

October 18, 2016

Mr. William Jones, Environmental Supervisor II City of Los Angeles Department of Public Works Bureau of Engineering, EMG 1149 S. Broadway, Suite 600, Mail Stop 939 Los Angeles, CA 90015

Dear Mr. Jones,

Adele Healy
President
Brian Vassallo
Vice President
George Palaziol
Secretary
Robert Campbell
Treasurer

The Coastal San Pedro Neighborhood Council (CSPNC) is an elected body that is part of the government of the City of Los Angeles. CSPNC represents the residents of Los Angeles who live in the area of the proposed "Paseo Del Mar Permanent Restoration Project". We welcome the opportunity to make this formal comment on the scope and content of the Environmental Impact Report (EIR) to be prepared for the "Paseo Del Mar Permanent Restoration Project", as invited in the Notice of Preparation (NOP).

We have requested (under separate cover) an extension of the public comment period to ninety days. The short thirty day period does not permit CSPNC to adequately solicit, gather, and integrate stakeholder opinion. Therefore these comments are brief and based entirely on pre-existing CSPNC positions. If the public comment period is extended, we expect that CSPNC will submit further comment, when stakeholders and CSPNC Board members have had adequate time to examine the NOP's "Initial Study".

At its publicly noticed meeting on 17 October 2016, the Board of CSPNC unanimously agreed that the following three issues must be addressed when preparing the EIR:

- **1. Full consideration of a "No Project" alternative.** The "Initial Study" for public review (dated October 2016) omits listing a "No Project" alternative, listing only four construction alternatives. A "No Project" alternative is required under CEQA law. Furthermore, it is particularly important in this case, as there is substantial public interest in the implications of the "No Project" alternative stakeholders have a keen interest in examining the implications of leaving Paseo Del Mar unrestored. We insist that the "No Project" alternative is included and fully developed in the EIR.
- 2. Removal of "Alternative 4 Roadway Realignment" from any further consideration. Of all the various alternatives that have been presented to stakeholders over the years since the landslide, this alternative (rerouting through the White Point Nature Preserve) has been repeatedly and consistently rejected by all relevant stakeholder groups. It is unacceptable to the residents of this area.



In its Board Meeting of 15 October 2012, the Coastal San Pedro Neighborhood Council passed the following resolution:

- Whereas long term options under consideration for the restoration of Paseo Del Mar in the area of the White Point Landslide include the option to reroute the roadway around the landslide and through the White Point Nature Preserve; and,
- Whereas the White Point Nature Preserve is a precious resource to the local and regional community providing great educational and recreational opportunities that are highly valued, unique, and limited;
- Therefore be it resolved, the Coastal San Pedro Neighborhood Council recommends that the option to reroute the roadway through the White Point Nature Preserve be deleted from the options under consideration for the restoration of Paseo Del Mar in the area of the White Point Landslide.

On 22 October 2013, in response to that and other public input, the White Point Landslide Advisory Committee assembled by Councilman Joe Buscaino also recommended dropping that alternative, as pointed out on Page 4 of the BOE's "Initial Study":

City of Los Angeles Council District 15 formed a task force to identify and evaluate alternatives for a permanent solution. The task force recommended that the roadway be restored as opposed to being permanently closed or diverted into the White Point Nature Preserve.

On 28 October 2015, Hilton Yee of AECOM presented the options being explored for reconstruction of Paseo Del Mar, and the option to reroute through the White Point Nature Preserve was excluded, as a result of years of public opinion.

Yet now, in the "Initial Study", the "Roadway Realigment [through White Point Nature Preserve]" has been resurrected. This is in direct contradiction to the wishes of the citizens of the City of Los Angeles. As pointed out above, even the "Initial Study" itself documents this (on page 4).

The stakeholders of the Coastal San Pedro area, and stakeholders elsewhere, have been engaged for years on the subject of the White Point landslide and the question of whether and how to reconstruct Paseo Del Mar. Out of respect for the strongly and consistently expressed wishes of the people (and the solicitation and acceptance of those wishes by government officials), we ask that there be no further consideration of "Alternative 4 — Roadway Realignment", and that it be omitted from the EIR.

3. Inclusion and consideration of elements from the "Paseo Del Mar Beautification Plan" to address long term traffic and safety problems. Paseo Del Mar, the road under consideration for reconstruction, has a long history of speeding and other problems. Since this roadway is being redesigned for this project, that redesign should incorporate solutions to the pre-existing problems. Detailed recommendations were prepared by the design firm Mia Lehrer + Associates in 2004 for a "Paseo Del Mar Beautification Plan". A copy of that plan is appended, and we request that it be included as part of this formal comment.

