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Environmental Impact Analysis Process



FINAL
ENVIRONMENTAL IMPACT STATEMENT
AIR FORCE, SPACE DIVISION
HOUSING PROJECT
SAN PEDRO, CALIFORNIA
JULY 1986

DEPARTMENT OF THE AIR FORCE

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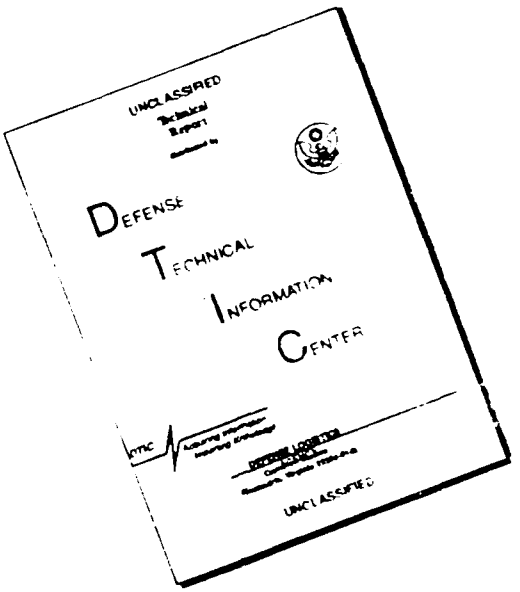
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July 24, 1986

OFFICE OF THE ASSISTANT SECRETARY

TO: ALL INTERESTED GOVERNMENT AGENCIES, PUBLIC GROUPS, AND INDIVIDUALS

We are pleased to provide you a copy of Volume 2 which completes the Final Environmental Impact Statement (EIS) for the proposed construction and operation of 170 single family housing units in San Pedro, CA. The Final EIS consists of the Draft EIS (Volume 1, previously provided) and enclosed (Volume 2) summary, comments, replies and errata. The document is provided in compliance with the Regulations of the President's Council on Environmental Quality.

This Final EIS describes the socioeconomic, biophysical and environmental effects expected to result from construction and operation of the proposed housing project. There will be a 30-day waiting period before a final decision will be made on the proposed action. A decision on the proposed action will be made after September 2, 1986.

If further information is required, please contact:

HQ Space Division/DEV
PO Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960
ATTN: Mr. Robert Mason
Telephone (213) 643-0933

GARY D. VEST
Deputy for Environment, Safety and Occupational Health
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

1 Atch
Final EIS, Vol. 2

COVER SHEET

(a) Responsible Agency: U.S. Air Force

(b) Proposed Action: Construction and operation of 170 single-family housing units for field grade and senior officer personnel on 40 acres of land in the southeast portion of White Point in San Pedro, CA. These officers, primarily consisting of majors, lt. colonels, and colonels, are assigned to the Space Division at Los Angeles Air Force Station, El Segundo, CA.

(c) Preferred Alternative: Negotiations between the U.S. Air Force and the City of Los Angeles have resulted in the selection of a Preferred Alternative to the Proposed Action. The Preferred Alternative is 14± acres in the northwest portion of White Point and all of Bogdanovich Park. The siting on White Point is at the intersection of Western Ave. and 25th St. adjacent to the existing Navy officer housing. Approximately 10± acres will be for housing, and the remaining 4± acres will be used as buffer area. This siting is similar to the Alternative B siting in the Draft Environmental Impact Statement, with the exception that 14± acres will be reverted instead of 16 acres.

The U.S. Air Force presented the Preferred Alternative to the California Coastal Commission on July 9, 1986. The California Coastal Commission unanimously concurred that the Preferred Alternative is consistent with the objectives of the California Coastal Management Program.

(d) Responsible Individual: Mr. Robert C. Mason
HQ SD/DEV
P.O. Box 92960
Los Angeles, California 90009-2960
Phone: (213) 643-0933

(e) Designation: Final Environmental Impact Statement (FEIS)

(f) Abstract: This FEIS addresses the construction and operation of 170 single-family housing units on forty (40) acres in the southeast portion of the area known as White Point in San Pedro, CA. Field grade and senior officers (majors to colonels) assigned to Los Angeles Air Force Station, CA, would occupy the housing. Alternatives to the Proposed Action include various siting configurations of the 170 units on other portions of White Point and on city of Los Angeles Department of Parks and Recreation properties at Bogdanovich Park and the Upper Reservation of Fort MacArthur. Both of these alternative sites are also located in San Pedro, CA. The principal impacts of the Proposed Action involve land use, loss of some recreational facilities, and disturbance of former NIKE facilities that may have historical significance. Principal impacts of the housing at Bogdanovich Park and the Upper Reservation of Fort MacArthur include the displacement of existing recreational facilities and the associated impact on the local community's use of these facilities.

(g) Released to the public July 24, 1986.

FINAL ENVIRONMENTAL IMPACT STATEMENT AIR FORCE, SPACE DIVISION HOUSING PROJECT SAN PEDRO, CALIFORNIA

Prepared for:

U.S. AIR FORCE, SPACE DIVISION
San Pedro, California

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July 1986

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SUMMARY

FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED AIR FORCE SPACE DIVISION HOUSING PROJECT

SAN PEDRO, CALIFORNIA

DESCRIPTION OF PROPOSED ACTION

The U.S. Air Force, Space Division (SD), headquartered at Los Angeles Air Force Station (LAAFS), is proposing to construct 170 housing units primarily for field grade and senior officers (major through colonel) assigned to SD at LAAFS. The site for the Proposed Action consists of 40 acres of land located on the southeastern portion of the area known as White Point (WP) in the community of San Pedro, in the City of Los Angeles, California. WP is located approximately 20 highway miles (within 1 hour commuting time) southeast of LAAFS.

WP is a 145-acre former U.S. Army (Army) NIKE Missile site. The parcel is divided by Paseo del Mar. The entire 145 acres was declared as excess property by the Army in the early 1970s. The 30 acres south of Paseo del Mar (bordering the Pacific Ocean) was conveyed to the County of Los Angeles Department of Parks and Recreation in 1978. The remaining 115 acres north of Paseo del Mar was conveyed to the City of Los Angeles Department of Parks and Recreation also in 1978. The conveyence of these parcels to the county and city, respectively, was through the U.S. Department of Interior (DOI) with the condition that the property be developed for recreational uses. Included in the property transfer agreements is a clause that allows the Federal government to revert all or part of the property if needed for national defense.

The Proposed Action involves the construction of 170 single-family housing units on 40 acres (4.25 units/acre) of the 115-acre WP area,

north of and extending westward along Paseo del Mar and west of Weymouth Ave. The Proposed Action site is relatively level, bounded on the north by a sharp elevation gradient (slope), and includes the area of the former NIKE missile facilities and the currently used community garden.

PREFERRED ALTERNATIVE

Negotiations between the Air Force and the City of Los Angeles have resulted in the selection of a Preferred Alternative to the Proposed Action. The Preferred Alternative is 14± acres in the northwest portion of WP and all of Bogdanovich Park (BP). The siting on WP is at the intersection of Western Ave. and 25th St. adjacent to the existing Navy officer housing. Approximately 10± acres will be housing, and the remaining 4± acres will be used as buffer area. This siting is similar to the Alternative B siting in the Draft Environmental Impact Statement (DEIS), with the exception that 14± acres will be reverted instead of 16 acres.

The Air Force presented the Preferred Alternative to the California Coastal Commission on July 9, 1986. The California Coastal Commission unanimously concurred that the Preferred Alternative is consistent with the objectives of the California Coastal Management Program.

PUBLIC REVIEW

The DEIS for this proposal was distributed to members of the public and Federal, state, and local agencies on April 3, 1986. The DEIS was filed with the U.S. Environmental Protection Agency (EPA) on April 4, 1986, and notice of publication appeared in the Federal Register on April 11, 1986, which initiated the public comment period. The 45-day public review and comment period (40 CFR 1056.10) ended on May 27, 1986; however, the Air Force accepted written comments until June 2, 1986, to allow for delays in mail delivery. During the review period, public comments on the DEIS were solicited. Written comments were submitted to

Headquarters Space Division at LAAFS in El Segundo, California. Verbal comments were received at a public hearing held at Peck Park Auditorium in San Pedro, California on April 22, 1986. A total of 300 comments were received on the DEIS. The predominant concern expressed during the public comment period was the impact the Air Force housing on the 40-acre parcel at WP would have on the development of a State Park on the combined state, county, and city property at WP. Other issues identified included the Air Force's consideration of alternative sites, impacts to existing recreational facilities at BP and the Upper Reservation of Fort MacArthur (UFM), the loss of the community gardens at WP, and the impact on the Coastal Zone.

The Air Force response to these comments addresses each comment and question individually. In addition, an errata sheet provides factual corrections to the DEIS. Since changes in response to the comments are minor, the final EIS will consist of the DEIS, the comments, the responses, the corrections to the DEIS, and this summary. This summary is similar to the one in the DEIS, but it has been revised slightly to reflect the public comments received.

NEED FOR PROPOSED ACTION

In accordance with the U.S. Department of Defense (DOD) regulations, the Air Force is responsible for the health and welfare of its military personnel and their dependents, including provisions for adequate housing through either the availability of government-provided housing or the payment of housing allowances to obtain (rent or own) nongovernment housing in the local community. LAAFS differs from most Air Force installations in that until 1982 it had no onbase family housing. For more than 15 years, the Air Force has been involved in efforts to provide adequate, affordable housing for its personnel at LAAFS. The recently constructed 370 housing units for junior officers and enlisted personnel on a portion of the Fort MacArthur Military Reservation in the San Pedro community has partially met the objective

of providing adequate housing for all military personnel assigned to LAAFS.

Annual surveys of military personnel at LAAFS who are not provided government housing and paid housing allowances show that field grade and senior officers are experiencing financial hardships in obtaining adequate housing. The results of the most recent housing survey (September 1985) indicate that of the 854 officers at LAAFS, 582 are considered unsuitably housed. The lack of adequate housing and financial shortfalls have created problems for the Air Force in recruiting and retaining qualified personnel to meet its mission at LAAFS as compared to other installations. In recognition of these problems and the critical need for adequate housing of military personnel assigned to LAAFS, the 1983 and 1985 Congresses approved funds for the construction of an additional 170 housing units.

The housing units are planned to include ninety (90) 3-bedroom units with an average 1,375 square feet (ft^2) and eighty (80) 4-bedroom units with an average 1,570 ft^2. The Proposed Action also includes several acres designated for open space and recreational uses (tennis courts, basketball courts, etc.), as well as landscaping to enhance the visual quality of the development. The units will house approximately 170 military personnel and their family members.

ALTERNATIVES TO PROPOSED ACTION

As mandated by the National Environmental Policy Act (NEPA) of 1969, NEPA implementing regulations of the President's Council on Environmental Quality (CEQ) and Air Force regulations, alternatives to the Proposed Action, including the "No Action" Alternative, were evaluated as part of the environmental impact analyses process. The "No Action" Alternative would mean that the housing project is not undertaken and maintenance of the status quo with regard to inadequate housing and financial hardship problems for field grade and senior officers assigned to LAAFS.

Other alternatives to the Proposed Action involve the development of the housing units at other sites in the vicinity of LAAFS. The criteria for evaluating the feasibility of alternative locations for the housing developments includes:

1. Site must be within 30 miles and a 1-hour or less commuting distance.
2. Site must be Federal government-owned or the Federal government must have reversionary option because funds appropriated by Congress for this project do not include costs for land purchase.
3. Site is not already committed to other Federal use.
4. Site usage is compatible with surrounding land uses.
5. Site size is sufficient to allow economic development of the housing units.

Forty-nine regional alternative sites which met criteria 2 above were initially identified and evaluated. Of these, 34 had been deeded to local school districts and were eliminated from further consideration due to current or planned use. The remaining 15 were supplemented by the results of other surveys and studies by DOD agencies and recommendations from local elected officials and a committee tasked by the City of Los Angeles to study the Air Force housing needs. These evaluations and recommendations resulted in the identification of eight local alternative siting configurations to the Proposed Action for the 170 housing units involving utilization of various combinations of White Point (WP), Bogdanovich Park (BP), and Upper Reservation of Fort MacArthur (UFM), all located in the San Pedro community. These local alternatives are summarized in Table 1.

BP is an approximately 22-acre City of Los Angeles park located northeast of WP. The land for the park was conveyed to the City of Los Angeles through the DOI after it had been declared as excess by the U.S. Navy (Navy). The site had been used by the Navy until the late 1960s for housing of military personnel (Portsmouth Housing Area). The

Table 1. Alternative Configurations for Air Force Housing at White Point, Bogdanovich Park, and the Upper Reservation of Fort MacArthur

Project Alternatives	White Point Area (Acres)	White Point Housing Units	Bogdanovich Park Area (Acres)	Bogdanovich Park Housing Units	Upper Reservation of Fort MacArthur Area (Acres)	Upper Reservation of Fort MacArthur Housing Units	Remarks
Alternative A (Buildable Acres)	50 (32)	170	0	0	0	0	50 acres in northwest portion of WP. Original proposed action (July 1984 EA).
Alternative B (Buildable Acres)	16	80	22 (16.5)	90	0	0	16 acres in northwest corner of WP and all of BP.*
Alternative C (Buildable Acres)	16	80	22 (16.5)	90	0	0	16 acres in southeast corner of WP and all of BP.
Alternative D (Buildable Acres)	9	80	22 (16.5)	90	0	0	City of Los Angeles proposal. 9 acres in southeast corner† of WP and all of BP.
Alternative E	16	80	0	0	21	90	16 acres in northwest corner of WP* and 21 acres at UFM.**
Alternative F	16	80	0	0	21	90	16 acres in southeast corner of WP and 21 acres at UFM.**
Alternative G	9	80	0	0	21	90	9 acres in southeast corner of WP† and 21 acres at UFM.**
Alternative H (Buildable Acres)	0	0	22 (16.5)	80	21	90	22 acres at BP and 21 acres at UFM.**

*The requirement for 16 buildable acres may require the Air Force to revert additional acres.

†Air Force does not concur because 9 acres is not sufficient for housing compatible with local density.

**The Air Force does not concur with this alternative due to the need to relocate numerous existing uses at UFM and the high cost of demolition associated with removal of the existing buildings. These demolition costs were not included in funds appropriated by Congress.

NOTE: The number of units listed for each alternative is provided for planning purposes only; actual mix may differ slightly.

Source: ESE, 1986.

transfer agreement for this property also contained the reversionary clause for national defense. Portions of the park have been developed as soccer and baseball fields. The City of Los Angeles offered BP to the Air Force as a split site with WP for the housing development.

UFM consists of 111 acres of which 64 acres were conveyed to the City of Los Angeles Department of Parks and Recreation through the DOI after being declared as excess by the Army. The national defense reversionary clause is applicable to this portion of UFM. The remaining 47 acres of UFM were conveyed to the Los Angeles Unified School District. The school district property agreement contains a 30-year waiver by the Federal government of the reversionary clause as the property was intended as a school site. A 30-year waiver was granted for relocation of San Pedro High School due to the planning (i.e., variations in enrollment capacity) necessary for construction justification. The area currently is being used as a vocational-technical training center, automobile body and maintenance shops, dead records storage facility, and a school bus maintenance area. The 64 acres of Parks and Recreational property contains the Korean Bell site, the Osgood-Farley Battery Historical site, and numerous World War II (WWII)-era buildings which are being used by the Angel's Gate Cultural Center, other local civic groups, and the California Conservation Corps. Due to waiver of the reversionary clause on the school district property, other uses of the property, and topographic features of the site, only 21 acres of the 111 acres of UFM are available as an alternative site to the Proposed Action.

