

CITY OF
Palos Verdes Estates

OFFICE OF
THE CITY MANAGER

August 28, 2017

VIA ELECTRONIC AND U.S. MAIL

Email: DStanta@TorranceCA.gov

Mr. Danny Santana
Planning & Environmental Manager
Community Development Department
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

Subject: Comments in Response to the Notice of Preparation of an Environmental Impact Report for the Proposed Butcher-Solana Residential Development Project

Dear Mr. Santana:

The City of Palos Verdes Estates appreciates the opportunity to comment on the scope of the proposed Environmental Impact Report (EIR) for the above-mentioned project. The proposed project may have significant impacts to Palos Verdes Estates residents, and as such, the City is interested in the EIR particularly focusing on the topics below. We have reviewed the Notice of Preparation and Initial Study and offer the following comments:

TRAFFIC (collectively reviewed by City of Palos Verdes Estates and City of Rolling Hills Estates):

Traffic Volume Data – The traffic count data originally collected in April 2016 was increased by 1% to account for growth to 2017. The EIR should confirm this growth factor is appropriate. This confirmation can be made by collecting current traffic count data at a few specific locations and compare that to the adjusted traffic counts used in the Revised Traffic Impact Study (Revised Study), Solana Torrance, April 20, 2017. If this comparison identifies a significant difference between the traffic counts, new traffic count data should be collected.

Trip Distribution – What is the basis for the proposed project distribution pattern in the Revised Study? Trip distribution to the east using Rolling Hills Road may be a more likely path as it appears to be a shorter distance (e.g. to I-110 Freeway).

Analysis Intersections – The EIR should include analysis of Palos Verdes Drive North/Hawthorne Boulevard, Palos Verdes Drive North/Crenshaw Boulevard, and Palos Verdes Drive North/Rolling Hills Road-Portuguese Bend Road. Analysis of intersections should use the measurable

degradation found in the City of Rolling Hills Estates Traffic Impact Analysis guidelines to identify a significant impact.

Parking – The proposed parking is less than current City of Torrance standards for parking. The EIR should address/support the use of a lower parking requirement by providing data from other sources to justify the reduction. Inadequate parking for residents and guests may cause a spillover of parking into the surrounding area and may negatively impact traffic circulation on Via Valmonte and Hawthorne Boulevard.

Site Plan – The proposed location of the access point on Hawthorne Boulevard should be relocated to the southern end of the project site. This will minimize the impacts of the right turn access with any NB to SB U-turns on Hawthorne Boulevard. In addition, a NB left turn access from Hawthorne Boulevard into the proposed project site might be feasible if the access is moved southerly.

OPEN SPACE

Public Access: Proposed Lot 2 would be 6.0 acres in area along the bluff top immediately above the former mine. Lot 3 would be 12.92 acres in area on the level bluff top south of Lot 2. This area is open and accessible to the public from Ernie Howlett Park in the City of Rolling Hills Estates and from Via Pinzon, Via Pavion and the Torrance Boundary Trail in the City of Palos Verdes Estates. Additional discussion is needed to determine how best to preserve and maintain the undeveloped open space, including potential restrictions to public access if adequate safeguards are not identified to provide for public safety and maintenance.

Fire Safety and Weed Abatement: The upper section of the site contains overgrown vegetation and debris. Adequate measures need to be identified to address fire safety and weed abatement to protect residences located within close proximity.

CONSTRUCTION IMPACTS

The project site is currently undeveloped and includes various types of vegetation that provides habitat for rodents, birds, insects and other animals. Disruption of the property as a result of initial grading may cause fauna to intrude upon surrounding neighborhoods. The EIR should address a pest control management plan.

NOISE

Operational noise should be evaluated to determine if vehicular and outdoor recreational uses will cause an impact to surrounding residential areas. The design of parking structures should be considered to minimize amplification that could unreasonably project beyond the project site.

The City of Palos Verdes Estates appreciates being kept directly apprised of actions and activities related to this project. In turn, we look forward to providing additional comments and working

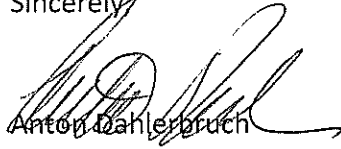
Mr. Danny Santana

August 28, 2017

Page 3

collaboratively with the City of Torrance and nearby cities. If you have any questions or need additional information, please contact Deputy City Manager/Planning and Building Director Sheri Repp Loadsman at (310) 378-0383 or srepp@pvestates.org.

Sincerely,



Anton Dahlerbruch
City Manager

c: Mayor and City Council
Sheri Repp-Loadsman, Deputy City Manager/Planning and Building Director
Ken Rukavina, Director of Public Works/City Engineer