On 16 November 2015, the Board of the Coastal San Pedro Neighborhood Council passed the following resolution on this matter:



Whereas, the White Point Community Advisory Committee formed by Councilman Buscaino voted to rebuild Paseo Del Mar and part of that decision was to also resolve the ongoing and long term traffic and safety issues on Paseo Del Mar; and,

Whereas, the rebuilding of Paseo Del Mar over the White Point Landslide will greatly increase the volume of traffic and related noise and potential increase of traffic offenses and collisions in the Lower Palisades area; and,

Whereas, prior to the White Point Landslide and closure of Paseo Del Mar at Weymouth Avenue, the residents and stakeholders of the Lower Palisades area suffered from speeding and racing vehicles and general degradation of reasonable expectations of quality of life; and,

Whereas, residents of Lower Palisades submitted in 2004 a detailed traffic plan (Paseo Del Mar Beautification Plan) to the City containing specific traffic calming measures to reduce the speeding and other negative traffic impacts on Paseo Del Mar and and the Coastal San Pedro Neighborhood Council moved forward for consideration by the City of Los Angeles no less than five (5) Motions intended to improve traffic conditions on Paseo Del Mar and to reduce the significant quality of life impacts to Paseo Del Mar residents/stakeholders resulting from speeding, vehicular noise violations, cruising, and crime:

Therefore be it resolved, the Coastal San Pedro Neighborhood Council requests that the City develop a detailed traffic plan including but not limited to the below traffic calming elements in the design of Paseo Del Mar between Gaffey Street and Western Ave and this plan be implemented in conjunction with the City's plan to rebuild Paseo Del Mar: 1) Raised median strip between Roxbury Avenue and Weymouth Avenu e. 2) Turnabouts or stop-signs on Paseo Del Mar at the following avenue intersections: Roxbury, Barbara, and Weymouth. 3) And other traffic calming devices such as illuminated crosswalks, bulb-outs, appropriate signage and speed humps.

In the absence of knowledge of prior problems, it would be plausible to redesign the roadway as much like the pre-landslide road as possible. This would be a mistake, as we point out in our resolution above. Problems were raised, studied, and had potential solutions devised prior to the landslide. It is imperative that these concerns be addressed in the redesign of Paseo Del Mar, and we suggest directly referencing the Mia Lehrer + Associates study of 2004 for specific recommendations to incorporate in the design for the EIR. An abbreviated version of that document is appended here as part of this formal comment.

We appreciate the inclusion of these comments as formal comments to the NOP, and look forward to your written responses.

Yours sincerely,

Adele Healy President

On behalf of the Coastal San Pedro Neighborhood Council Board Cc: Christopher Johnson; Patrick Schmidt, Councilman Buscaino



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	1.0	Regional Connections
	2.0	Proposed Improvements
	3.0	Analysis
	4.0	Existing Signage
	5.0	Proposed Signage
	6.0	Signage Options A
	7.0	Signage Options B
	8.0	Bulb-outs & Crosswalk
	9.0	Expanded Sidewalk & Bulb-outs
I	10.0	Cross-walk Study
	11.0	Inspirational Signage
	12.0	Community Boards
	13.0	What we heard: June 2004
	14.0	What we heard: August 18
	15.0	Diagonal Parking
	16.0	Proposed Sidewalk Expansion