ENVIRONMENTAL EFFECTS OF PROPOSED ACTION AND ALTERNATIVES

A summary comparison of the potential enviromental effects of the Proposed Action and the eight alternatives listed in Table 1 is presented in Table 2. In Table 2, comparisons of the effects were made for specific types of potential effects (with no mitigation) within each environmental discipline/resource area. The evaluation in Table 2

Table 2. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Topography	- Excavating/filling/ grading	◒	●	●	◒	◒	◒	○	○	○
Geology/ Seismology	- Landslides	◒	●	◒	◒	◒	◒	○	○	○
	- Expanding soils	E	E	E	E	E	E	E	E	E
	- Ground water seepage	◒	○	○	◒	◒	○	◒	◒	○
	- Seismic movements	E	E	E	E	E	E	E	E	E
	- Erosion/flooding/tsunamis	○	◒	○	○	○	○	○	○	○
Paleontology	- Disturb fossils	○	◒	●	●	●	◒	○	○	●
Flora/Fauna	- Loss of ecological habitat	◒	●	◒	◒	○	◒	◒	○	○
	- Impact significant species	○	●*	◒	○	○	◒	○	○	○
Air Quality/ Climatology	- Construction fugitive dust	●	◒	◒	◒	○	●	●	◒	●
	- Demolition dust/inhalation	◒	○	○	◒	○	●	●	●	●
	- Vehicle emissions	E	E	E	E	E	E	E	E	E
Noise	- Construction/demolition	○	◒	◒	◒	◒	◒	○	○	◒
	- Traffic	E	E	E	E	E	E	E	E	E
Water Resources	- Increase runoff volumes	◒	●	◒	◒	◒	◒	◒	○	○
	- Change water quality	◒	●	◒	◒	◒	◒	◒	◒	○
Land Use/Zoning	- Compatability with surrounding densities	○	○	◒	○	●	◒	○	●	○
	- Compatability with planned uses	●*	●*	●*	●*	●*	◒	◒	◒	●*
	- Displacement of active uses	◒	○	●*	●*	●*	●*	◒*	●*	●*

Table 2. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation (Continued, Page 2 of 3)

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Demography/ Housing	- Increase population densities	E	E	E	E	E	E	E	E	E
	- Impact real estate values	○	○	○	○	◒	○	○	◒	○
Employment/ Economy	- Increase in labor supply	E	E	E	E	E	E	E	E	E
	- Increase in local expenditures/activity	E↑	E↑	E↑	E↑	E↑	E↑	E↑	E↑	E↑
Public Services	- Increase demands on school, fire, police, medical facilities	E	E	E	E	E	E	E	E	E
Recreation Facilities	- Loss of existing facilities	○	○	●*	●*	●*	●*	●*	●*	●*
	- Loss of open space	●	●	◒	◒	◒	◒	◒	○	○
	- Increased demands on facilities	E	E	E	E	E	E	E	E	E
Utility Systems	- Upgrade water system	◒	○	◒	●	●	○	◒	◒	◒
	- Upgrade stormwater system	○	◒	◒	○	○	◒	○	○	○
	- Upgrade gas system	○	○	○	○	○	◒	◒	◒	◒
	- Demand on sewer, solid waste, gas, electric, and telephone systems	E	E	E	E	E	E	E	E	E
Transportation	- Increase in traffic congestion	◒	○	◒	◒	◒	◒	◒	◒	◒
	- Need for improvements	E	E	E	E	E	E	E	E	E
Historical/ Archaeological	- Impact on significant sites	●*	◒	◒	●*	◒	◒	●*	◒	◒

Table 2. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation (Continued, Page 3 of 3)

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Aesthetics	- Change in vistas	●	●	◒	◒	◒	○	◒	○	○
	- Impair view	◒	◒	○	◒	●	○	◒	●	○
Coastal Zone Management	- Impact on coastal zone	●	●	◒	◒	◒	●	●	●	◒

*Potentially significant adverse impact.
†Positive or beneficial impact.

○ = relatively lower level of impact compared to other alternatives.
◒ = relatively moderate or average level of impact compared to other alternatives.
● = relatively higher level of impact compared to other alternatives.
E = relatively equivalent level of impact compared to all other alternatives.

Source: ESE, 1986.

indicates the relative level of effect compared to all other alternatives. As required by CEQ guidelines (Section 1502.14), a detailed comparison of the environmental impacts of the Proposed Action and alternatives within each discipline/resource area is presented in Section 3.6 of the DEIS. As indicated in Table 2 (solid circles and asterisk), potentially significant adverse impacts (with no mitigation) may occur to flora/fauna, land use, recreational facilities, and historical sites depending upon whether the Proposed Action or a specific alternative is selected. The following paragraphs summarize the potentially significant adverse impacts that are identified in Table 2 and describe possible measures that may be used to mitigate these impacts. Mitigation measures are described in detail in Section 6.0 of the DEIS.

Potentially significant adverse impacts to the existing Astragalus trichopodus var. lonchus resource (commonly called milkvetch) may occur if Alternative A is selected (Table 2, Flora/Fauna). This alternative encompasses the only known population of this plant on WP. The Astragalus is a food source of the endangered Palos Verdes blue butterfly (Glaucopsyche lygdamus palosverdesensis). During 1983, 1984, and 1985 only three mature Astragalus plants were observed at WP. No seedlings were produced during this period, probably due to extensive ground cover of weeds and annual grasses, which quickly outcompete Astragalus seedlings. As indicated in the DEIS, these plants were not located on the parcel of WP which is the Proposed Action. In December 1985, only two specimens of the Astragalus were observed growing there, the third plant having died sometime during 1985. In December 1985, both plants were senescing and producing very little vegetation. One of these died before field studies were conducted in late February and March 1986. The remaining plant produced leaflets on approximately six branches but did not flower in 1986. It subsequently expired sometime between the March and May 1986 surveys of WP. At this time there are no specimens of Astragalus trichopodus growing at WP.

The City of Los Angeles has proposed development of WP as a State Park and the State of California is cooperating in this proposal. Therefore, the Proposed Action and Alternative A, which include the greatest number of acres on WP (40 acres or 35 percent and 50 acres or 43 percent, respectively) are considered to have relatively higher potential impacts on planned, future uses of WP, compared to the other alternatives (see Table 2, Land Use). Because BP has been developed and currently is used for soccer and baseball fields, alternatives which include the use of BP (Alternatives B, C, D, and H) are also considered to have relatively higher levels of potential impacts on planned land use.

As indicated in Table 2 (Recreation Facilities), potentially significant adverse impacts to existing recreational facilities and the local community's use of these facilities would occur if any of the alternatives involving BP and/or UFM are selected. The soccer/footfall field and the baseball field at BP would be displaced by Alternatives B, C, D, and H. Organizations that currently utilize these fields, including the American Youth Soccer Organization (AYSO), would be forced to use facilities at other locations. Although there are two other baseball/softball fields nearby on Paseo del Mar, they are in poor condition. There are no other public soccer fields in southern San Pedro. The city has stated that it expects the Air Force to construct replacement facilities but has not offered a site. The Air Force will contribute to the cost of replacement fields on land provided by the city, provided there are sufficient funds remaining after the contracts for construction are let and the construction cost of the housing to the government is reasonably fixed. No funds for replacement fields are included in the project budget because no funds were needed for the WP site originally planned. BP was not originally considered for this project precisely because, unlike WP, it had been developed and was in use.

The Proposed Action and Alternatives C and F would impact the former NIKE launch facilities (Table 2; Historical/Archaeological). These

facilities may be a significant historical site due to their involvement with the coastal defense system of Los Angeles. Mitigative measures to minimize the impacts to these facilties include the development of data recovery plans based on consultation with the State Historic Preservation Office and the Advisory Council on Historical Preservation. Additional mitigative meausures are described in Section 6.14 of the DEIS.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES THAT WOULD BE INVOLVED WITH THE IMPLEMENTATION OF THE PROPOSED ACTION OR ALTERNATIVES

The implementation of the Proposed Action will involve the irreversible and irretrievable commitments of certain resources. Except for certain site-specific resources, the commitments of resources will be similar whether the Proposed Action is implemented or any of the eight alternatives. Therefore, only if the Air Force took no action could the irreversible and irretrievable commitments of certain resources be avoided. The following paragraphs briefly describe these resources.

The land or site used by the Proposed Action or alternatives is considered a resource. Open space, coastal land is a relatively scarce resource in the geographic area. Although it may not be considered a permanent irreversible or irretrievable use of the land, the Proposed Action and alternatives (except Alternative G which involves only BP and UFM) will commit various areas of WP (9 to 50 acres) to residential use for the near future. However, if the Air Force no longer requires the housing, the structures and roads theoretically could be removed and the site returned to its existing semi-natural, open-space state. The remaining land at WP (106 to 65 acres), 31 acres of county land south of Paseo del Mar, and 18 acres of Royal Palms State Beach (combined total of 155 to 114 acres) would remain for recreational uses.

The Proposed Action and Alternatives C and F would include the area of the former NIKE Missile Launchers which is probably eligible for

inclusion in the National Register of Historic Places due to its former involvement as part of the Coastal Defense System. The commitments of these historical resources will be irretrievable; however, there are other former NIKE facilities that exist in the region.

The soccer/football fields and baseball field at BP would be displaced by Alternatives B, C, D, and H. Organizations that currently utilize these fields, including the AYSO, would be forced to use facilities at other locations. The Air Force will contribute to the cost of replacement fields on land provided by the city, provided there are sufficient funds remaining after housing construction costs are reasonably fixed (see previous discussion).

The construction of housing units on UPM (Alternatives E, F, G, and H) will require the demolition of 25 to 30 1- and 2-story buildings. The demolition of these buildings will impact recreational uses currently onsite. Activities of the California Conservation Corps and Angel's Gate Cultural Center will be displaced by this alternative. Relocation of these recreational uses will be the responsibility of the City of Los Angeles. The Osgood-Farley Historical Monument, the Korean Bell Site, and the Merriam-Leary and Barlow-Saxton Coastal Battery Casements would not be affected by any of the alternatives.

Labor, capital, and materials such as wood, concrete, and glass used to construct the housing project will be irretrievably committed. Fuel and other energy resources for construction also will be irretrievably committed. The commitment of these resources for the Proposed Action would be similar to the commitment for any housing project. Commitments of labor are not considered significant losses because adequate labor resources are available in the area. Also, the commitments of employment opportunities, wages, and other construction expenditures will have positive primary and secondary economic impacts for the area. The commitments of construction materials and energy resources are not considered significant losses because adequate supplies of these resources exist in the area.

PREFACE

This document was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, NEPA-implementing regulations of the Council on Environmental Quality (CEQ), and U.S. Air Force regulations. Comments received on the Draft Environmental Impact Statement (DEIS) during the public review period and the U.S. Air Force's responses to these comments are contained in this document. Section 1.0 contains the written comments, whereas Section 2.0 contains verbal comments recorded at the April 22, 1986 Public Hearing. The U.S. Air Force's responses to each comment are contained in Section 3.0. Section 4.0 contains a list of errata and provides factual corrections to the DEIS.

The complete environmental analysis is contained in the DEIS which was released to the public on April 3, 1986. Since changes in response to the comments are minor, the Final Environmental Impact Statement (FEIS) will consist of the DEIS and the comments, responses, and corrections contained in this document.

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1.0 PUBLIC COMMENTS: LETTERS

In accordance with the National Environmental Policy Act (NEPA) as implemented by the President's Council on Environmental Quality (CEQ) regulations (40 CFR 1500), the U.S. Air Force (USAF) is required to invite comments from Federal, state, and local agencies on the draft Environmental Impact Statement (EIS) before preparing a final EIS. In addition, the USAF is required to request comments from the public, affirmatively soliciting comments from those persons who may be interested or potentially affected by the action. Section 11.0 of the DEIS contains the list of individuals, organizations, public officials, and agencies (with jurisdiction by law or special expertise) that received a copy of the DEIS and which the USAF requested comments.

A 45-day period is required by CEQ regulations (40 CFR 1506.10) to allow agency and public review of the DEIS. The DEIS was filed with the Environmental Protection Agency (EPA) and distributed to the public on April 3, 1986. The Federal Register Notice appeared on April 11, 1986, which initiated the public comment period. The 45-day comment period ended on May 27, 1986. The USAF accepted comments until June 2, 1986 to allow for possible delays in the postal system.

This section contains the written comments received from Federal, state, and local agencies, elected officials, and the public (individuals and organizations) following the review of the DEIS. To ensure an accurate public record, a typewritten transcript of handwritten comments is provided. Section 2.0 contains comments received on the DEIS at the public hearing that was held on April 22, 1986. In accordance with CEQ regulations (40 CFR 1503.4), the USAF is required to assess and consider comments to the DEIS and respond to these comments in the FEIS. Responses to the comments are contained in Section 3.0. The responses are keyed by number to the comments in this section.

IN REPLY REFER TO

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
Sacramento Area Office
2800 Cottage Way
Sacramento, California 95825

Natural Resources

APR 08 1986

Mr. Robert Mason
HQ Space Division/DEV
Worldway Postal Center
PO Box 92960
Los Angeles, CA 90009-2960

Dear Mr. Mason:

We have reviewed your letter with attachment Draft EIS dated April 3, 1986, and found no Indian lands or resources under the jurisdiction of this office involved.

Sincerely,

Area Environmental Specialist

United States Department of the Interior
NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

H24(WR-RRA)

April 9, 1986

Mr. Robert Mason
Headquarters Space Division (AFSC)
Los Angeles Air Force Station
Worldway Postal Center, Post Office Box 92960
Los Angeles, California 90009-2960

Dear Mr. Mason:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the proposed Air Force, Space Division Housing Project, San Pedro, California (dated April 1986). The document satisfactorily addresses cultural resources planning procedures at this stage of project development.

1 In view of the fact all proposed alternatives being considered contain potentially eligible National Register properties that could be impacted adversely by construction, early consultation with the California State Office of Historic Preservation (and the Advisory Council if necessary) is advised in order to obtain eligibility determinations for the prehistoric and historic sites and to develop an appropriate mitigation plan. This recommendation is reinforced by the special significance of Gabrielino sites, so many of which have been destroyed by several decades of extensive urban construction in southern California. We also recommend selection of the alternative that will allow intact preservation of as many of these sites as possible.

2 It would be helpful to include the results of SHPO consultation, and copies of any formal MOAs, in the final environmental document for this project. We would also appreciate a copy of WESTEC's archeological survey and testing report referenced on Page 4-101 of the DEIS for library reference.

Please do not hesitate to call me at (415) 556-5190 (FTS or commercial) if our office can be of further assistance.

