulting with the southern part. Therefore, the maximum earthquake should be based on a fault length of about 60 to 70 km or on Palos Verdes Peninsula segment and the offshore San Pedro Shelf segment. The magnitudes evaluated for the current study are presented in see Appendix B).

### **A.2.2 Newport-Inglewood Structural Zone**

The Newport-Inglewood Structural Zone (NISZ) consists of the northwest-southeast trending series of faults and folds forming an alignment of hills in the western Los Angeles Basin extending from the Baldwin Hills on the north to Newport Mesa on the south ( Figure 2-1). The fault seems to have originated in about late Miocene time but based on relative stratigraphic thickness of bedding across the zone, the greatest activity seems to have been post Pliocene indicating the fault is quite young.

The NISZ comprises several individual faults and branch faults (refer to Figure 2-1, Figure 2-3, Figure 2-4, and Figure 2-5), few of which have good surface expression as actual fault scarps. A few somewhat linear “scarps” and lineaments can be seen on old aerial photographs but urban development has essentially obscured most natural surface evidence except for the series of young hills and mesas along the alignment. The faults are best known primarily from oil-well data. Faulting is relatively linear and narrow along the central part of the zone in the Long Beach-Seal Beach area. To the north of Dominguez Hill, the faults are shorter, less continuous, and exhibit a left-stepping en echelon arrangement with several folds between fault branches. In the south near Costa Mesa and Newport Beach, the NISZ widens to about 5 or 6 kilometers where it includes several subparallel faults such as the Bolsa, Fairview, and Pelican Hill faults. How all of these subparallel faults are related is not clear. The main fault is believed to be the South Branch (Freeman et al., 1992).

The NISZ extends offshore to about the Dana Point area. Farther offshore to the south, the fault is believed to connect via the Offshore Zone of Deformation near San Onofre to the Rose Canyon fault in the San Diego region forming a major structural trend commonly referred to as the Santa Monica-Baja Zone of Deformation (SMB).

The maximum earthquake used for the NISZ in local geotechnical investigations has generally been magnitude 7.0. This may be relatively small for a feature as long as the SMB zone but the magnitude is based on the concept that the zone consists of shorter discontinuous faults, or segments, that behave independently. The fault was the source of the 1993 Long Beach earthquake of magnitude 6.3, but as with the Palos Verdes fault, the history of earthquakes on the NISZ is incomplete so it is difficult to estimate a maximum earthquake. Empirical fault-

length/earthquake-magnitude relations (Wells and Coppersmith, 1994) suggest an MCE of about M 7.0. The range of magnitudes used in this evaluation is discussed in Appendix B.

The recurrence interval for the maximum earthquake on the NISZ is very long, on the order of a thousand years or more (Schell, 1991; Freeman et al., 1992; Shlemon et al., 1995; Grant et al., 1997). Grant et al. (1997) conducted a detailed cone-penetrometer investigation on the fault in the Huntington Beach area and postulated three to five surface ruptures in Holocene time. In the Newport area, Shlemon et al. (1995) interpreted five surface ruptures in Holocene time. These interpretations suggest average recurrence intervals of about 2,000 to 3,500 years per event; Grant et al. estimated that at least two of the events they interpreted occurred about 1200 years apart indicating irregular inter-event time intervals.

The rate of fault slip is poorly known but seems to be very slow. Although there is quite a wide range of slip rates proposed by various published sources, most of them are of uncertain validity because they are based on short-term, local, vertical components rather than regional horizontal slip. Grant et al. (1997) inferred a minimum rate of 0.34 to 0.55 mm/yr but suspected the actual rate might be higher. Shlemon et al. estimated a rate of 1.5 to 2.5 mm/yr. The southern segment of the SMB system comprising the Rose Canyon fault in the San Diego area has a slip rate of about 1.1 to 1.5 mm/yr (Lindvall and Rockwell, 1995). The northern part of the NISZ is commonly considered to have a much lower rate, on the order of 0.1 mm/yr but good data to support such a rate is lacking. Most seismic hazard studies have used a long-term rate of 0.5 mm/yr based on offset of Pliocene fold structures and strata (Schell, 1991; Freeman et al., 1992). However, most of the deformation within the NISZ seems to have occurred within Quaternary time so the rate during more-recent times may differ from the long-term rate. Recent seismic hazard models by the California Geological Survey (2003) use a slip rate of about 1.0 mm/yr. The current study considered a range of slip rates from 0.5 to 1.5 mm/yr, with 1.0 mm/yr being the preferred estimate (see Appendix B).

### **A.2.3 Cabrillo Fault**

The Cabrillo fault forms a prominent northeast facing scarp in the 100,000 year-old terrace in the San Pedro-Point Fermin area (refer to Figure 2-1). The fault dips about 50° to 70° easterly with a vertical displacement of about 100-200 ft (Woodring et al., 1946). The fault trends northwesterly inland for about 7 km (Woodring et al., 1946; Dibblee, 1999). Southerly from Cabrillo Beach, the fault extends offshore for a distance of about 11 km where it appears to merge with the Palos Verdes fault (Vedder et al., 1986; Fischer et al., 1987). The offshore fault is shown as a zone of disruption up to 500 m wide.

Offshore activity along the fault appears to be of Holocene age as indicated by south-facing scarps 1.2 m high, and two or possibly three positive topographic sea-floor anomalies along its trend (Fischer et al., 1987). These topographic anomalies are within sediments estimated to be about 5,000-6,000 years old.

The maximum magnitude and slip rate are difficult to estimate due to lack of data. The fault is considered to be predominantly a strike-slip fault due to its association with the Palos Verdes fault, but may also have a normal component of displacement. Based on empirical fault-length/earthquake-magnitude relationships (Wells and Coppersmith, 1994) the fault could be

capable of about an  $M \sim 6.25$  to 6.5 earthquake. Fischer et al. (1987) estimated a vertical slip rate of 0.4 to 0.7 mm/yr which is greater than the Palos Verdes fault estimates and therefore is questionable as a long-term rate. Most studies suggest that the Cabrillo fault is a minor feature and Ward and Valensise (1994) estimated a slip rate of 0.1 mm/yr which seems to be a more-realistic estimate.

#### A.2.4 Sierra Madre Fault

The Sierra Madre fault is one of the major faults in the Los Angeles region and lies along the southern margin of the San Gabriel Mountains forming one of the most impressive geomorphic features in the Los Angeles area. The fault is recognized by juxtaposition of rock types, shearing and crushing along the fault trace, and by linear land forms (geomorphology). The fault is primarily a thrust fault that has thrust the ancient igneous and metamorphic rocks of the San Gabriel Mountains up and over young Quaternary-age alluvial deposits. The fault zone is very complex and over much of its length comprises several subparallel branches along the northern edge of the San Fernando and San Gabriel valleys. The fault may also be divided into segments along length, each with somewhat different rupture characteristics and histories.

The poor documentation of Quaternary faulting on the Sierra Madre fault makes it difficult to assess its earthquake capability. Based on worldwide empirical fault-length/earthquake-magnitude relationships (Wells and Coppersmith, 1994), the Sierra Madre fault is capable of producing earthquakes in the 7.0 to 7.5 magnitude range (Dolan et al., 1995). If the fault ruptures one of the segments independently, earthquakes of  $M$  7.0 are more likely; if more than one segment ruptures together, larger earthquakes are possible.

About 20 km of the westernmost part of the Sierra Madre fault ruptured the ground surface during the 1971 San Fernando earthquake ( $M_w$  6.7). The 1971 event was characterized by reverse faulting along a fault dipping about  $45^\circ$  to  $50^\circ$  northerly. Geological studies (trenching) of the 1971 rupture (Bonilla, 1973) suggested that a previous rupture had occurred on this fault within the prior few hundred years. In 1991, a  $M$  5.8 earthquake occurred below the San Gabriel Mountains at a depth of about 16 km and is generally believed to have occurred on a branch of the Sierra Madre fault zone. The best available information indicates that large earthquakes on the Sierra Madre fault occur sometime between a few hundred years to a few thousand years ( $\sim 5,000$  years according to Crook et al, 1987). Geological and paleoseismological studies by Rubin et al. (1998) suggest that two prehistoric ruptures within the past 15,000 years had large displacements typical of earthquakes in the  $M$  7.0-7.5 range. For the current study,  $M$  7.2 is preferred.

Reliable geological information on the slip rate of the Sierra Madre fault is scarce and the average time between large ground rupturing earthquakes is poorly known. Some geological studies have indicated that the average rate of displacement for the Sierra Madre fault may be as high as about 3 to 4 mm/year (Southern California Earthquake Center). However, recent paleoseismological studies (Rubin et al., 1998) suggested an average slip rate of only 0.6 mm/yr. This lower rate is based on only one locality within a very long and complex branching fault system, and therefore this rate may not be representative of the entire fault zone. Paleoseismological studies by Tucker and Dolan (2001) on the eastern part of the fault near Azusa revealed a similar minimum slip rate of 0.6 to 0.9 mm/yr and an elapsed time interval

since the most recent surface rupture of 8,000 years or more, but their investigation was also on one of several subparallel faults so the slip rate may be faster if all branches are considered. The California Geological Survey used a slip rate of 2.0 mm/yr ( $\pm 1.0$  mm). In the current study a rate of 2.0 mm/yr is preferred.

#### **A.2.5 Malibu Coast, Santa Monica, Hollywood Fault System (Southern Frontal Fault System)**

One of the major fault systems in the Los Angeles Basin is the along the southern edge of the Santa Monica Mountains separating Mesozoic plutonic rocks from Tertiary and Quaternary sedimentary rocks. The fault system consists of the Santa Monica and Hollywood faults and smaller segments such as the Malibu Coast and Potrero faults (refer to Figure 2-1). Continuation of the fault to the west of Santa Monica is uncertain and the fault system may be related to the Dume-Anacapa fault zone in the offshore area south of Malibu. Together, these faults form the southern boundary fault of the Santa Monica Mountains.

The Santa Monica Mountains rise abruptly to 500-600 m above the Los Angeles Basin floor and are indicative of a large vertical component of faulting. Earthquake focal mechanisms and local geologic relationships suggest reverse faulting with a subordinate left-lateral component. Traditionally, the Santa Monica and Hollywood faults have been considered to comprise the surface expression of the major thrust fault that is responsible for uplift of the Santa Monica Mountains, but investigations in the past decade or so (e.g. Davis et al., 1989; Dolan et al., 1995) postulate that the Santa Monica and Hollywood fault are predominantly strike-slip features and that the mountains are underlain by a separate, but related, blind thrust fault. These interpretations are driven by theoretical stratigraphic models and are based on little specific structural data. Investigations for the Metro Rail Red Line subway drove a tunnel through the Hollywood segment of the fault system and found a major shear zone with the plutonic rocks of the Santa Monica Mountains uplifted over Quaternary alluvium and colluvium. The fault zone consists of a northerly dipping fault with about a 100-m-wide sheared gouge zone.

There have been no large earthquakes associated with Western Transverse Ranges southern boundary fault zone in historical time, but geological studies (e.g. Crook and Proctor, 1992; Drumm, 1992; Fall et al., 1987; Dolan et al., 1997, 2000a, 2000b) have documented Holocene faulting. Although it seems certain that the fault system is one of the major features in the Los Angeles Basin, success at determining slip rates and recurrence intervals has been elusive and the feature remains somewhat of an enigma.

Documented slip rates are less than 1.0 mm/yr but this estimate suffers from lack of data on the lateral slip (Dolan et al., 1997). The California Geological Survey (2003) assumes a slip rate up to about 1.0 mm/yr ( $\pm 0.5$  mm).

The great length of the fault system suggests that it is capable of generating a large earthquake ( $M \sim 7.5$ ) but the discontinuous nature of faulting suggests that faults may behave independently and perhaps a smaller maximum earthquake ( $M \sim 6.5$  to 7.0) is more appropriate. Dolan et al (1997) postulated a  $M_w$  6.6 event for the Hollywood fault. The earthquake recurrence interval is very long and could be on the order of a few thousand years (Dolan et al., 1997).

### **A.2.6 San Pedro Basin Fault**

The San Pedro Basin fault is one of the major faults within the nearby deep seafloor (see Figure 2-1). The fault trends southeasterly from near the base of the Malibu-Santa Monica shelf, past the subsea Redondo Knoll, to about Avalon Knoll east of Catalina Island, a distance of about 70 to 80 km. The fault is expressed as a complicated association of folds, flower structures, and tensional (normal) structures. The fault dips steeply to nearly vertical, which along with the structural expression, indicates it is a strike slip fault (Fisher et al., 2003). Southeast of the Palos Verdes Peninsula, this fault coincides with the western limit of a dense distribution of small-magnitude ( $M_w$  3 to 5) earthquakes.

The fault has several lines of evidence indicating it is an active feature; these include prominent sea floor scarps and deformed young sediments, including flower structures. The San Pedro Basin fault zone lies along or near the contact between basement rocks on the west and basin sedimentary fill to the east. The nature of fault separation across the fault varies considerably within short distances. The sense of displacement changes in closely spaced (a couple kilometers) seismic-reflection profiles from reverse to normal faulting. Such changes are typical of strike-slip faults.

The slip rate is unknown but the similarity of geomorphology, structures, and length to the NISZ suggest that they are similar features and therefore could have similar slip rates of about 1 mm/yr and similar maximum earthquakes. Fault-length/earthquake-magnitude relationships (Wells and Coppersmith, 1994) indicate a maximum earthquake of about  $M$  7.0 to 7.2 but the feature is highly segmented indicating smaller magnitudes ( $M \sim 6.5-7.0$ ) may be more likely.

### **A.2.7 Elysian Park Fold and Thrust Belt**

The Elysian Park Fold and Thrust Belt (EPFT) was initially a product of Davis et al. (1989) who postulated that the Los Angeles area is underlain by a deep master detachment fault and that most of the folds and faults in the region result from slip along the detachment causing folding and blind thrust faulting at bends and kinks in the detachment fault. Shaw and Suppe (1996) further developed and refined the detachment/blind thrust model. They proposed several zones of subsurface faulting and folding consisting of the Elysian Park trend, the Compton-Los Alamitos trend, and the Torrance-Wilmington trend. Few of these thrust ramps have actually been seen in well data or seismic-reflection surveys because the features are generally postulated at depths beyond the capability of drilling or seismic reflection methods (e.g. 10 to 15+ km). Geophysical methods that can reach the necessary depths do not have the capability to resolve the features so these structures remain problematic.

The detachment/blind thrust model was initially embraced primarily because the 1987 Whittier Narrows earthquake occurred in proximity to one of the postulated thrust ramps beneath the Elysian Park fold belt. Subsequent work (e.g. Shaw and Suppe, 1996; Oskin and Sieh, 1998; Bullard and Lettis, 1993; Shaw and Shearer, 1999; Shaw et al., 2002) has highly modified the original model and at present most seismic hazard analyses recognize only the Upper Elysian Park Thrust (see Figure 2-1).

Shaw and Suppe (1996) postulated a slip rate of  $1.7 \pm 0.4$  mm/yr for the Elysian Park thrust. Estimates of earthquake magnitudes associated with these thrust faults range from 6.6 to 7.3

depending on the size (area) of the individual segments and whether they rupture independently or together. Recurrence interval estimates range from 340 to 1,000 years. Oskin et al. (2000) model the Upper Elysian Park thrust as extending from the Hollywood fault to the Alhambra Wash fault with a slip rate of 0.8 to 2.2 mm/yr and magnitude 6.2 to 6.7 earthquakes with recurrence interval in the range of 500 to 1300 years. The California Geological Survey, following the lead of Oskin et al. (2000), models the Upper Elysian Park thrust as a feature about 18 km long and dipping 50° northeasterly with a slip rate estimate of about 1.3±0.4 mm/yr. The current study preferred a mean characteristic earthquake of 6.4, and utilized the 1.3 mm/yr slip rate.

### **A.2.8 Puente Hills Fault System**

The Puente Hills Thrust fault system (PHT) is the name currently given to a series of northerly dipping subsurface thrust faults (blind thrusts) extending about 40-45 km along the eastern margin of the Los Angeles Basin. Shaw and Shearer (1999) synthesized oil-company data and seismicity to interpret three discrete thrust faults underlying the LaBrea/Montebello Plain, Santa Fe Springs Plain, and Coyote Hills. These faults are similar to faults previously named the Las Cienegas and Norwalk faults (see for example, Wright, 1991; Harding and Tuminas, 1988; Schell, 1997). These faults form an en echelon arrangement from the northern Los Angeles Basin to the southern part of the Puente Hills (refer to Figure 2-1). Although not included in the Puente Hills fault system as presently conceived, similar en echelon, north-dipping thrust faults continue southeasterly along the entire northeastern Los Angeles Basin margin into the Santa Ana Mountains; these other faults occur below the Richfield oil field and the Peralta Hills (see Figure 2-1). The Whittier Narrows earthquake is now believed to have occurred on this structure (Shaw and Shearer, 1999).

Down-dip projection of the Santa Fe Springs segment of the Puente Hills faults extends to the approximate depth of the 1987 Whittier Narrows earthquake which Shaw and Shearer (1999) relocated to about 15 km depth. The close association of seismicity to the fault projections indicates that the fault is seismically active. Shaw and Shearer proposed that the Puente Hills fault system was capable of generating about magnitude 6.5 to 7.0 earthquakes and had a slip rate of between 0.5 to 2.0 mm/yr. The 0.5 mm/yr rate was derived by dividing the postulated slip by the age of strata (i.e. Quaternary ~1.6 million years), whereas the 2.0 mm/yr slip rate was derived by assuming that all of the unaccounted-for, geodetically determined, crustal shortening across the Los Angeles Basin (~ 8 to 9.5 mm/yr) is occurring on the Puente Hills fault system. Depending upon ones interpretation, there may be much less than 2.0 mm/yr of slip unaccounted for by known faults, and there may be other yet-undiscovered subsurface faults so the 2.0 mm/yr rate for the Puente Hills fault seems too high for just one fault. It should be noted that this rate is twice that of the Newport-Inglewood structural zone, a prominent active fault of about the same age with abundant surface manifestations such as surface faulting and uplifted hills and mesas as well as abundant historical earthquake activity.

Subsequent work on the fault system (Shaw et al., 2002) infers that the en echelon segments of the Puente Hills Thrust are related and displacements are gradually transferred from one segment to the next. These later studies resulted in estimates of slip between 0.44 to 1.7 mm/yr with the preferred rate between 0.62 and 1.28 mm/yr. Using empirical data on rupture area, magnitude, and coseismic displacement, Shaw et al. (2002) estimated earthquakes of  $M_w$  6.5-6.6 and multi-

segment rupture of  $M_W$  7.1. The recurrence intervals for these events are on the order of 400 to 1,320 years for single events and 780-2600 years for  $M$  7.1 events.

Paleoseismological studies using trenching and borings in the Santa Fe Springs area (Dolan et al., 2003) identified four buried folds which they interpreted to be a result of  $M_W$  7.0± earthquakes within the past 11,000 years.

The most recent seismic hazard model by the California Geological Survey (2003) used a slip rate of  $0.7 \pm 0.4$  mm/yr. This rate was adopted in the current study, and a mean characteristic earthquake of 7.1 considered appropriate.

### **A.2.9 THUMS-Huntington Beach Fault**

The THUMS-Huntington Beach (THB) fault has been interpreted in many different ways and there is disagreement on many aspects and at many different levels. The THB has been interpreted as both a high-angle normal fault and an oblique right-lateral normal fault (Truex, 1974; Clarke et al., 1987; Wright, 1991). Davis et al. (1989) interpreted the THB fault to be a high-angle ( $80^\circ$ ) reverse fault in the upper plate of a  $45^\circ$  northeast-dipping Torrance-Wilmington blind thrust fault. Wright (1991) and Truex (1974) described the fault as a southeast-trending fault extending offshore from the Palos Verdes fault in the Los Angeles Harbor area along the southwest flank of the Wilmington Anticline, past the Huntington Beach oil field to the Newport Beach area where it converges with the Newport-Inglewood Structural Zone. This alignment is about 35 to 40 km long but is discontinuous, poorly expressed, and was based on very limited and spotty data (Wright, 1991). In the area between Long Beach and Huntington Beach, several offshore geophysical (seismic-reflection) investigations for numerous oil and engineering projects (e.g. pipelines, offshore power plant, drilling islands, etc) have documented several near-surface faults but these are short, small displacement, discontinuous, random features that do not appear to align such that they could be considered representative of a major regional active fault.

Recent, detailed, high-resolution, 3-dimensional seismic-reflection data in the Long Beach-Los Angeles harbor area reveals it as a low-angle easterly dipping thrust fault (D. Clarke, Long Beach City Geologist, 2004; and S. Prior, THUMS Senior Geologist, 2004). This fault revealed by the geophysical data is shown on the cross sections A-A' (see Figure 2-4) and B-B' (see Figure 2-5). The fault generally dips about  $25^\circ$  to  $35^\circ$  easterly, displacing schist basement over Miocene-age marine sedimentary rocks. Displacement decreases northwesterly and the fault dies out near the cross-section B-B' (see Figure 2-5) located in the western area of the Long Beach Harbor, where the basement offset decreases to zero (compare cross sections A-A' and B-B').

The 3-dimensional seismic data show the fault terminating at a prominent angular unconformity at the base of the Pico Formation which is of late Pliocene age (~2 to 3 million years old). The termination is abrupt and represents a cessation of principal activity on the THB fault, and a long period of submarine erosion. The strata directly overlying the unconformity are concordant with the unconformity and do not exhibit any onlap or offlap that might indicate continuing displacement on the fault during deposition of the younger sediments. This indicates a long period of inactivity for the fault.

However, the overlying strata do exhibit a gentle dip of about  $6^\circ$ , on both the northeast and southwest flanks of the anticline, indicating that some uplift occurred in the region during Pleistocene or later time. The source of this warping is undoubtedly tectonic but the implications are poorly understood. At least some of the uplift is related to regional tectonics as indicated by documented uplift in the area of the anticline associated with the 1933 Long Beach earthquake (Castle and Buchanan-Banks, 1989). Recent interpretations by Edwards et al. (2001, 2002, 2003) have interpreted the warped unconformity as indicating that the THB fault has been active in Quaternary time (i.e. the past 400,000 to 600,000 years) and that the fault is capable of generating large-magnitude earthquakes with recurrence intervals on the order of a thousand to several thousand years (Ponti, 2004).

If the THB fault is projected dipping downward to the east, it would intersect the NISZ at about 8 to 9 km depth raising the issue of whether it cuts off the NISZ or whether the NISZ cuts off the THB (Figure B-8). The high degree of young deformation on the NISZ and its historical seismic activity indicate that the NISZ is much more active and therefore favors the latter interpretation. If so, the warping in the Wilmington anticline area could be related to regional tectonic compression between the more-active Palos Verdes and Newport-Inglewood faults, both of which have prominent surface expression and abundant evidence of much-more-recent seismotectonic activity. The THB structure, like many other contractile structures in the Los Angeles Basin (Tsutsumi et al., 2001), appears to have become largely inactive beginning in Pliocene time with younger deformation occurring on structures such as the Palos Verdes and NISZ.

#### **A.2.10 Compton-Los Alamitos Thrust Ramp**

As discussed above under the Elysian Park Thrust, several geoscientists have proposed that the Los Angeles region is underlain by a network of low-angle to horizontal thrust faults and detachment faults. None of these structures have been imaged on seismic reflection data or encountered in boreholes. One of the major features in these models is the Compton-Los Alamitos (CLA) trend is hypothesized to dip easterly under the central Los Angeles basin. The trend is several kilometers wide and dips downward at low angles to the northeast and extends from the Central Basin detachment (decollement) to the Torrance-Wilmington trend where it becomes a horizontal detachment fault. Included within the wide swath are the Los Alamitos fault, the Newport-Inglewood Structural Zone, and the Palos Verdes fault which are discussed independently above as discrete features unrelated to the detachment/blind thrust models.

The CLA thrust model was developed by Shaw and Suppe (1996) following the lead of Davis et al. (1989). The feature comprises a thrust ramp and several overlying folds which are postulated to result from slip on the deep detachment and interconnected thrust ramps. Folded Pliocene and Quaternary strata indicate slip rates of 1.4 mm/yr. Assuming that slip is released in large earthquakes, Shaw and Suppe (1996) estimate earthquake magnitudes of 6.3 to 6.8 on individual ramp segments, and magnitude 6.9 to 7.3 if segments rupture together. Recurrence intervals are estimated from empirical earthquake-magnitude/fault-displacement relationships (Wells and Coppersmith, 1994). Estimates of earthquake recurrence intervals range from 380 years for single segments to 1300 years for multiple segment ruptures. As mentioned in the description of the Elysian Park Thrust, these rates and events are commonly greater than estimates for the more-prominent surface faults within the region.



Because these postulated blind fault/detachment faults extend below the major active surface faults in the Los Angeles region, the models must incorporate and accommodate these faults. Generally the models involve some type of transecting relationship whereby the major faults like the Palos Verdes, NISZ, and Whittier faults are cut off at depth. Generally this relegates the most prominent and active features in the Los Angeles region to secondary roles. This has resulted in these models being rejected by most seismic hazard analyses, or given only secondary importance. The California Geological Survey removed the Compton blind thrust from their seismic-hazard model based on investigations by Rockwell and Mueller (Mueller, 1997) who excavated a trench and placed cone penetrometer borings across the axial trace of the feature and found that peat deposits dated at 1,900 years and the Gaspar aquifer dated at 15,000-20,000 years are not deformed. However, there are still unresolved issues so the Compton Thrust is included in the current study for the sake of conservatism.

#### **A.2.11 Los Alamitos Fault**

The Los Alamitos fault is a northwest-southeast trending subsurface fault along the northeast side of the NISZ (see Figure 2-1). The fault is not well known because it is not exposed at the surface. The fault extends upward from the basement rocks to an elevation of about -300 ft (MSL), and is subparallel to the NISZ from at least Seal Beach to Rosecrans. The American Association of Petroleum Geologists (1988) regional cross section shows the feature dipping about 70° to the southwest. The fault is shown as a dotted feature (i.e. buried fault) on the state fault map of Jennings (1994) who assigned it an age of late Quaternary. The Los Angeles County Seismic Safety Element (1990) shows it as potentially active. The fault is shown on the Caltrans seismic hazard map (Mualchin 1996) with a maximum earthquake magnitude of 6.0.

The existence of the feature is known from oil-field data in the Dominguez Oil field that shows faulted and steeply dipping strata (McMurdie, 1973), and from gravity data (Yerkes et al., 1965). Earthquake activity along the northeast side of the NISZ suggests the presence of a seismically active fault. Analysis of historical seismicity by Hauksson (1987) showed a relatively large number of earthquakes 3 to 5 km northeast of the NISZ. The northeastern limit of these events is quite linear, and earthquake focal mechanisms indicate both normal and right-lateral strike-slip motions. Wright (1991) suggests that the feature represents the eastern edge of uplifted basement of the western Los Angeles Basin and that the fault is a zone of en echelon tension joints or gash fractures along the edge of the basement block. Wright considered that the feature may extend from about the San Joaquin Hills to the Baldwin Hills and that it represents a right-oblique reverse fault along which the northeast flank of the NISZ has overthrust the axial portion of the Los Angeles Basin central trough.

The youngest displaced sediments are the middle-Pleistocene-age (~650,000-800,000 years old) San Pedro formation. Although there is no documented surface faulting or even late-Quaternary displacement, the fault should be considered as a potential source of small- or moderate-magnitude earthquakes, similar to other buried faults in the Los Angeles Basin. For seismic design purposes, a M 6.0-6.5 earthquake is appropriate for the maximum earthquake based on the fault's length according to the empirical fault-length/earthquake-magnitude relationships of Wells and Coppersmith (1994). A slip rate of 0.5 mm/yr is assumed in the current study.

### **A.2.12 Other Faults**

There are several minor unnamed faults on the offshore San Pedro shelf. These features were detected by various geophysical surveys for local pipelines. These features are too small and discontinuous to represent a seismic hazard and therefore are not significant for seismic design. An example of this type of feature is the Navy Mole Fault as shown on Figure 2-3.

# **APPENDIX B**

## **Details on Seismic Source Parameters**

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## APPENDIX B

# DETAILS ON SEISMIC SOURCE PARAMETERS

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## APPENDIX B

# DETAILS ON SEISMIC SOURCE PARAMETERS

This appendix provides a more-detailed discussion of the various aspects of the faults that were used in the seismic hazard analysis for the POLB. All faults which might have a potential impact on the site are described in detail in Appendix A and are summarized in Sections 2 and 3 (see Tables 3-1, 3-2 and 3-3) of the main text.

### B.1 PALOS VERDES FAULT

The Palos Verdes fault extends from the east side of the Palos Verdes Peninsula offshore southeasterly to the Lasuen Knoll area and northwesterly into the Santa Monica Bay, for a total length of about 100 km. However, as described Appendix A, the northern part in Santa Monica Bay is not considered to be active so the hazard model is based on the southern segment from the Redondo Canyon fault to Lasuen Knoll, a total length of 62 km. The location of the Palos Verdes fault in the Port of Long Beach region is shown in Figure 2-3.

#### B.1.1 Segmentation

Three segments of the Palos Verdes fault are considered: the Southern Offshore segment (SO), Palos Verdes Hills segment (PVH), and the Santa Monica Bay segment (SMB). The approximate lengths of the segments are 36 km for the SMB segment, 12 km for the PVH segment, and 50 km for the SO segment.

The 2003 USGS fault model does not include a segmentation point along the Palos Verdes fault. Since the SMB segment does not displace strata younger than Pliocene, this segment is not considered to be active in our model. Therefore, unlike the USGS model, the SMB segment is modeled as a separate segment (with zero slip-rate).

The segmentation of the SO segment is not well known. For faults with unknown segmentation, common practice is to assume that the characteristic magnitude would correspond to rupture at 1/2 of the mapped fault length. To address the segmentation uncertainty, two segmentation models were considered: (1) an “unsegmented model” in which the full length of the SO segment is assumed to rupture, and (2) a “segmented model” in which 1/2 of the length of the SO segment is assumed to rupture. The PVH segment is assumed to fully rupture for both the segmented and unsegmented model. The segmented and unsegmented models were given equal logic-tree weightings.

In the USGS model, the dip of the fault is  $90^\circ$  and the down-dip fault width is  $13 \pm 2$  km. As discussed in Appendix A.2.1, the dip of the Palos Verdes fault changes along the strike. This variation in dip can be seen in the Southern California Earthquake Center (SCEC) community

fault (CF) model (refer to Figure B-1). In the SCEC CF Model, the crustal thickness is 18 km for the PVH and SMB segments, thinning for the SO segment (Shaw, 2004).



**Figure B-1. Faults from the Southern California Earthquake Center (SCEC) Community Fault (CF) Model**

For the hazard analysis, a single dip and fault width is used for each segment. A dip of  $90^\circ$  is used for all three segments. For the PVH segment, widths of 15 and 18 km are used with equal weights, corresponding to the SCEC CF Model width and the thicker end of the USGS model. For the SO segment, widths of 11, 13, and 15 km are used with weights of 0.2, 0.6 and 0.2, respectively, based on the USGS model.

### B.1.2 Slip-Rate

As discussed in detail in Appendix A.2.1, the Palos Verdes fault has a range of slip rates of about 2.0 to 4.0 mm/yr. The favored rate most commonly used by the geological community is the 3.0 mm rate and this rate is considered conservative because it is based on the maximum slip/displacement data. A slip-rate of 2 mm/yr is considered more likely than a slip-rate of 4 mm/yr because the 3.0 mm/yr rate was based on maximum parameters. Therefore, the following slip-rates and weights are used for the slip-rate on the PVH and SO segments: 2.0 mm/yr (weight=0.4); 3.0 mm/yr (weight=0.5); 4.0 mm/yr (weight=0.1).

### B.1.3 Style of Faulting

The Palos Verdes fault was modeled as a strike-slip fault for ground motion calculations. Geological data discussed in Appendix A indicate a horizontal to vertical slip ratio of 6 or 7 (H) to 1(V) with up to about 10 % of the slip comprising the vertical slip component.

### B.1.4 Characteristic Earthquake Magnitude

The mean magnitude of the characteristic earthquake is computed using the three magnitude-area relations given in Section 3 of the main text for the range of segment lengths and widths given above. The segmentation model described in Section B.1.1 reduces the mean characteristic magnitude of the fault by 0.25 magnitude units. Mean magnitudes range from 6.9 to 7.2 for the unsegmented model, and 6.65 to 6.95 for the segmented model. The alternative values of the mean characteristic magnitudes and their associated weights are shown in Figure B-2. The segmented and unsegmented models were given equal logic-tree weightings.

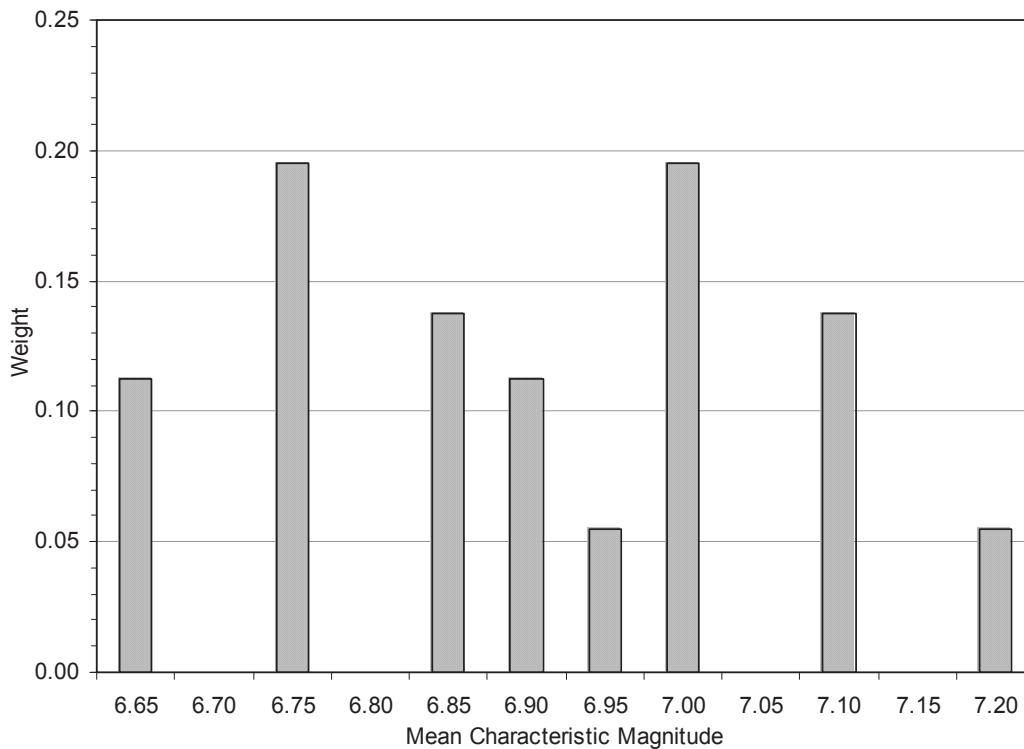
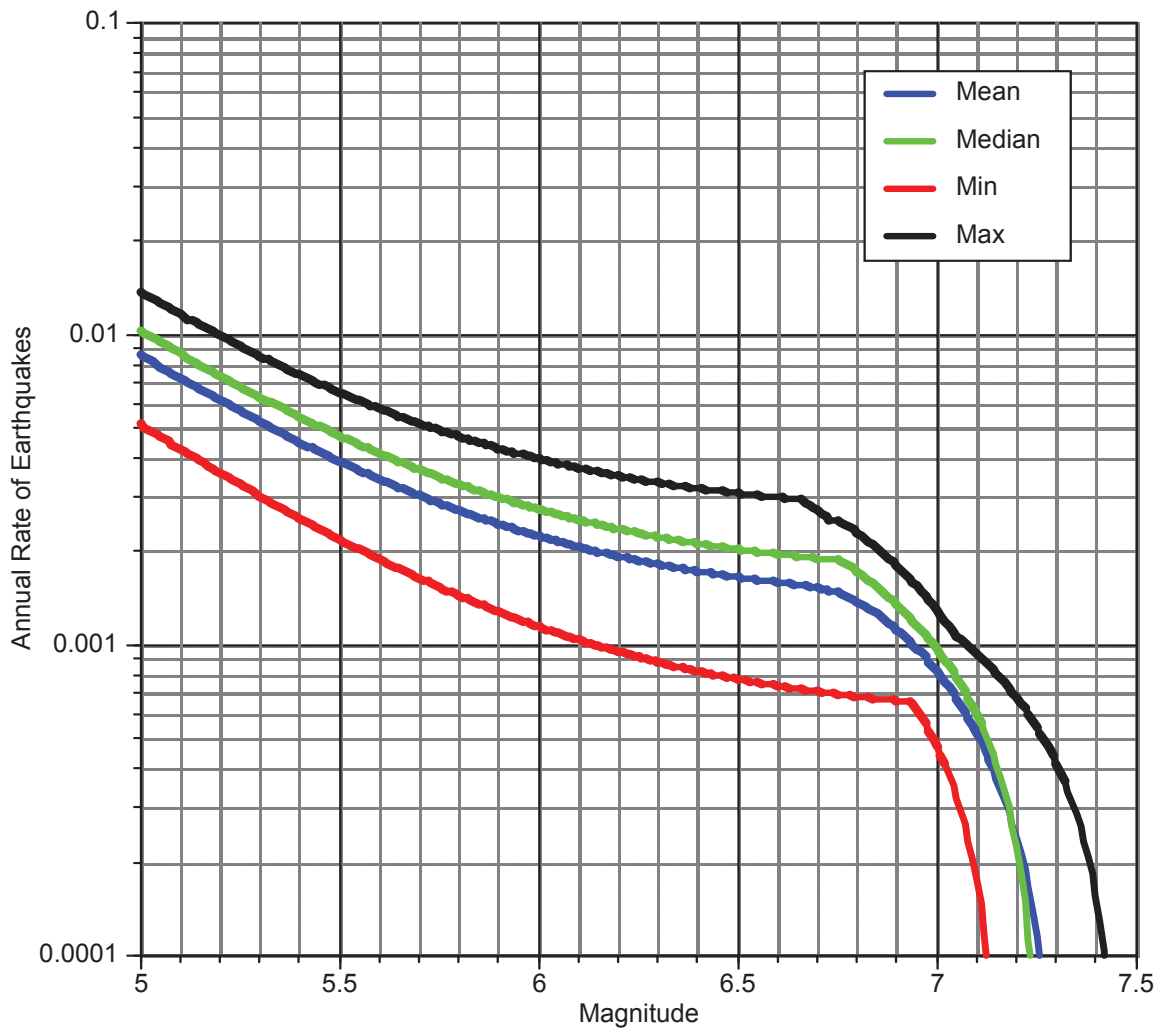


Figure B-2. Mean Characteristic Magnitudes for the Palos Verdes Fault



### B.1.5 Recurrence

The recurrence models that result using the slip-rates and characteristic magnitudes given above with the Youngs and Coppersmith (1985) magnitude probability density function are shown in Figure B-3. Using the mean model, the recurrence interval of magnitude  $\geq 7$  earthquakes is about 1,000 years.



**Figure B-3. Recurrence for the Palos Verdes Fault**

## B.2 NEWPORT-INGLEWOOD STRUCTURAL ZONE

The Newport-Inglewood Structural Zone (NISZ) comprises a northwest-southeast trending series of faults and folds underlying the alignment of hills in the western Los Angeles Basin, between the Baldwin Hills and the area offshore of Newport Mesa. A detailed discussion of the NISZ is provided in Appendix A.

### **B.2.1 Segmentation**

The total length of the NI fault is 65 km. The Newport-Inglewood (NI) fault lacks clear-cut segment boundaries. The USGS (2003) uses a down-dip width of  $13 \pm 2$  km. The SCEC CF Model uses a width of about 18 km along the northern part of the NI fault, with a thinning fault in the south. The average width is about 16 km. Widths of 13 and 16 km were used with equal weights.

The segmentation of the offshore NI fault is not well known. For faults with unknown segmentation, common practice is to assume that the characteristic magnitude would correspond to 1/2 of the fault length. To address the segmentation uncertainty, two segmentation models were considered (analogous to the model described in Section B.1.1 for the PV fault): (1) an “unsegmented model” in which the full length of the offshore fault is assumed to rupture, and (2) a “segmented model” in which 1/2 of the length of the fault is assumed to rupture. The unsegmented and segmented models were given equal weights.

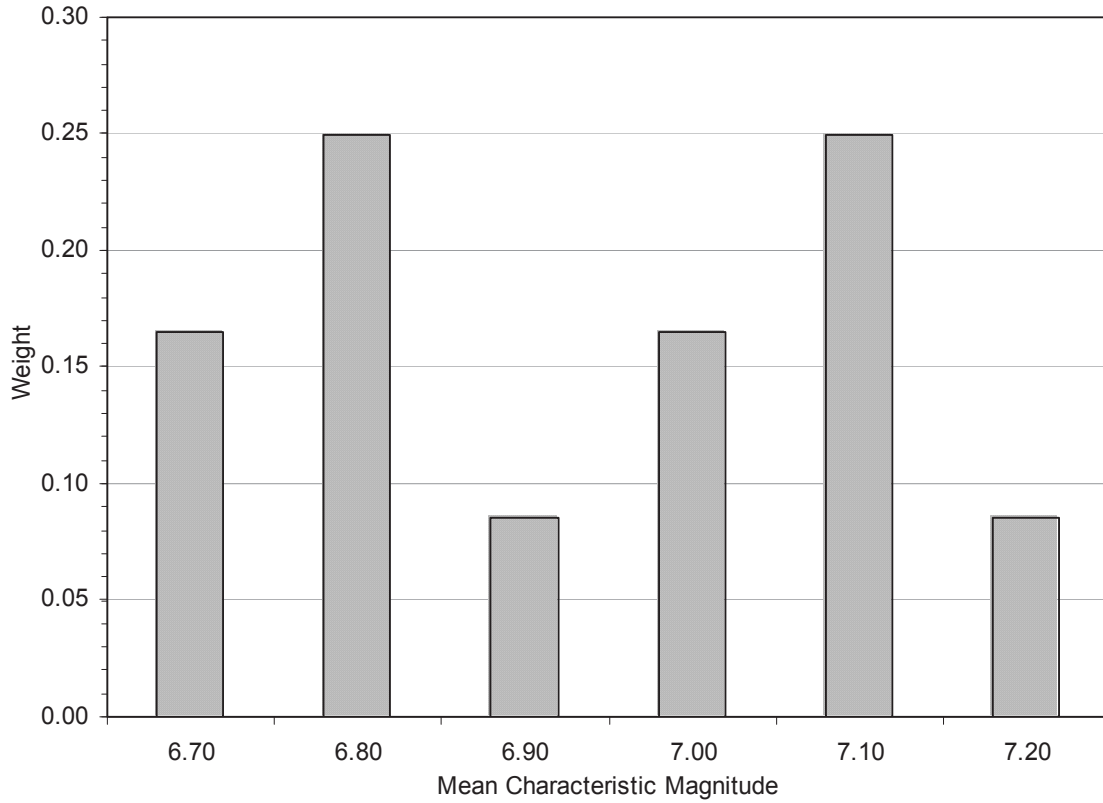
### **B.2.2 Slip-Rate**

The rate of fault slip is poorly known but seems to be very low. Although quite a wide range of slip rates are proposed by various published sources, most of them are of uncertain validity because they are based on short-term, local, vertical components rather than regional horizontal slip. Most seismic hazard studies have used a long-term rate of 0.5 mm/yr based on offset of Pliocene structures and strata (Freeman et al., 1992). However, most of the deformation within the NISZ seems to have occurred within Quaternary time so the rate during more recent times may be greater. Recent seismic hazard studies (e.g. California Geological Survey, 2003) commonly use a slip rate of about 1.0 mm/yr.

Following the USGS model, the slip-rate is  $1.0 \pm 0.5$  mm/yr. The following values are used in the logic tree: 0.5 mm/yr (weight=0.2), 1.0 mm/yr (weight=0.6), and 1.5 mm/yr (weight=0.2).

### **B.2.3 Characteristic Earthquake Magnitude**

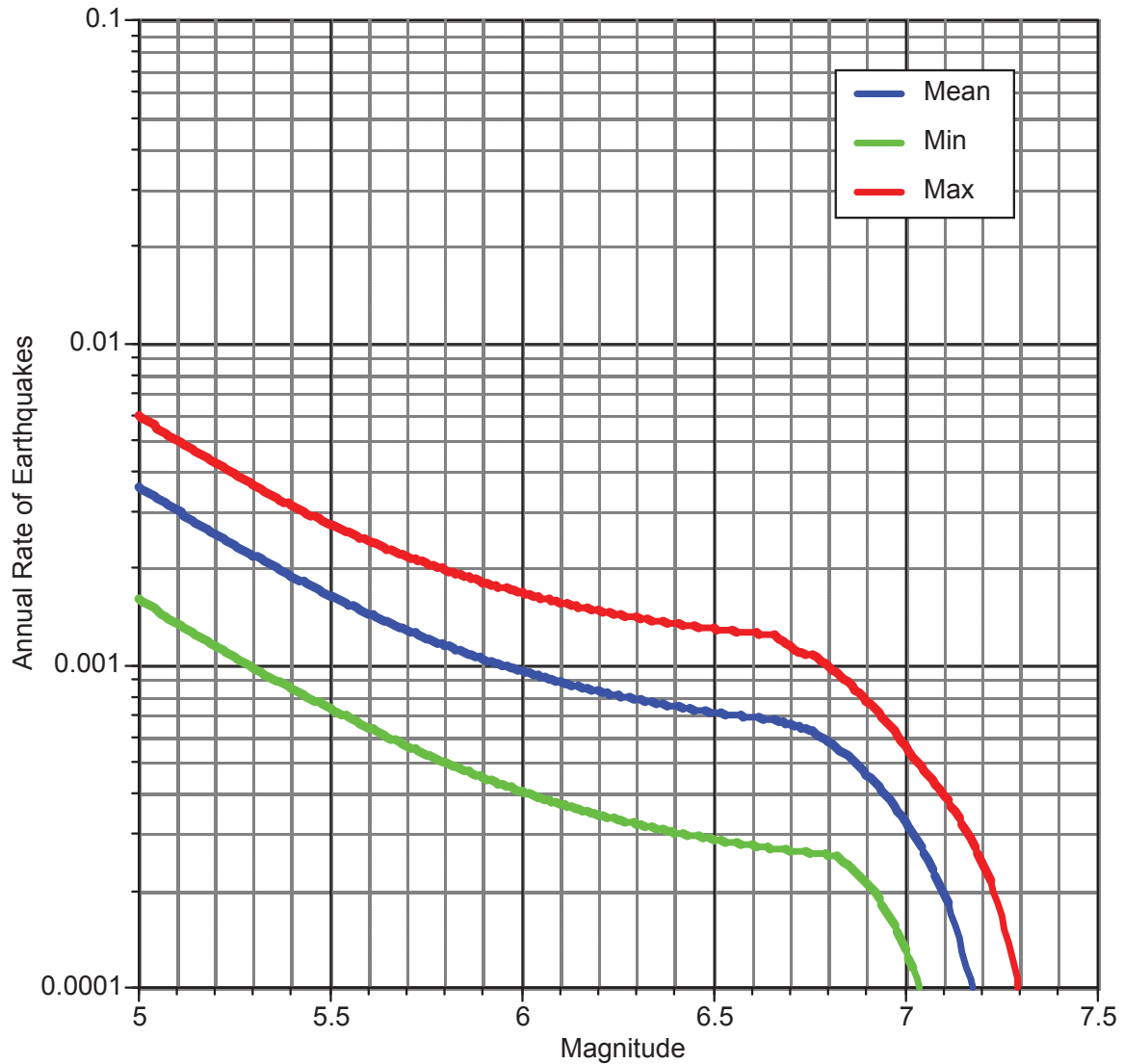
The mean magnitude of the characteristic earthquake is computed using the three magnitude-area relations described in Section 3.1. The segmentation model described in Section B.1.1 reduces the mean characteristic magnitude of the fault by 0.30 magnitude units. The estimates of the mean characteristic magnitudes range from 7.0 to 7.2 for the unsegmented model, and 6.7 to 6.9 for the segmented model. The maximum historical earthquake was a magnitude 6.3 event in 1933. The resulting alternative values of the mean characteristic magnitude and their associated weights are shown on Figure B-4. The unsegmented and segmented models were given equal weights.



**Figure B-4. Mean Characteristic Magnitudes for the Newport-Inglewood Structural Zone Fault**

### B.2.4 Recurrence

The recurrence intervals for large earthquakes on the NISZ are poorly known but all estimates are long, generally in the thousand-year range. Geological data indicate that the fault has had 3 to 5 surface ruptures in Holocene time (refer to Appendix A.2.2) suggesting average recurrence intervals of a couple thousand years. The recurrence relations used in this model are shown on Figure B-5.



**Figure B-5. Recurrence for the Newport-Inglewood Structural Zone Fault**

### B.3 CABRILLO FAULT

The Cabrillo fault extends from the Palos Verdes Hills into the offshore area where it appears to deform the seafloor and to merge southeasterly with the Palos Verdes fault (refer to Figure 2-1). The length is 18 km and the fault dips 50° to 70°. The width of the fault plane is assumed to be the similar to the Palos Verdes fault, i.e. 15 or 18 km with equal weight. The fault is described in detail in Appendix A.2.3. The Cabrillo fault is commonly not considered in most seismic hazard analyses but it was included here because of its proximity to the POLB.

### **B.3.1 Slip-Rate**

The slip rate is difficult to estimate due to lack of data. Most geoscientists feel that the Cabrillo fault is a minor feature, and Ward and Valensise (1994) estimated a slip rate of 0.1 mm/yr which seems to be a realistic estimate for such a minor feature.

### **B.3.2 Style of Faulting**

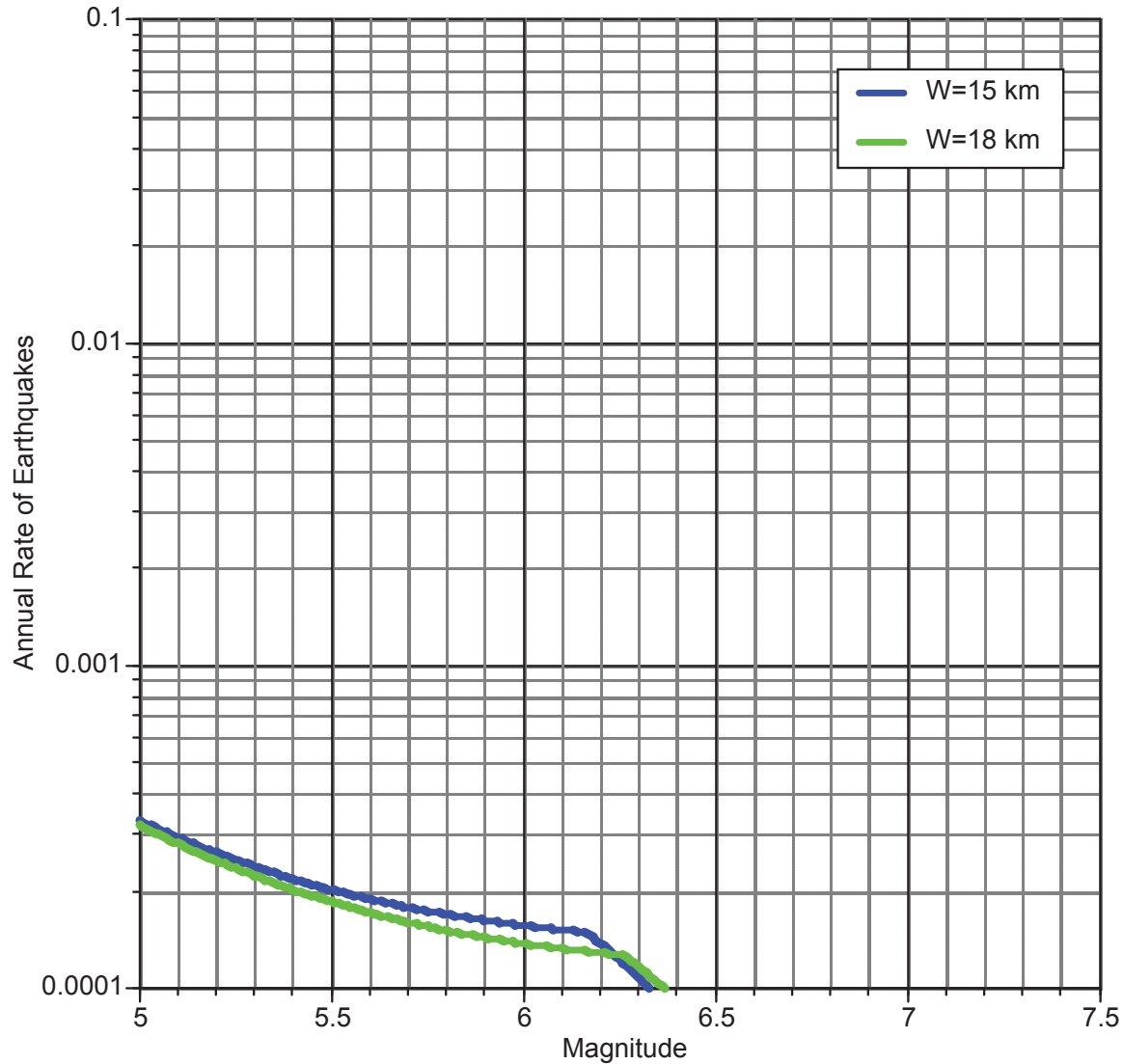
Although the Cabrillo fault may have a small component of normal displacement, it is assumed to be strike-slip primarily because of its close association with the strike-slip Palos Verdes and Newport-Inglewood faults, as well as other faults in the Southern California Continental Borderland, such as the San Pedro Basin fault, which are primarily strike-slip faults.

### **B.3.3 Characteristic Earthquake Magnitude**

The mean magnitude of the characteristic earthquake is computed using the Wells and Coppersmith (1994) model and Hanks and Bakun (2002) model. The Ellsworth model (described in Chapter 4 in USGS, 2003) is only applicable for areas greater than 500 km<sup>2</sup>, so it has not been used here. Using these models, the mean characteristic magnitudes are 6.4 and 6.5 for widths of 15 and 18 km, respectively.

### **B.3.4 Recurrence Relation**

The alternative recurrence relations for the Cabrillo fault are shown in Figure B-6.



**Figure B-6. Recurrence for the Cabrillo Fault**

#### **B.4 SAN PEDRO BASIN FAULT**

The San Pedro Basin fault is one of the major faults within the nearby seafloor. Described in detail in Appendix A, the fault zone comprises a zone of faults and folds that trend southeasterly from near the base of the Malibu-Santa Monica shelf to the vicinity of Avalon Knoll, a distance of about 70 km. Although the faults in the zone have many variances, at depth the fault dips nearly vertical, indicating that it is probably a strike slip fault (Fisher et al., 2003). The fault has abundant evidence indicating that it is an active feature including a coincidence with small-magnitude earthquakes near its southeastern end. The width of the San Pedro Basin fault was assumed to be 15 km.

#### **B.4.1 Segmentation**

The segmentation of this fault is not well known. Rather than applying a segmentation model similar to that described in Section B.1.1 for the PV fault, this fault was assumed to be unsegmented for simplicity and because it is not a controlling fault.

#### **B.4.2 Slip-Rate**

There are no specific data on the rate of slip for the San Pedro Basin fault. The length of the fault and the prominent seafloor geomorphic expression, both of which are similar to the NISZ, suggest that the fault is a major feature. The slip-rates assumed for the San Pedro Basin fault are 0.5 and 1.0 with weights of 0.6 and 0.4, respectively.

#### **B.4.3 Style of Faulting**

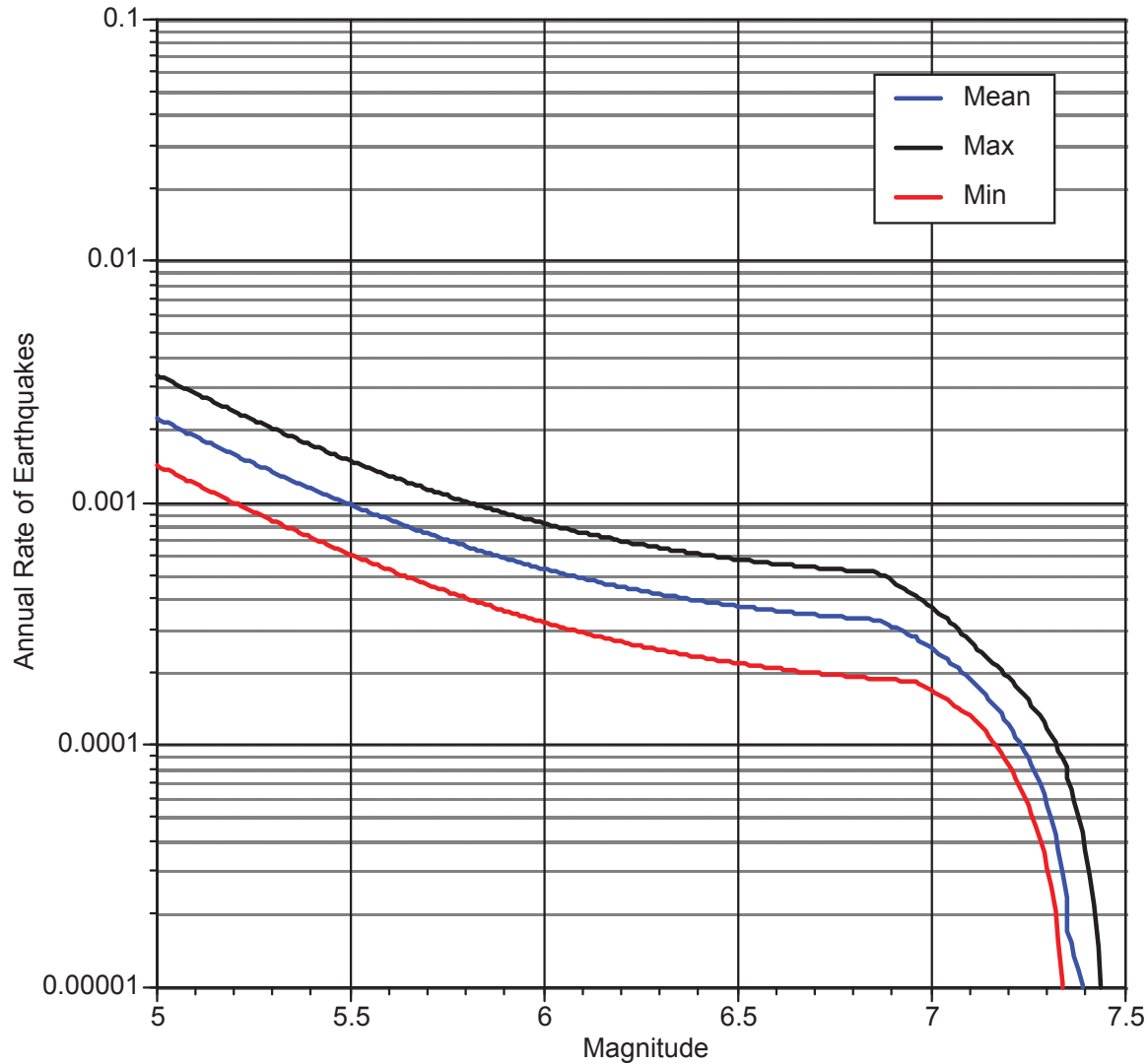
The San Pedro Basin fault is thought to be a strike-slip slip fault because of its structural character (e.g. vertical-dip flower structures) and its association with other strike-slip faults in the southern California region.

#### **B.4.4 Characteristic Earthquake Magnitude**

The mean magnitude of the characteristic earthquake is computed using the Wells and Coppersmith (1994) model and Hanks and Bakun (2002) model. The Ellsworth model (described in Chapter 4 in USGS, 2003) is only applicable for areas greater than 500 km<sup>2</sup> so it has not been used here. Using these models, the mean characteristic magnitudes are 7.1 and 7.2 with equal weights.

#### **B.4.5 Recurrence**

The alternative recurrence relations for the San Pedro Basin fault are shown in Figure B-7.

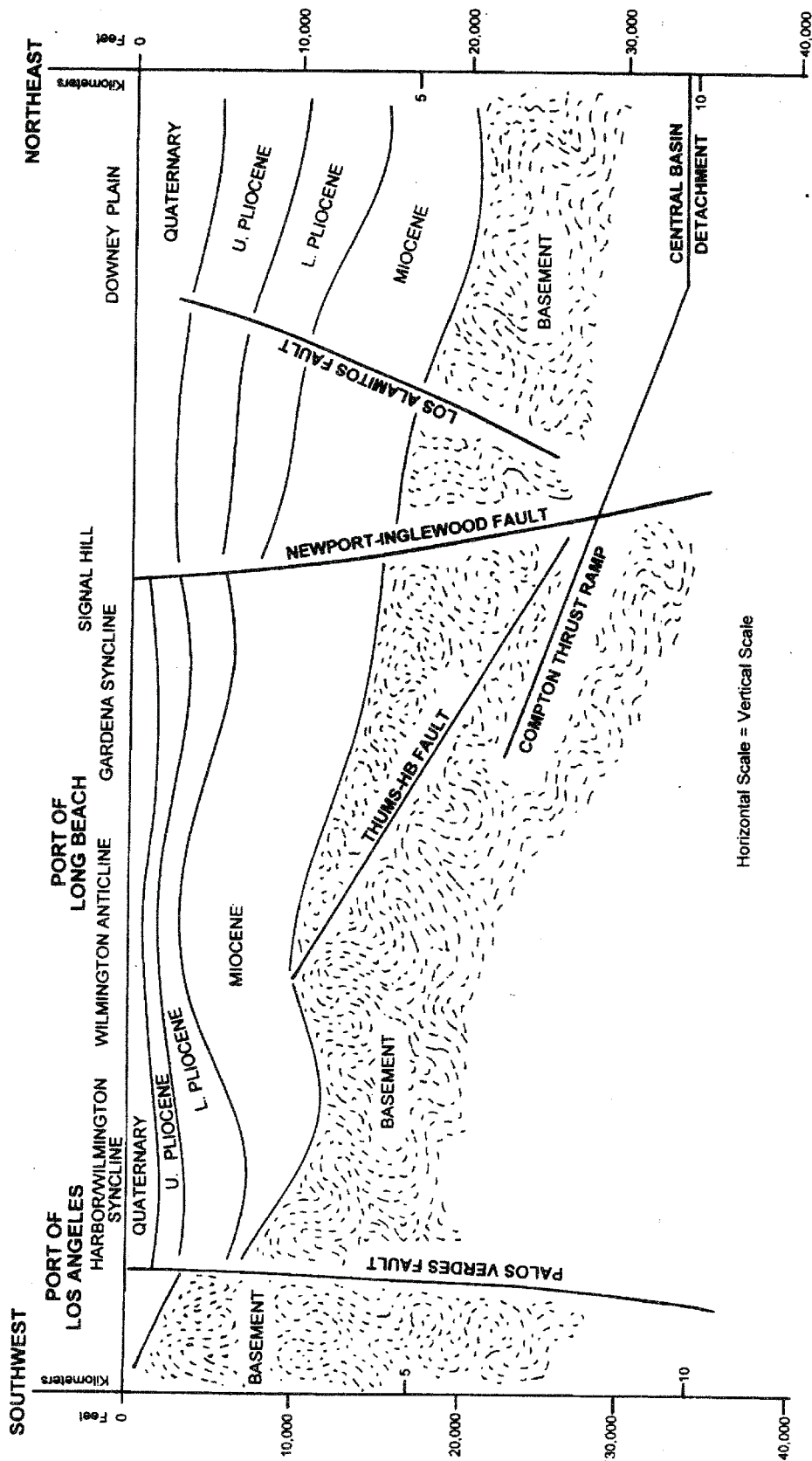


**Figure B-7. Recurrence for the San Pedro Basin Fault**

### B.5 THUMS-HUNTINGTON BEACH FAULT

Shaw (2004) considers the THB fault to be the updip extension of the Compton Thrust (refer to Figure B-8). Therefore, the THB is not modeled as a separate source. The inclusion of the THB fault does not affect the characteristic magnitude of the Compton Thrust because it makes only a very small change to the total fault area. The main impact of considering the THB fault active is that the closest distance from the Compton Thrust fault is reduced from 6 km to <1 km. While it is considered unlikely that the THB is an active fault (refer to Appendix A), the Shaw (2004) model was included with a weight of 0.1. The weight for the THB fault being inactive is 0.9.





Horizontal Scale = Vertical Scale

Figure B-8. Structural relations of postulated Compton Thrust Ramp and known faults

## **B.6 COMPTON-LOS ALAMITOS FAULT ZONE/THRUST RAMP**

In the SCEC CF Model (refer to Figure B-1), the Compton thrust is no longer interpreted to cut off the Palos Verdes fault, except for the Santa Monica Bay segment which is modeled as an inactive fault. Shaw (2004) proposes that the Newport-Inglewood Structural Zone is offset at depth (10-11 km) by the Compton Ramp (refer to Figure B-8); however, this offset is not considered to prevent rupture of either the shallow (<10 km) or the deep (10 to 18 km) segments of the Newport-Inglewood fault. Because these blind fault/detachment fault models extend below the major active surface faults but largely fail to provide mechanisms by which they all could be active within a very limited strain budget, these models have been rejected by most seismic-hazard analyses or given only secondary importance. While considered unlikely that the Compton thrust is an active fault, it was considered as an alternative in the logic tree. The weight given to the fault being an active source is 0.2.

### **B.6.1 Slip-Rate**

Shaw (2004) recommended using a slip-rate on the Compton ramp of 0.5 – 1.0 mm/yr, and for this study slip-rates of 0.5 and 1.0 mm/yr were therefore used with equal weights.

### **B.6.2 Style-of-faulting**

The style-of-faulting is assumed to be reverse.

### **B.6.3 Characteristic Earthquake Magnitude**

Using the SCEC CF model, the length of the Compton Thrust is about 70 km. The width of the Compton Thrust varies along its strike. The average downdip width is 15 km. Using the three magnitude-area relations discussed in section 3.1 results in characteristic magnitudes of 7.1 to 7.2 with weights of 0.67 and 0.33, respectively.

### **B.6.4 Recurrence**

Figure B-9 shows the recurrence relationships for the Compton Thrust.

## **B.7 LOS ALAMITOS FAULT**

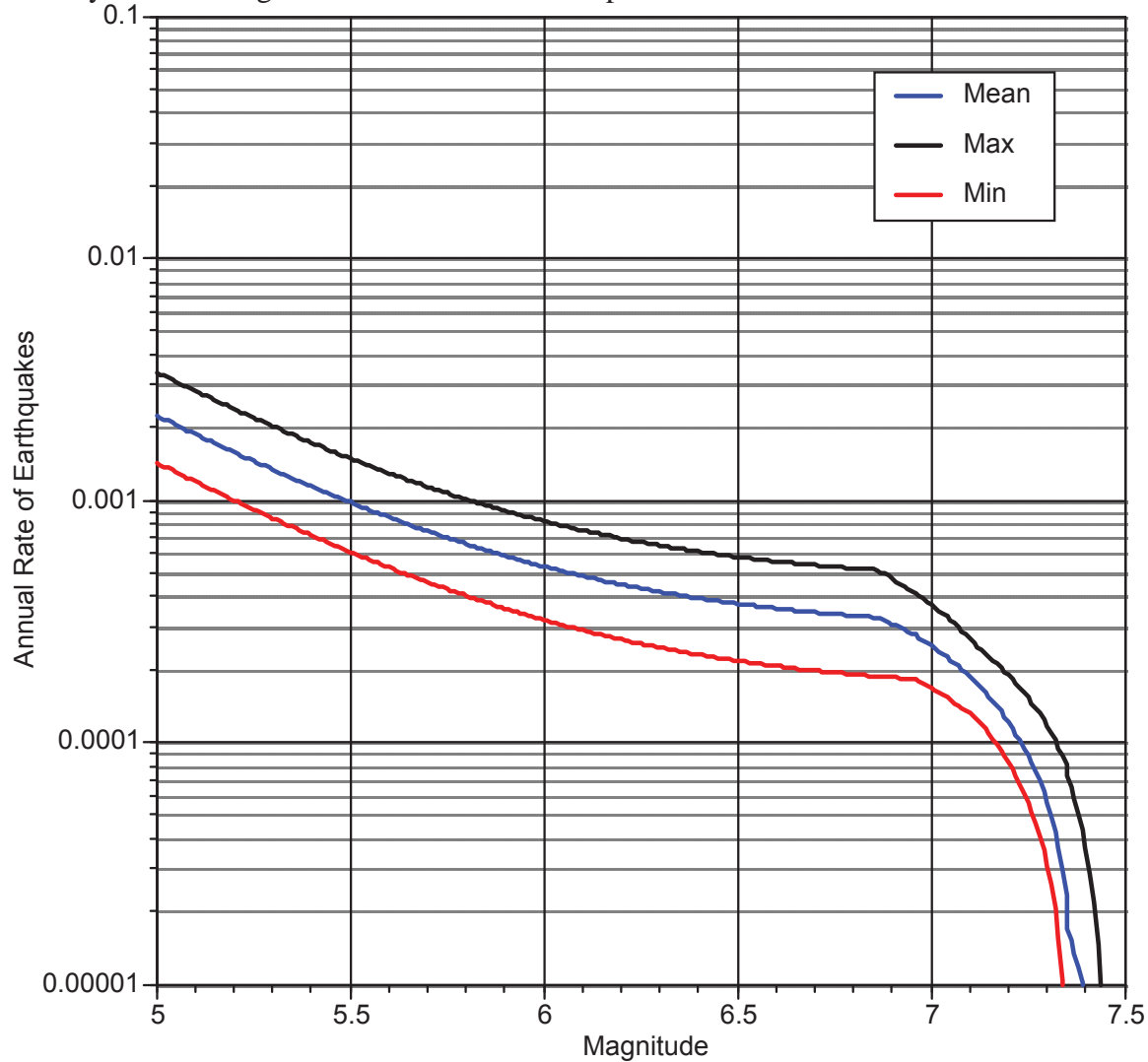
The Los Alamos fault is a northwest-southeast trending subsurface fault along the northeast side of the NISZ (refer to Figures 2-1 and 3-1). The fault offsets Quaternary-age strata which combined with the seismicity in the area indicates an active fault. The length of the fault is about 40 km.

### **B.7.1 Slip-rate**

The slip rate is unknown as is the earthquake recurrence interval. Because the Los Alamos fault is a much smaller feature than the main NISZ fault, the slip-rate was assumed to be less. The slip-rate is assumed to be 0.25 mm/yr to 0.5 mm/yr with equal weights, based on the fault's association with the NISZ which has a minimum slip-rate of about 0.5 mm/yr.

### B.7.2 Style-of-faulting

The style-of-faulting is assumed to be strike-slip.



**Figure B-9. Recurrence for the Compton Thrust (Assuming that it is Active)**

### B.7.3 Characteristic Magnitude

If the fault width of the Los Alamitos fault is assumed to be the same as the Newport-Inglewood fault, the mean characteristic earthquake magnitude based on the magnitude-area scaling relations would be 6.7 to 7.0; however, earthquake of this size would likely occur on the more active Newport-Inglewood fault. Therefore, the mean characteristic magnitude for the Los Alamitos fault is assumed to be 6.5.

### B.7.4 Recurrence

Figure B-10 shows the recurrence relationship for the Los Alamitos fault.

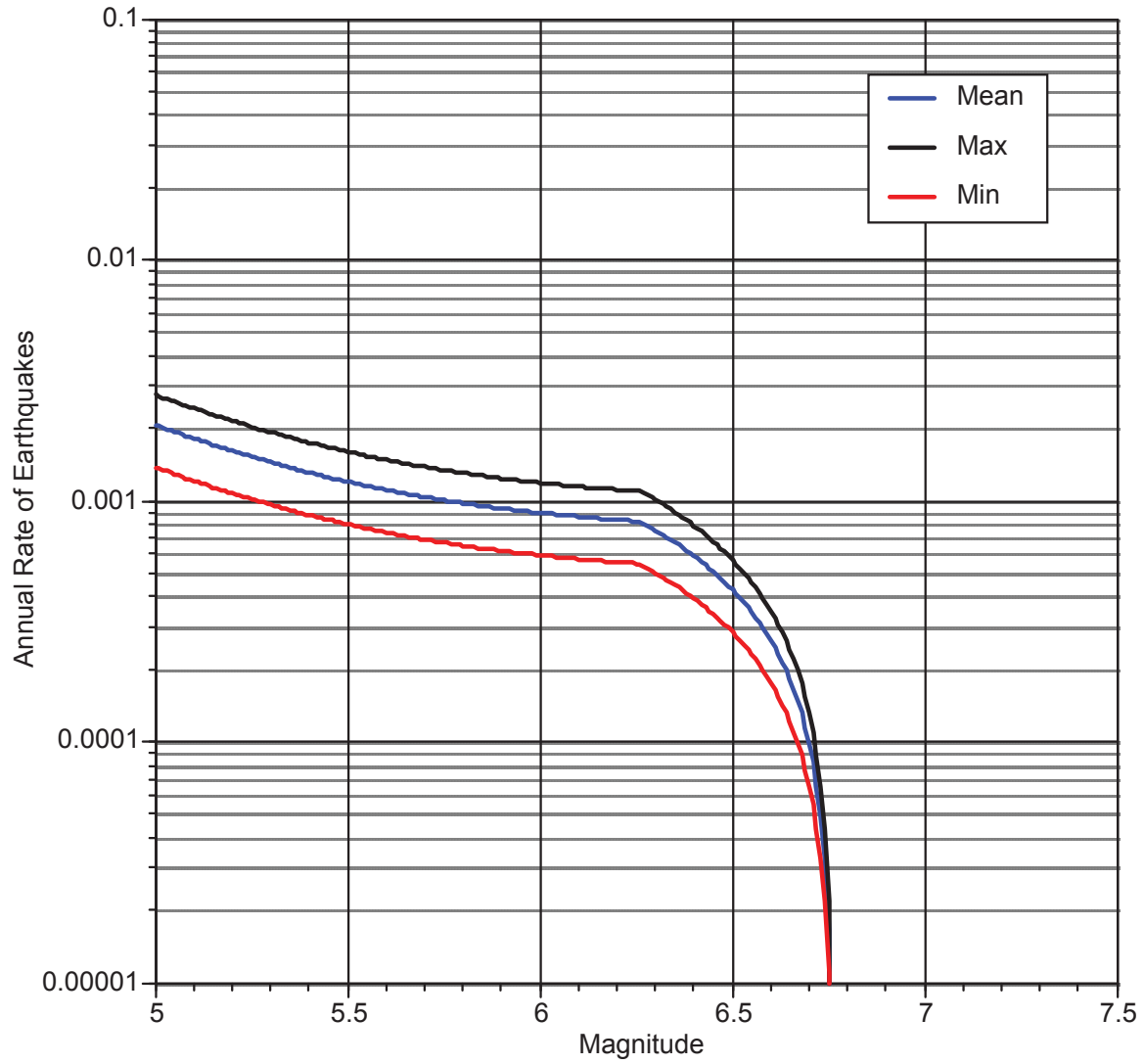


Figure B-10. Recurrence for the Los Alamitos Fault

# APPENDIX C

## Details on Probabilistic Seismic Hazard Assessment

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# APPENDIX C

## DETAILS ON PROBABILISTIC SEISMIC HAZARD ASSESSMENT

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## APPENDIX C

# DETAILS ON PROBABILISTIC SEISMIC HAZARD ASSESSMENT

### C.1 MATHEMATICAL FORMULATION

The probabilistic seismic hazard analysis follows the standard approach first developed by Cornell (1968). The main change from the original work is that more parameters are randomized (a more complete description of the aleatory variables) and epistemic uncertainty is considered. In particular, the aleatory variability in the ground motion was not considered in the original work. The ground motion aleatory variability has a large effect on the hazard and can not be ignored.

The basic methodology involves computing how often a specified level of ground motion will be exceeded at the site. The hazard analysis computes the annual number of events that produce a ground motion parameter  $A$  that exceeds a specified level “ $a$ ”. This number of events per year  $v$  is also called the “annual frequency of exceedance”. The inverse of  $v$  is called the “return period”.

The calculation of the annual frequency of exceedance  $v$  involves the rate of earthquakes of various magnitudes, the rupture dimension of the earthquakes, the location of the earthquakes relative to the site, and the attenuation of the ground motion from the earthquake rupture to the site.

The annual rate of events from the  $i^{th}$  source that produce ground motions that exceed “ $a$ ” at the site is the product of the probability that the ground motion exceeds the test value given that an earthquake has occurred on the  $i^{th}$  source and the annual rate of events with magnitude greater than  $m_{min}$  on the  $i^{th}$  source.

$$v_i(A > a) = N_i(m_{min})P_i(A > a | E_i(m > m_{min})) \quad (C-1)$$

where  $N_i(m_{min})$  is the annual number of events with magnitude greater than  $m_{min}$  on the  $i^{th}$  source and  $E_i(m_{min})$  indicates that an event with magnitude  $\geq m_{min}$  has occurred on the  $i^{th}$  source.

For multiple seismic sources, the total annual rate of events with ground motions that exceed  $z$  at the site is just the sum of the annual rate of events from the individual sources (assuming that the sources are independent).

$$v(A > a) = \int_{i=1}^{N_{source}} v_i(A > a) \quad (C-2)$$

### C.1.1 Hazard for Fault Sources

Fault sources are modeled by multiple-planes, which allows changing the strike of the fault. For planar sources (e.g. known faults), we need to consider the finite dimension and location of the rupture in order to compute the closest distance. Specifically, we need to randomize the rupture length, rupture width, rupture location along strike, rupture location down dip, and hypocenter location along the rupture length (for strike-slip faults). Since rupture width and length are correlated, it is easier to consider the rupture area and rupture width and then back calculate the rupture length.

The general form of the conditional probability for the  $i^{\text{th}}$  fault is given by

$$P_i(A > a | E_i(m \geq m_{\min})) = \left\{ \begin{array}{l} \int_{RA=0}^{\infty} \int_{RW=0}^{\infty} \int_{Ex=0}^1 \int_{Ey=0}^1 \int_{x=0}^1 \int_{m=M_{\min}}^{M_{\max}} f_{m_i}(m) f_{RA_i}(m) f_{RW_i}(m) f_{Ex_i}(Ex) f_{Ey_i}(Ey) f_{x_i}(x) \dots \\ \dots P_i(A > a | m, r(Ex, Ey, RA, RW), x) dm dx dEy dEx dRW dRA \end{array} \right. \quad (\text{C-3})$$

where  $f_{RW}(m)$ ,  $f_{RA}(m)$ ,  $f_{Ex}(Ex)$ ,  $f_{Ey}(Ey)$ ,  $f_x(x)$ , and  $f_m(m)$  are probability density functions for the rupture width, rupture area, rupture location along strike, rupture location down dip, hypocenter location in the rupture plane, and magnitude, respectively. The models used for these probability density functions are described later.

For the fault normal component (FN), the probability of exceeding the ground motion “ $a$ ” for a given magnitude,  $m$ , and closest distance,  $r$ , and hypocenter location,  $x$ , is given by

$$P(A > a | m, r, x) = 1 - \Phi \left( \frac{\ln(a) - \ln(Sa_{FN}(m, r, x))}{\sigma(m)} \right) \quad (\text{C-4})$$

where  $Sa(m, r, x)$  and  $\sigma(m)$  are the median and standard deviation of the ground motion from the attenuation relations for the fault normal component as described later in Section C.1.8, and  $\Phi()$  is the normal probability integral given by

$$\Phi(z) = \int_{-\infty}^z \frac{1}{\sqrt{2\pi}} e^{-u^2/2} du \quad (\text{C-5})$$

#### C.1.1.1 Probability of Exceedance

The annual rate of events given in Eq. (C-2) is not probability; it can exceed 1. To convert the annual rate of events to a probability, we consider the probability that the ground motion exceeds test level “ $a$ ” at least once during a specified time interval.

At this step, a common assumption is that the occurrence of earthquakes is a Poisson process. That is, there is no memory of past earthquakes, so the chance of an earthquake occurring in a



given year does not depend on how long it has been since the last earthquake (non-Poisson models are discussed later). If the occurrence of earthquakes is a Poisson process then the occurrence of peak ground motions is also a Poisson process. For a Poisson process, the probability of an event (e.g. ground motion exceeding a level  $z$ ) occurring  $n$  times in time interval  $t$  is given by

$$p_n(t) = \exp(-vt) (vt)^n/n! \quad (C-6)$$

The probability that at least one event occurs (e.g.  $n \geq 1$ ) is 1 minus the probability that no events occur:

$$P(n \geq 1, t) = 1 - p_0(t) = 1 - \exp(-vt) \quad (C-7)$$

So the probability of at least one occurrence of ground motion level  $z$  in  $t$  years is given by

$$P(A > a, t) = 1 - \exp(-v(A > a)t) \quad (C-8)$$

For  $t=1$  year, this probability is the annual hazard.