1.0 Regional Connections





2.0 Proposed Improvements





3.0 Analysis

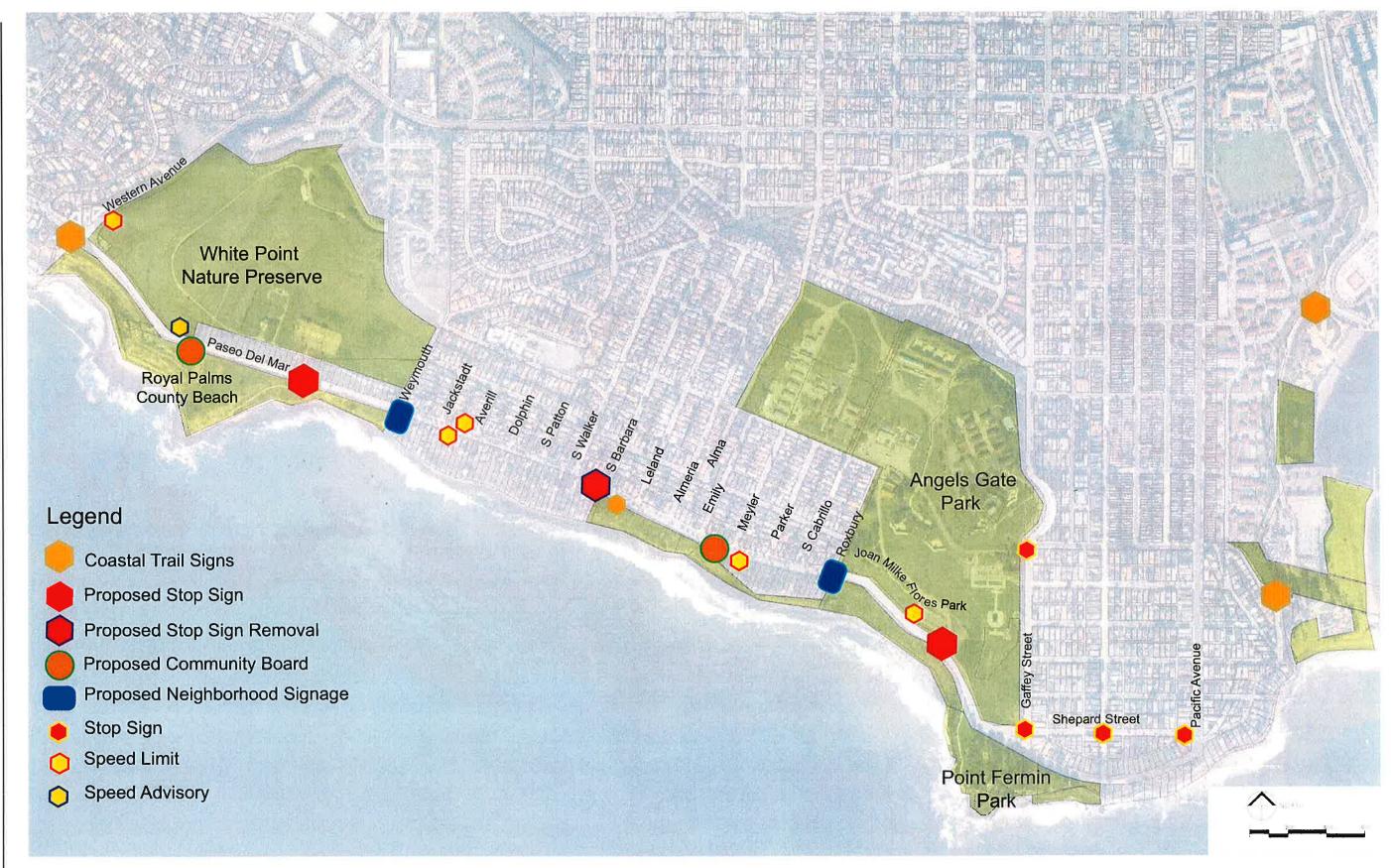






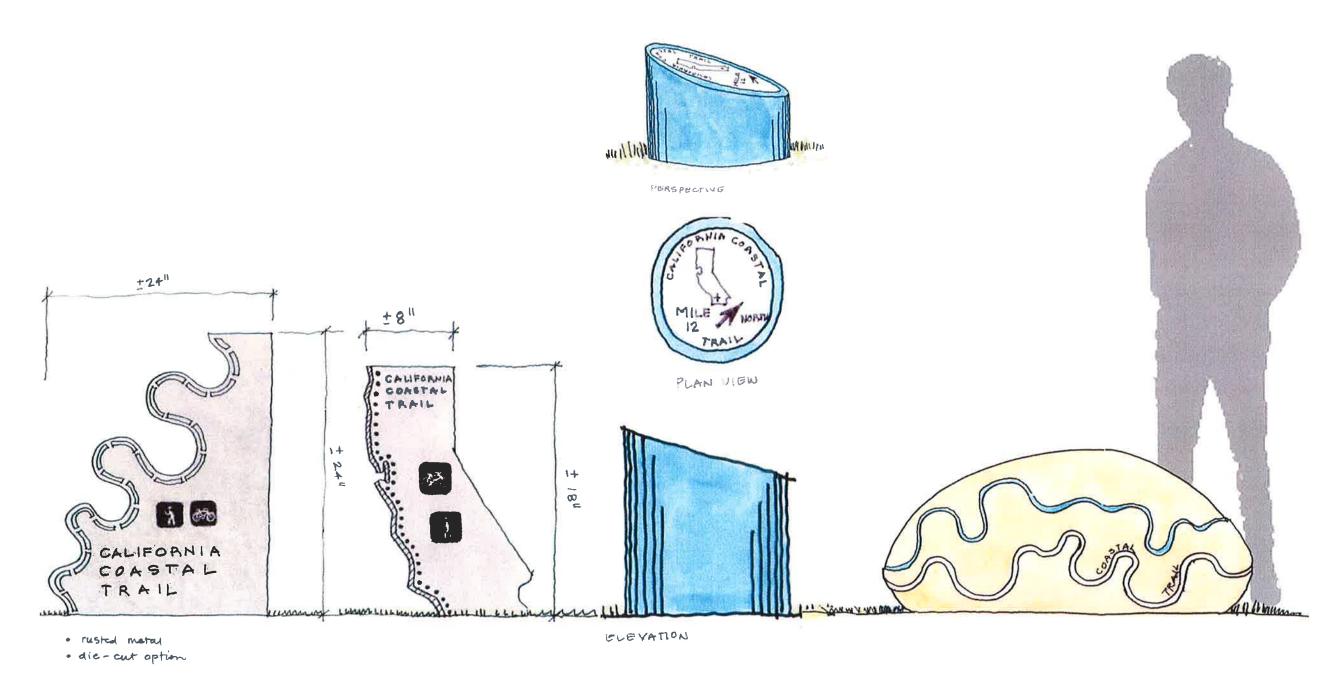
4.0 Existing Signage





5.0 Proposed Signage



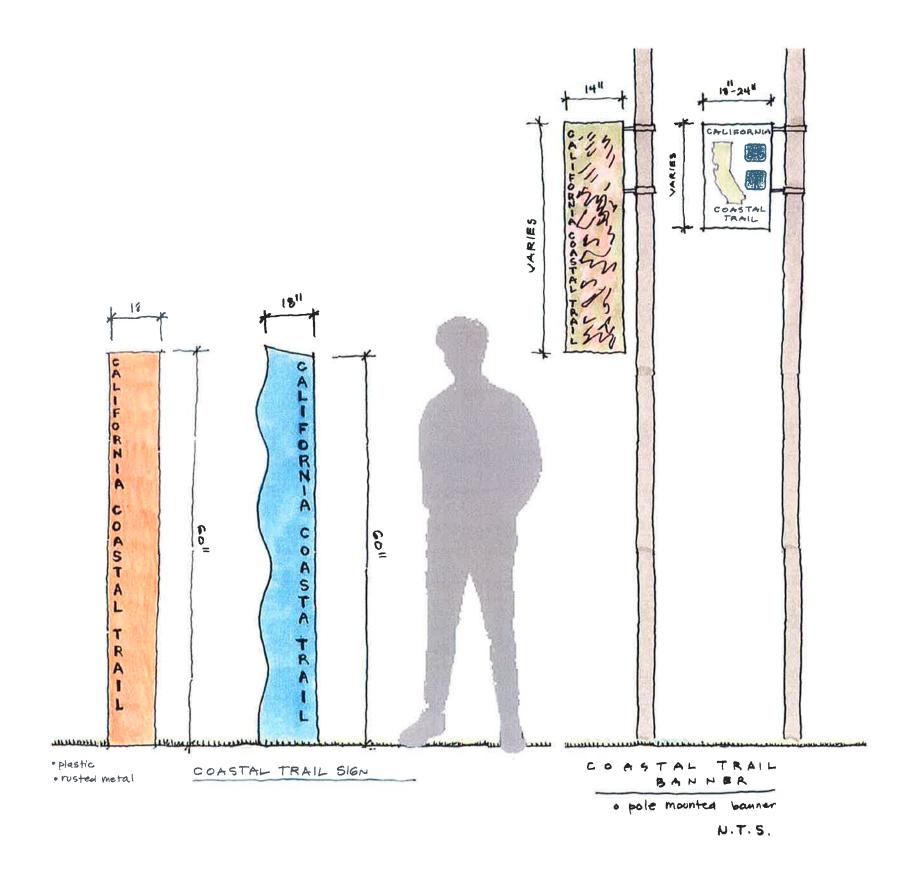


N.T.S.