Sincerely,

Helene R. Dunbar
Acting Chief, Interagency Archeological Services
Division of National Register Programs

cc: DEC (WASO-762)
James Huddleston (RP)

JOHN J. RESICH, Jr.
A Professional Corporation
Attorney at Law
840 WEST 9TH STREET
SAN PEDRO, CALIFORNIA 90731
(213) 832-2618
(213) 832-0387

April 10, 1986

HW Space Division / DEV
Post Office Box 92960
Worldway Postal Center
Los Angeles, California 90009-2960
Attention: Mr. Robert Mason

Re: Environmental Impact Study for
White Point Area

Gentlemen:

I am in receipt of your Environmental Impact Analysis Report dated April 3, 1986 wherein military housing at White Point was reviewed together with the alternative sites including a number of various configurations which included the property located at Bogdonovich Park. I have enclosed previous letters directed to the Department of the Air Force in regard to the use of Bogdonovich Park as an alternative site for housing. In your Environmental Impact Draft Report, if Bogdonovich Park is used for Air Force housing, the residents of the City of San Pedro, and the immediate adjacent areas, will lose a valuable recreational facility. At the present time, Bogdonovich Park is used for recreational purposes. It encompasses 16.5 acres of recreational land which, at the present time, has not been completely developed. It is my understanding from conversations with the Department of Recreation and Parks and the City Council's office that the plans for Bogdonovich Park include additional fields together with lighting at that facility plus other recreational facilities. If the Air Force were to take Bogdonovich Park, there is no other available land within the general location to provide 16.5 acres of land for recreational purposes except for the White Point land. If the Air Force were to take Bogdonovich Park and utilize that facility for housing, there would be no adequate land to relocate the present soccer fields and baseball diamond as there is no land of that magnitude or acreage within the City of Los Angeles in our area that is amenable to develop for lighted recreational facilities.

3

If additional field locations are found, a problem would be lighting and how it would affect the residents in any of the adjacent areas of the city. At the present time, Bogdonovich Park is ideally located for a lighted field as lighting would not cause a burden or hardship to any of the adjacent resident owners as there is sufficient distance to buffer them from such light and as the majority of the property is commerical in nature and the residential property is a great enough distance away not to cause any detrimental impact on the neighborhood.

If Bogdonovich Park is taken and used for Air Force housing, substantial numbers of children in the community will be displaced, programs will be lost and the community will be without recreational facilities. At the present time, San Pedro and the City of Los Angeles is totally lacking in sufficient recreational facilities to handle the youth of our community. With the building of Air Force housing totalling approximately 170 units, this will overburden the already overused and overutilized fields and recreational facilities in San Pedro. This in itself will cause a substantial impact on the recreational facilities and the programs already in existance. If Bogdonovich Park were to be lost to Air Force housing and adequate additional acreage of approximately 16 acres were not found and located within a close geographic proximity to its present location, the children of the community would be without the programs that serve and meet their needs. At the present time, the AYSO Soccer Program, Mary Star of the Sea High School, San Pedro High School, adult soccer leagues and high school football teams are all utilizing the facilities at Bogdonovich Park. In addition to those groups, numerous other groups use the facility for dog training. Individuals also use the facility for nature walks and to enjoy the beautiful view available at that site. If Air Force housing were to be located on that property, all of these recreational uses would conclude immediately and the time to find and construct a new facility would be over two years. For your information, when Bogdonovich Park was conceived and developed, it took over four years to develop the park and another two years to have it up to the standards to be used so that it would not be destroyed after the first use.

4

I would suggest and recommend that the Air Force take as much of White Point as possible to develop their Air Force housing or to use the alternative building site in alternatives (e) (f) or (g) of the Environmental Impact Report. This would be the best use of this land for housing as opposed to keeping it open and developing a state park at White Point. It is my understanding from speaking to numerous individuals that they do not understand the full import of a state park at this location and would not be amenable to the development of a state park which allowed for overnight camping. This view of having a state park at the White Point site is shared only by a small number of individuals in the community who have been very vocal in their support for such plan. There have been no economic impact reports as to the advisability or feasability of developing this area into a state park and such report would meet with considerable resistance. Thank you for your review and consideration of these viewpoints.

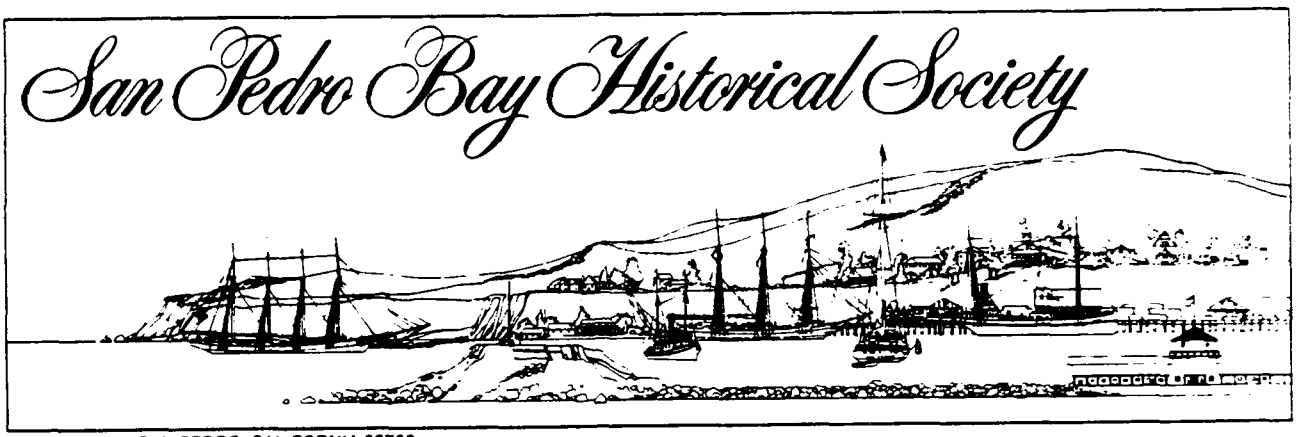
Sincerely,

JOHN J. RESICH, JR.

cc: James F. Boatright
Deputy Asst. Sect. of the Air Force

Lt Gen. Forrest S. McCartney

JJR:vb
Enclosures



P.O. BOX 1568, SAN PEDRO, CALIFORNIA 90733

April 21, 1986

TO: U. S. Air Force

FROM: A. A. Almeida
President, San Pedro Bay Historical Society

Dear Sirs:

You may be speculating as to why the San Pedro Bay Historical Society has been so adamant against the Air Force's plans for top rank officer housing. To begin with under Article II. Purpose under Section 2, the language is very specific regarding our reason of existence. The Section reads: the Society shall work for the preservation and registration of art (historical), architecture, historical sites, and monuments in the area. In addition, Section 5. very specifically states the following: The Society recognizes, emphasizes and seeks to preserve the uniquely heterogeneous nature of San Pedro Bay Community - a place where people of all ages, varied ethnic and religeous backgrounds and economic situations live, work and play together in a potpourri of buildings and parks, featuring a wide gamut of cultural and architectural styles and purposes.

5

As can be seen the Society would be derelict in its duty not to defend the White Point area as you propose no matter what emergency action you may invoke.

You may well be convinced that your cause is just and right because you have behind you the power and glory of the President and the Pentagon. But for us to not defend what we percieve to be a noble and righteous endeavor would mean abandoning our inherent American right, nay, our obligation to oppose you with all our might in the acceptable legal manner.

We do not oppose your presence in our fair community. It is a historical fact that the military has been part of San Pedro since before WWI. All this talk about San Pedrans being anti-military is nonsensical. We welcome the United States services to be our neighbors but please do not ask us to relinquish one bit of land yet open for man and animal to enjoy freely as God intended.

Respectfully,

Arthur A. Almeida

Saint Peter's - Episcopal Day School
1648 WEST NINTH STREET · SAN PEDRO, CALIF. 90732 · (213) 833-7356

RECTOR
THE REV. HARRY R. EDWALL
CHAIRMAN OF THE BOARD
ALEX B. CRAMPTON, M.D.
PRINCIPAL
MRS. ROBERT P. HENRY

Hq. Space Division/DEV
P.O. Box 92960
Worldway Postal Center
Los Angelees, CA. 90009-2960
Attn: Mr. Robert Mason
(213) 643-0933

Dear Mr. Mason:

As Chairman of the Parochial School we want the Air Corps to know we are hoping you will get the White Point area for housing.

Sincerely,
(Major) Alexander B. Crampton M.D.

EPISCOPAL

Typewritten Translation of Alexander B. Crampton

Hq. Space Division/DEV
P.O. Box 92960
Worldway Postal Center
Los Angelees, CA. 90009-2960
Attn: Mr. Robert Mason
(213) 643-0933

Dear Mr. Mason:

As chairman of the Parochial School we want the Air Corps to know we are hoping you will get the White Point area for housing.

Sincerely,
(Major) Alexander B. Crampton, M.D.

A. B. CRAMPTON, M.D., F.A.C.S.
SURGEON
[redacted] STREET
SAN PEDRO, CALIFORNIA 90732
756 Legacy Place
(213) 833-0203

756 LEGACY PL
S.P. 90732

Dear Mr. Mason:

I came to San Pedro in 1946 to practice Surgery; I had been trained in Surgery in Baltimore, Md. In 1941 I had been sent to Washington, D.C. to the main army hospital there to do Surgery. Within 5 months I was sent to Hawaii but I was commissioned in the 1st General Hospital for Surgery and we were sent overseas immediately. I spent 5 years over seas & then came to California on discharge.

I am 100% for the Air Corps & to get White Point for housing and would be proud to have them with us here.

I would like to see another Park started here where it is scenic a point of scrub brush, and rabbits, the City of L.A. is very lax in keeping it & something I know as I started a religious private school here

A. B. CRAMPTON, M.D., F.A.C.S.
SURGEON
~~4851 WEST 5TH STREET~~
SAN PEDRO, CALIFORNIA 90732

which has been very successful and we have been fortunate in having Children from Military families in our School — St. Peter's Episcopal Day and Jr. High School.

We are with you in getting the housing in San Pedro

I am retired from surgical practice now but most interested in trying to secure the best for our community

Most sincerely

Alexander B. Crampton, M.D.

Typewritten Translation of Alexander B. Crampton, M.D.

756 Legary Place
(213) 833-0203

Dear Mr. Mason:

I came to San Pedro in 1946 to practice surgery; I had been trained in Surgery in Baltimore, Md. In 1941 I had been sent to Washington, D.C. to the main army hospital there to do Surgery. Within 5 months Pearl Harbor hit & I was commissioned to form the 1st General Hospital for Surgery and we were sent overseas immediately. I spent 5 years overseas & then came to California on discharges

I am 100% for the Air Corps to get White Point for housing and would be proud to have them with us here.

I would hate to see another Park started here where it becomes a point of rape, drugs, and robbery. The City of L.A. is very lack in keeping up anything. I know as I started a religious private School here which has been very successful and we have been fortunate in having children from Military families in our School---St. Peter's Episcopal Day and Jr. High School.

We are with you in getting the housing in San Pedro.

I am retired from surgical practice now but most interested in trying to secure the best for our community.

Most Sincerely,
Alexander B. Crampton, M.D.

CHARLES K. ARMSTRONG, Mayor *I.E SYNADINOS, Mayor Pro Tem*

Councilmen
CARL JACOBSON • KEITH SCHULDT • JACK E. SIADEK

April 22, 1986

Space Division/DEV
Attn: Mr. Bob Mason
P. O. Box 92960
Los Angeles, California 90009-2960

Dear Mr. Mason:

I am fully in support of the 170 units of military housing planned for location at White Point in San Pedro by the Air Force Space Division in El Segundo.

Shortage of affordable housing has long posed a hardship on Air Force personnel assigned to the Space Division. Lack of suitable military housing has scattered Space Division's 2000 military personnel throughout ninety communities and three counties, some commuting up to two hours each way.

6 Completion of the 170 units at White Point, to supplement the 370 units of military housing at Fort MacArthur, would resolve this hardship. Additionally, with the housing concentrated in one location, a transportation system could be implemented to bring the military personnel to and from Space Division, thus alleviating some of the traffic in and around El Segundo.

The City of El Segundo has long been dubbed the "Aerospace Capital of the World." El Segundo is proud to host this essential branch of our National defense system.

I am sure Mayor Bradley and the City of Los Angeles are no less proud. It would appear appropriate for Los Angeles to demonstrate their support of Air Force Space Division by assisting with their housing requirements.

Sincerely,

Jack E. Siadek
Mayor

JES:eh

350 Main Street El Segundo, California 90245 (213) 322-4670

SACRAMENTO ADDRESS
STATE CAPITOL
SACRAMENTO CA 95814
(916) 445 7906

DISTRICT OFFICE
1514 CABRILLO AVENUE
TORRANCE CA 90501
(213) 320 6262

Assembly
California Legislature

GERALD N. FELANDO
ASSEMBLYMAN, 51ST DISTRICT
HERMOSA BEACH LOMITA MANHATTAN BEACH PALOS VERDES ESTATES
RANCHO PALOS VERDES REDONDO BEACH ROLLING HILLS
ROLLING HILLS ESTATES SAN PEDRO TORRANCE
REPUBLICAN CAUCUS CHAIRMAN

COMMITTEES
GOVERNMENTAL ORGANIZATION
JUDICIARY
UTILITIES & COMMERCE
SELECT COMMITTEE ON CHILD ABUSE
JOINT COMMITTEE ON FISHERIES AND AQUACULTURE
JOINT LEGISLATIVE AUDIT COMMITTEE
COMMISSION OF THE CALIFORNIAS

REPLY TO:
■ DISTRICT OFFICE
_ SACRAMENTO OFFICE

April 22, 1986

Mr. Robert Mason
U.S. Air Force/Space Division
P.O. Box 92960
Los Angeles, CA 90009-2960

Subject: White's Point Housing/Draft EIS

Dear Mr. Mason:

This letter is to respectfully convey my deep concern for United States Air Force housing at White's Point in San Pedro, California.

As an elected representative to the California State Assembly, since 1978, my district serves the San Pedro area where I was born and raised. I believe I can speak with some degree of certainty on the issues important to this area, including whether the Air Force should be permitted to site military housing at White's Point. My staff and I have reviewed the draft EIS dated April 1986, and my comments are as follows:

7 In my view, any development alternative which offers to sacrifice Bogdanovich Park is not consistent with the best interests of San Pedro. Not only is Bogdanovich Park a heavily used facility by the youth of our community, it is also a living memorial to Martin Bogdanovich and the great good he did for San Pedro. As the founder of Star-Kist Foods and the Yugoslav-American Club of San Pedro, he helped shape the early culture of the community.

Since the draft of EIS Alternatives B,C,D, and H propose to destroy Bogdanovich Park, I cannot support those. Alternatives E,F,G, and H also threaten Angel's Gate Cultural Center and the California Conservation Corps based there. I believe that as long as viable alternatives exist, those areas should not be encroached upon.

8 That leaves the preferred option (3-2, Figure 3.1-1) and Alternative A to be considered. In either case, I am pleased that more than half of the acreage at White's Point would remain as open space after construction of the much-needed Air Force housing.

I would also like to address the economic impact to our community should the

Air Force have to leave the South Bay and relocate to another area where land acquisition and housing are more affordable for the families of the men and women serving our vital defense interests.

The Space Division spends approximately 6.6 billion dollars annually in the Los Angeles Basin including 1.3 billion locally, accounting for about 100,000 jobs.

I would respectfully urge and support a compromise wherein we could maintain Bogdanovich Park in its present configuration and accommodate the needs of the United States Air Force on approximately 40 acres of White's Point Park.

Sincerely,

Gerald N. Felando

GERALD N. FELANDO

GNF/mb

COPY — HEARING OFFICER, DEIS FOR AF HOUSING, SAN PEDRO

SOUTH SHORES HOMEOWNERS' RESPONSE TO AIR FORCE DEIS

The South Shores Homeowners' Association would like to make some key observations in regard to the Air Force Draft Environmental Impact Statement on building officer housing at White Point Park.