### C.1.2 Aleatory and Epistemic Uncertainty

The basic part of the hazard calculation is computing the integrals in Eq. (C-3). All of the aleatory variables are inside of the hazard integral. The randomness of the seismic source variables is characterized by the probability density functions which are discussed below. The randomness of the attenuation relation is accounted for in the probability of exceeding the ground motion “ $a$ ”, for a given magnitude and closest distance.

Epistemic (scientific) uncertainty is considered by using alternative models and/or parameter values for the probability density functions, attenuation relation, and activity rate. For each alternative model, we recalculate the hazard and compute alternative hazard curves. Epistemic uncertainty is typically handled using a logic tree approach for specifying the alternative models for the density function, attenuation relation, and activity rates.

### C.1.3 Activity Rate

There are two approaches to estimating the fault activity rate: historical seismicity and geologic (and geodetic) information.

If historical seismicity catalogs are used to estimate the activity rate, then the estimate of  $N(m^L)$  is usually based on fitting the truncated exponential model (discussed below) to the historical data. Maximum likelihood procedures are generally preferred over least-squares for estimating the activity rate and the b-value.

When using geologic information on slip-rates of faults, the activity rate is computed by balancing the energy build-up estimated from geologic evidence with the total energy release of earthquakes. Knowing the dimension of the fault, the slip-rate, and the rigidity of the fault, we

can balance the long term seismic moment so that the fault is in equilibrium (e.g., Youngs and Coppersmith, 1985).

The seismic energy release is balanced by requiring the build up of seismic moment to be equal to the release of seismic moment in earthquakes. The build up of seismic moment is computed from the long term slip-rate. The seismic moment,  $M_o$  (in dyne cm), is given by

$$M_o = \mu A D \quad (C-9)$$

where  $\mu$  is the rigidity of the crust,  $A$  is the area of the fault (in  $\text{cm}^2$ ), and  $D$  is the average displacement (slip) on the fault surface (in cm).

The annual rate of build up of seismic moment is given by

$$M_o = \mu A S \quad (C-10)$$

where  $S$  is the slip-rate in cm/year.

The seismic moment released during an earthquake is given by

$$\log_{10} M_o = 1.5 m + 16.05 \quad (C-11)$$

where  $m$  is the moment magnitude of the earthquake.

To balance the moment build up and the moment release, the annual moment rate from the slip-rate is set equal to the sum of the moment released in all of the earthquakes that are expected to occur each year:

$$\mu AS = N(m^L) \int_{m=m^L}^{m^U} f_m(m) 10^{(1.5m + 16.05)} dm \quad (C-12)$$

Given the slip-rate, fault area, and magnitude density function, the activity rate,  $N(m^L)$  is given by:

$$N(m^L) = \frac{\mu AS}{\int_{m=m^L}^{m^U} f_m(m) 10^{(1.5m + 16.05)} dm} \quad (C-13)$$

#### C.1.4 Magnitude Density Distribution

The magnitude density distribution describes the relative number of large magnitude and moderate magnitude events that occur on the seismic source. Two alternative magnitude density functions are considered: the truncated exponential model and the characteristic model.

The truncated exponential model is the standard Gutenberg-Richter model that is truncated at the minimum and maximum magnitudes and renormalized so that it integrates to unity. The density function for the truncated exponential model is given by

$$f_m(m) = \frac{\beta \exp(-\beta(m-m^L))}{1-\beta \exp(-\beta(m^U-m^L))} \quad (C-14)$$

where  $\beta$  is  $\ln(10)$  times the  $b$ -value. Regional estimates of the  $b$ -value are usually used with this model.

The characteristic model assumes that more of the seismic energy is released in large magnitude events than for the truncated exponential model. That is, there are fewer small magnitude events for every large magnitude event for the characteristic model than for the truncated exponential model. There are different models for the characteristic model. Two commonly used models are the “characteristic model” as defined by Youngs and Coppersmith (1985) and the “maximum magnitude” characteristic model.

The density function for the generalized form of the Youngs and Coppersmith characteristic model is given by

$$f_m(m) = \begin{cases} \frac{\beta \exp(-\beta(m-m^L))}{1-\beta \exp(-\beta(m^U-\Delta m_2-m^L))} \frac{1}{1+c} & \dots \text{for } m < m^U - \Delta m_2 \\ \frac{\beta \exp(-\beta(m^U-\Delta m_1-\Delta m_2-m^L))}{1-\beta \exp(-\beta(m^U-\Delta m_2-m^L))} \frac{1}{1+c} & \dots \text{for } m \geq m^U - \Delta m_2 \end{cases} \quad (C-15)$$

where

$$c = \frac{\beta \exp(-\beta(m^U-\Delta m_1-\Delta m_2-m^L))}{1-\beta \exp(-\beta(m^U-\Delta m_2-m^L))} \Delta m_2 \quad (C-16)$$

The density function for this model is shown in Figure C-1. In the Youngs and Coppersmith model,  $\Delta m_1=1.0$  and  $\Delta m_2=0.5$ .

Comparing the examples of the truncated exponential and characteristic density functions shown in Figure C-1, we see that the density functions themselves are similar at small magnitudes. However, when the geologic moment-rate is used to set the annual rate of events,  $N(m^L)$ , then there is a large impact on  $N(m^L)$  depending on the selection of the magnitude density function. Figure C-2 shows the comparison of the magnitude recurrence relation for the truncated exponential and characteristic models (using the Youngs and Coppersmith value for  $\Delta m_1$  and  $\Delta m_2$ ) when they are constrained to have the same total moment rate. The characteristic model has many fewer moderate magnitude events than the truncated exponential model (about a factor of 10 difference).

Recent studies have found that the characteristic model does a better job of matching observed seismicity than the truncated exponential (Geomatrix, 1992; Woodward-Clyde, 1994) when the total moment rate is constrained by the geologic slip-rate.

### C.1.5 Rupture Dimension Density Functions

For the rupture area and rupture width, the density functions are determined from regression models which give the rupture area and rupture width as a function of magnitude. For this project, the Wells and Coppersmith (1994) empirical models for rupture area and rupture width are used:

$$\log_{10}(\text{RA}) = -3.49 + 0.91 m \pm 0.24 \quad (\text{C-17})$$

$$\log_{10}(\text{W}) = -1.01 + 0.32 m \pm 0.15 \quad (\text{C-18})$$

where  $m$  is the magnitude. The density functions,  $f_{\text{RA}}(m)$  and  $f_{\text{RW}}(m)$  are log-normal distributions centered about the median values given by Eq. (C-15) and (C-16). These distributions are truncated at  $\pm 2\sigma$  in the hazard calculations.

### C.1.6 Rupture Location Density Functions

The center of the rupture location is parameterized in terms of the normalized fault length and fault width.  $E_x$  is the fraction of the fault length (measure along strike) and  $E_y$  is the fraction of the fault width (measured down dip). The location of the center of the rupture plane is assumed to be uniformly distributed over the fault plane. The resulting density functions for  $f_{E_x}(E_x)$  and  $f_{E_y}(E_y)$  are unity.

### C.1.7 Hypocenter Location Density Function

For a given rupture dimension (length and width) and rupture location, the location of the hypocenter along strike is parameterized in terms of the normalized rupture length. The location of the hypocenter is assumed to be uniformly distributed over the rupture plane. The resulting density function for  $f_x(x)$  is unity. In the hazard analysis, a total of 10 hypocenter locations evenly spaced along the rupture length are used for each magnitude, rupture location, and rupture dimension.

### C.1.8 Directivity Effects Model

The empirical attenuation relations were developed for the average horizontal component without regard to the direction of rupture. Somerville et al. (1997) developed an empirically based model quantifying the effects of rupture directivity on horizontal response spectra that can be used to scale the average horizontal component from attenuation relations. There are two effects of rupture directivity on long period response spectral values that are modeled by Somerville. First, there is an increase in the average horizontal component for cases of rupture coming toward the site and there is a decrease in the average horizontal motion for rupture running away from the site. Second, there is a systematic difference in the two horizontal components of motion when they are oriented parallel and perpendicular to the strike of the fault. At long periods, the fault normal component is larger than the fault parallel component. This increase in the fault normal component has also been studied by Geomatrix (1995).

In this project, a modified form of the Somerville et al. (1997) model has been used to characterize the two parts of the directivity effect.

### C.1.8.1 Somerville et al. (1997) Model

Somerville et al. (1997) provides scale factors to account for directivity effects for the horizontal components. The Somerville et al. model for the difference in the two horizontal components (fault normal and fault parallel) for strike-slip earthquakes is given by

$$\ln\left(\frac{FN}{Ave H}\right) = \begin{cases} \cos(2\phi) [C_1 + C_2 \ln(r + 1 \text{ km}) + C_3 (m - 6)] & \text{for } m > 6 \text{ and } \phi < 45^\circ \\ 0 & \text{otherwise} \end{cases} \quad (C-19)$$

where *Ave H* is the average horizontal component,  $\phi$  is the azimuth angle from the epicenter to the station, and  $r$  is the rupture distance. The coefficients  $C_1$ ,  $C_2$  and  $C_3$  are listed in Table C-1. This model is used without modification in this study.

Somerville et al. also provides a model for the effect of rupture direction on the average horizontal component. This model was modified for use on this project as described below.

### C.1.8.2 Modifications of the Somerville et al. (1997) Model

There are several aspects of the empirical model for the average horizontal component scale factors developed by Somerville et al. that needed to be modified to make the model applicable to a probabilistic hazard analysis.

#### (A) Distance Dependence

As published, the model is independent of distance. The data set used in the analysis includes recordings at distances of 0 to 50 km. A distance-dependent taper function was applied to the model that reduces the effect to zero for distances greater than 60 km:

$$T_d(r) = \begin{cases} 1 & \text{for } r < 30 \text{ km} \\ 1 - \frac{r-30}{30} & \text{for } 30 \text{ km} < r < 60 \text{ km} \\ 0 & \text{for } r > 60 \text{ km} \end{cases} \quad (C-20)$$

#### (B) Magnitude Dependence

As published, the model is applicable to magnitudes greater than 6.5. A magnitude taper was applied that reduces the effect to zero for magnitudes less than 6.0:

$$T_m(m) = \begin{cases} 1 & \text{for } m < 6.5 \\ 1 - \frac{m-6.5}{0.5} & \text{for } 6 < m < 6.5 \\ 0 & \text{for } m < 6 \end{cases} \quad (C-21)$$

### (C) Saturation of Directivity with $x \cdot \cos \theta$

The empirical model uses a form that increases a constant rate as  $x$  increases from 0 to 1. There is little empirical data with  $x \cdot \cos \theta$  values greater than 0.6, particularly for rupture distances less than 20 km. The short-distance data suggest that there may be a saturation of the directivity effect as a function of  $x \cdot \cos \theta$ . The extrapolation of the model to larger  $x \cdot \cos \theta$  values is not well constrained. To evaluate this extrapolation, three separate groups applied their seismological numerical modeling methods to generate synthetic time histories for a range of  $x \cdot \cos \theta$  values. The numerical modeling results indicated that the directivity effect saturates for  $x \cdot \cos \theta > 0.4$ . As a result, the functional form of the directivity model was changed to include saturation with  $x \cdot \cos \theta$ . The coefficients of the model were based on the empirical data, and not on the synthetics.

Based on the trends in the numerical simulations, the form of the directivity function is modified to reach a maximum at  $x \cdot \cos \theta = 0.4$ . The model was developed for a spectral period of 3 sec. The slope is greater than the Somerville et al. model, but it flattens out at a lower level. The hazard calculation is sensitive to the model values at large  $x \cdot \cos \theta$  (say greater than 0.9) so this change results in a reduction of the ground motion.

The  $T = 3$  sec value is used to guide the adjustment of the model at all periods. The resulting model is given by

$$y_{\text{Dir}}(x, \theta, T) = \begin{cases} C_1(T) + 1.88 C_2(T) \cdot x \cdot \cos \theta & \text{for } x \cdot \cos \theta = 0.4 \\ C_1(T) + 0.75 C_2(T) & \text{for } x \cdot \cos \theta > 0.4 \end{cases} \quad (\text{C-22})$$

where  $C_1(T)$  and  $C_2(T)$  are the coefficients from Somerville et al. and are listed in Table C-2.

#### C.1.8.3 Reduction of the Standard Deviation

Including the directivity effect should result in a reduction of the standard deviation of the attenuation relation. The standard deviation of the data within 20 km of distance including the directivity was compared to the standard deviation of the published model. At  $T = 3$  sec, there is a reduction of about 0.05 natural log units. The period dependence of the reduction is approximated by the period dependence of the slope of the directivity effect. To account for the reduction in the standard deviation due to including the directivity effect as part of the model, the standard deviations for the published attenuation relations were modified for use in the hazard analysis using the following relation:

$$\sigma'(m, T) = \sigma(m, T) - 0.05 C_2(T) / 1.333 \quad (\text{C-23})$$

where  $C_2(T)$  is given in Table C-1.

#### C.1.8.4 Final Directivity Model

The following model is used for the average horizontal component for strike-slip faults

$$\ln Sa_{dir}(m,r,x,\theta,T) = \ln Sa(m,r) + y_{Dir}(x,\theta,T) T_d(r) T_m(m) \quad (C-24)$$

where  $Sa(m,r)$  is an empirical attenuation relation without directivity.

**Table C-1. Coefficients for Somerville et al. (1997) Model**

Period (sec)	$C_1$	$C_2$	$C_3$
0.60	0.000	0.0000	0.000
0.75	0.061	-0.0155	0.000
1.00	0.104	-0.0255	0.000
1.50	0.164	-0.0490	0.034
2.00	0.207	-0.0613	0.059
3.00	0.353	-0.1007	0.093
4.00	0.456	-0.1282	0.118
5.00	0.450	-0.1269	0.137

**Table C-2. Period-Dependent Coefficients for Modified Somerville et al. (1997) Model**

Period (sec)	Strike-Slip		Dip-Slip	
	$C_1(T)$	$C_2(T)$	$C_1(T)$	$C_2(T)$
0.60	0.000	0.000	0.000	0.000
0.75	-0.084	0.185	-0.045	0.008
1.00	-0.192	0.423	-0.104	0.178
1.50	-0.344	0.759	-0.186	0.318
2.00	-0.452	0.998	-0.245	0.418
3.00	-0.605	1.333	-0.327	0.559
4.00	-0.713	1.571	-0.386	0.659
5.00	-0.797	1.757	-0.431	0.737

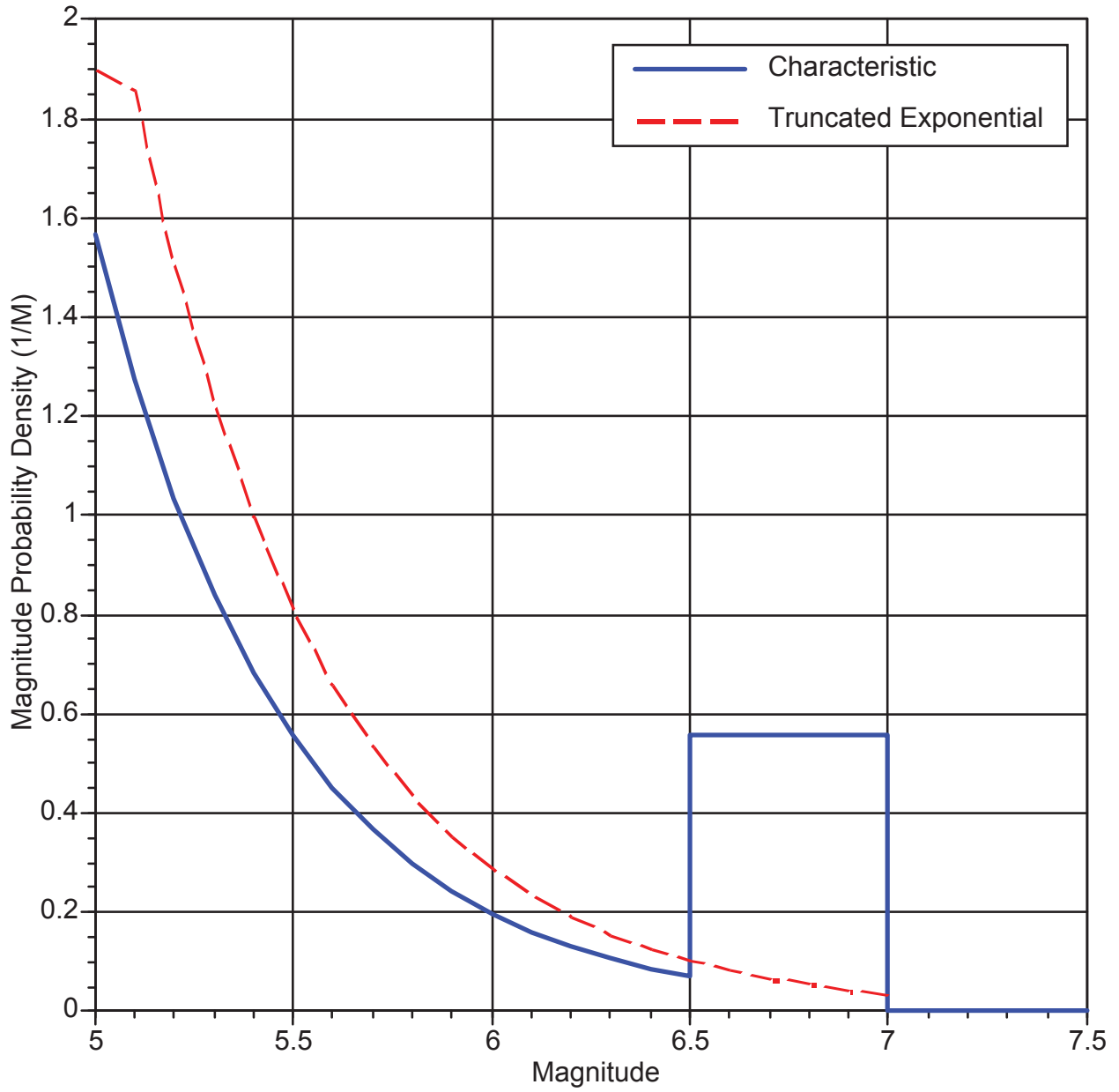
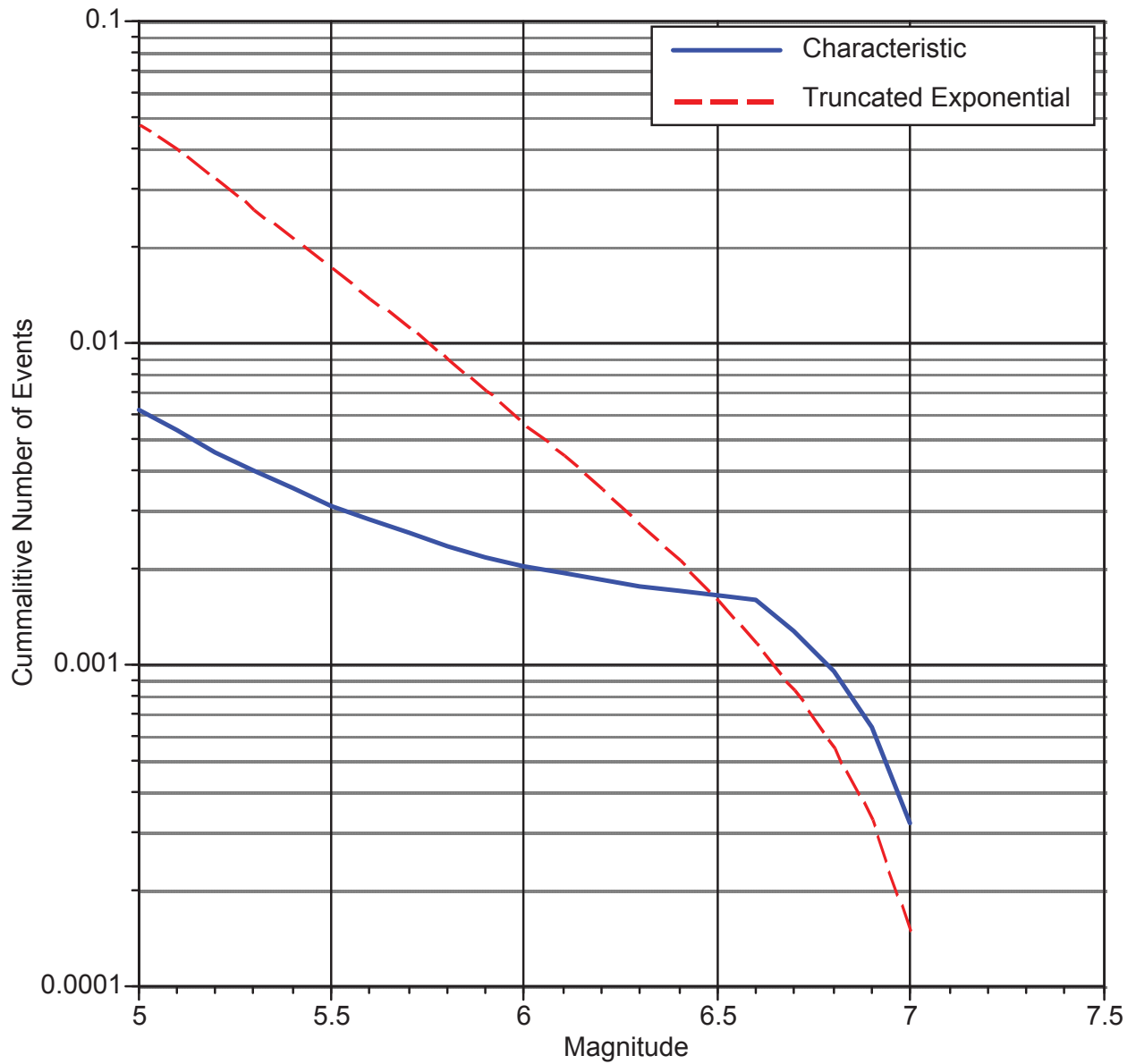


Figure C-1. Density Function for Truncated Exponential and Characteristic Models





**Figure C-2. Density Function for Truncated Exponential (GR) and Characteristic Models (Youngs and Coppersmith)**

## C.2 ABRAHAMSON AND SILVA (2005) ATTENUATION MODEL A

As part of the current revision of empirical ground motion attenuation models for shallow crustal earthquakes being performed for the PEER/Lifelines Next Generation Attenuation project, the Abrahamson and Silva (1997) attenuation model is being updated. This update is based upon the inclusion of more recently recorded strong ground motion data, especially for larger magnitude events such as: 1999 Kocaeli (M7.5), 1999 Chi-Chi (M7.6), 1999 Duzce (M7.1), 2000 Hector Mine (M7.1), and 2002 Denali (M7.9) earthquakes.

The updated version of the Abrahamson and Silva attenuation model, identified as Model A, that was used in the PSHA is described as follows:

$$\begin{aligned}
 \ln(Sa) = & C_1(T) + (C_2(T) + C_3(T) \cdot (7.5 - M)) \cdot \ln(R) + C_9(T) \cdot (8.5 - M)^2 + b_5(T) \cdot M \\
 & + C_6(T) \cdot (\ln(AR) - \ln(1.5)) \cdot \text{Taper}(M) \\
 & + HW(T, M, r_{jb}) \\
 & + C_5(T) \cdot F \\
 & + \text{SoilAmp}(T, PGA_{rock}, V_{s30m}) \\
 & + \text{Sigma}(T, PGA_{rock}, V_{s30m})
 \end{aligned} \tag{C-25}$$

where

- $Sa$  = soil amplitude,
- $T$  = period,
- $C_i$  = regression coefficients listed in Table C-3,
- $M$  = moment magnitude,
- $AR$  = aspect ratio (i.e., fault length divided by fault width)
- $r_{jb}$  = Joyner-Boore distance,
- $\text{Taper}()$  = taper function (see below),
- $HW()$  = hanging wall/foot wall effect (see below),
- $F$  = fault mechanism (see below),
- $\text{SoilAmp}()$  = soil amplification function (see below), and
- $\text{Sigma}()$  = standard deviation in natural log units (see below).

The  $R$  parameter is defined as

$$R = \sqrt{r_{rup}^2 + h(T)^2} \tag{C-26}$$

where

- $r_{rup}$  = rupture distance, and
- $h(T)$  = fictitious depth term.

The *Taper* function is defined as

$$Taper(M) = \begin{cases} 1.0 & \text{for } M \geq 7.0 \\ (M - 6.5)^2 & \text{for } 7.0 > M > 6.5 \\ 0.0 & \text{for } M \leq 6.5 \end{cases} \quad (C-27)$$

The *HW* hanging wall/foot wall function is defined by

$$HW(T, M, r_{jb}) = \frac{C_7(T)(30.0 - r_{jb})}{30.0} \cdot \frac{(90.0 - Dip)}{45.0} \cdot Taper2(M) \quad (C-28)$$

where *Dip* is the dip angle of the fault and *Taper2*(*M*) is defined as

$$Taper2(M) = \begin{cases} 1.0 & \text{for } M \geq 6.5 \\ (M - 6.0)^2 & \text{for } 6.0 > M > 6.5 \\ 0.0 & \text{for } M \leq 6.0 \end{cases} \quad (C-29)$$

The mechanism term, *F*, is defined as follows based on the *Rake* angle of the fault:

$$F = \begin{cases} 1.0 & \text{for } 157.5 > Rake > 22.5 \\ 0.0 & \text{otherwise} \end{cases} \quad (C-30)$$

The *SoilAmp* function is defined as

$$SoilAmp(T, PGA_{rock}, V_{s30m}) = \begin{cases} C_8(T) * Ln\left(\frac{V_{s30m}}{V_{sref}(T)}\right) - b_{soil}(T) * Ln(1.0 + PGA_{rock}) \\ \quad + b_{soil}(T) * Ln\left(PGA_{rock} + \frac{V_{s30m}}{V_{sref}(T)}\right) & \text{if } V_{s30m} < V_{sref}(T) \\ C_8(T) * Ln\left(\frac{V_{s30m}}{V_{sref}(T)}\right) \\ \quad + b_{soil}(T) * Ln\left(PGA_{rock} + \frac{V_{s30m}}{V_{sref}(T)}\right) & \text{if } V_{s30m} \geq V_{sref}(T) \end{cases} \quad (C-31)$$

The standard deviation  $\sigma$  is defined as

$$\sigma(T, PGA_{rock}, V_{s30m}) = \sqrt{\sigma_0^2(T) + \tau^2(T, PGA_{rock}, V_{s30m})} \quad (C-32)$$

where the function  $\tau$  is defined as

$$\tau(T, PGA_{rock}, V_{s30m}) = \sqrt{\tau_0^2(T) + \left( \frac{\partial \text{Amp}}{\partial PGA_{rock}} \tau_0(PGA) \right)^2 + 2.0 \frac{\partial \text{Amp}}{\partial PGA_{rock}} \tau_0(PGA) \cdot \tau_0(T) \cdot \tau_{\text{Corr}}(T)} \quad (C-33)$$

and  $\frac{\partial \text{Amp}}{\partial PGA_{rock}}$  is the partial derivative of the natural log of the soil amplitude function with respect to the natural log of the rock PGA:

$$\frac{\partial \text{Amp}}{\partial PGA_{rock}} = \begin{cases} b_{\text{soil}}(T) \cdot PGA_{rock} \cdot \left( \frac{-1.0}{PGA_{rock} + 1.0} + \frac{1.0}{PGA_{rock} + \frac{V_{s30m}}{V_{sref}(T)}} \right) & \text{for } V_{s30m} \geq V_{sref} \\ 0.0 & \text{otherwise} \end{cases} \quad (C-34)$$

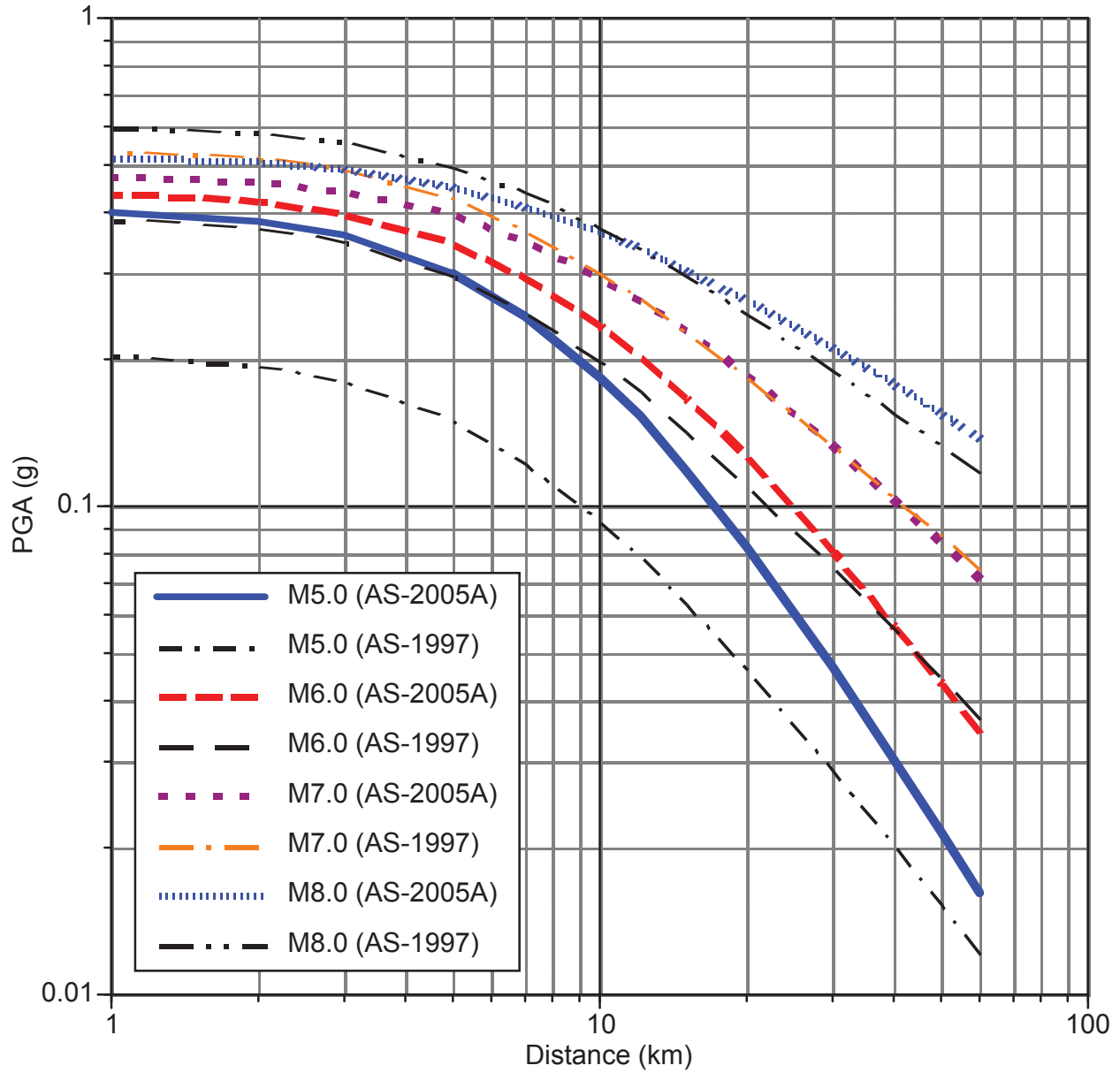
Figure C-1 compares the PGA attenuation from the Abrahamson and Silva (1997) model and the Abrahamson and Silva (2005) Model A for various magnitudes for soil site conditions. Figure C-4 compares the PGA standard deviation for the two models.

**Table C-3. Regression Coefficients for Abrahamson and Silva (2005) Model A Attenuation Relationship**

Period (sec)	$C_1$	$C_2$	$C_3$	$C_5$	$C_6$	$C_7$	$C_8$	$C_9$
0.00	3.53968	-0.95816	-0.26582	-0.33482	0.23408	-0.11054	0.28921	1.10778
0.02	3.61720	-0.97279	-0.25914	-0.32791	0.22547	-0.11688	0.29881	1.11124
0.05	3.94594	-1.05038	-0.26528	-0.34222	0.20355	-0.13165	0.45107	0.96458
0.10	4.65586	-1.15893	-0.26847	-0.35539	0.18006	-0.09028	0.23222	1.07856
0.15	5.02847	-1.17720	-0.25380	-0.33600	0.18351	-0.10018	0.12074	1.33755
0.20	5.03419	-1.13190	-0.22514	-0.30182	0.18910	-0.10696	0.08913	1.52918
0.30	4.57992	-0.99576	-0.22129	-0.27420	0.21559	-0.12811	0.21979	1.72303
0.40	4.38899	-0.94736	-0.21967	-0.24511	0.16301	-0.12282	0.21393	1.77987
0.50	4.25542	-0.91351	-0.22353	-0.24806	0.14975	-0.16275	0.27339	1.75103
0.75	3.47103	-0.76506	-0.24911	-0.26812	0.13947	-0.17326	0.29806	1.57877
1.00	3.37820	-0.75555	-0.25551	-0.26037	0.12270	-0.17149	0.30612	1.30057
1.50	3.12468	-0.75604	-0.20759	-0.16908	0.04234	-0.10429	-0.01350	0.73224
2.00	2.73061	-0.74427	-0.18515	-0.11108	0.02164	-0.07017	0.27184	0.29305
3.00	2.62683	-0.80779	-0.20086	-0.09146	0.00814	-0.11400	0.13396	-0.38835
4.00	2.46375	-0.83260	-0.14711	-0.03425	-0.07395	-0.02066	0.16311	-1.03567

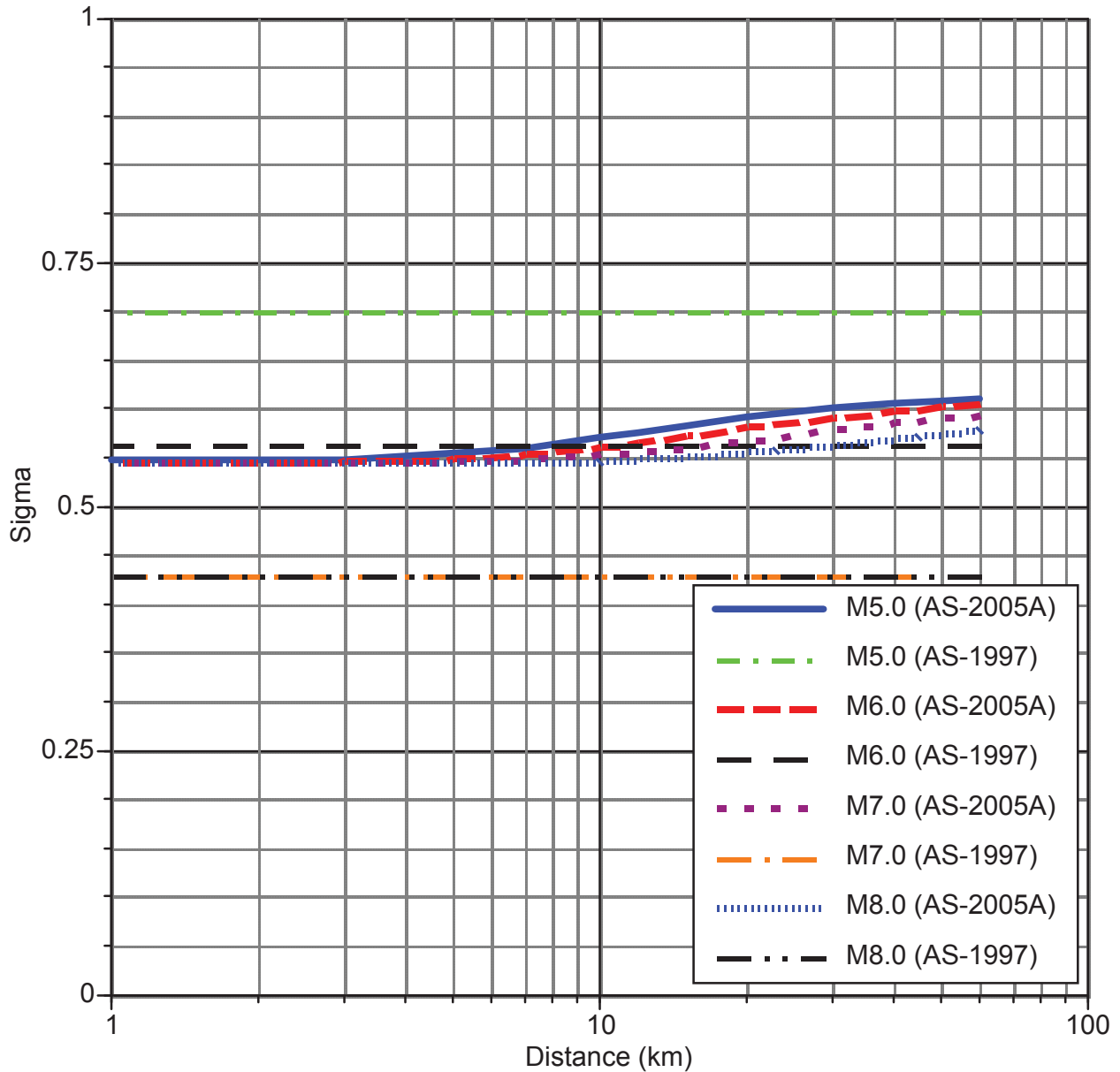
**Table C-3 (Cont.)**

Period (sec)	$h$	$b_{soil}$	$Sigma_0$	$tau_0$	$V_{sref}$	$b_5$	$tauCorr$
0.00	5.4	-1.65	0.506	0.349	855	-0.31	1.00
0.02	5.4	-1.65	0.506	0.351	855	-0.31	0.99
0.05	5.3	-1.49	0.521	0.411	1150	-0.31	0.95
0.10	6.4	-1.61	0.545	0.451	1265	-0.31	0.92
0.15	6.9	-1.88	0.540	0.443	1140	-0.31	0.92
0.20	6.8	-2.10	0.537	0.391	990	-0.31	0.92
0.30	5.4	-2.35	0.545	0.328	786	-0.31	0.89
0.40	5.2	-2.44	0.547	0.348	674	-0.31	0.85
0.50	5.2	-2.44	0.562	0.349	601	-0.31	0.82
0.75	4.0	-2.28	0.586	0.333	515	-0.31	0.68
1.00	4.4	-2.06	0.604	0.344	445	-0.31	0.57
1.50	3.9	-1.60	0.618	0.340	400	-0.31	0.45
2.00	3.8	-1.21	0.616	0.369	400	-0.31	0.28
3.00	5.2	-0.50	0.569	0.378	400	-0.31	0.28
4.00	6.4	0.20	0.577	0.354	400	-0.31	0.17



Note: For the Abrahamson and Silva (2005) Model A:  
 $V_{s30m}=300\text{m/sec}$ , Aspect Ratio=1.5, Dip=90°, Strike-slip fault.

**Figure C-3. Comparison of PGA Attenuation Models for M=5, 6, 7, and 8 for Abrahamson and Silva (1997) and Abrahamson and Silva (2005) Model A for Soil Site Conditions**



Note: For the Abrahamson and Silva (2005) Model A:  
 $V_{s30m}=300\text{m/sec}$ , Aspect Ratio=1.5, Dip=90°, Strike-slip fault.

**Figure C-4. Comparison of PGA Sigma Models for M=5, 6, 7, and 8 for Abrahamson and Silva (1997) and Abrahamson and Silva (2005) Model A for Soil Site Conditions**

# APPENDIX D

## Spectrum-Compatible Time Histories

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# APPENDIX D

## SPECTRUM-COMPATIBLE TIME HISTORIES

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## APPENDIX D SPECTRUM-COMPATIBLE TIME HISTORIES

### D.1 FIRM-GROUND TIME HISTORIES COMPATIBLE TO CLE FIRM-GROUND SPECTRA

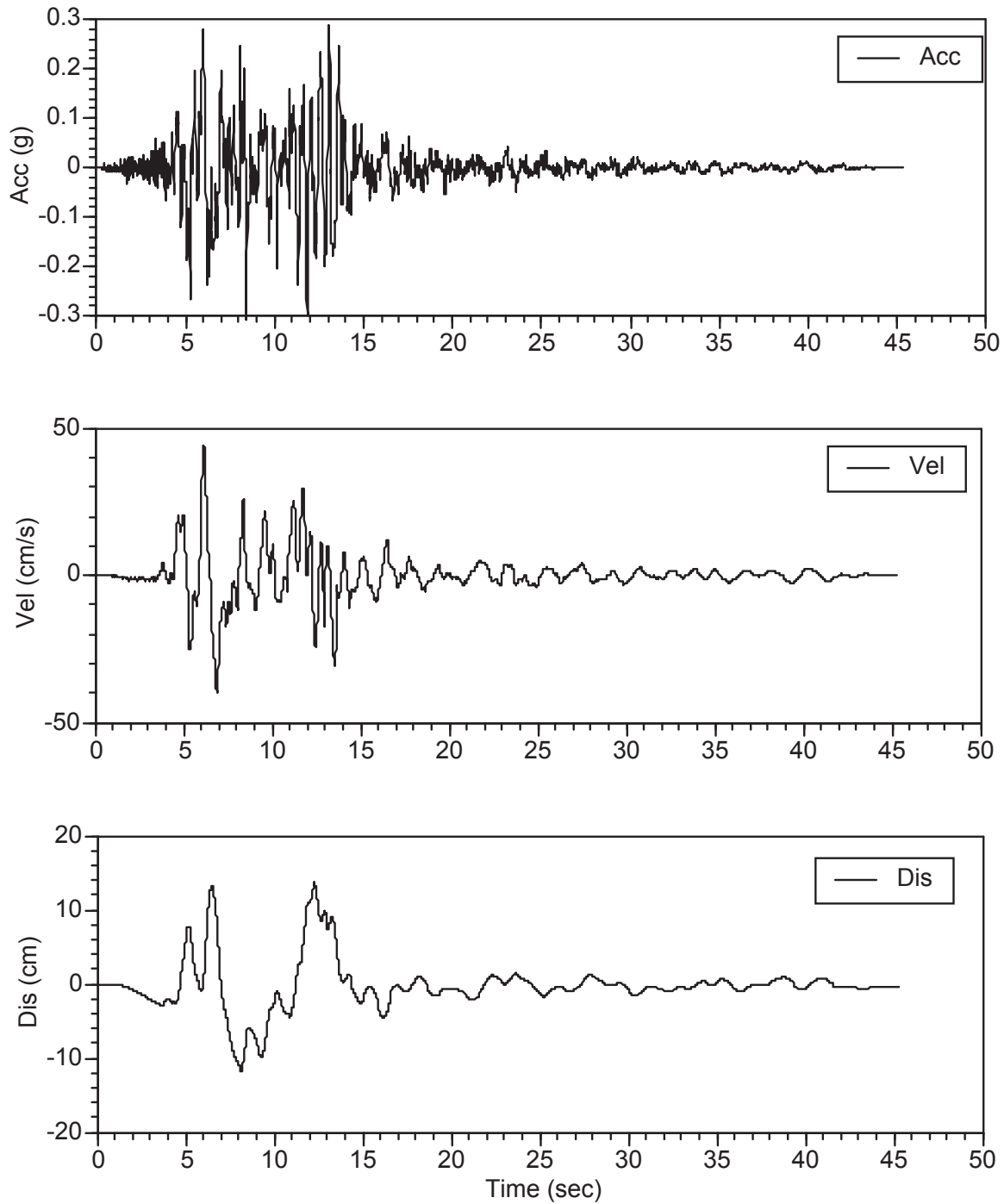
The seven (7) sets of 3-component time histories discussed in Section 3.3 and listed below in Table D-1 are modified to match the CLE firm-ground spectra using the time-domain approach. Each set has three (3) components (FN, FP and FV), resulting in a total of 21 time histories. For each time history, the following is plotted:

- Initial acceleration, velocity and displacement time histories scaled to PGA,
- Modified (spectral-matched) acceleration, velocity and displacement time histories, and
- Comparison of the target CLE spectrum with the spectra of the initial scaled and the modified time histories.

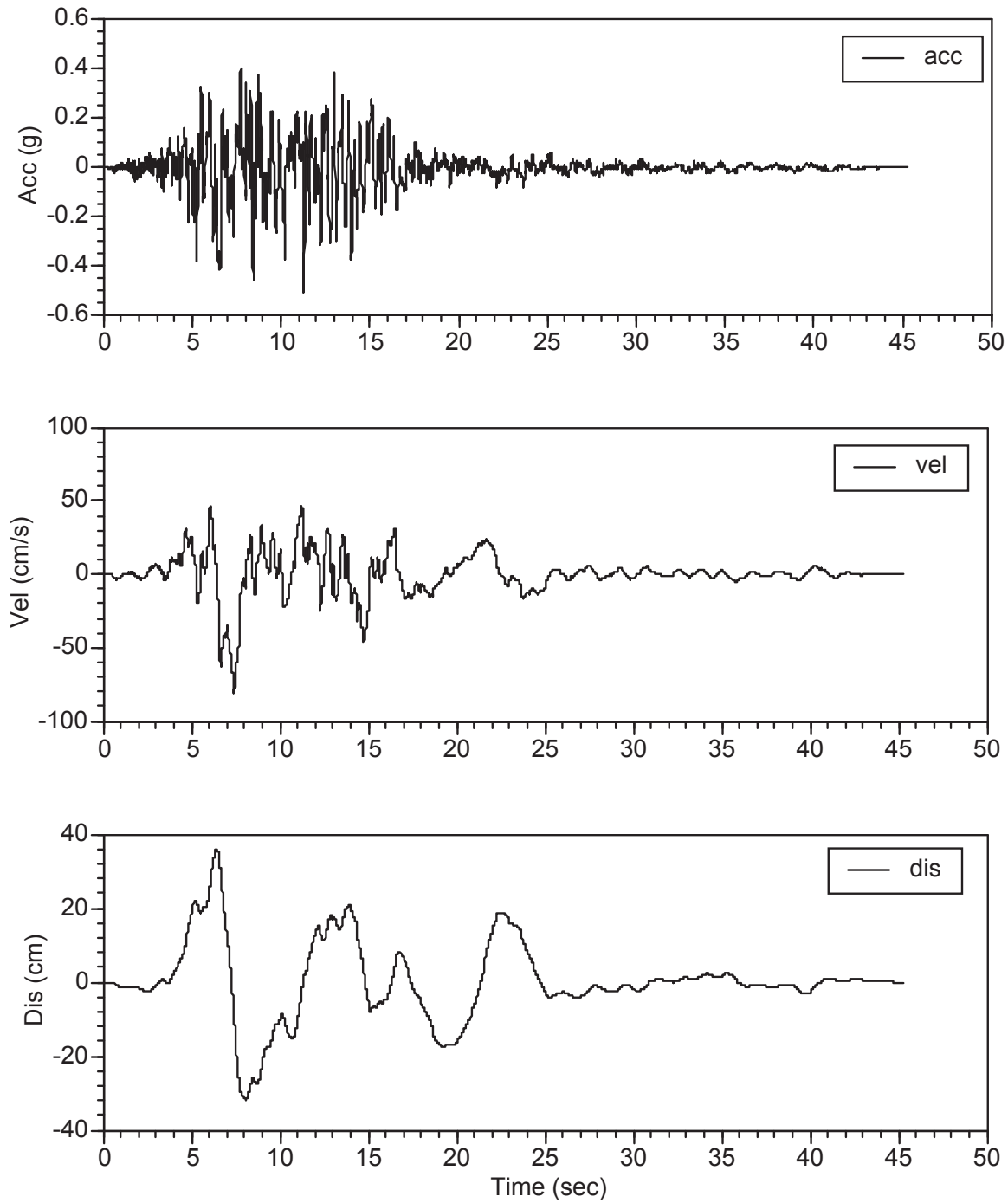
These plots are shown in Figure D-1 through Figure D-7 for the CLE time history set number 1 through set number 7, respectively.

**Table D-1. Ground Motion Sets Selected for CLE Spectral Matching**

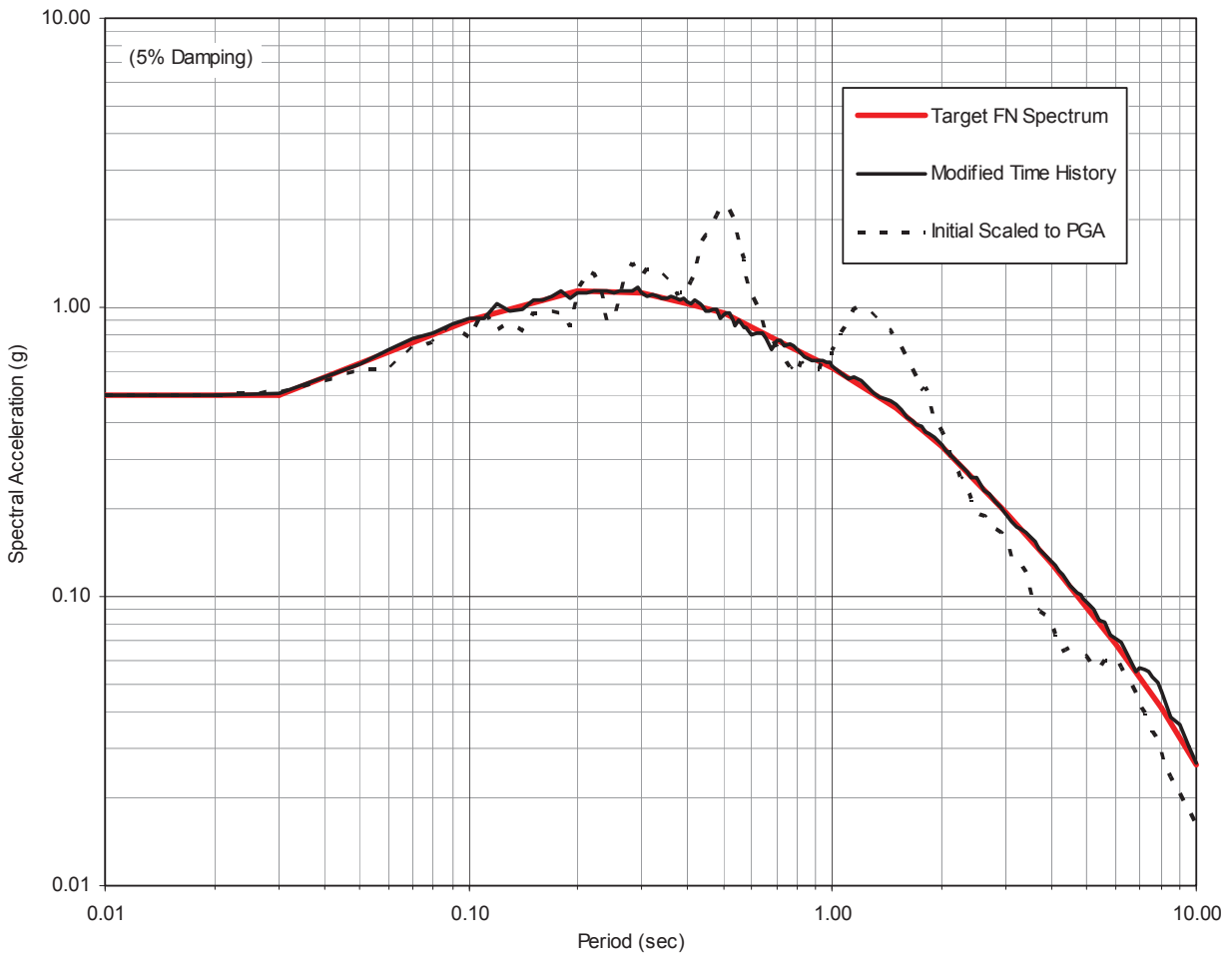
Set	Earthquake	Station	Magnitude	Distance (km)	Directivity Parameter $X \cos(\theta)$
1	1999 Hector mine	Hector	7.1	12	0.57
2	1989 Loma Prieta	Gilroy 03	6.9	13	0.45
3	1979 Imperial Valley	Brawley	6.5	10	0.75
4	1999 Duzce	Lamont 1059	7.1	4	0.36
5	1992 Erzikan	Erzikan	6.7	4	0.31
6	1940 Imperial Valley	El Centro	7.0	6	0.14
7	1995 Kobe	Kobe University	6.9	1	0.42



**Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(a) Initial Time History for FN Component**



**Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(b) Modified Time History for FN Component**



**Figure D-1. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 1**  
**(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**

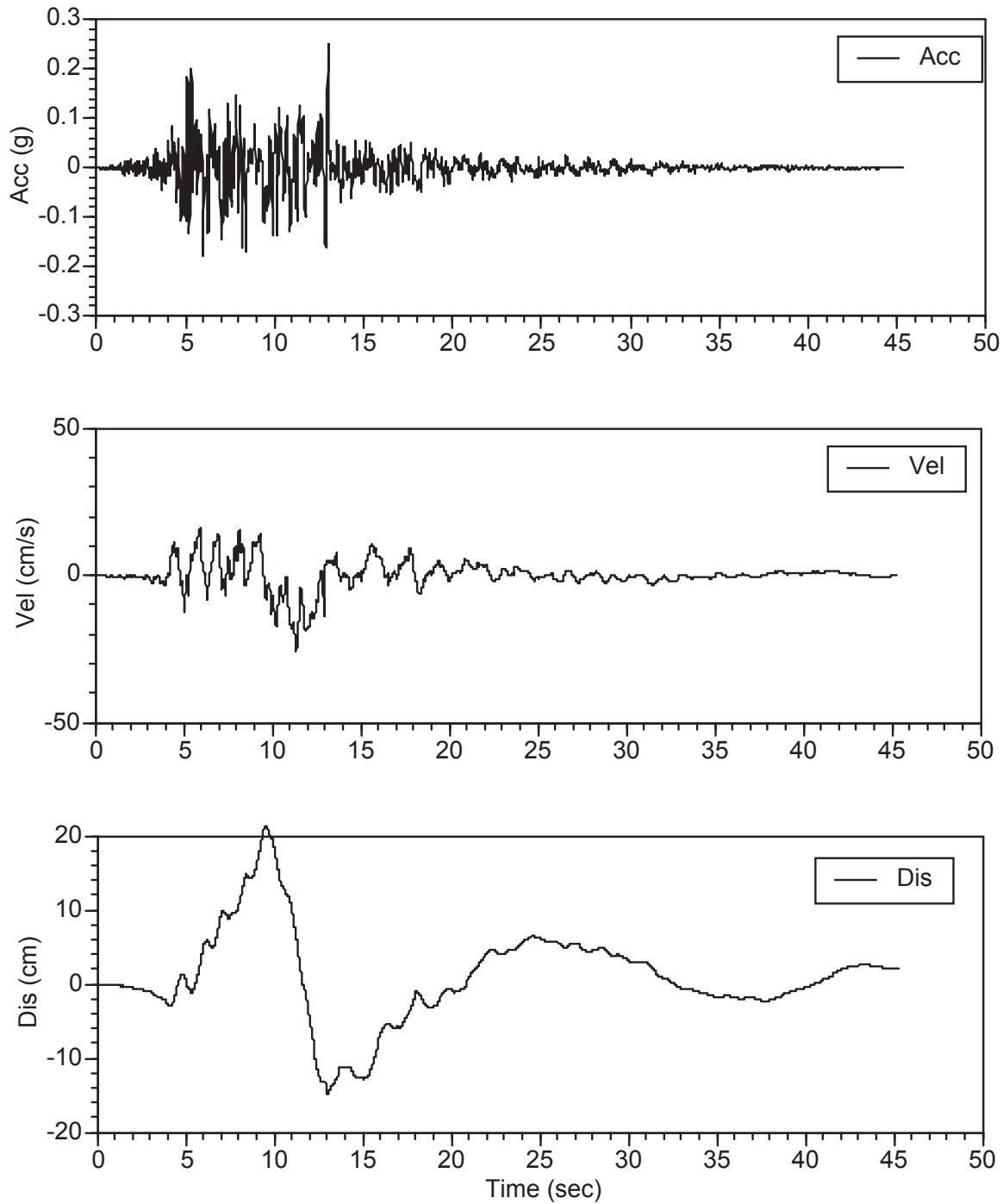
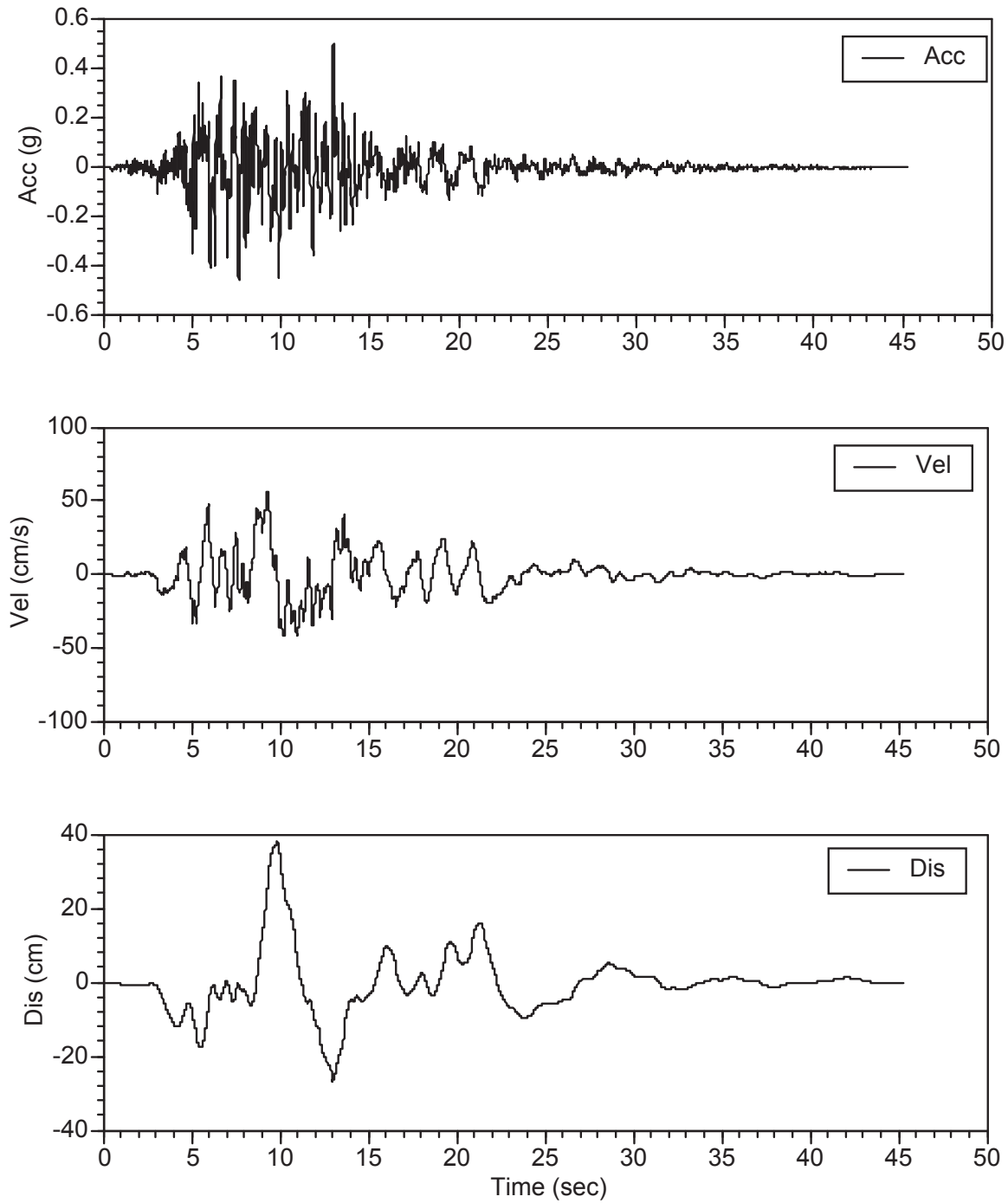
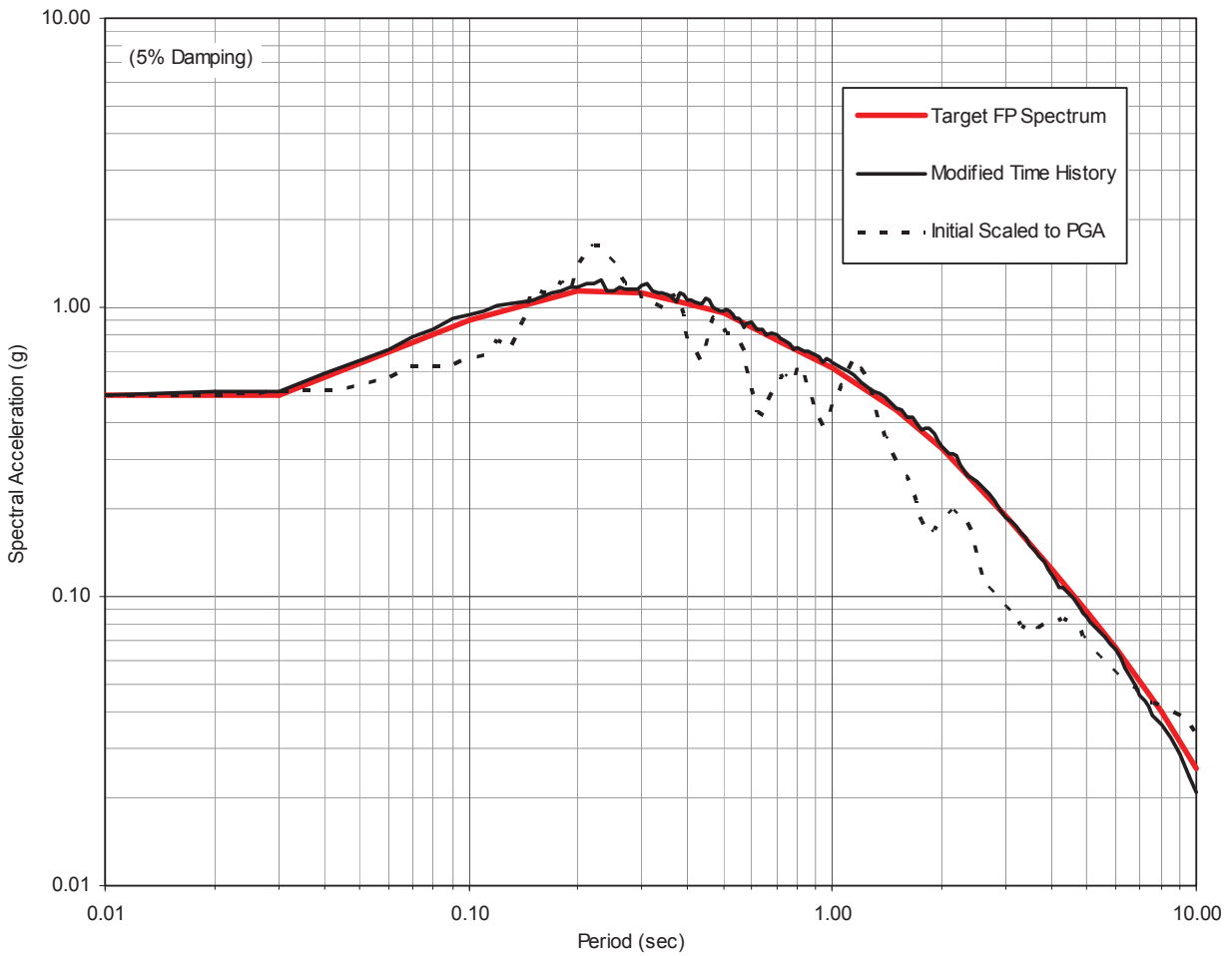


Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(d) Initial Time History for FP Component

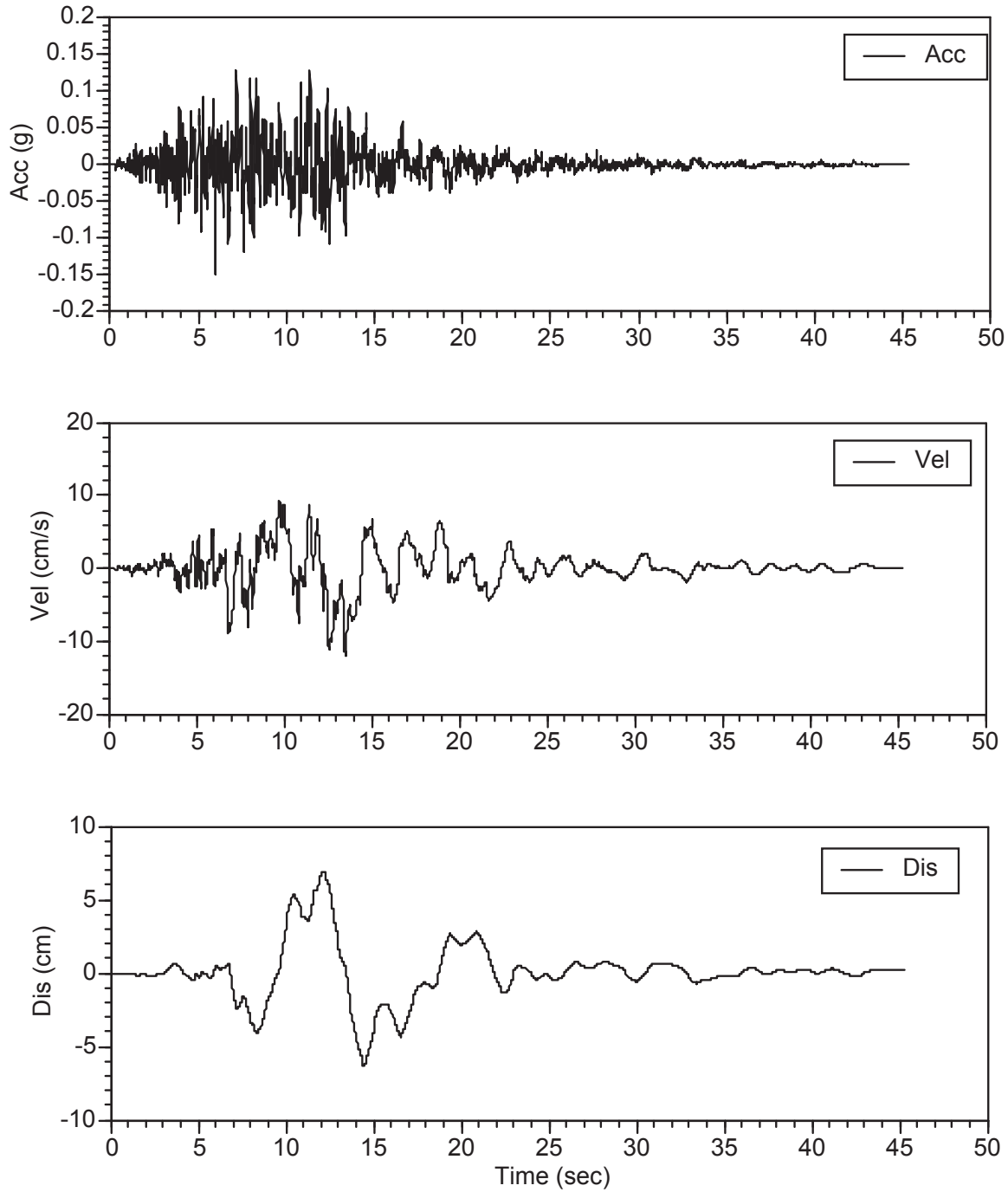


**Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(e) Modified Time History for FP Component**

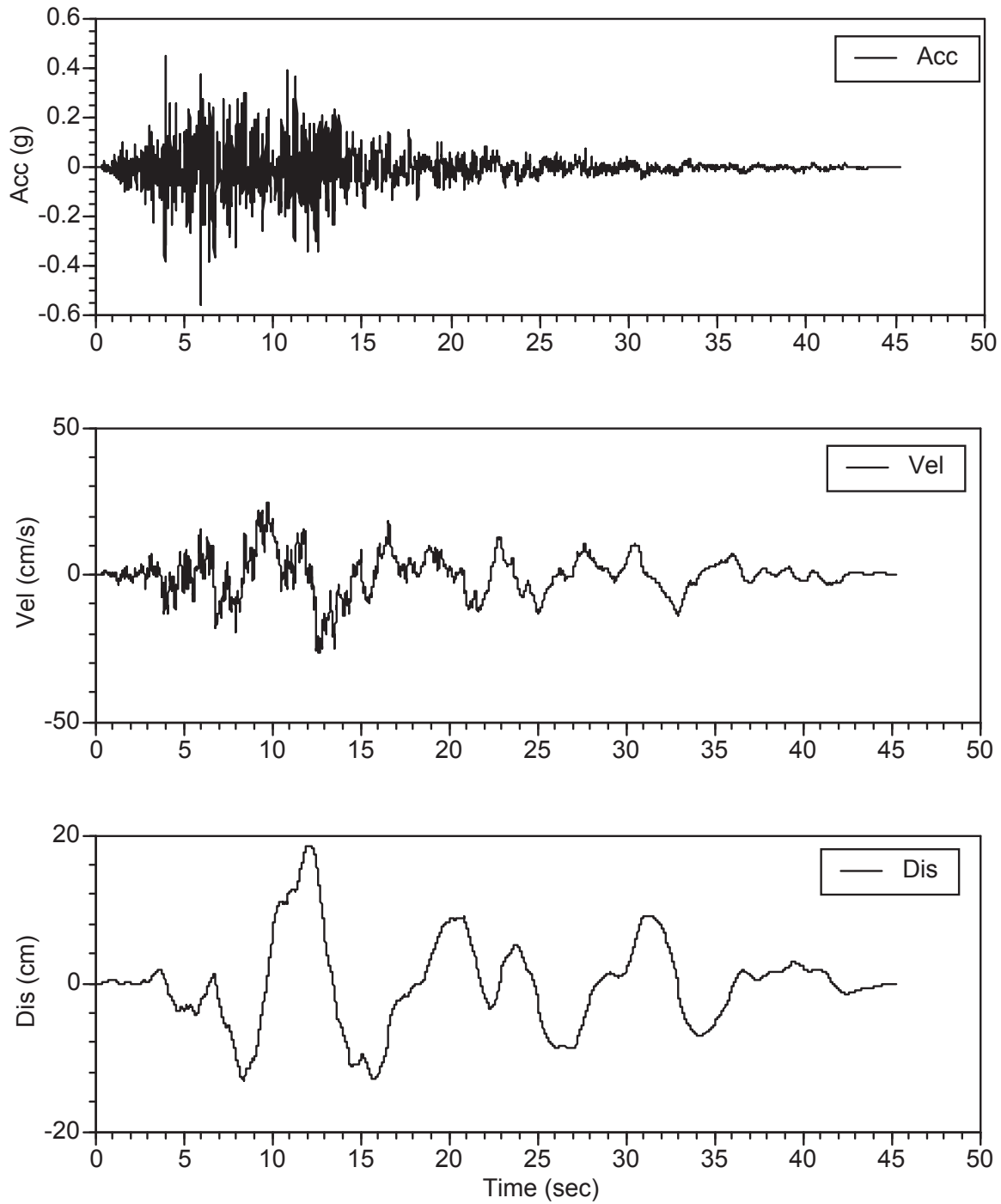




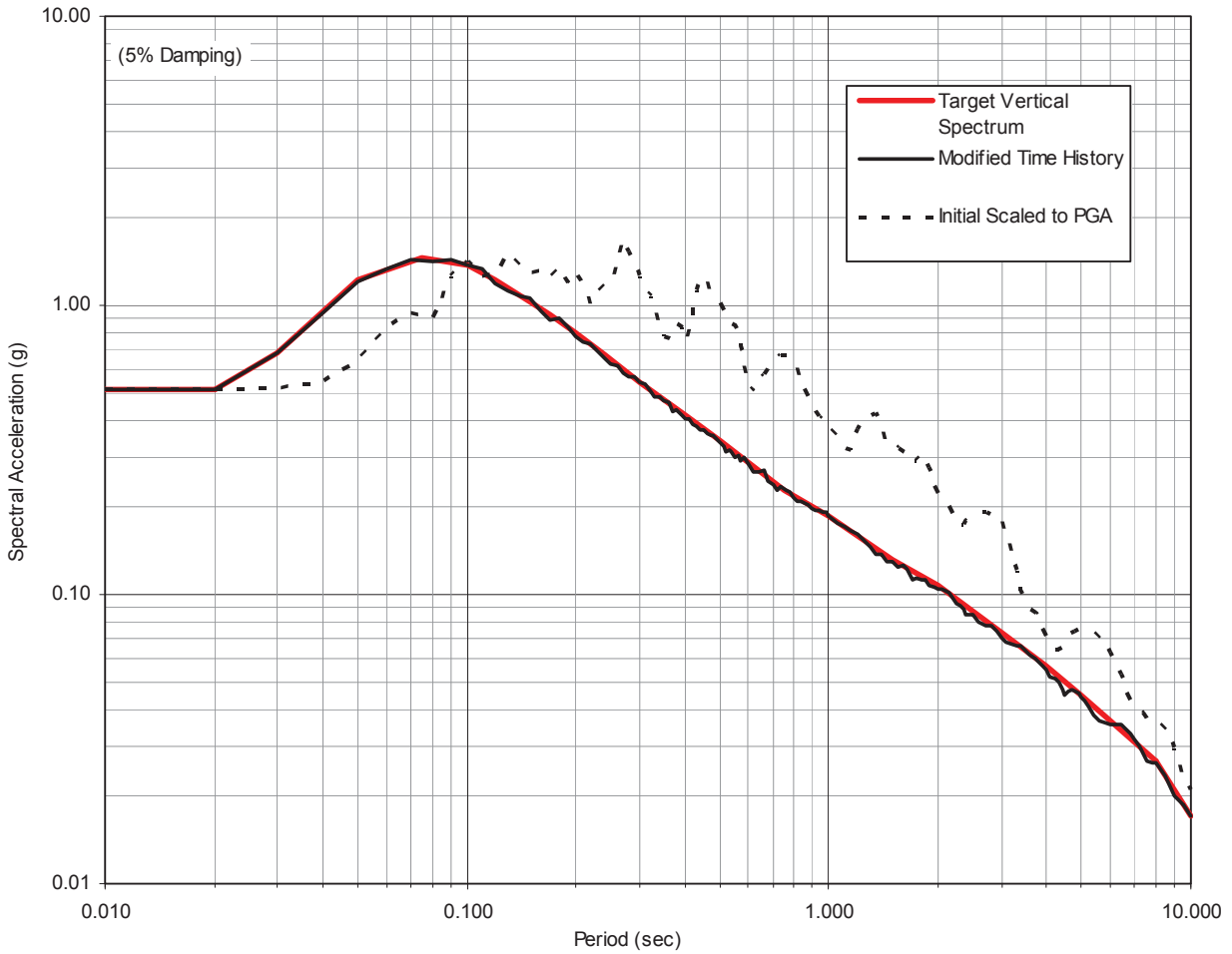
**Figure D-1. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 1 (f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**



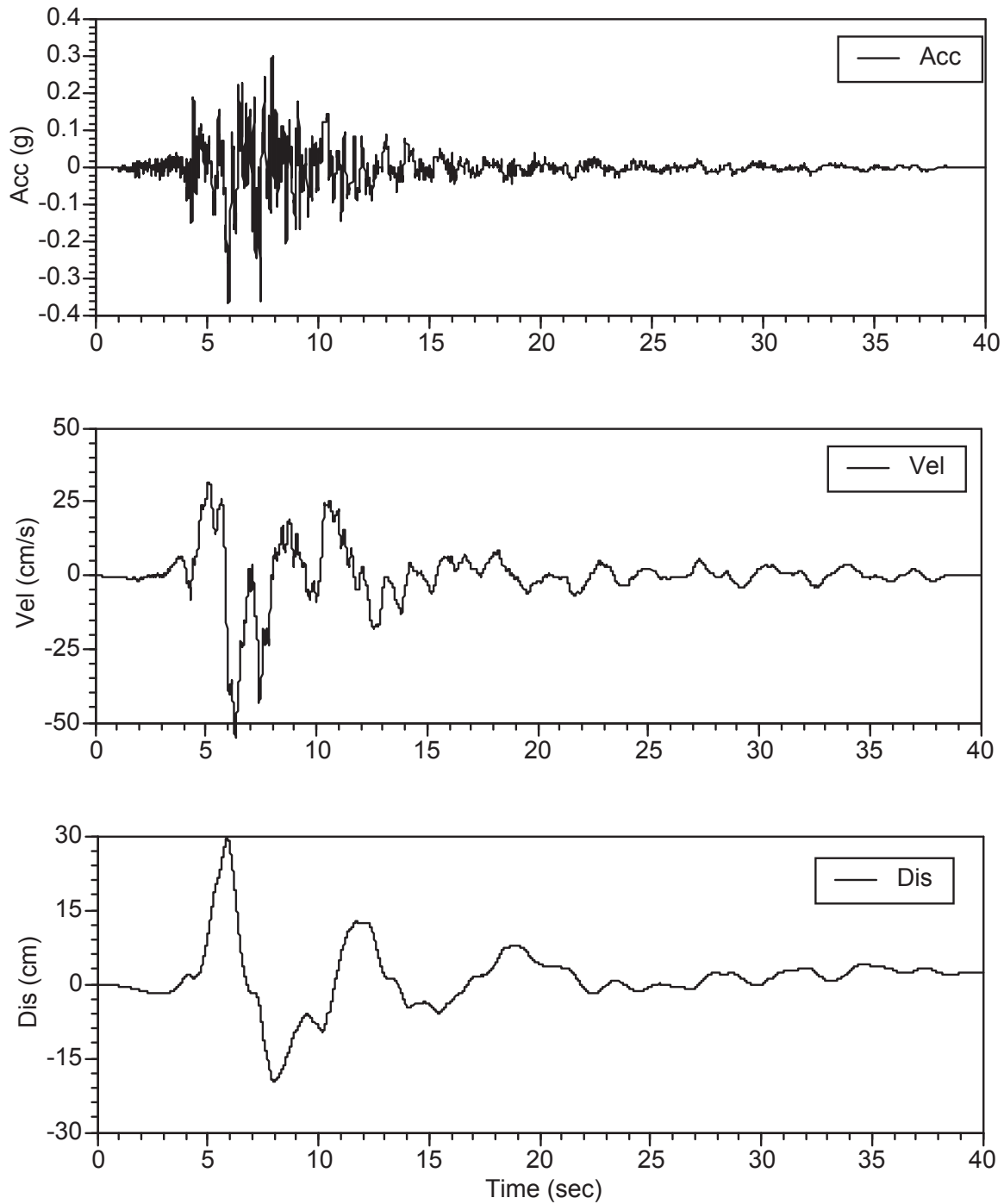
**Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1 (g) Initial Time History for FV Component**



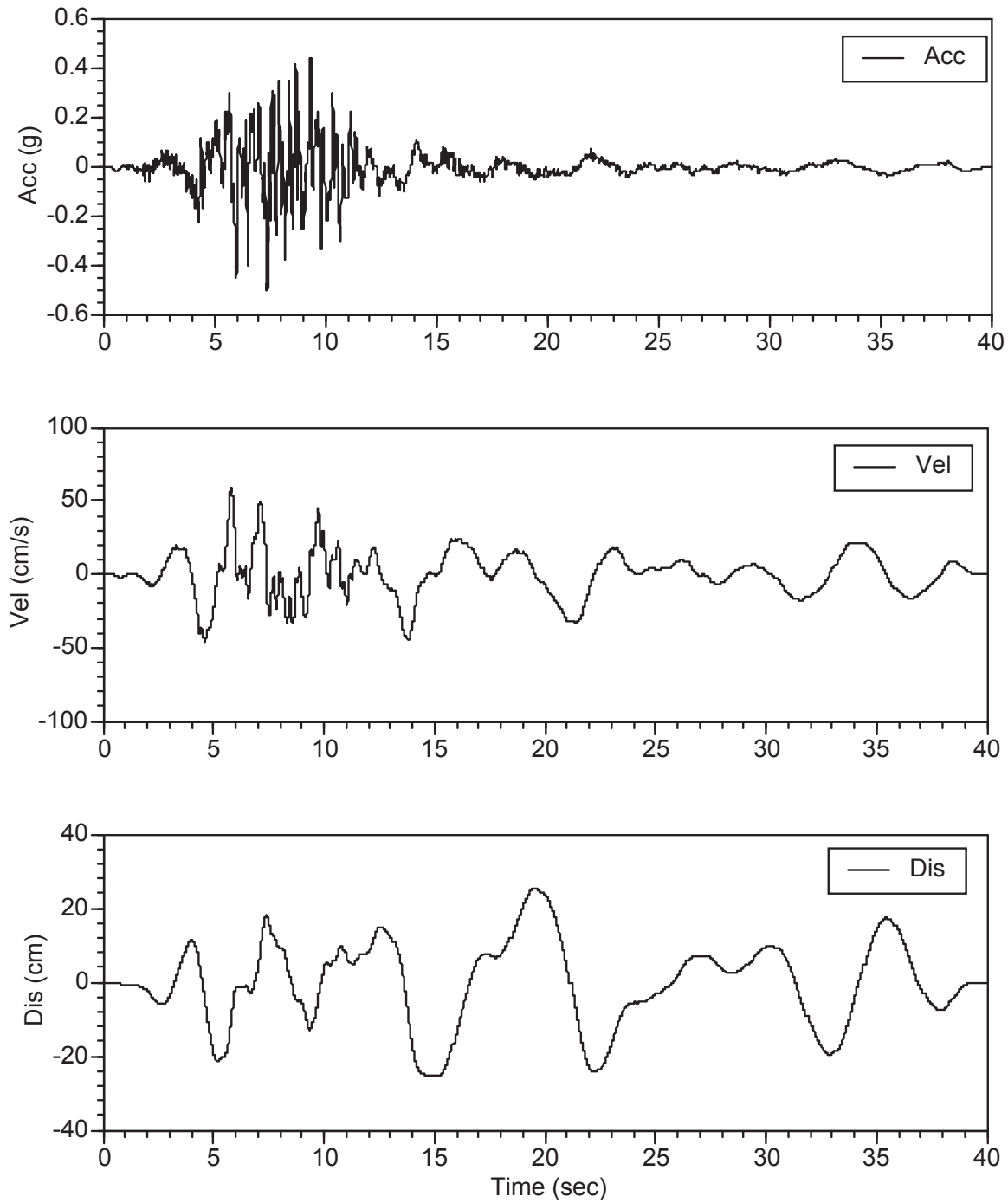
**Figure D-1. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(h) Modified Time History for FV Component**