Paseo Del Mar Beautification Plan

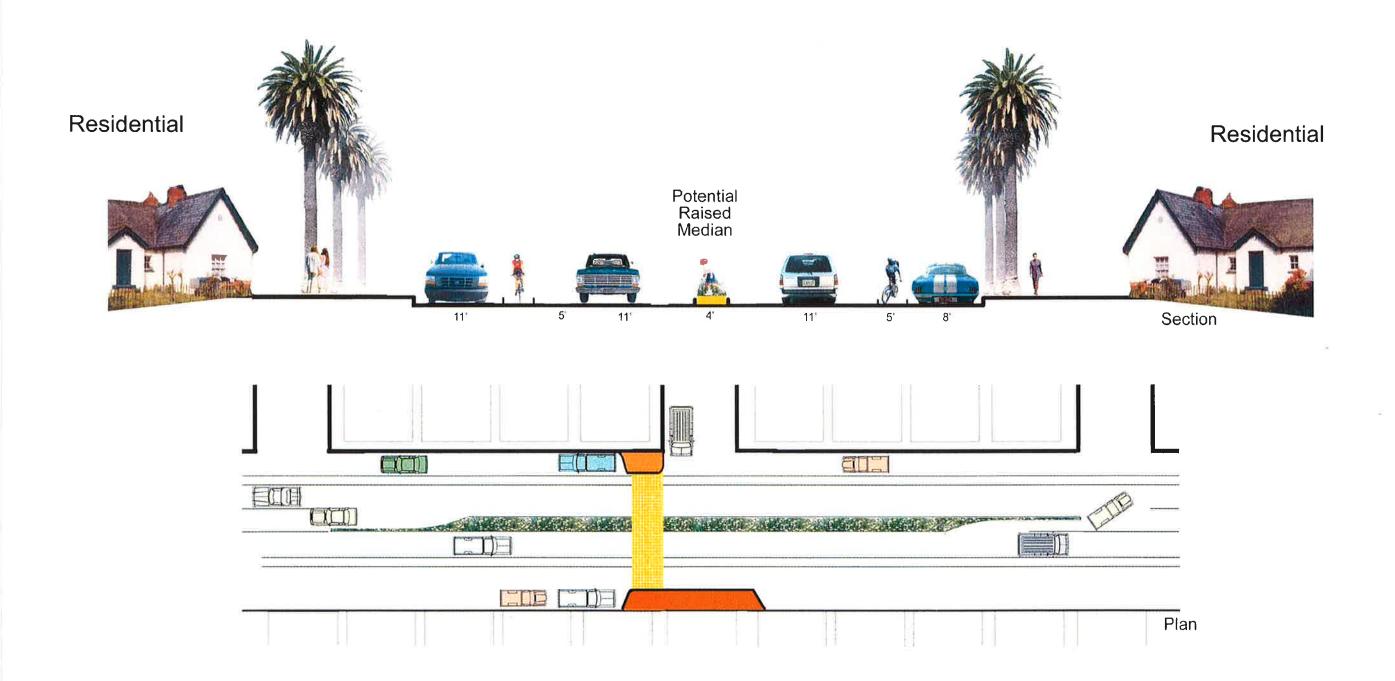
6.0 Signage Options A





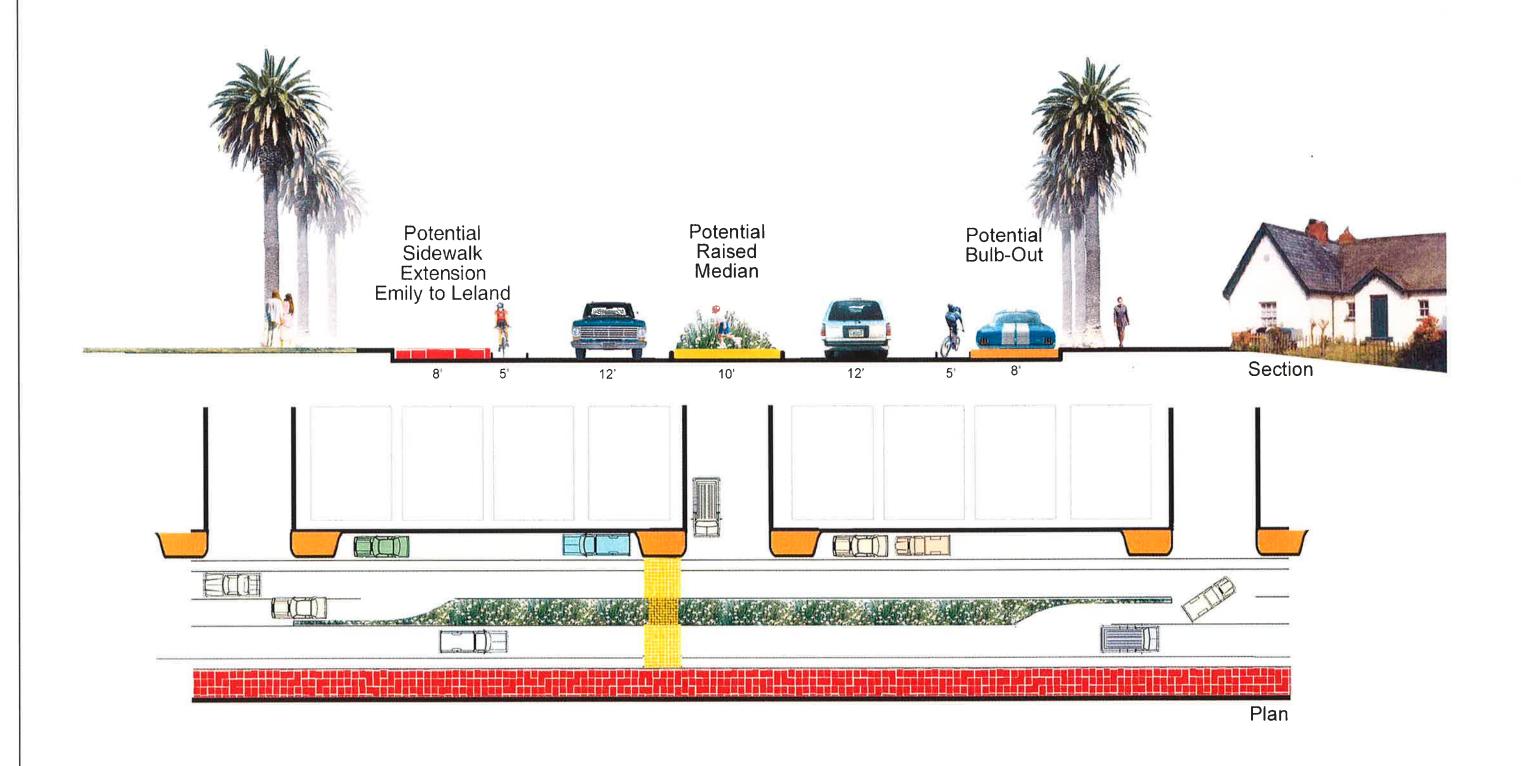
7.0 Signage Options B





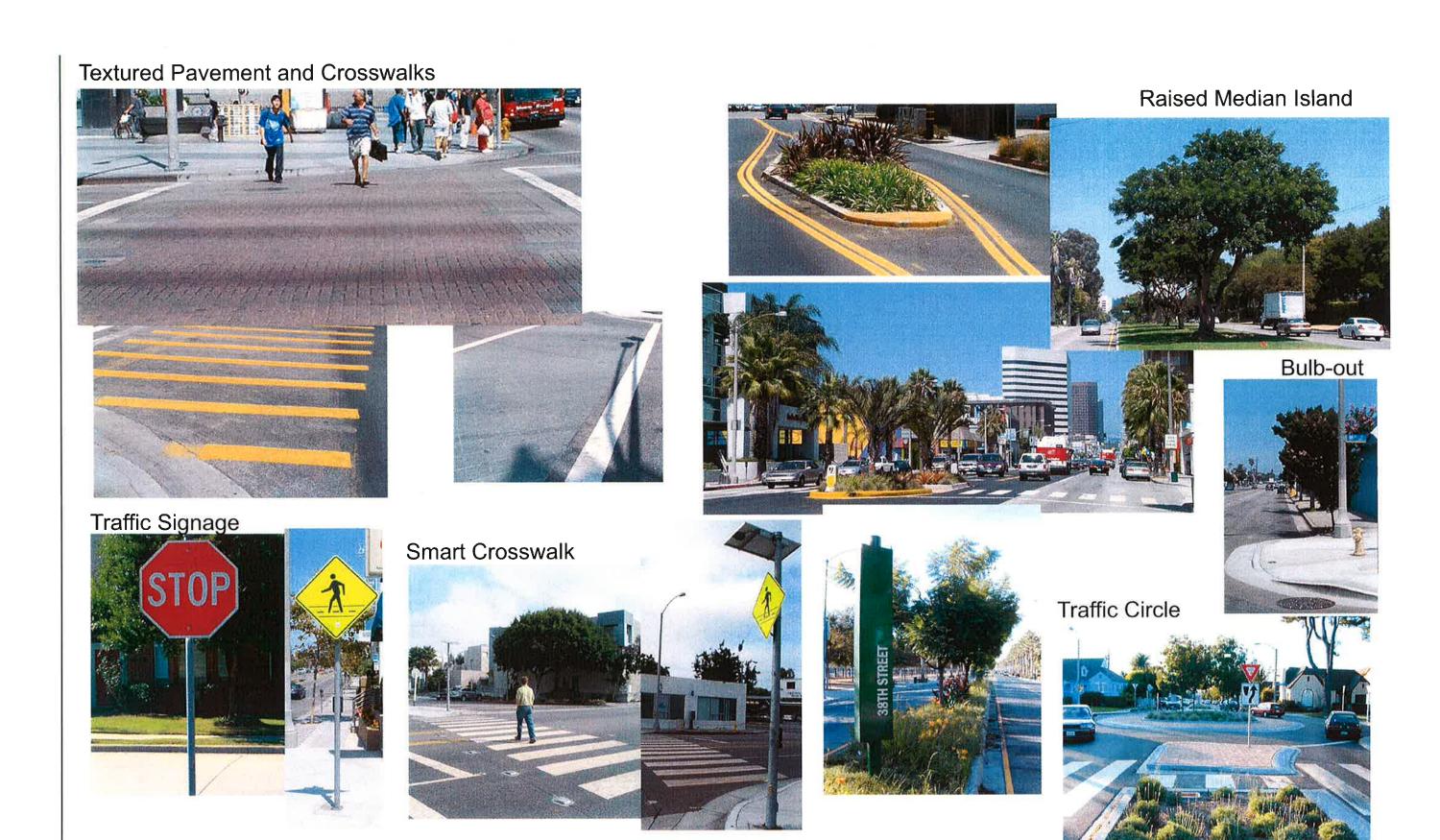