What we note in reviewing the DEIS is that the Air Force has really not been listening to the views of the community in regard to new military housing in San Pedro. It appears that the Air Force is saying, in preparing the DEIS for its' housing development, that it knows what community planning is best for those of us living San Pedro.

We make this assessment on the Air Force's apparent views to community planning on the basis of at least six identifiable flaws we believe are contained in the DEIS. These flaws are as follows:

1. Statements made in the DEIS on the level of impact the proposed action of siting 170 housing units on 40 acres of land at White Point Park would have on the development of a regional state park.

2. Statements made in the DEIS that pass judgement on the merits of a state regional park being developed in the White Point Park area.

THESE ITEMS ARE COVERED IN COMMENT NUMBERS 9 THROUGH 16 THAT FOLLOW

3. Statements made in the DEIS that lessen the degree of objectivity that exists on the part of the Air Force in reviewing possible alternatives to the proposed action.

4. Apparent incorrect data in the DEIS on housing density that would be used for alternative Plan D (Los Angeles City Planning Office Proposed Siting Plan).

5. Omission of statements in the DEIS of community views made at the December hearing related to housing compatibility as it relates to the different alternatives under review.

6. Apparent limited scope of field contacts made among citizens not associated with public agencies or public utility agencies in the preparation of the DEIS.

Specific reasons (with reference to pages in the DEIS) for why we believe that these flaws reduce the creditibility of the Air Force DEIS are presented on the following pages.

Statements made in the DEIS on the level of impact the proposed action of siting 170 housing units on 40 acres of land at White Point Park would have on the development of a regional state park.

9

At the December hearing that began the DEIS process, some 31 speakers testified on the impact the proposed action would have on the development of a state regional park at White Point. There is little acknowledgement in the DEIS of the level of community interest for development of a state regional park, or the fact that state officials testified that the proposed action would eliminate interest by the state in developing Royal Palms Beach and White Point Park into a secured regional park.

10

The DEIS attempts to minimize the impact of the proposed action by stating that 124 acres will remain after removal of 40 acres for housing development. Therefore, park development can take place on this land by government agencies who wish to to so.

What has not been recognized by the Air Force is that local government agencies are unable to finance a fully secured coordinated park and beach complex at this time. The State of California is the only agency with the potential resources to do so. They will only seek action from the State Legislature to fund this type of project if there is adequate land to provide for buffering of homeowners and park users along with adequate space for vehicle parking. The removal of 34 per cent of the land area at White Point Park will disqualify the site for state park development.

Two years of hearings on the feasibility of developing a state park at White Point have resulted in strong support among community members. The concerns for overnight camping have been addressed by an agreement that there will be no more than 55 sites for such use at the park, and these sites will be located in the canyon area out of view of homeowners. Park officials have confirmed that there will be 24 hour security at this urban park.

Other comments in the DEIS refer to the current run down conditions that exist at both White Point Park and Bogdanovich Park noted when Air Force officials visited the two sites. It is these very conditions, along with public nuisance conditions at Royal Palms State Beach, that have generated strong support for park development by the State.

- -

See pages: Summary X, 1-16, 1-17, 1-23, 3-40, 4-112, 4-113, 5-82, 5-121, 5-132, 7-2, and 8-3.

Statements made in the DEIS that pass judgement on the merits of a state regional park being developed in the White Point Park area.

Several comments are made in DEIS passing judgement on the merits of having a state park in the community. These comments focus on the appearance of park users' vehicles at the park (as opposed to housing units), traffic impact in the area from park users, and the level of security that might be provided for the park area.

The presentation of crime statistics for both the area and what is experienced in state parks elsewhere is apparently presented to discredit local homeowner statements that there are serious public nuisance conditions at Royal Palms Beach, or the belief that a state park would be any better supervised than the current local beach now is for visitors.

The fact is that those who live there know what conditions exist there. Most family oriented visitors avoid the area on weekends when gang activity takes place. Several times a year large scale police activity takes place involving helicopters as well as ground personnel. Many criminal acts are never reported to the police. The beach area is isolated, and therefore a risk for patrol units when they are out of radio contact.

11

What is most shocking, however, is the fact that comments on the merits of a state park are in the DEIS. This report is designed to focus on the impact of housing on the area, not the impact of a state park on the area. The State of California will have to do its' own environmental assessment on any park development at White Point. In our judgement these comments on the merits of a state park are inappropriate for a study being made on military housing at White Point Park or other sites under consideration.

The fact that these comments exist in the DEIS gives the appearence that the Air Force wishes to argue against the community's defind wishes that a state park be developed in the area.

- -

See pages: 3-6, 3-44, 4-87, 5-82, 5-83, 5-118, and 5-119.

Statements made in the DEIS that lessen the degree of objectivity that exists on the part of the Air Force in reviewing possible alternatives to the proposed action.

In introducing possible alternatives to the proposed action of building housing at White Point Park, the DEIS presents disapproval by the Air Force of five of them. Alternatives D, E, F, G, and H are all disapproved by the Air Force.

12 There may be drawbacks on behalf of the Air Force on many of the alternatives presented, just as there may be drawbacks for the community. However, to cite disapproval of the alternatives presented at the beginning of the study diminishes the degree of objectivity the Air Force has to discussing them in the first place.

The Congressional action taken on October 10, 1984, states

> "If the Air Force is unable to resolve the issue regarding the proposed site, they should work with the city to find an alternative site."

13 The direction from Congress appears to say that the Air Force needs to negotiate with the city in good faith. Making statements of disapproval on the alternatives to be considered conflicts with a sincere effort by the Air Force to work for a solution to this issue.

- -

See pages: Summary V, 3-20, 3-27, 3-31.

Apparent incorrect information in the DEIS on housing density that would be used for Alternative Plan D (Los Angeles City Planning Department Siting Plan for the Department of Parks and Recreation)

14

The DEIS tables and statements related to the description and make-up of the different potential sites for housing include information on the number of housing units that will be built at any one location. Analysis on the potential impact of compatibility of the housing to homes around the respective sites being considered is in part based on the number of units planned for each buildable acre of land.

The data cited for Alternative D (Plan presented by the city of Los Angeles) in the DEIS states that 90 housing units are planned for White Point Park on nine acres of land, and 80 housing units are planned for Bogdanovich Park.

According to site plans presented to our organization by the city of Los Angeles, 60 housing units are sited at the eastern part of White Point Park, and 110 housing units are sited at Bogdanovich Park.

There is a significant difference in the density being considered, depending on what data is being used in the review process. The data shown in the city plan show that the average units planned for each acre average 6.6 units per acre (which is within the range of 2 to 7 units per acre required for R1-1XL property in the White Point residential area). The comments in the DEIS state that the density for White Point Park under Alternative D would be 10 units per acre (well above that permitted under current zoning practices for the surrounding area).

We are not aware of why there is a difference in the data being used for this Alternative from what has been presented to us and what was used to prepare the draft. We urge careful study of this difference, since this information is critical to evaluation of Alternative D in the planning process.

- -

See pages: Summary V, 3-20, 3-27.

Omission of statements in the DEIS that include information on community views presented at the December hearing that relate to housing compatibility between military housing and existing business and housing units in the White Point area.

15

In regard to evaluating what type of housing units are compatible with existing housing units and business units in the White Point area, the DEIS cites the views expressed in the 1982 Mayor's Advisory Committee, and those stated in the San Pedro and Peninsula Chamber of Commerce's original report on military housing at White Point Park.

There is no real recognition that the San Pedro and Peninsula Chamber of Commerce has revised its position on military housing in regard to where and how such housing should be built. This revised position was announced in January. On the matter of housing compatibility, the Chamber stated that this should be worked out between the city of Los Angeles and the Air Force.

The South Shores Homeowners' Association presented a written report at the hearing in December that stated that it is now more flexible on arrangements of attached and single-family housing units for military housing, depending on just what specific land locations are used for the building of the housing units. No mention of this position is included in the DEIS. Our original position (and that of the Mayor's Committee) was based on only Alternative A being considered in earlier efforts to build Air Force officer housing. That Alternative involves the most scenic area of land where some 50 homes and public viewing from 25th street and Western Avenue would be impacted by housing.

Alternatives that involve Bogdanovich Park would permit attached homes as well as single-family homes without impacting surrounding development. There is a shopping center and four-story retirement home next to that property. Former Navy housing on this property consisted of two-story housing units. U. S. Navy officer housing is across the street, and consists of both attached and single-family homes.

Some housing on the eastern end of White Point set back against the hillside, and built as attached units would not impact many homes in the area. There are only five homes on Weymouth Ave. impacted by the housing units, and they would be impacted by any homes built, regardless of the type of construction used for them.

- -

See pages: 3-40, 4-60, 5-68, 5-69, 5-70, 5-73, 5-74, 5-117, and 5-118.

Apparent limited scope of field contacts made among citizens not associated with public agencies, public utility agencies, or research organizations in the preparation of the DEIS.

A review of the contact sources used by those preparing the report shows that there were few contacts made of local citizens working or living in the immediate area for input while preparing the DEIS.

There was a contact made to an official of AYSO to discuss potential relocation problems for soccer play if Bogdanovich Park is converted into a site for military housing.

There was no contact noted in the sources list relating to immediate residents and business views on the proposed action or alternatives being reviewed. We must assume that this information then comes from oral testimony at the December hearing or correspondence that has been sent to the Air Force Station in El Segundo.

16

However, the DEIS raises key questions related to the creditibilty of the community on security at Royal Palms Beach, acceptable housing density in the areas being considered, state park development vs. local park development, and the impact on real estate values new housing will have, depending on its location and construction characteristics. Therefore, limited field contacts by those preparing the report, combined with little recognition of the level of concern expressed on the impact of housing on the development of a state park at the hearing in December, tend to lessen the creditibility of those evaluative statements made in the DEIS.

- -

See pages: 10-1, 10-2

CONCLUSION: In our judgement, the six flaws noted concerning the recognition of impact of housing on state park development, editorializing on other potential land uses, ruling out some alternatives before review and discussion, presenting apparent incorrect data on housing density, not recognizing community views on housing density, and making limited efforts to contact immediate homeowners, lessen the creditibility of the DEIS being considered a valid study for use in reaching a fair solution for both the Air Force and the community.

We suggest that the flaws noted be addressed before a final environmental impact statement is completed. These flaws should also be addressed if any meaningful discussions are to take place between the Air Force, the city of Los Angeles, and officials from the state park system.

Statement for E.I.S. hearing on proposed Air Force housing

I submitted a detailed letter at the scoping session. Now I have reviewed the Draft and choose to limit my comments to a specific omission in the consideration of alternatives:

17

A more viable alternative for the Upper Reservation would be to begin by considering a buildable area of approximately 36 acres, including the old buildings immediately north of Korean Bell parking lot, plus all the area of batteries Leary and Merriam and the hillslope through which the presently unused Barlow-Saxton Road passes on the extreme northern end of the upper fort property.

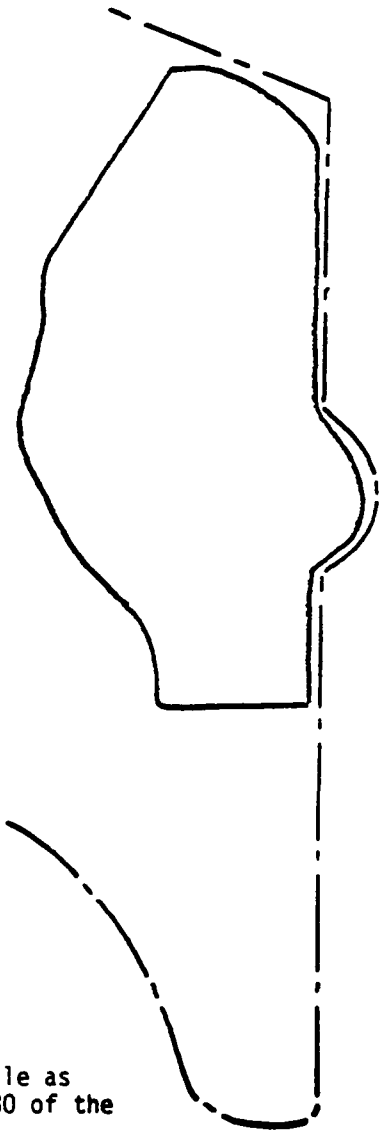
Planning should include rerouting the existing roads, which would allow more buildable acreage: a further alternative would be the use of the site of the Gaffey Pool and relocation of the pool to the future vicinity of the planned Hostel immediately west and below the Korean Bell.

Dismissing the even smaller portion of the upper fort because of demolition costs appears to me to be an inadequate, ill-considered conclusion. substantial demolition costs will be incurred elsewhere, for example at the Nike Site, and a detailed study of comparable demolition costs should be a component of the consideration of alternate sites in the supplementary study needed to provide an acceptable environmental impact statement.

A sketch map, which is adapted from site layouts in the draft E.I.S., is provided at the right.

G.L.S.

Gregory L. Smith
3915 Carolina Street
San Pedro, California
90731



Same scale as page 3-30 of the D.E.I.S.

SD/DEV
Mr Bob Mason
P.O. Box 92960
Los Angeles Ca. 90009-2960

4-22-96

(1)

Dear Sir.

I have lived in San Pedro ever since getting out of the Navy in 1919. Am now 96 years. Have seen this town become a beautiful, healthy city, without the help of these ego showing individuals, clubs and associations, which are now against everything for improving the city still more, and are against any accomodations for our armed forces. For the life of me, I fail to understand, when the government has the right to take back the unimproved land, it has to listen to these ten horn politicians, individuals and organizations.

18 The suggestion by this Flores woman to take Bagdonovich park and a part of White Point, is ridiculous, by her stipulation that the Air Force must make available the playing fields at another location at their expense.

19 I have read the copy of the A.E.I.S. thru and am now more disgusted than ever, to think our government officials have to go thru the hassle to get its land back.

I have been exercising my dogs alongside the car for over 12 years at the White Point enclosure, and tho I know I will loose that privilege, I hope & pray, the 170 homes will be built on that property.

20 Regarding the Table 4-11-3 Page 4-86. I don't know anything about the 1950s doings. For when I started exercising my dogs there alongside the supposedly landfill, it was a 50 yd wide 40 ft deep canyon from the battery down to the trap & field range. It was a hard ground canyon, soon used by the Dept of Recreation & Park Dept for their dump.

(3)

first for short telephone poles, concrete floors and later for tree trimmings and all kinds of rubbish. After my twice complaining to the Sun Town folks about the rat infestation they partially discovered the mess. When they started dumping again, I complained again and they finally stopped.
When there was a grass fire there, the Fire Dept did did a better job of covering the remaining rubbish some of which had partially burned.

Regarding N-8-1 (47) it is a gross misrepresentation of numbers. I have been down there many times and it would take a lot of imagination to count even 50, except maybe Saturday + Sundays, and nights when they could maybe count to several hundreds.

21 Many nights during that time and now there are more minority visitors than during the daytimes. They always raise hell in general by drinking, distressing, rowdyism & including gang fights + stabings, to which the Police have to be called to get them off the property (late closing time) Just this last weekend there were 2 stabings again.

I am sorry that I do not own a typewriter but I hope somebody will be able to read this

Sincerely
Sh Fred Heilig
1820 So. Mantis Ave
San Pedro Ca 90732

Typewritten Translation of Fred Heilig

SD/DEV
Mr. Bob Mason
P.O. Box 92960
Los Angeles Ca. 90009-2960

Dear Sir:

I have lived in San Pedro ever since getting out of the Navy in 1919. (not legible) 90 years. Have seen this town become a beautiful, healthy city, without the help of these ego showing individuals, clubs and associations, which are now against everything for improving the city still more, and are against any accomodations for our armed forces. For the life of me, I fail to understand, when the government has the right to take back the unimproved land, it has to listen to these tin horn politicians, individuals and organizations. The suggestion by this Flores women to take Bagdonovich park and a part of White Point, is rediculous (sic), by her stipulation that the Air Force must make available the playing fields at another location at their expense.