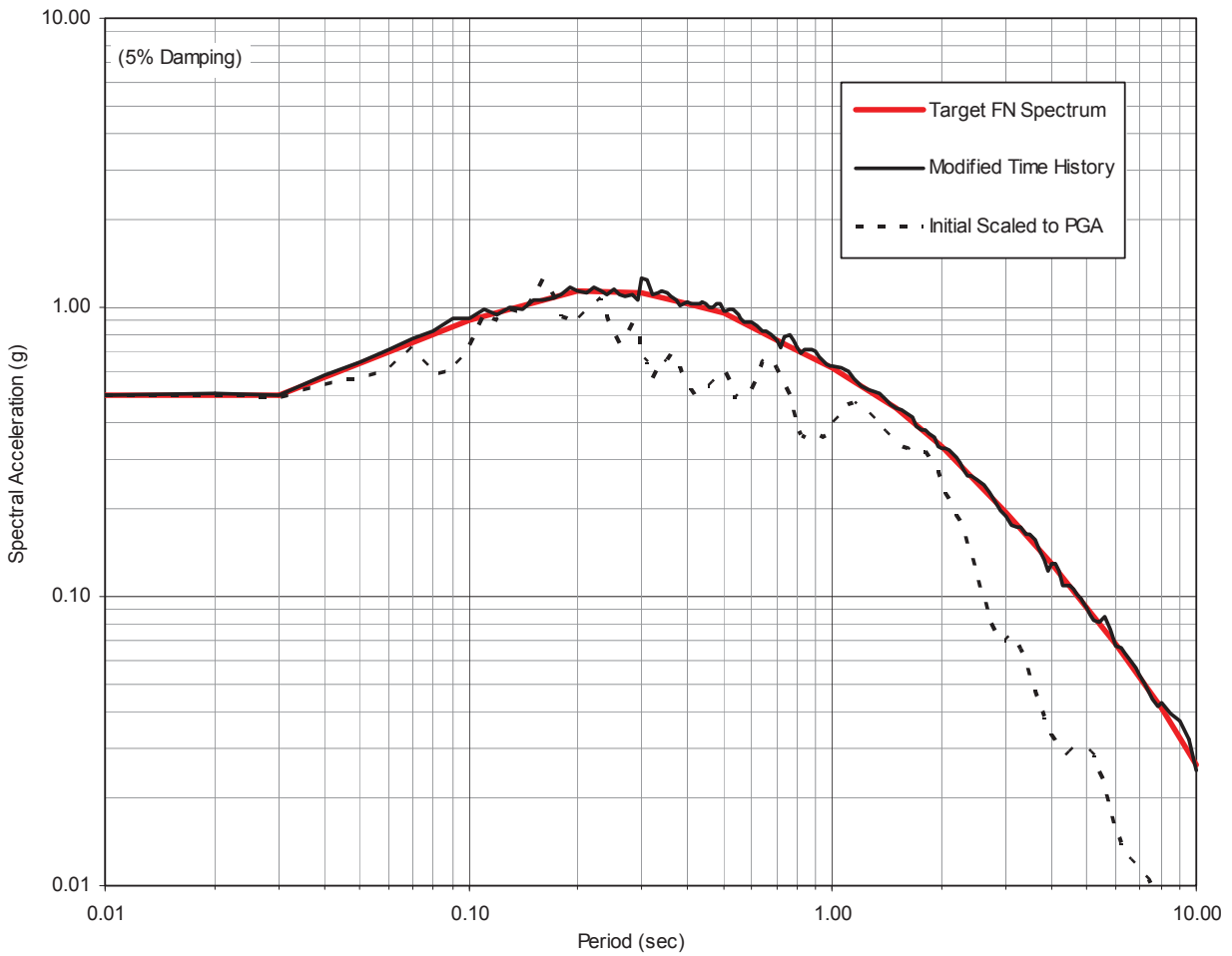
**Figure D-1. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 1  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**



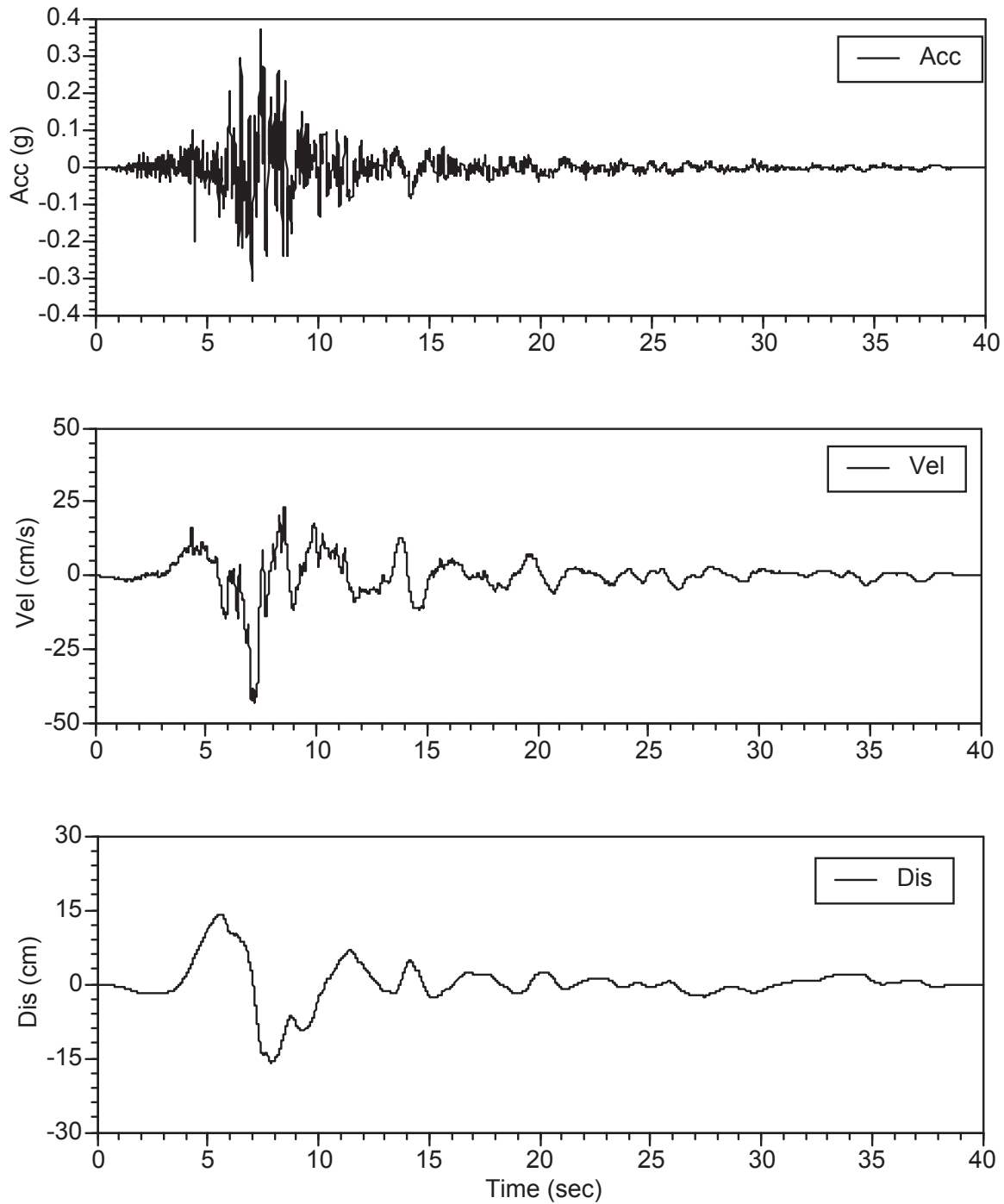
**Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 2  
(a) Initial Time History for FN Component**



**Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 2  
(b) Modified Time History for FN Component**

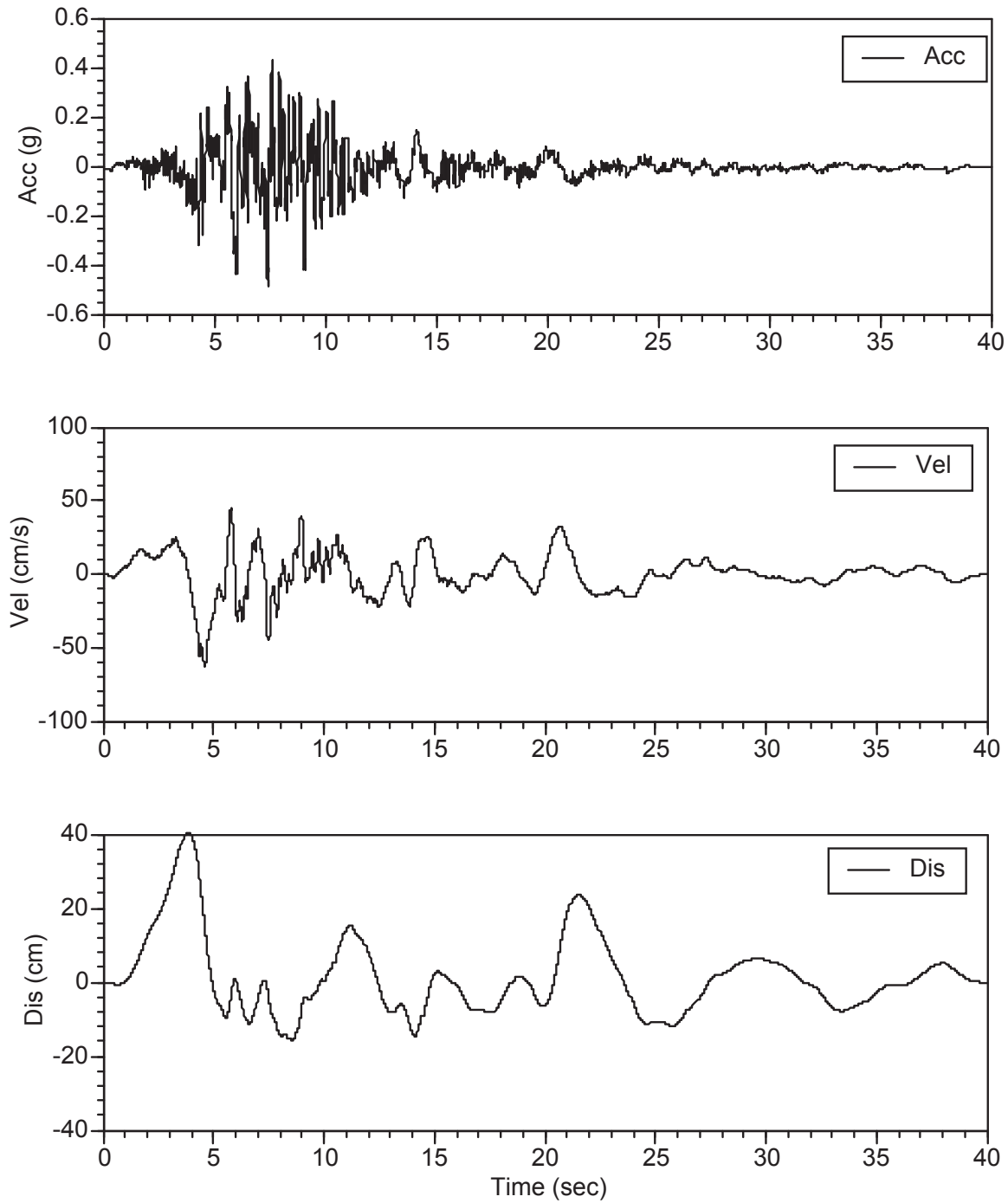


**Figure D-2. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 2**  
**(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**

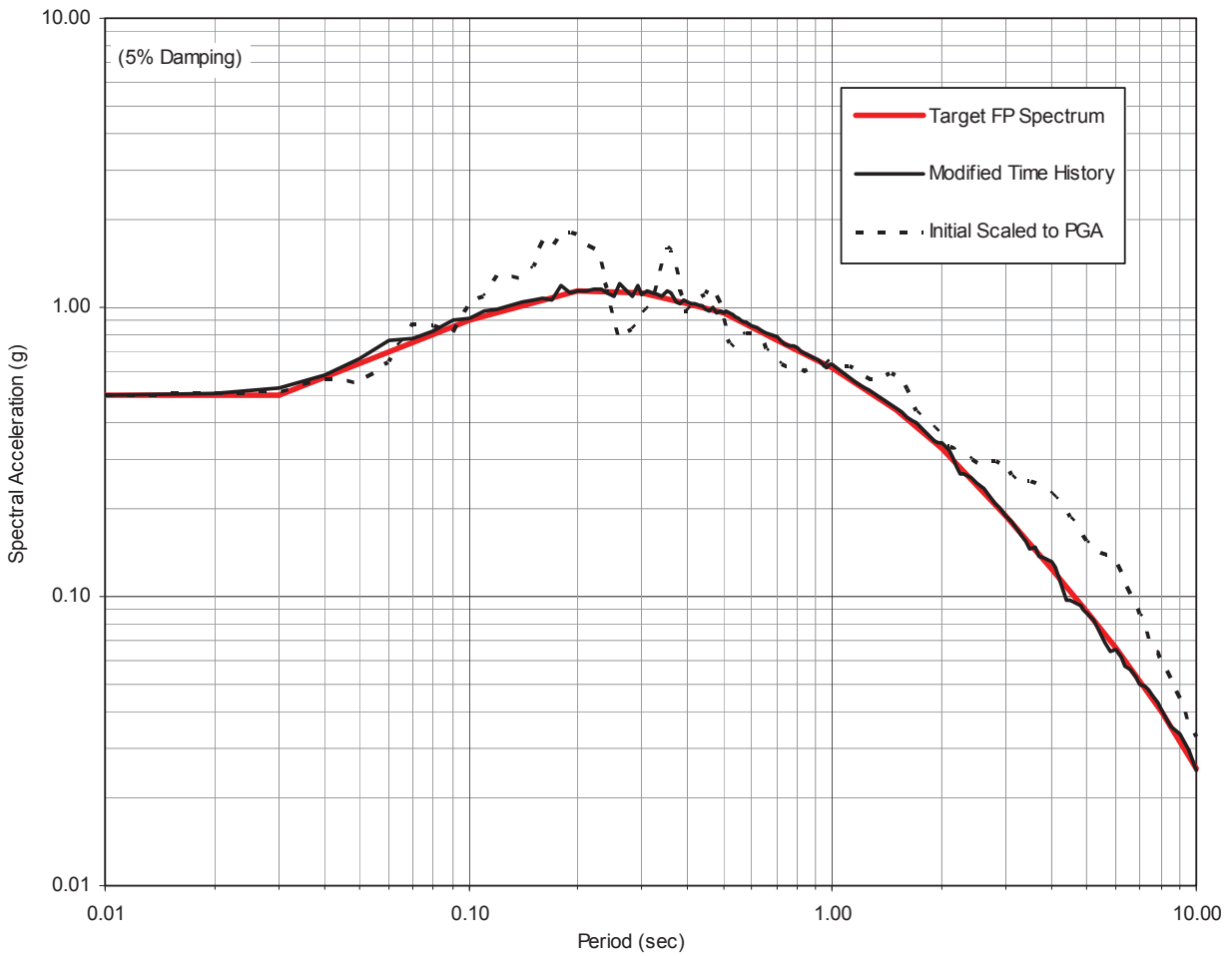


**Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 1  
(d) Initial Time History for FP Component**





**Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 2  
(e) Modified Time History for FP Component**



**Figure D-2. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 2  
(f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**

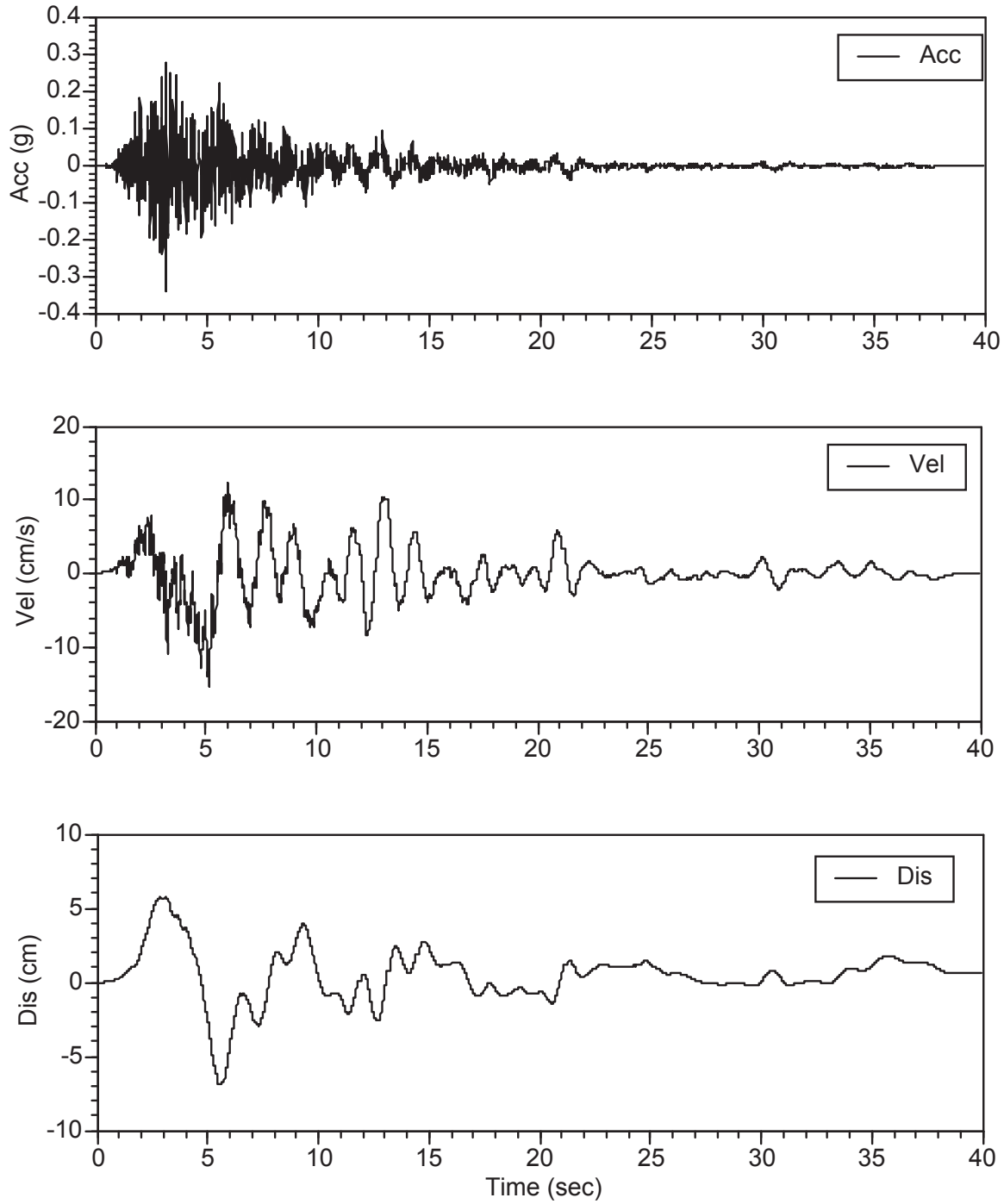
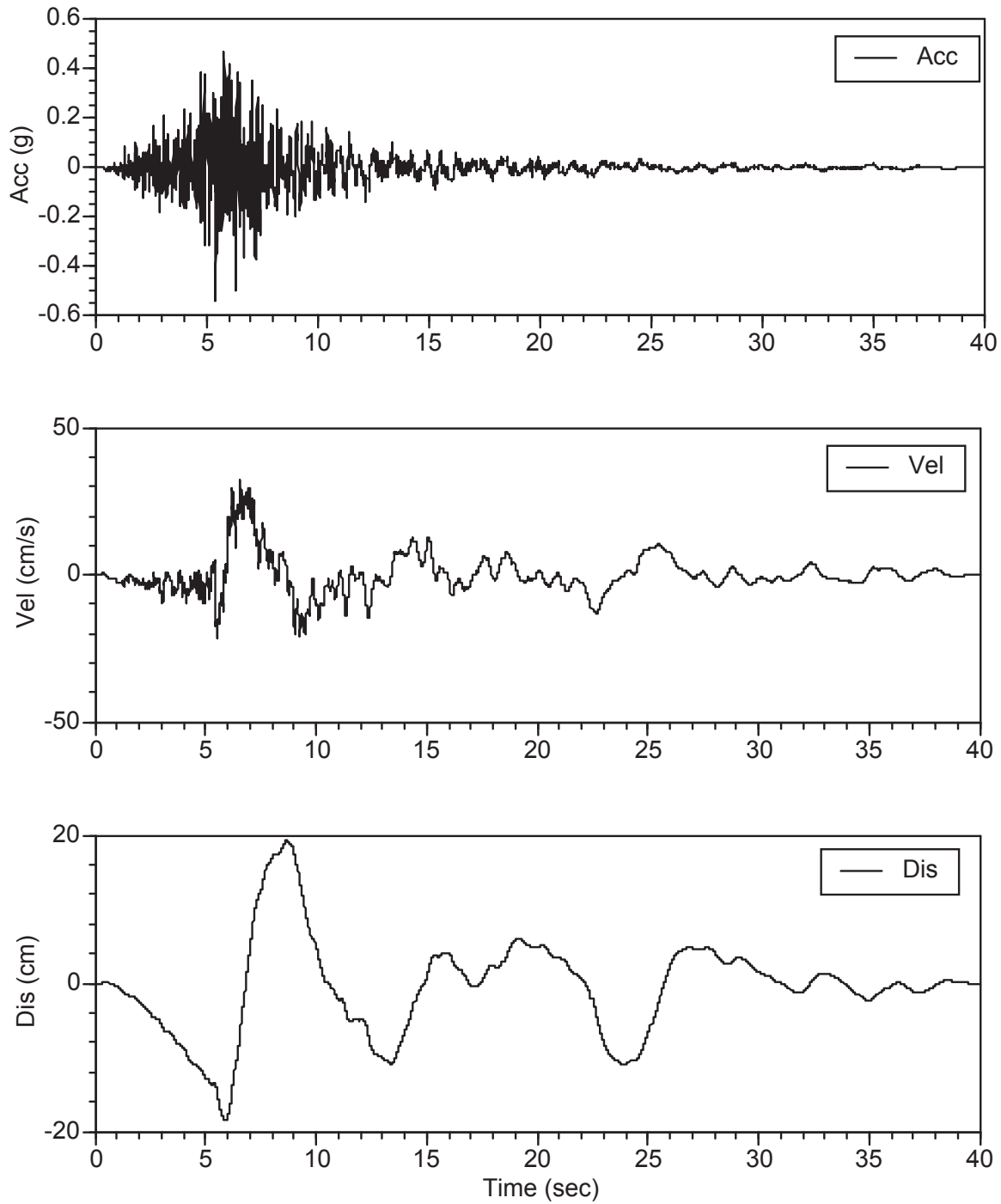
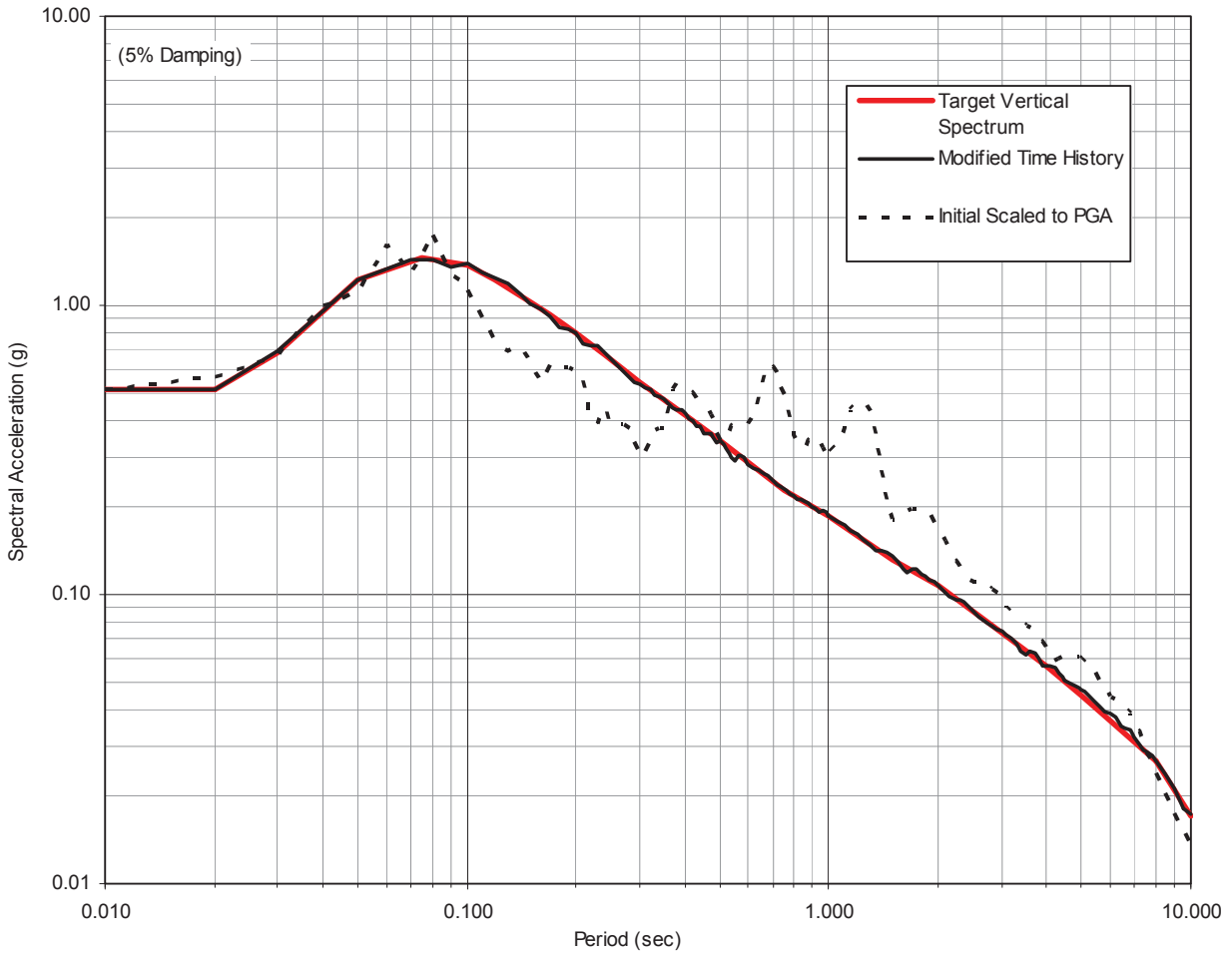


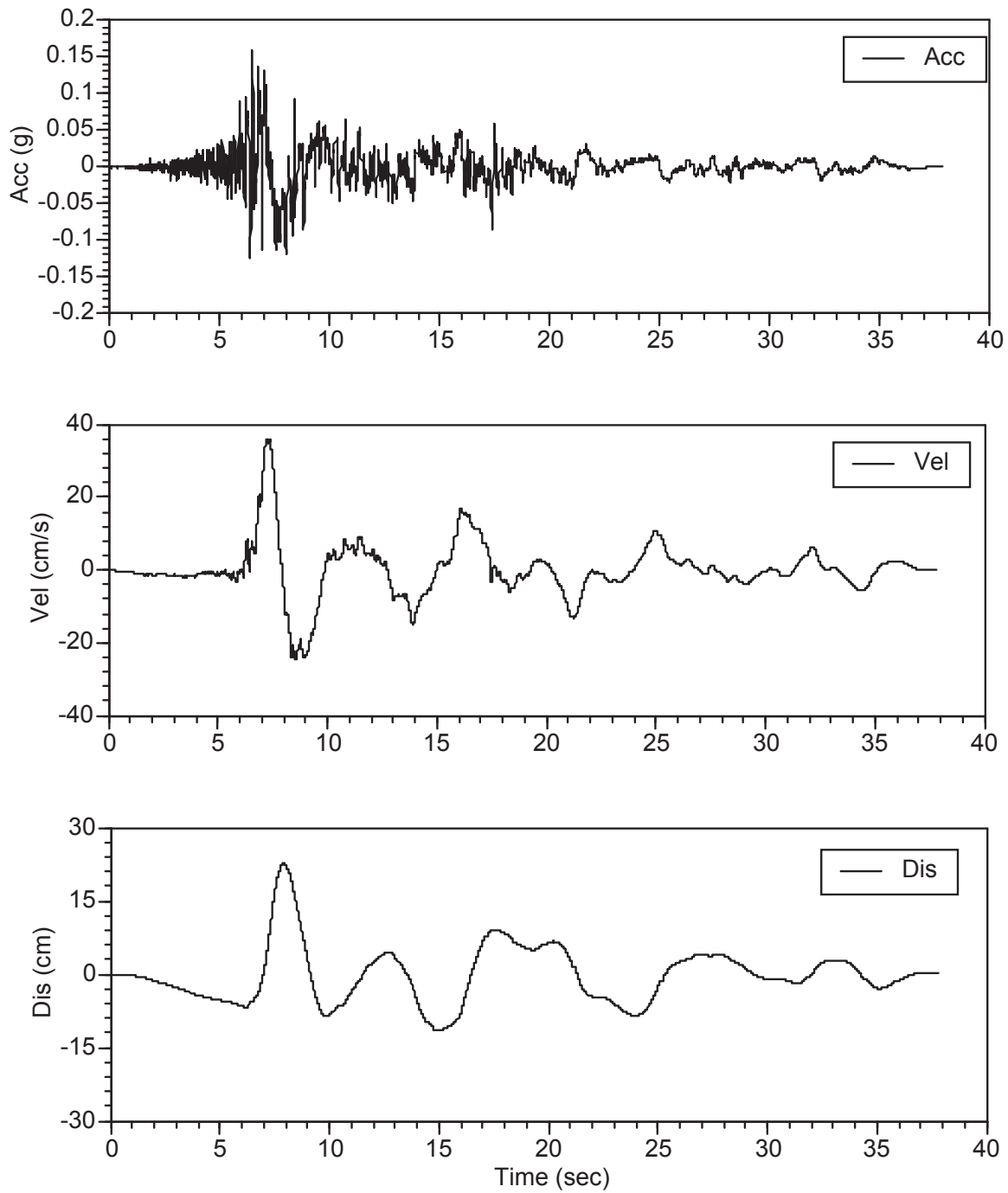
Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 2  
(g) Initial Time History for FV Component



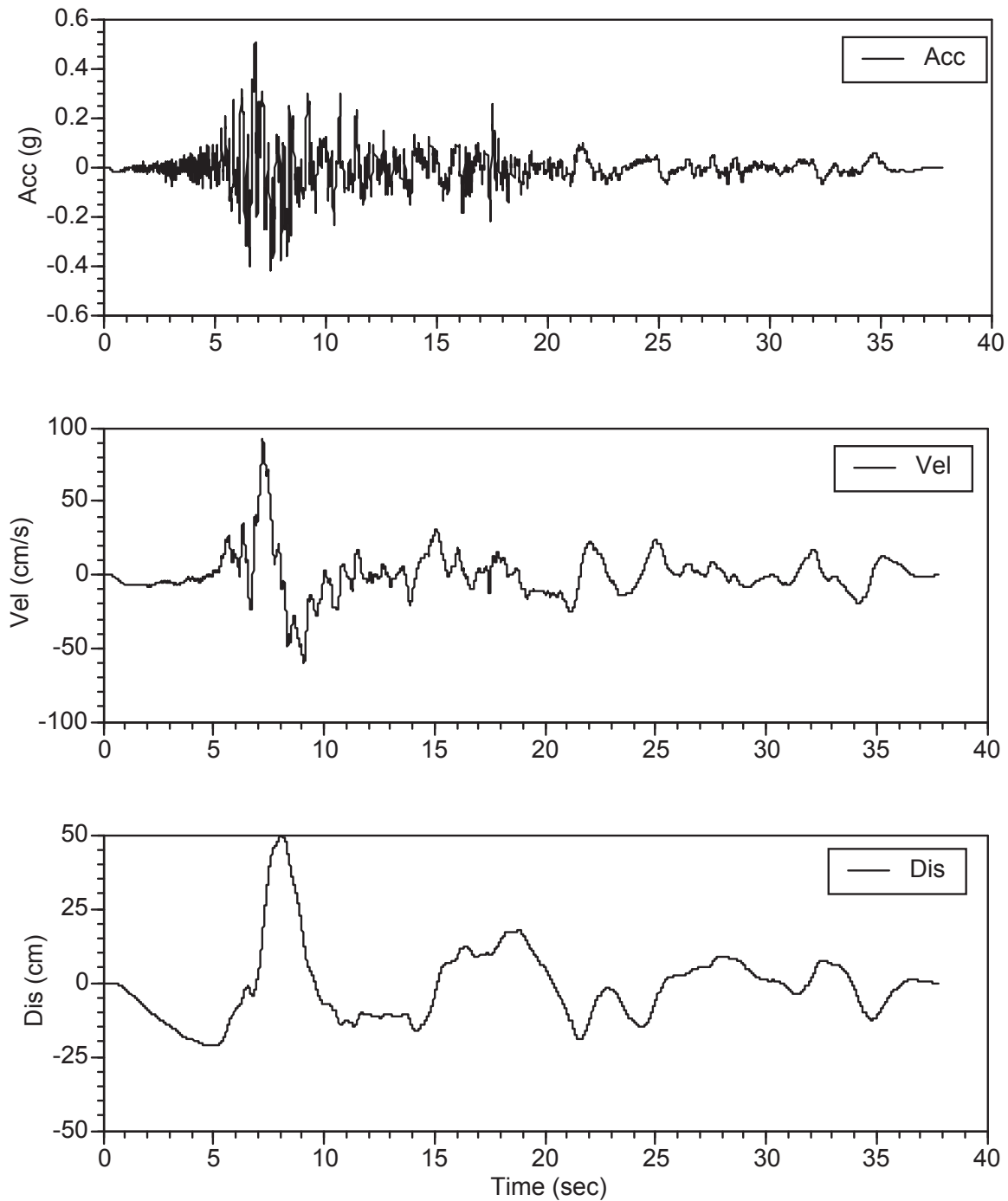
**Figure D-2. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 2  
(h) Modified Time History for FV Component**



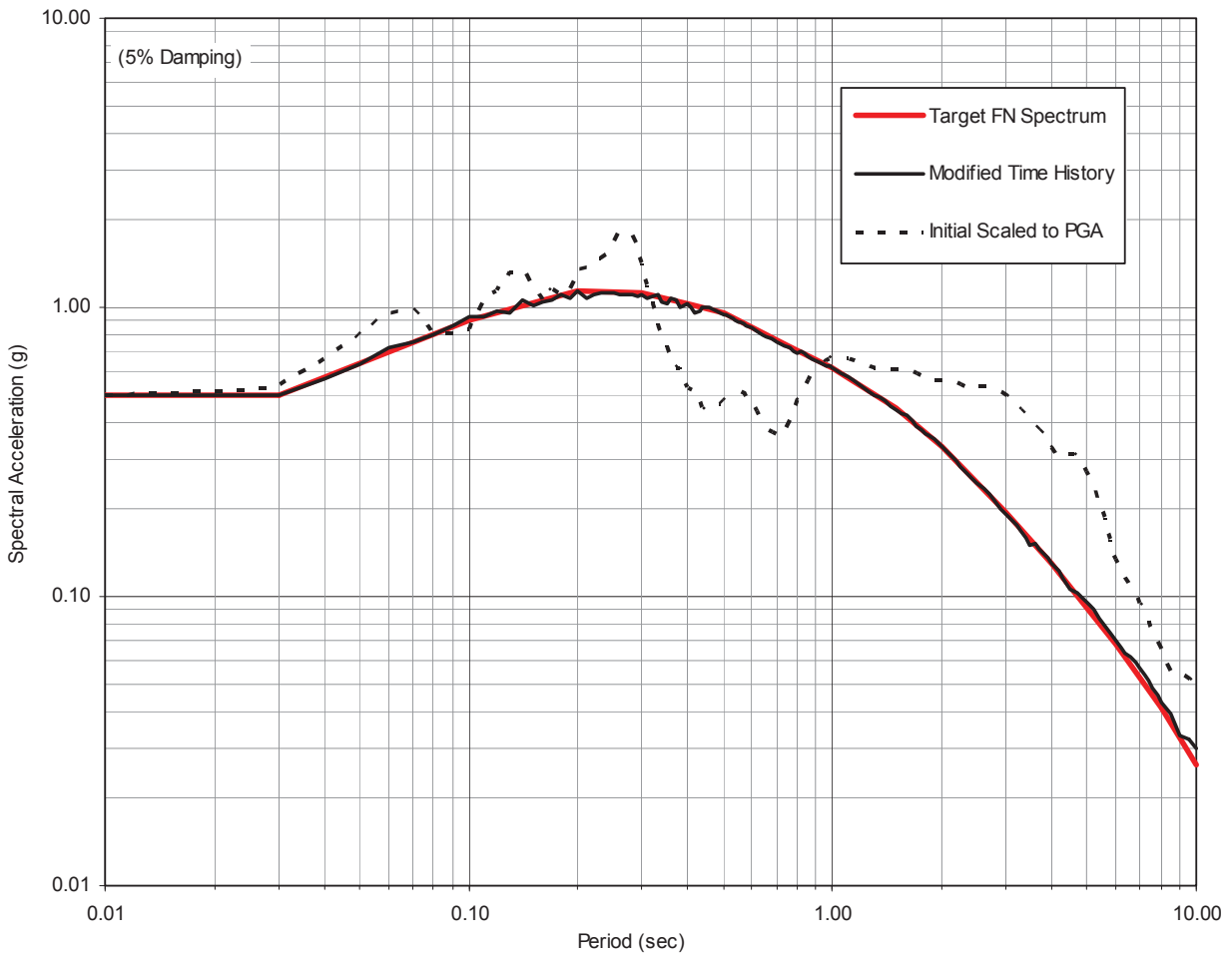
**Figure D-2. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 2  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**



**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3**  
**(a) Initial Time History for FN Component**

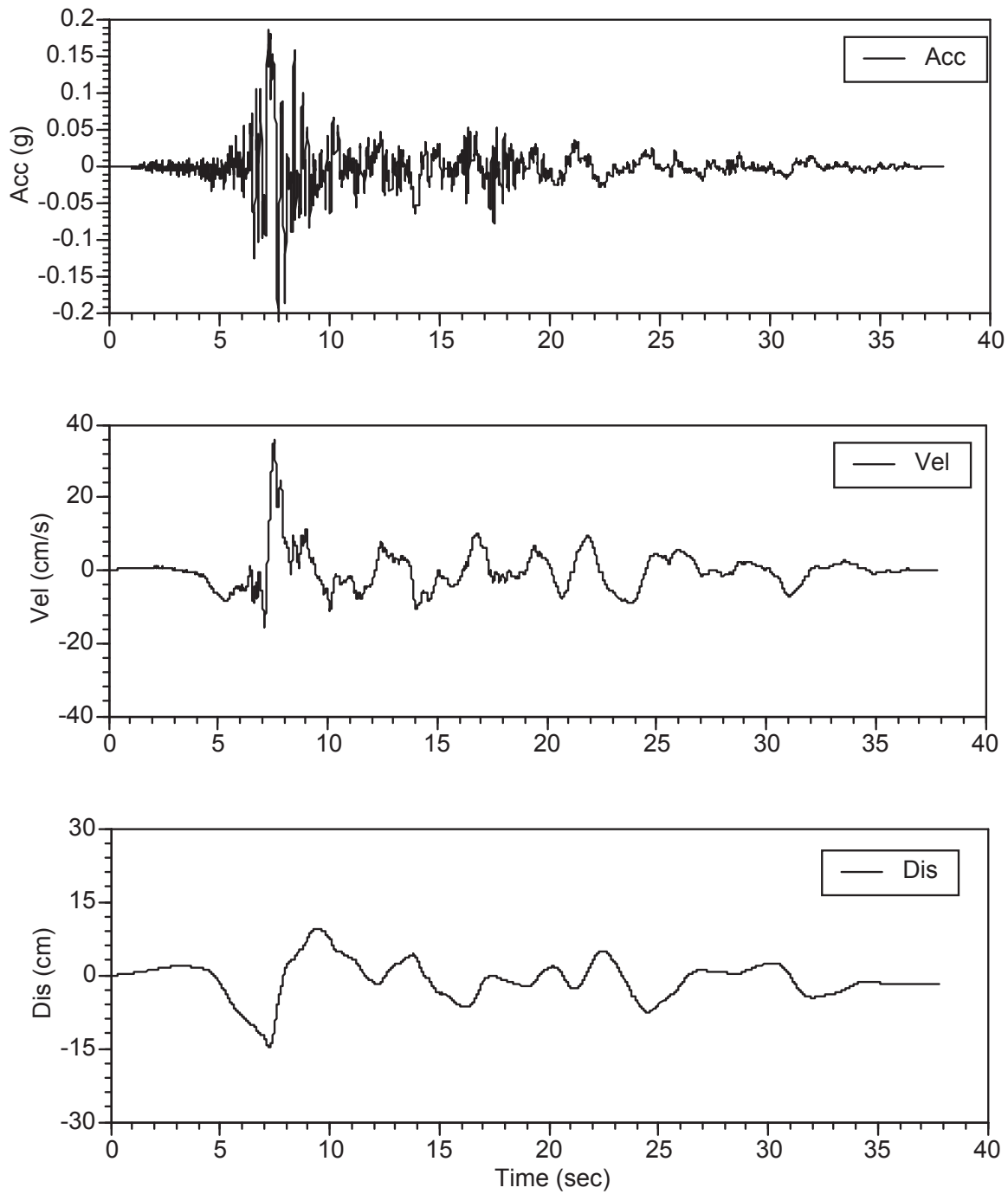


**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3  
(b) Modified Time History for FN Component**

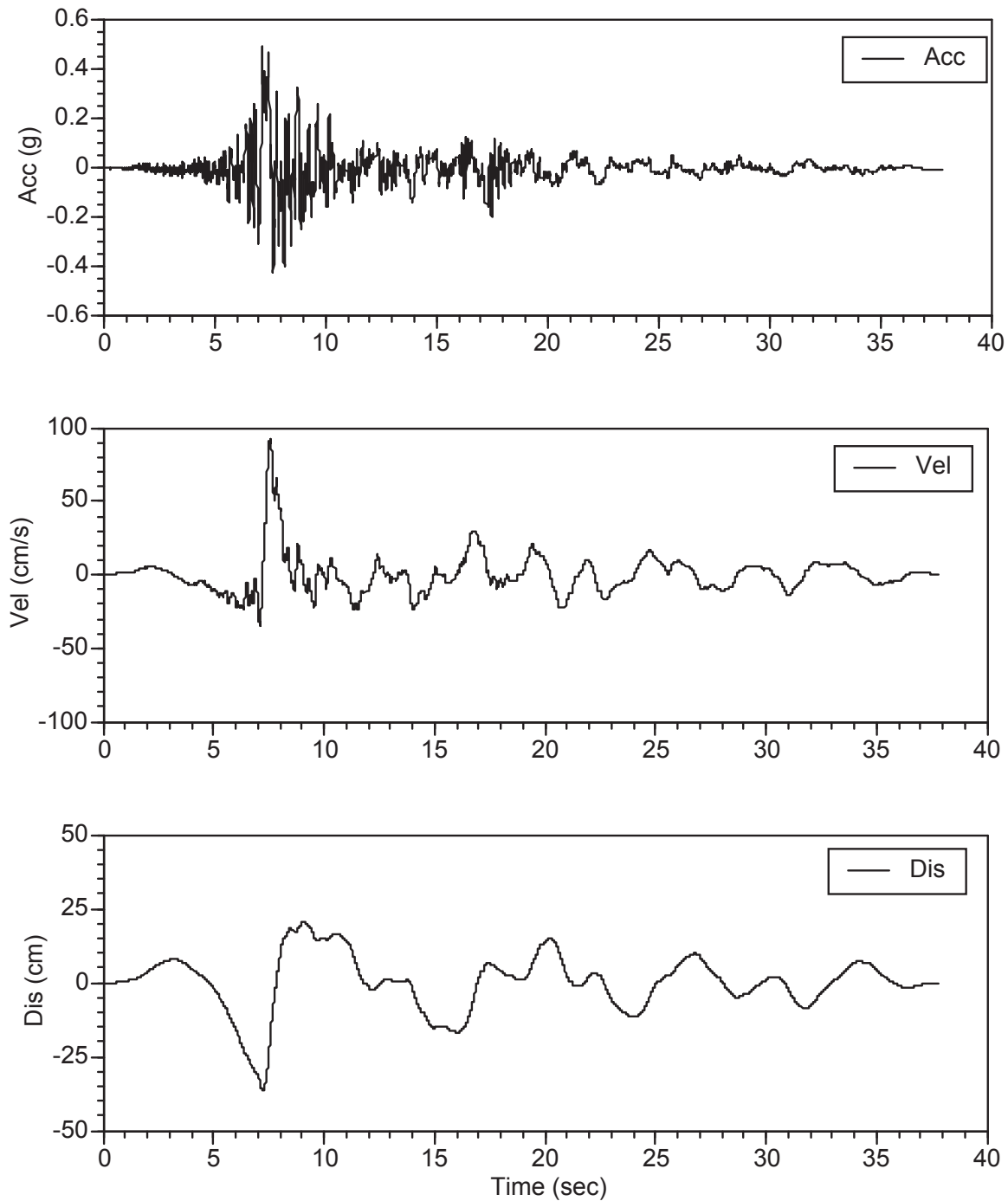


**Figure D-3. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 3  
(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**

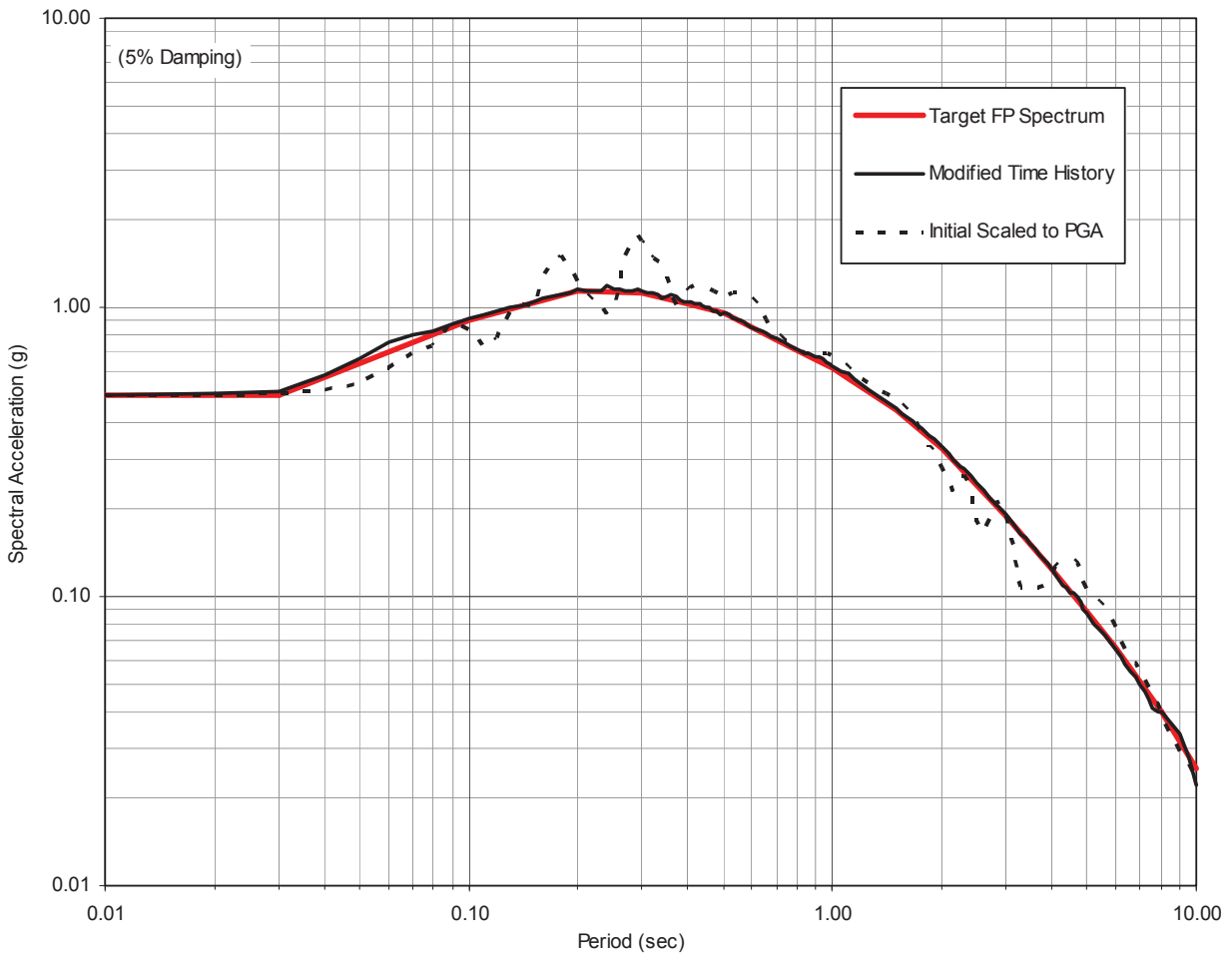




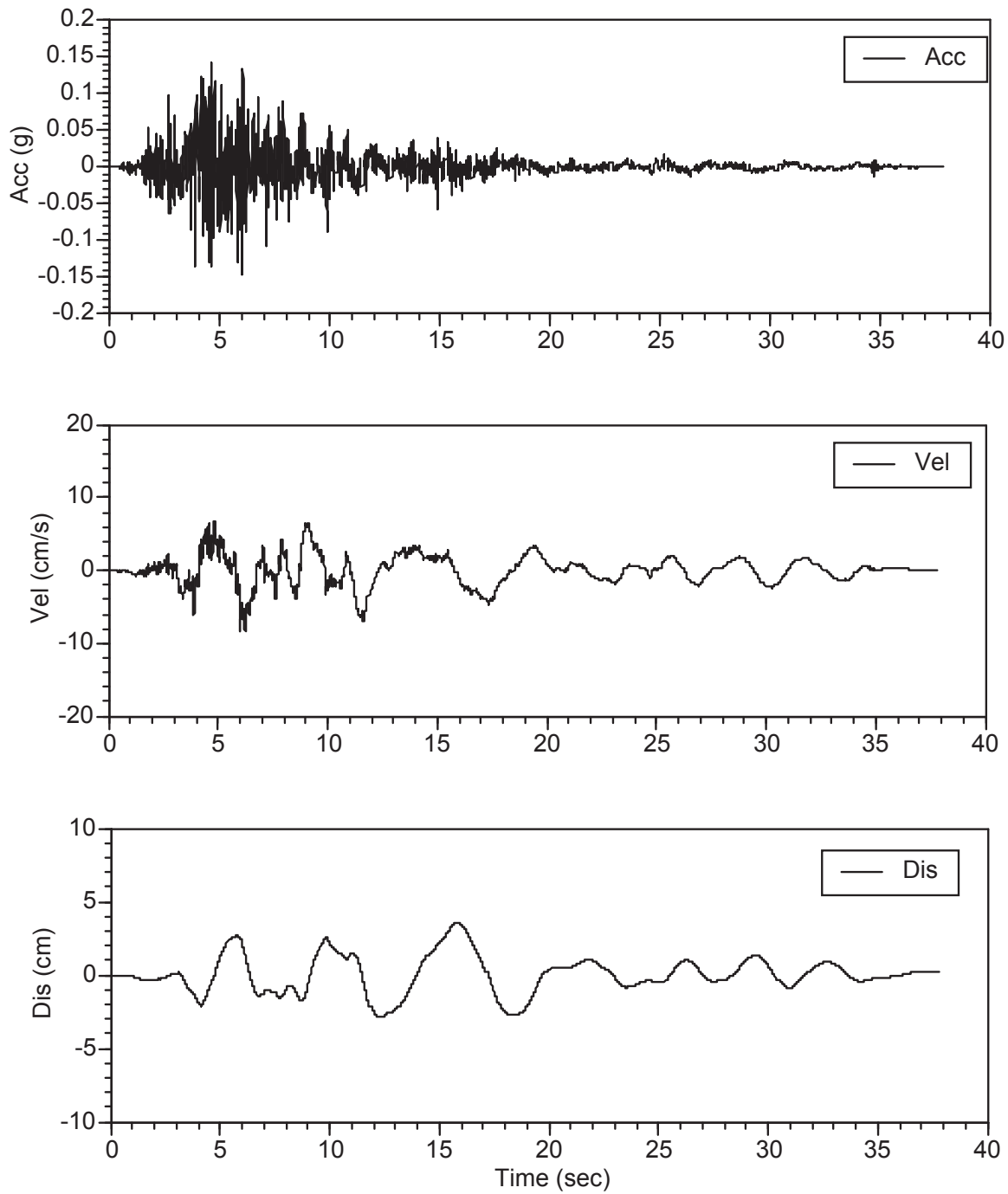
**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3  
(d) Initial Time History for FP Component**



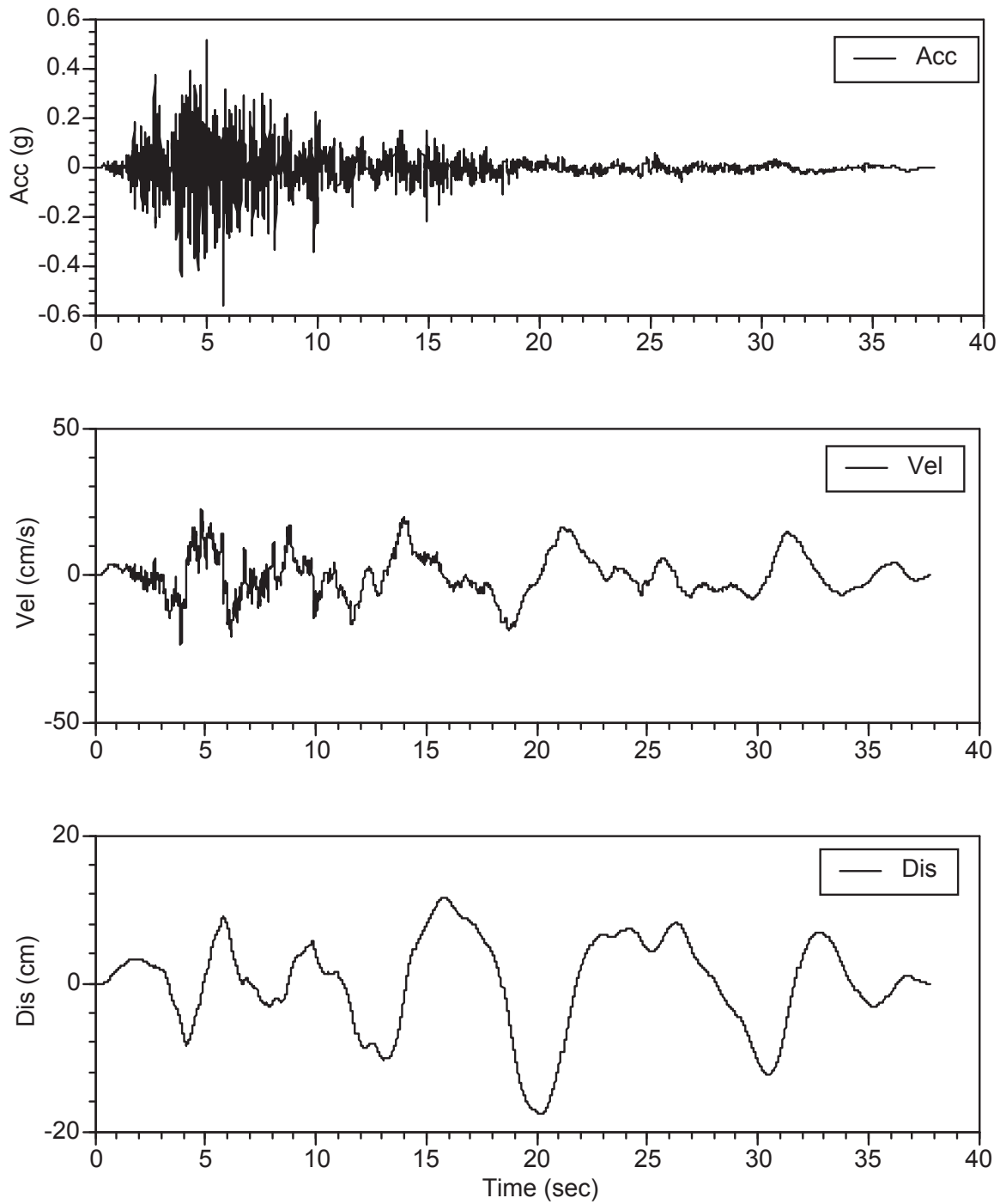
**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3  
(e) Modified Time History for FP Component**



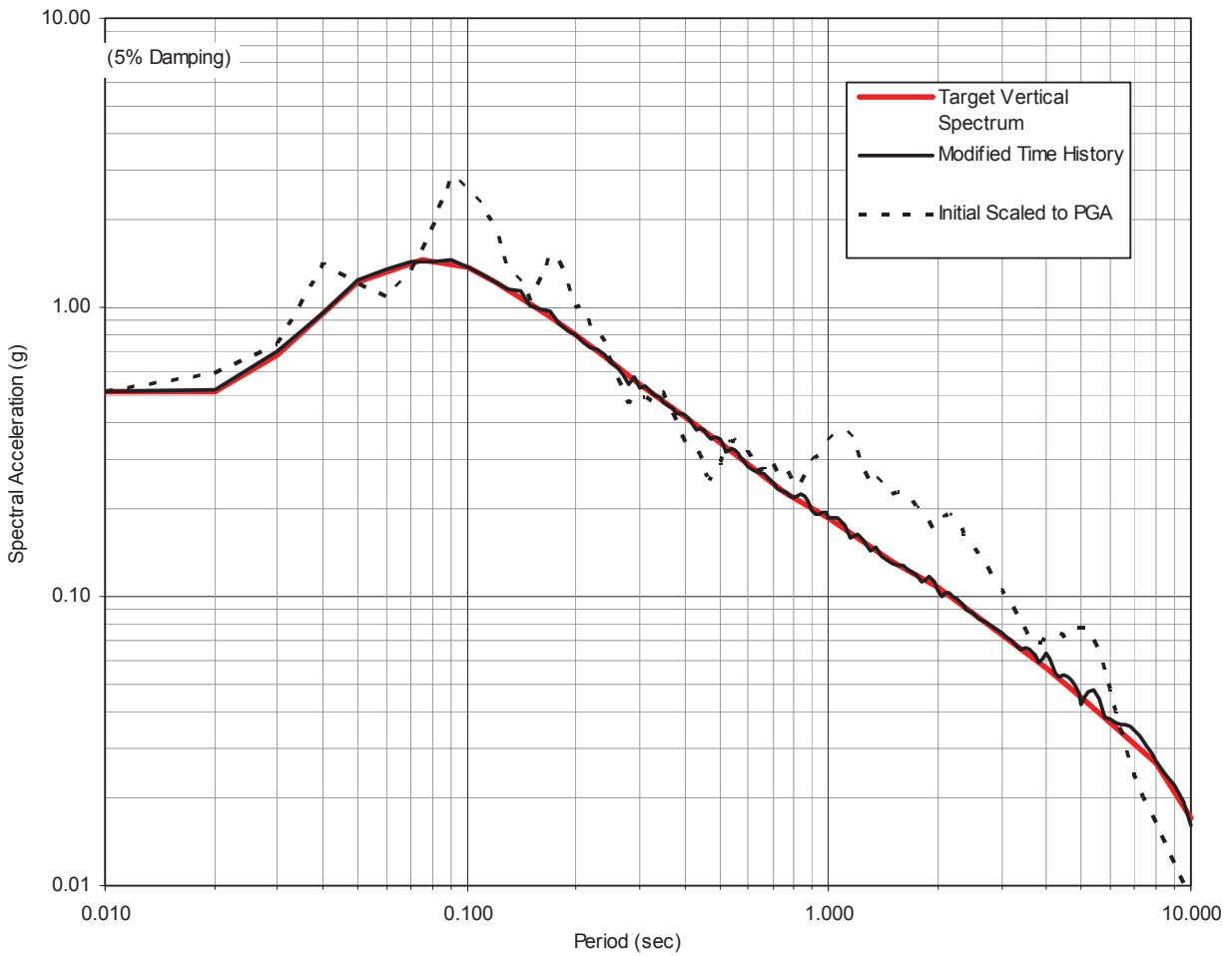
**Figure D-3. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 3 (f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**



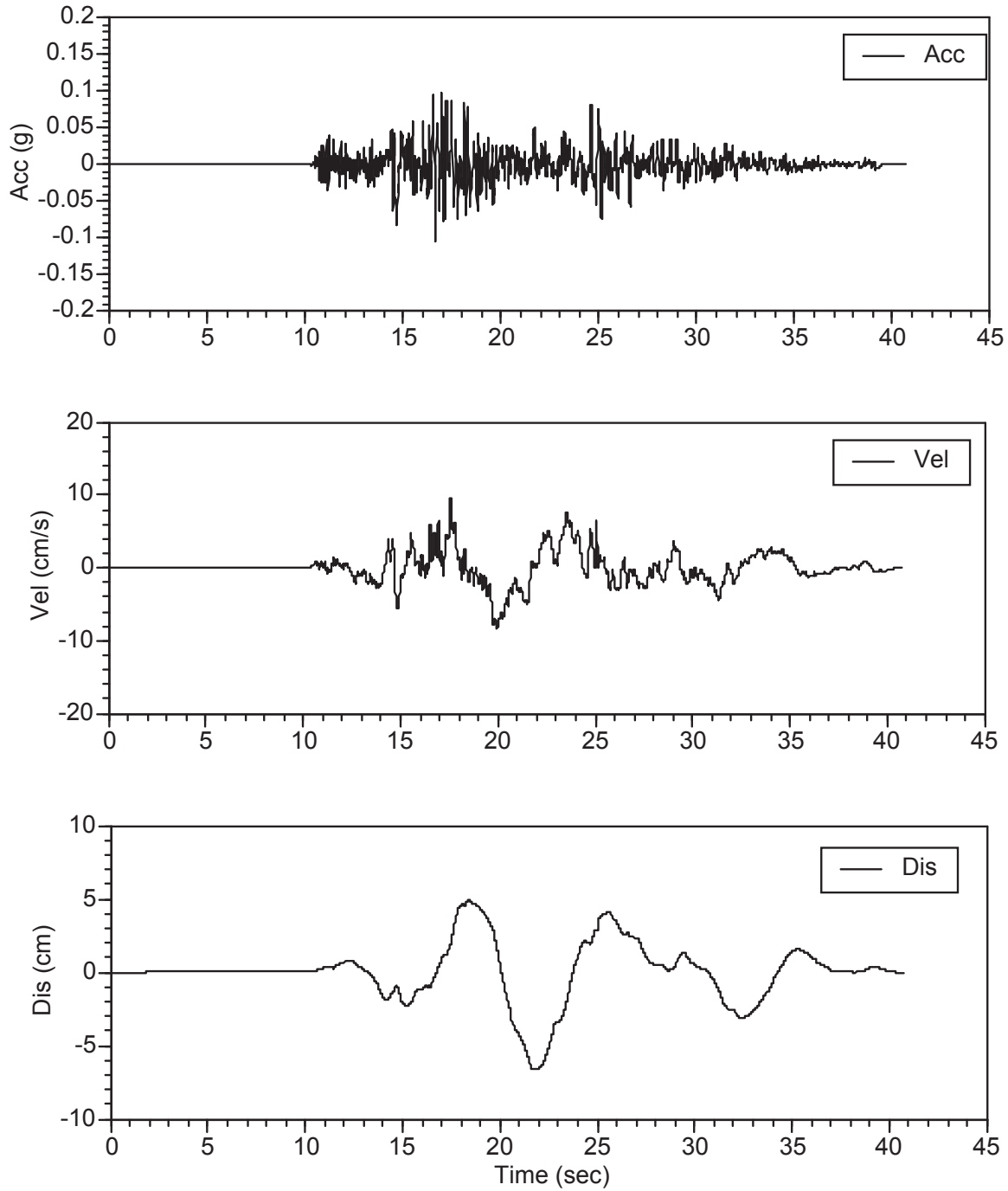
**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3  
(g) Initial Time History for FV Component**



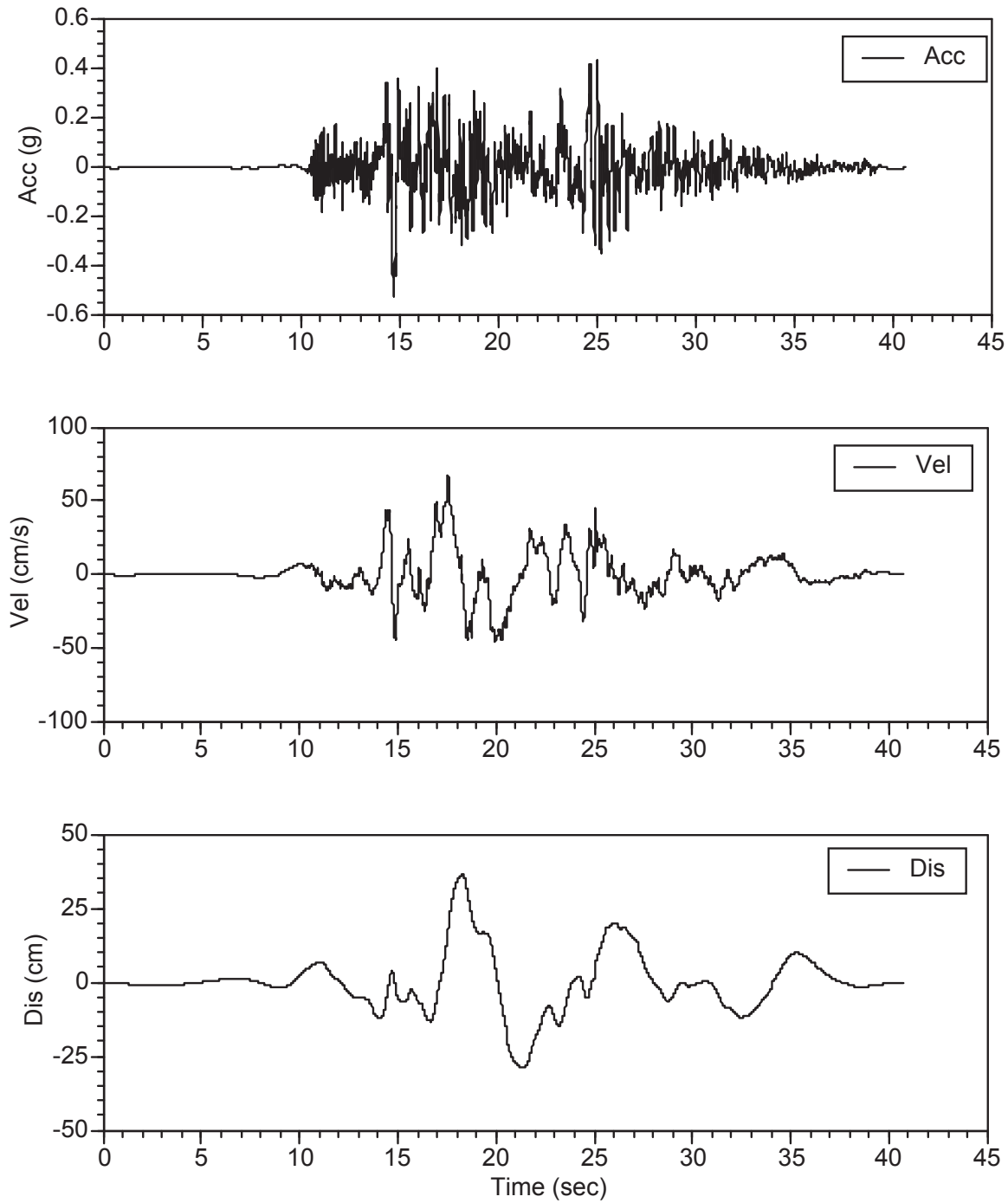
**Figure D-3. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 3  
(h) Modified Time History for FV Component**



**Figure D-3. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 3  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**

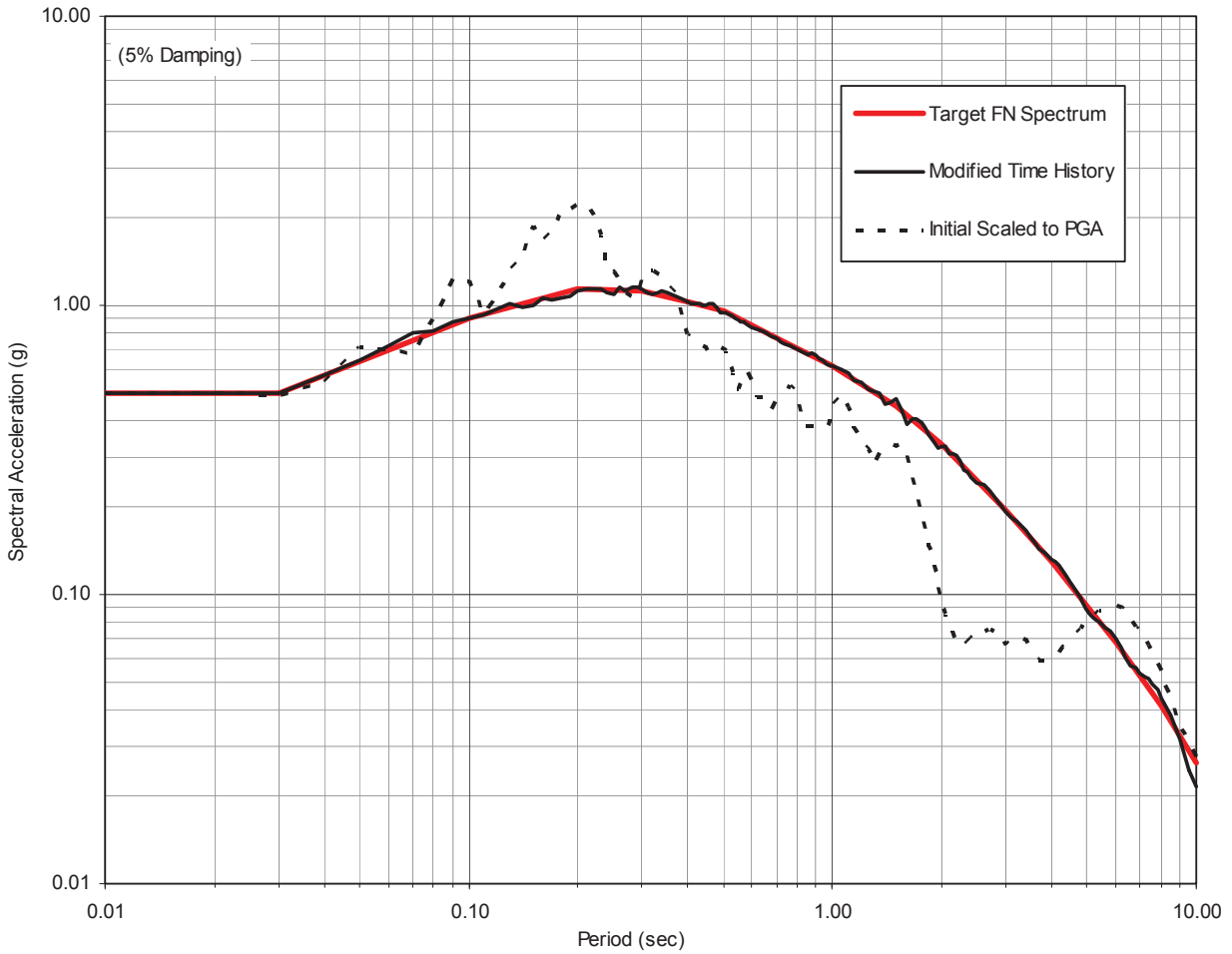


**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(a) Initial Time History for FN Component**

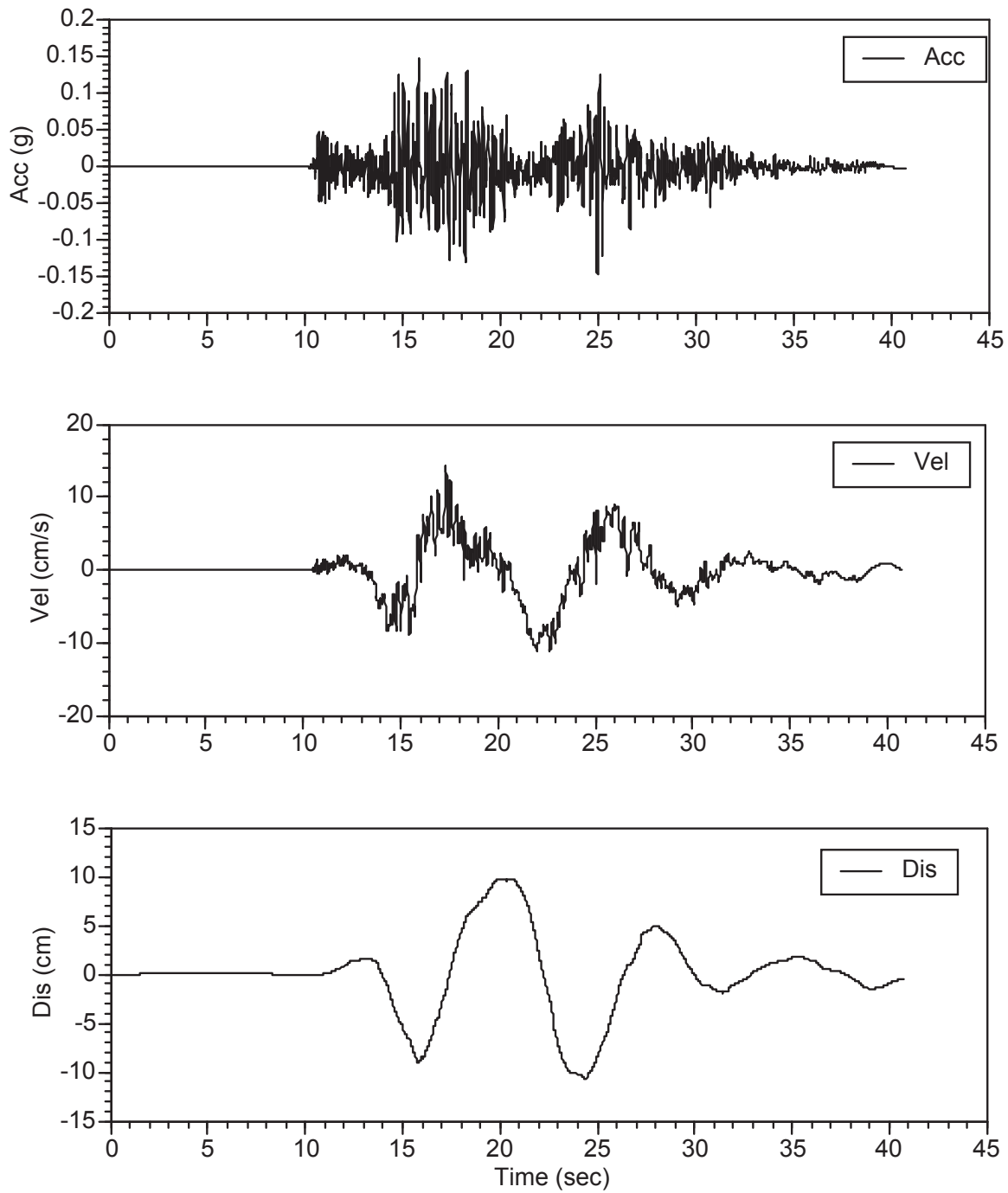


**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(b) Modified Time History for FN Component**

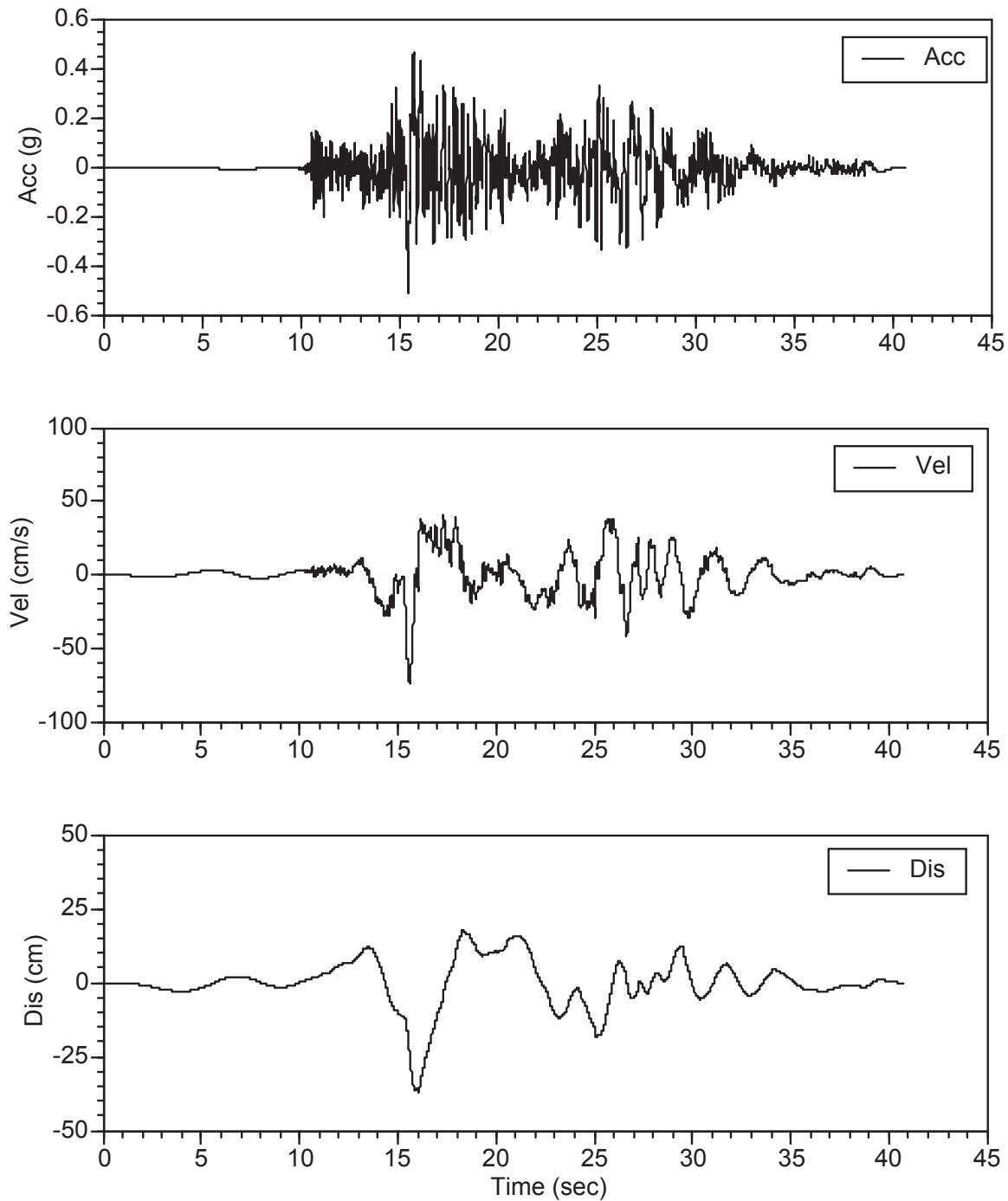




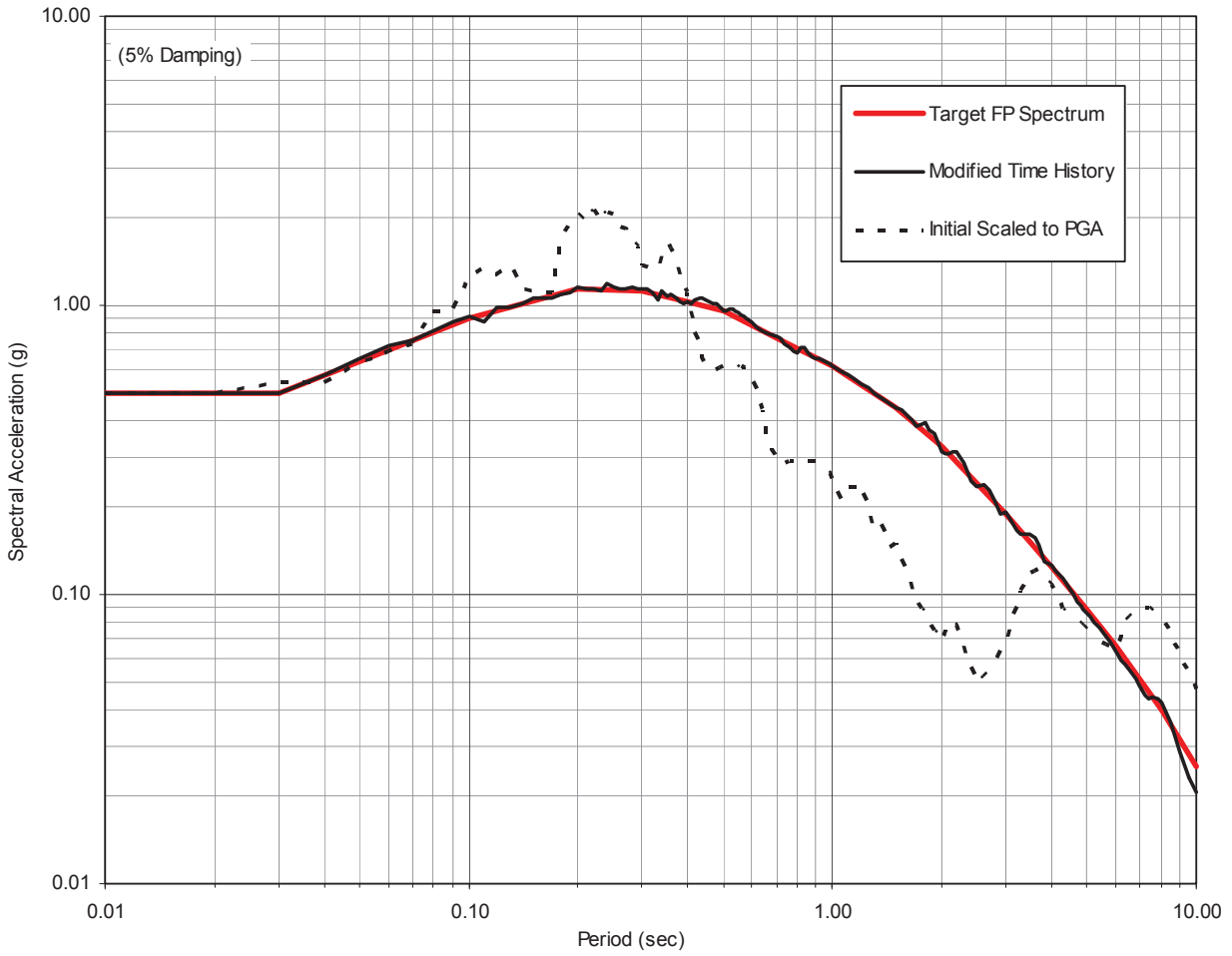
**Figure D-4. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 4  
(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**