8.0 Bulb-out and Crosswalk





9.0 Expanded Sidewalk and Bulb-out

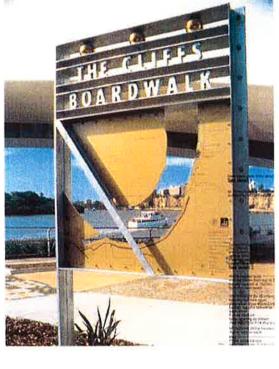




10.0 Crosswalk Study







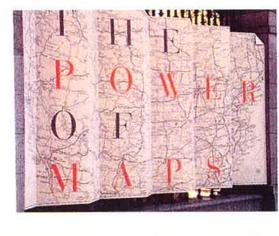




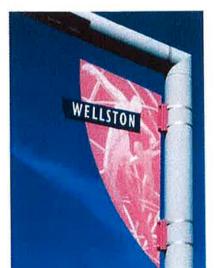










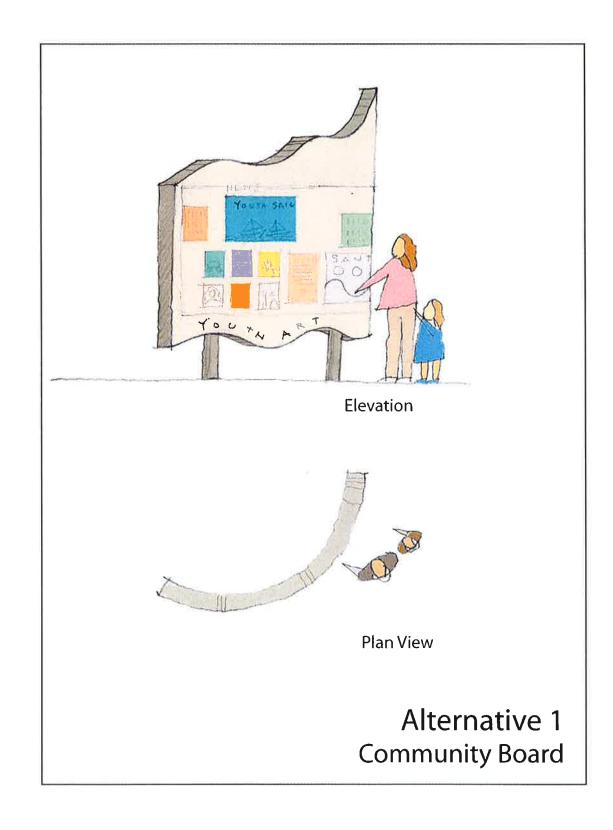


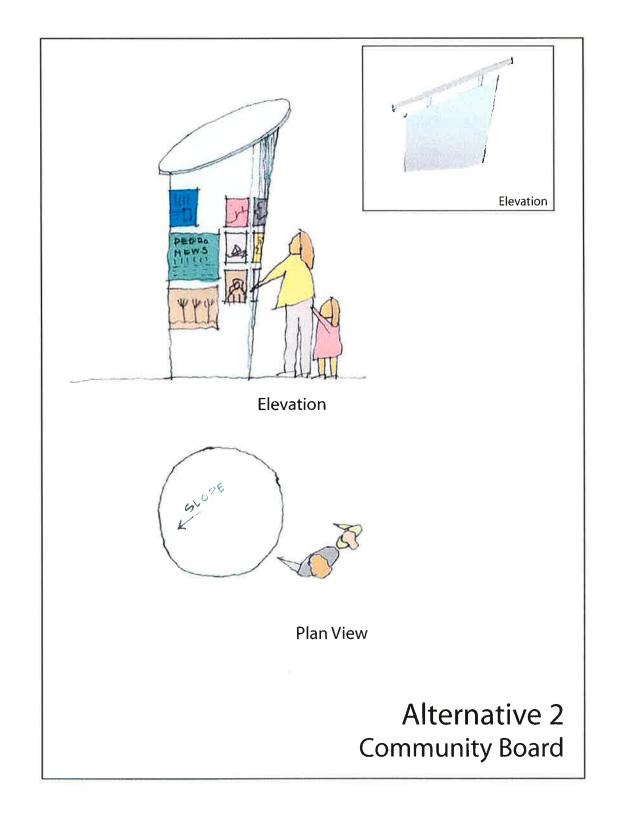




11.0 Inspirational Signage







12.0 Community Boards



Goals:

- · Paseo Del Mar should be a linear park connecting White Point to **Point Fermin**
- Safe parking and crossing points
- · Eliminate drag racing, speeding and noisy partying

Problems:

- Drag racing
- Traffic speeds
- Lack of defined safe crossing points
- · Conflicts with beach goers, walking, biking etc.
- Parking conflicts with residents

Potential Solutions

- Parking
 - o Use existing parking areas more effectively
 - o Potential preferred parking for residents on weekends/holidays
- Speeding
 - o Post speed limits
 - o Police presence
 - o Camera Tickets
 - o Identify Residential Zones
 - o Potential Street Closure on Sundays= PARK

Traffic Calming

- o Signage identifying residential community
- o Medians
- o More Crosswalks
- o Narrow sense of street width
- o Speed bumps or humps-noise issues
- o Additional stop signs noise issues
- General Improvements
 - o Replace existing fencing
 - o Continuous bike trail
 - o Add trees where views would not be blocked.

13.0 What we heard: June 2004

Paseo Del Mar Beautification Plan

Goals:

- · Paseo Del Mar should be a linear park connecting White Point to Point Fermin
- · Safe parking and crossing points
- · Eliminate drag racing, speeding and noisy partying
- · Maintain and Enhance Palisades Character
- Highlight Residential Character through Signage/Pocket Parks/ Paper Streets/Traffic Circle

Problems:

- Drag racing
- Traffic speeds
- · Lack of defined safe crossing points
- · Conflicts with beach goers, walking, biking etc.
- · Parking conflicts with resident

Potential Solutions

- · Safe Pedestrian Crossing
 - **o** Obvious Crosswalks
 - o Clear Signage
 - o Define Key Street In Master Plan for crosswalks
 - o Smart Crosswalks
- Beautification
 - o Change Paseo Del Mar to Residential Scale
 - o Low maintenance median plantings
 - o Extend plan to Western Ave & Shepard St.
- Speed Control
 - o Extend plan to Western Ave, Shepard St. and Gaffey St.
 - o Additional Police Enforcement and Notification
 - o Reduce the 4 (Gaffey St. to Roxbury St.)lanes to 2
 - o Post Speed Limits
 - o Camera Tickets of fake camera boxes
 - o Add texture to paving surface
 - o Motorcycle Noise Checks

Signage

- o Signage identifying residential community
- o Identify California Coastal Trail
- o Informative Plaques
- o Community Board
- o Identify Parking
- Parking Options
 - o Potential preferred parking for residents on weekends/holidays
- General Improvements
 - o Replace existing fencing
 - o Continuous bike trail from Western Ave. to Pacific St.
 - o Add trees where views would not be blocked