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I am sorry that I do not own a typewriter but I hope somebody will be able to read this.

Sincerely,
Fred Heilig
1820 So Mantis Ave
San Pedro Ca 90732

4/22/86

Col Rodgers

22 After I spoke, you explicitly asked if anyone had an alternative to the White Point et al site. ~~I~~ I'm requesting you permit me ~~to~~ (and others) to do that by extending the very short comment period on the draft EIS.

Vince
Budrovich
(213) 514-8878

Attached is the map I referred to in my presentation.

Typewritten Translation of Vince Budrovich

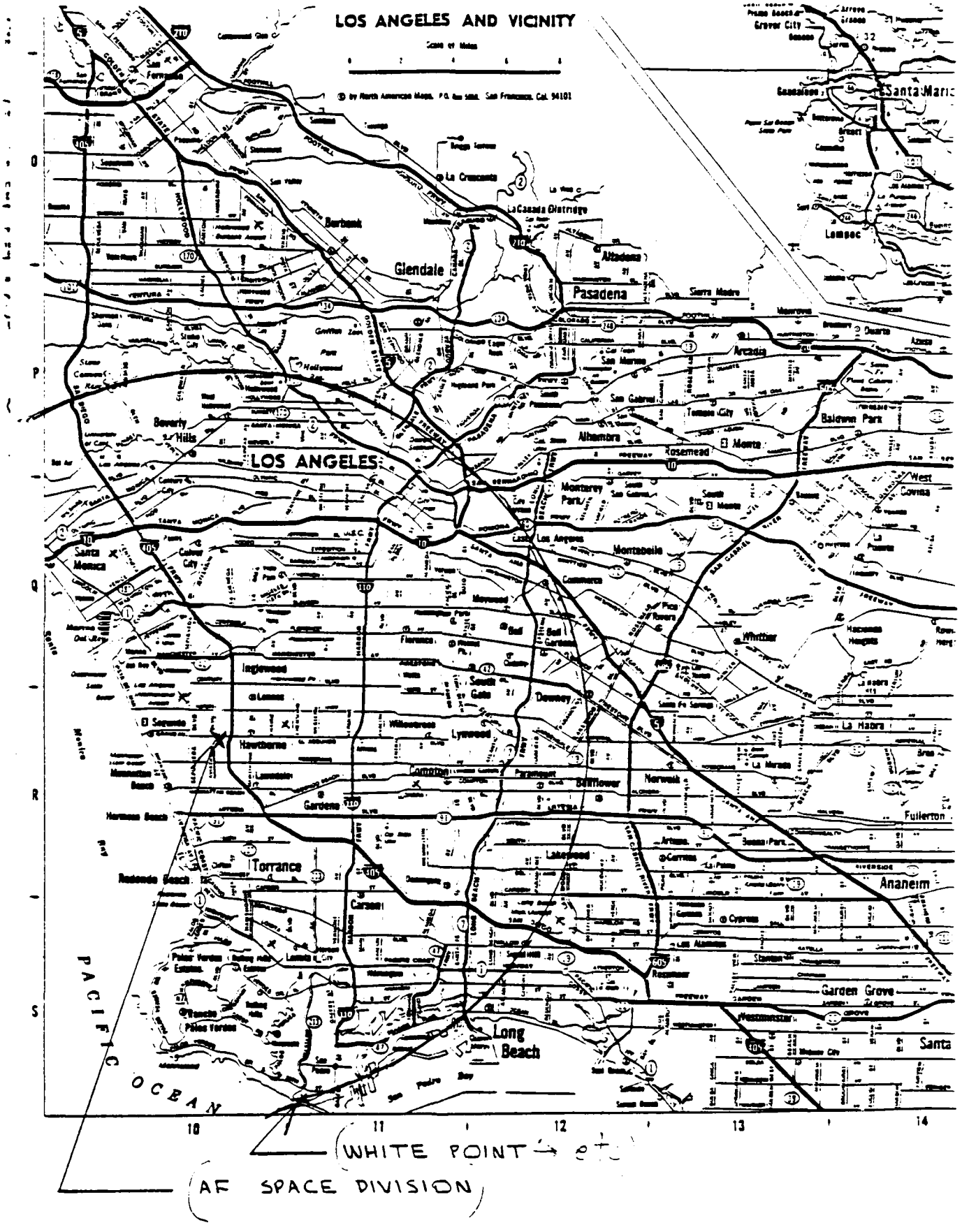
4/22/86

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Vince
Budrovich
(213) 514-8878

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LOS ANGELES AND VICINITY
LOS ANGELES
Glendale
Pasadena
Burbank
Beverly Hills
Santa Monica
Torrance
Long Beach
Inglewood
Hawthorne
Gardena
Carson
Compton
Lynwood
Downey
Whittier
Norwalk
Fullerton
Anaheim
Garden Grove
Santa Ana
Monterey Park
Alhambra
Rosemead
Arcadia
Monrovia
Baldwin Park
West Covina
Montebello
Lakewood
Palos Verdes Estates
Rancho Palos Verdes
Rolling Hills
Redondo Beach
Hermosa Beach
Manhattan Beach
El Segundo
Culver City
Lomita
Torrance
PACIFIC OCEAN
WHITE POINT
AF SPACE DIVISION
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Q
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S

SIERRA CLUB
Palos Verdes - South Bay Group / Angeles Chapter

April 22, 1986

My name is Alfred Sattler. As Chair of the Palos Verdes/South Bay Group of the Sierra Club, I am here to speak for the 4000 members who live in the Palos Verdes/South Bay area, including more than 300 in San Pedro. The Sierra Club has a long-standing commitment to the preservation of coastal areas for public use and enjoyment.

The Draft Environmental Impact Statement on Air Force Housing at White Point is deficient because it seriously neglects the most important issue, the removal of the possibility of a State Park at White Point.

Senator Robert Beverly, who represents this area, authored Senate Concurrent Resolution #9, calling for a feasibility study for a State Park at White Point. To quote from the Resolution, "The White Point property, adjacent to Royal Palms State Beach in Los Angeles County, because of its location in a densely populated urban area and on a scenic bluff overlooking the Pacific Ocean and Catalina Island, presents a site that is ideally suited to park purposes." A public hearing on the State Park proposal attracted a crowd which was strongly in favor of the idea.

23

Officials of the California Department of Parks and Recreation have been quite enthusiastic about the possibility of a park here, but have warned that if substantial amounts of the land were lost to housing, there would not be a large enough parcel to make a State Park feasible. Taking away 40 acres of White Point reportedly is enough to make a State Park infeasible.

The Environmental Impact Statement for the Air Force's preferred development plan should discuss the elimination of a State Park and all that it could be. In terms of wildlife habitat, White Point is presently far from barren. It provides space for owls, kestrels, black-shouldered kites, and a variety of smaller birds, and the seeds, insects and small rodents which they feed upon. If sensitively restored to native vegetation, the wildlife habitat would be much richer. A State Park at White Point would also provide numerous recreational and educational opportunities, especially hiking, nature observation, and spiritual renovation.

P O Box 2464 • Palos Verdes Peninsula, California 90274

24 The Air Force has been trying to build housing at White Point for several years now. The reason that White Point appears to them as the best location is that their requirements for housing are overly restrictive and that they are not considering any possible negative side effects, such as elimination of a park. The requirement that "the property must be large enough to accomodate 170 single family houses" is especially restrictive. Except for ease of administration, there seems to be no good reason why 170 units of housing could not be spread around the Los Angeles basin in groups of 20 to 40 units each. If Air Force personnel are presently living "in ninety communities and three counties, some commuting up to two hours each way," then this will clearly be a better situation.

25 The condition that "no purchase of property was allowed, i.e., the property had to be either federally owned or recoverable" is also unduly restrictive. The Environmental Impact Statement will be deficient if it does not consider other alternatives.

26 Constructing housing at any of the primary locations proposed in this document is going to have a significant adverse impact on the resources available to the community of San Pedro, and in some cases, to the people of greater Los Angeles. The Environmental Impact Statement should examine the costs of mitigating the impact to the local community of development at the various locations considered, whether building replacement soccer fields on city land, replacing the park value of White Point, or whatever is appropriate.

Sincerely,

Alfred Sattler

Alfred Sattler
Chair

BARBIERI INTERNATIONAL
2022 SOUTH MESA STREET
SAN PEDRO, CALIFORNIA 90731
(213) 548-8535

April 24, 1986

Mr. Robert Mason
U.S. Air Force
Space Division
P.O. Box 92960
Los Angeles, California
90009-2960

Subject: Air Force Housing at White's Point
Draft Environmental Impact Statement

Dear Mr. Mason:

I wish to present my comments on the draft Environmental Impact Statement for the proposed construction of 170 Air Force single-family homes in San Pedro. Having lived and worked in San Pedro nearly all of my life, I believe I am well-qualified to address potential impacts on the environment of the area.

I support the preferred alternative offered in the draft EIS as the best alternative for the San Pedro community and the Air Force. I believe this alternative offers a fair balance of creating much needed housing and preserving open space and existing public recreational facilities. I personally believe it is unnecessary to disrupt the on-going recreational and athletic use of Bogdanovich Park in order to accommodate Air Force housing in San Pedro. And, as an American of Yugoslav descent, I do not believe we should desecrate the living memorial to one of San Pedro's most distinguished pioneers, the late Martin Bogdanovich.

I believe that the proposal to build on 40 acres of White's Point is a prudent one. Over half of the remaining acreage at White's Point will be maintained as open space. The mission of the Air Force is an important one, and they should have decent housing for their officers and personnel. I have no objection whatsoever to the Air Force presence in our community. In fact, the Air Force has in many ways enriched our community life. This, combined with the prospect of leaving Bogdanovich Park intact, argues for quick acceptance of the Air Force preferred alternative.

My home overlooks the existing Air Force housing in San Pedro. The Air Force community is well-maintained and well-protected, unlike maintenance practices at most State and City Parks I've visited. As a resident of Pt. Fermin in San Pedro, I adamantly oppose a State Park at White's Point.

Finally, too often when addressing environmental concerns there is failure to consider the Homo sapiens as a part of the environment. The Air Force provides tens of thousands of jobs throughout the Los Angeles Harbor Area. The lives of the young men and women in our armed forces, including their need for adequate housing, should be the overriding factor in any true environmental assessment.

With kindest regards.

Sincerely,

John M. Barbieri

STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor

CALIFORNIA COASTAL COMMISSION
631 HOWARD STREET, 4 FLOOR
SAN FRANCISCO, CA 94105
(415) 543-8555

April 28, 1986

Colonel Raymond E. Rogers, Jr.
Department of the Air Force
Los Angeles Air Force Station
P. O. Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960

Subject: Draft Environmental Impact Statement on military housing at White Point

Dear Colonel Rogers:

The following are comments by the Coastal Commission staff on the draft EIS for White Point. Because this matter also involves a consistency determination and hearing before the Commission, we have already discussed these comments with your staff as part of the coordination that is part of the consistency process.

27 We believe the analysis of alternatives in the draft EIS is seriously flawed. Rather than systematically evaluating projected alternatives, the analysis is of limited scope and appears to serve mainly as a rationalization for the previous decision to re-acquire White Point. There is virtually no analysis of the alternative of using the existing practice of a special allowance for housing.

28 Alternative densities for housing are not considered. This latter flaw is particularly glaring as the EIS does not even present the site plan that the Air Force proposes (although the Air Force has referred to site plans in meetings with our staff). The EIS simply states, "Conceptual siting plans and engineering designs have not been developed for the proposed action." (Page 3-1.)

29 To bolster the choice of White Point for a low density housing project, the EIS gives inordinate weight to surrounding development rather than surrounding zoning as the standard for determining density.

30 The EIS fails to evaluate in any substantial detail the alternative specifically suggested by the City of Los Angeles for clustered development on White Point and Bogdanovich Park. Instead, the EIS concludes that, "The USAF does not concur with this proposal [a higher density, clustered development] as the 9 acres is not sufficient for a housing density compatible with the surrounding residential development (across Weymouth Ave.)." (Page 3-27.)

31 However, existing zoning allows a substantially higher density than is proposed by the Air Force. Indeed, when other surrounding development is examined - particularly the density of the nearby Navy officer housing - it seems clear that the Air Force has used the density of surrounding housing selectively to support their previous decision to locate housing at White Point.

32 It is imperative that alternative configurations of development be systematically examined in the EIS in order to enable a reasoned basis for decision. NEPA allows nothing less. Of course, in order to provide such an analysis, the Air Force must reveal its preliminary development configurations as well as the design assumptions which underlie critical conclusions about what can and cannot be built. Instead, the EIS offers only conclusions about some key issues. For example, the EIS simply concludes that the Bogdanovich Park site is suitable for only 90 units, with the density of selectively considered surrounding development the only rationale for that conclusion. In fact, substantially more units could be site on Bogdanovich consistent with the zoning of adjacent land. Existing zoning immediately west of Bogdanovich Park is RD2, which allows up to 12 units per acre. Staff from the City of Los Angeles has indicated that such density would be suitable for a housing development at the park. At such an intensity, the 22 acres of Bogdanovich Park could easily accommodate 170 units. Alternatively, the lowest intensity zoning surrounding Bogdanovich allows up to seven units per acre based on overall acreage. This would allow 154 units at Bogdanovich, and leave only 16 units to be located elsewhere.

33

34

Even if the Air Force wants to limit development entirely to detached single-family structures with fairly large lots, substantially more development could be placed at Bogdanovich than indicated in the EIS. If the inherent design assumption used by the Air Force is that all development must be entirely detached single-family dwellings, more than 90 units could be developed at Bogdanovich under a number of different configurations. If the lot size were 5000 sq. ft. (100 ft. by 50 ft.), if only 16 acres of the site are flat enough to develop and about 1/3 of the site is used for roads and utilities, 104 lots could still be developed (4.7 units per acre). More lots could be accommodated with more modest lot sizes. For example 137 lots measuring 95 ft. by 40 ft. could be developed (6.2 units per acre). All of these lots could be developed with single-story structures of the Air Force's minimum square footage and still leave substantial room for yards.

35

36 Mixed use development would allow even greater flexibility to reflect the different grades of the officers to be housed. The adjacent Navy officer housing has a density of 5.6 units per acre in a mixed use configuration. At this density, Bogdanovich Park could accommodate 123 units, leaving only 47 units to be sited elsewhere. If those 47 units were to be sited at White Point, as proposed by the City, they could be located on the 9 acres suggested by the City of Los Angeles at a density of 5.2 units per acre. In short, Bogdanovich Park can easily accommodate more than 90 units. The EIS fails to either establish a compelling basis for the selected density or to evaluate alternative densities. Given the earlier direction of the Coastal Commission to consider alternative sites and intensities, and given the proposal of the City for 170 units in a specific configuration at Bogdanovich and White Point, the failure of the EIS to analyze possible development configurations is a serious and inexcusable flaw. In light of this background, the

37

38 level of analysis in the EIS does not provide any basis for concluding that the proposed alternative is the least environmentally damaging feasible alternative.

