

DRAFT COMMENTS Draft EIR for Rancho San Pedro Redevelopment (DEIR)

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re: Comments on Draft EIR (DEIR)

Thank you for this opportunity to comment on the DEIR for the proposed redevelopment of Rancho San Pedro.

General Comment

The proposed project would replace the existing 478 units with 1553 units, and construct 47 new units at 327 Harbor Blvd, for a total of 1600 new units, an increase of 1122 units. *The DEIR estimates that the project would result in an increase of approximately 2,715 residents. The DEIR also analyzed 12 additional proposed projects for their cumulative impact. They estimate that these 12 projects would add 1508 new units with 3,649 new residents for a cumulative total of 6,464 new residents.*

The DEIR bases their population increases on the average household size for all of the San Pedro Community Plan Area, 2.42 persons per residential unit. Rancho San Pedro has a significantly higher average household size, 3 persons per unit. 41.4% of households at Rancho are 3-5 persons compared to 34.6% for San Pedro as a whole and 11.2% are 6+ persons while San Pedro is 4.3%, resulting in just over 3 persons per household. The average size for Rancho San Pedro should be used in the FEIR

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Social Services

The Social Services section addresses four services: Fire, Police, Schools, and Libraries and finds that the project would have no significant impact on any of these.

Schools:

The DEIR student generation rate estimates that the project would result in Barton Hill elementary school being 69 students over capacity and San Pedro High School 136 students over capacity. These numbers are probably low since the DEIR used San Pedro wide student averages rather than the student generation rates for Rancho San Pedro which are higher than for San Pedro as a whole. According to the One San Pedro Transformation Plan, the population of Rancho San Pedro (RSP) is significantly younger than the population of San Pedro with 41.2% of RSP under 18 while San Pedro only has 22.9% under 18. This should be corrected in the FEIR.

Further, when the student generation rates for the additional 12 nearby projects are included, the DEIR estimates that Barton Hill would be 630 students over capacity, Dana 131 students over capacity, and San Pedro High School a whopping 444 students over capacity.

The DEIR relies on the that payment of the student generation fee as sufficient mitigation. It also states that no new schools are planned. Considering that the cumulative impact on Barton Hill would result in more than twice the number of students as the capacity of Barton Hill, it would appear that a new elementary school would be needed. Furthermore, the overcrowding at San Pedro High School must be addressed. While the law appears to be that the school fees satisfy the environmental impact requirement, it is well known that they do not provide sufficient funding for needed classroom space.

The DEIR states that the surrounding schools may have capacity available, but does not provide any statistical information about their current capacity and current enrollments. Also, alternative methods of furnishing adequate facilities for students should be provided in the FEIR.

The DEIR also fails to address adult education needs.

Finally, the DEIR fails to address other costs of student increases such as the need for additional crossing guards, pedestrian control, and after school programs. One third of Rancho San Pedro Residents participating in a survey conducted by One San Pedro (11/2018) indicated that they felt their children were unsafe walking to and from schools or bus stops. The Rancho San Pedro Transformation Plan states that they are concerned about speeding cars, inconsiderate drivers, and a lack of marked crosswalks and stoplights. This should be addressed in the FEIR.

Libraries:

The DEIR indicates that the project would result in a 3.3% increase in the population served by the library and the cumulative impact would be an 8.4% increase, yet proposes no mitigation measures. In a survey conducted by One San Pedro (11/2018), 47% of residents said that a library was very needed and an additional 28% said it was somewhat needed. At a minimum the Specific Plan should include a satellite library with area for story time and a study hall and/or a plan for regular transportation to the existing library which is badly in need of an upgrade.