Paseo Del Mar Beautification Plan

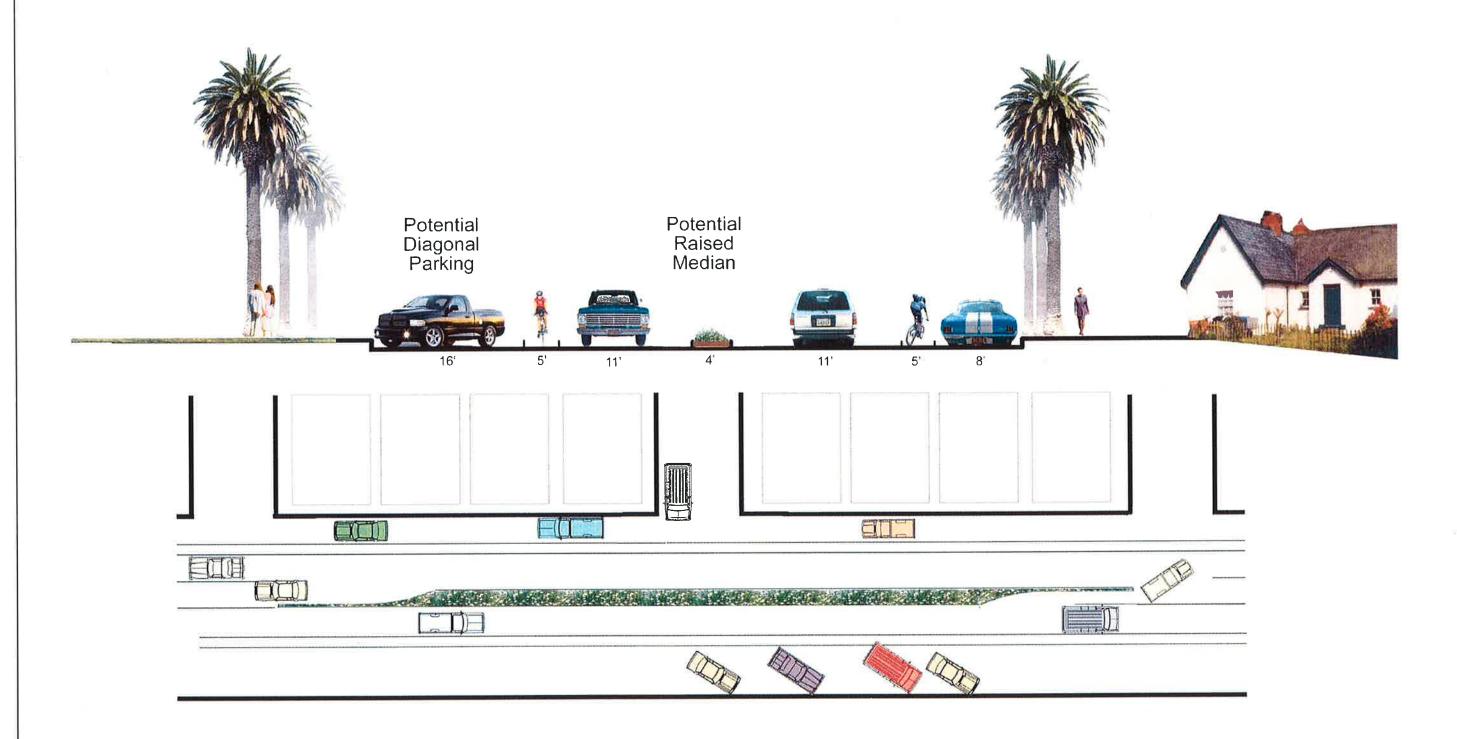
14.0 What we heard: August 18

MIA LEHRER

Coastal

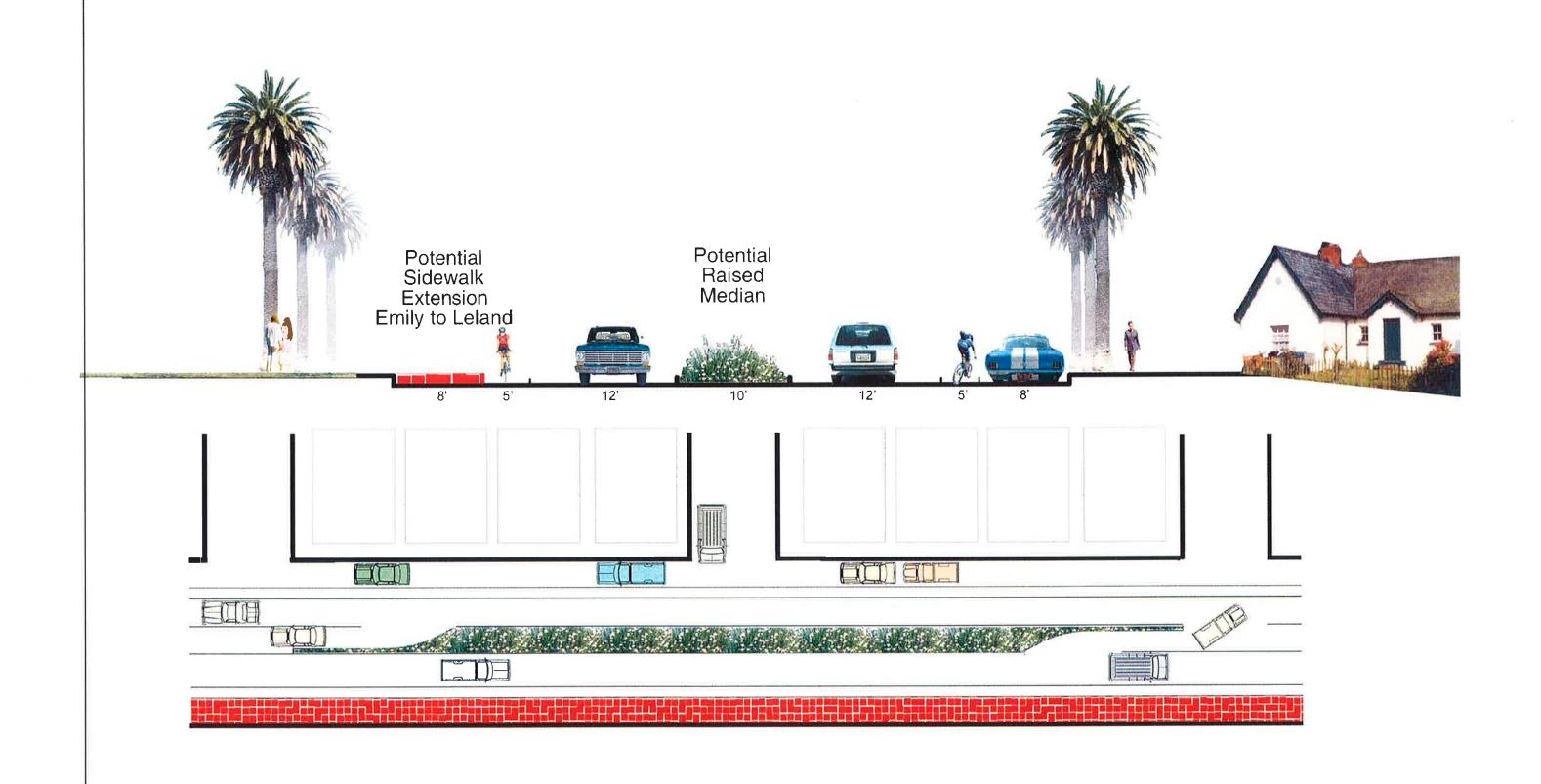
Conservance

Conservance



15.0 Diagonal Parking





16.0 Proposed Sidewalk Expansion