The level of analysis given other alternatives is similarly circumscribed, and again appears to serve mainly to justify a decision rather than evaluate possibilities. For example, Fort MacArthur is rejected as a potential site for housing based on the added cost of demolishing existing buildings, but that cost of demolition is not provided to support that conclusion. The analysis of continued use of the housing allowance and the existing housing stock is similarly limited. In its consistency determination review, the Commission concluded that the housing allowance and tax benefits of home ownership made purchase of homes a possible feasible option for military officers, particularly when the benefits of accumulating equity are considered. Typical monthly rental prices are below mortgage costs. Since that time, mortgage rates have dropped, improving the feasibility of purchase. Yet the EIS includes no analysis of home ownership or rental using existing housing stock. Further, the consideration of alternative sites is limited to those already in Federal ownership, substantially

39 curtailing the scope of alternative analysis. The EIS offers only

40 simple conclusionary statements, and these are not sufficient to demonstrate that the favored project is the least environmentally damaging feasible alternative.

In responding to the issue of the proposed project's impact on recreational values and potential at White Point, the EIS fails

41 completely. It appears that the drafters either fail to comprehend the nature of the issue or decline to join it. Instead, they argue extensively that the loss of 40 acres at White Point should not prevent development of a park there because smaller State parks exist within the State Park system. This implies that size is the critical criterion in determining the recreational potential of the

42 site. The argument completely ignores the importance of the vistas offered by the site. Presently, from the slopes of the bowl-like setting of the site, the visual experience is of an undeveloped rather than urban area. For such a site to exist in the midst of a heavily urbanized area is a rare opportunity for recreation. Yet this central value of the recreational site goes unrecognized in the EIS and the impacts of development on the visual values of the

43 setting are not discussed. The limited analysis of visual impact that is included in the EIS is oriented towards the impact on surrounding residential areas, and implies that residential development and park facilities will have similar visual impact. Such tools of analysis as cross sections and photographs are needed to sustain this argument. The location of the proposed 40 acres to be re-acquired spills across virtually the entire viewshed of the remainder of White Point. It is our conclusion after examining

44 topographic maps of the site carefully that development as presently proposed would destroy the experience of an open, undeveloped area from virtually all remaining areas. It is this impact which diminishes if not destroys the site's potential as a State Park.

As these comments make clear, we think that the draft EIS has fundamental shortcomings. The study fails to evaluate alternatives that have been suggested over the past 18 months. It fails to acknowlede key adverse impacts. It relies on conclusions rather than analysis to dismiss what appear to be valid alternatives. Given the controversy that has surrounded this project, and the fact that meaningful compromise between the City and the Air Force appeared to be within reach, it is distressing to find that the EIS is more a justification document than a full disclosure document that might provide the tools to resolve the dispute. That analysis is still needed. We look forward to an extensively revised EIS that will comply with the requirements of NEPA.

45

Very truly yours,

Peter Douglas
Executive Director

Mayor DOUGLAS M HINCHLIFFE
Mayor Pro Tem MELVIN W HUGHES
Councilwoman JACKI BACHARACH
Councilman JOHN C McTAGGART
Councilman ROBERT E RYAN
City Manager DONALD F GULUZZY

RANCHO PALOS VERDES

April 29, 1986

Mr. Robert Mason
Department of the Air Force
Space Division - Housing Project DEV
P. O. Box 92960
Los Angeles, California 90009-2960

Dear Mr. Mason:

The City Council of the City of Rancho Palos Verdes wishes to express its opposition to the proposed construction of 170 single family houses for personnel stationed at the Los Angeles Air Force Station. This housing is proposed to be built on 40 acres at White Point.

Since 1984, the City has been very active in opposing this proposal. White Point lies directly adjacent to our City along the Palos Verdes Peninsula coastline. Our City has long taken an active stand on the issue of coastal preservation and the White Point site is no exception. It is a magnificient site with a rich historical background, outstanding environmental qualities, panoramic vistas and limitless recreational potential. We believe that development of White Point as a recreational site provides the State, Federal and local agencies an outstanding opportunity to show the Los Angeles public that they take a similar stand on this issue. Equally important, White Point Park would provide California, Los Angeles and Peninsula area residents with much needed recreational opportunities. Use of the site for other than open-space recreational purposes would destroy White Point's rich historic, environmental and recreational value.

46

Please consider the concerns of the residents of the City of Rancho Palos Verdes and take whatever action is within your authority to guarantee recreational development of White Point.

Very truly yours,

Douglas M. Hinchliffe
Mayor

DH:CC:bu

30940 HAWTHORNE BOULEVARD RANCHO PALOS VERDES CA 90274 213 377-0360

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 Capitol Mall, Room 288
Sacramento, California 95814

(916) 322-7791

1 May 1986

Robert C. Mason
U. S. Department of the Air Force
Hq. SD/DEV, P.O. Box 92960
Los Angeles, CA 90009-2960

Re: Air Force Space Division Housing Project - White Point
SCH #85112709

Dear Mr. Mason:

Given the manner in which the Commission receives Draft EIS and Draft/Final/Supplemental/Subsequent EIR notices, unless the actual report is forwarded us directly it is not reviewed. The Commission's response is to a one page notice of intent from the State Clearing House. Thus, if you have already solicited and subsequently incorporated Native American concerns into your mitigation measures (inclusive of monitoring grading), please disregard this letter and accept our appreciation for ensuring that the local Native American community is afforded the opportunity for participation in the environmental report/review process.

47 The Commission recognizes it is standard procedure that an archaeologist be involved in the planning and implementation of any mitigation program; however, we encourage consultation with the local Native American community as well. Since the cultural heritage of Native Americans is under examination, it is only appropriate their assistance is sought as an aid in the reduction/avoidance of adverse impacts to archaeological/ethnographic sites maintaining sacred or religious value (pursuant to the Public Resources Code Section 5097.9 et seq).

Enclosed, please find a list(s) providing the name and address of your regional Commissioner and the Native Americans from whom you may seek advice, guidance, and consultation with respect to your project. Please be advised that the enclosure(s) is furnished as a measure for ensuring that the concerns of the local Native American community are addressed and, therefore, is not for public disclosure.

Please keep us apprised of the progress of the above referenced project.

Respectfully yours,

R. Paige Talley
Special Assistant

Enclosure(s)
RPT:gt

Los Angeles Unified School District

BUILDING SERVICES DIVISION

HARRY HANDLER
Superintendent of Schools

BYRON L. KIMBALL
Director

MEL ROSS
Deputy Director

ROBERT J. NICCUM
Chief Realty Agent
Real Estate Branch

May 2, 1986

Robert Mason
HQ Space Division/DEV
P.O. Box 92960
Worldway Postal Center
Los Angeles, California 90009-2960

Dear Mr. Mason:

Re: Draft Environmental Impact Statement
Air Force, Space Division Housing Project
San Pedro, California

I have reviewed the above-referenced Draft Environmental Impact Statement (EIS) and have the following comments to make on behalf of the Los Angeles Unified School District.

We cannot agree with the statement on page 5-80 of the EIS that "the current school system can absorb the children generated by the project." While enrollment at White Point Elementary School is currently below the school's two-semester capacity, the school is projected to be operating nearly at capacity next year. Enrollment is projected to exceed capacity in succeeding years. Employing the pupil generation ratios in the EIS, we find that the implementation of the project will escalate enrollment at White Point to more than 108% of capacity.

48

The School District is already being affected by a previous Air Force project providing housing at Fort MacArthur, which has made it necessary for the School District to transport a substantial number of pupils at considerable expense, since no space is available at the nearest school.

Furthermore, defining school's capacity is not as simple as counting seats and pupils. Under the court-mandated integration program, the capacity of a school to receive additional students is partly a function of the ethnic balance in the school. Therefore, even though it appears from a cursory view that the Air Force project will not cause enrollments to exceed capacities at Dana Junior High School or San Pedro High School, such a conclusion cannot be drawn without deeper analysis.

BUSINESS SERVICES CENTER: 1425 South San Pedro St., Los Angeles, CA • MAILING ADDRESS: Box 2298, Room 101, Los Angeles, CA 90051 • Telephone: 213/742-7581

Because the project's impact on schools may be much more profound than that described in the EIR, it is essential that the Air Force analyze the issues of capacity, enrollment trends, and ethnicity before reaching a conclusion on this subject. In addition, the EIS should incorporate mitigation measures for any impacts found to be significant. Kathryn Friedman, Principal Realty Agent, will be available to coordinate the assembling of school data needed by the preparer of the EIS. She can be reached at (213) 742-7581.

Thank you for the opportunity to review the Draft EIS. I would appreciate receiving a copy of the final document when it becomes available.

Very truly yours,

Robert J. Niccum
Chief Realty Agent
California Environmental
Quality Act Officer

RJN:br

cc: Byron Kimball
Max Barney
James Whithorne

May 4, 1996

Dept of the Air Force
SD/Dev
P.O. Box 92960
Los Angeles, Ca. 90009-2960
Attn Mr Bob Tipsan

Dear Sir:

Relative to our receipt of the Air Force Draft Environmental Impact Statement (DEIS), we were unable to attend the public hearing regarding same on April 22, 1996.

However, after review of the DEIS we wish to reaffirm our positive position for the Air Force proposed housing at White Point, in San Pedro.

In light of the many problems a State park may create and bring into San Pedro and our area, we still feel the area

would benefit from the military housing. The greatest asset would be the residents of the development — concerned citizens who will have found appreciate their surroundings and participate in local activities for the duration of their assignments.

We frequently use Pacific Ave in San Pedro and find no noticeable traffic increase or problem with the new housing there. We notice also the continuous improvement of the older portion of the Ft. MacArthur facilities. As the foliage grows in the new development it is becoming most attractive.

We further do not believe Bogdanovich Park should be disrupted as it now stands and all of the proposed housing should be on the one site at White Point. If for no other reason, this seems fiscally prudent to use only one site.

Thank you and your staff for so willingly working with the residents of our area who are not [illegible]

opposed to the Air Force housing plan as the local newspaper the "San Pedro News Pilot" attempted to portray in the article they printed regarding their coverage of the April 22nd Meeting. Those voices you loudly hear are organized special interest group, it appears to us, and do not necessarily represent the feeling of the neighborhoods most concerned. Unfortunately, many people do not express their views at the hearing or in correspondence, or to their politicians.

Best of luck on this project.

Sincerely,

Mr. and Mrs. Charles E. Gay
976 W. 37th St.
San Pedro, Ca 90731

Typewritten Translation of Mr. and Mrs. Charles E. Gay

May 4, 1986

Dept. of the Air Force
SD/DEV
P.O. Box 92960
Los Angeles, Ca. 90009-2960
Attn: Mr. Bob Mason

Dear Sir:

Relative to our receipt of the Air Force Draft Environmental Impact Statement (DEIS), we were unable to attend the public hearing regarding same on April 22, 1986.

However, after review of the DEIS we wish to reaffirm our positive position for the Air Force proposed housing at White Point, in San Pedro.

In light of the many problems a state park may create and bring into San Pedro and our area, we still feel the area would benefit from the military housing. The greatest asset would be the residents of the development--concerned citizens who we have found appreciate their surroundings and participate in local activities for the duration of their assignments.

We frequently use Pacific Ave in San Pedro and find no noticeable traffic increase or problem with the new housing there. We notice also the continuous improvement of the older portion of the Ft. MacArthur facilities. As the foliage grows in the new development it is becoming most attractive.

We further do not believe Bogdanovich Park should be disrupted as it now stands and all of the proposed housing should be on the one site at White Point. If for no other reason, this seems financially precedent to use only one site.

Thank you and your staff for so willinglly (sic) working with the residents of our area who are <u>not</u> predominately (sic) oppposed to the Air Force housing plan as the local newspaper, the San Pedro News Pilot attempted to portray in the article they printed regarding their coverage of the April 22 Meeting. Those voices you loudly hear are organized special interest group, it appears to us, and do not necessarily represent the feeling of the neighborhoods most concerned. Unfortunately, many people do not express their views at the hearing or in correpsondence, or to their politicians.

Best of luck on this project.

Sincerely,
Mr. and Mrs. Charles E. Gay
976 W. 37th St.
San Pedro, Ca. 90731

2524 Grayley Av
San Pedro, Ca 90732
May 9, 1986

MR. Robert Mason
149 Space Division/DEV
PO Box 92960
Walkway Postal Center
Los Angeles Ca 90009-2960

Dear Sir

I am a resident of South Shores which is adjacent to the proposed White Point Air Force housing area.

Although many groups in the area are opposed, I for one approve of the proposal that the 170 housing units be built. Air Force families deserve decent housing and Im sure the caliber of the personnel and their dependents will only be an asset to the community.

Very truly yours,
Lawrence R. Gallogher

Typewritten Translation of Lawrencr R. Gallogher

2524 Gra sley Av
San Pedro, Ca 90732
May 9, 1986

Mr. Robert Mason
149 Space Division/DEV
P.O. Box 92960
Walkway Postal Center
Los Angeles Ca 90009-2960

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Very truly yours,
Lawrence R. Gallogher

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

Attn; Mr Mason;

I,comming from a pioneer Japanese family, born and raised at White Point, I am in support of a State Park, Not for Military housing.

49 | we have the only rare coastal area here at White point that brings people from all our surrounding towns to view.

50 | The Historical surrounding that the Japanese has left, The top part is as important as the bottom part and cutting and leveling the hill for military housing will leave nothing of the historical background.

51 | A State Park at White Point, will benifit to all,We need the recreation for our future generation as well as us today.

No Military housing!!!!!!!!!!

THANK YOU
A CONCERN CITIZEN

Sumi Seki
NAME (PRINT)

3625 Caspian Ave
STREET ADDRESS

Long Beach, CA 90810
CITY, STATE ZIP CODE

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Reply to: 730 Simms Street, Room 450
Golden, Colorado 80401

May 12, 1986

Colonel Raymond E. Rodgers, Jr.
Director of Acquisition, Civil Engineering
Department of the Air Force
Headquarters Space Division (AFSC)
Los Angeles Air Force Station
P.O. Box 92960 Worldway Postal Center
Los Angeles, CA 90009-2960

REF: Draft Environmental Impact Statement, Air Force,
Space Division Housing Project, San Pedro, California

Dear Colonel Rodgers:

52 The Council has reviewed the draft environmental impact statement referenced above, which was circulated for comment pursuant to Section 102 (2)(c) of the National Environmental Policy Act. Please note that circulation of a draft environmental impact statement does not fulfill your agency's responsibilities under Section 106 of the National Historic Preservation Act of 1966.

Prior to the approval of the expenditure of any Federal funds or prior to the granting of any license, permit, or other approval for an undertaking, Federal agencies must afford the Council an opportunity to comment on the effect of the undertaking on properties included in or eligible for inclusion in the National Register of Historic Places in accordance with the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800). Until these requirements are met, the Council considers the draft environmental impact statement incomplete in its treatment of historical, archeological, architectural, and cultural resources. The method outlined in 36 CFR Part 800.3 describes the process by which NEPA and Section 106 compliance may be coordinated. Any substantive comments should then be incorporated into documents prepared to meet requirements under the National Environmental Policy Act.

53

If you have further questions or require the Council's assistance, please telephone Sheila Stump at (303) 236-2682 (commercial) or 776-2682 (FTS).

Sincerely,

Robert Fink
Chief, Western Division
of Project Review

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA

(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

I am disturbed at the plan to use the lower 40 acres to build Air Force Housing. As you already know, this comprises the area adjacent to Paseo del Mar & about Royal Palms. It is a unique piece of property which should be used for everybody. Air Force housing is found in many "off limits" to the locals.