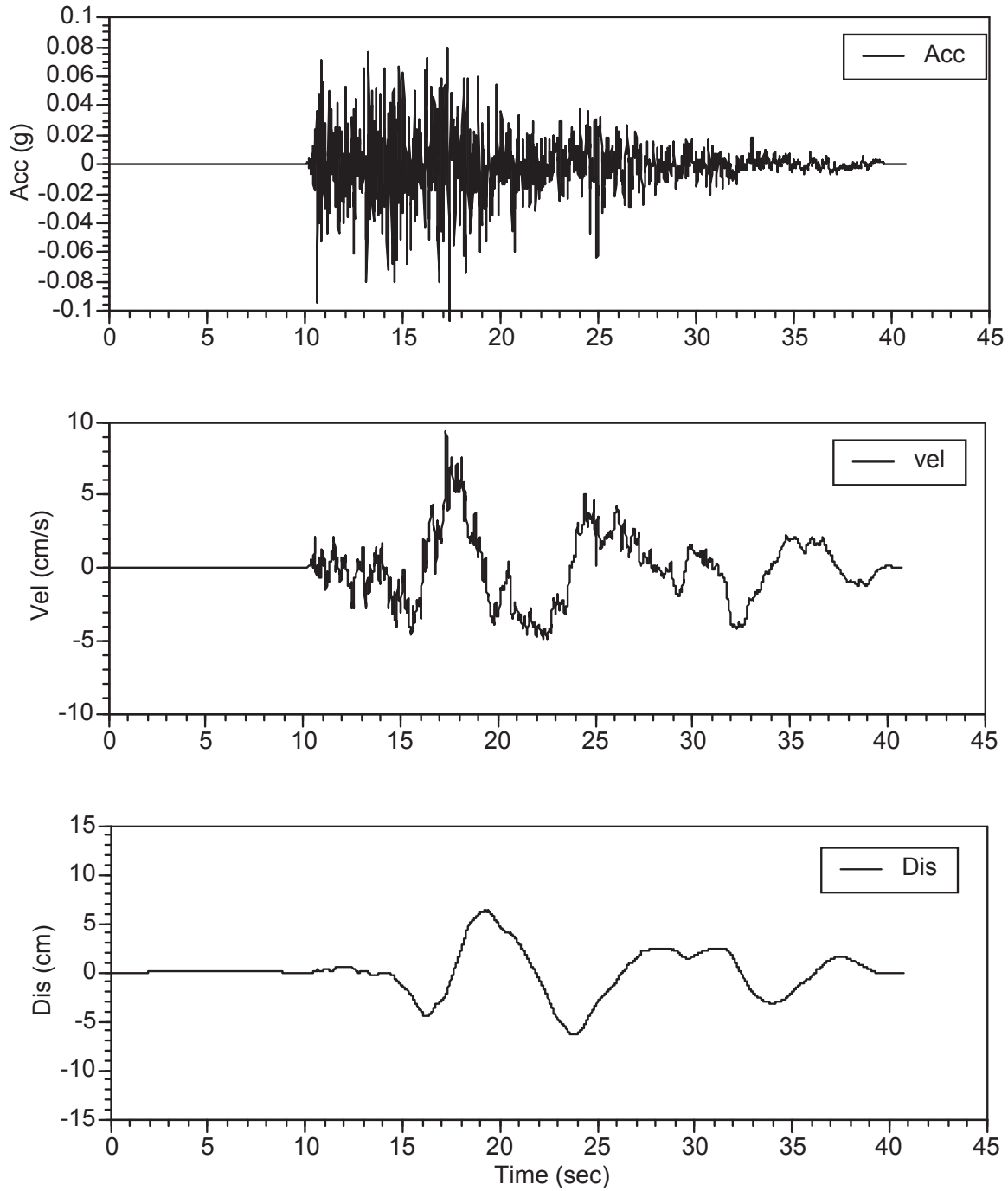
**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(d) Initial Time History for FP Component**



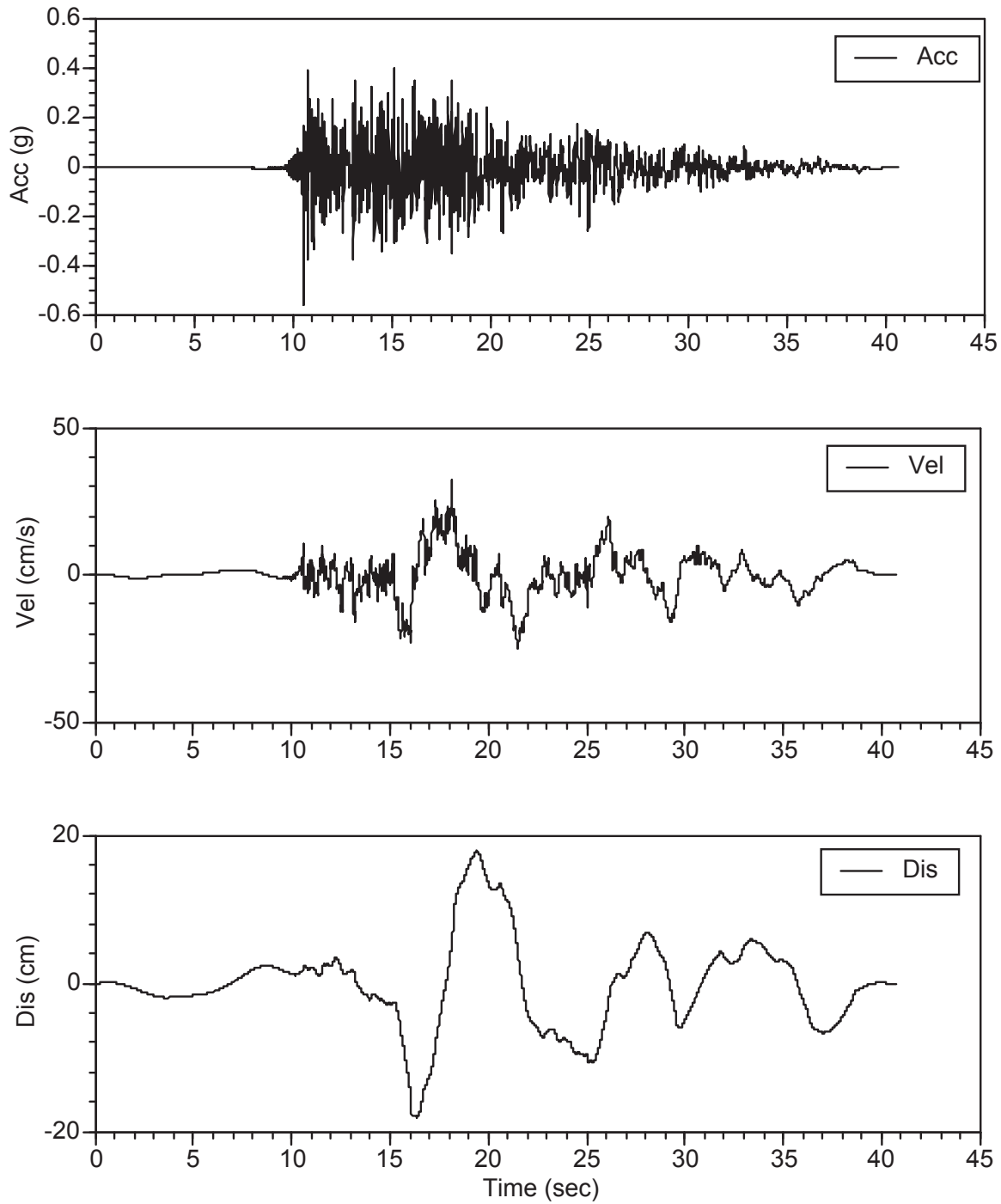
**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(e) Modified Time History for FP Component**



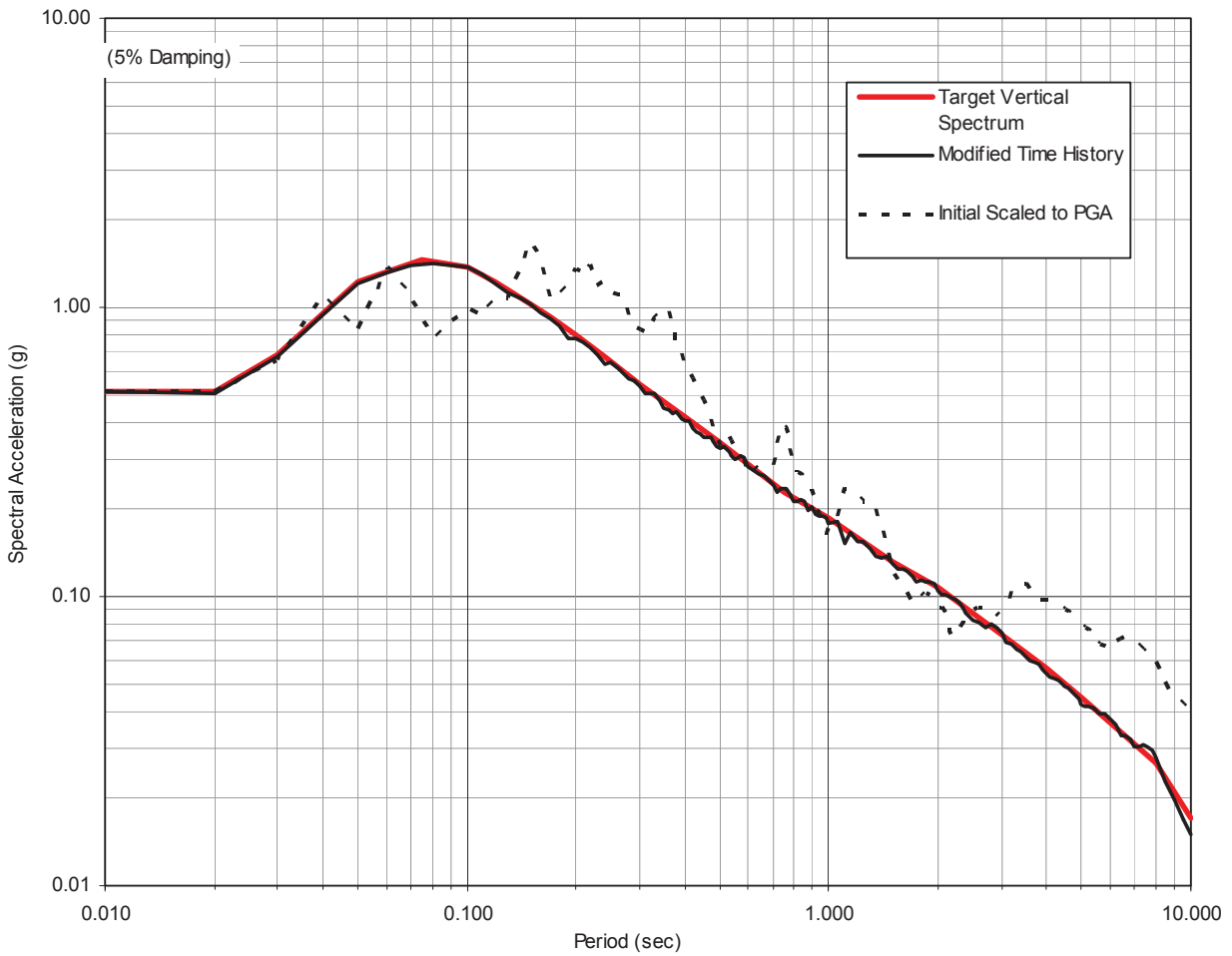
**Figure D-4. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 4 (f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**



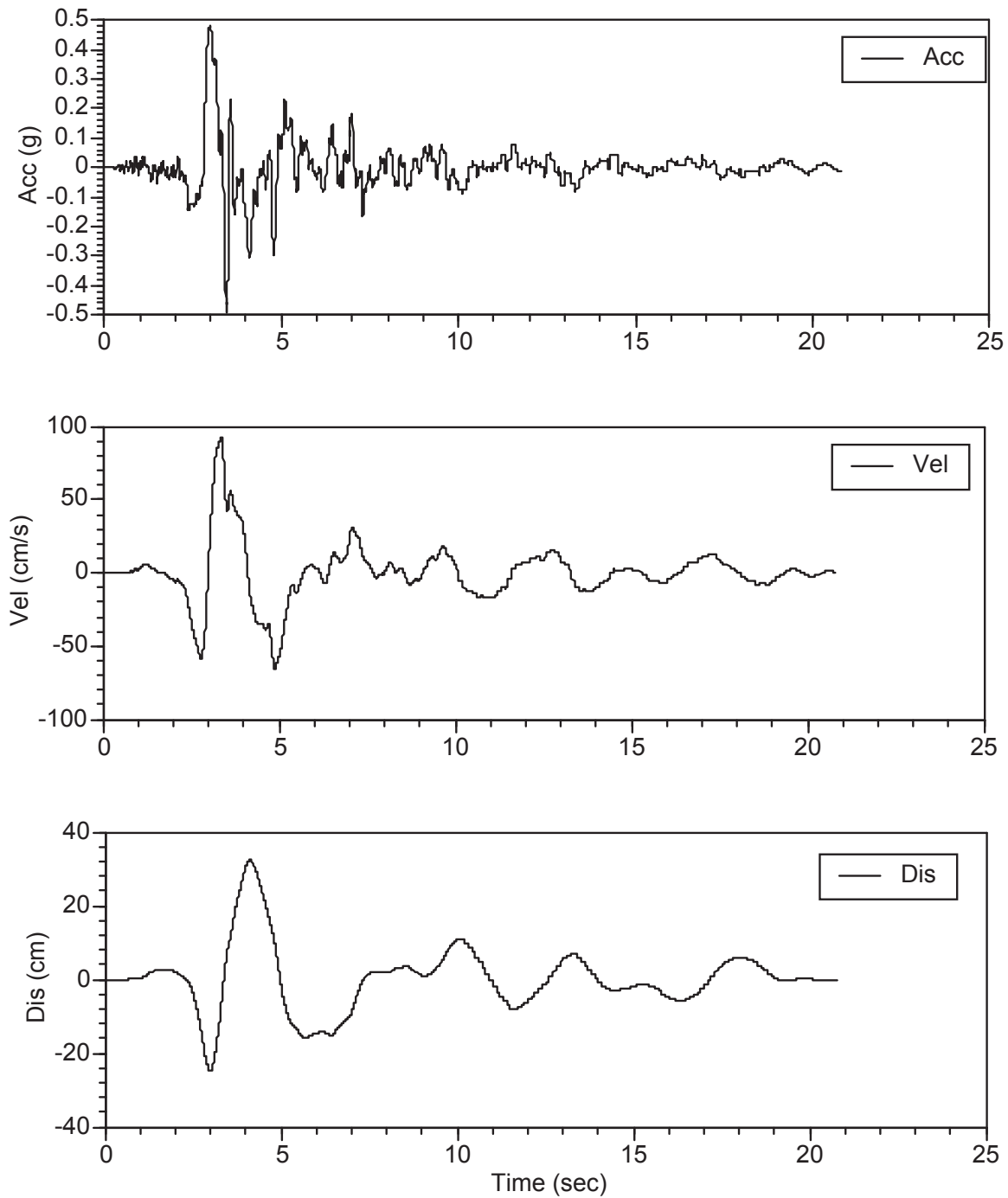
**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(g) Initial Time History for FV Component**



**Figure D-4. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 4  
(h) Modified Time History for FV Component**

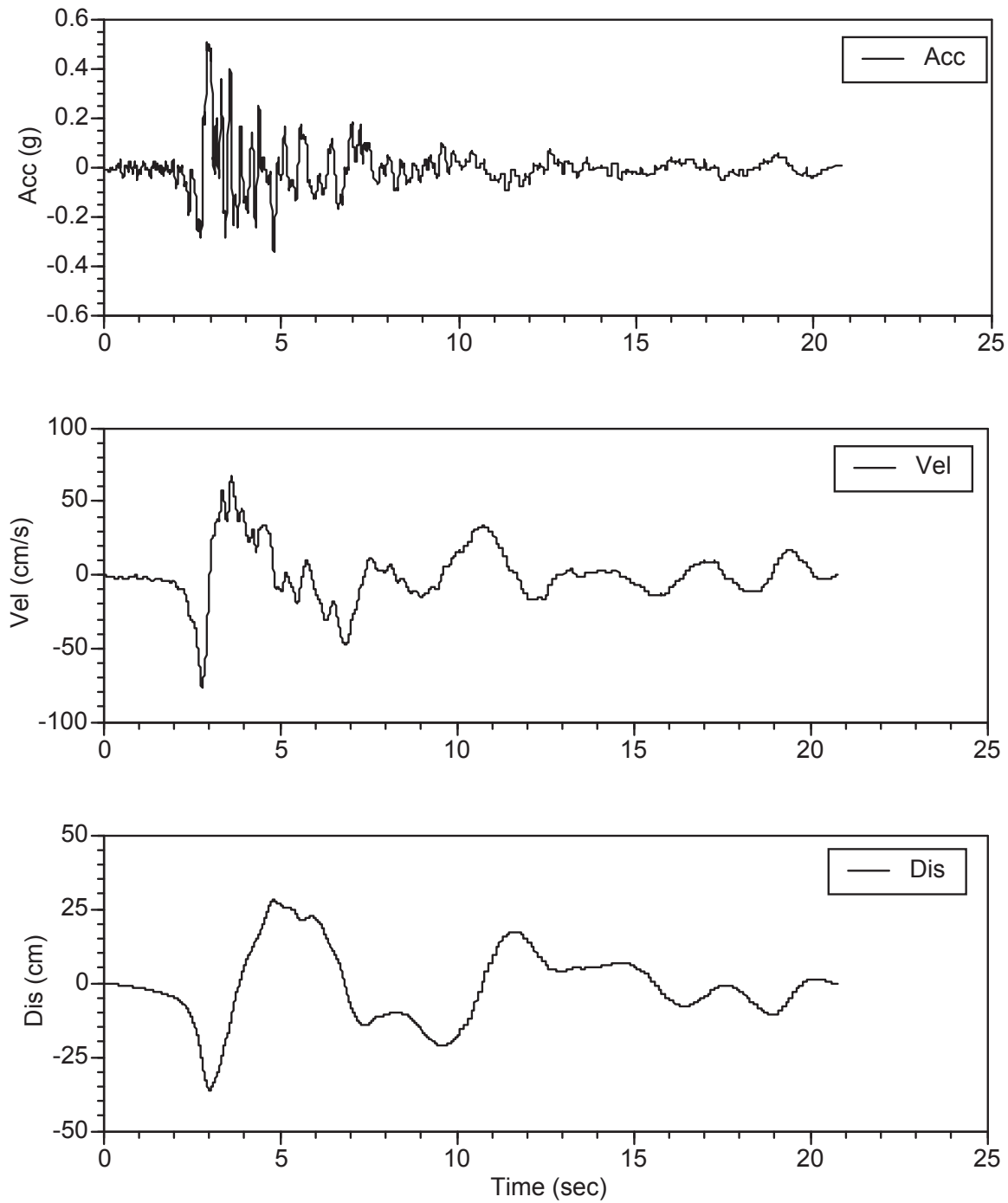


**Figure D-4. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 4  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**

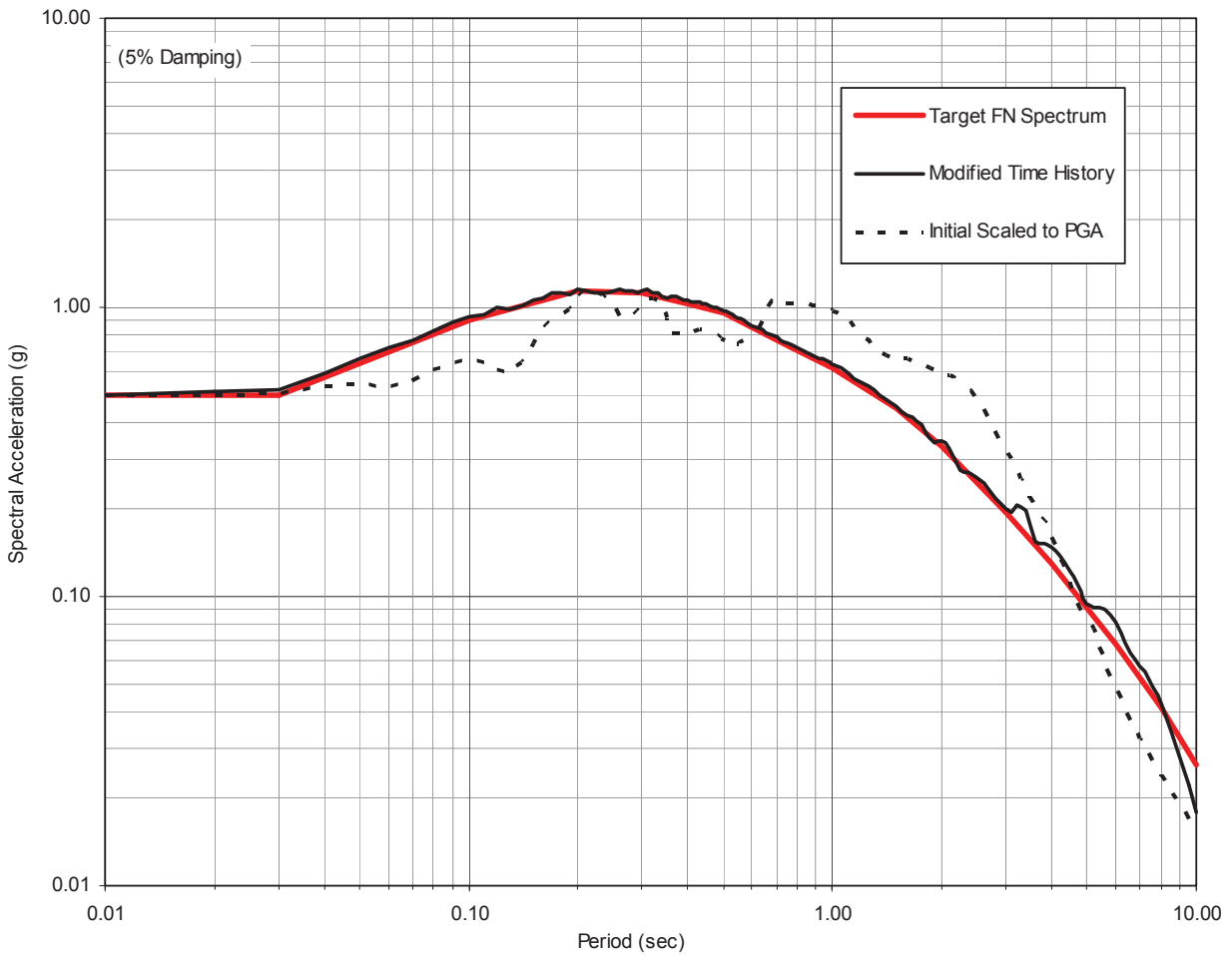


**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5  
(a) Initial Time History for FN Component**

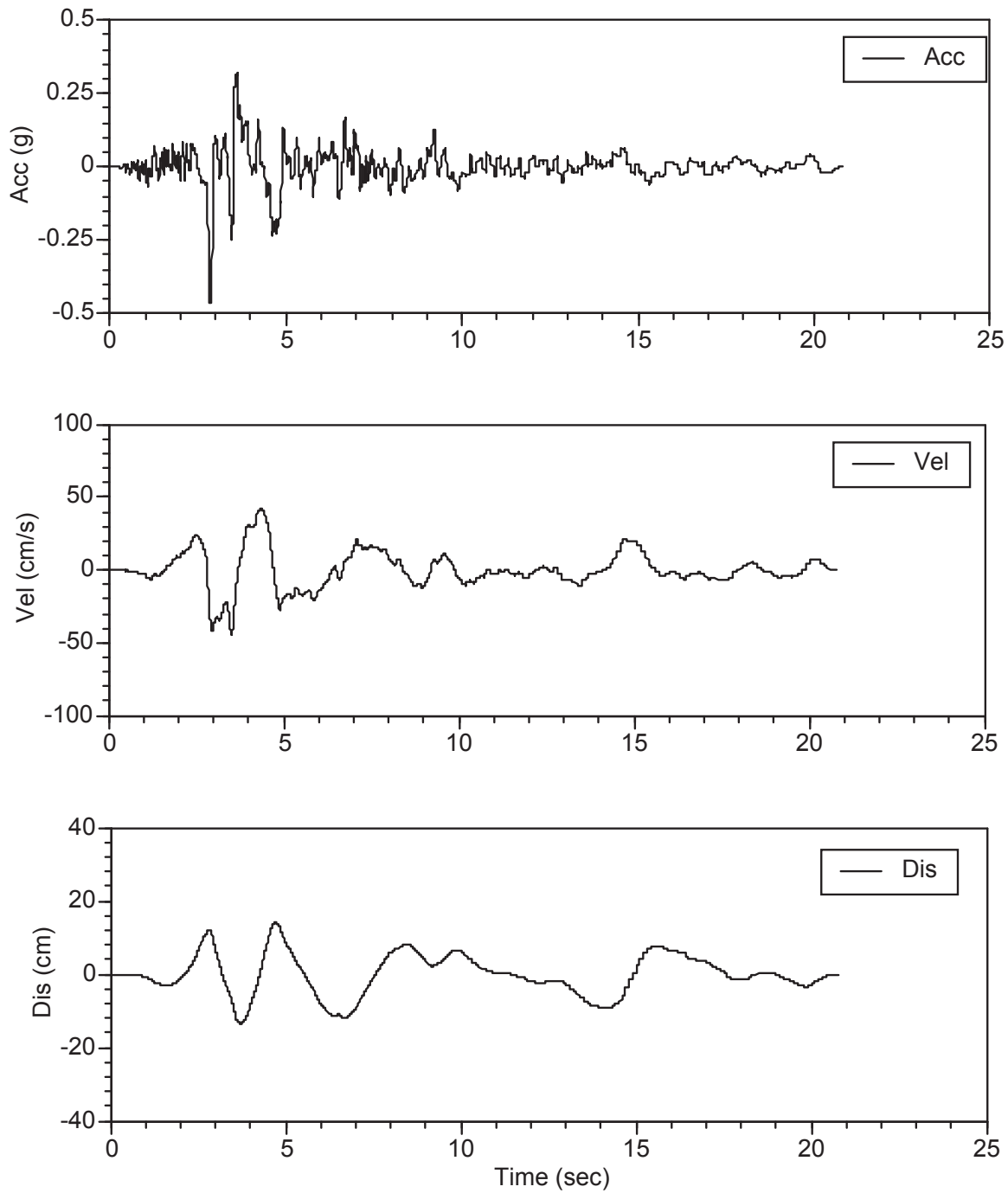




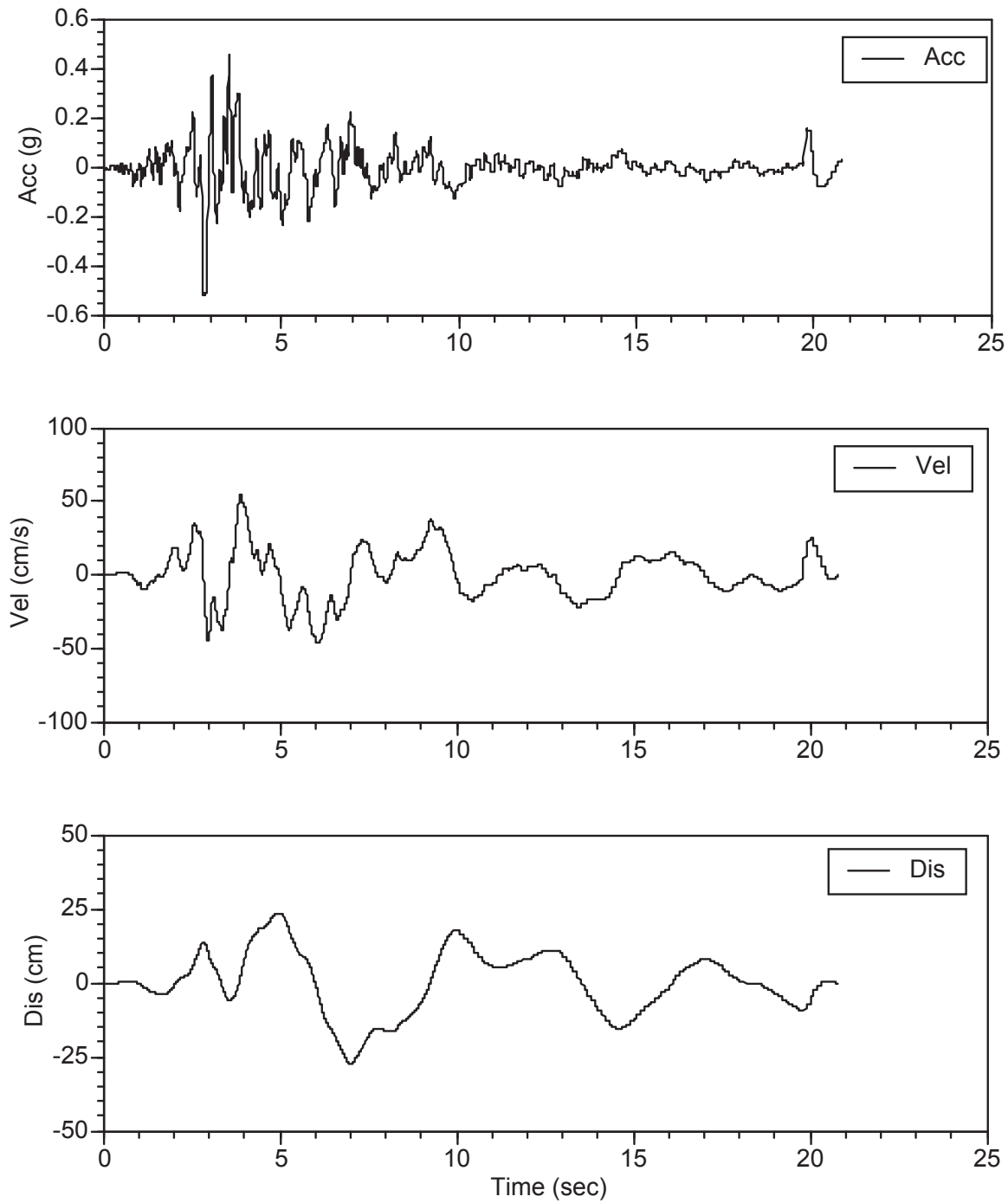
**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5  
(b) Modified Time History for FN Component**



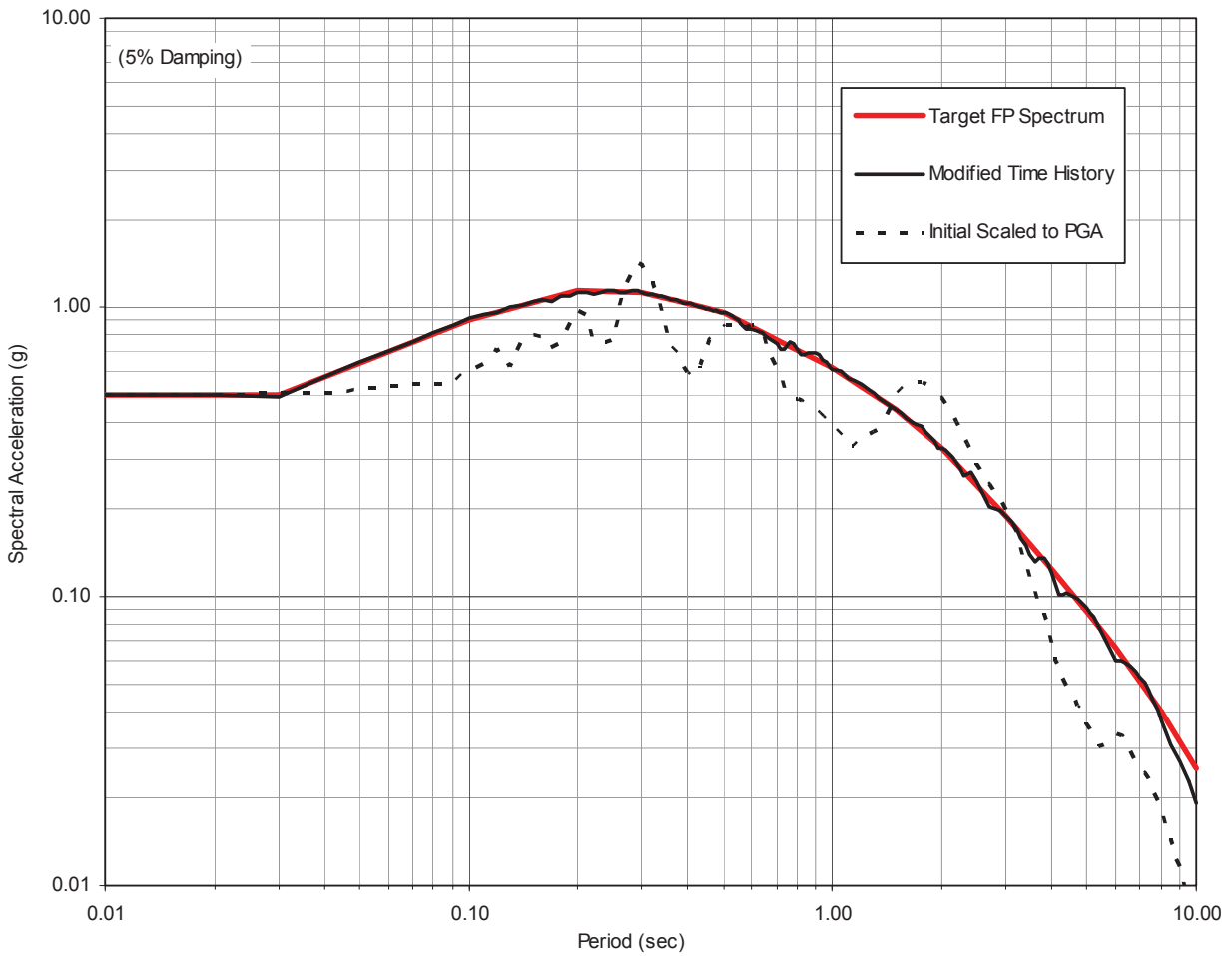
**Figure D-5. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 5  
(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**



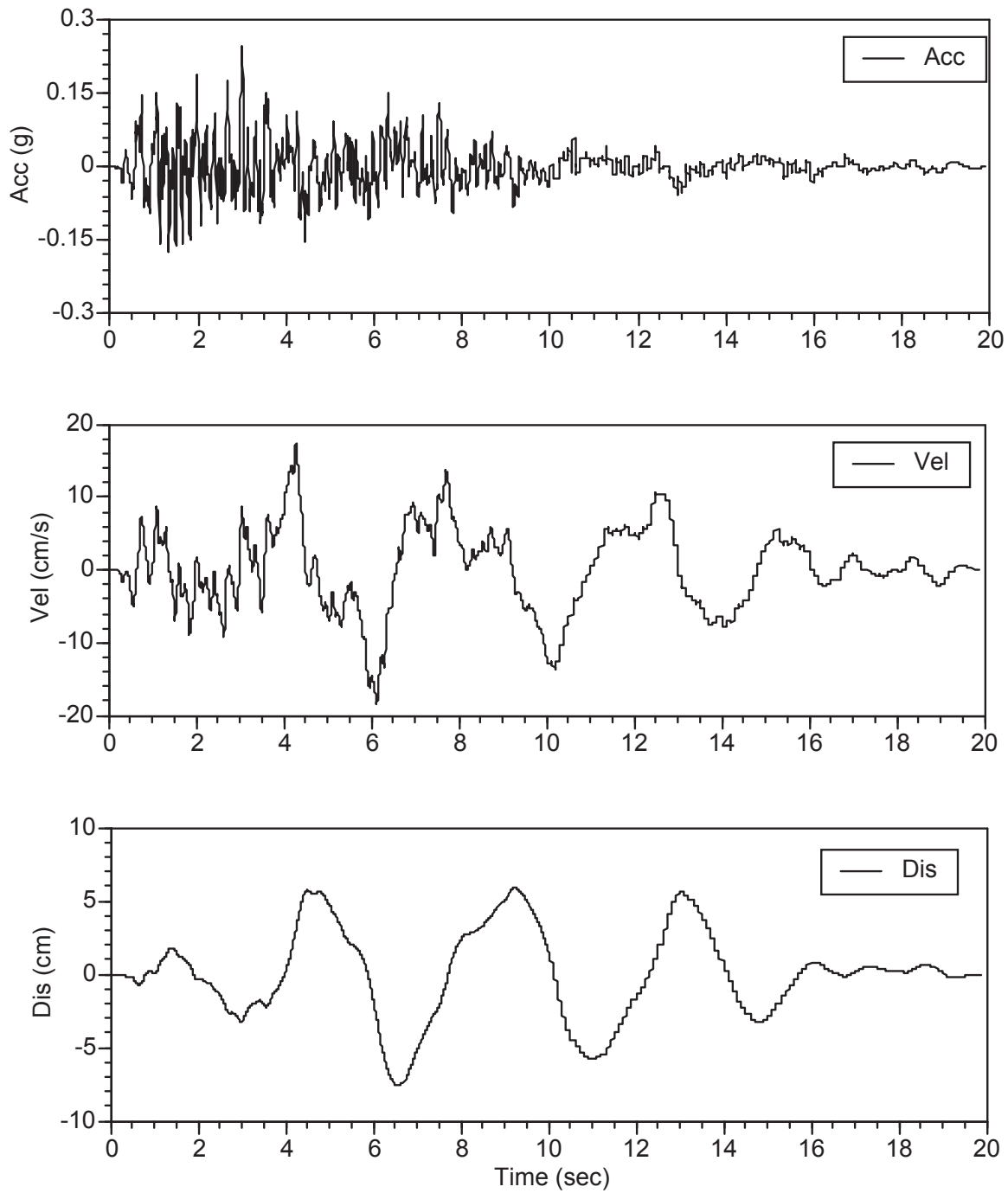
**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5  
(d) Initial Time History for FP Component**



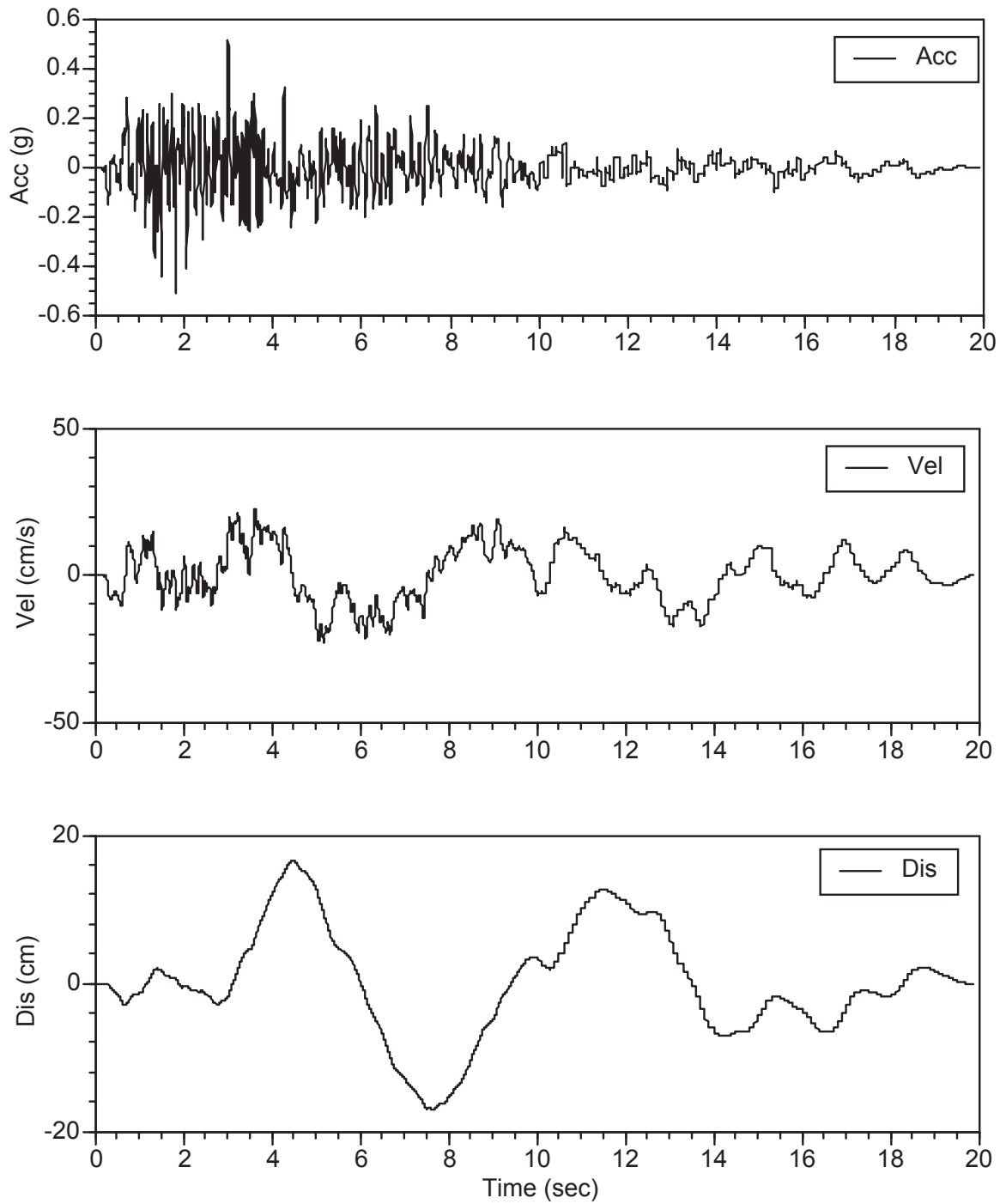
**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5  
(e) Modified Time History for FP Component**



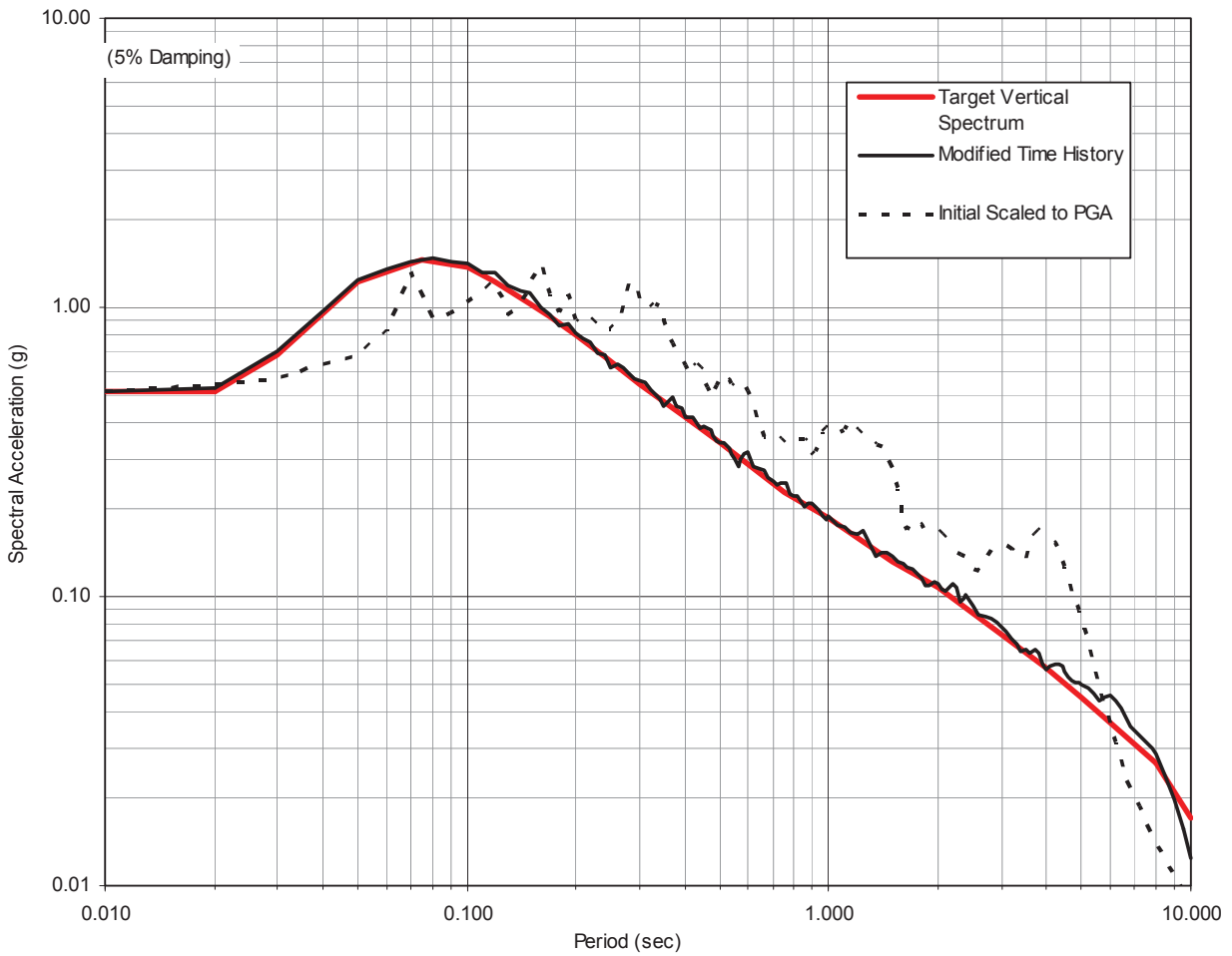
**Figure D-5. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 5 (f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**



**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5 (g) Initial Time History for FV Component**

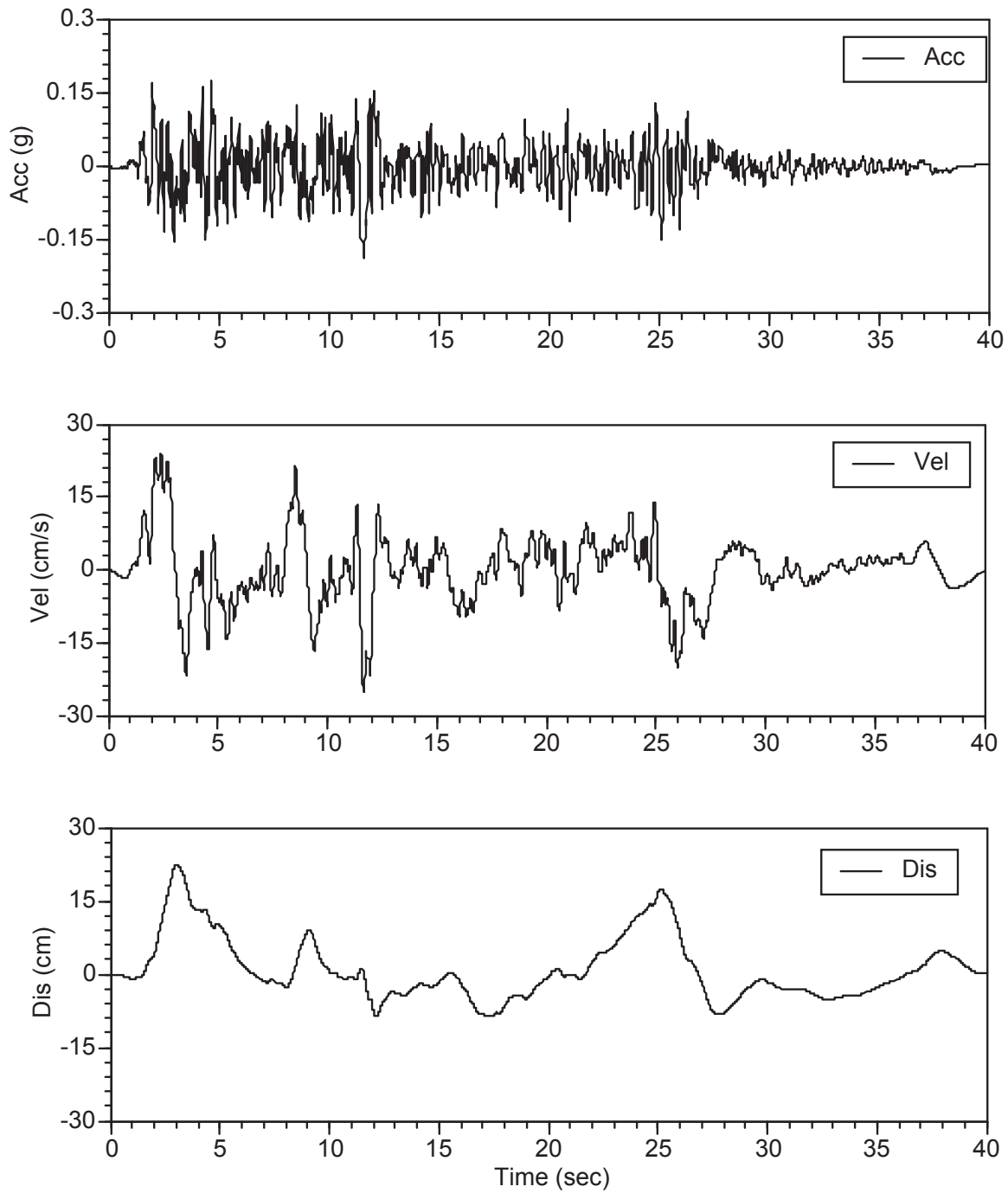


**Figure D-5. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 5  
(h) Modified Time History for FV Component**

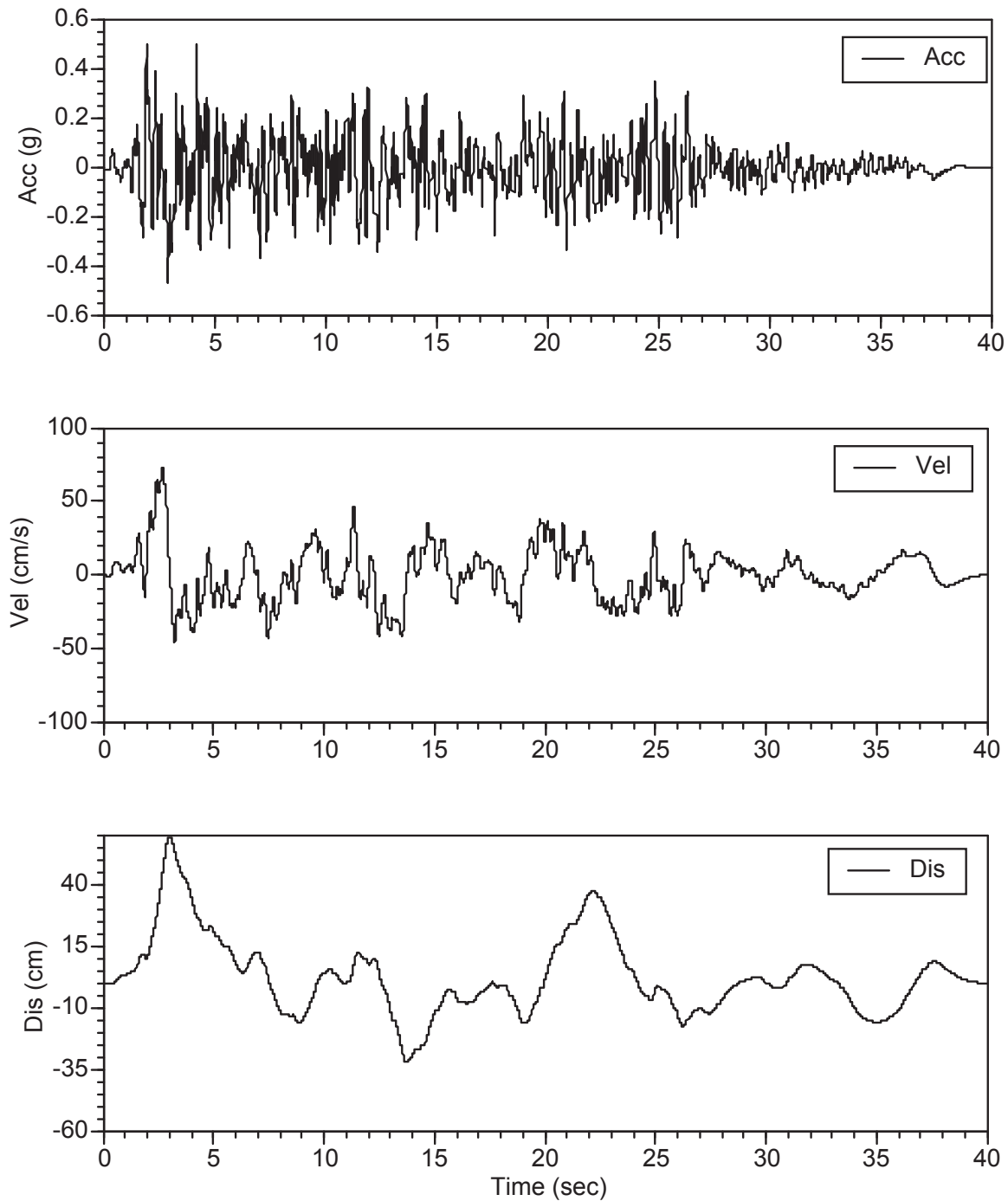


**Figure D-5. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 5  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**

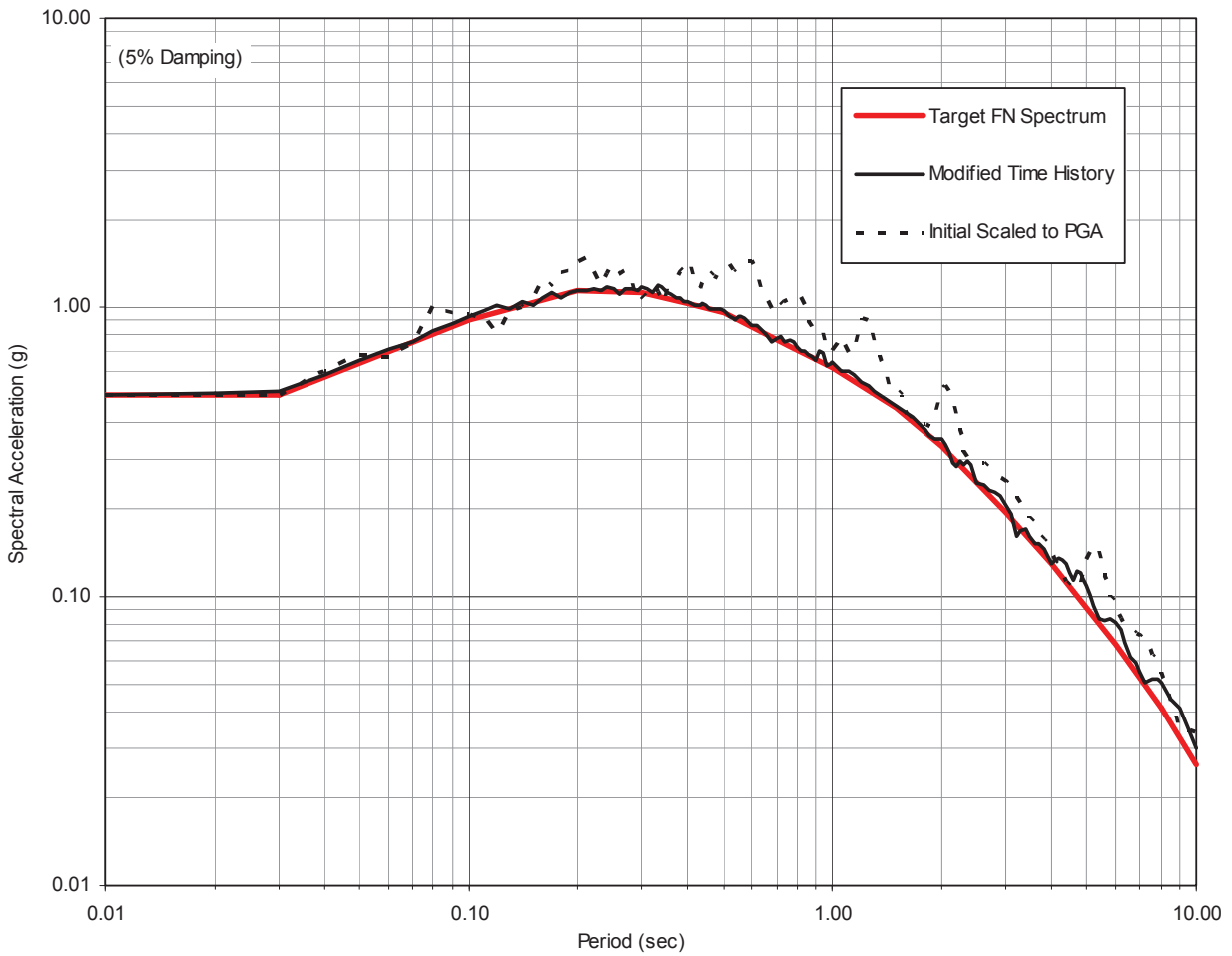




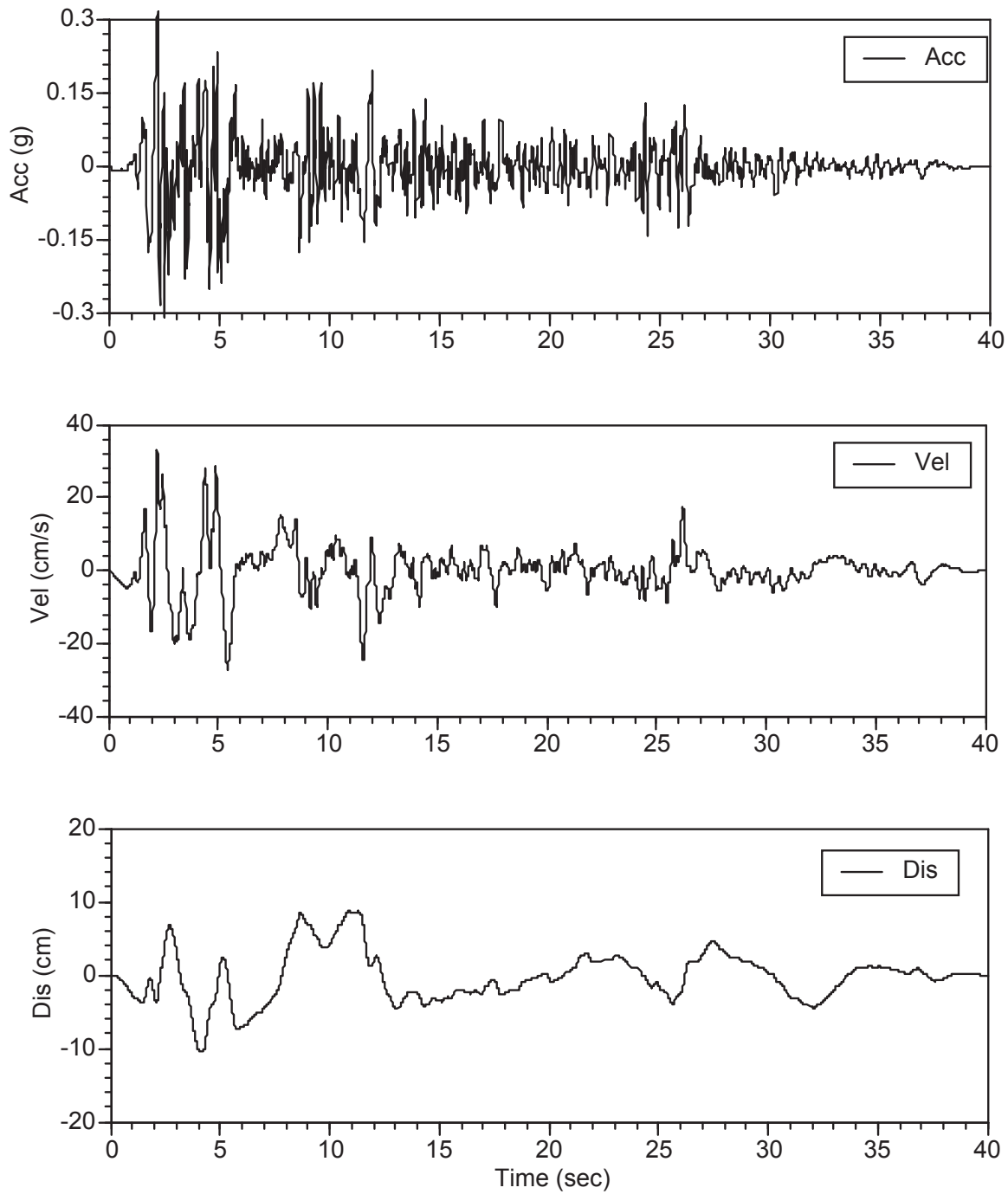
**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6**  
**(a) Initial Time History for FN Component**



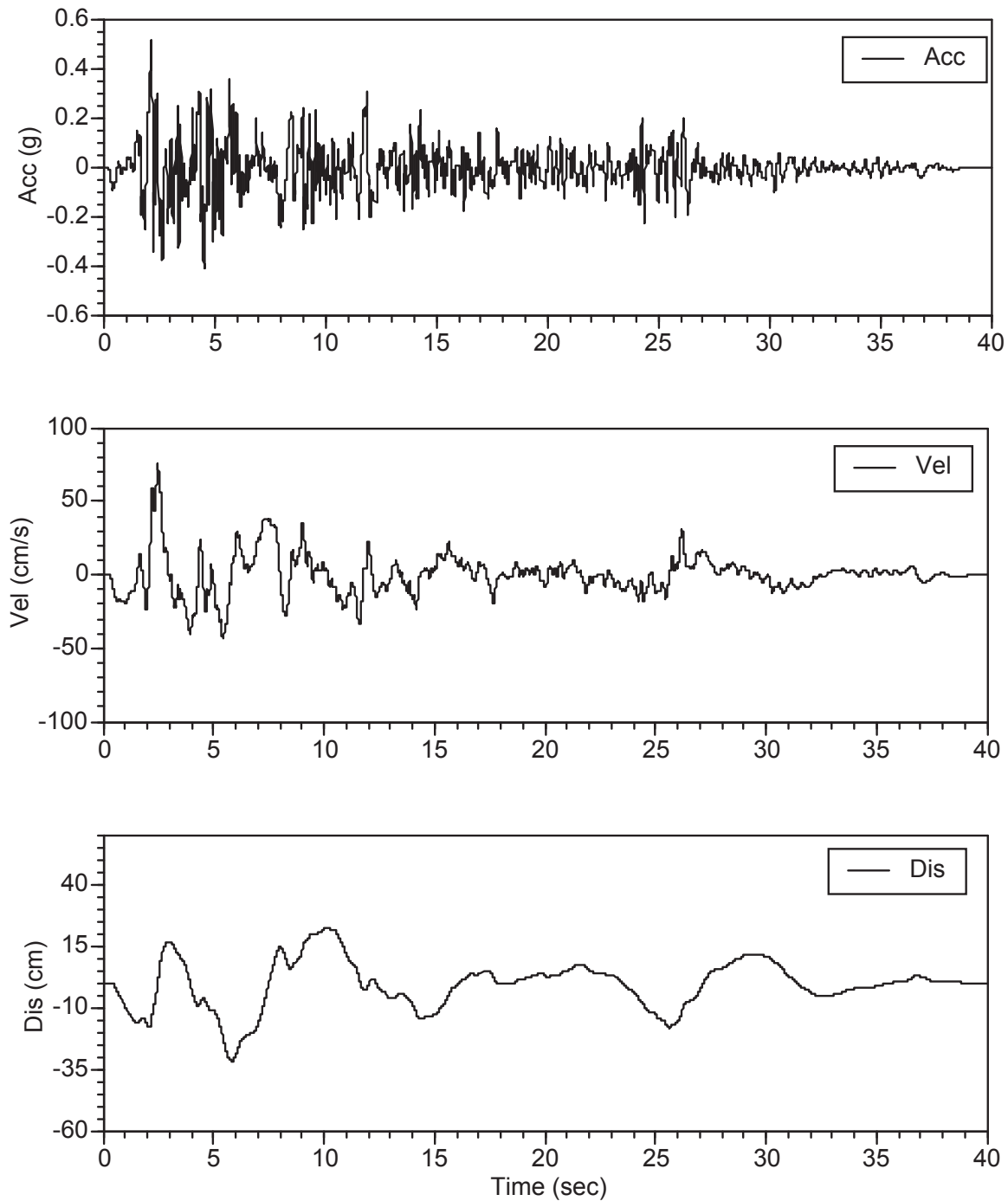
**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6  
(b) Modified Time History for FN Component**



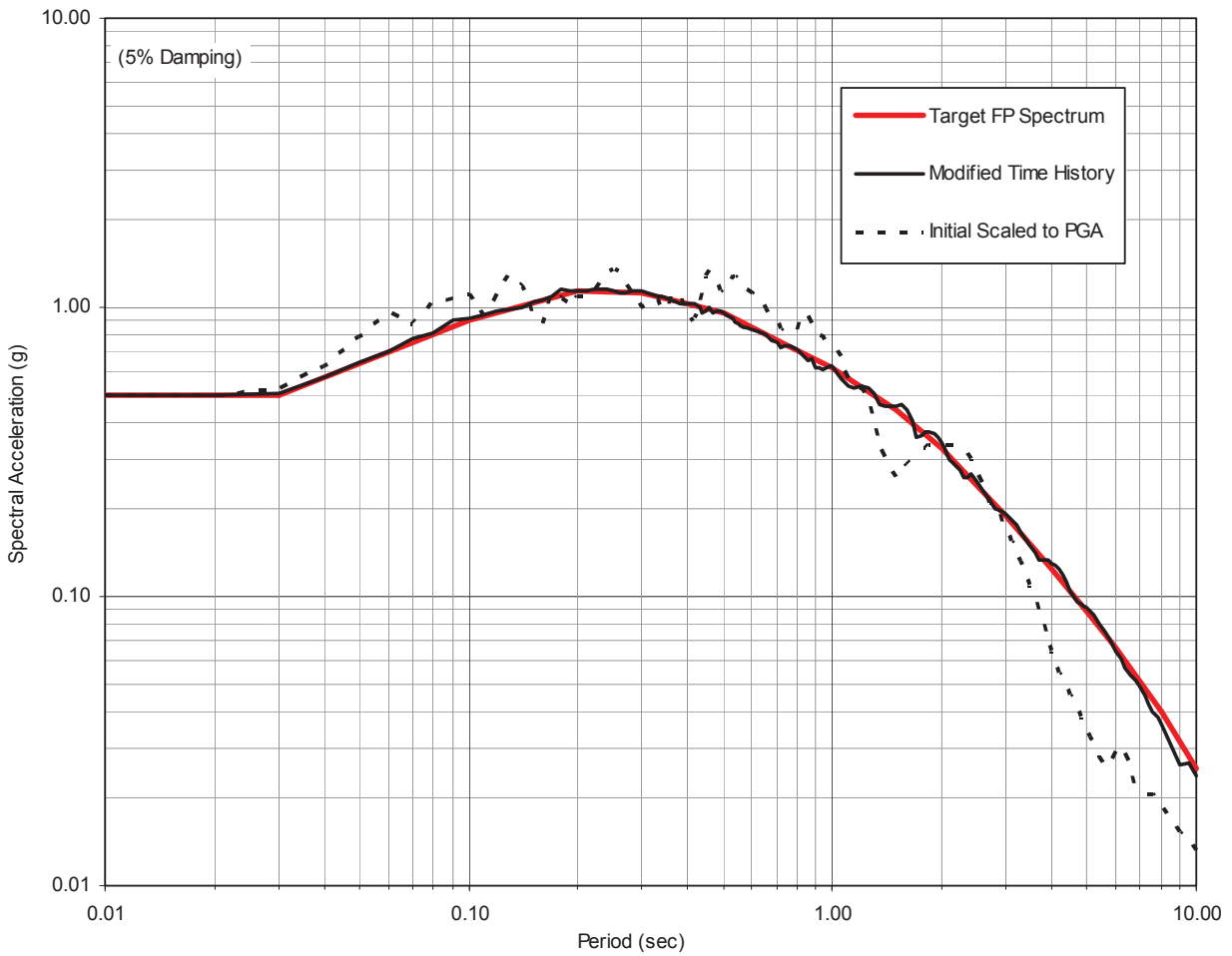
**Figure D-6. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 6**  
**(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time**  
**Histories, FN Component**



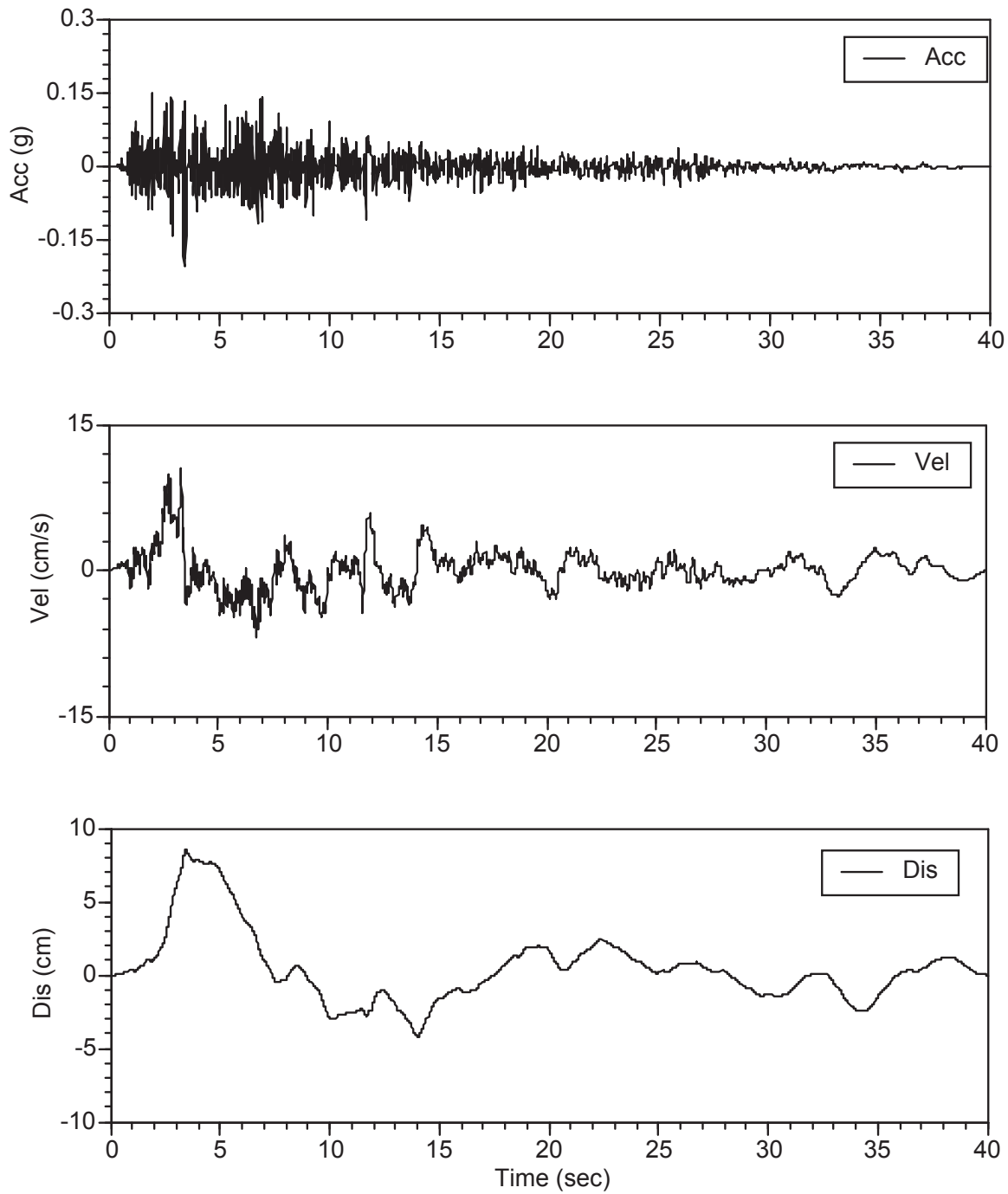
**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6  
(d) Initial Time History for FP Component**



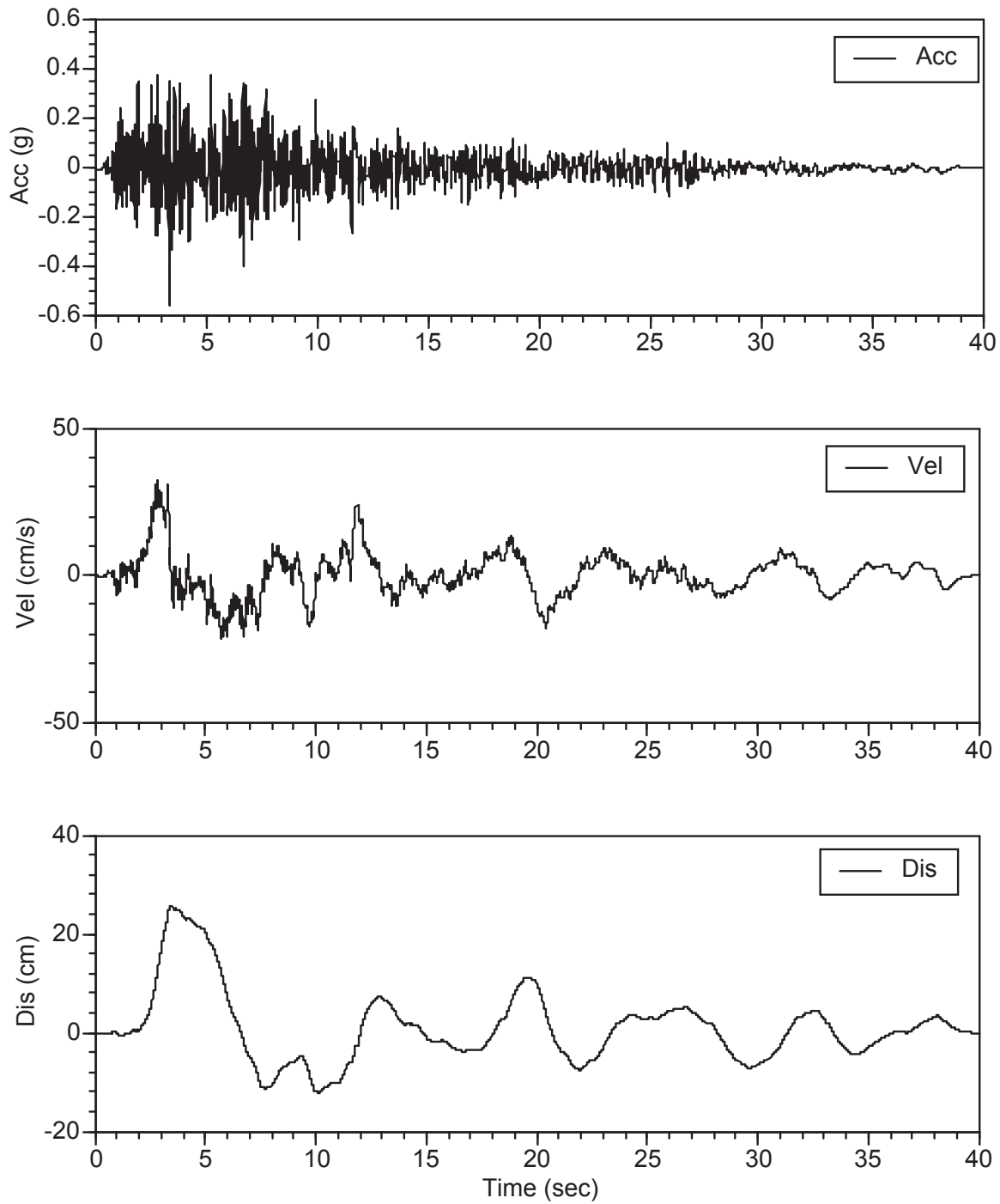
**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6  
(e) Modified Time History for FP Component**



**Figure D-6. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 6 (f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**