54 I garden @ White Point and enjoy the beautiful vistas, the wildlife and fresh air. We have a copy of the Environmental Impact

55 Analysis and must tell you that the wildlife is much more diverse than your observers recorded. It is a treat to watch the various species of birds and animals! It should be open park land, for everyone to enjoy.

Housing along 37th Street would be

56 more acceptable in that it is next to existing military housing. Part of Bay Harbor is opened and has a wonderful view also. The upper recreation (above my house) has much empty space that could be developed.

I work and live in this community and would like to see a natural - type of preserve on this spot. It really is a unique spot - you see for yourself!

John & Judy Kordick

NAME (PRINT)

1014 - 37th

STREET ADDRESS

San Pedro, Ca 90731

CITY, STATE ZIP CODE

Typewritten Translation of John & Judy Kordich

I am disturbed at the plan to use the lower 40 acres to build Air Force Housing. As you already know, this comprises the area adjacent to Paseo Del Mar & also to Royal Palms. It is a unique price of property which should be used for everybody. Air Force Housing is fenced & very much "off limits" to the locals.

I garden @ White Point and enjoy the beautiful vistas, the wildlife and fresh air. We have a copy of the Environmental Impact Analysis and must tell you that the wildlife is much more diverse than your observers recorded. It is a treat to watch the various species of birds and animals! It should be open park land, for everyone to enjoy.

Housing along 25th Street would be more acceptable in that it is next to existing military housing. Part of Bogdonovich is open land and has a wonderful view also. The upper renovation (above my house) has much empty space that could be developed.

I work and live in this community and would like to see a natural-type of preserve on this spot. It really is a unique spot--go see for yourself!

John & Judy Kordich
1014-37th
San Pedro, Ca 90731

Progressive Democratic Club
C/O Lilio E. Gattoni, President
P.O. Box 492
San Pedro, CA 90733

May 13, 1986

HQ Space Division/D.E.V.
P.O. Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960

Attention: Robert Mason

Sirs:

At its last regular monthly membership meeting last Sunday, the Progressive Democratic Club voted unanimously that the White Point, Bogdanovich Park, and other such San Pedro areas, be preserved for parks, exclusively, so that these few remaining choice coastal land parcels with such appreciable recreational potential be available to all segments of the population instead of only to a small particular segment: the military - important as it is.

57 A possible solution: Assuming that the Air Force already has sufficient funds for housing construction, it should return to the Congress, and merely request additional funds for the acquisition of such land parcels that meet all of its selection criteria - perhaps even better than those areas now under consideration - and, thereby spare these future park areas.

This would be a win-win situation, wherein the Air Force and the rest of the society, each comes away with what they need for their well-being, if not survival.

Sincerely,

Lilio E. Gattoni 5-13-86

CC: Mayor of Los Angeles, Tom Bradley
Councilwoman (15th District) Joan Milke Flores
Los Angeles County Supervisor (4th District) Deane Dana
All State Legislators (both State Senators and Assemblymen whose districts are in Los Angeles County)
All Members of the U.S. House of Representatives whose districts are in Los Angeles County
U.S. Senators Alan Cranston and Pete Wilson

Eva L. Kowalski
1700 - Miracosta
San Pedro, California 90732
13 May 1986

SD/DEV
Bob Mason
Los Angeles, Ca.

Dear Mr. Mason:

Regarding White Point - please listen and hear. We have so little land left un-tilled and un-housed, that we implore all to leave it alone. Army housing can be put on a less important native land. We need it for a park, or just as it is -

Last year I wrote to several of our elected officials and several Air Force people and felt we had no chance whatever - maybe we do, and for that reason I write once again

Let us in San Pedro have that piece of nature to pass on to our descendants. It is important!

Yours,
Eva L. Kowalski

copy to J.M. Flores, Councilwoman

Typewritten Translation of Eva L. Kowalski

Eva L. Kowalski
1700 - Miracosta
San Pedro, California 90732
13 May 1986

SD/DEV
Bob Mason
Los Angeles, Ca.

Dear Mr. Mason:

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Let us in San Pedro have that piece of nature to pass on to our descendants. It is important!

Yours,
Eva L. Kowalski

copy to J.M. Flores, Councilwoman

SAN PEDRO GARDEN CLUB
California Garden Clubs, Inc.
SAN PEDRO, CALIF.

MAY 13 1986

H Q Space division
Attn. Mr. Mason,

The San Pedro Garden Club has gone on record to support the creation of a State Park at the White Point area. This benefit for all citizens now and in the future will go into effect unless the land is taken by the Air Force for theexclusive use of 170 officer families,

58

There are alternate sites for the housing, but the State Park will fail if these favored few take the land. Lets leave the beautiful open area to its best use_ a State Park,

59

Why was this Park not considered in theEnvironmental Statement?

Community Affairs Chairman.

cc Coastal Commission

STATE OF CALIFORNIA

DAVE ELDER
Assemblyman
57th District
REPRESENTING
Harbor City
Long Beach
San Pedro
Wilmington

May 14, 1986

Raymond E. Rodgers, Jr., Colonel
United States Air Force
HQ Space Division/DEV
P.O. Box 92960
World Way Postal Center
Los Angeles, CA 90009-2960

Attention: Mr. Robert Mason

Dear Colonel Rodgers:

Re: Draft Environmental Impact Statement on Military Housing Project in San Pedro, California

As noted in my testimony at the April 22, 1986 public hearing, the opportunity to comment on the draft Environmental Impact Statement (EIS) is appreciated.

60 It is nice to know that the Air Force believes that the housing project proposed is worthy of environmental review in a day and age when many attorneys would argue that the Federal government is not subject to the National Environmental Protection Act (NEPA). At the same time, it is unfortunate that the same attorneys can argue that the construction of a housing project must be completed in the name of national defense.

The draft EIS appears to be too narrowly focused in at least eight areas:

1. <u>The final EIS should incorporate a more detailed assessment of the possible presence and health and safety consequences of toxic or hazardous materials</u>.

61 The draft EIS speaks, almost in passing, of the possible presence of flammable hydrocarbon fuel, a nitric acid oxidizer and the suspected carcinogenic, PCB. In response, the draft implies that while a toxics investigation will be undertaken, it will be limited at the outset to a "search of available records" and interviews with persons knowledgeable about material handling during the Army's use of the site.

While that may be a good start, it seems imperative that a more through onsite investigation, including water, soil and possibly air sampling be undertaken.

62 This recommendation is made for two reasons. First, old records and former Army personnel, if they can be located after these many years, may not accurately and completely recount current and future hazardous materials risks and dangers both on and offsite. The offsite aspect is worthy of detailed review in the unfortunate event of hazardous waste migration to border zone properties.

Second, the military services have less than a sterling reputation for toxics management here in California. Specifically, and according to the California State Department of Health Services, the EPA's National Priorities List contain seven current and proposed military bases as candidates for hazardous waste cleanup. Those facilities are as follows:

63

Military Base		Location
1. Castle Air Force Base	-	Merced
2. Mather Air Force Base	-	Sacramento
3. McClellan Air Force Base	-	Sacramento
4. Norton Air Force Base	-	San Bernardino
5. Sacramento Army Depot	-	Sacramento
6. Sharpe Army Depot	-	Lathrop
7. Moffett Naval Air Station	-	Santa Clara

In the interest of public health and safety, it is strongly urged that the EIS call for a complete Remedial Investigation/Feasibility Study (RIFS) consistent with EPA's published guidelines and regulations. That study should be completed before any other development is undertaken to avoid allegations that contaminated soil or structures were improperly or unsafely removed.

64

It is my understanding, based on your comments at the hearing, that EPA's published RIFS guidelines and regulations will be followed during the course of the site assessment.

2. The EIS needs to explain why this is a national defense project.

65 It is understood that there is a property agreement that allows the federal government to revert all or part of the property if needed for national defense. However, it is unclear why the alleged lack of adequate housing for field grade and senior officers has stifled officer recruitment to Southern California. Nor, is it clear how this housing project can be justified in the name of national defense. The EIS itself, on Page 3-6, says there is only a "potential impact." More information should be included in the EIS on this subject.

3. Arrange for officers to buy housing in the open market.

66 With all due respect to the transient nature of the military, little information is given in Section 1.3 as to why officers must live in close proximity to each other. An explanation is needed as to why the EIS did not treat open market civilian housing as a bona fide and formal project alternative. Since the EIS has not given the actual total cost of construction of the entire development, wouldn't it be cheaper to invest in a well-run officer relocation and rent/mortgage subsidy program? Certainly, there is plenty of adequate housing for sale. That would also help stimulate the local economy.

4. Additional land reversion later.

67 If the proposed alternative is allowed, what definite assurance is there that the balance of the land at White Point will not ultimately be sought by the Air Force for more development? Will the land left be subject to an irrevocable deed restriction, or will it be taken, if needed, for national defense?

5. Housing density exception for the Air Force.

68 The intent of the Air Force is to provide 170 units of housing. Why must the density of the housing necessarily be compatible with surrounding housing? How much acreage would be saved at White Point if a higher density were allowed? Couldn't 170 units of space-saving townhouses be built instead? Why couldn't the Air Force buy one, two or three of the ailing condominium projects in Southern California? With the power of Congress on its side, it is difficult to see how local zoning restrictions necessarily mandate that single family dwellings with large yards be provided to military officers.

6. Potential social polarization of the San Pedro community.

69 It is noted on Page 5-75 of the EIS that 60 percent of the recently completed residential housing units are military houses not available to the general public. As a result, it can be argued that the EIS has not adequately described the cumulative impacts of "militarization" on the San Pedro community. The impact of transience on local schools and recreational access are examples of issues which need further treatment in the EIS.

7. Air Force Base expansion.

70 The need for new housing would be much clearer if an expansion of the base were proposed, thus mandating additional personnel. There may be a reason to increase housing allowances, but the purpose of building new structures off the Air Force Base itself is at best unclear.

71 In addition, I am puzzled that so little cost data was documented in the EIS. What are the actual project costs? The military may be saving on land costs, but there is little convincing evidence that the per dwelling cost, after site work is figured in, is going to be less than the cost of purchasing civilian housing on the open market, or constructing high density living quarters on the Base property.

8. <u>The EIS should describe, in more detail, the impact of removing and depositing substantial amounts of soil.</u>

72 The draft EIS, in Section "5.0 <u>Environmental Consequences</u>", references the removal offsite of existing "expansive" soil. No mention is made of where the soil will be taken for deposit. It would be unfortunate if that material was disposed of improperly, thus creating an unanticipated environmental consequence.

73 The magnitude of such an omission might be magnified many times if soil contaminated by hazardous wastes were removed and disposed of improperly. That is another reason why the conduct of a RIFS, to EPA standards, is so important before any other construction work begins.

I trust that the comments set forth above will be useful to and taken into account by the Air Force when the Environmental Impact Statement is revised.

Should you have any questions about these comments, please contact my office.

Sincerely,

DAVE ELDER
Assemblyman, 57th District

DAE/NWM/vp

San Pedro Planning Alliance
Post Office Box 2606
Ft. MacArthur Station
San Pedro, CA 90731

May 14th, 1986

HQ Space Division/DEV
P.O. Box 92960
Worldway Post Center
Los Angeles, CA 90009-2960
Attention: Robert Mason

RE: Draft Environmental
Impact Statement

Dear Mr. Mason:

An environmental impact statement is required with respect to a proposal for a major federal action significantly affecting the quality of the human environment. The human environment includes the natural and physical envrionment and the relationship of people with that environment.

74 Ultimately the purpose of this document is to help officals make a decision that is based upon understanding environemtnal consquences. Furthermore, to take actions that protect, restore and enchance the environment.

Given the balance of the various issues involved, the Air Force's decision will affect the area for year to come. The very fact that the Air Force has made an attempt to retake the property has caused conflicts between various groups within San Pedro. Homeowners groups have opposed the proposal. The business community once approved of the project and then changed their position. Alternative sites proposed by the Councilperson are opposed by various youth organizations. In general the Air Force has caused an upheavel in the community that cannot be measured by regulations because the affect has already been damaging.

75 Without diverting one inch from their original plans the Air Force has proceeded to push ahead. It is the opinion of most that the Air Force was merely going through the "motions" in discussing alternatives with the City of Los Angeles. That in effect the decision had been made. The Air Force will retake the property and although they have considered a range of alternatives none of these alternatives are suitable.

Therefore, is is hard to imagine the Air Force "making a decision" about the project based upon environmental factors. Their decision has already been made and the environmental considerations are merely problematic.

The Air Force has argued that the need for housing their personnel is great. It is so great that it will impose its will on a total community regardless of public opinion. It is hard to imagine that the Air Force's need for adequate housing is any greater than that of the general public's . Therer has been a housing shortage in Los Angeles City for a number of years and the people affected are in far greater need than Air Force personnel. Therefore, the reason for taking the property back is self serving.

The question that most is answered is; Who will benefit from the project? Will the public receive some benefit if 170 families get housed verses a state park? The answer is very simple. The Air Force's proposal will only benefit a few. A state park will preserve the environment and provide public access for years to come. Therefore, the Air Force's decision to move ahead with their project is totally self serving and without merit.

76

Submitted,

Warren Shahian

Warren Shahian
Chairperson,
San Pedro Planning Alliance

May 14, 1986

SD/DEV
Attn: Mr. Bob Mason
P. O. Box 92960
Los Angeles, CA 90009-2960

Dear Mr. Mason:

My family has been in San Pedro for 70 years and my husband's family came here in 1906, so we really love our town and have watched it grow through the years.

77 We don't Want to give up the last bit of ocean property at White Point to housing. We have nothing against the military, but we don't want to see housing going on that choice piece of land.

It is so peaceful out there at White Point and would make a beautiful park.

78 Please reconsider and build the houses at another location. Don't take away our last piece of ocean front property.

Thank you.

Mr. & Mrs. Wm. Farrell
1156 Elberon Ave.
San Pedro, CA 90732

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

May [illegible]

79

As a member of White Point Community Garden Association, I would like to request that you consider using "Alternate 2" plan for construction of Air Force housing. This would be the western portion of the property along Western Avenue between 28th Street and Paseo Del Mar.

I feel that by utilizing this section, that it would leave the community garden in it's present location. This is desirable for the following reasons:

Flat land which is preferred for gardening.

The fact that the soil has been conditioned for years. My allotment for 5 years.

The original purpose for the Army turning the surplus land over to the city, for recreational purposes, and gardening certainly does that!

Finally, as a former member of the U. S. Army Air Corps, WWII and knowing that the Air Force members and families contribute much to our community, I have sympathy with their need for housing, but we also have need for our gardens.

[illegible]
William D. Lowdie
NAME (PRINT)

1383 [illegible]th Place
STREET ADDRESS

San Pedro, [illegible]
CITY, STATE ZIP CODE

3600 Greve Drive

Rancho Palos Verdes, Ca. 90274

15 May 1986

U.S. Air Force Space Division
Attn: Mr. Robert Mason (SD/DEV)
PO Box 92960
Los Angeles Air Force Station
Los Angeles, California 90009

Dear Mr. Mason :

I am writing in support of the Air Force Housing at White Point in San Pedro. Having carefully weighed the pros and cons of arguments by residents nearby and considering the tremendous impact of traffic if a park were to be established instead...with overnight camping...I can only stress the firm belief I have that our Air Force families deserve top consideration. We are forever in their debt not only for past services to our beloved country...but for the sacrafices they make for us every day of their lives. If the Coastal Commission should approve twice the number of units, I would be in favor of it!