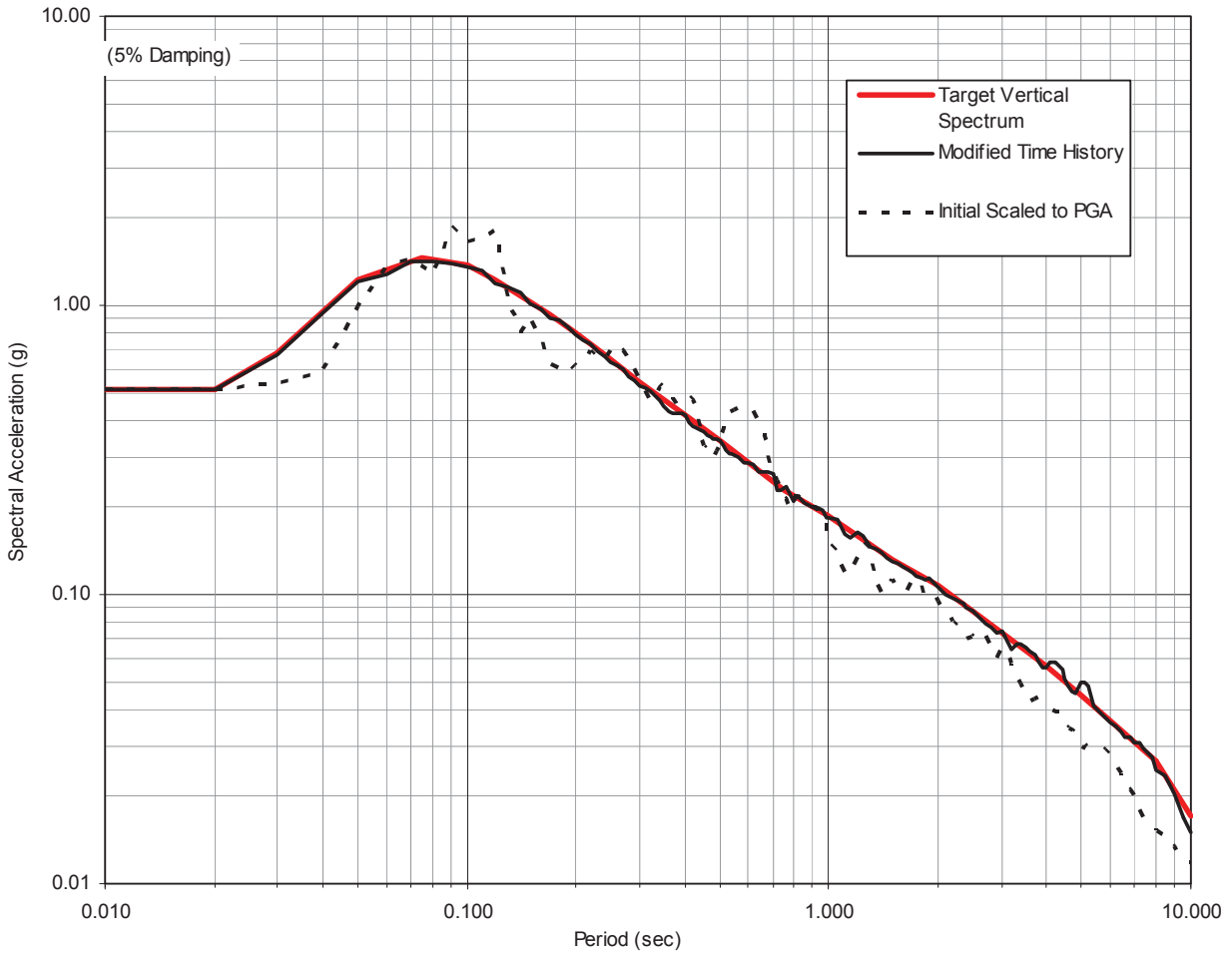


**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6 (g) Initial Time History for FV Component**

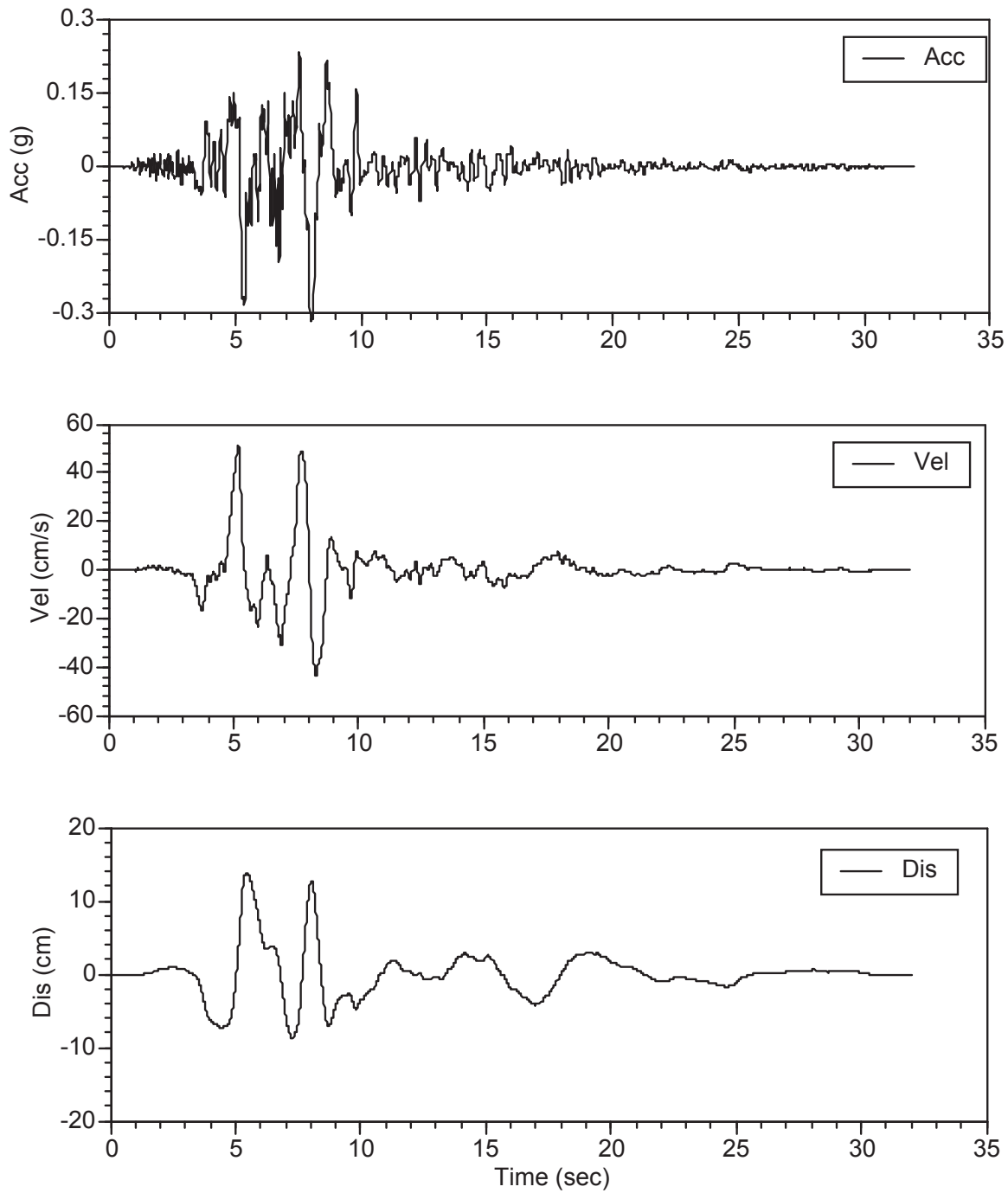


**Figure D-6. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 6 (h) Modified Time History for FV Component**

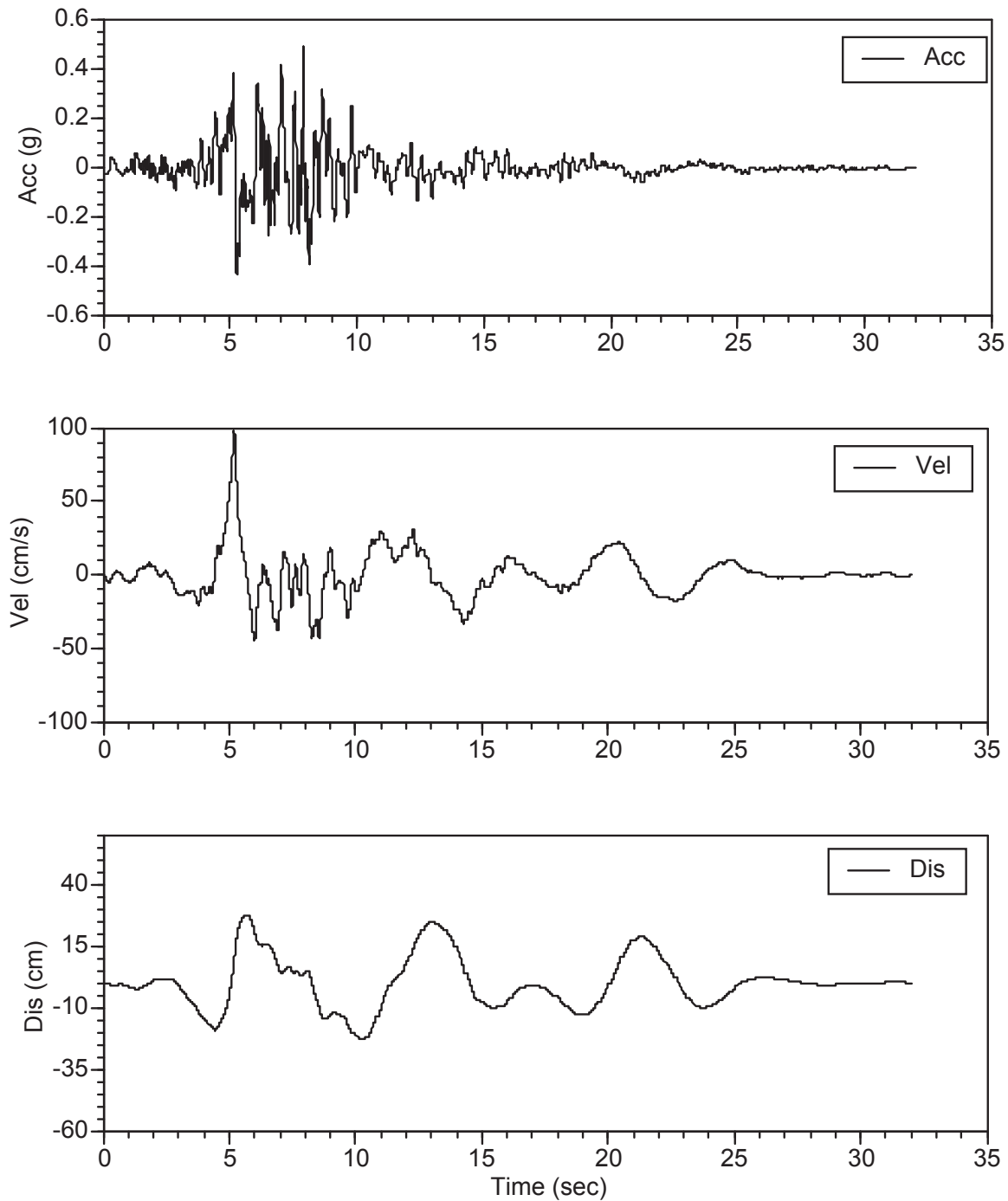




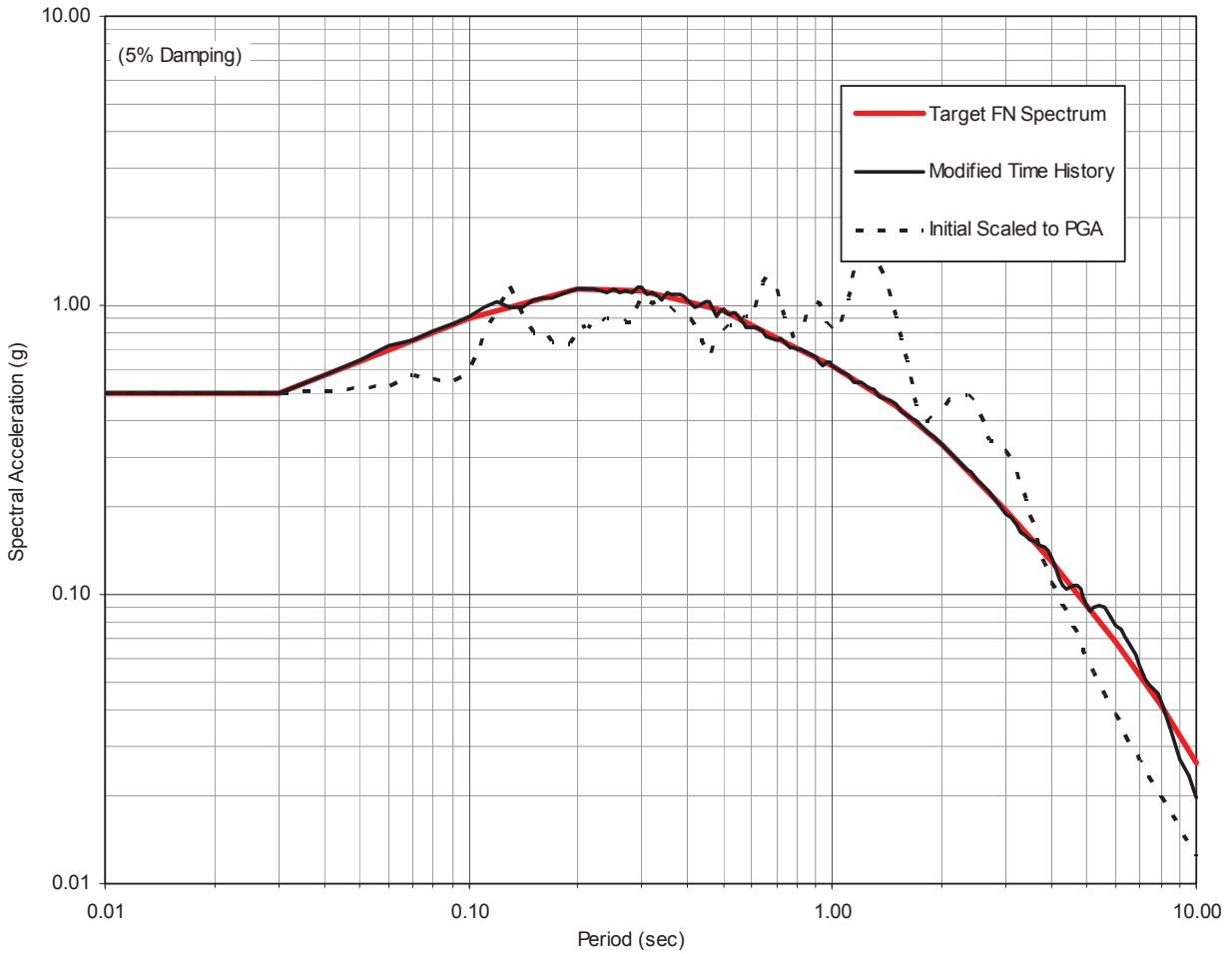
**Figure D-6. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 6**  
**(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**



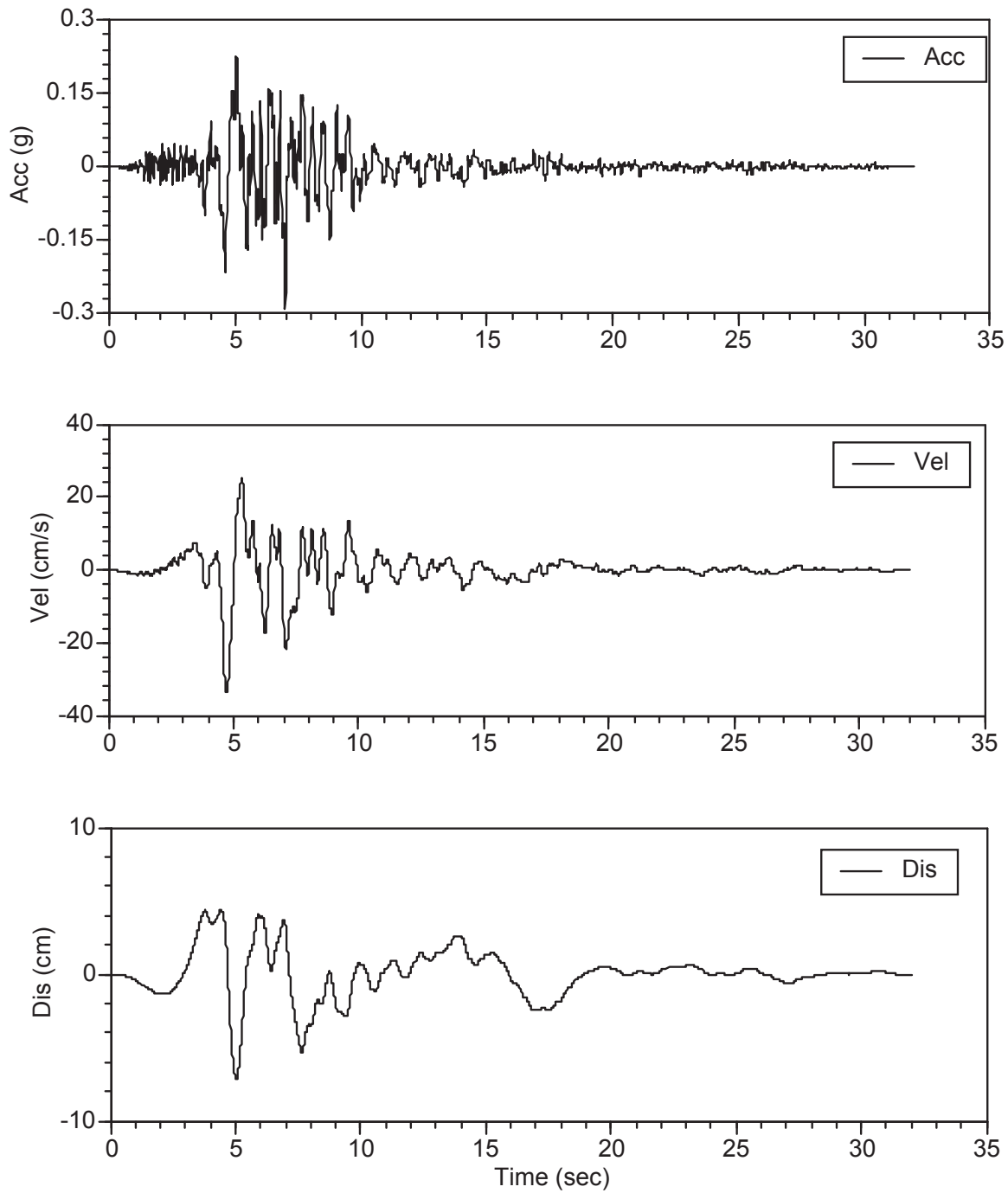
**Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(a) Initial Time History for FN Component**



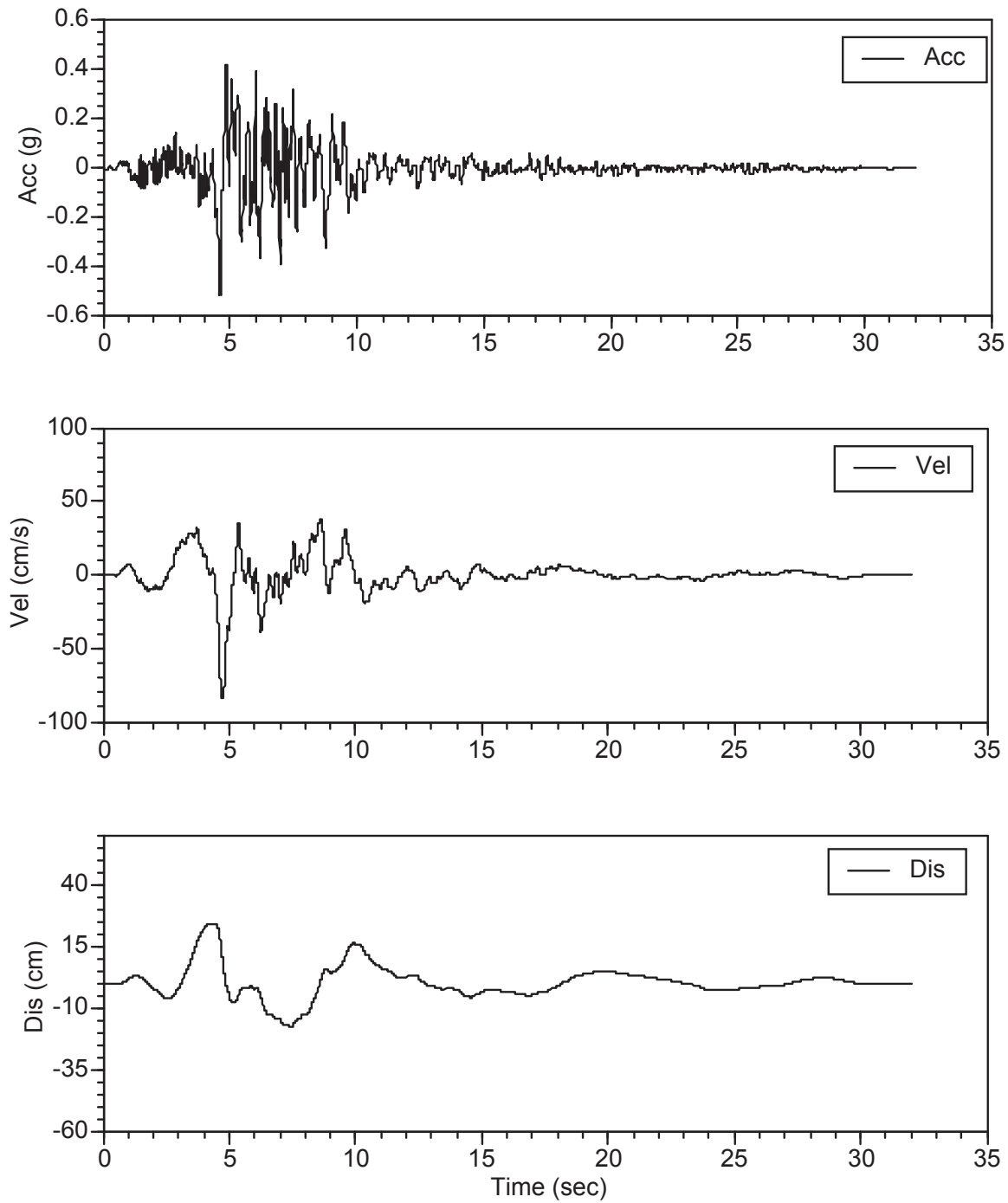
**Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(b) Modified Time History for FN Component**



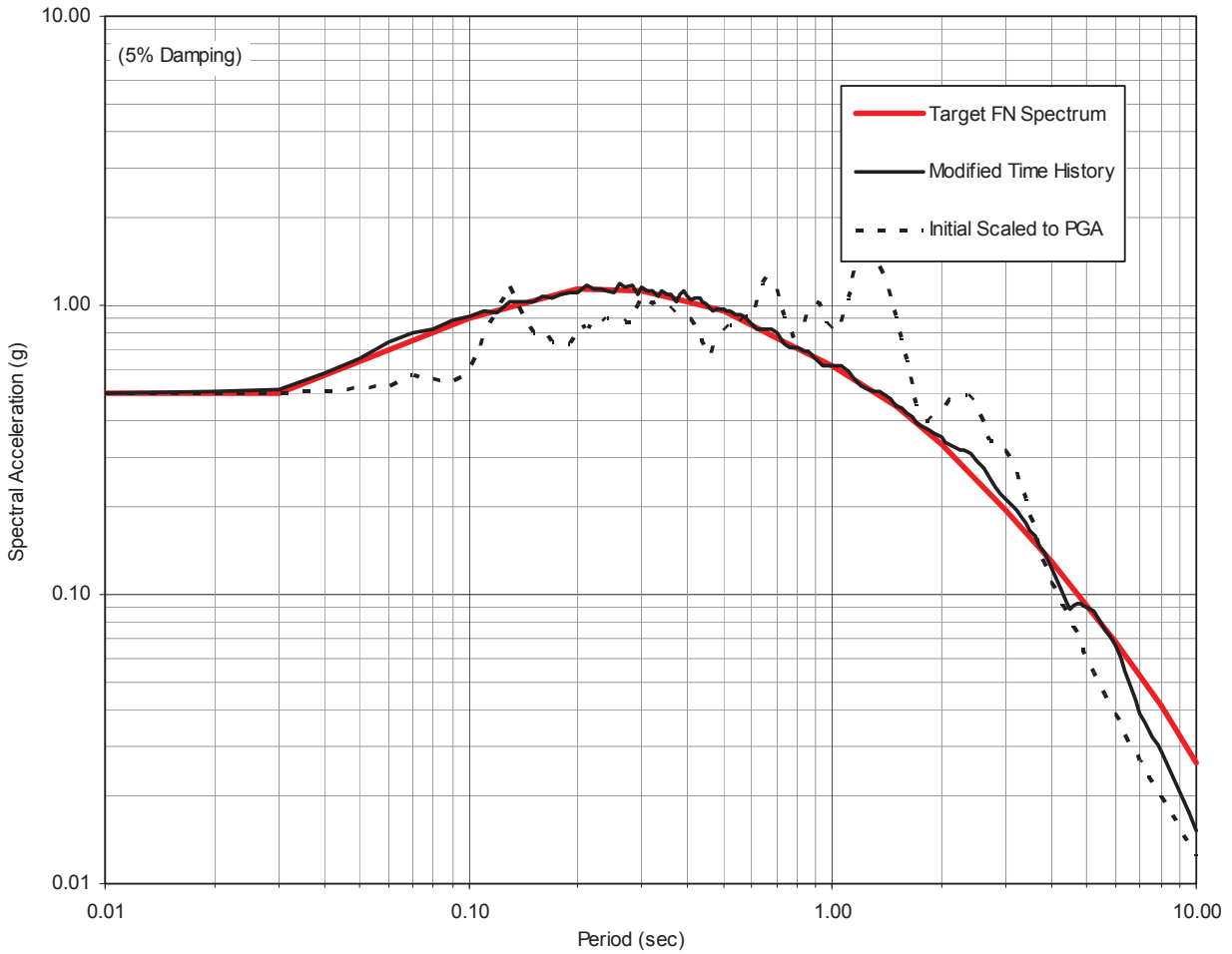
**Figure D-7. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 7  
(c) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FN Component**



**Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(d) Initial Time History for FP Component**



**Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(e) Modified Time History for FP Component**



**Figure D-7. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 7  
(f) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FP Component**

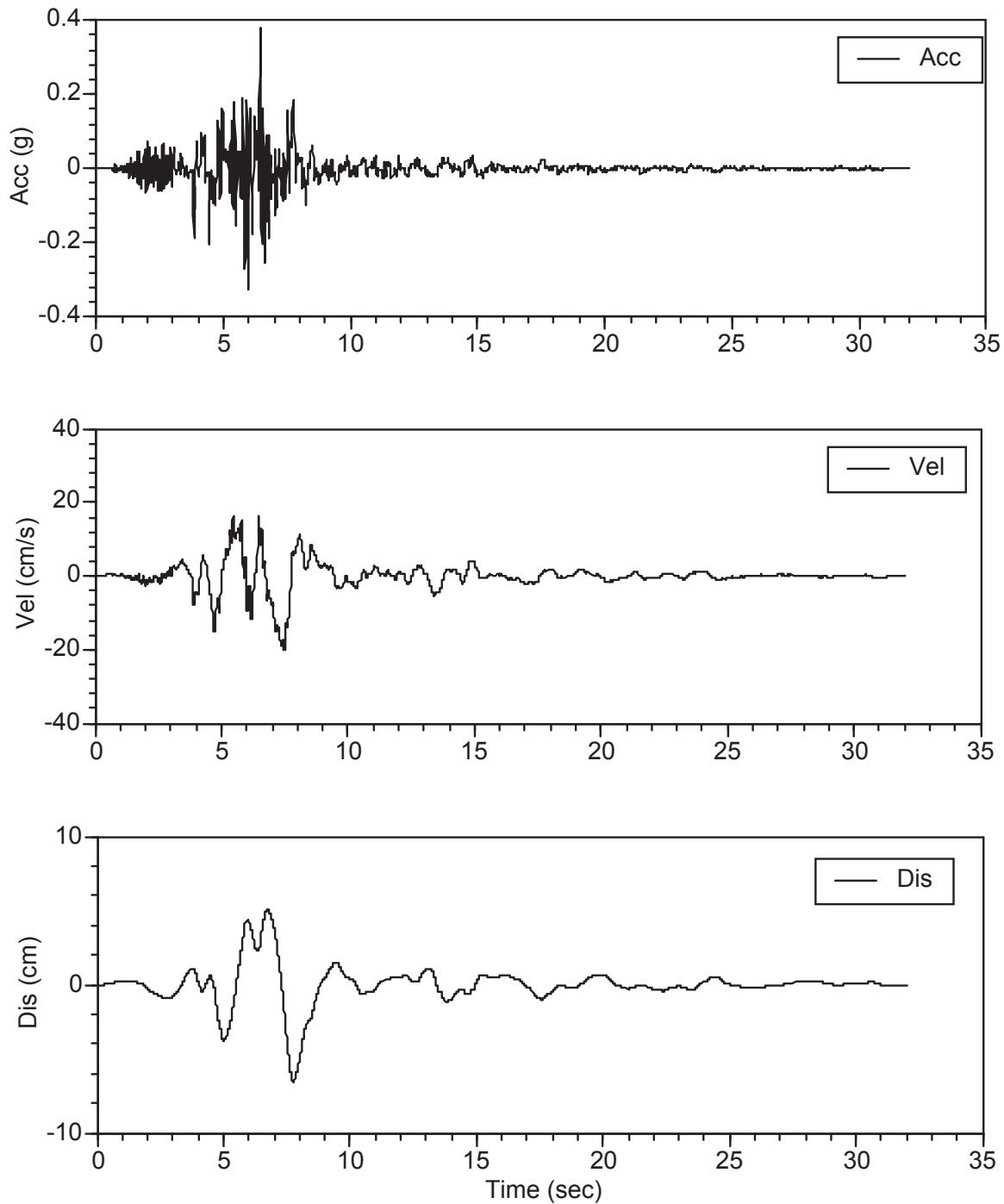
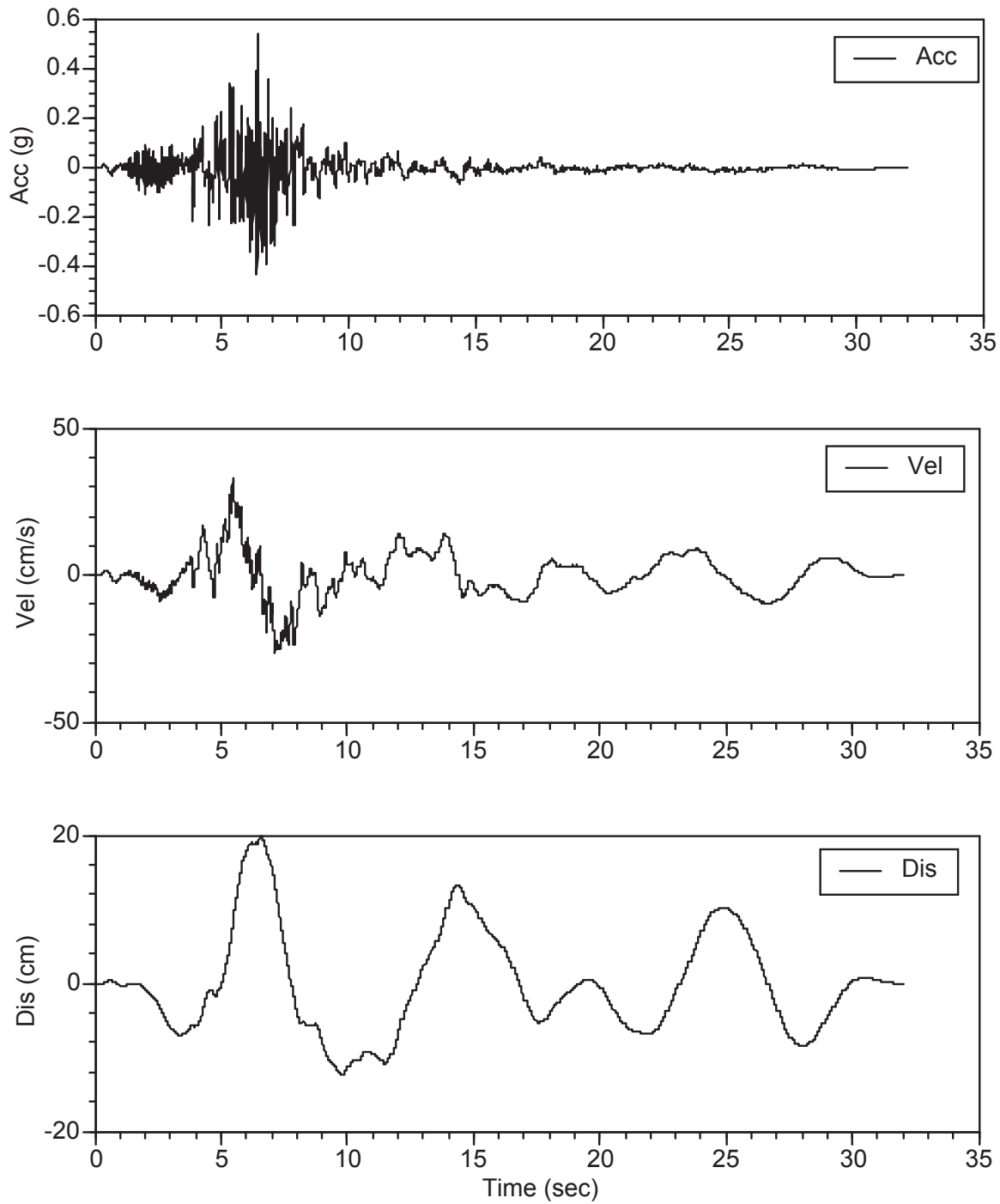
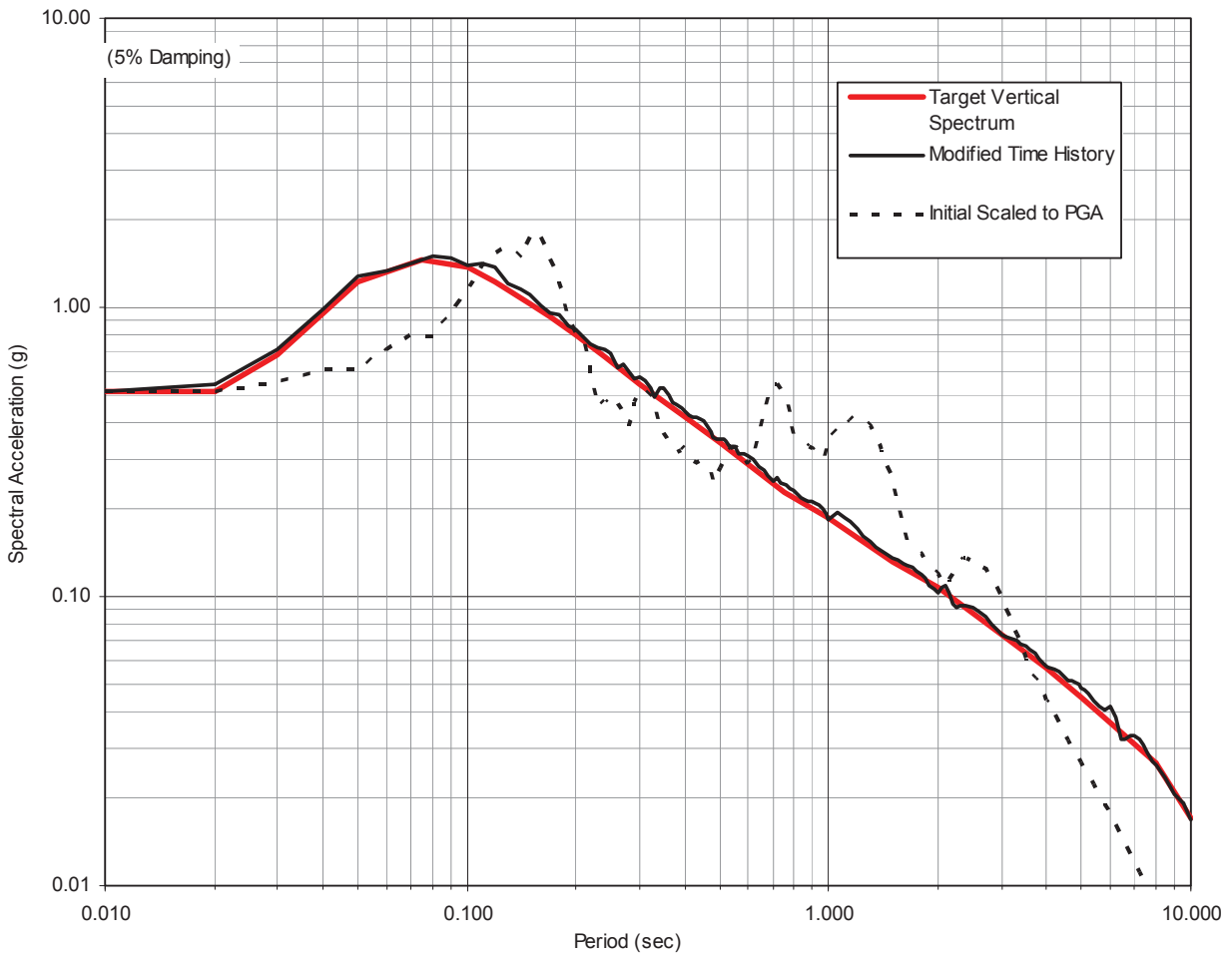


Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(g) Initial Time History for FV Component





**Figure D-7. Firm-Ground Time Histories Compatible to CLE Firm-Ground Spectra, Set 7  
(h) Modified Time History for FV Component**



**Figure D-7. Firm-Ground Motions Compatible to CLE Firm-Ground Spectra, Set 7  
(i) Comparison of Target Spectrum with Spectra of Scaled and Modified Time Histories, FV Component**

## D.2 FIRM-GROUND TIME HISTORIES COMPATIBLE TO OLE FIRM-GROUND SPECTRA

The seven (7) sets of 3-component startup time histories for an Operating-Level Earthquake are listed in Table D-2. These time histories were modified to match the target design spectrum adjusted for the site-specific soil conditions. The seven sets of time histories were chosen based on the 72-year deaggregation hazard solutions which show that the hazards at the 72-year return period could be associated with many possible events, including Magnitude 6.5-7.0 earthquakes from nearby faults (0-10 km) including the Palos Verdes fault, but also could be associated with other larger magnitude (say M7.5) from more distance faults (30-100 km). Therefore, the seven startup motions reflect earthquakes ranging from Magnitude 6.5-7.0, and from distances extending from near-fault to moderate distance events. To obtain a firm-ground target spectrum compatible with the design spectrum at the ground surface, the recommended horizontal design spectrum (Figure 5-7) was divided by the transfer function between firm-ground and ground surface motions. The transfer function is the ratio of the theoretical site-effect adjusted spectrum and the horizontal firm-ground UHS (Figures 3-11 and 3-13) and (Figure 4-3).

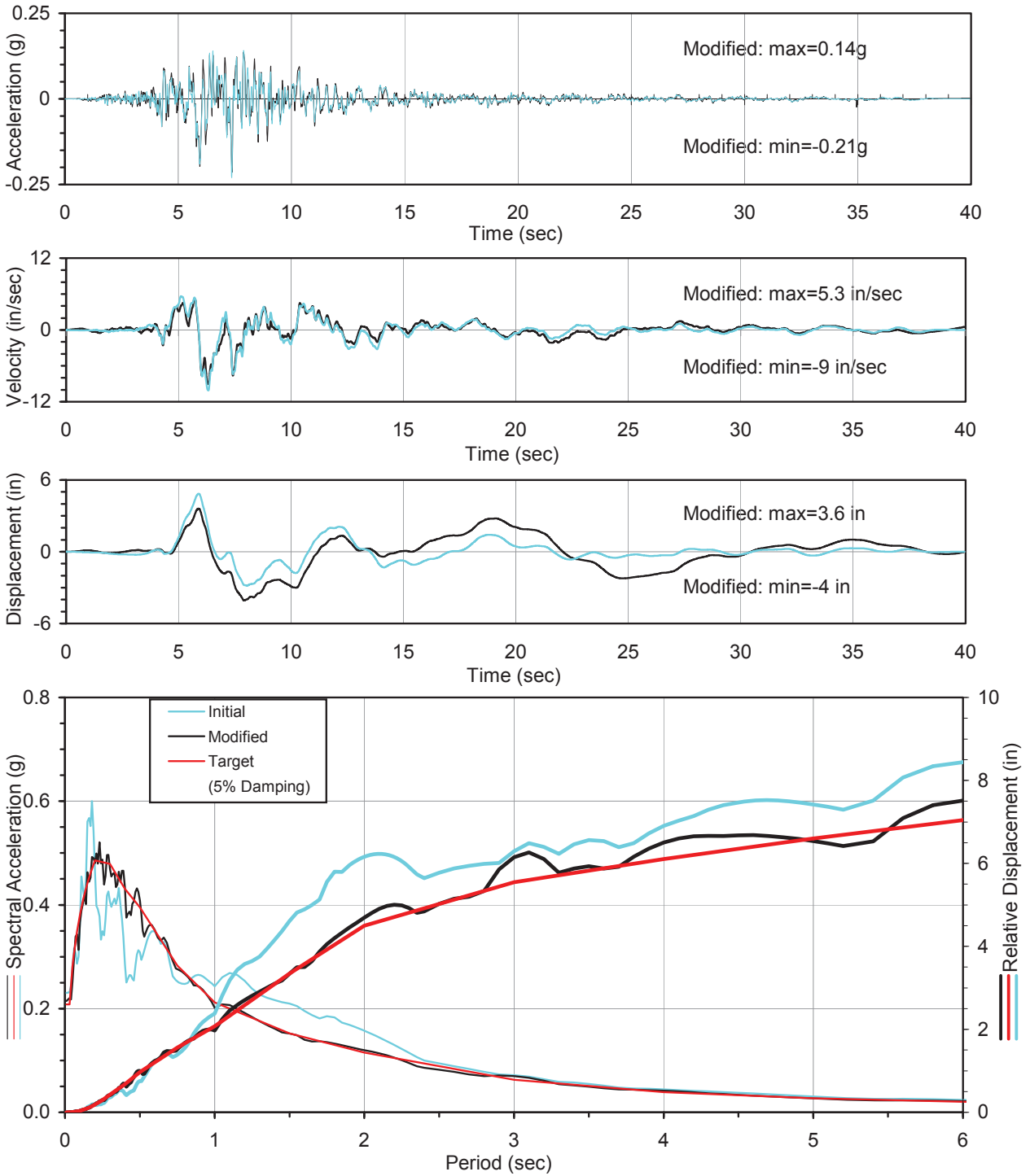
Each motion set has three (FN, FP and FV) Components, resulting in a total of 21 time histories. For each time history, the following is plotted:

- Initial acceleration, velocity and displacement time histories scaled to PGA,
- Spectrum-matched acceleration, velocity and displacement time histories, and
- Comparison of the corresponding spectra of spectrum-matched time histories with the target firm-ground OLE spectrum that is compatible to the design spectrum.

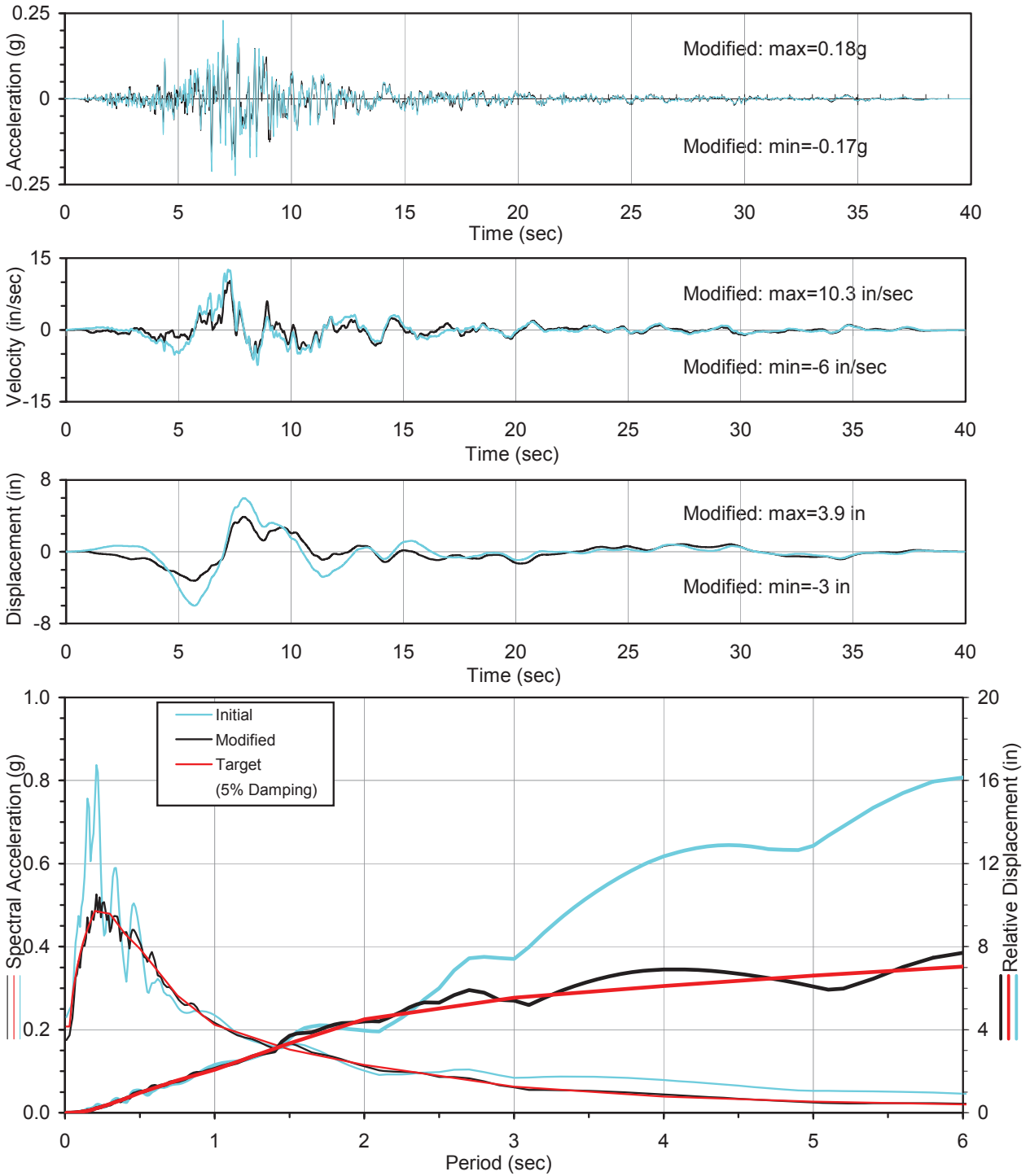
These plots are shown in Figure D-8 through Figure D-14 for the OLE time history set number 1 through set number 7, respectively.

**Table D-2. Ground Motion Sets Selected for OLE Spectral Matching**

Set	Earthquake	Mag.	Station	Distance (km)
1	1989 Loma Prieta	6.9	Saratoga – Aloha Ave.	13.0
2	1987 Superstition Hill	6.3	Wildlife Liquefaction Array	24.7
3	1987 Whittier	6.0	Northridge-Saticoy St.	39.8
4	1979 Imperial Valley	6.5	EC CO Center FF	7.6
5	1979 Imperial Valley	6.5	Calexico Fire Station	10.6
6	1992 Erzikan	6.9	Erzikan	2.0
7	1994 Northridge	6.7	Century City, LACC	25.7



**Figure D-8. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 1 (a) FN Component**



**Figure D-8. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 1 (b) FP Component**

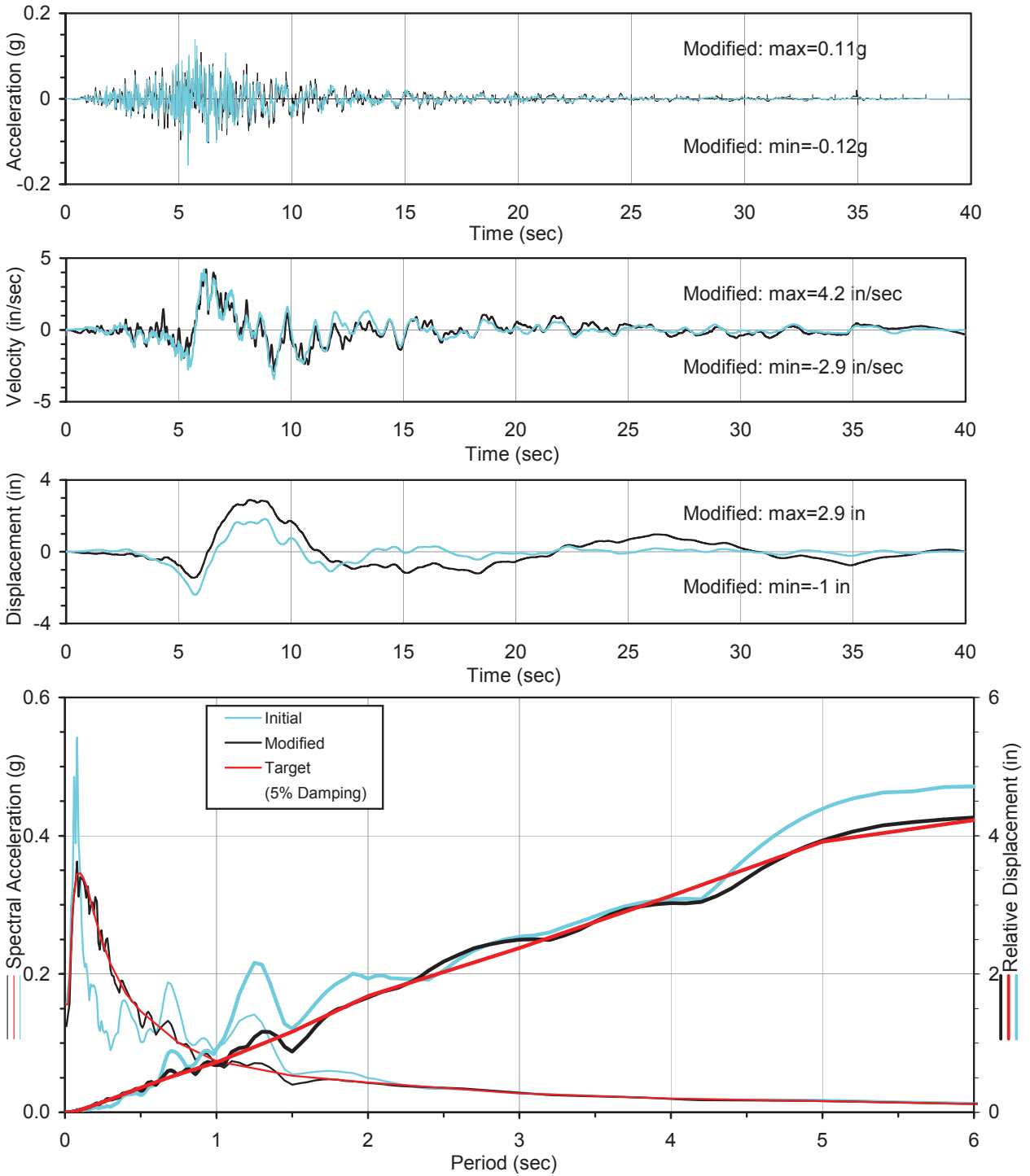


Figure D-8. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 1 (c) FV Component

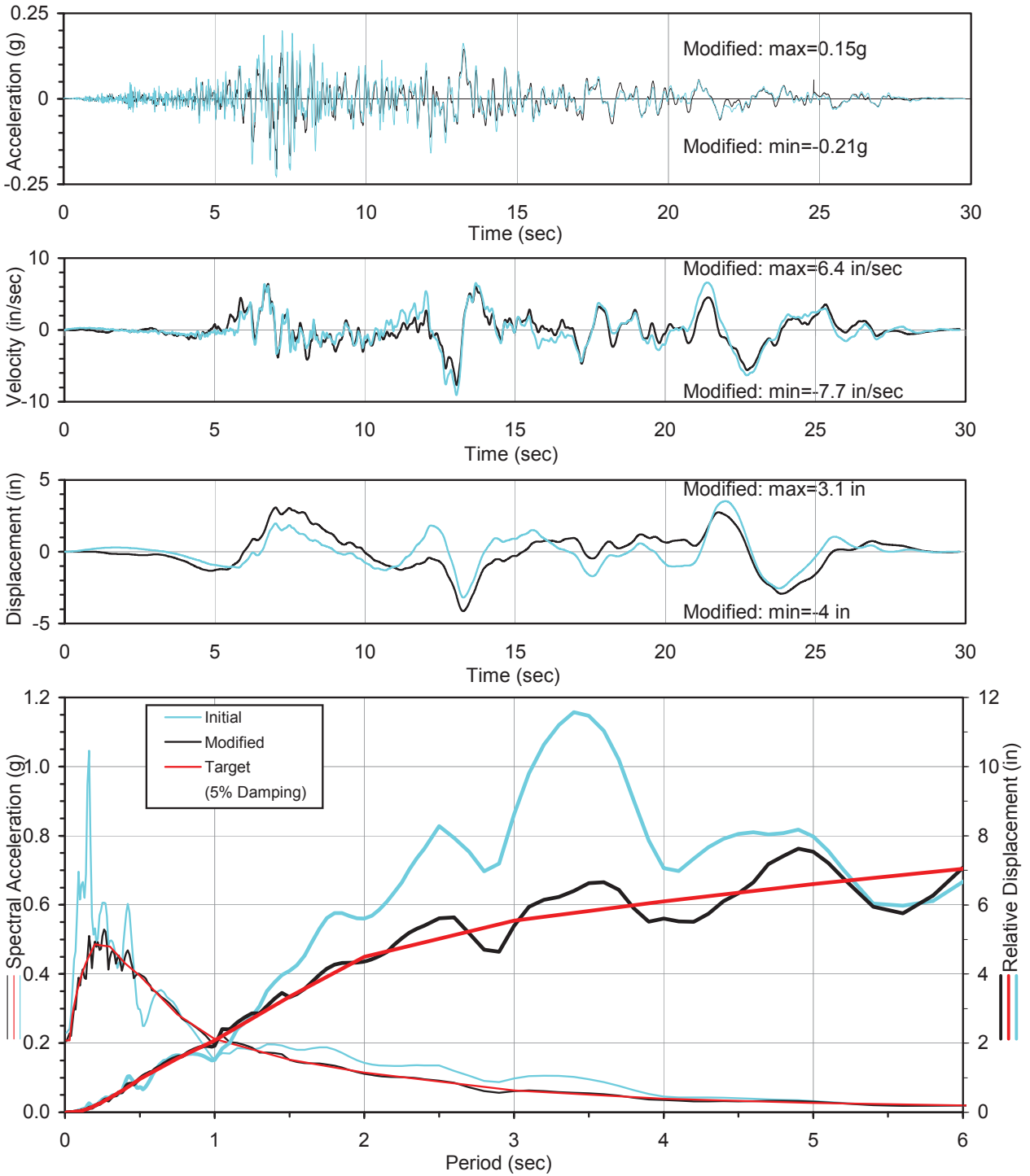
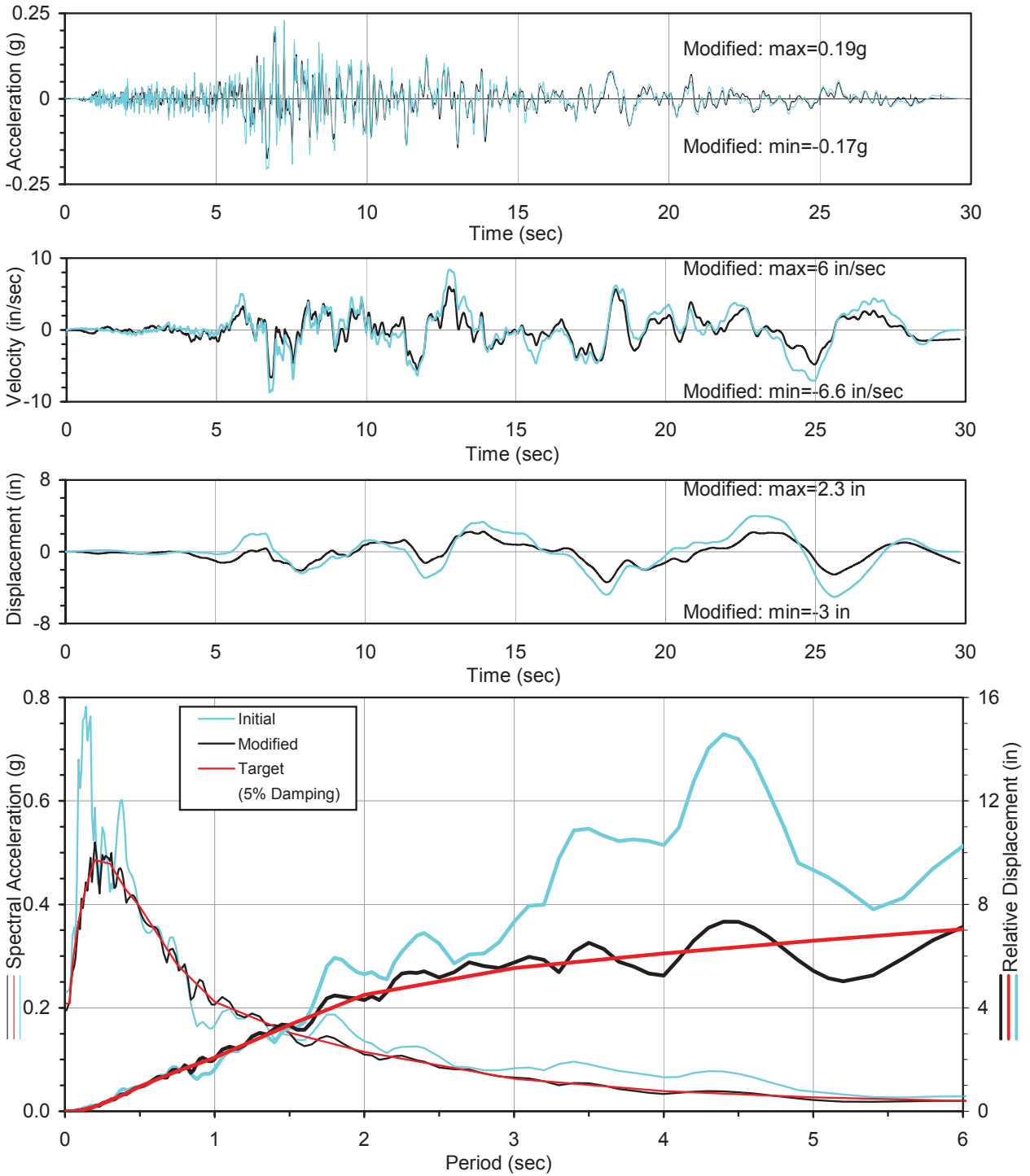
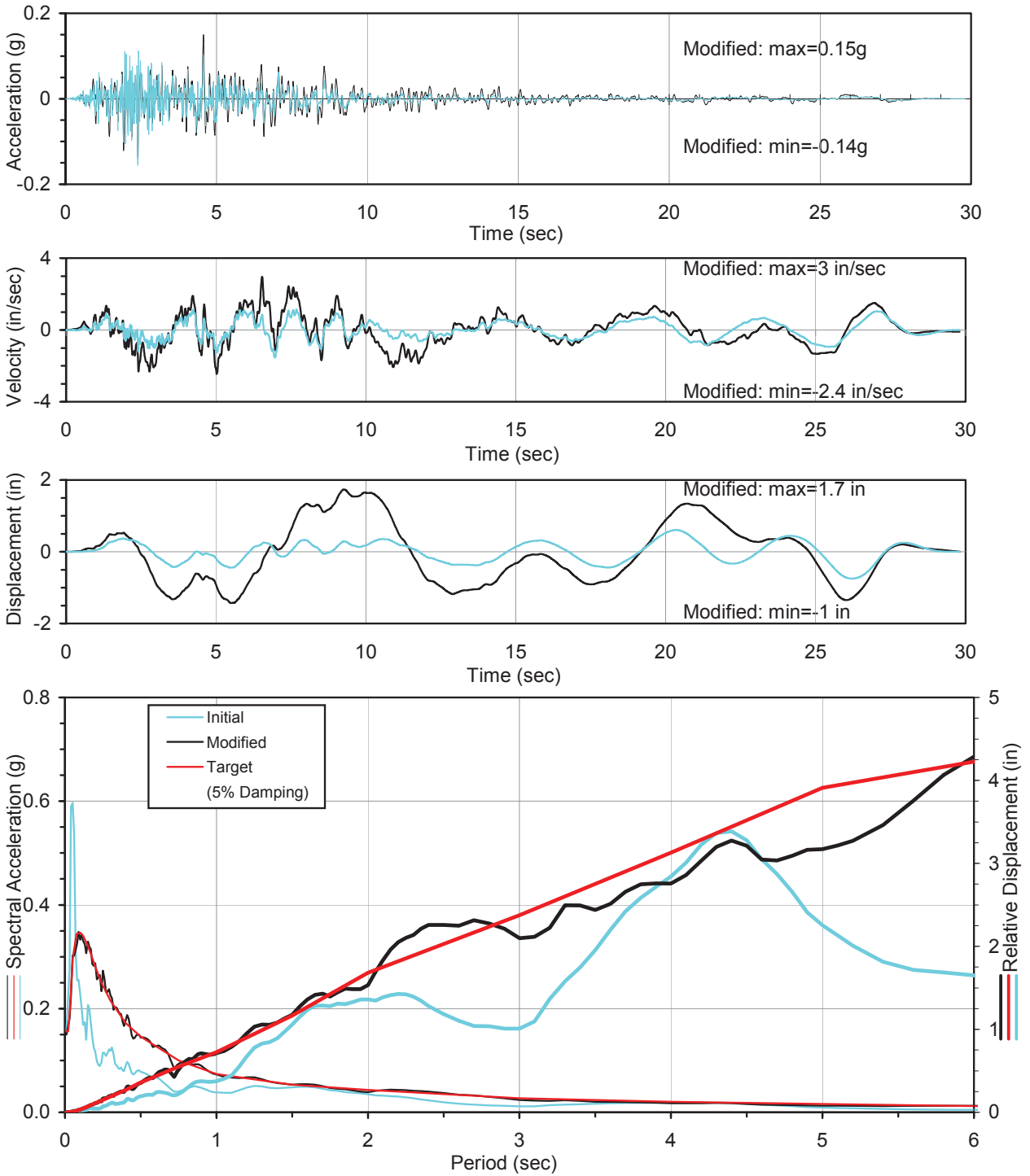


Figure D-9. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 2  
(a) FN Component



**Figure D-9. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 2 (b) FP Component**





**Figure D-9. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 2 (c) FV Component**

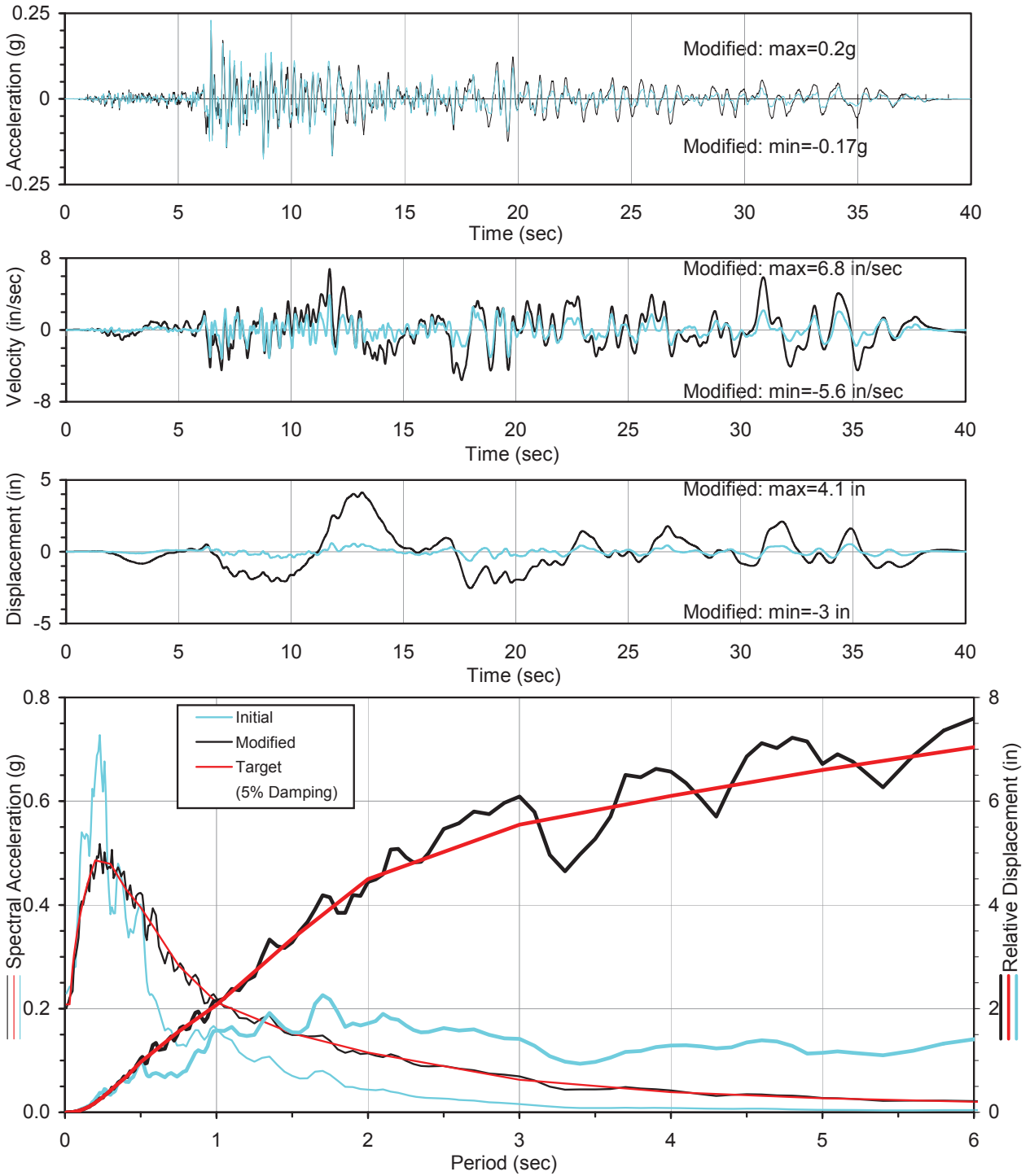


Figure D-10. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 3  
 (a) FN Component

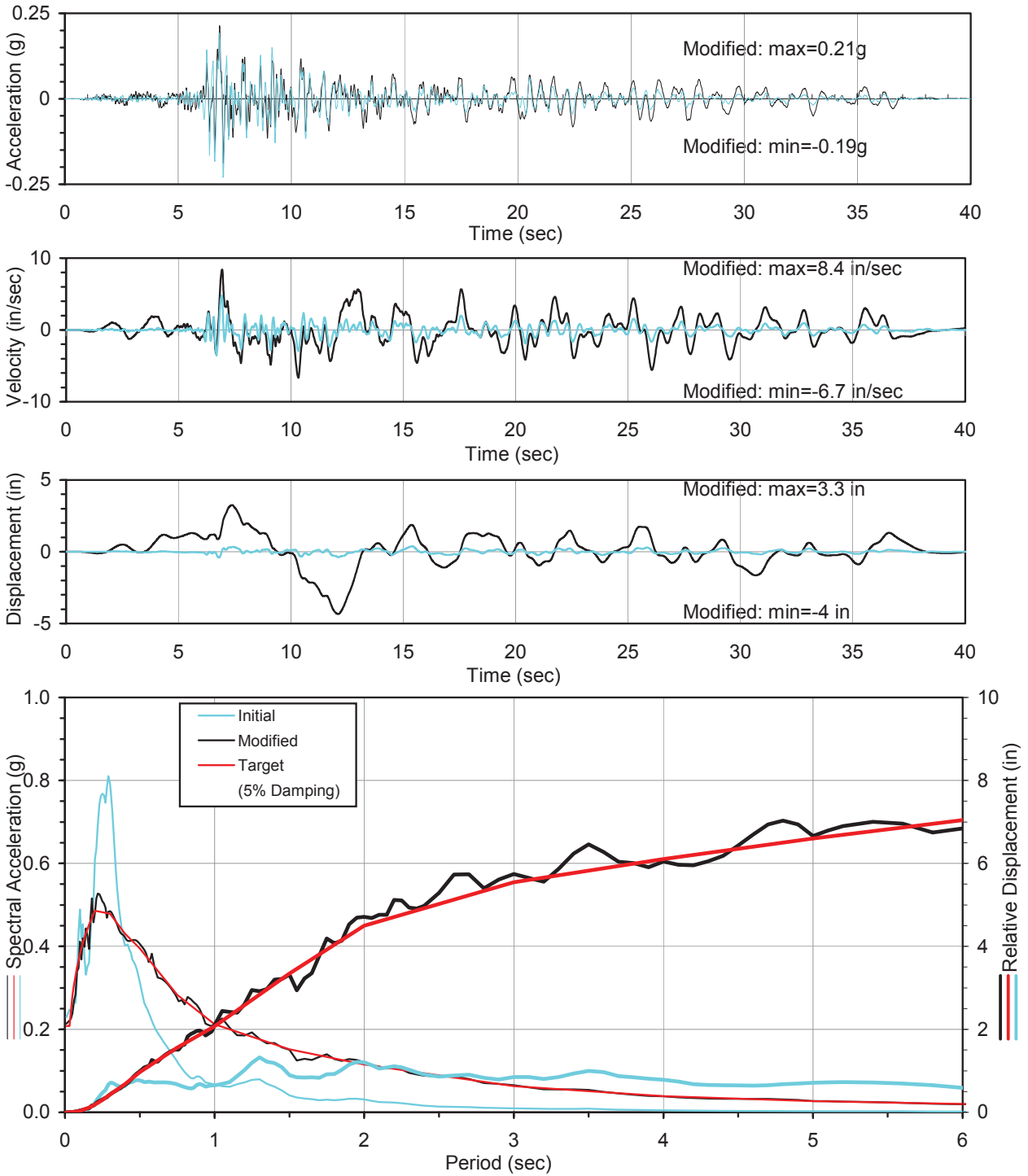


Figure D-10. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 3  
(b) FP Component

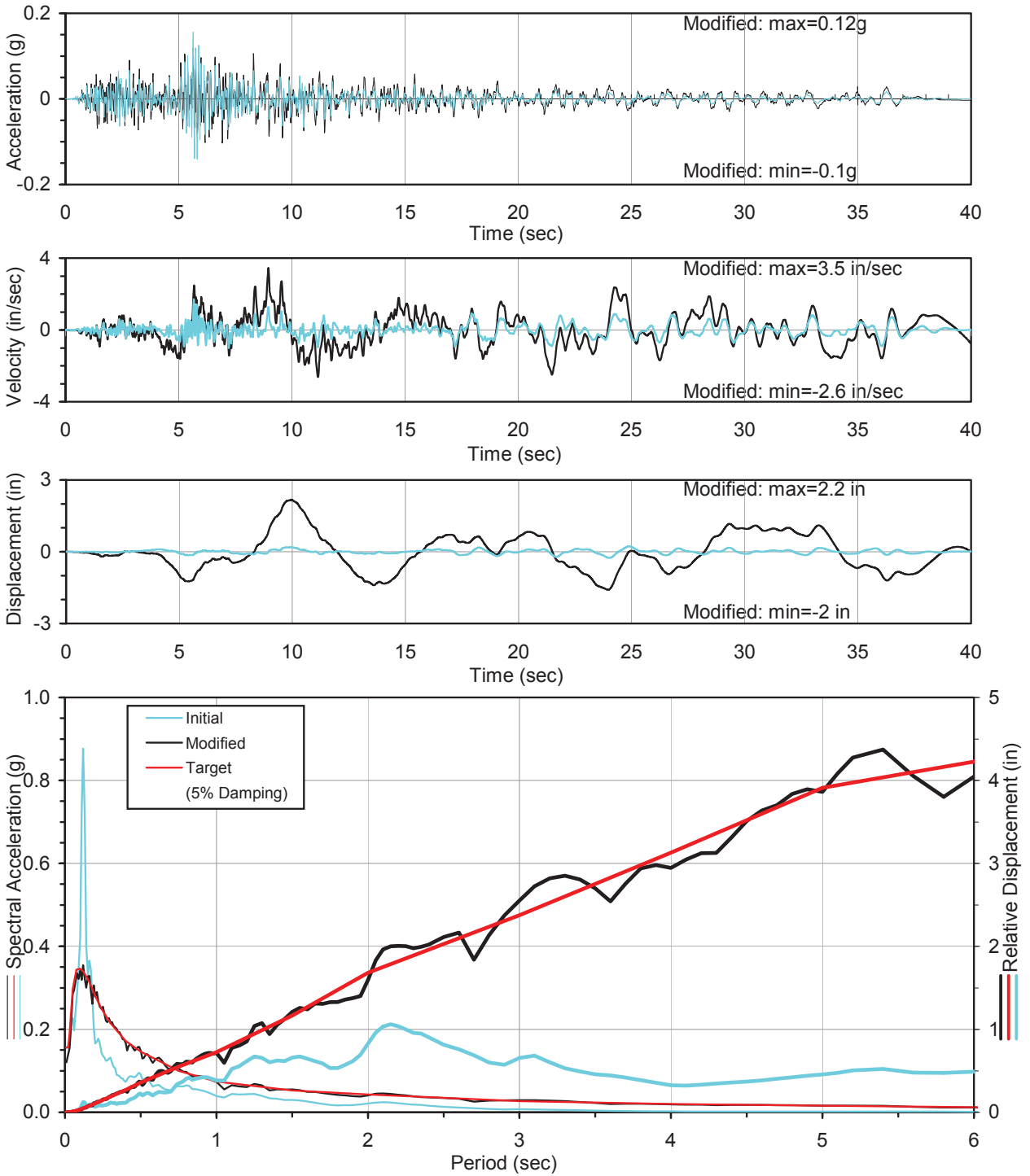


Figure D-10. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 3 (c) FV Component

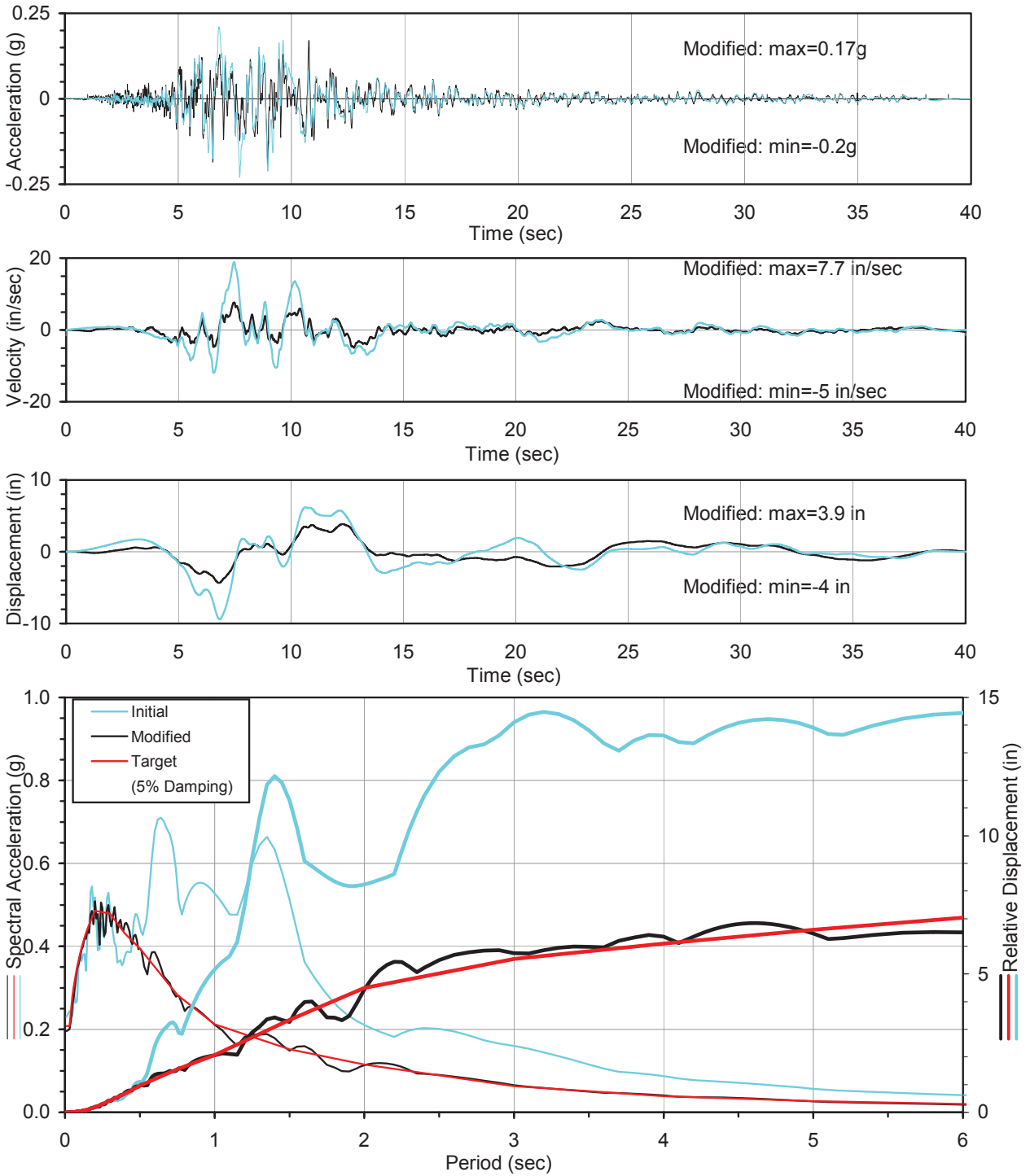
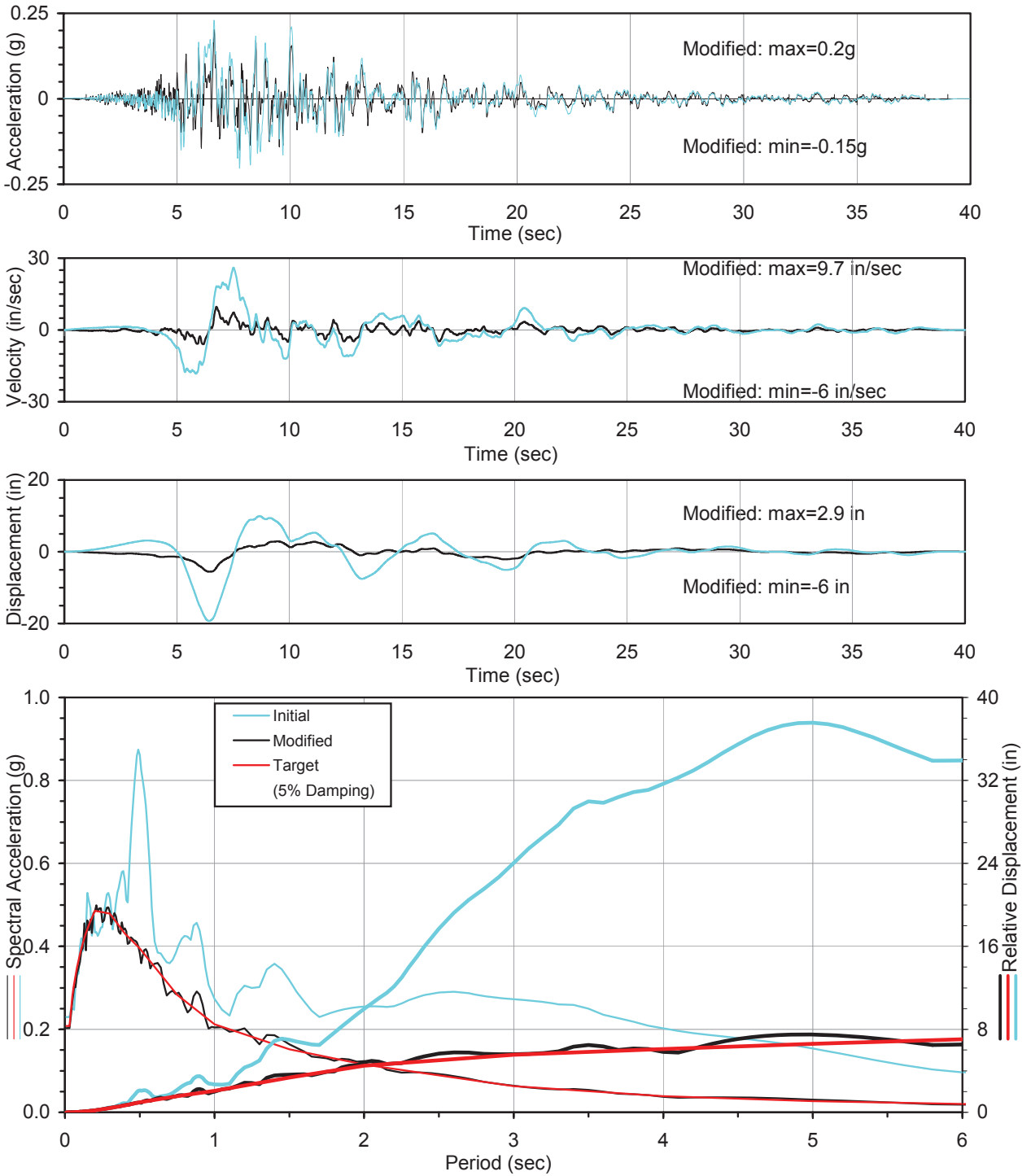
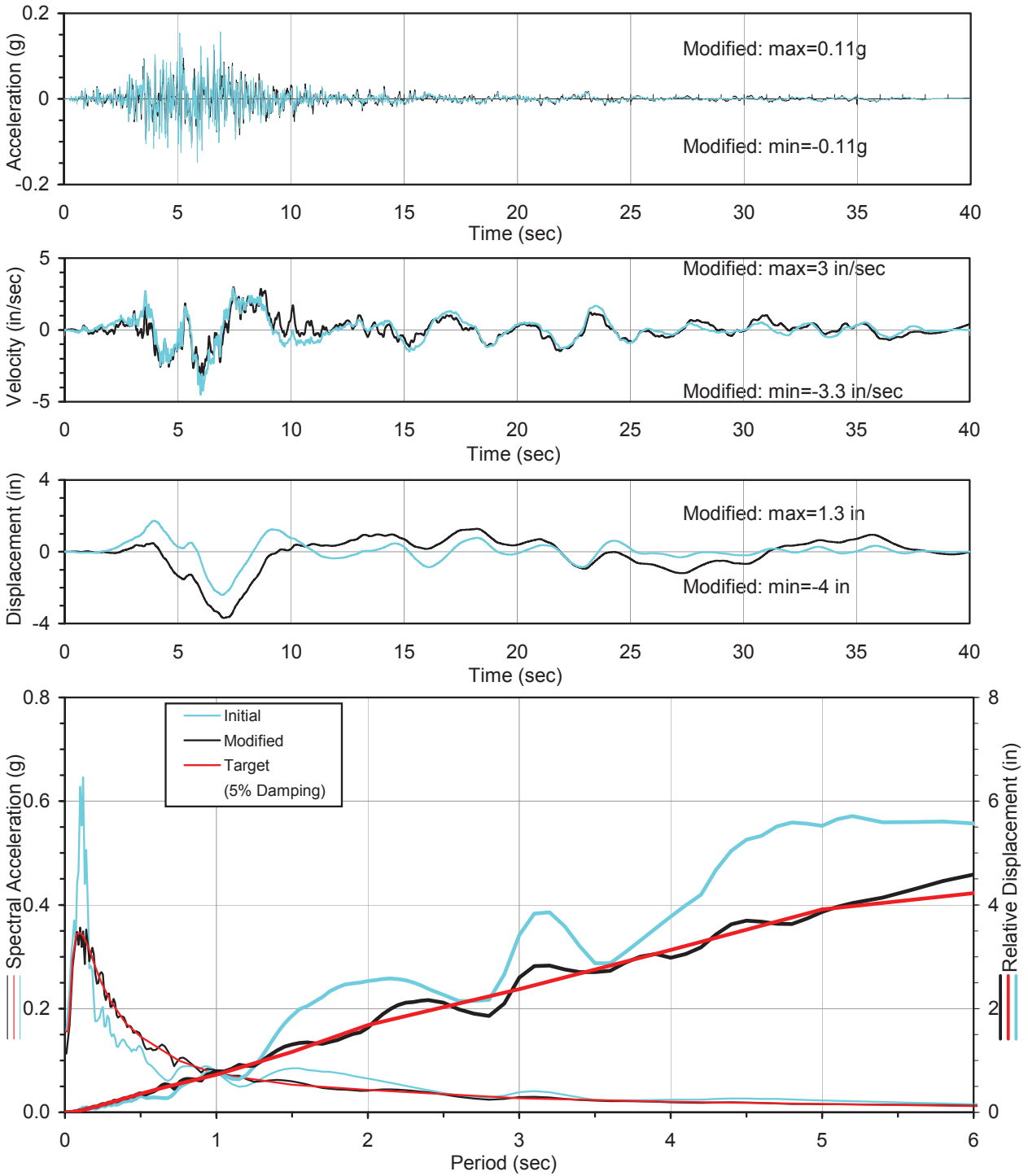


Figure D-11. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 4  
(a) FN Component



**Figure D-11. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 4 (b) FP Component**



**Figure D-11. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 4 (c) FV Component**

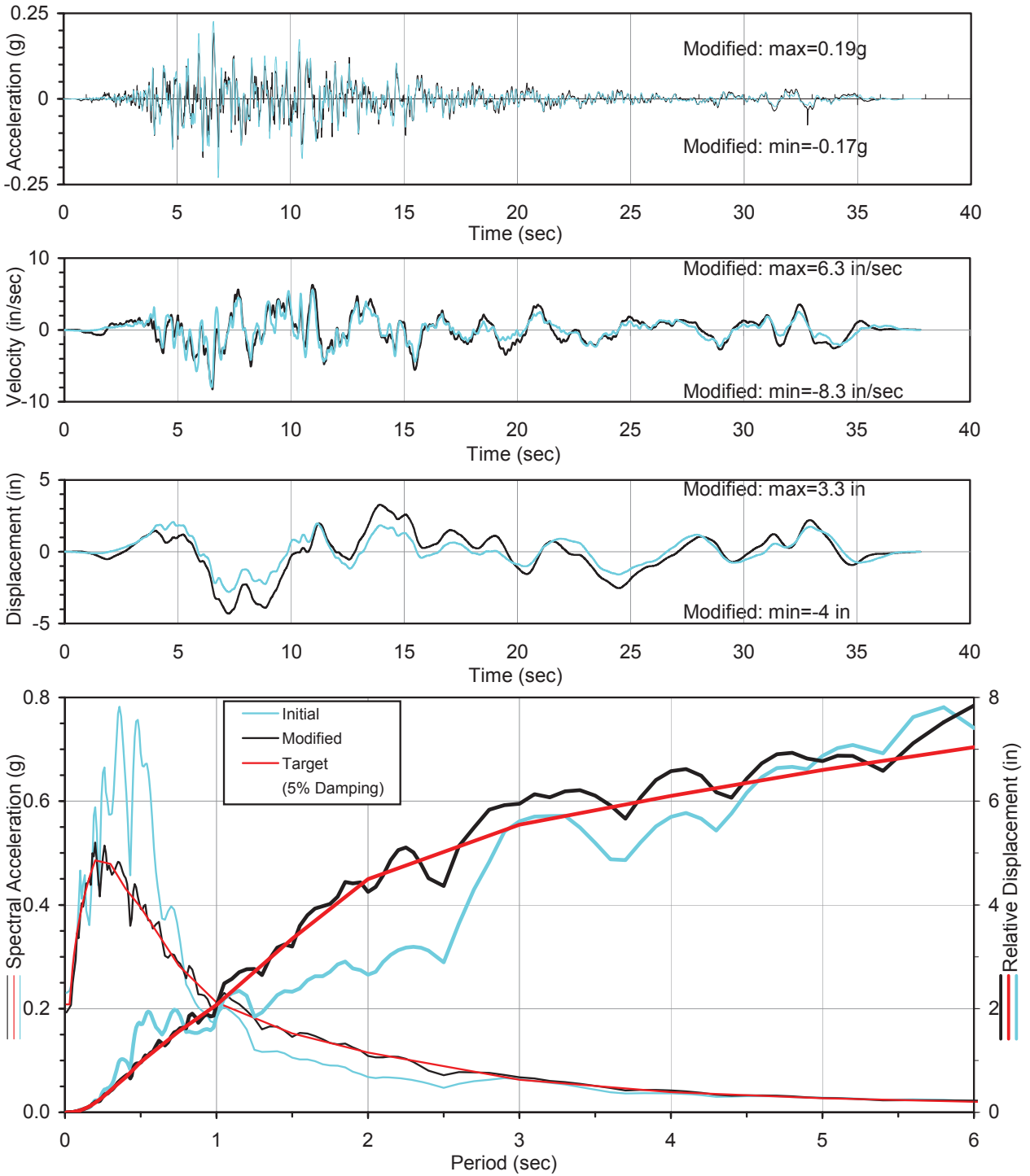
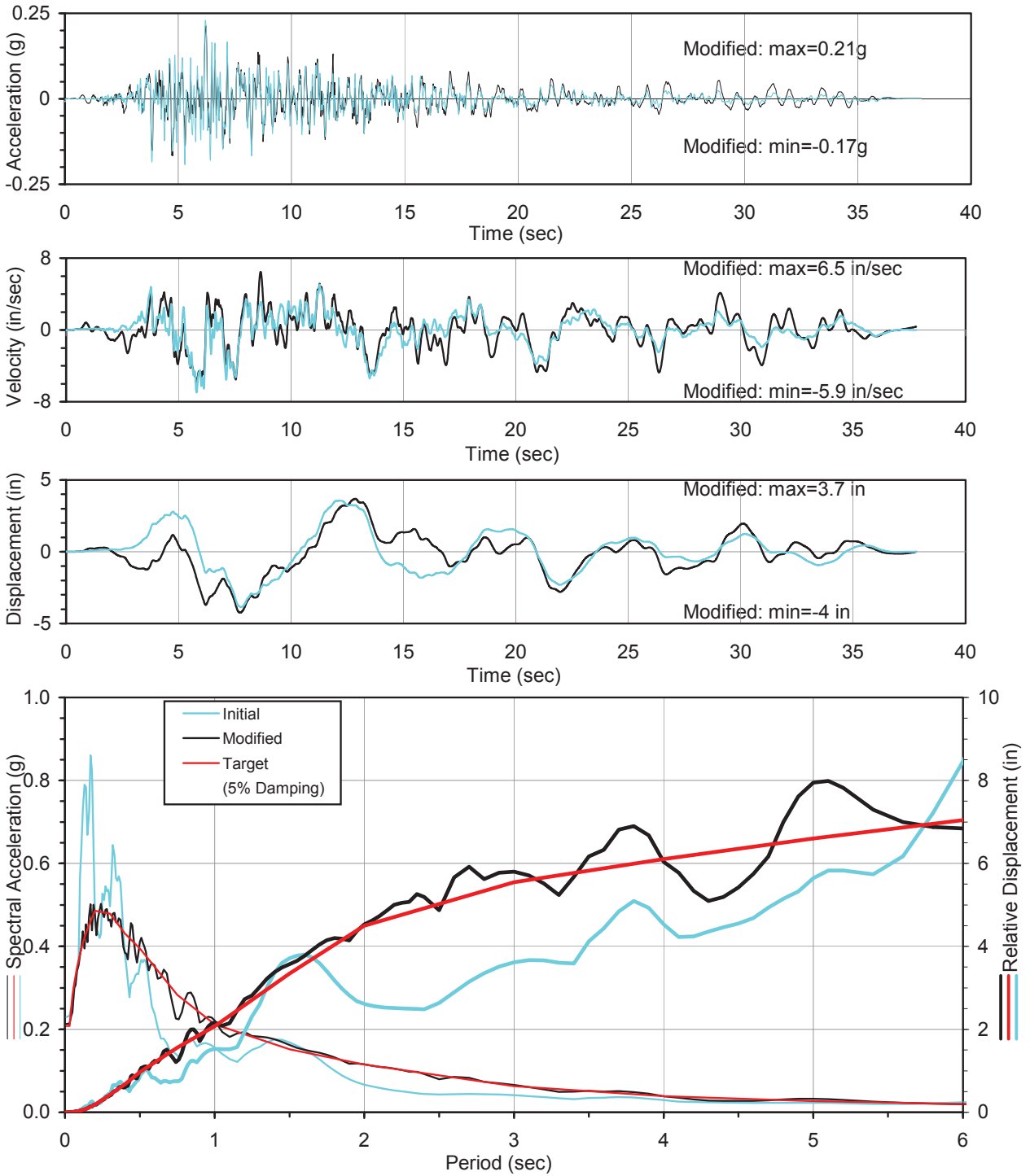


Figure D-12. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 5  
(a) FN Component





**Figure D-12. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 5 (b) FP Component**

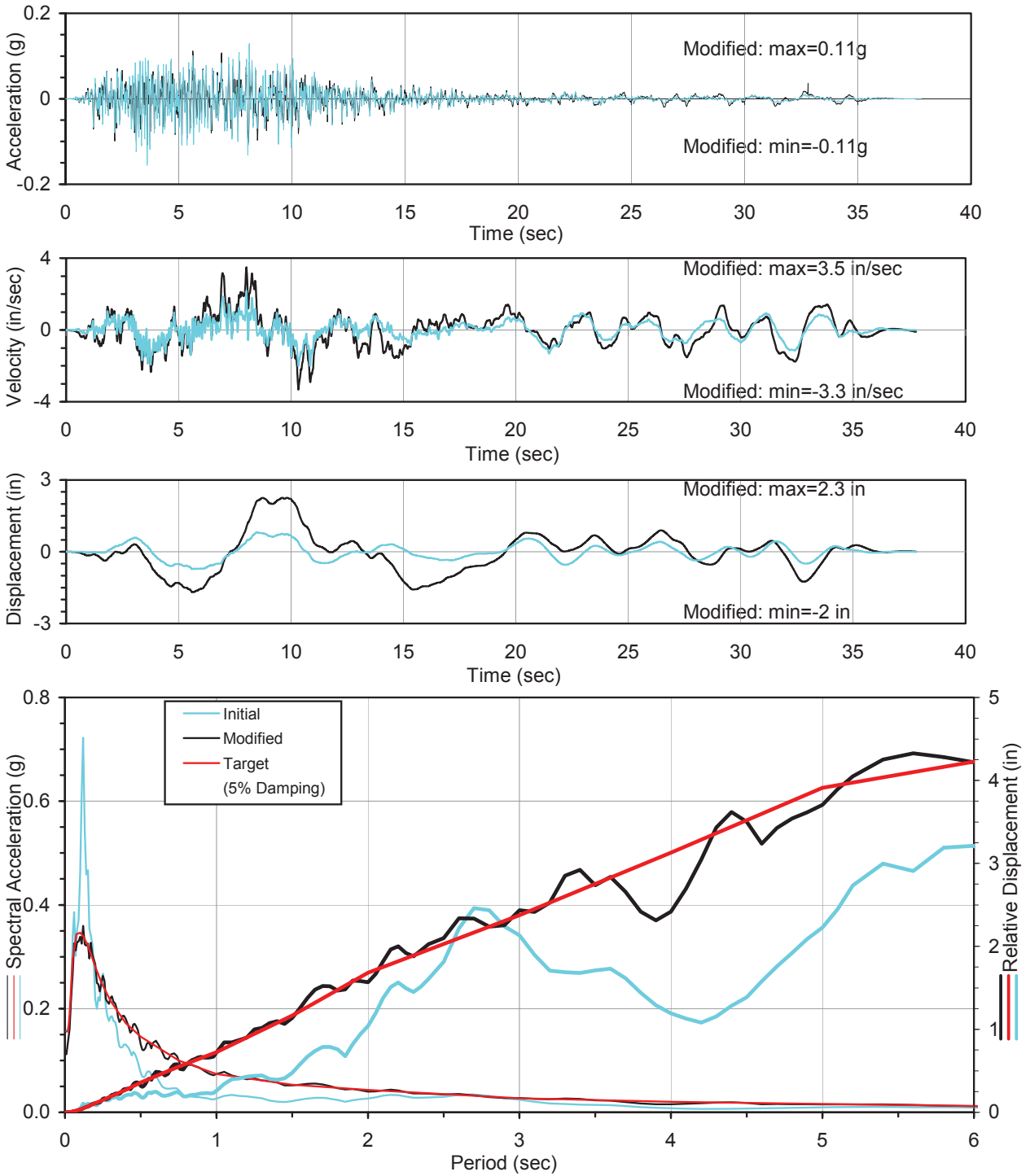
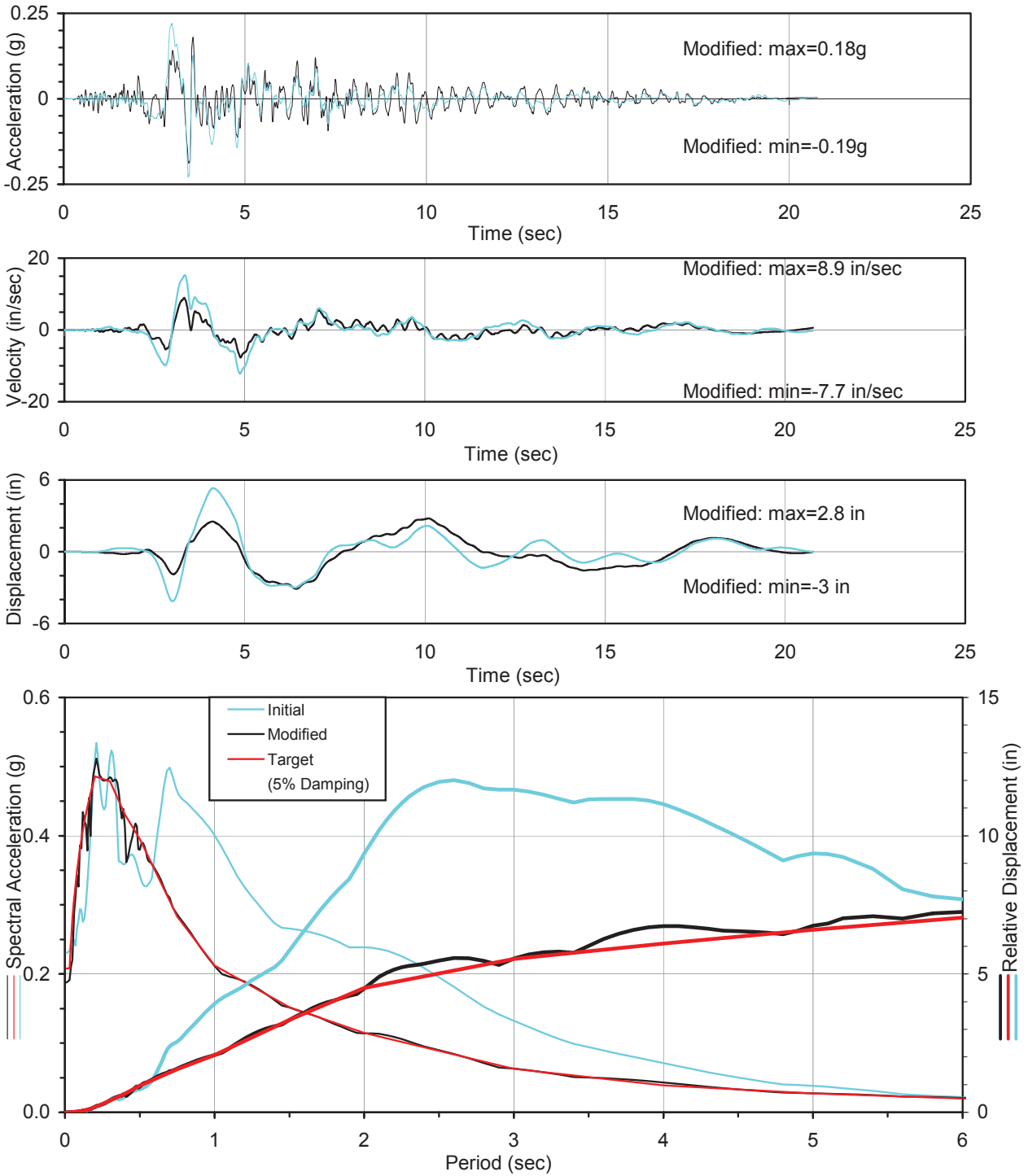
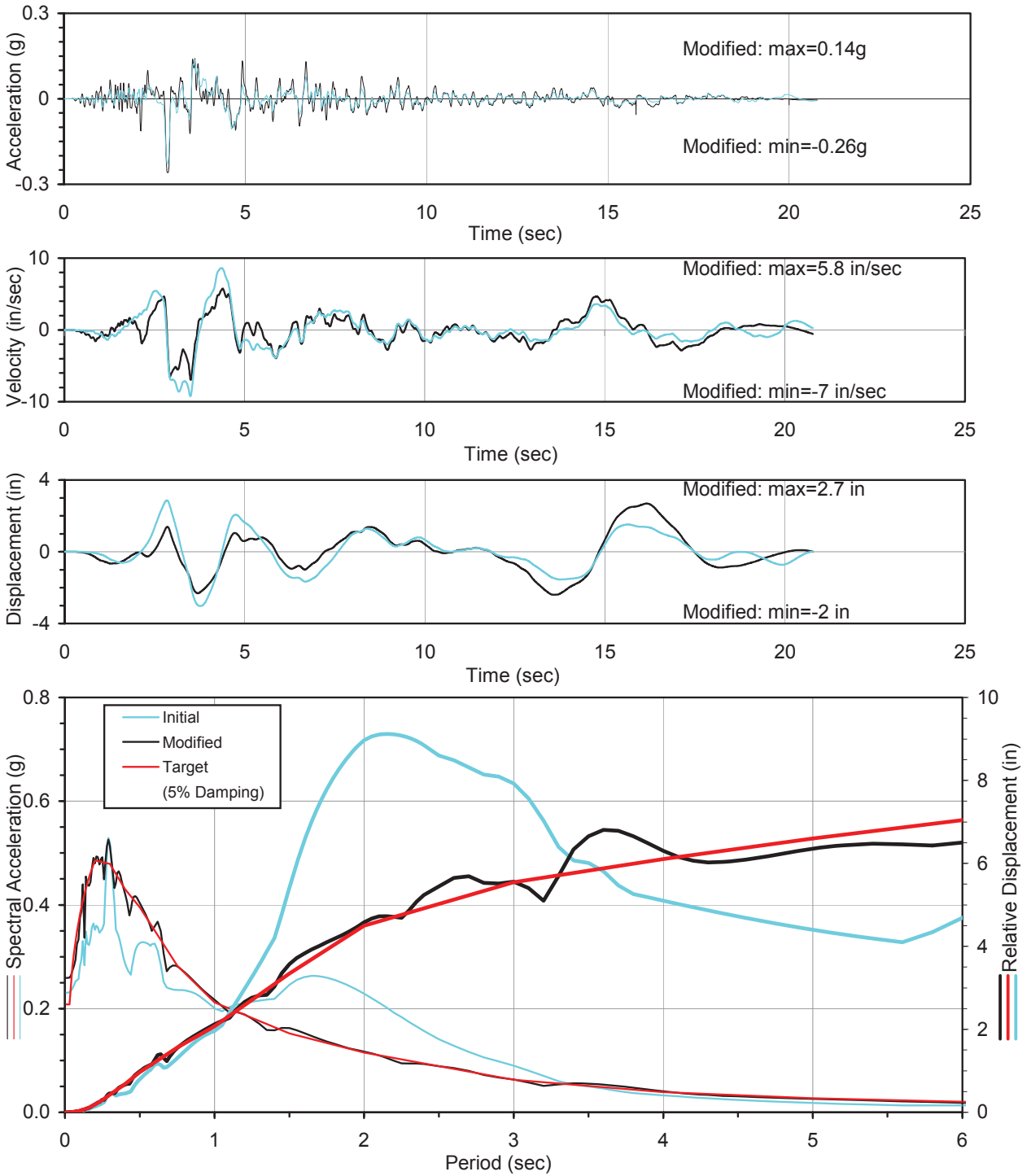


Figure D-12. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 5  
(c) FV Component



**Figure D-13. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 6 (a) FN Component**



**Figure D-13. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 6 (b) FP Component**

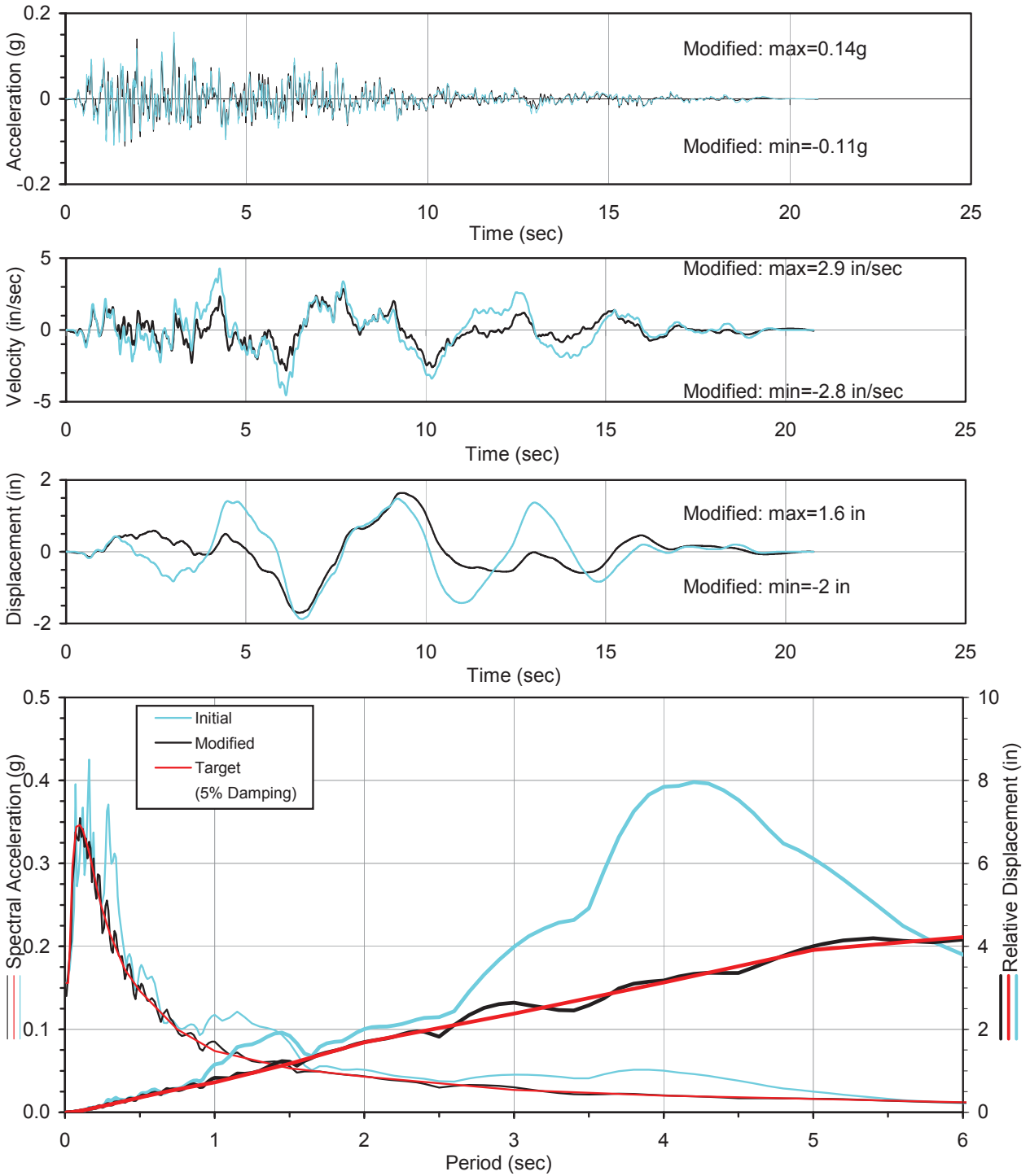


Figure D-13. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 6 (c) FV Component

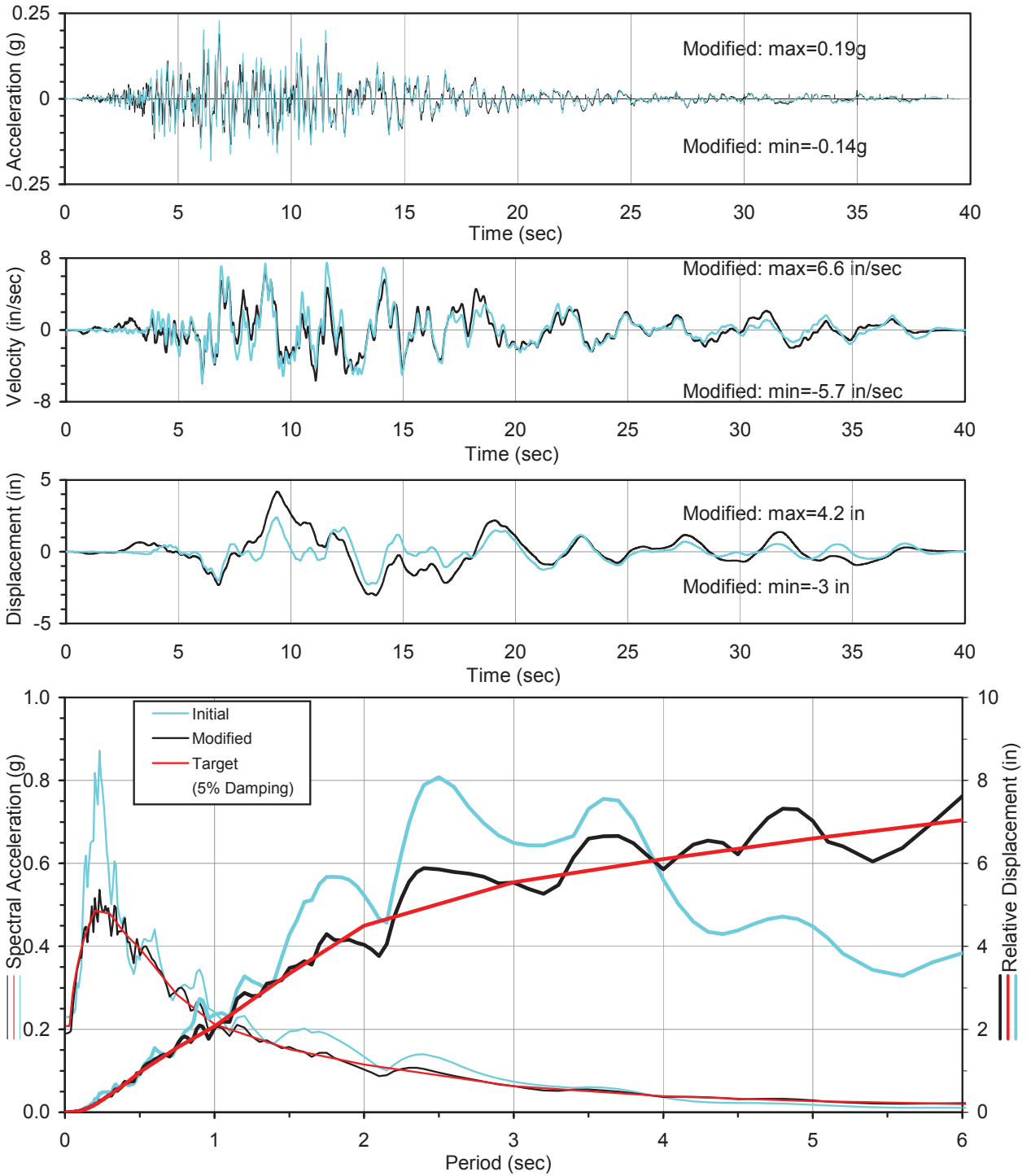


Figure D-14. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 7  
(a) FN Component

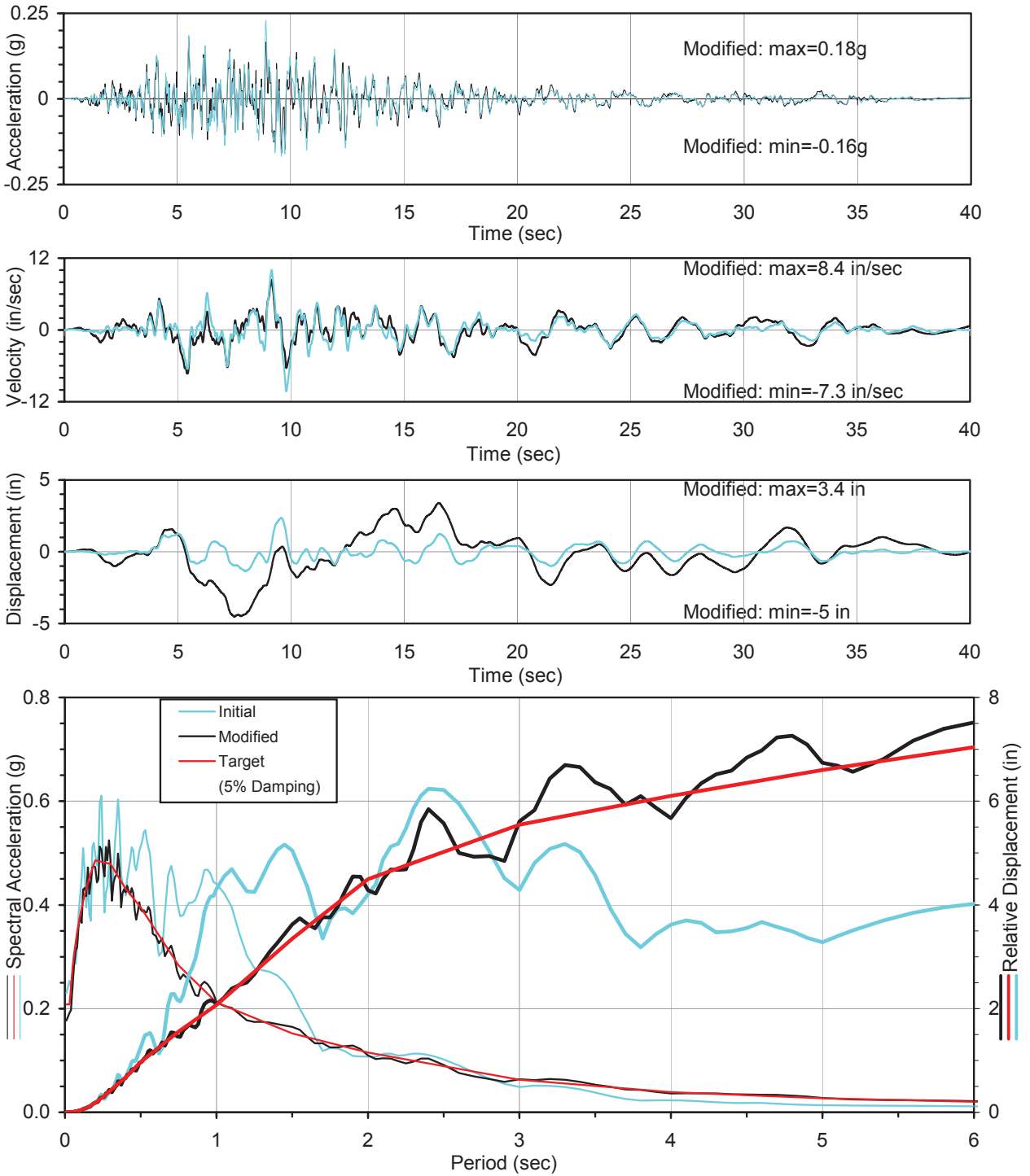
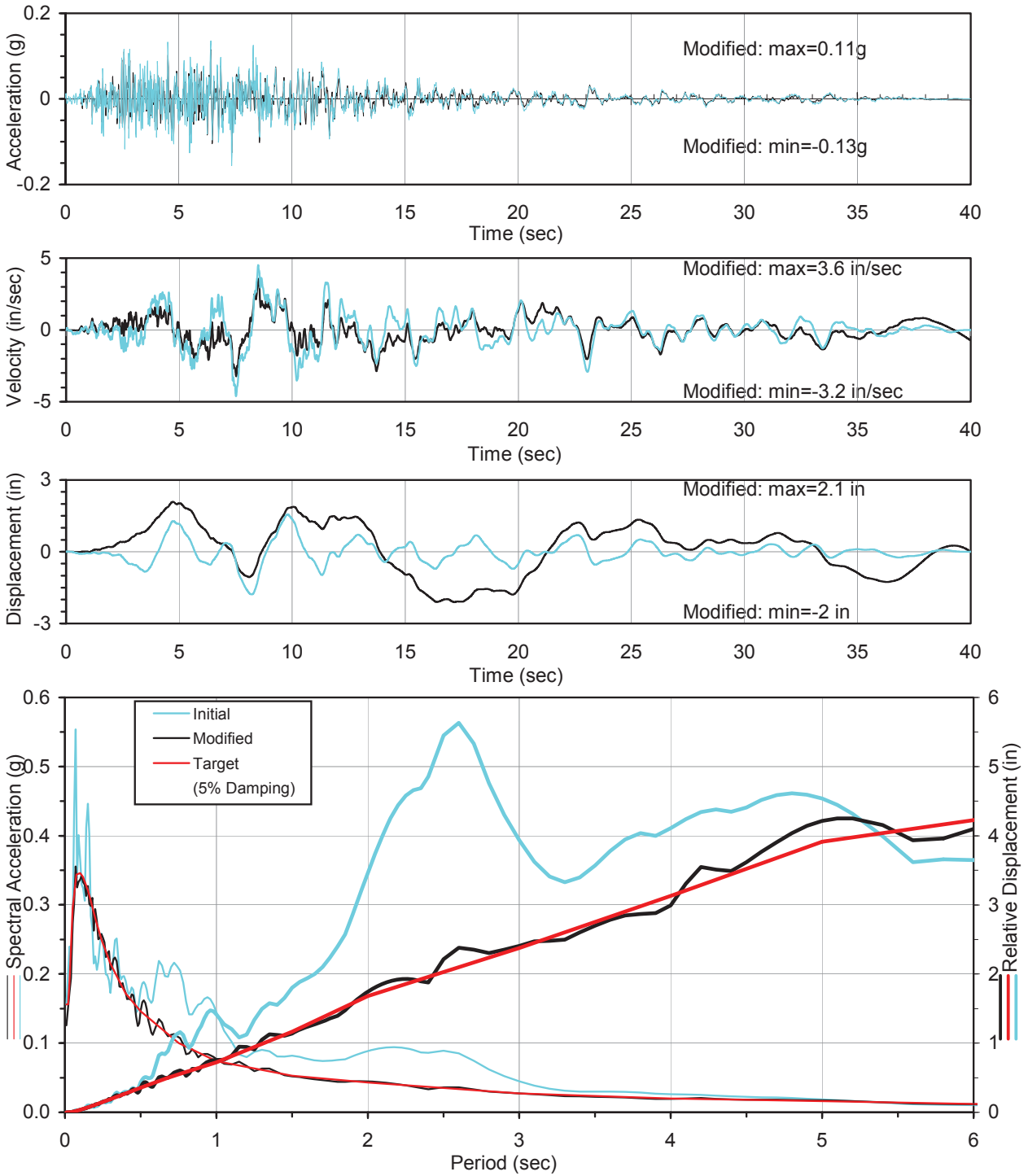


Figure D-14. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 7  
 (b) FP Component



**Figure D-14. Firm-Ground Time Histories Compatible to OLE Firm-Ground Spectra, Set 7 (c) FV Component**



### **D.3 DESIGN TIME HISTORIES COMPATIBLE TO CLE DESIGN SPECTRA**

Seven (7) sets of 3-component time histories were generated using the seven initial firm-ground motions presented in Section D.1 for the Contingency-Level earthquake event. The resulting ground surface motions were modified to match the CLE target design spectra (Figures 5-7 and 5-8).

For each of the 21 time histories, the following is plotted:

- Initial acceleration, velocity and displacement time histories scaled to PGA,
- Modified (spectrum-matched) ground surface acceleration, velocity and displacement time histories, and
- Comparison of the target CLE design spectrum and the spectrum of the modified time histories.

These plots are shown in Figure D-15 through Figure D-21 for the CLE design time history set number 1 through set number 7 (see Table D-1), respectively.

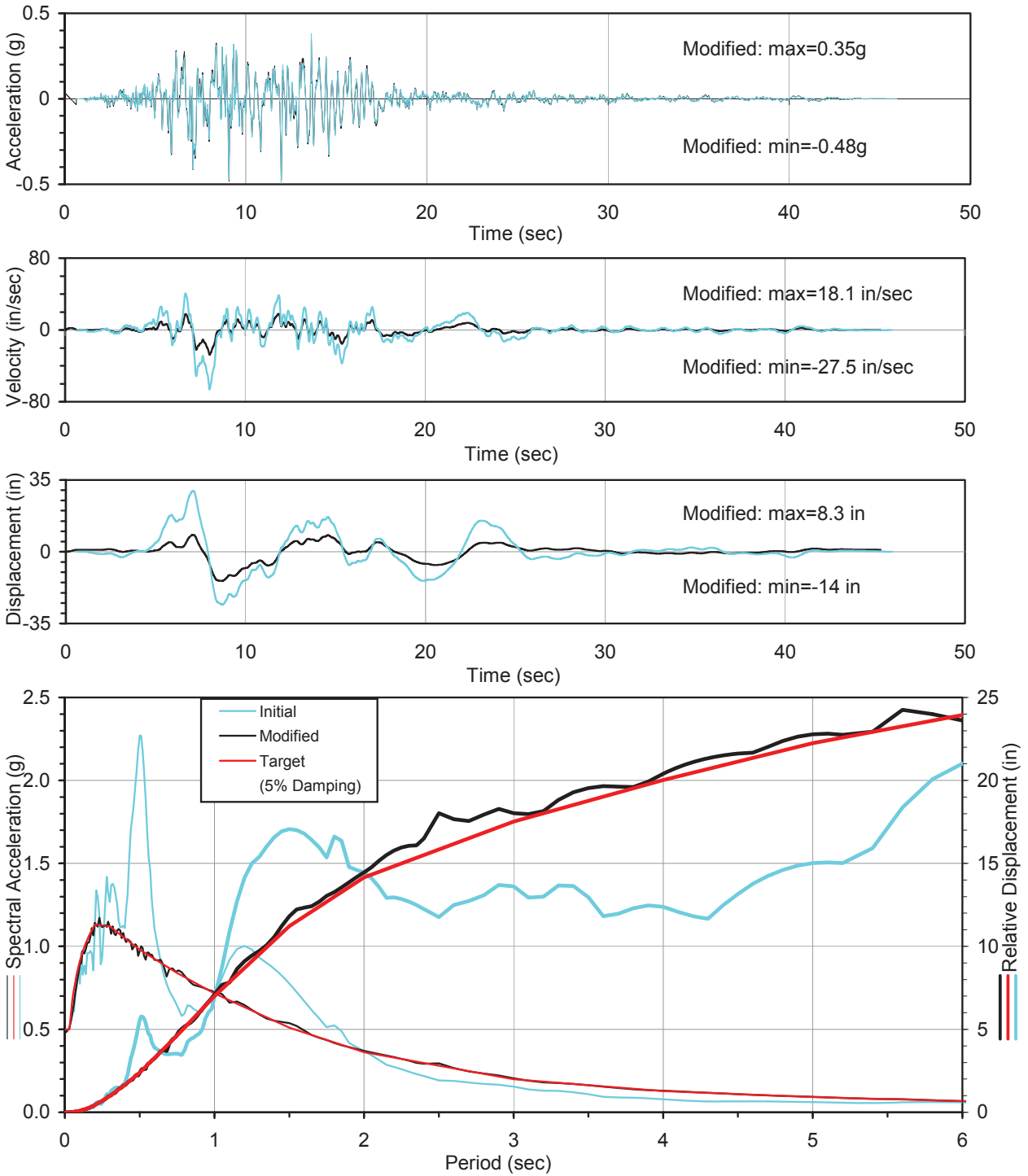


Figure D-15. Design Time Histories Compatible to CLE Design Spectra, Set 1  
(a) FN Component

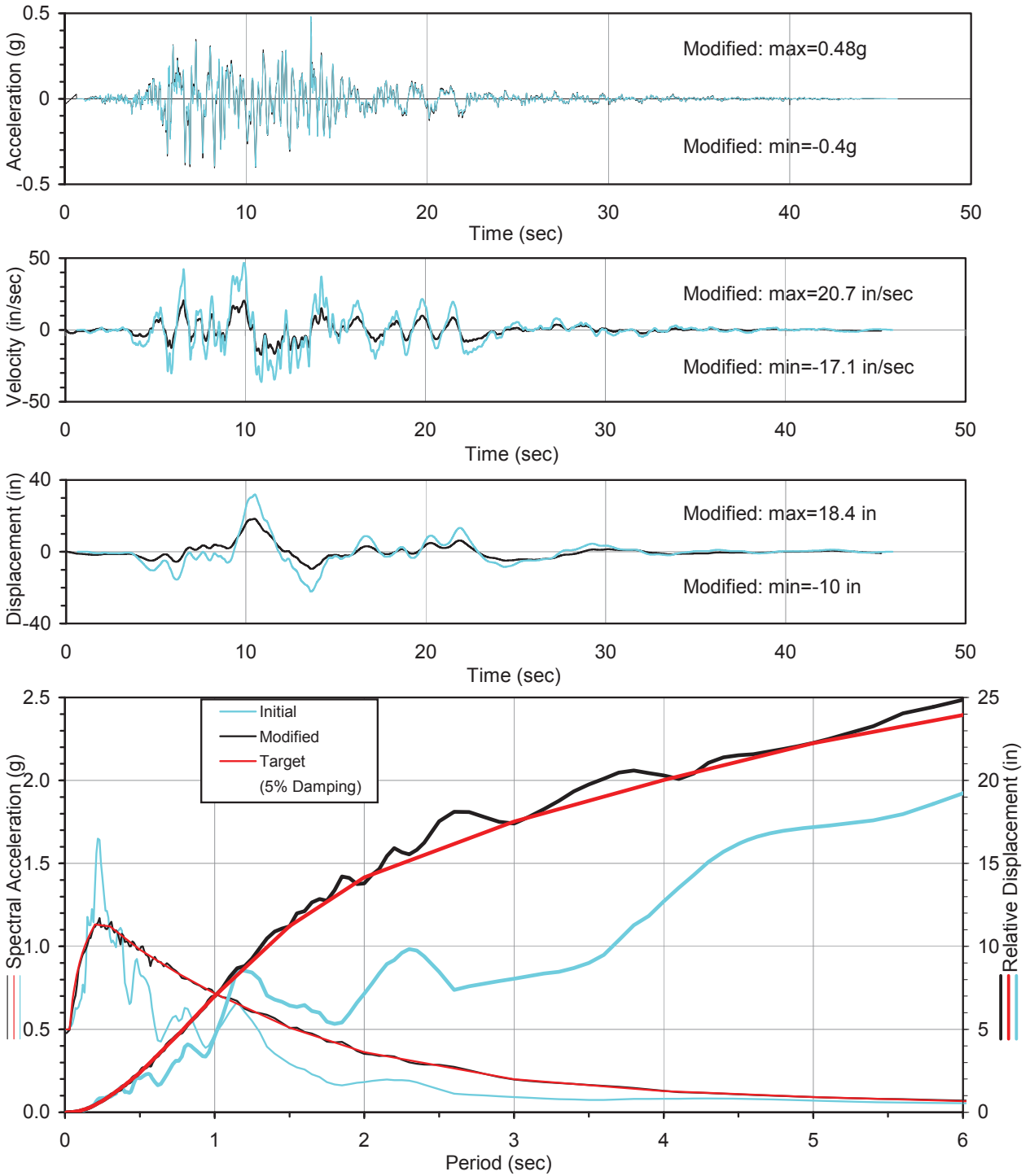


Figure D-15. Design Time Histories Compatible to CLE Design Spectra, Set 1  
(b) FP Component

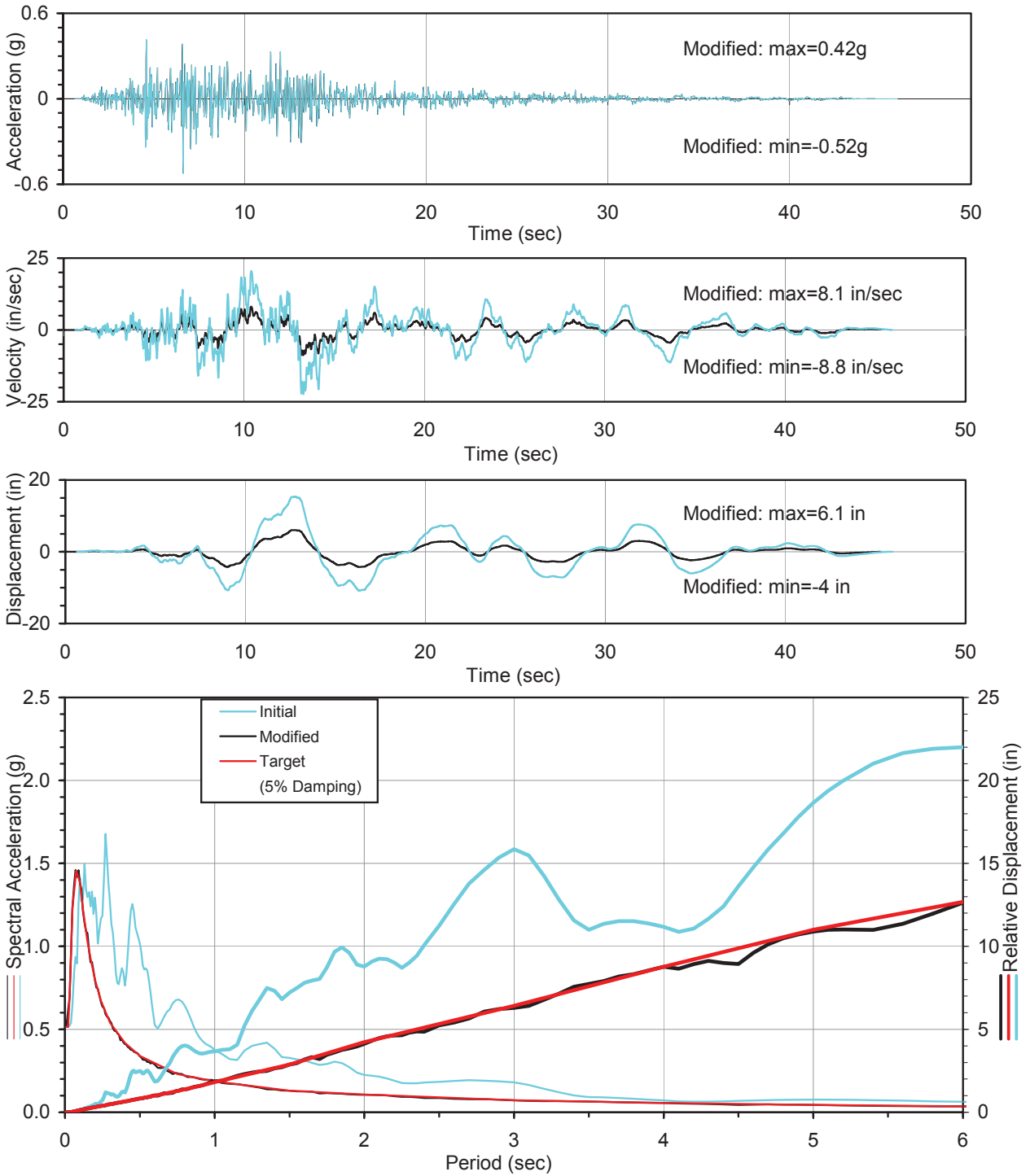


Figure D-15. Design Time Histories Compatible to CLE Design Spectra, Set 1  
(c) FV Component

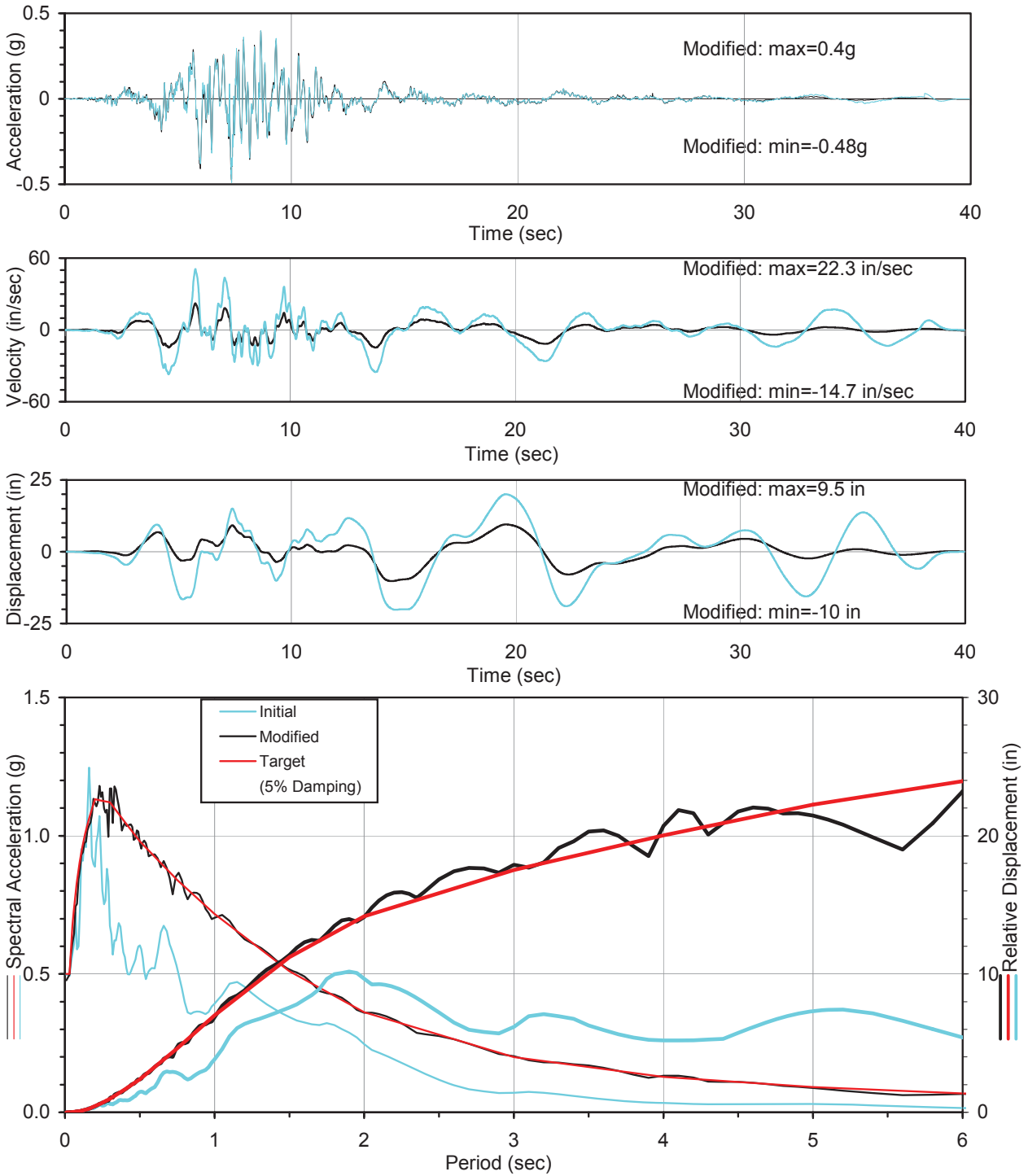


Figure D-16. Design Time Histories Compatible to CLE Design Spectra, Set 2  
(a) FN Component

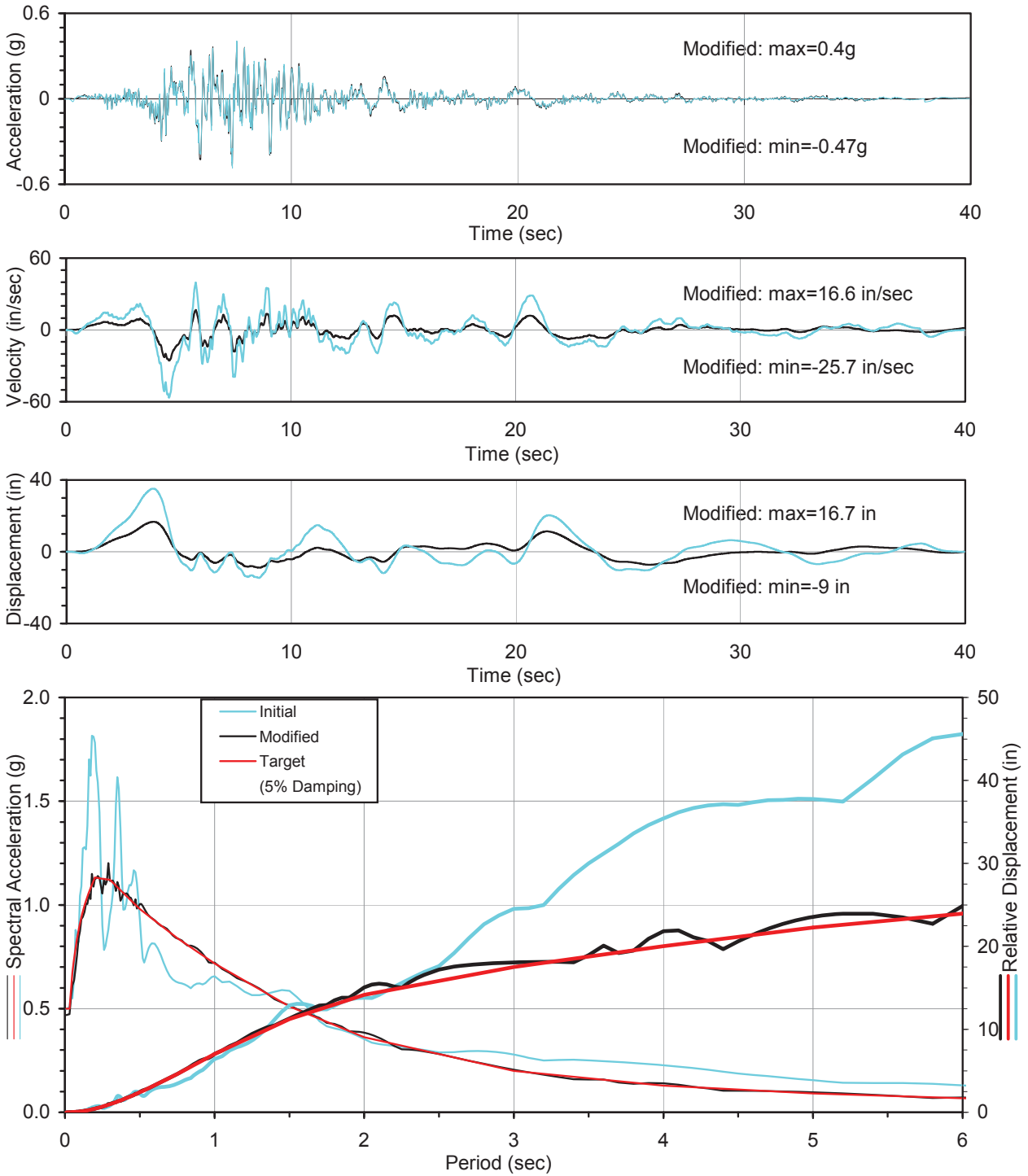
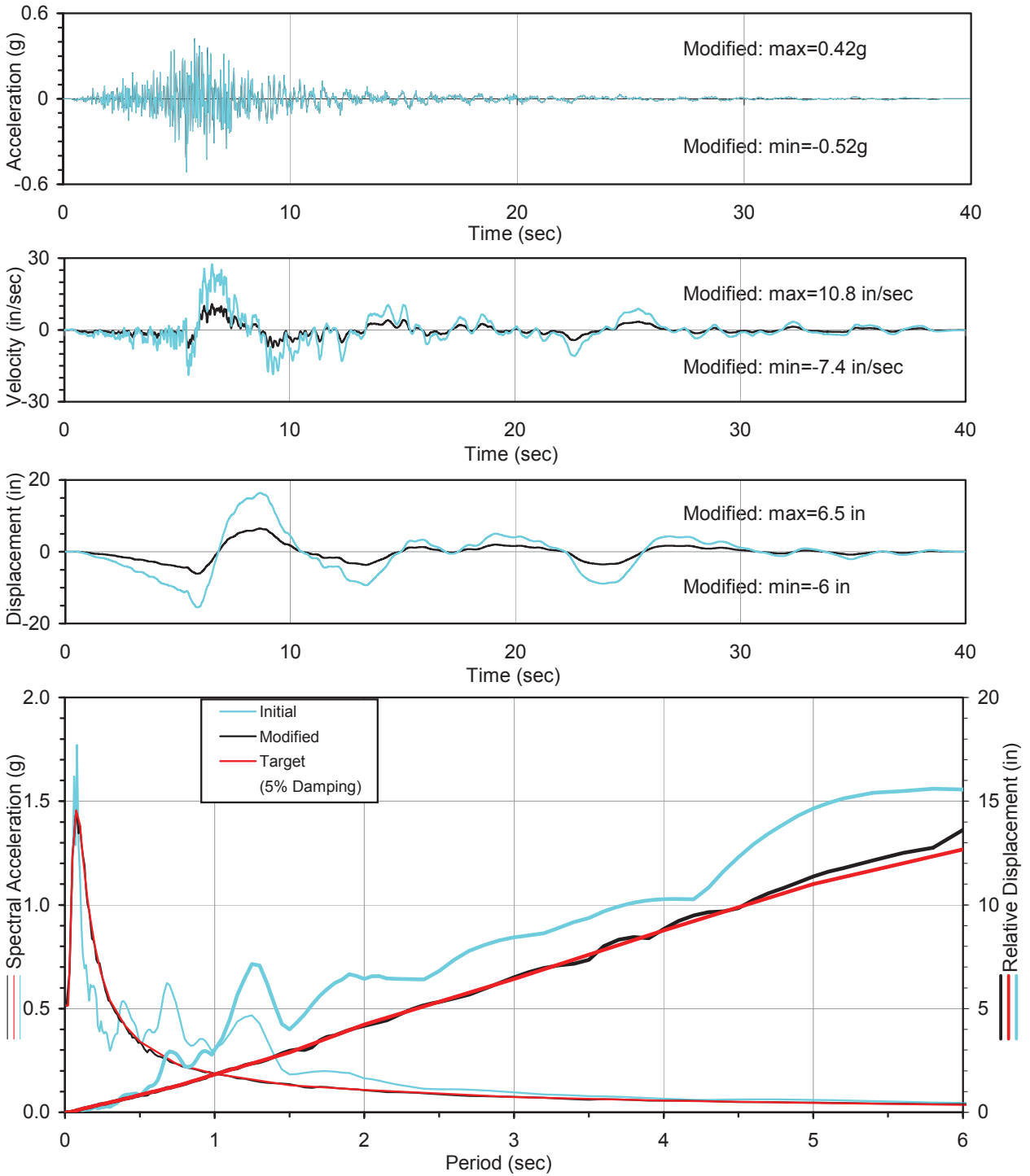


Figure D-16. Design Time Histories Compatible to CLE Design Spectra, Set 2  
(b) FP Component



**Figure D-16. Design Time Histories Compatible to CLE Design Spectra, Set 2  
(c) FV Component**

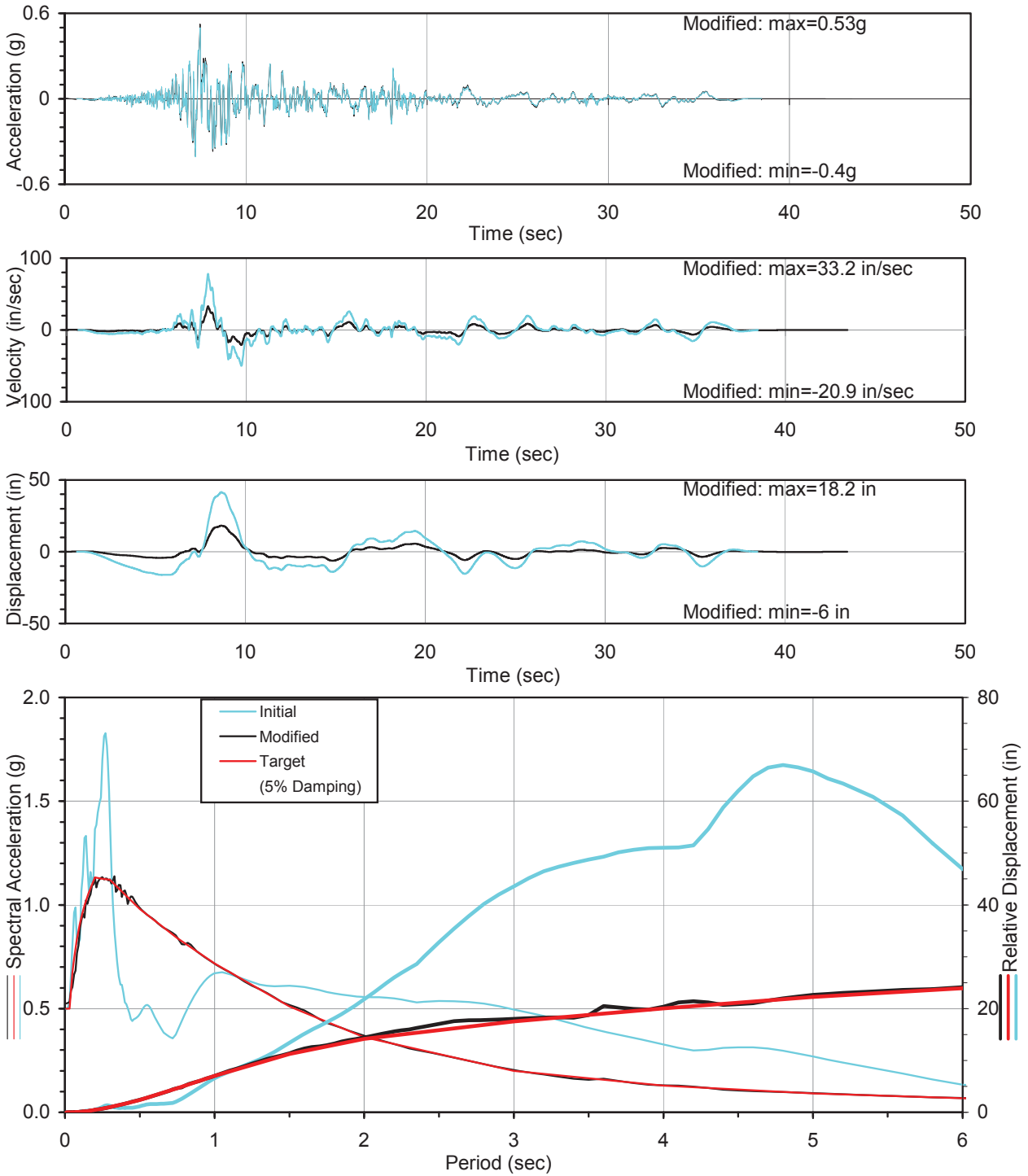


Figure D-17. Design Time Histories Compatible to CLE Design Spectra, Set 3  
(a) FN Component



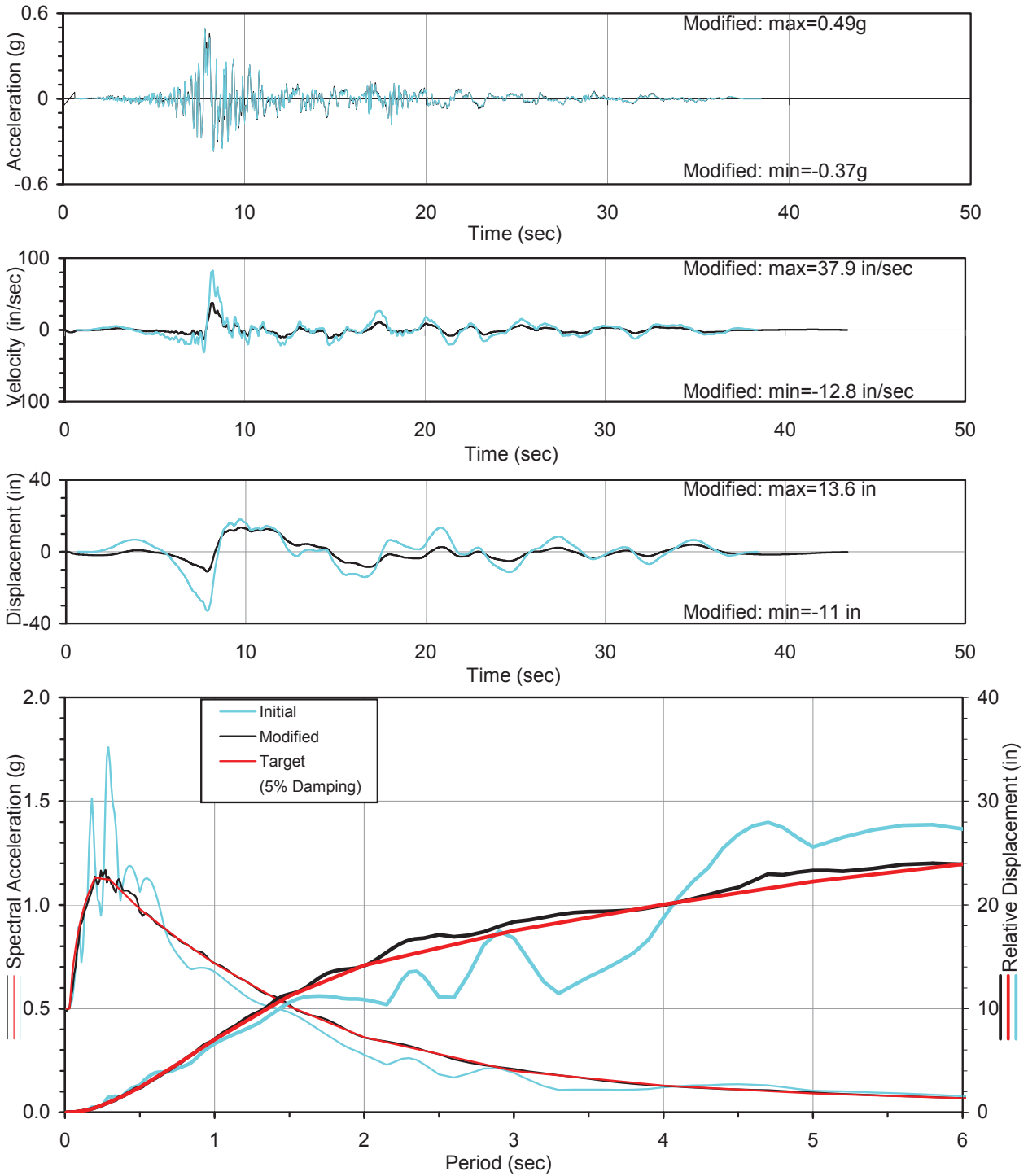


Figure D-17. Design Time Histories Compatible to CLE Design Spectra, Set 3  
(b) FP Component

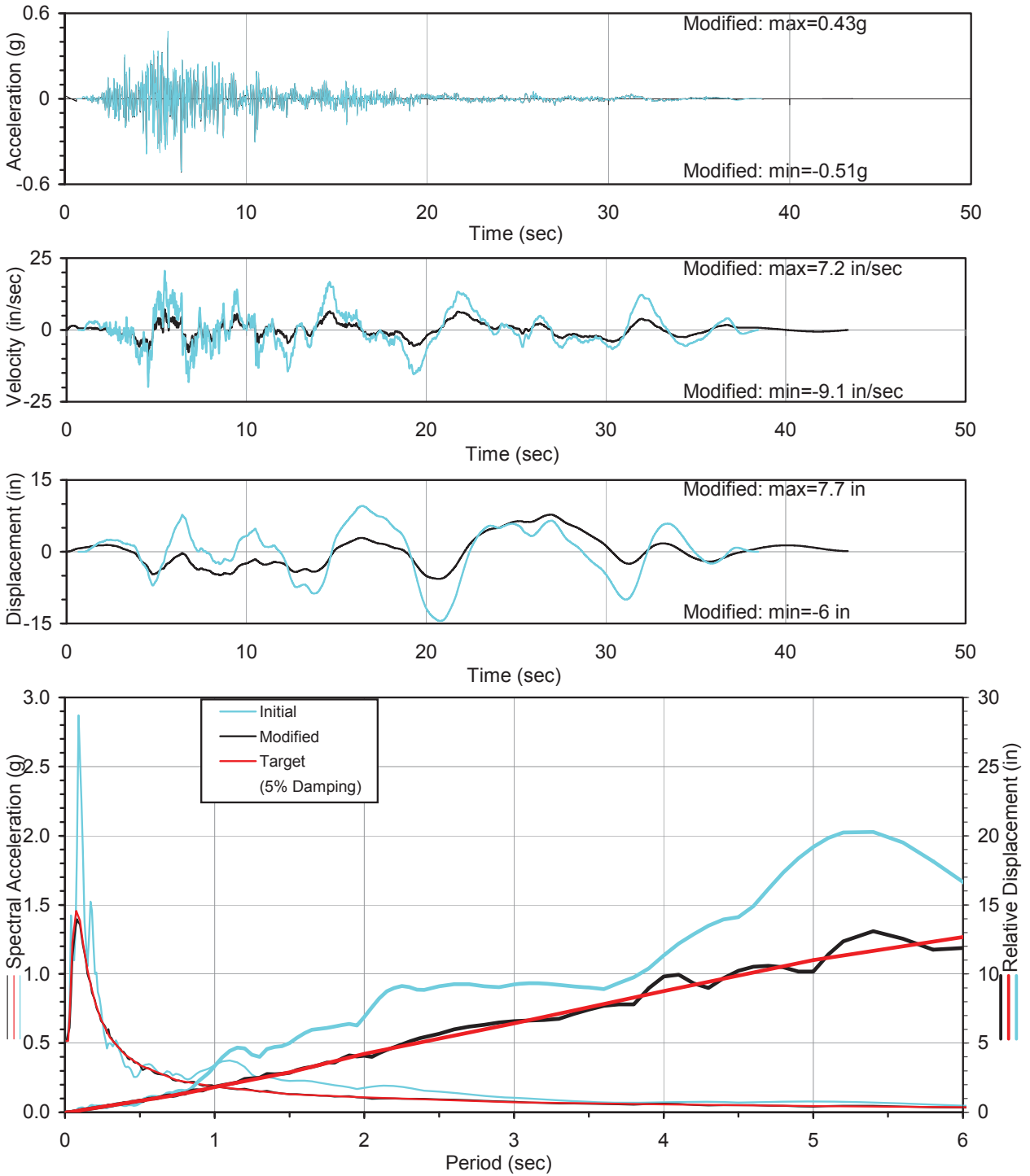


Figure D-17. Design Time Histories Compatible to CLE Design Spectra, Set 3  
(c) FV Component

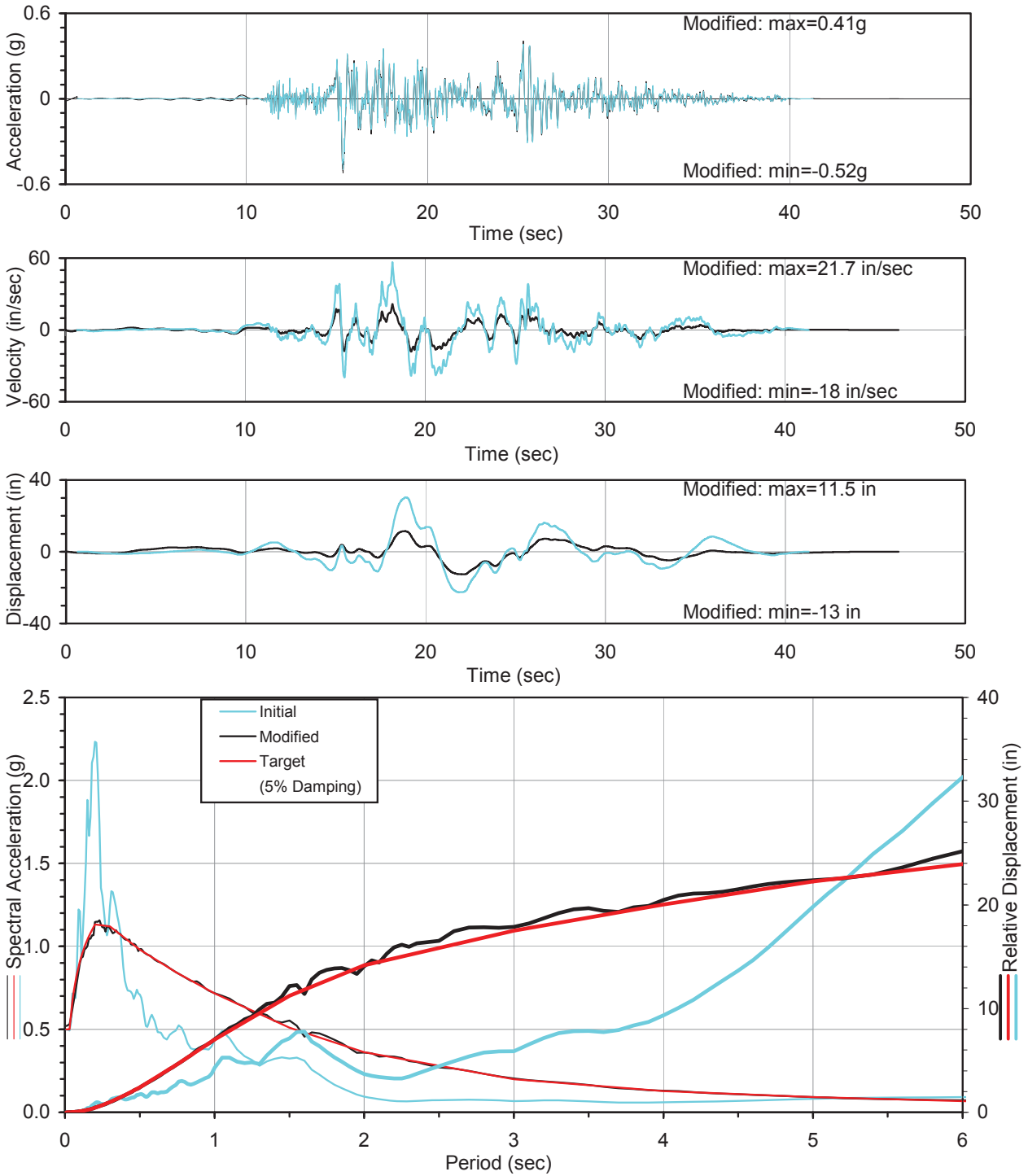


Figure D-18. Design Time Histories Compatible to CLE Design Spectra, Set 4  
(a) FN Component

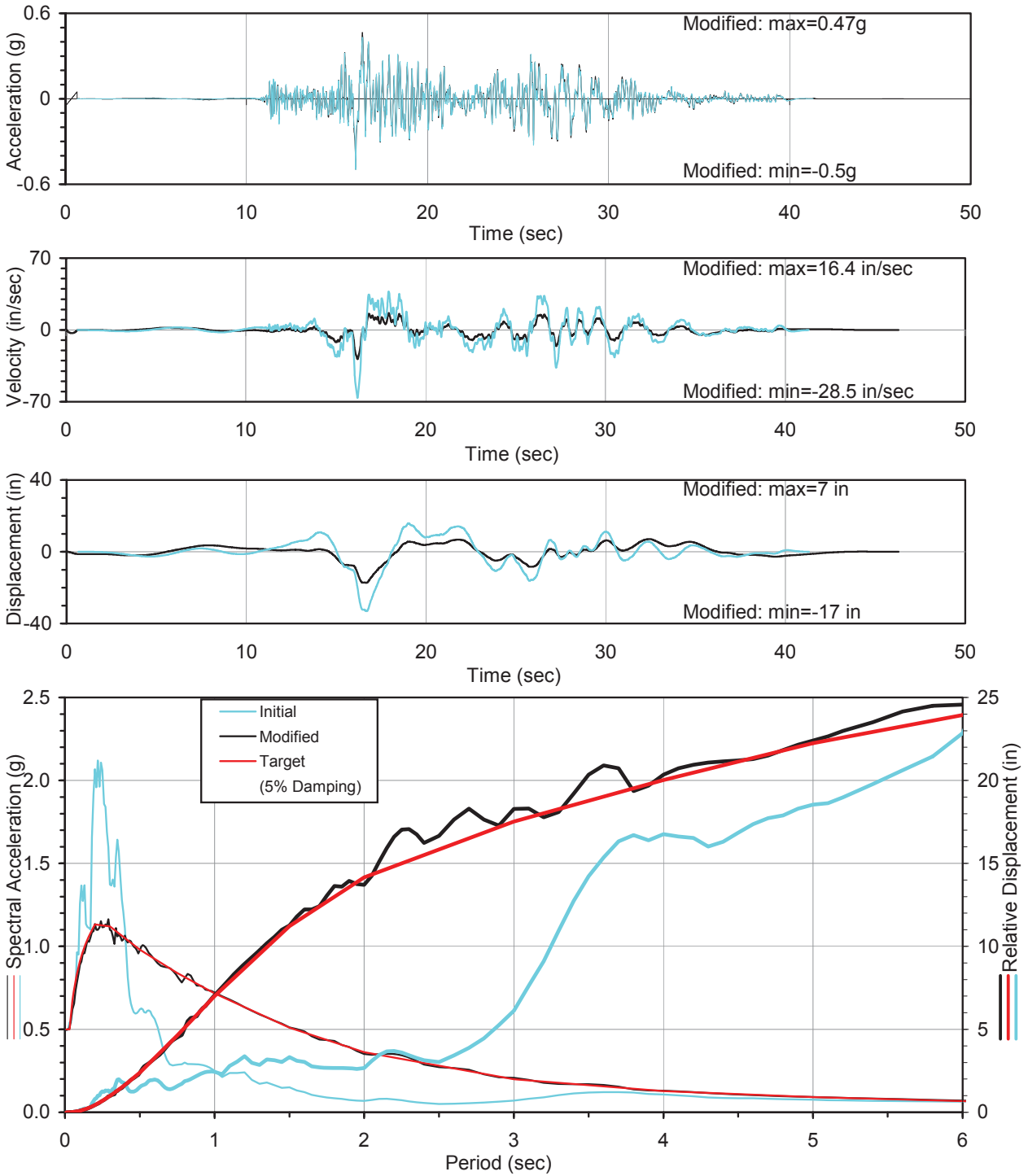


Figure D-18. Design Time Histories Compatible to CLE Design Spectra, Set 4  
(b) FP Component

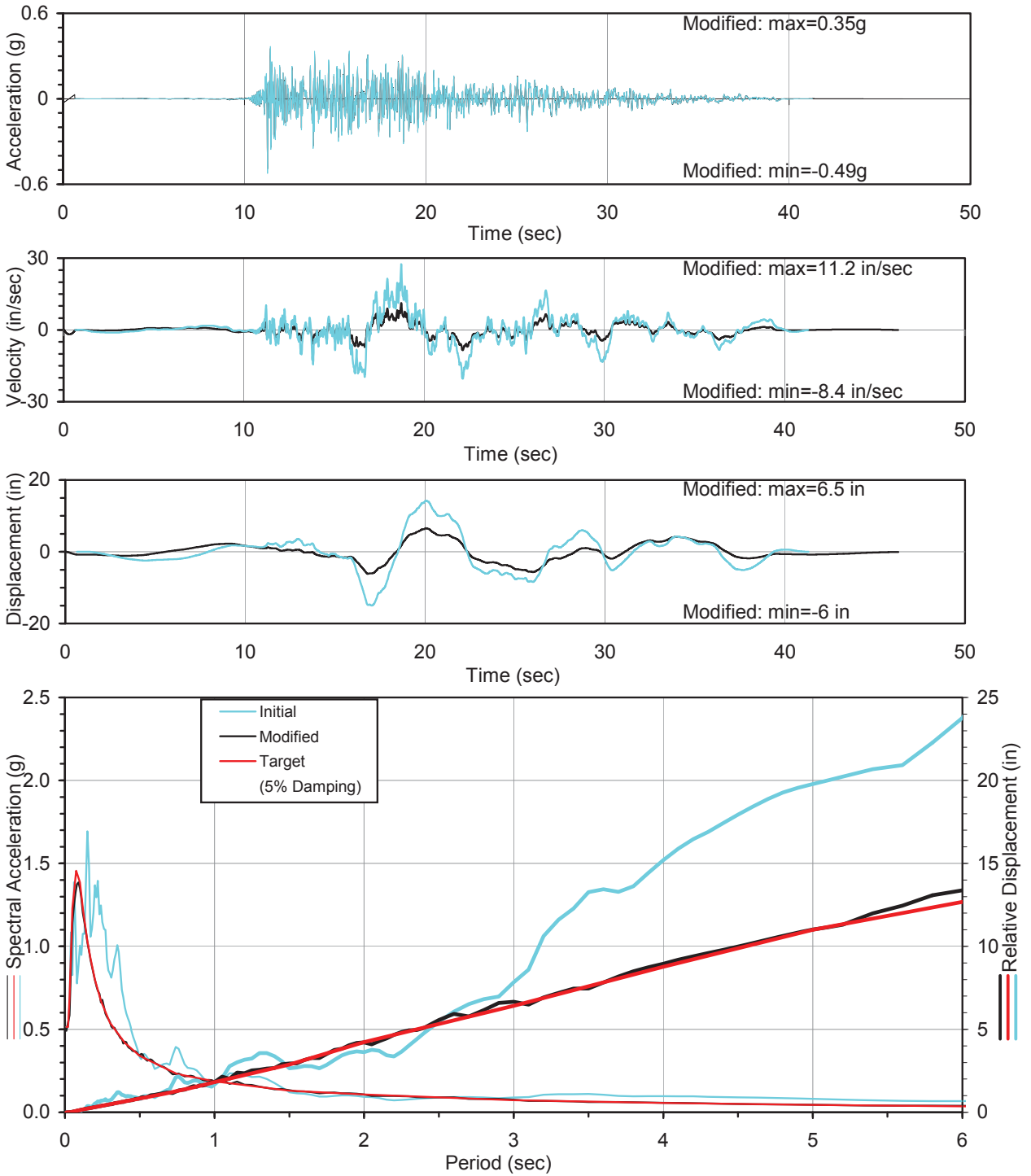
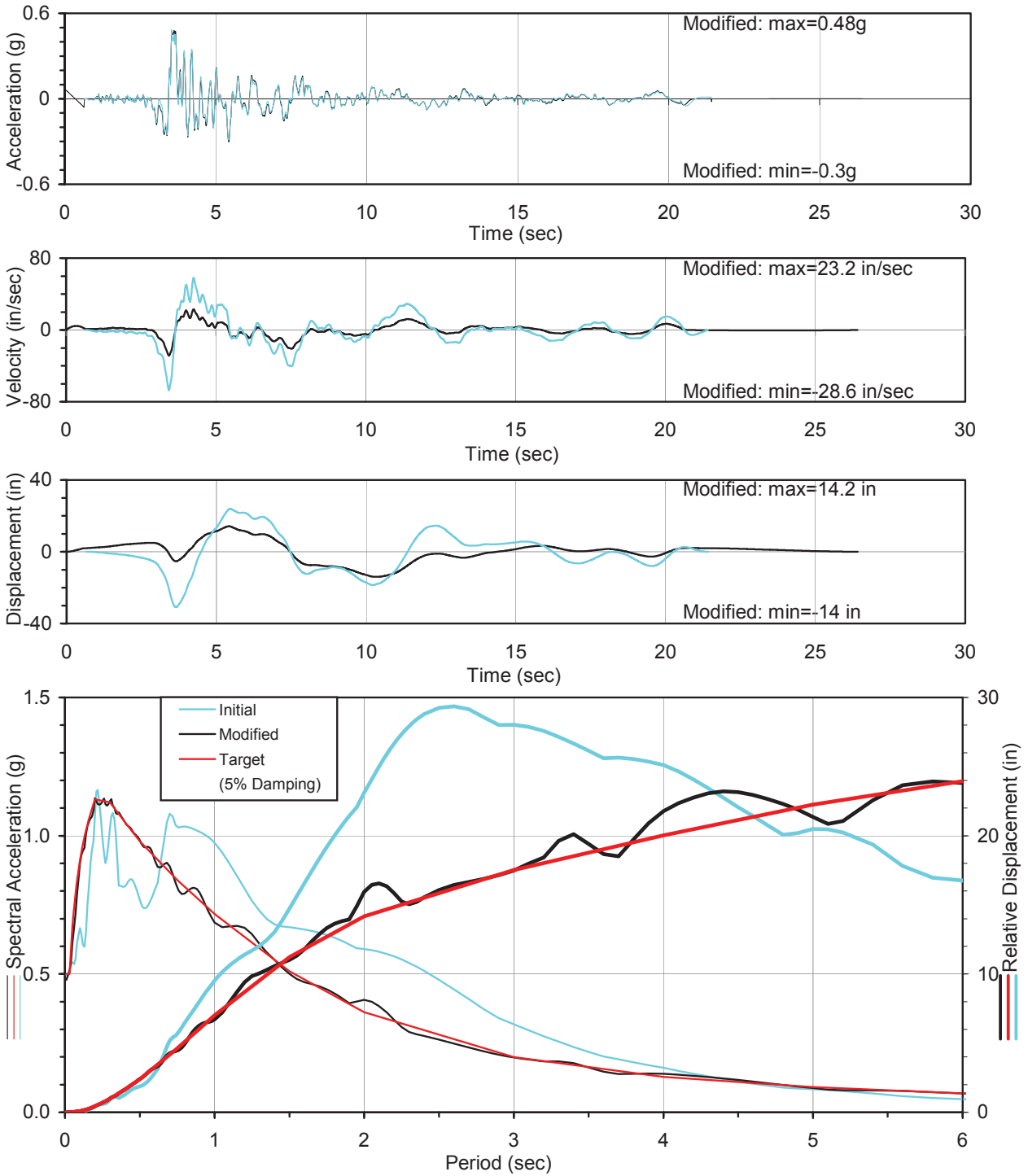


Figure D-18. Design Time Histories Compatible to CLE Design Spectra, Set 4  
(c) FV Component



**Figure D-19. Design Time Histories Compatible to CLE Design Spectra, Set 5  
(a) FN Component**

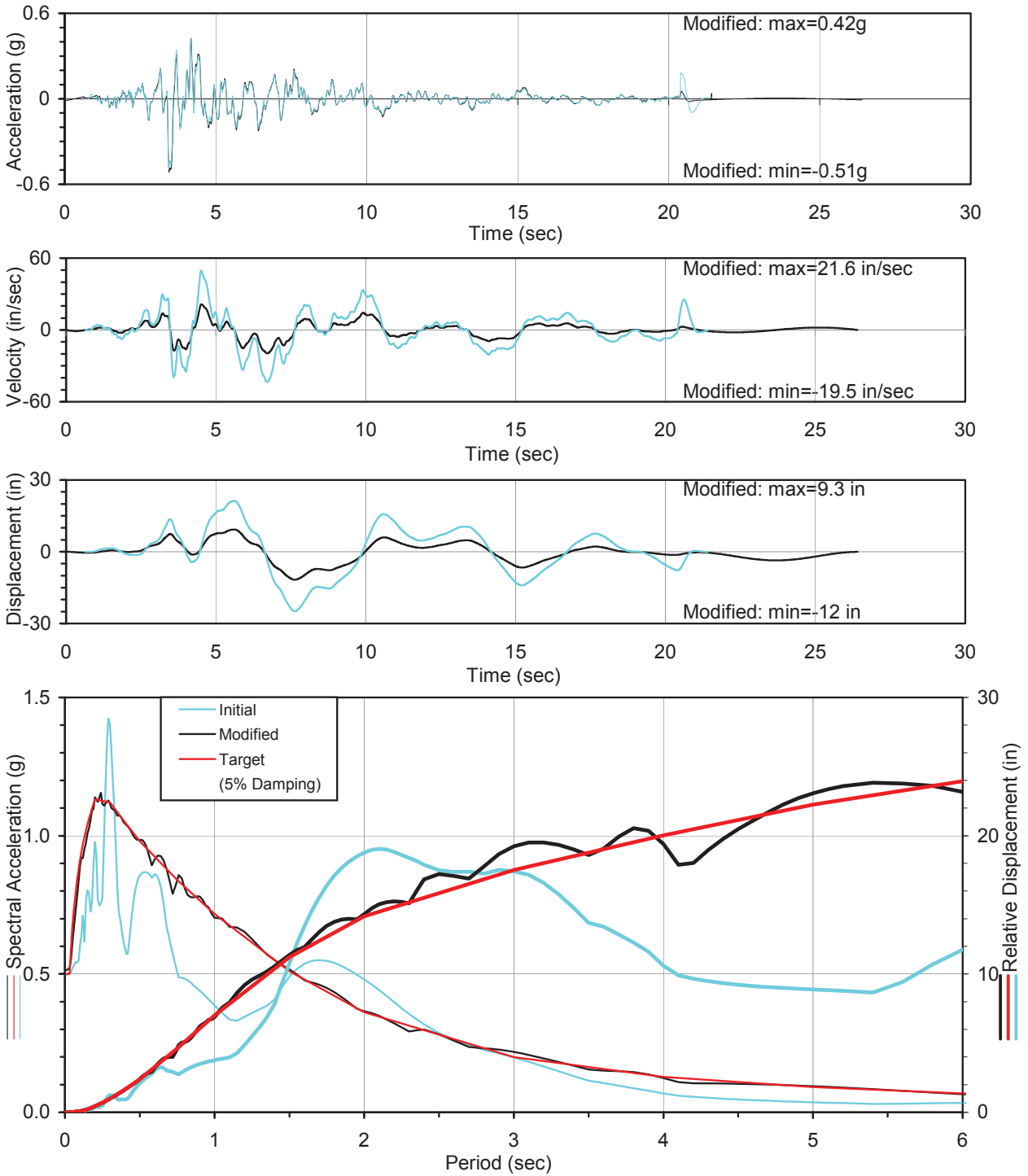


Figure D-19. Design Time Histories Compatible to CLE Design Spectra, Set 5  
(b) FP Component

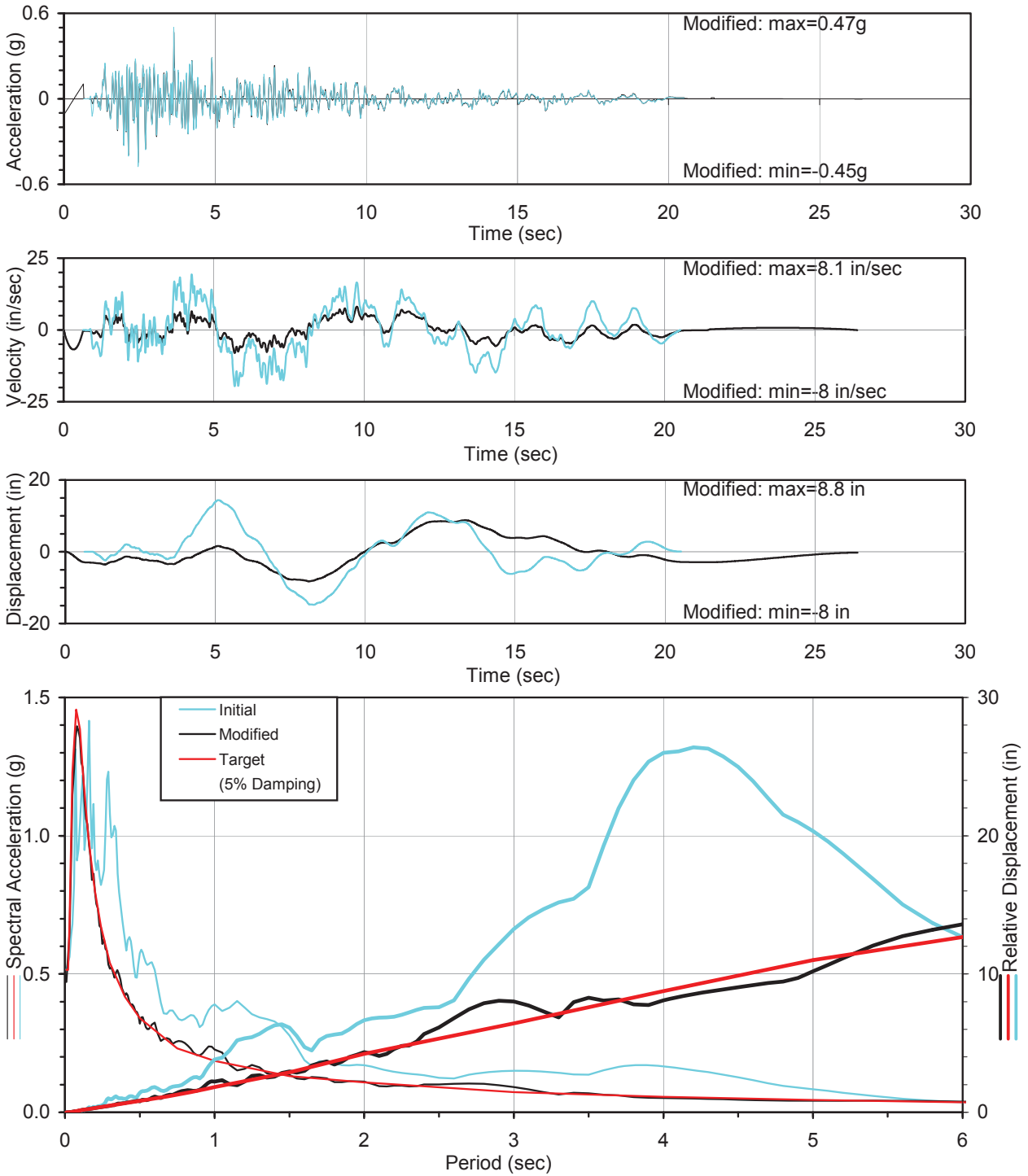


Figure D-19. Design Time Histories Compatible to CLE Design Spectra, Set 5  
(c) FV Component



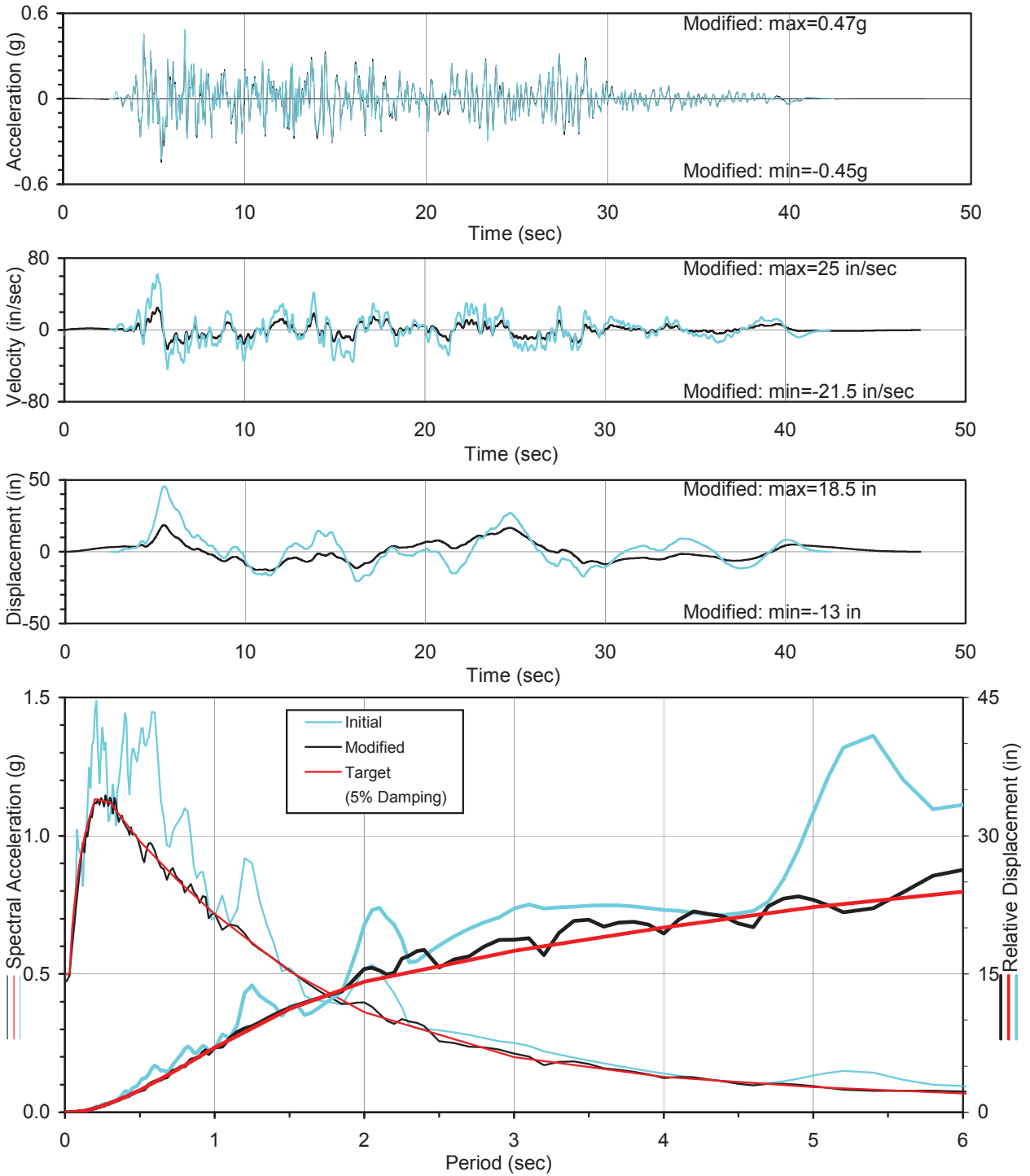


Figure D-20. Design Time Histories Compatible to CLE Design Spectra, Set 6  
(a) FN Component

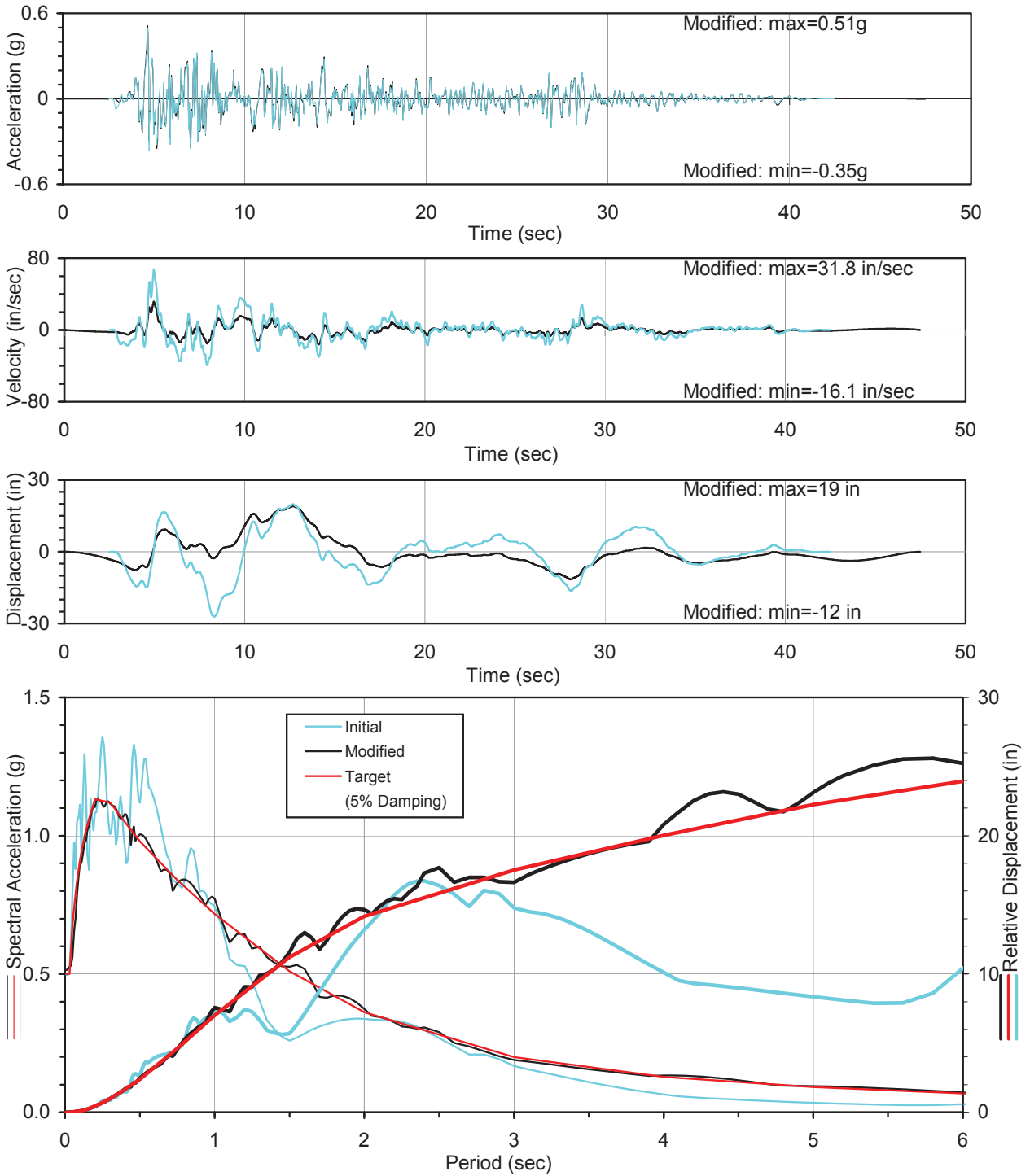


Figure D-20. Design Time Histories Compatible to CLE Design Spectra, Set 6  
(b) FP Component

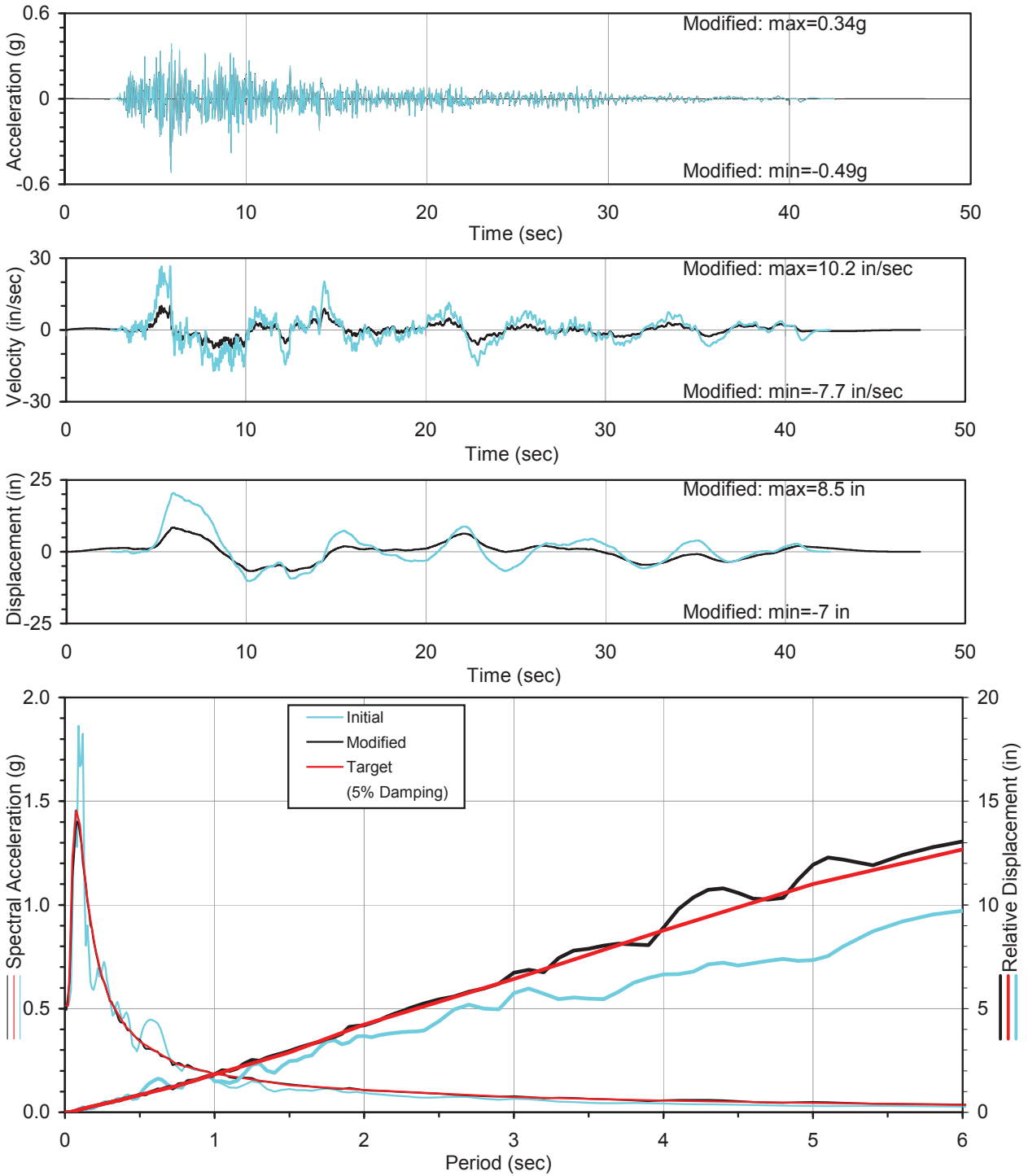


Figure D-20. Design Time Histories Compatible to CLE Design Spectra, Set 6  
(c) FV Component

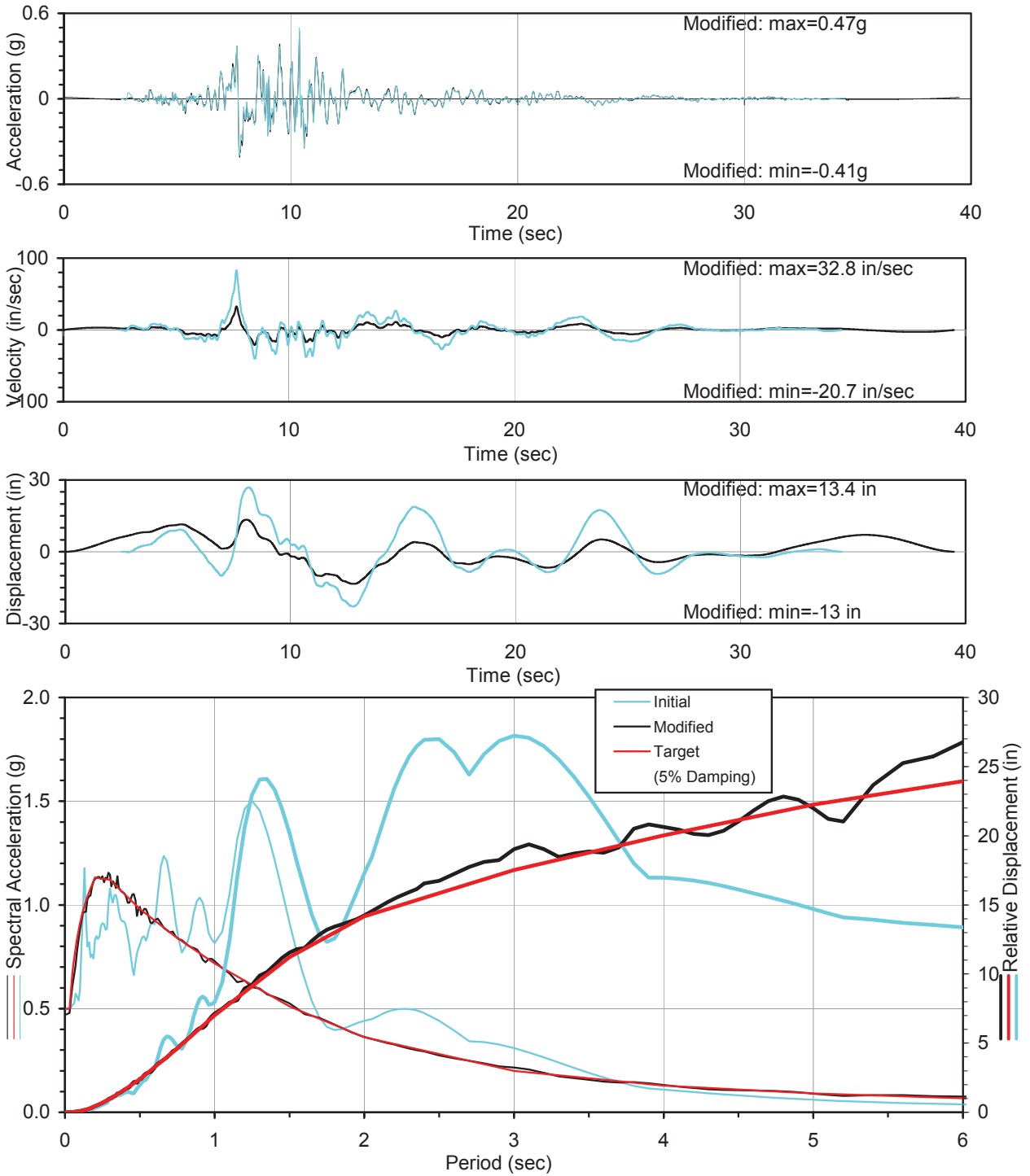


Figure D-21. Design Time Histories Compatible to CLE Design Spectra, Set 7  
(a) FN Component

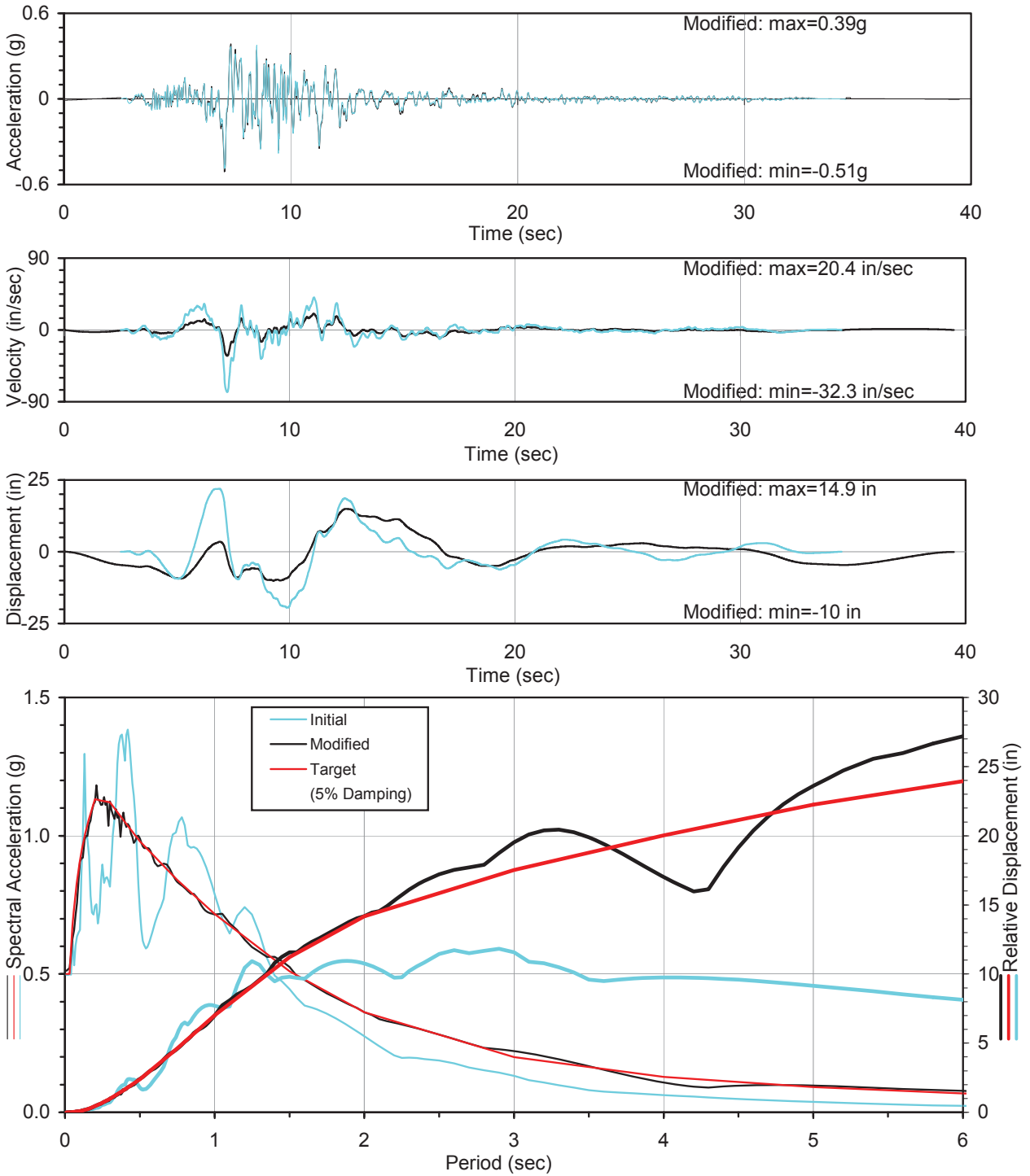


Figure D-21. Design Time Histories Compatible to CLE Design Spectra, Set 7  
(b) FP Component

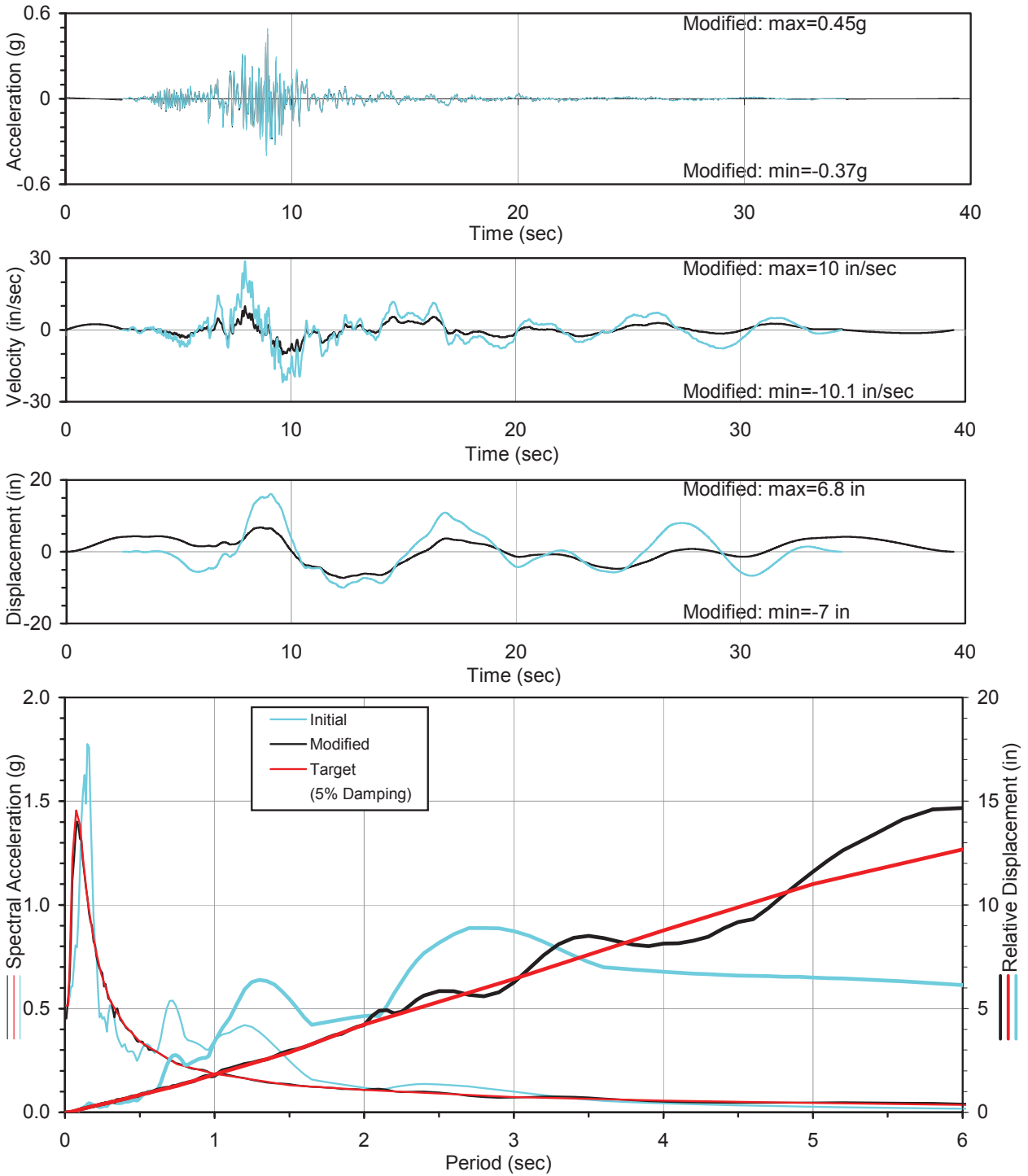


Figure D-21. Design Time Histories Compatible to CLE Design Spectra, Set 7  
(c) FV Component

#### **D.4 DESIGN TIME HISTORIES COMPATIBLE TO OLE DESIGN SPECTRA**

Seven (7) sets of 3-component time histories were generated using the initial firm-ground motion presented in Section D.2 to be spectrum-compatible to the design response spectrum adjusted for the site-specific soil conditions for the Operating-Level earthquake event (Figures 5-10 and 5-11).

For each of the 21 time histories, the following is plotted:

- Initial acceleration, velocity and displacement time histories scaled to PGA,
- Modified (spectrum-matched) acceleration, velocity and displacement time histories,
- Comparison of the target CLE design spectrum and the spectrum of the modified time histories.

These plots are shown in Figure D-22 through Figure D-28 for the OLE design time history set number 1 through set number 7 (see Table D-2), respectively.

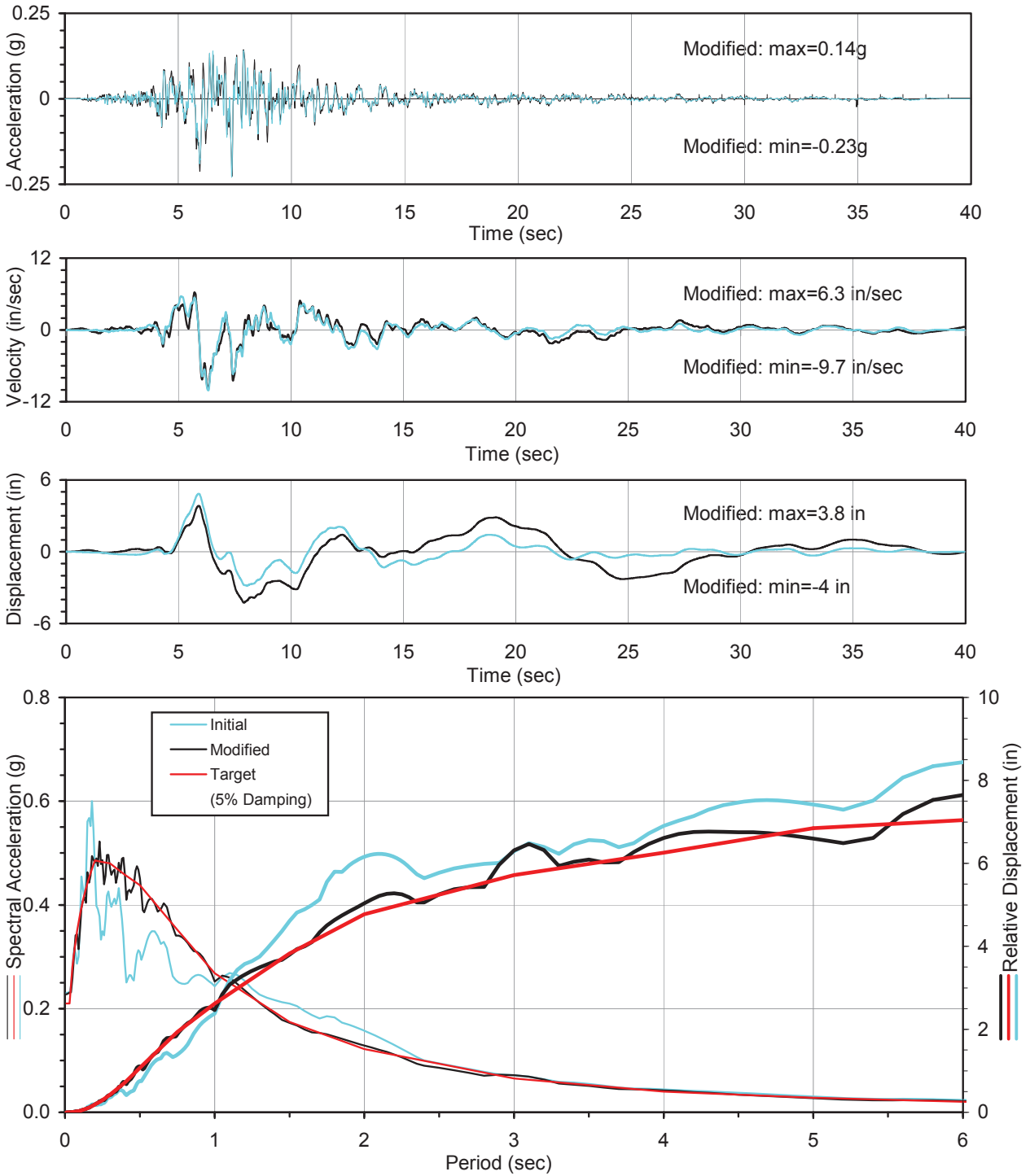


Figure D-22. Design Time Histories Compatible to OLE Design Spectra, Set 1  
(a) FN Component



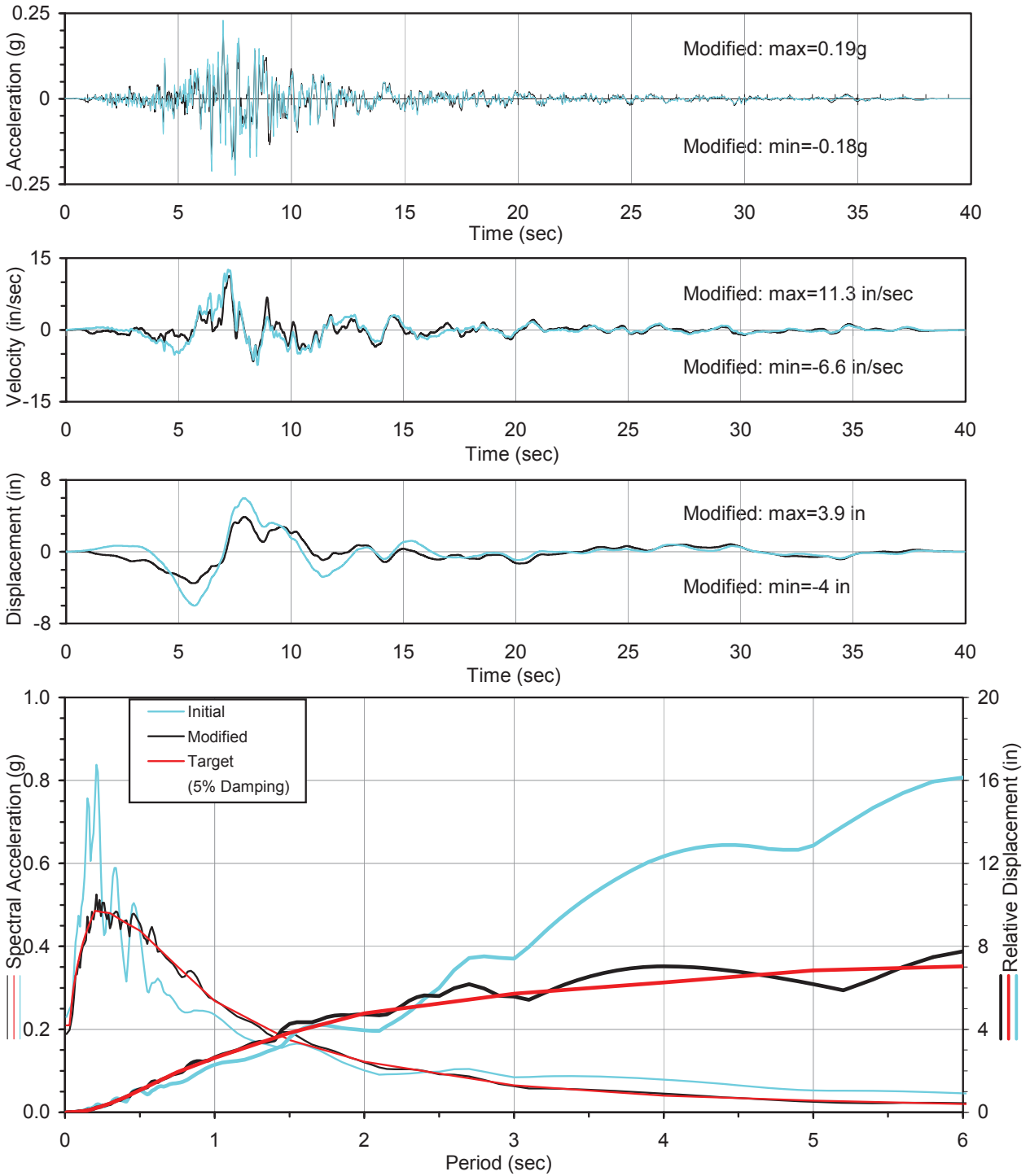


Figure D-22 Design Time Histories Compatible to OLE Design Spectra, Set 1  
(b) FP Component

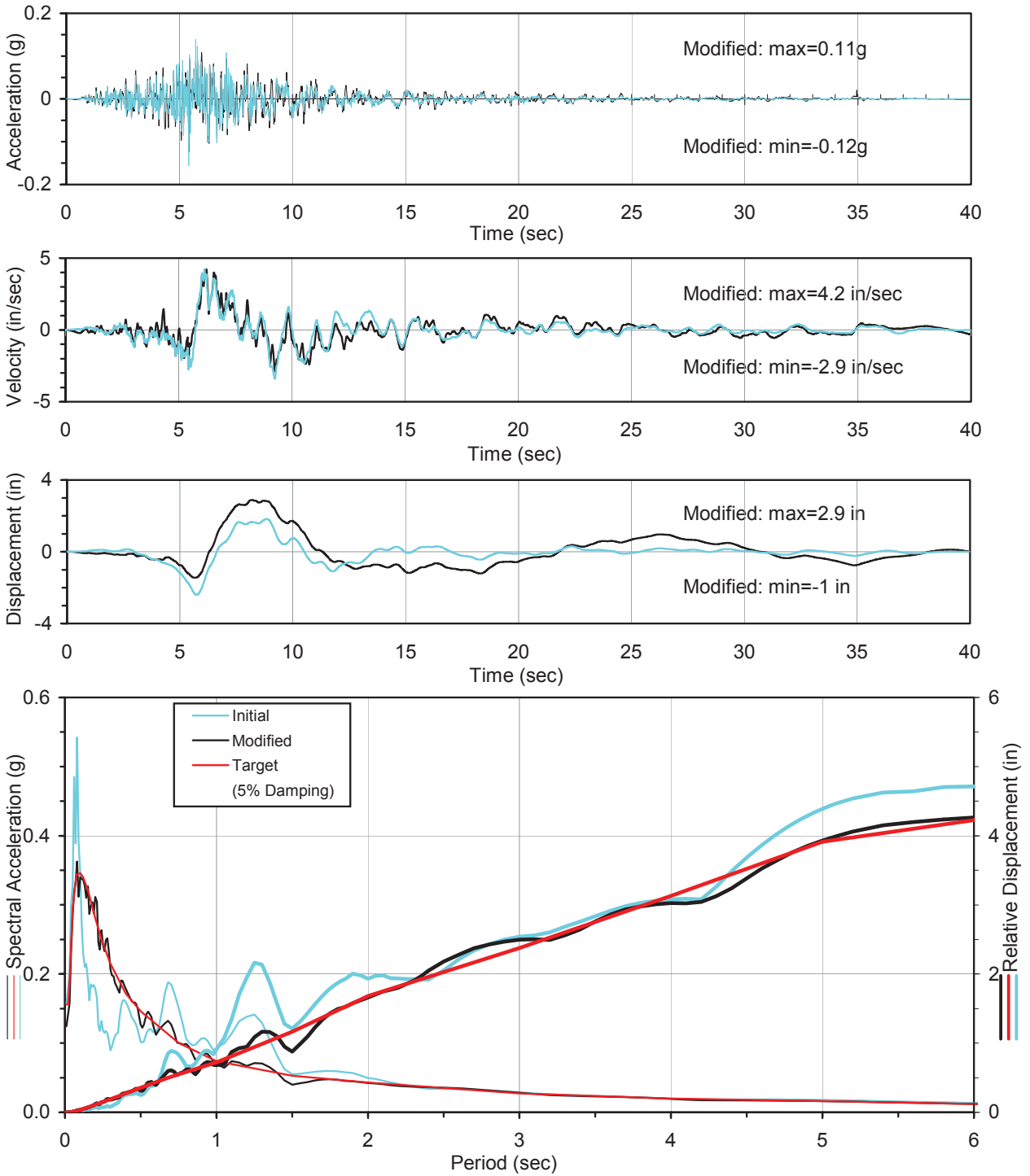


Figure D-22. Design Time Histories Compatible to OLE Design Spectra, Set 1  
 (c) FV Component

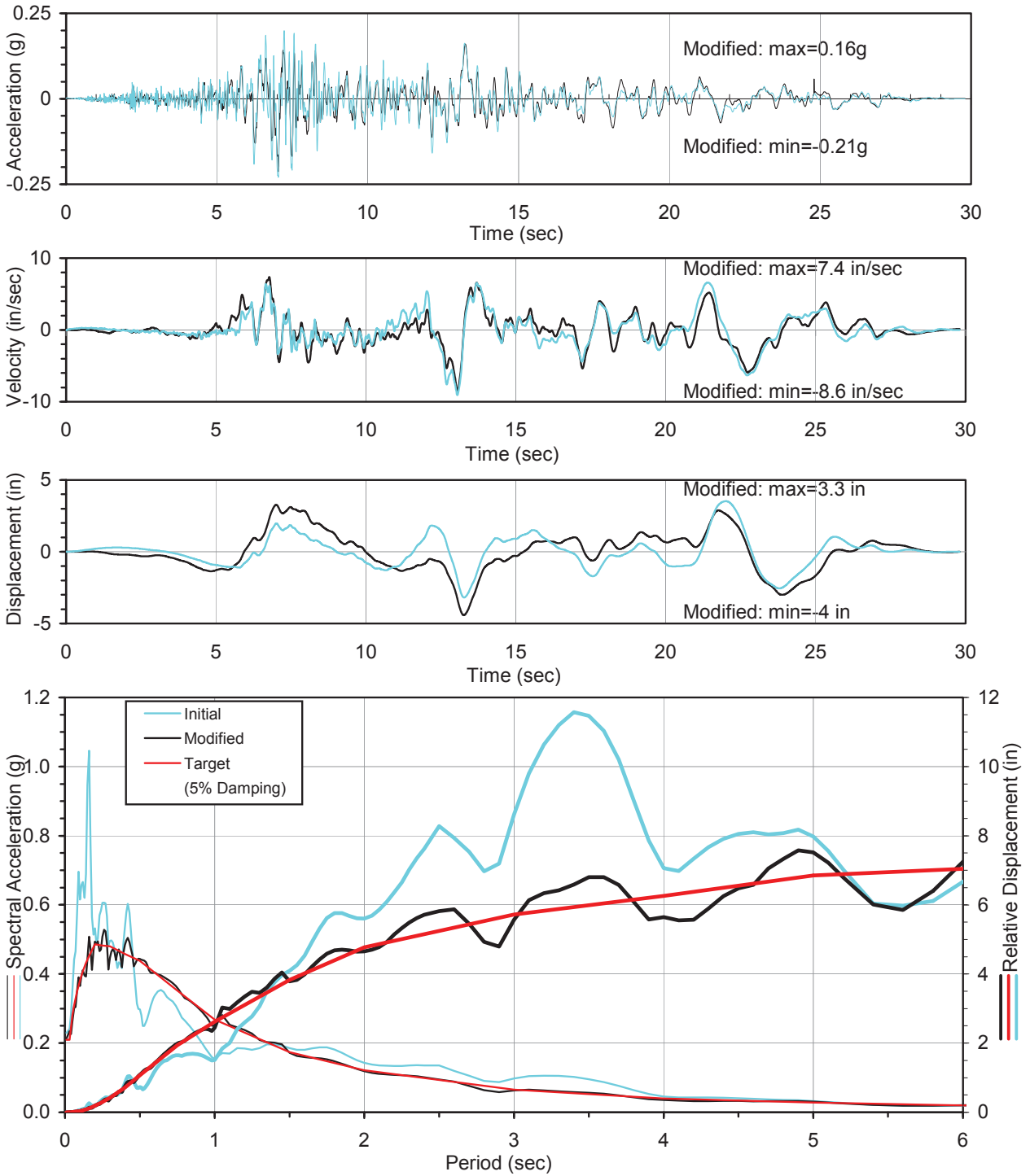


Figure D-23. Design Time Histories Compatible to OLE Design Spectra, Set 2  
(a) FN Component

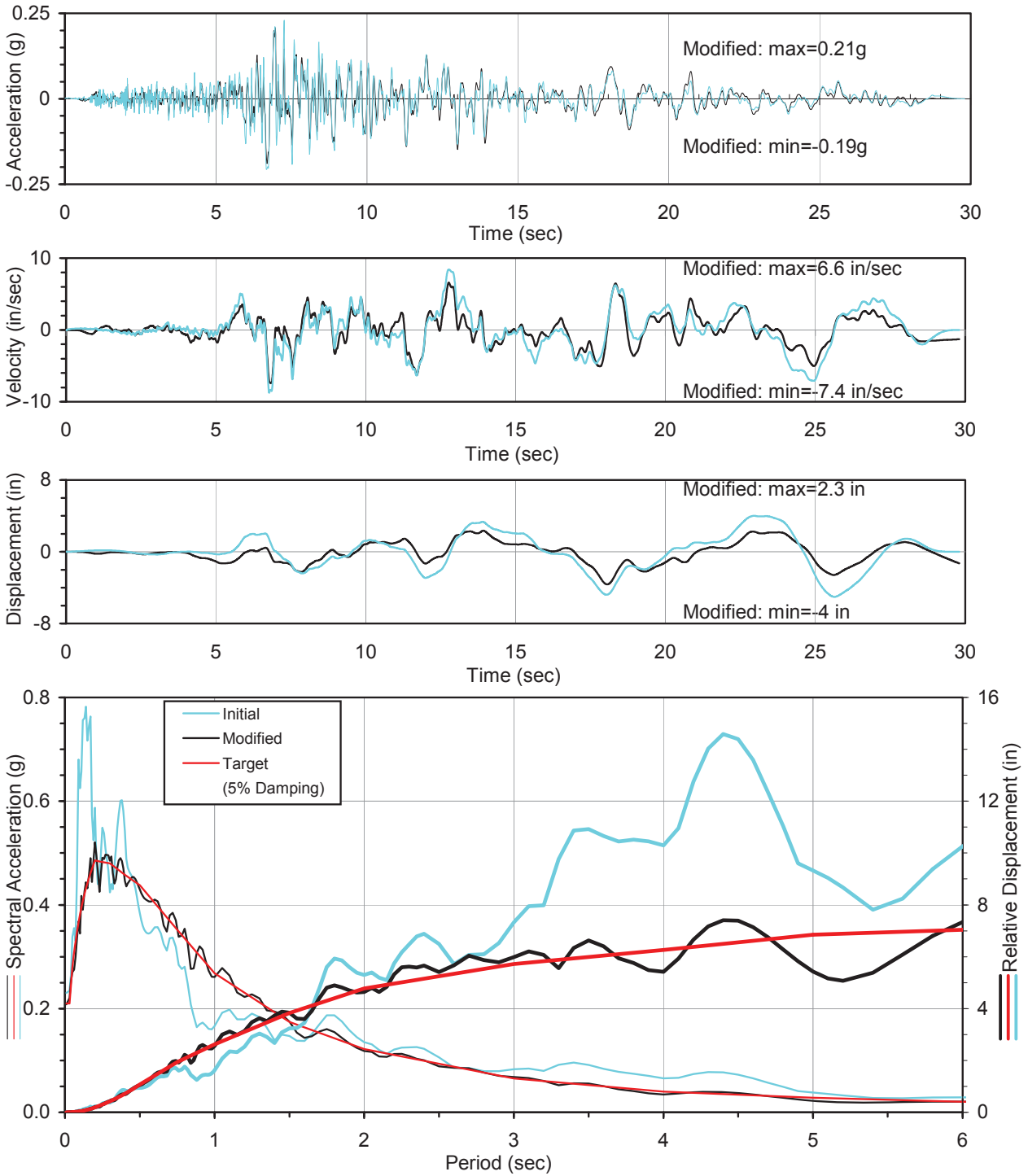


Figure D-23 Design Time Histories Compatible to OLE Design Spectra, Set 2  
 (b) FP Component

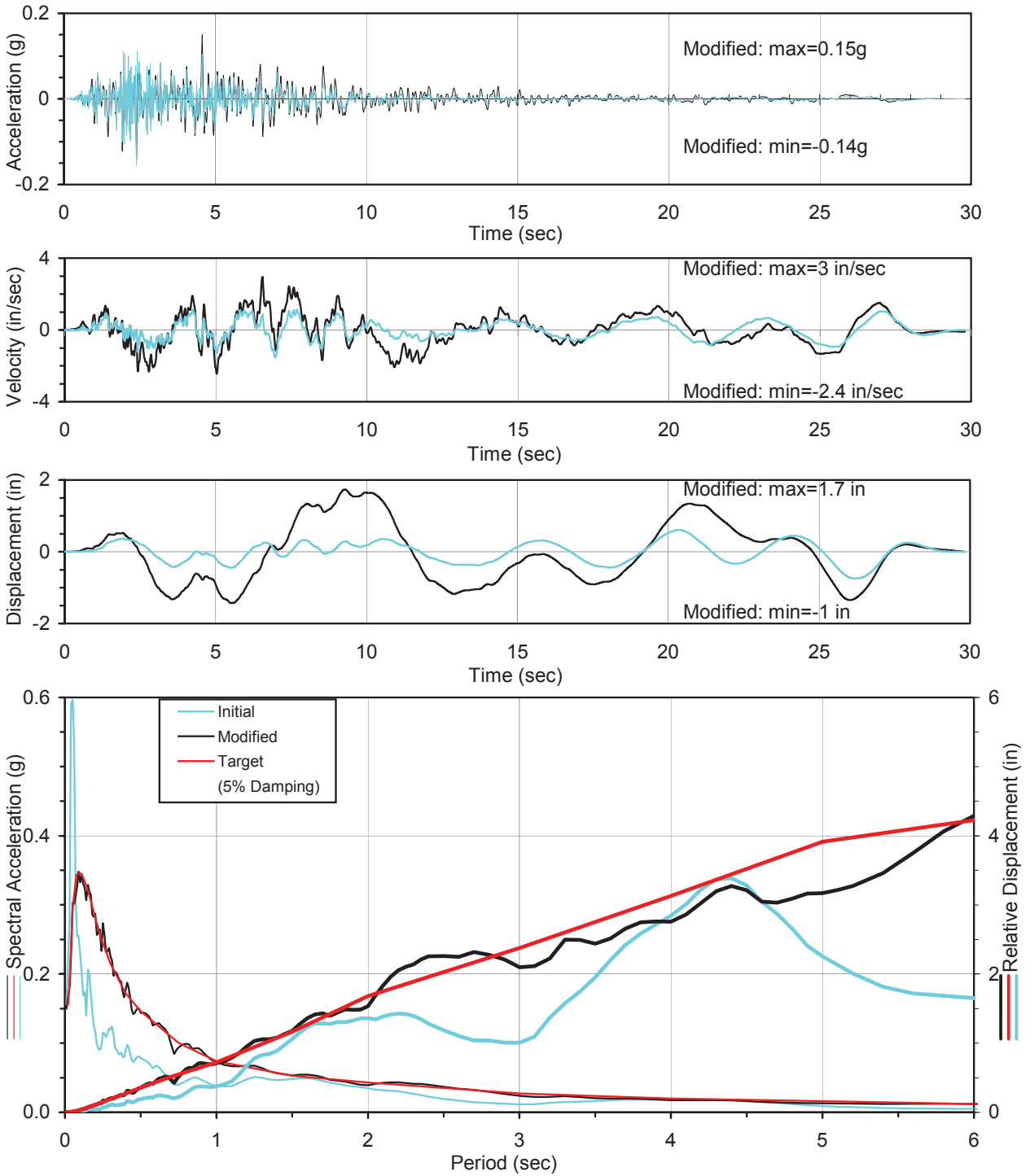


Figure D-23. Design Time Histories Compatible to OLE Design Spectra, Set 2  
 (c) FV Component

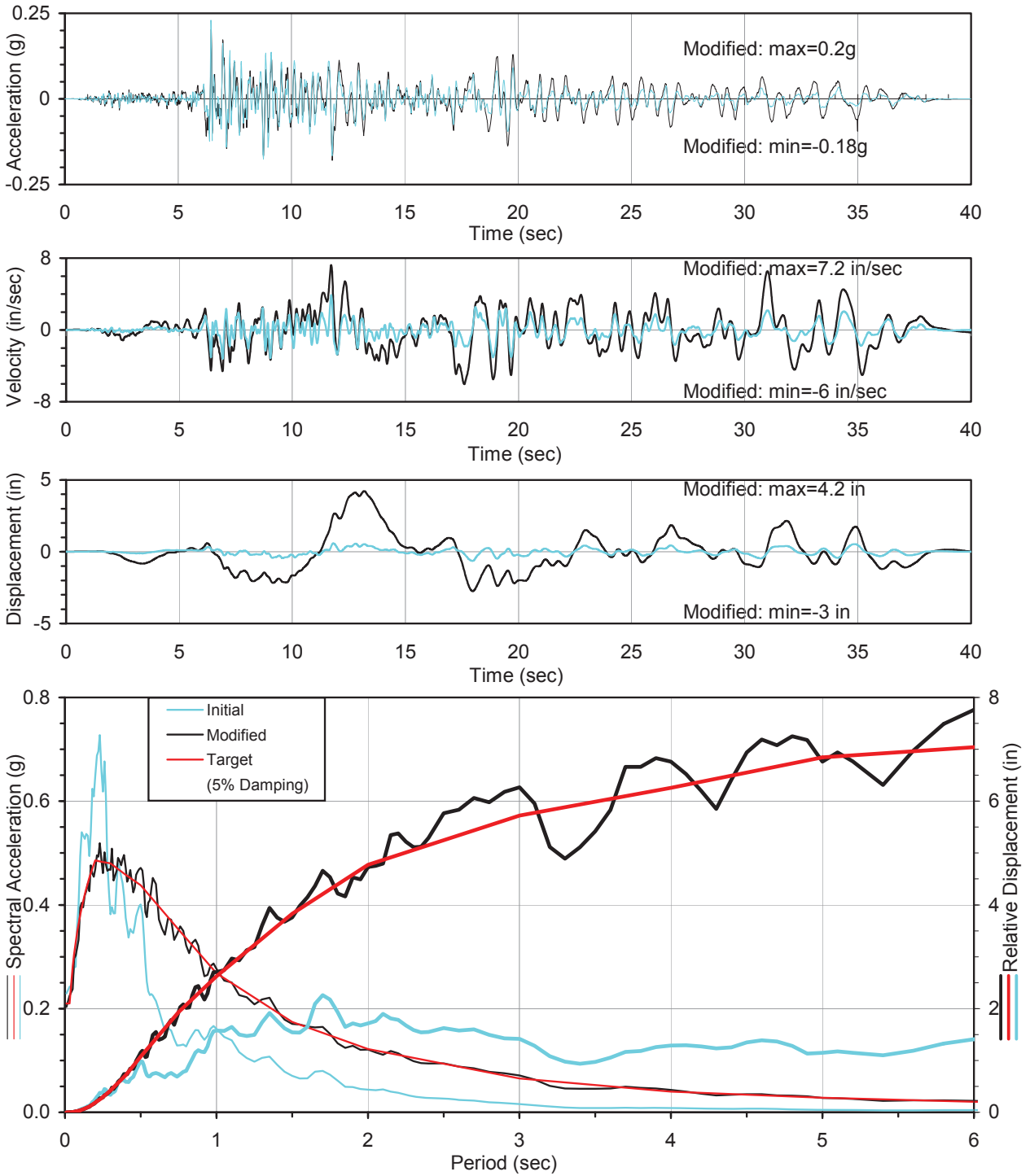
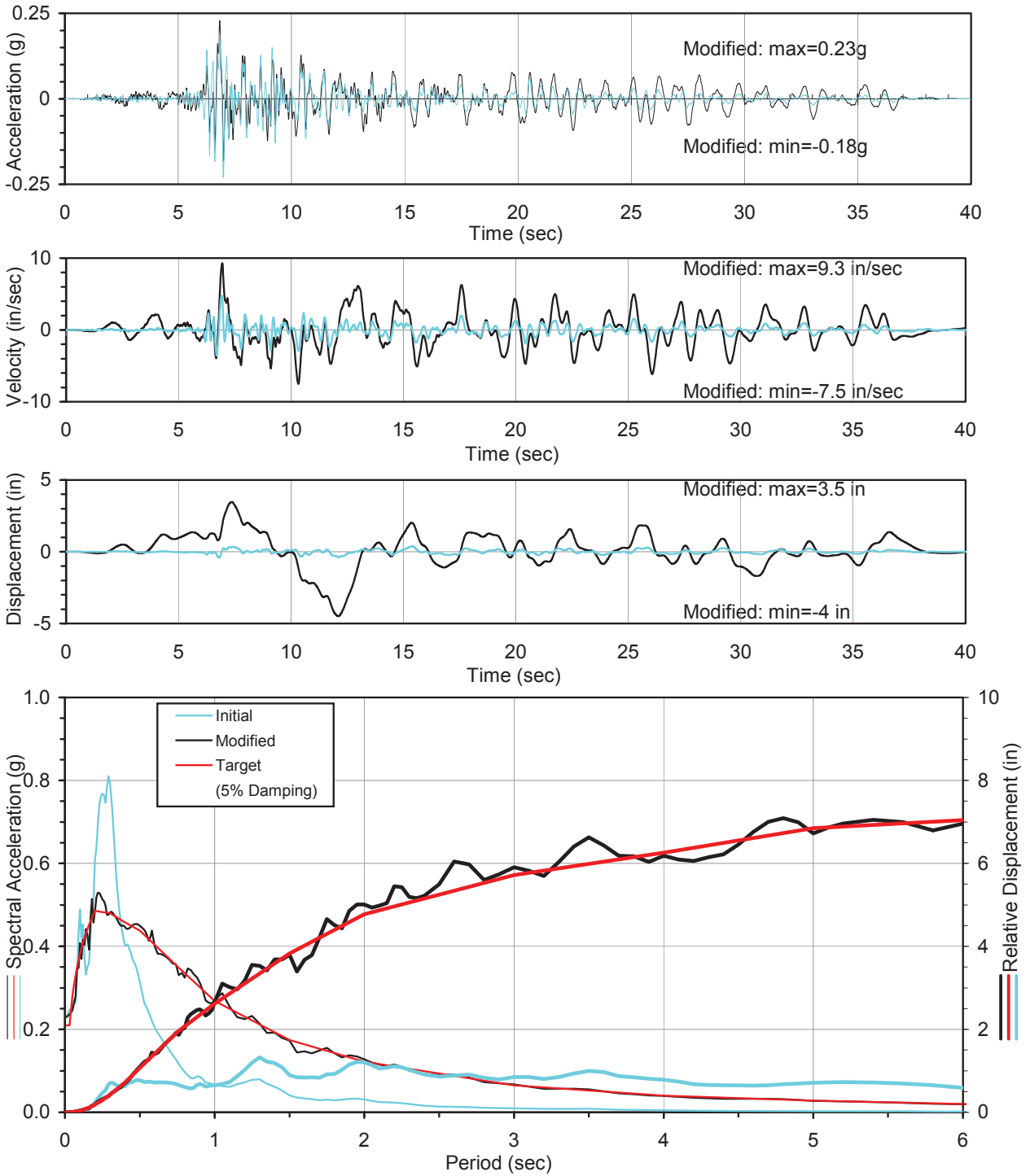


Figure D-24. Design Time Histories Compatible to OLE Design Spectra, Set 3  
(a) FN Component



**Figure D-24. Design Time Histories Compatible to OLE Design Spectra, Set 3  
 (b) FP Component**

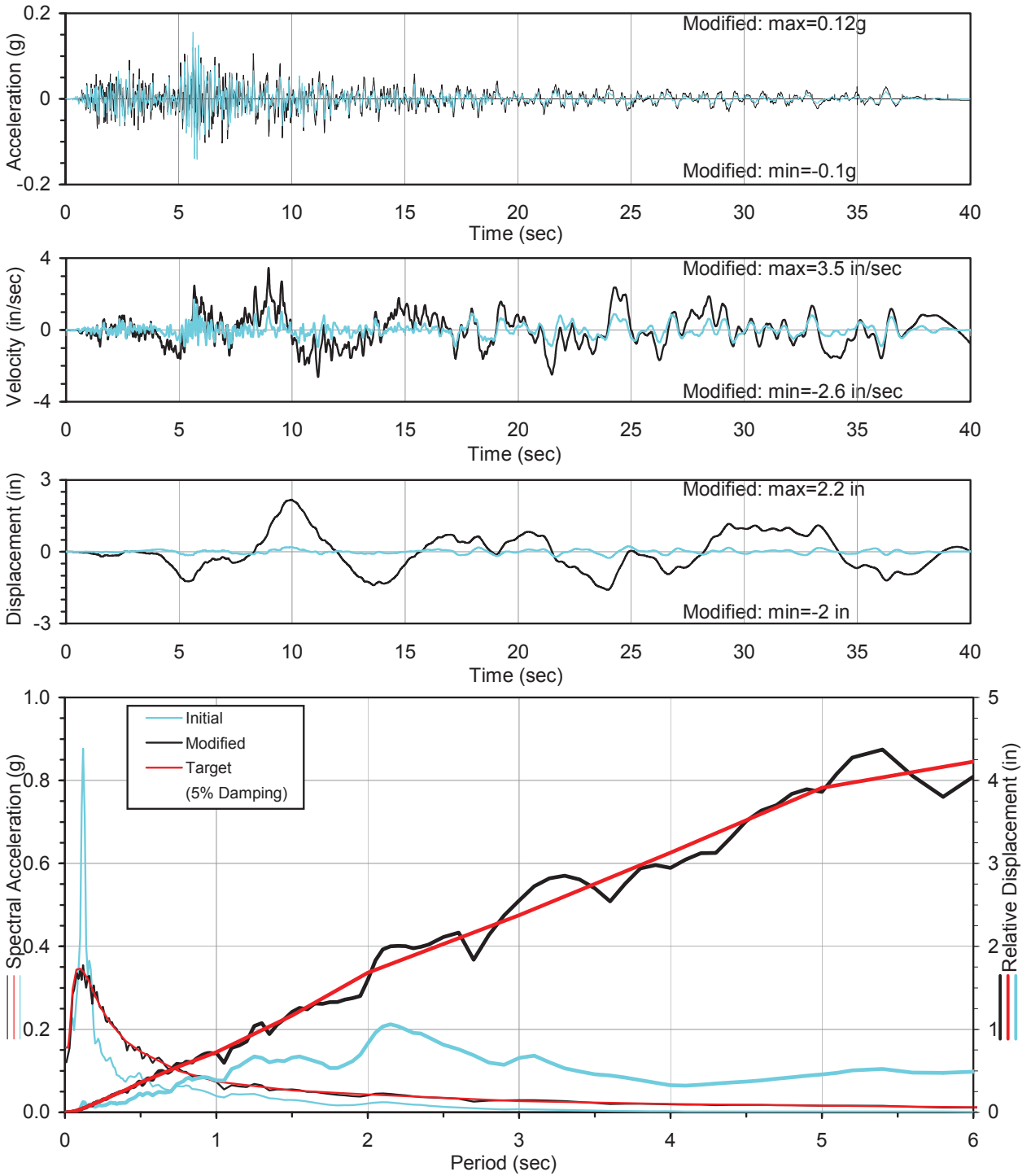


Figure D-24. Design Time Histories Compatible to OLE Design Spectra, Set 3  
(c) FV Component



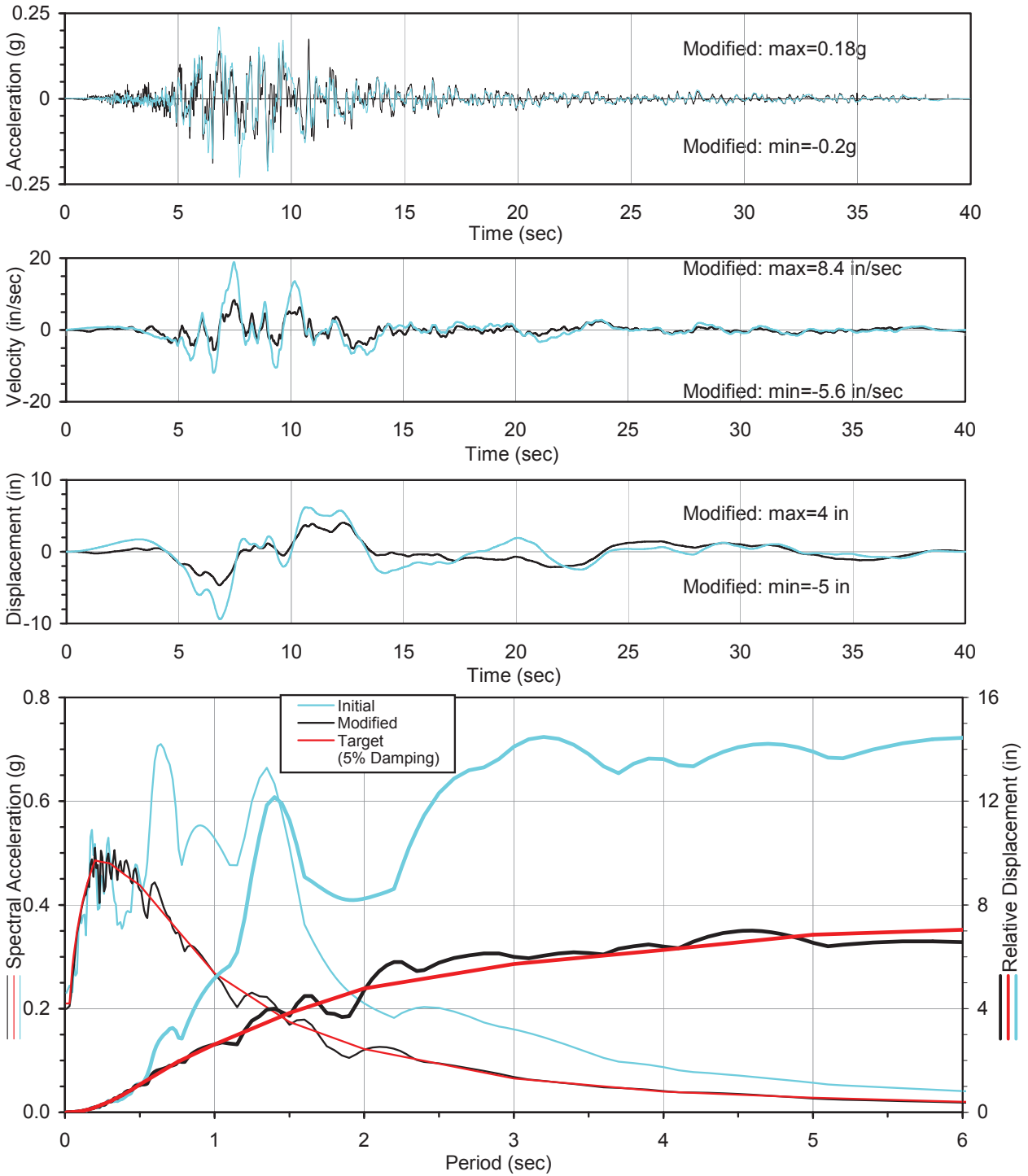


Figure D-25. Design Time Histories Compatible to OLE Design Spectra, Set 4  
(a) FN Component

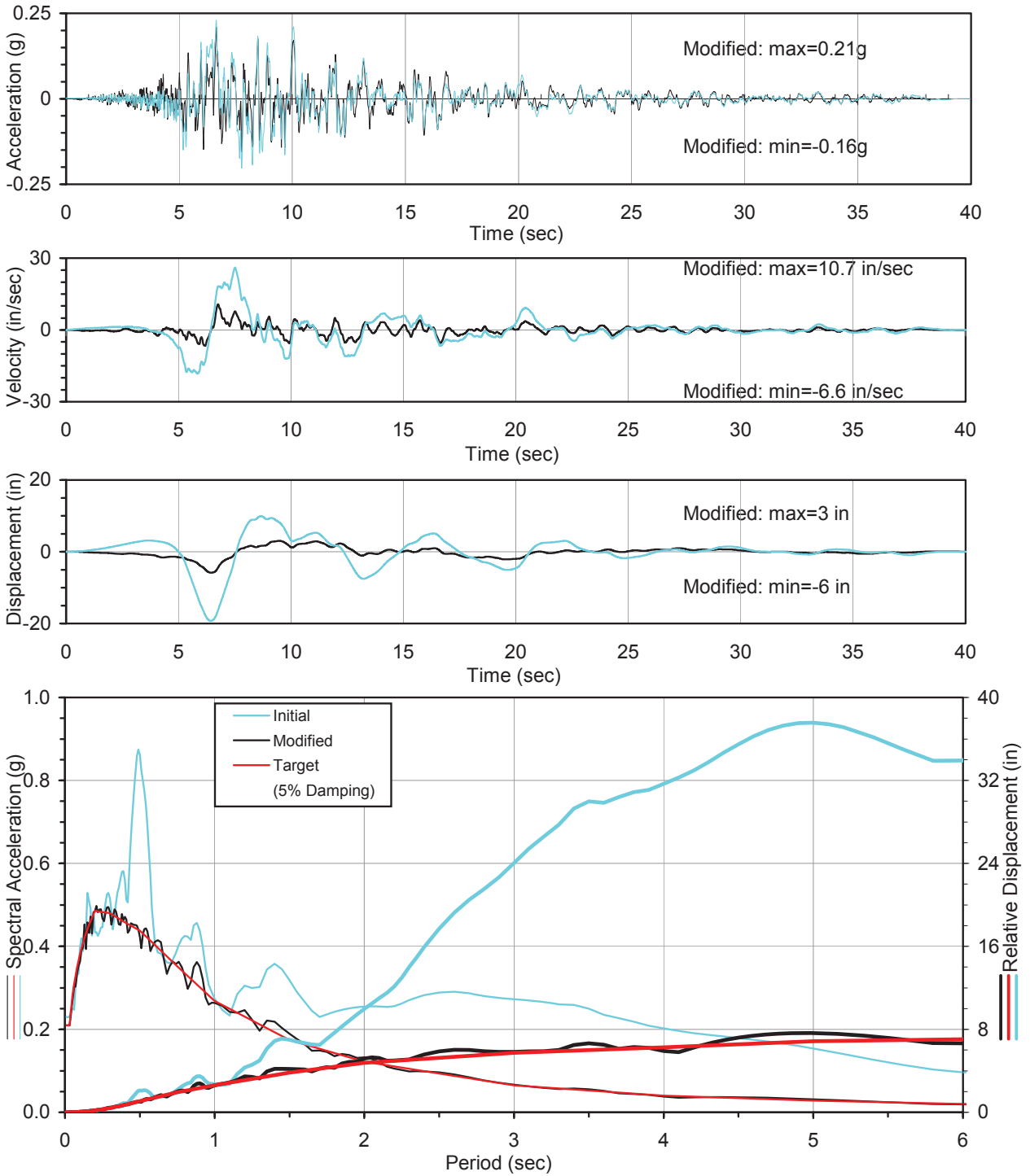


Figure D-25. Design Time Histories Compatible to OLE Design Spectra, Set 4  
(b) FP Component

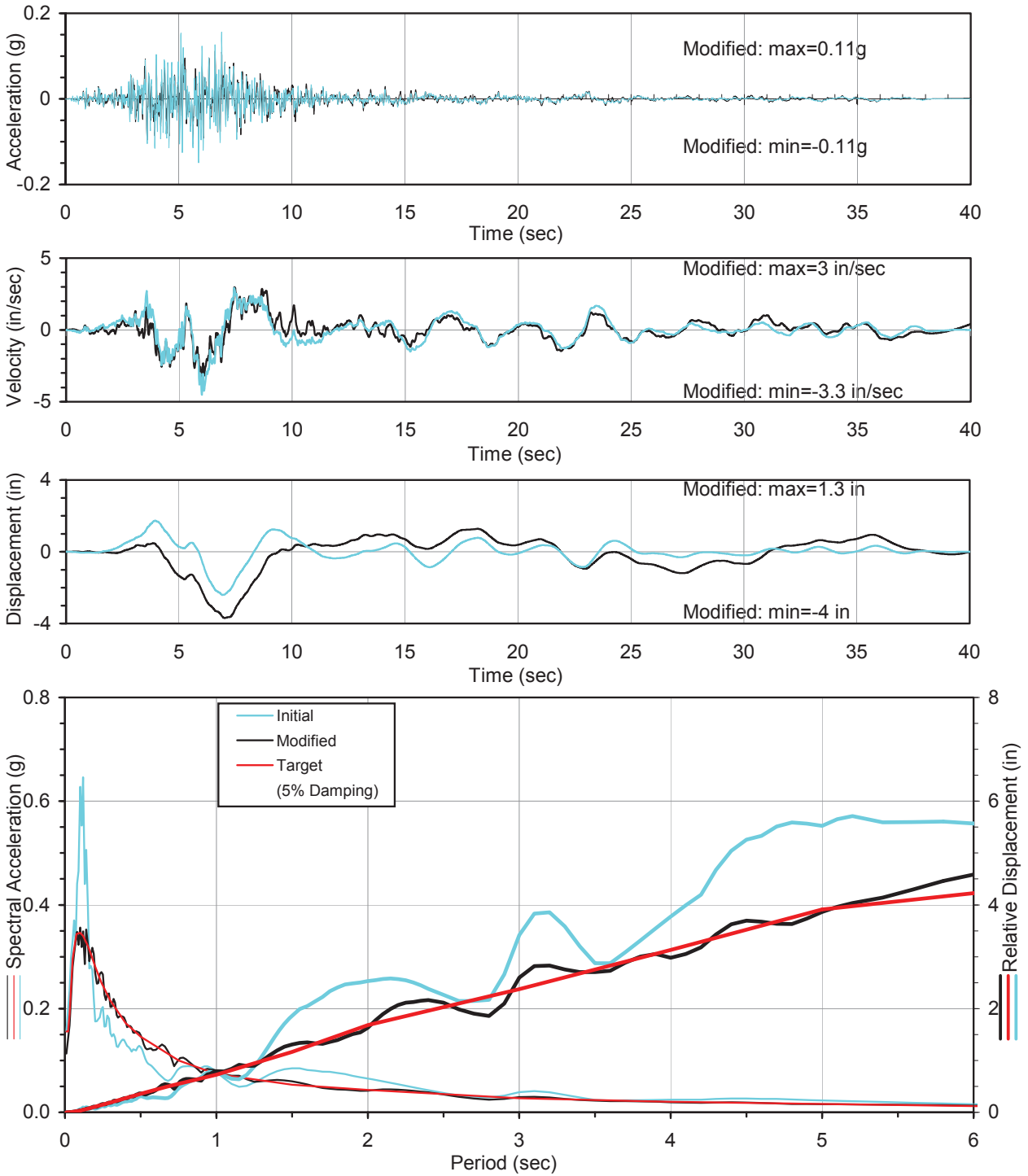


Figure D-25. Design Time Histories Compatible to OLE Design Spectra, Set 4  
 (c) FV Component

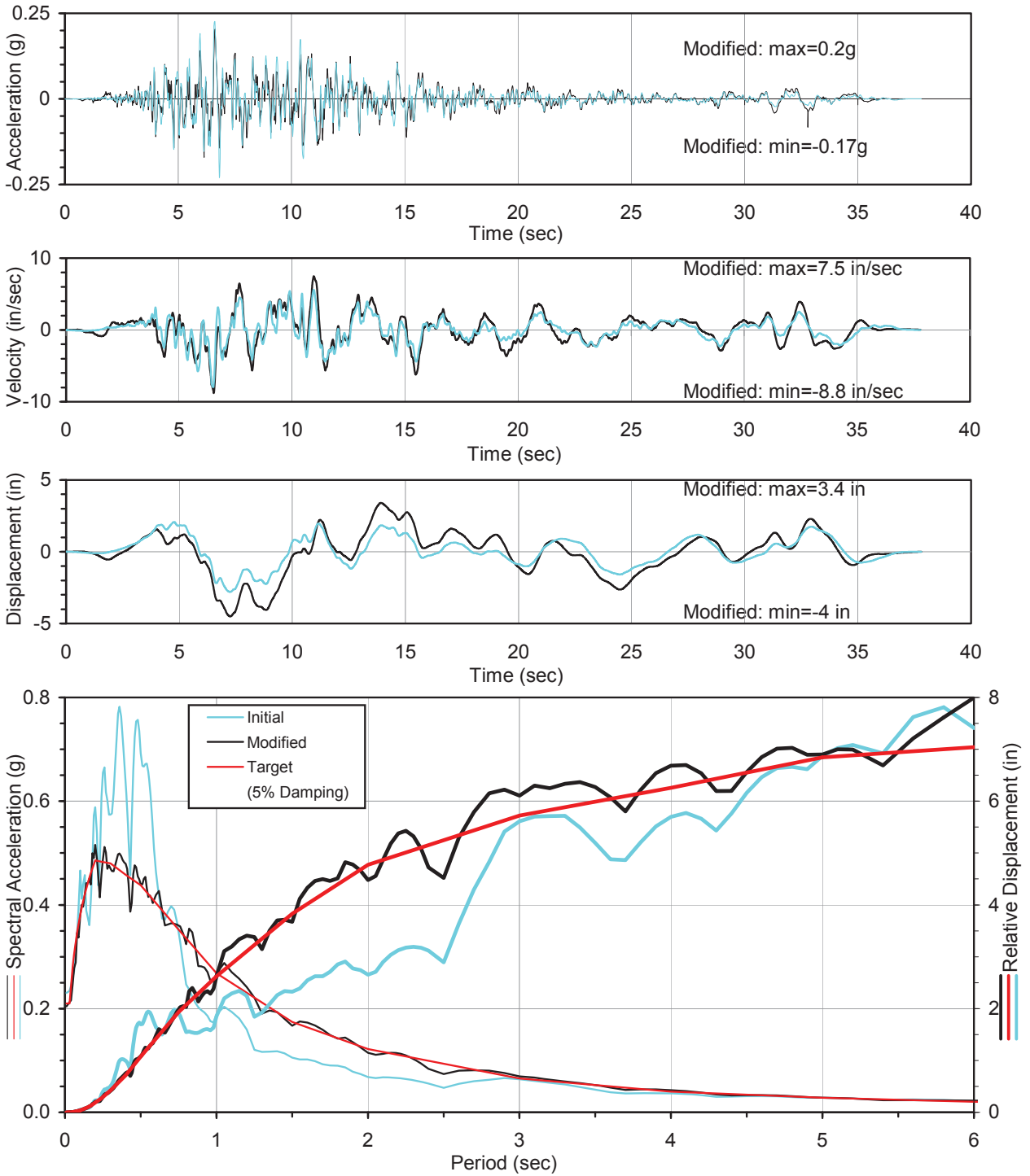


Figure D-26. Design Time Histories Compatible to OLE Design Spectra, Set 5  
(a) FN Component

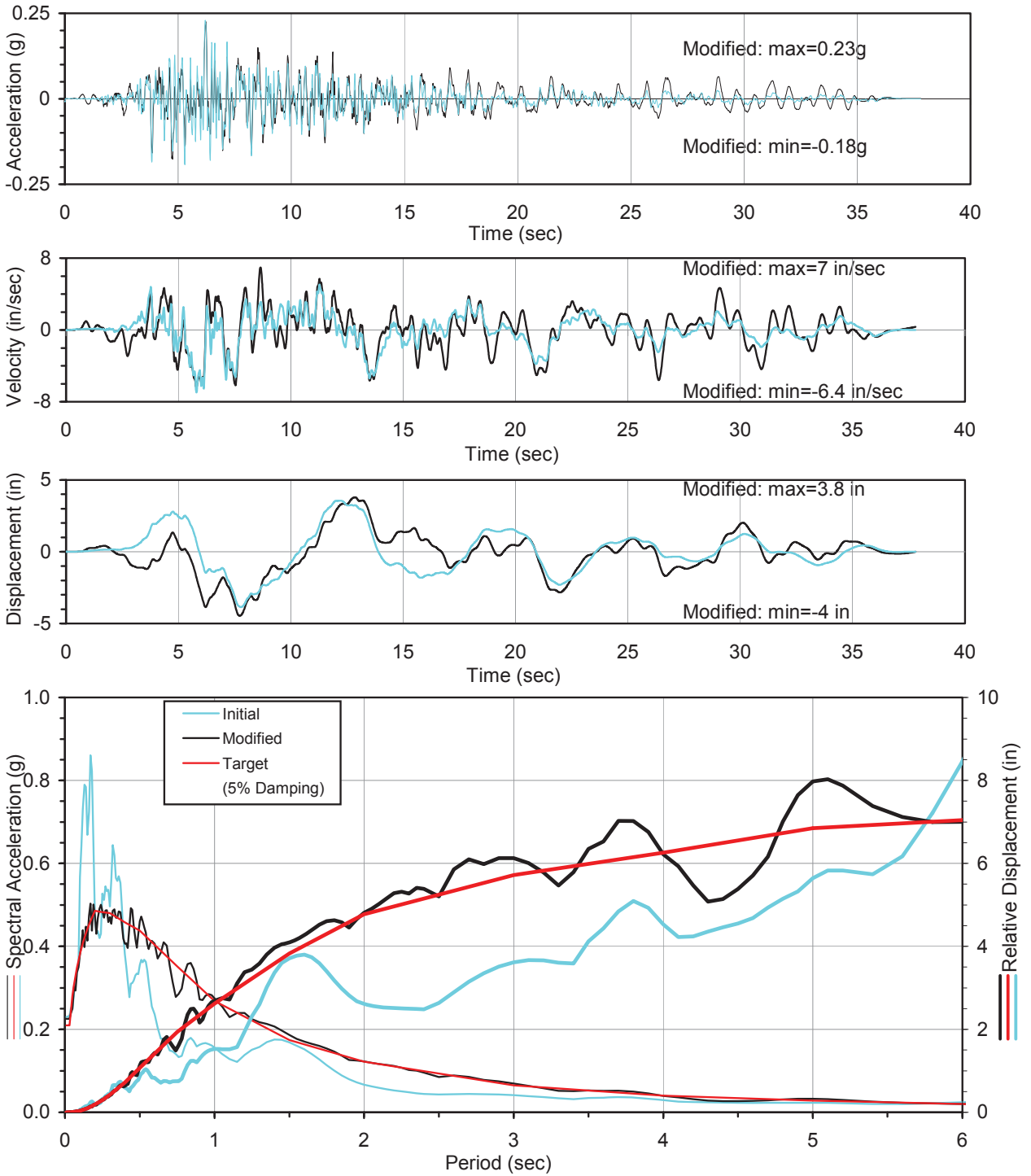


Figure D-26. Design Time Histories Compatible to OLE Design Spectra, Set 5  
(b) FP Component

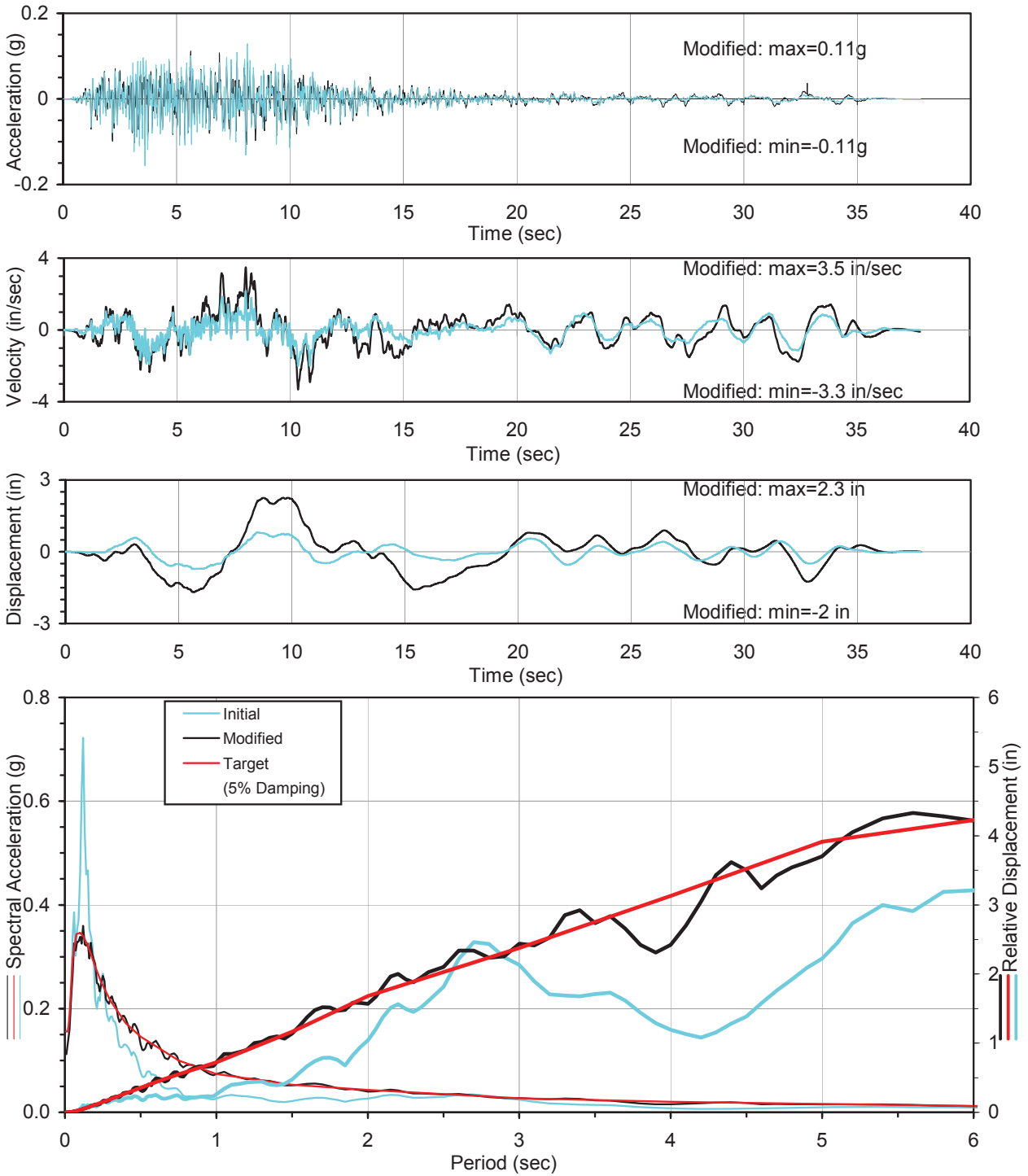


Figure D-26. Design Time Histories Compatible to OLE Design Spectra, Set 5  
(c) FV Component

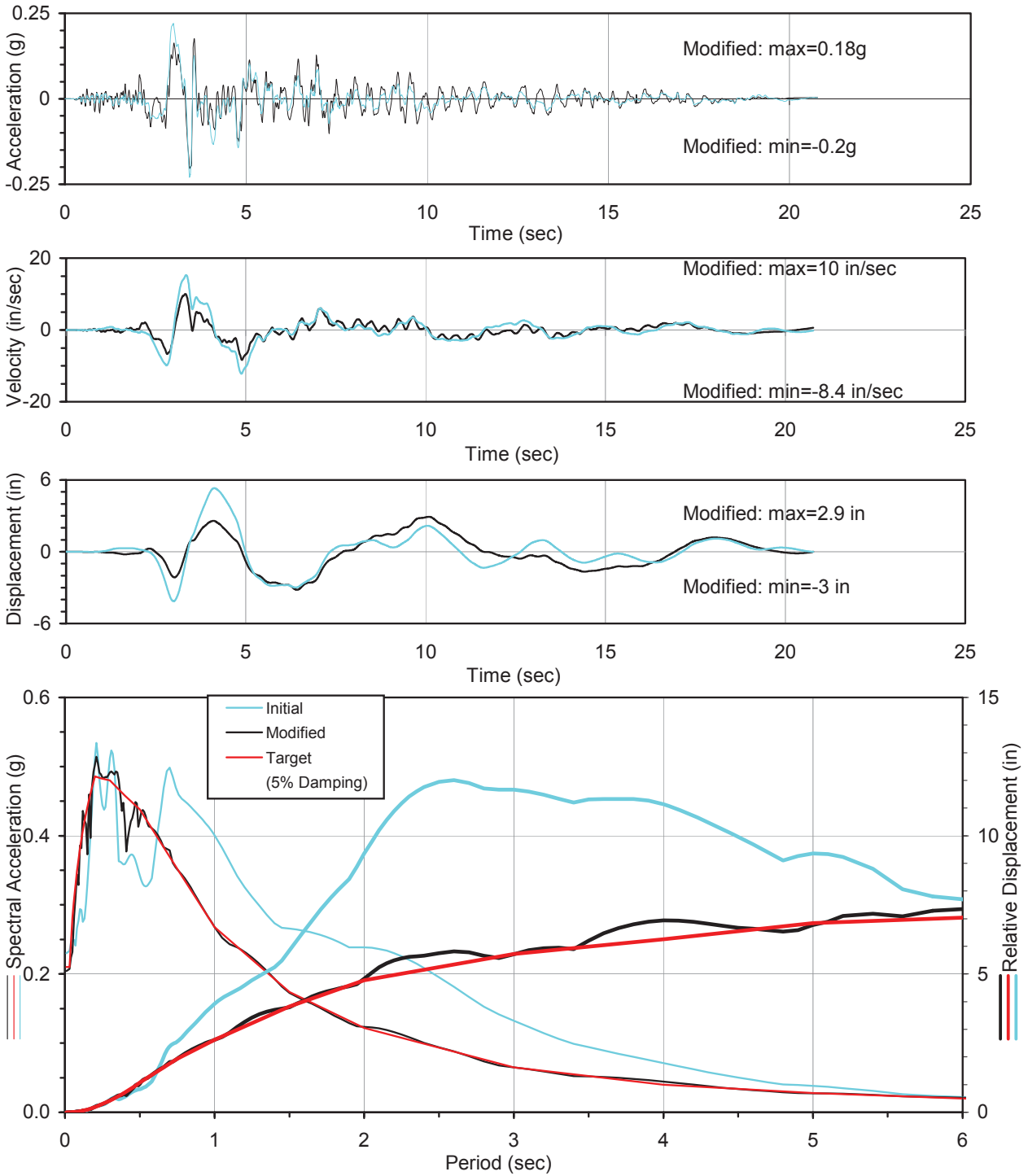


Figure D-27. Design Time Histories Compatible to OLE Design Spectra, Set 6  
(a) FN Component

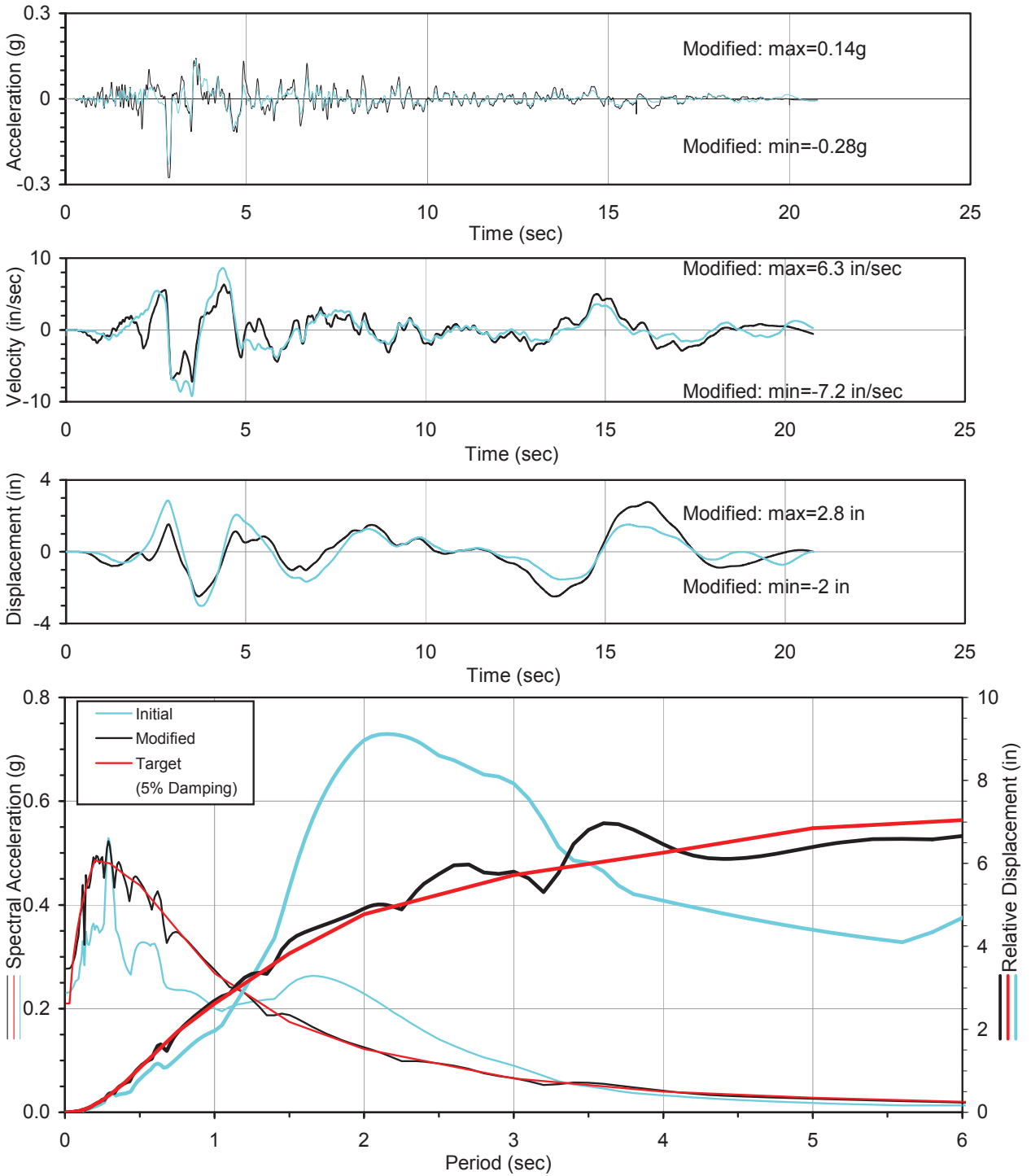


Figure D-27. Design Time Histories Compatible to OLE Design Spectra, Set 6  
(b) FP Component



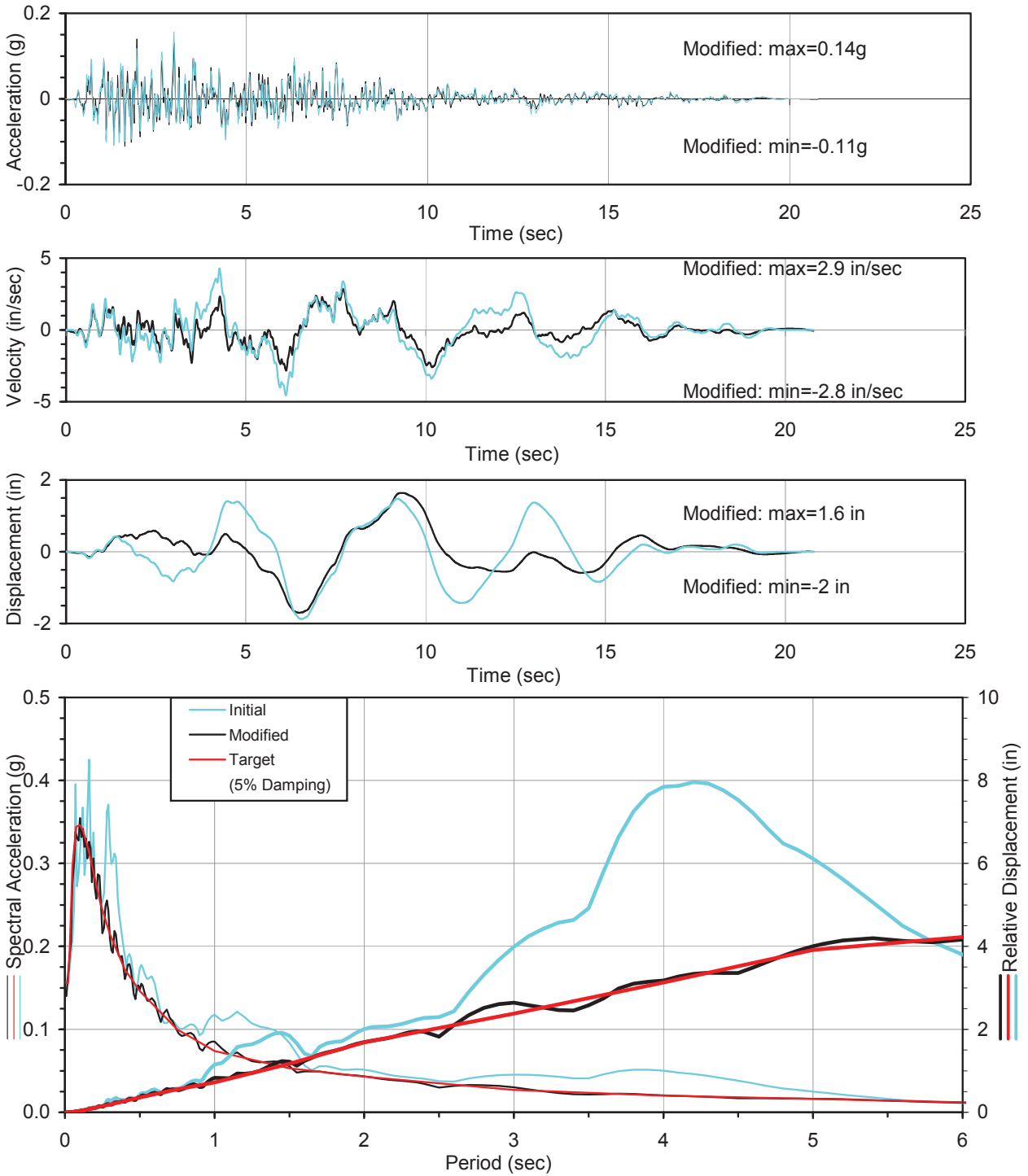


Figure D-27. Design Time Histories Compatible to OLE Design Spectra, Set 6  
 (c) FV Component

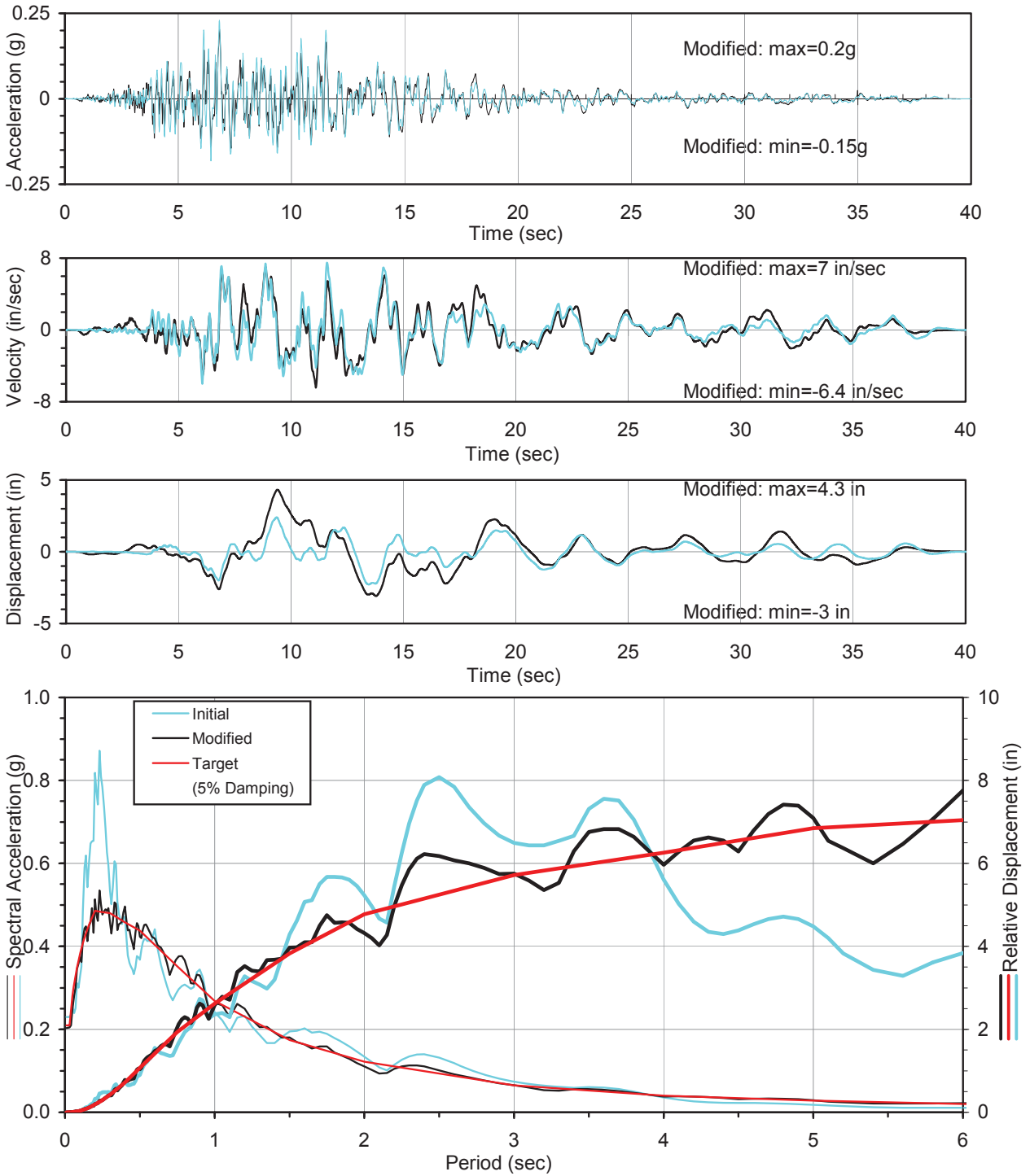


Figure D-28. Design Time Histories Compatible to OLE Design Spectra, Set 7  
(a) FN Component

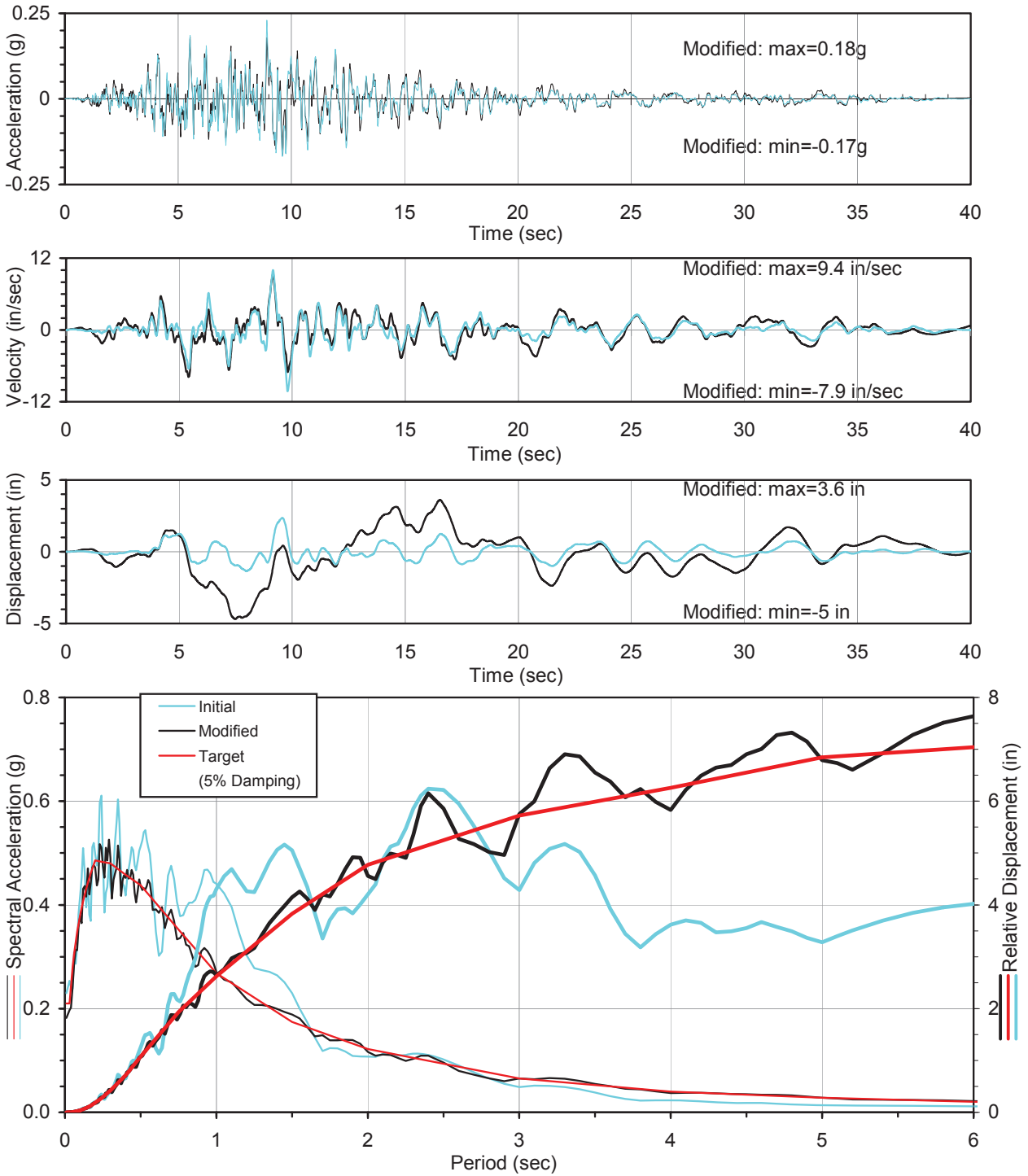


Figure D-28. Design Time Histories Compatible to OLE Design Spectra, Set 7  
(b) FP Component

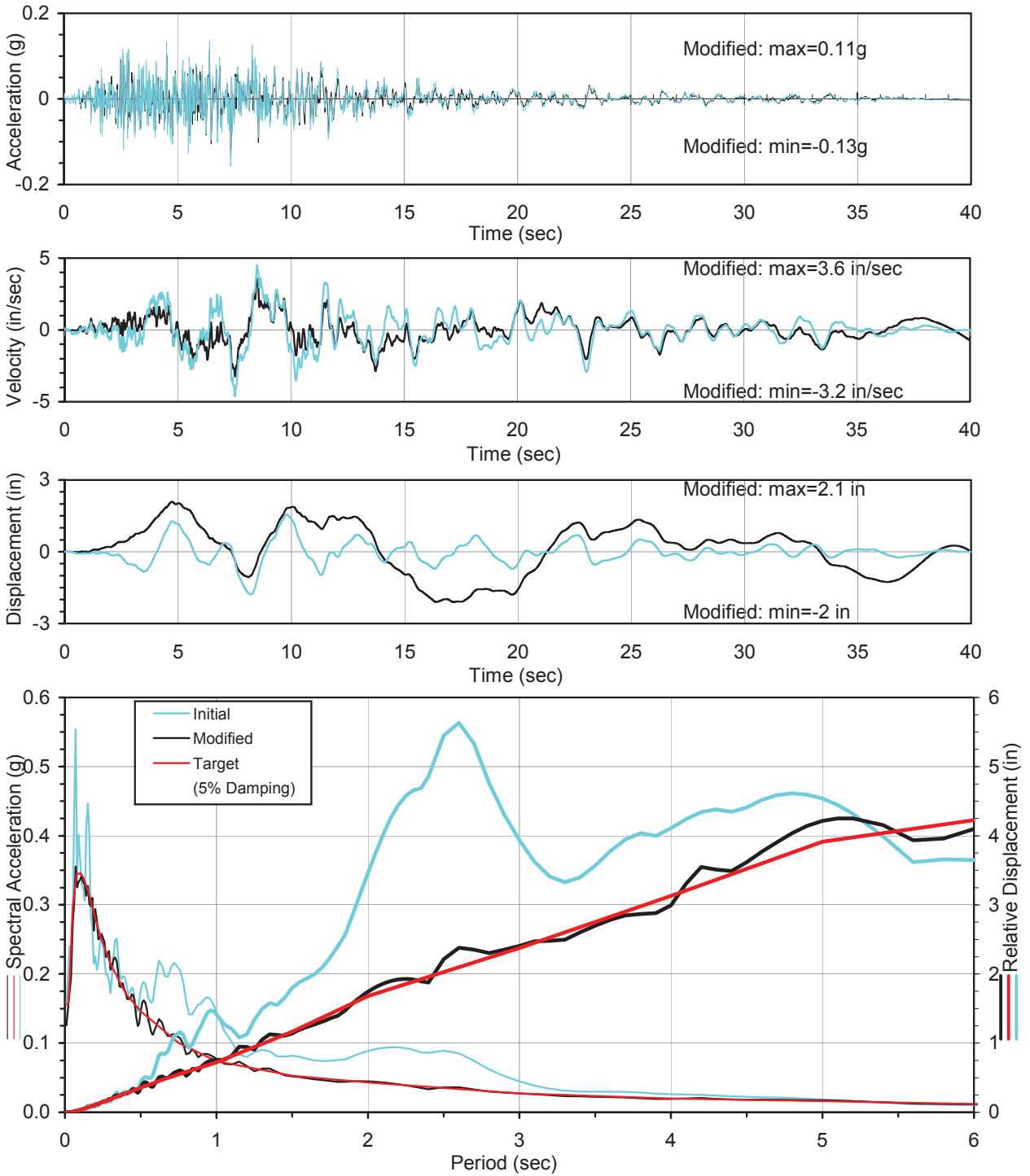


Figure D-28. Design Time Histories Compatible to OLE Design Spectra, Set 7  
(c) FV Component

# **APPENDIX E**

## **Newmark Displacement Estimates**

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# APPENDIX E NEWMARK DISPLACEMENT ESTIMATES

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## APPENDIX E

# NEWMARK DISPLACEMENT ESTIMATES

### E.1 NEWMARK DISPLACEMENT ESTIMATES FOR CLE

Simplified Newmark sliding block analysis was performed to develop charts of estimated lateral ground displacements as a function of yield acceleration for the CLE (475-year return period) spectral-matched firm-ground motions.

The seven spectral-matched firm-ground horizontal time histories (i.e., horizontal fault-normal and fault-parallel components, a total of 14 time histories) for the CLE events from Appendix D.1 were used in the analyses. The analyses also included all reversed time histories with ground motion acting in the opposite direction. Ground displacement was calculated based on constant yield acceleration levels of 0.03, 0.05, 0.075, 0.1, 0.15, 0.2, 0.25, and 0.3g and down-slope sliding by double-integrating each of the modified time histories. A total of 224 analyses (7 records x 2 components x 2 directions x 8 yield accelerations) were performed.

Figure E-1 shows the resulting lateral displacement versus yield acceleration curves for all 28 (7 records x 2 components x 2 directions) CLE time histories, as well as upper- and lower-bound envelopes of all curves. Since more than seven time histories were used in these evaluations, the average curve is judged to be appropriate for screening evaluations. The use of the average values has been recognized as an acceptable practice when seven or more time histories are considered in the analysis (Bommer et al., 2003; CBC, 2001; IBC, 2000).

Figure E-2 shows the upper- and lower-bound envelopes displacement curves and the recommended design curve. The recommended values are given in Table E-1. The recommended curve may be used as a conservative screening tool to estimate lateral slope displacements during a CLE event.

### E.2 NEWMARK DISPLACEMENT ESTIMATES FOR OLE

Simplified Newmark analysis was performed for the OLE spectral-matched firm-ground motions from Appendix D.2 to develop charts of estimated lateral ground displacements as a function of yield acceleration. The same procedure involving a total of 224 analyses as described in Section E.1 was used.

Figure E-3 shows the displacement versus yield acceleration curves for all 28 OLE time histories and the upper- and lower-bound envelopes of all curves. The upper-bound envelope shown is recommended for design and may be used as a conservative screening tool to determine to estimate lateral slope displacements during a OLE event. The recommended values (rounded to the nearest half inch) are given in Table E-1.

**Table E-1. Recommended Newmark Displacement Estimates for Site Screening**

<b>Yield Acceleration (g)</b>	<b>Slope Displacement due to OLE (in)</b>	<b>Slope Displacement due to CLE (in)</b>
0.03	10.0	58
0.05	4.0	32
0.075	1.5	18
0.10	1.0	11
0.15	0.5	4.0
0.20	< 0.5	2.0
0.25	< 0.5	1.0
0.30	< 0.5	< 0.5



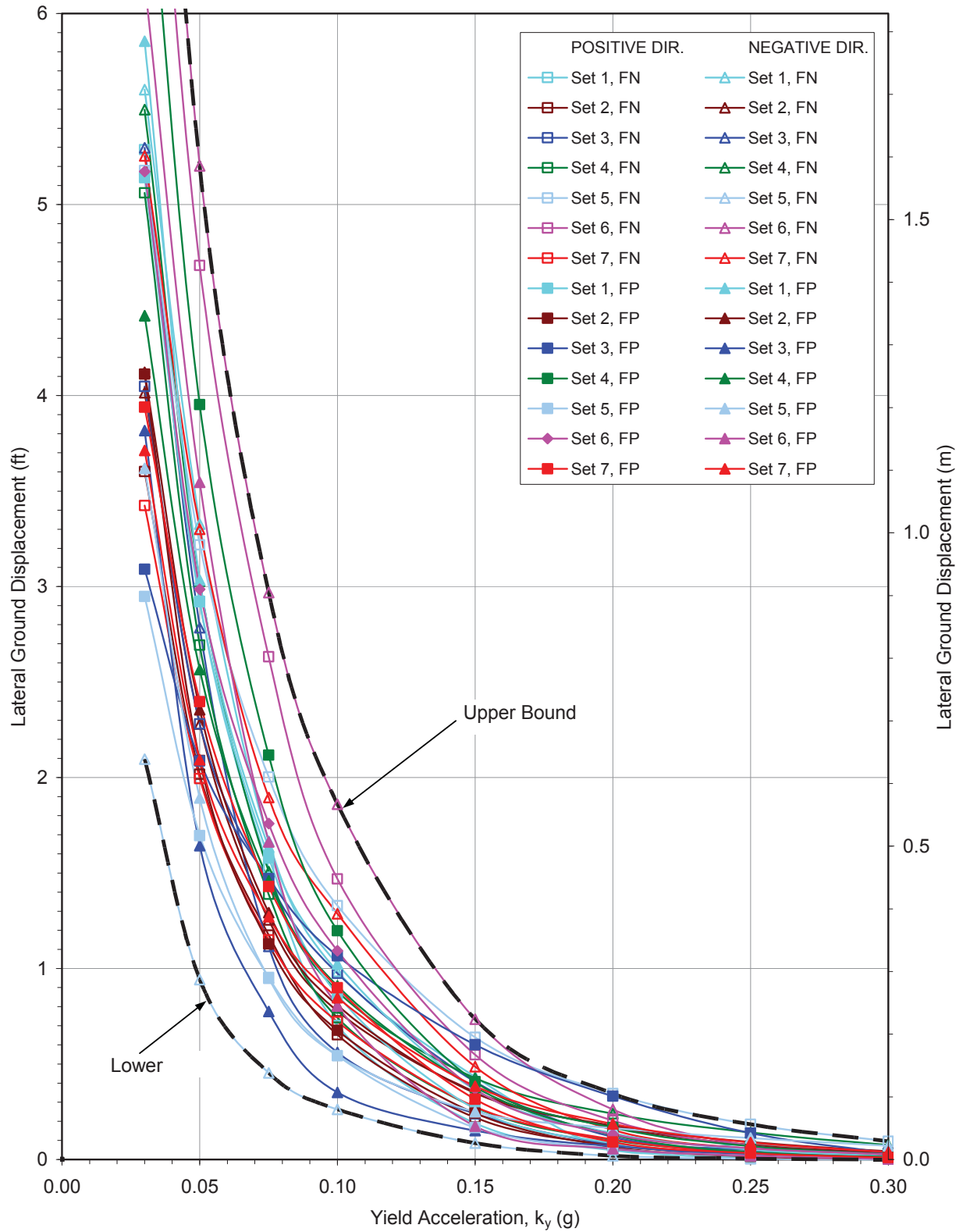
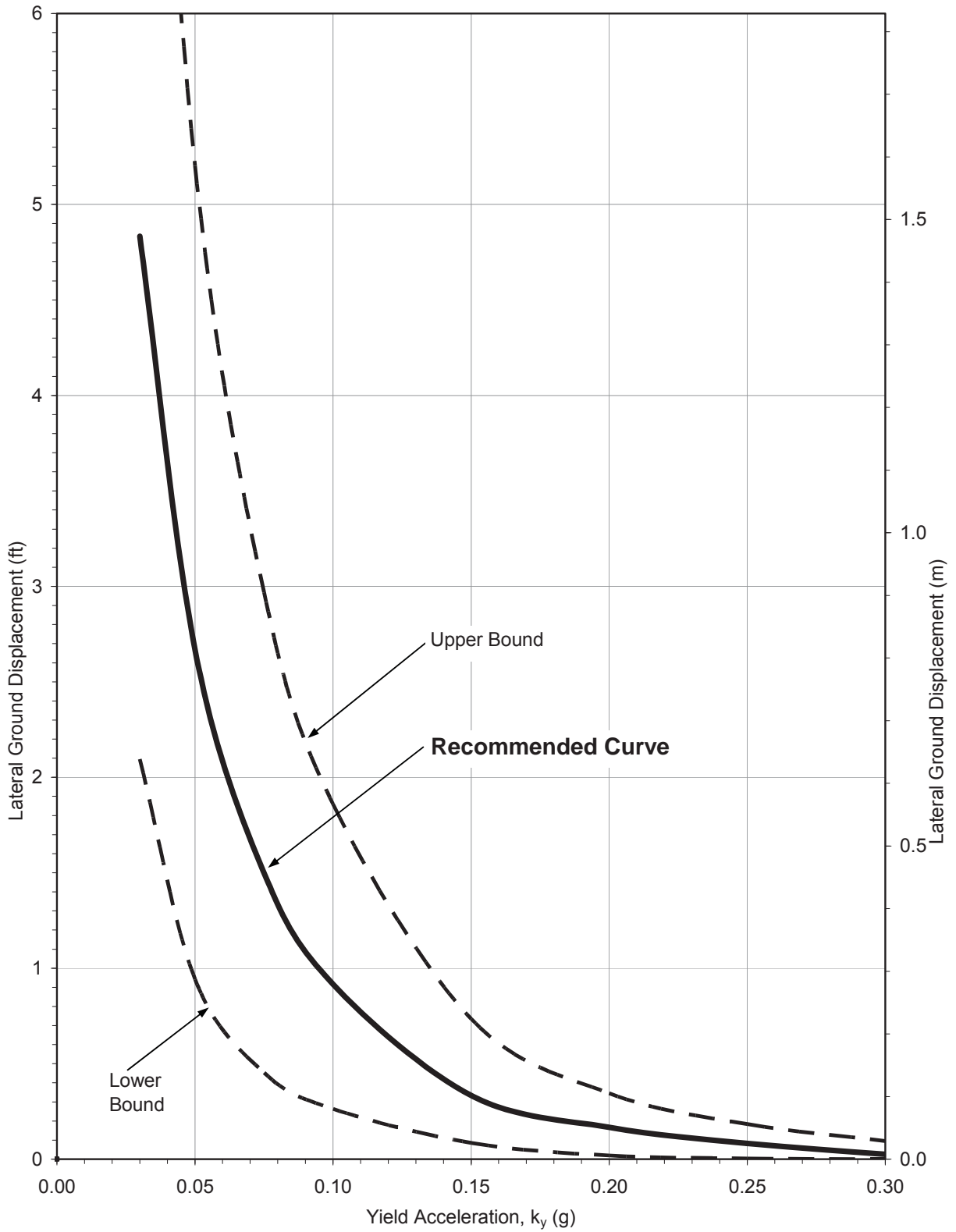
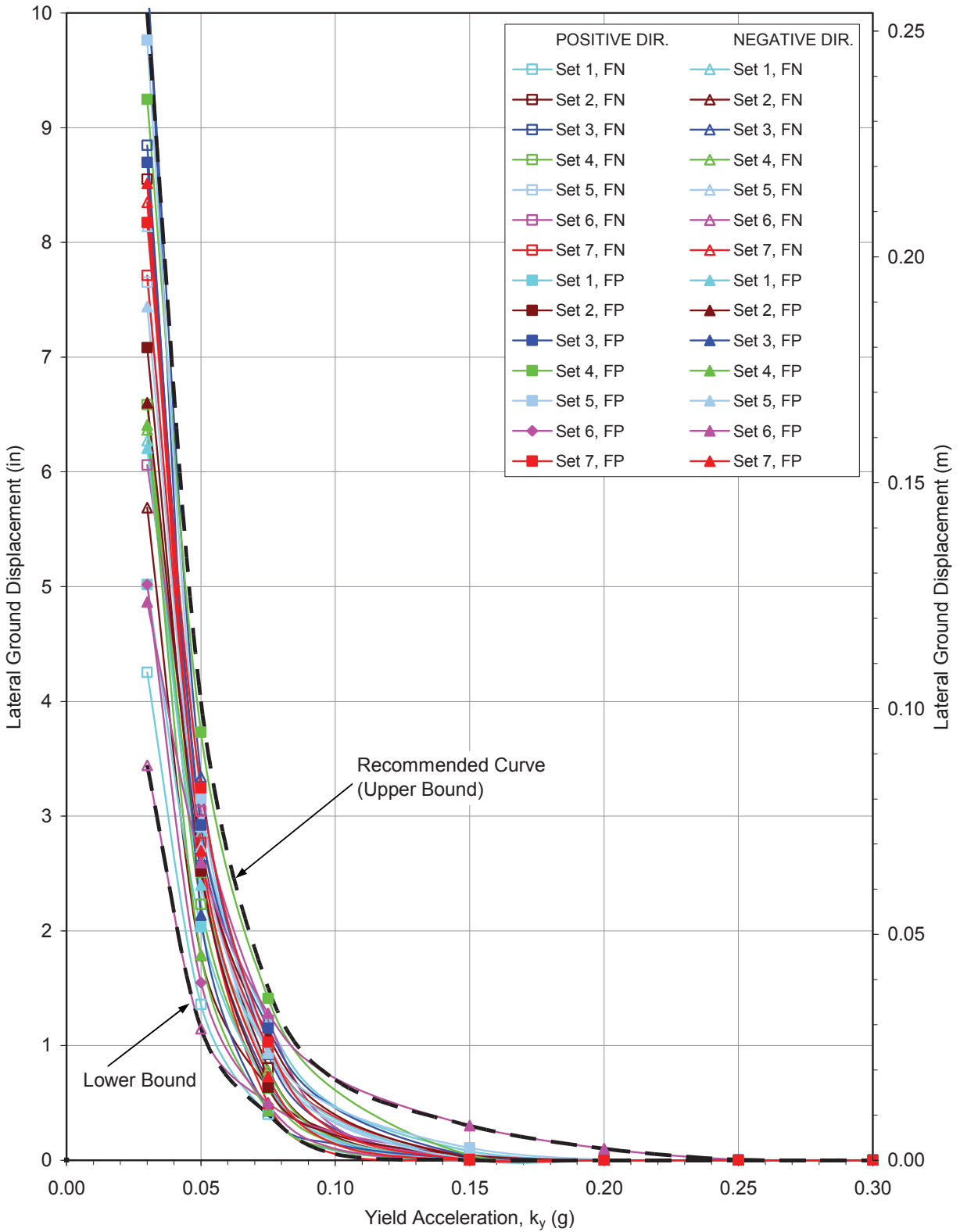


Figure E-1. Results from Newmark Displacement Analyses for 475-yr Return Period (CLE)



**Figure E-2. Range of Newmark Displacement Estimates and Recommended Screening Curve for Site Screening, 475-yr Return Period (CLE) Event**



**Figure E-3. Results of Newmark Displacement Estimates and Recommended Curve for Site Screening, 72-yr Return Period (OLE) Event**

# **APPENDIX F**

## **ELECTRONIC FILES**

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## APPENDIX F ELECTRONIC FILES

A Compact Disk is attached containing electronic files of this entire report and the time histories and spectra provided in Appendix D. Table F-1 tabulates all files contained on the disk and provides the file format and descriptions of the file content. Table F-2 lists and describes the contents of the recommended firm-ground and design spectra presented Section 6. Table F-3 provides the contents of the ground motion files presented in Appendix D.

**Table F-1. Content of Compact Disk**

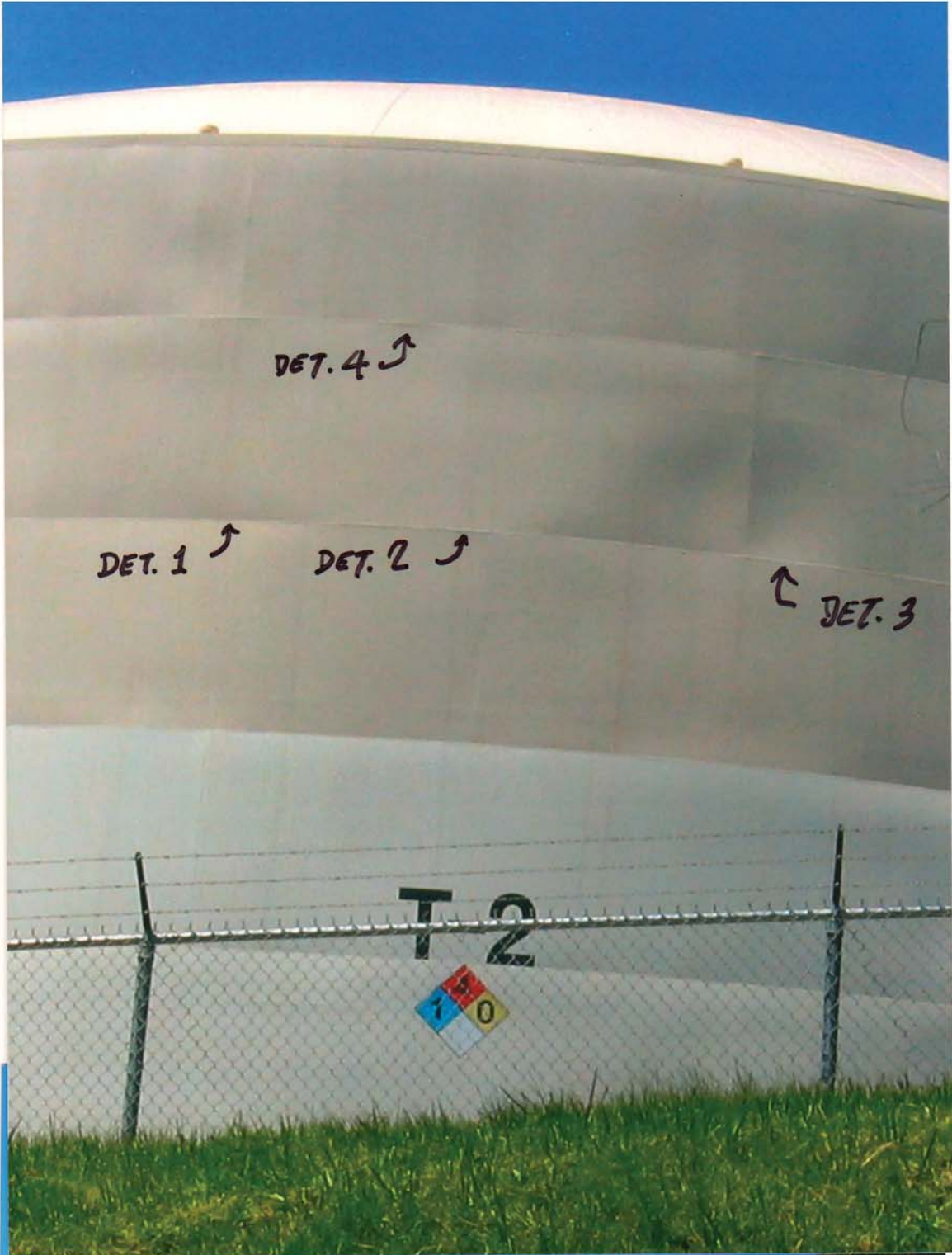
Directory	File name	File Type	Content
(Root)	Readme.doc	Microsoft Word 2002	Description of files
Report	Report.pdf	Adobe Acrobat 6.0	This Report (main text and appendices)
	Binder_Cover.pdf	Adobe Acrobat 6.0	Binder cover
Motion_Files	Spectra.xls	Microsoft Excel 2002	Recommended spectra (see Table F-2)
	FirmGroundCLE.xls	Microsoft Excel 2002	Firm-ground time histories and spectra for CLE given in Appendix D.1 (see Table F-3)
	FirmGroundOLE.xls	Microsoft Excel 2002	Firm-ground time histories and spectra for OLE given in Appendix D.2 (see Table F-3)
	DesignCLE.xls	Microsoft Excel 2002	Firm-ground time histories and spectra for CLE given in Appendix D.3 (see Table F-3)
	DesignOLE.xls	Microsoft Excel 2002	Firm-ground time histories and spectra for OLE given in Appendix D.4 (see Table F-3)

**Table F-2. Content of Spectra File**

Workbook File Name	Worksheet Name	Content
Spectra.xls	Firm Ground CLE	Spectral acceleration values of firm-ground spectra for CLE for 5% damping (Table 6-2 in main text)
	Firm Ground OLE	Spectral acceleration values of firm-ground spectra for OLE for 5% damping (Table 6-1 in main text)
	Design CLE	Spectral acceleration values of design spectra for CLE for various damping values (Table 6-4 in main text)
	Design OLE	Spectral acceleration values of design spectra for OLE for various damping values (Table 6-3 in main text)

**Table F-3. Content of Ground Motion Files**

Workbook File Name	Worksheet Name	Content
FirmGroundCLE.xls	Set 1 - FN Through Set 7 - FN	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Normal component (Fig. D-1b,c through D-7b,c) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
	Set 1 - FP Through Set 7 - FP	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Parallel component (Fig. D-1b,c through D-7b,c) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
	Set 1 - FV Through Set 7 - FV	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for vertical component (Fig. D-1b,c through D-7b,c) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
FirmGroundOLE.xls	Set 1 - FN Through Set 7 - FN	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Normal component (Fig. D-8a through D-14a) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively
	Set 1 - FP Through Set 7 - FP	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Parallel component (Fig. D-8b through D-14b) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively
	Set 1 - FV Through Set 7 - FV	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for vertical component (Fig. D-8c through D-14c) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively
DesignCLE.xls	Set 1 - FN Through Set 7 - FN	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Normal component (Fig. D-15a through D-21a) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
	Set 1 - FP Through Set 7 - FP	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Parallel component (Fig. D-15b through D-21b) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
	Set 1 - FV Through Set 7 - FV	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for vertical component (Fig. D-15c through D-21c) for CLE Ground Motion Set 1 through 7 (see Table D.1) , respectively
DesignOLE.xls	Set 1 - FN Through Set 7 - FN	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Normal component (Fig. D-22a through D-28a) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively
	Set 1 - FP Through Set 7 - FP	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for Fault Parallel component (Fig. D-22b through D-28b) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively
	Set 1 - FV Through Set 7 - FV	Modified and target time histories and spectra of horizontal acceleration, velocity and pseudo relative displacement for vertical component (Fig. D-22c through D-28c) for OLE Ground Motion Set 1 through 7 (see Table D.2) , respectively





Connie Rutter  
879 Upland Ave.  
San Pedro, Ca. 90732

July 25, 2012

Dear Connie,

Enclosed Tank Photos showing worrismatic distortions, depressions and bulges.

A potential 9-11 (No. 2) is only 45 days away. An ordinary rifle shot (Not even Armor Piercing) aimed at 40 year old highly stressed Weld Joints may produce "The Epic Catastrophe" the extremists dream of. How can any terrorist resist "this invitation". So obvious....Homeland Security surely must know this. I feel that Rancho LP Tanks should be shut down Immediately. I live 0.9 miles away. On 9-11 my family will be in another city.

Questions:

Should a Welding or Structural Engineer be consulted r.e. current condition Of tank welds r.e. warp, misalignments, load bearing distortions producing new and hidden stresses?

If tank capacity was reduced by 75% would the 3 mile danger zone be reduced, and allow the facility to still function?

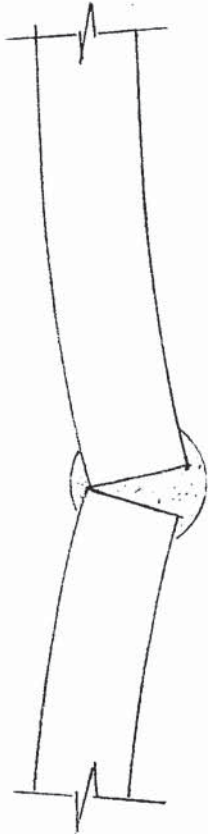
As an independent Contractor for 25 years serving petroleum Engineers in the design of pipelines and off shore platforms, many times I was Asked, " Why would you put your family at risk living so close to LP tanks "? (resident of S,P. since March 10, 1933 Earthquake). Every Petrol. Engineer I've met knows this.

Hoping that these "Man on the street observations" will aid and encourage you to continue your fine efforts to relocate these tanks, I am,

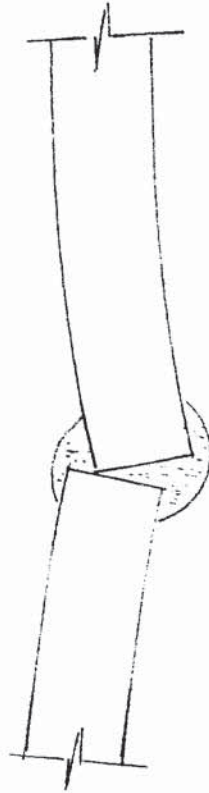
Jack and Rita Brown (neighbors of Jodie)  
E mail: jpb1933@sbcglobal.net

STEEL TANK WELDS

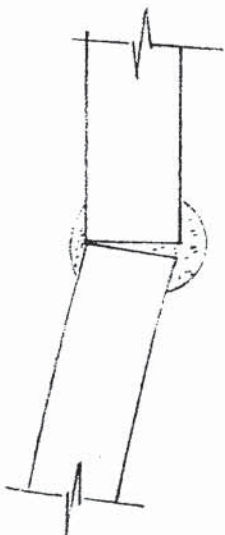
LOAD FROM  
PLATES ABOVE



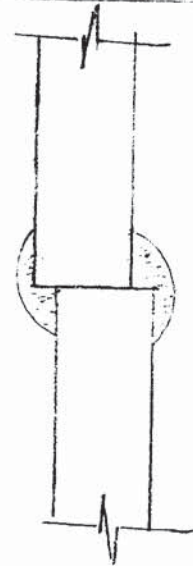
DETAIL 1



DETAIL 2



DETAIL 3



DETAIL 4

NOT TO SCALE

December 30, 2012

Erin Strelch, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 23 2013

ENVIRONMENTAL  
UNIT

Re: Ponte Vista Project, 26900 S. Western Ave., San Pedro

Dear Erin Strelch,

Rolling Hills Riviera Homeowners Association opposes the current Ponte Vista Plan for a variety of reasons. We strongly recommend the planning department maintain the current R-1 zoning and reject the current plan.

The Ponte Vista property is currently unkempt vacant homes which is the responsibility of the owner to maintain. Local homeowners and business owners have had to deal with the blight for years. It is unreasonable to rezone the property "because something would be better than what is there now". If the plan was always to tear down the current homes and build new ones, then those homes should have been torn down years ago and the empty lot maintained. The lack of maintenance or solid fencing was an intentional decision to create an eyesore so the public would be more willing to accept anything over what is there now. Do not reward this type of decision by approving these plans just to get rid of an eyesore.

B167-1

The developer purchase the property knowing the zoning was R-1. The lenders approved the loans based on the knowledge the property was zoned R-1. There is no reason other than the developer's profit margin for a zoning change.

B167-2

Los Angeles for a number of years has approved more condos, apartments and townhomes than single family homes by a wide margin. There are fewer single family homes available and that is what should be built on that site and the R-1 zoning should be maintained.

The EIR's for the Sea Port and Casa Verde condos next to Ponte Vista were based on Ponte Vista being vacant and not using resources or impacting traffic and therefore those developers were able to build the maximum amount of units on the property. It is unfair and unreasonable to approve those projects based on Ponte Vista being vacant and then allows the Ponte Vista EIR to make statements that impacts are negative or less than significant.

B167-3

There are serious discrepancies in the EIR, for example, the statement "The Project Site was previously developed. Therefore, in large part, reuse of the property does not raise potential impacts to natural resources." How is it possible that a property with single family homes that has been vacant since 1999 can use the same amount of water, electricity, gas and sewer facilities as 1,135 occupied condo units? It can't - therefore it does impact the natural resources.

B167-4

Why are residents told by the Los Angeles Sanitation District that the sewer system is at maximum capacity and the \$740 million dollar Clearwater Project is needed and must be funded with taxpayer money when this EIR states there is plenty of capacity to handle an additional 1,135 units at Ponte Vista?

B167-5

An alarming term in the EIR is the word "approximately" instead of using the term "minimum" to describe sizes. There should be a minimum of 20 ft. setback from Western Avenue with a minimum number of trees, shrubs and plants. There should be minimum sidewalk and street widths that match the surrounding area.

B167-6

The developers claims there is a need for housing is incorrect, there is an over abundance of housing available for purchase or for rent in a wide variety of sizes and prices. This trend is not projected to change for a significant period of time. Adding more homes than the current R-1 zoning is unnecessary and will drive down area home prices even further. This will also cause a decrease in home values and property taxes collected for the entire area. This will hurt the local economy.

B167-7

According to the current Ponte Vista Plan, 35% of the units will be rental units. This is not in keeping with the surrounding area. This number of rental units should be denied.

The developer's claim that Ponte Vista is "Designed with the community", is incorrect otherwise they would have developed an R-1 community like the community has been requesting for years. "Policy 1-1.5 - Maintain at least 67% of designated residential lands for single family uses." However, the current Ponte Vista plan has less than 13% as single family homes. A condo or townhouse is not, in real estate terms, a single family house.

B167-8

We hope the planning department does the right thing and denies a zoning change and denies this plan. Our community will be negatively impacted by the lengthy construction time, the number of units allowed, the negative impact on traffic and utilities, the poor choice of building styles and the setbacks from Western Avenue that are too small.

Sincerely,

Jeanne Lacombe  
President, Rolling Hills Riviera Homeowners Association  
P.O. Box 6164  
San Pedro, CA 90734

RHRHA represents volunteer members of 721 homes in the Rancho Palos Verdes area off of Western Avenue between Green Hills Cemetery and Toscanini Drive. Our homes are directly across the street from Ponte Vista.

RHR-HA  
P.O. Box 6164  
San Pedro, CA 90734

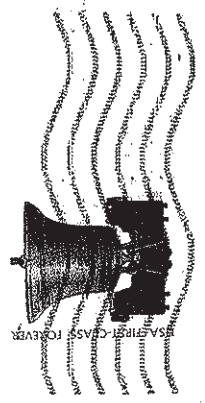
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JAN 23 2013

ENVIRONMENTAL  
UNIT

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03 JAN 2013 10:11:11



Erin Strellich, Planning Assistant  
Los Angeles Dept of City Planning  
200 N. Spring Street Room 750  
Los Angeles, CA 90012

90012324500



2004 Velez Drive  
Rancho Palos Verdes, CA 90275  
January 4, 2013

Erin Strellich  
Environmental Review Section  
DEPARTMENT OF CITY PLANNING  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 23 2013

Re: Ponte Vista DEIR  
ENV-2005-4516-EIR

ENVIRONMENTAL  
UNIT

Dear Ms. Strellich:

I write to you about the draft Environmental Impact Report ("DEIR) which the group that seeks to develop Ponte Vista recently submitted to your department. I first learned about this report just before the Holiday Season and am concerned that the residents who may be impacted by this project are being given so little opportunity to respond to it. Accordingly, I would first ask that the city extend the time for residents to submit their comments about the project's DEIR.

Although there may well be other issues which would cause me concern if I had time to examine the DEIR in any detail, there is one which did catch my eye. It is the report's treatment of open space.

I have owned a home in the Eastview area of Rancho Palos Verdes since 1982 and have enjoyed hiking all around the area for many of those years – sometimes with groups such as the Sierra Club but more often just with friends. We continually comment among ourselves about how little open space exists in San Pedro. I was not surprised to learn that the newly drafted San Pedro Community Plan states that only about one per cent of the city's area remains open.

What I was surprised to learn is that 15 acres of the site which Ponte Vista proposes to develop are zoned as open space. Until recently, I was under the impression that the entire 60-plus acre tract is zoned R-1. That Bisno Development would purchase a tract designated R-1, with the plan to have it re-zoned for high density housing, seemed remarkably cynical to me and many others I know in the community. That the project's current developer persists in this effort to change the R-1 designation is all the more galling. However, to pursue such plans for some of the very few acres in San Pedro which are supposed to remain open space is unforgivable. I would ask your department to refuse all efforts to change the zoning on this tract, including the 15 acres which are and should remain open space.

Please feel free to contact me at [mahevelyn@yahoo.com](mailto:mahevelyn@yahoo.com) if you have any questions about this letter.

Thank you.

Sincerely,

  
Evelyn Mah

cc.: Councilman Joe Buscaino

B168-1



Ms. Evelyn Mah  
2004 Velez Dr.  
Rancho Palos Verdes, CA 90275

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ENVIRONMENTAL  
PLANNING

Erin Strellich  
Environmental Review Section  
DEPARTMENT OF CITY PLANNING  
200 North Spring Street, Room 750  
Los Angeles, CA 90012



December 30, 2012

Erin Strellich, Planning Assistant  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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CITY OF LOS ANGELES

JAN 23 2013

ENVIRONMENTAL  
UNIT

Re: Ponte Vista Project, 26900 S. Western Ave., San Pedro

Dear Erin Strellich,

I oppose the current Ponte Vista project plan. The property should not be rezoned from R-1.

Ponte Vista will have a negative impact on traffic and utilities and the lengthy construction time period will decrease our quality of life. The poor mix of building styles and poor design will negatively impact our area for decades. The number of units and the number of rentals in the plan will also negatively impact our area for decades.

I believe it is irresponsible of Los Angeles Planning Department to approve the plans to build even one unit within the half mile radius of Rancho Holdings LLC at Gaffey and Westmont.

You are welcome and encouraged to view this issue being discussed at the Rancho Palos Verdes City Council meeting. I was the first speaker and then Ron Conrow, Rancho Representative was the next speaker. The full meeting can be viewed at [www.palosverdes.com/rpv/citycouncil/agenda\\_videos](http://www.palosverdes.com/rpv/citycouncil/agenda_videos). The Rancho subject began about 1 hour 44 minutes into the meeting. Please take the time to educate yourself about this subject.

Here is where the L.A. Planning Department becomes responsible. This facility was built in 1973 WITHOUT PERMITS. The permits were finally issued in 1978 after the facility was operational. According to the LA Planning Department site information, Rancho was built in a liquefaction zone, methane zone, landslide area and on an earthquake fault. It was built across the street from homes, close to three schools and dozens of business, the 110 freeway and the nations largest port. Does this sound like the best place to put 25 million gallons of butane and millions of gallons of propane? The planning department approved the use of this site. The LA Planning Department needs to correct their error in allowing this facility to be built. The LA Department of Planning has an opportunity to begin the investigation into Rancho Holding under your Nuisance Abatement program.

In the Ponte Vista EIR regarding Ponte Vista it states *“Under the Risk Management Program, offsite consequence analysis, a worst-case release of butane would spill into an on-site containment pit and could result in a vapor cloud explosion with an impact zone of 0.5 miles. A more likely alternative scenario for release of propane identified by the facility could result in a vapor cloud fire with an impact zone of 0.1 miles. To a much lesser extent, there may be some quantifiable risk of upset from other activities such as product delivery by rail or truck. However, any such event would likely result in much smaller release amounts than quantified in the RMP, and thus, a much lower radius of impact than described in that RMP. Based on the worst-case RMP scenario, there*

B169-1

B169-2





would be no impact to the Project Site.”

Here are the problems with the above statement:

- 1) The Risk Management plan that is filed with the EPA (who does not verify any of the information provided from the company filing the plan) is based on just a 10 minute release of butane or propane from the largest vessel or pipeline. This is not a worst case scenario. The company admits to a half mile blast radius and that includes the Ponte Vista Site.
- 2) *“A more likely alternative scenario for release of propane...with an impact of .1 miles”* is incorrect. There was an accidental release of propane on Oct. 15<sup>th</sup> at the Rancho facility that had many public complaints filed with the EPA over a 5 mile radius from the facility. There have been many propane and butane accidents that have exceeded 1 mile. The Conoco Phillips refinery has a 2.3 blast radius for their Risk Management Plan and they only have 13 million gallons of butane in much smaller containers and in a safer location. The above statement in the EIR is misleading.
- 3) *“To a much lesser extent, there may be some quantifiable risk of upset from other activities such as product delivery by rail or truck. However, any such event would likely result in much smaller release amounts than quantified in the RMP, and thus, a much lower radius of impact than described in that RMP.”* This statement is also misleading and erroneous. There may be a small leak from a truck or rail car, but there have been serious accidents involving tanker trucks and rail cars carrying this material that have had blasts over 1 mile. Toronto Canada had one in Aug. 10 2008. In China on October 2, 2012 there was one that killed 5 people. When the fire department is called regarding a tanker on fire or leaking, they evacuate a 1 mile radius at a minimum.
- 4) *“Based on the worst-case RMP scenario, there would be no impact to the Project Site.”* This statement is completely wrong since even Rancho Holdings states a half mile blast radius and the Ponte Vista site is clearly within that half mile.
- 5) There was a study done by Cornerstone Technologies that put a worst case scenario at a 6 mile blast radius. This is available at [www.nwspnc.org](http://www.nwspnc.org).
- 6) Since 9/11 this facility poses a terrorism risk due to the size, potential impact and location of the facility. The Navy Fuel Depot and the Conoco Phillips facilities do not pose the risk this facility does.

B169-2  
(Cont)

B169-3

B169-4

B169-5

B169-6

B169-7

Butane is not like oil that will ooze out into a catch basin and then be easily cleaned up and put back into a safe container. Rancho Holdings does not have a plan in place to capture any of the escaped liquid butane and put it back into a safe container – because they can’t. There is no way to put out a butane fire. The method the Fire Department follows is to evacuate and allow it to burn out.

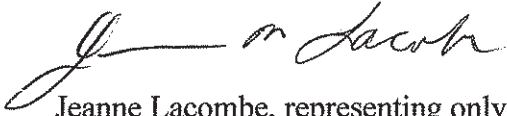
Butane is liquid only when it is below 31 degrees. After it reaches a temperature higher than 31 degrees then it expands 250 times its weight in liquid and forms a vapor. There is no containment for the vapor. Just the air temperature would easily raise any escaped butane above the 31 degree temperature. The current containment basin is only large enough for the contents of one tank in liquid form, not the expanded vapor form. According to the Rancho representatives, just the impact from the liquid going to vapor would cause a blast that would break windows and cause partial demolition of buildings. This would result in many injuries and deaths. That does not include the potential impact if it found an ignition source like a passing car or an on-site generator at Rancho. This will turn the vapor into a 3500 degree fire cloud.

B169-8

The Los Angeles Planning Department first priority is to keep the citizens safe. I do not want any unsuspecting citizens to buy a home in this area due to the risk that Rancho Holdings is to the community. The project should be put on hold until a resolution can be found regarding the Rancho facility to keep the citizens safe.

B169-8  
(Cont)

Thank you,



Jeanne Lacombe, representing only myself and my family and not any group or association.

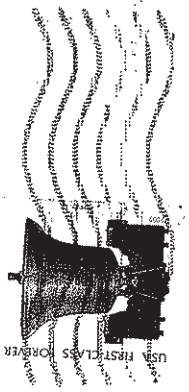
2052 Galenitz Dr  
Riverside, CA 92575

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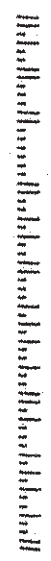
ENVIRONMENTAL  
UNIT

03 JAN 2013 PM 12:1



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90012924375



2004 Velez Drive  
Rancho Palos Verdes, CA 90275  
January 3, 2013

Erin Strellich  
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RECEIVED  
CITY OF LOS ANGELES

JAN 23 2013

Re: Ponte Vista DEIR  
ENV-2005-4516-EIR

ENVIRONMENTAL  
UNIT

Dear Ms. Strellich:

I write to you about the draft Environmental Impact Report which the group that seeks to develop Ponte Vista recently submitted to your department. I am concerned that the residents who may be impacted by this project are being given so little time to respond to it. Accordingly, I would first ask that the city extend the time for residents to submit their comments about the project.

Though I suspect there are other issues which would cause me concern if I had time to examine the report in any detail, there is one which did catch my eye. It is the report's analysis and conclusions about greenhouse gases (GHGs).

I am a college student and have lived in Rancho Palos Verdes all my life. My family's home is part of a tract which lies across Western Avenue from the proposed project. Though I am on the East Coast for most of the year, I consider Rancho Palos Verdes my home and expect to return to it when I complete my studies. Development of Ponte Vista along the lines described in the report will almost certainly impact our area. What is more, contrary to the report's conclusions, this project will likely contribute to those very factors which are causing global warming and thereby leave my generation to bear its consequences and to clean up the mess.

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

The City of Los Angeles has embraced the effort. It adopted "Green L.A.: An Action Plan to Lead the Nation in Fighting Global Warning" in May 2007, in which it proclaims that by 2030 it will reduce GHGs from city operations 35 percent below 1990 levels.

The primary cause of GHG pollution is the combustion of fossil fuels. (California Technical Advisory: CEQA and Climate Change, June 19, 2008 – hereinafter "Technical Advisory"). In California, fossil fuel use is closely related to motor vehicle use.

B170-1



**17,222 Tons.** This project will not reduce GHG pollution to 1990 levels. Indeed, it will not decrease GHGs at all. To the contrary, it will increase them. The developer's DEIR admits it. The site currently generates no GHGs. (p. IV G-4). Ponte Vista stands to generate, by the developer's own estimates, 15,620.55 metric tons of GHGs each year. (p. IV G-27). A metric ton weighs more than the ton most of us are used to dealing with – 2,205 pounds instead of 2,000 – so 15,620.55 metric tons translates to 17,222 tons per year. That amounts to 17,222 more tons of polluting gases than are being generated now; and, if your department were to approve this project, they will be generated every year for the foreseeable future. 172,220 tons over ten years, 344.440 tons over 20 years, etc. This single fact should overshadow all others for anyone considering the project's impact on this form of pollution.

B170-1  
(Cont)

**Responsibility.** The developer tries to rationalize away its need to even address the GHG problem. Hence, the DEIR's statement that no single development is likely to have a significant impact on GHGs. (pp. IV G-15 and 27). Since the problem is planet-wide, that is probably true. However, the fact remains that Ponte Vista will generate substantial amounts of GHGs each year. Moreover, the developer's attempted rationalization is that very line of reasoning which has created the problem. Since no single person, project or business can be held responsible for current levels of the world's GHGs, none takes responsibility for them. That way of thinking must stop now or there is no chance of ever dealing with these pollutants. Only by forcing each project to confront and address the issue properly will there be any hope of reducing GHGs and the many threats they pose. I ask your department to do just that.

B170-2

Please do not hesitate to contact me at [taylorc8181@yahoo.com](mailto:taylorc8181@yahoo.com) if you have any questions about this letter.

Thank you.

Sincerely,



Taylor Cornell

cc.: Councilman Joe Buscaino

Comment Letter No. B170 (Cont)

Taylor Cornell  
2004 Velez Drive  
Rancho Palos Verdes, CA 90275

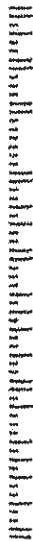
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JAN 23 2013

ENVIRONMENTAL  
UNIT

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09 JAN 2013 PM 10