Yes, I am prejudiced toward the Air Force. For twenty-two years I was an Air Force wife, our children attended 13 schools before college and we never had a permanent "home"-and often were quartered in sub-standard housing. But we were a part of the most splendid "family" in the world, the United States Military Family. After the war, feelings ran against the military, but now thankfully, seem to be turning again to the realization of what a strong defense means to every citizen. The strength of our military men stems from the know-lege that their families are well housed and happy.

I urge your approval of the request of our Air Force for the proposed units!

Thank you for your consideration.

Sincerely,

Jeanne R. Taylor

cc: Joan Flores
Michael Wornum

May 15 1986

Irene C.Goldstone
P.O.Box 225 San Pedro Ca.
90731

I would like to protest the proposed military housing for 170 Air Force officer families at the beautiful ocean view Whites Point Wilderness area. This area is in the process of becoming a State Park for use of everyone.

80 The clustered housing for key personell at the extreme edge of permitted distance from the airport area is a defense threat. The only through exit roads are Western Ave, to the west and Gaffey and Pacific Ave to the East. These are all extremely crowded streets and have been blocked many times.

81 The wildlife and bird population has been underestimated. The site has been fenced for many years and altho some has been plowed to control weeds ,the uneven terraine shelters much wild life. I,personally have seen several types of owls, red tailed hawks,ring necked pheasant,quail and red winged blacbirds. The

82 environmental report does not cover the threat to the State Park Plan or adequately cover the wildlife that would be displaced,

83 There is also a threat for the possibility of landmovement as has happened recently in Rolling Hills by development,as White Point is between the slide area at South Shores and the active landslide at Point Fermin.

I urge the housing be placed elsewhere

Irene C. Goldstone

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

My family and I are residents of this community for over fifteen years. We shop, celebrate family events, meet our friends at many of San Pedro's establishments, including Caruso's, Pacific Diner, Papadakys and many others. I believe the enlargement of the Air Force community in San Pedro brings the best of influence on cultural, economic, social and educational aspects of San Pedro. The Air Force citizens not only are extremely desirable from a civic point of view but they are extremely dedicated and giving people. They thrive on developing local youth and education; they thrive on dedicating their time and energies to community cleanup, community cultural affairs and filling key community roles as coaches, directors of nursing, etc.

As if this were not enough, they are a patriotic lot - they are willing to serve their country even if most of them could make more money as civilians; they are willing to be subjected to frequent expensive moves; they do not complain that they are unable to purchase homes as easily as civilians; and last and most important, they are willing to give their lives for our way of life.

I believe any rational community should welcome such contributing citizenry by offering every possible acreage for Air Force use instead of nitpicking location, acreage and partitioning of basically Federal land.

The idea of a State Park at White Point is absurd, impractical and pathetic. White Point is hardly located to accommodate large traffic. Other detriments of State Parks emerge, including crowding, traffic, police protection of citizens and assurance against criminal fringes. If the Air Force wants twenty acres, I say give them 40!! and welcome their tax base, cultural and social contributions.

D. E. [illegible]
NAME (PRINT)

[illegible]
STREET ADDRESS

[illegible]
CITY, STATE ZIP CODE

To Air Force,

It is a very sad moment for us to hear & see your new plan for housing a White Fleet, San Pedro.

We love our gardens. They have helped our unemployed fishermen, our senior citizens, & many San Pedran children who come forth their parents to learn a healthful way of supplementing their food budgets & learning a great lesson.

We have spent years building up the soil. Now that it is in great condition to grow things it will be gone. Can't you reconsider the location?

84

Sincerely
Mrs. J. L. March
740 - 40th St
San Pedro Ca 90731

P.S.

It seems that this will really congest Pasco del Mar. It will take away an area that should be

85

kept for developing some open park for our town & Los Angeles. There is already so much congestion in the summer at Pt Fermin, Cabrillo beach & White Point Park. We don't dare leave on Sat & Sun for we cannot find a parking space when we return.

86 This is a lovely area we welcome air force personelle, but wouldn't upper recreation, Boy Scout park or area at Western Avenue be better for all of us; dispersing the traffic into three areas instead of concentrating it at Pasa del Mar?

G. M.

Typewritten Translation of Mrs. J.V. March

To Air Force,

It is a very sad moment for us to hear & see your new plan for housing a White Point, San Pedro.

We love our gardens. They have helped our unemployed fishermen, our senior citizens & many San Pedran children who come with their parents to learn a healthful way of supplementing their food budgets & learning a great lesson.

We have spent years building up the soil. Now that it is in great condition to grow things it will be gone. Can't you reconsider the location?

Sincerely,
Mrs. J.V. March
740-40th St
San Pedro Ca 90731

P.S.
It seems that this will really congest Paseo del Mar. It will take away an area that should be left for developing some open park for our town and Los Angeles. There is already so much congestion in the summer at Pt. Fermin, Cabrillo Beach, and White Point Park. We don't dare leave on Saturday or Sunday for we cannot find a parking space when we return.

This is a lovely area, we welcome Air Force personnel, but wouldn't Upper Reservation, Bogdanovich Park, or area at Western Avenue be better for all of us; dispersing the traffic into three areas instead of concentrating it at Paseo del Mar?

JOHN L. MCCOY
MAJOR GENERAL U.S.A.F. (RETIRED)
1609 VIA LAZO
PALOS VERDES ESTATES, CALIFORNIA 90274

May 16, 1986

Space Division/DEV
Attn: Mr. Robert Mason
P. O. Box 92960
Los Angeles AFS, CA 90009-2960

Gentlemen:

I have owned my home in beautiful Palos Verdes Estates for twenty-seven years and feel I know the needs and desires of this community. We do not want a State Park in the White Point area with its' mob scenes and traffic--overcrowding is anathema to us and the peaceful community we found when my family and I moved here in 1959.

On the other hand, having spent thirty years in the U. S. Air Forces, I know the needs and wants of the military. They also deserve adequate housing when assigned to a high cost metropolitan area such as Los Angeles. The unique and important task of the Space Division can best be performed in its present location near the Los Angeles International Airport. They need the added quarters built in the White Point area.

I would hope that this letter can add another qualified voice to the documentation being established.

Yours truly,

John L. McCoy
Major General U.S.A.F. (retired)

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

To MR. Mason,
P.O. Box 92960
L.A. CA. 90009-2960.

SIR! IN Response to the information just given me by the head gardener at White Point gardens, it is my understanding that the Air Force is going to take over our Community gardens which we have cultivated for at least the last six years, that I have been there. At least 90% of the gardeners are Senior Citizens as am I., I just turned 79.

87 There is plenty of room for houses on the hill above us with beautiful views, why not use this?

An old Air Corps Veteran

Ralph E. Evans
1110 So. Leland St,
San Pedro, CA
90731

Ralph E Evans
NAME (PRINT)
1110 So. Leland St
STREET ADDRESS
San Pedro Ca 9073
CITY, STATE ZIP CODE

Typewritten Translation of Ralph E. Evans

To: Mr. Mason,
P.O. Box 92960
L.A. CA. 90009-2960.

Sir: In response to the information just given me by the head gardener at White Point gardens, it is my understanding that the Air Force is going to take over our community gardens which we have cultivated for at least the last six years, that I have been there. At least 90% of the gardeners are Senior Citizens as am I., I just turned 79.

There is plenty of room for houses on the hill above us with beautiful views, why not use this?

An old Air Corps Veteran

Ralph E. Evans
1110 So. Leland St.,
San Pedro, CA
90731

JOHN W. LYNCH
PRESIDENT

LYNCH & COMPANY
CONSULTANTS TO MANAGEMENT

1940 W. ORANGEWOOD AVE., SUITE 110
ORANGE, CALIFORNIA 92668
(714) 978-9191

3857 BIRCH ST., #131
NEWPORT BEACH, CA 92660
(714) 639-8188

May 16, 1986

Mr. Robert Mason (SD/DEV)
U. S. Air Force Space Division
P. O. Box 92960
Los Angeles Air Force Station
Los Angeles, CA 90009-2960

Dear Mr. Mason,

88 I am writing to you to recommend the approval of construction and operation of 170 units of Air Force housing on 40 acres at White Point in San Pedro. I also recommend that Bogdanovich Park not be used for housing as it would impact recreation facilities for young people and that overnight camping not be
89 considered because of its impact on traffic and the prevailing environment.

At present, Air Force personnel are forced to commute many miles to their duty station, the U. S. Air Force Space Division near LAX. Critical work is being done there that involves the defense of our country and the Los Angeles area. We need to support that effort in every way that we can.

The units, when constructed, will house 170 Air Force personnel and their families with an estimated annual payroll of approximately $3 million which will have a salutary effect on the surrounding community. Military personnel are particularly noted for their citizenship and good conduct, they make good neighbors in any community.

Cordially yours,

John W. Lynch

/m

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

90

We feel it so very unfair because we have put alot of the time and alot of hard work into this. Most important we are on a fixed income we grow our food that we Cant afford to buy and most of all it is natural food. A new season of growing food has just started if it must be taken away wait until October when growing season is over.

Have Consideration for all

Vito Russo
NAME (PRINT)

1035 W. 26th St
STREET ADDRESS

San Pedro CA 90731
CITY, STATE ZIP CODE

Typewritten Translation of Vito Russo

We feel it is very unfair because we have put alot (sic) of time and alot (sic) of hard work into this. Most important we are on a fixed income we grow our food that we cant (sic) aford (sic) to buy and most of all it is natural food. A new season of growing food has just started if it must be taken away wait until October when growing season is over.

Have consideration for all

Vito Russo
1035 W. 26th St
San Pedro, CA 90731

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

LOVE
USA 22



91

Si prega: alla Signoria vostra di concedere: questo pezzitino di Terra perche aiuta Tanto alla famiglia, specialmente per Laverdura Fresca. Dopo Tanto Tempo che cortino questo pezzetino di Terreno o Tanta passione come la mia Famiglia ora viprego alla vosta Signoria di concedere questo pezzetino di Terreno

Distinti Saluti

Francesco P Cosentino

Translation: Italian to English

I beg your honor to allow us to keep this small piece of land because it helps the family very much, especially to obtain fresh vegetables. I am as upset as my family is (that) after such a long time part of this small piece of land (is going to be) taken away. Thus I beg your honor to allow us to keep this small piece of land.

Sincerely yours

Francesco P. Cosentino

Francesco P. Cosentino
NAME (PRINT)

391 W 17 ST.
STREET ADDRESS

San Pedro, Cal. 907??
CITY, STATE ZIP CODE

Typewritten Translation of Francesco P. Cosentino

Si prega: alla signoria vostra di concedere: guesto pezzitino di Terra perche aiuTa TanTo alla famiglia, specialmente per laverdura fresca. Dopo tanto tempo che cortino questo pezzetino di terreno o tanta passione come la mia famiglia ora viprego alla vosta signoria di concedere questo pezzetino di terreno

Distinti Saluti
Francesco P. Cosentino

****

I beg your honor to allow us to keep this small piece of land because it helps the family very much, especially to obtain fresh vegetables. I am as upset as my family is (that) after such a long time part of this small piece of land (is going to be) taken away. Thus I beg your honor to allow us to keep this small piece of land.

Sincerely yours,
Francesco P. Cosentino
391 W. 17st
San Pedro, CA 90731

May 19, 1986

Hearing Officer:

92

I am writing to you that I am very disappointed that the Air Force wants to take White Point for housing, where I have my garden. I worked hard for seven years to keep that garden going. It takes time and money not only hard work but I at least know that the vegetables I grow have no chemicals on them, and they taste better then bought ones. So Please let us keep our garden at White Point.

Thank you
Mike Savar
4014 So. Gaffey
San Pedro, Ca
90731

Typewritten Translation of Mike Savar

May 19, 1986

Hearing Officer:

I am writing to you that I am very disappointed that the Air Force wants to take White Point for housing, where I have my garden. I worked hard for seven years to keep that garden going. It takes time and money not only hard work but I at least know that the vegetables I grow have no chemicals on them, and they taste better then bought ones, So Please let us keep our garden at White Point.

Thank you
Mike Savar
401 So. Gaffey
San Pedro, Ca
90731

93

To whom it may concern:

I T will be a great hardship on myself and many, many, others at the "White Point Gardens" if it is taken away from us. It has brought us many delicious fruits & vegetables and joy to me by having my garden at "White Point" especially being pensioned, I can't express the savings, also. I plead to Mr. Mason, "the air force" to relocate & reconsider Elsewhere.

Thank you very much,
Mr. S. Salvato
May 13, 1986

DR. PAUL L. HINTON
OPTOMETRIST
11286 CRENSHAW BLVD.
INGLEWOOD, CA 90303

MARINA DEL REY, CA 90291
PM
13 MAY
1986

USA 22

SALVATORE SALVATO
1235 W. 24th ST.
SAN PEDRO
CALIF 90731

Typewritten Translation of Salvatore Salvato

To Whom it May Concern:

It will be a great hardship on myself and many, many, others at the "White Point Gardens" if it is taken away from us. It has brought us many delicious fruits & vegetables and joy to me by having my garden at "White Point" especially being pensioned, I can't express the savings, also. I plead to Mr. Mason, "the air force" to relocate & reconsider elsewhere.

Thank you very much,
Mr. S. Salvato
May 13, 1986

MICHAEL WILLIS
3476 LELAND ST.
SAN PEDRO, CA. 90731

HQ SPACE DIV./DEV
P.O. BOX 92960
LOS ANGELES, CA. 90009-2960

5/19/86

Dear Sirs:

94 I am a gardiner at the White Point Community Garden and as such I depend on the vegetables that I grow during the summer time to significantly reduce my food bill. I am adamantly opposed to any Air Force housing plan which would interfere with the Community Garden. If any plan is therefore to be implemented I pick Alternative A.

As I, as well as many others, have spent a lot of time + money improving our garden plots by adding soil, manure, + fertilizer to what was once rather unfertile land, it would cause a significant loss to have to do it all over again and I therefore oppose Air Force housing there.

Again, I urge you not to destroy our Community Garden.

Yours truly,
Michael E. Willis

Typewritten Translation of Michael S. Willis

Michael Willis
3476 LeLand St.
San Pedro, CA. 90731

5/19/86

H.Q. SPACE DIV./DEV
P.O. Box 92960
Los Angeles, CA. 90009-2960

Dear Sirs:

I am a gardener at the White Point Community Garden and as such I depend on the vegetables that I grow during the summer there to significantly reduce my food bill. I am adamantly opposed to any Air Force housing plan which would interfere with the Community Garden. If any plan is therefore to be implemented, I prefer Alternative A.

As I, as well as many others, have spent a lot of time & money improving our garden plots by adding soil, manure, & fertilizer to what was once rather unfertile land, it would cause a significant loss to have to do it all over again and I therefore oppose Air Force housing there.

Again, I urge you not to destroy our Community Garden.

Yours truly,
Michael S. Willis

RE: White Point Community Garden, San Pedro, CA.

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

5/19/86

Dear Sir —

Removal of the Garden would be a tremendous hardship on my family of five. Living in an apt. without any means of growing vegetables to supplement my food cost is a big worry to me. The original plan would give the Air Force an advantageous site with view property. The flat land should be left for recreation and the Garden land left as is. I hope the Air Force will reconsider and g with PLAN A, which will be of greater value to you.

95

Sincerely,

NAME (PRINT)

STREET ADDRESS

CITY, STATE ZIP CODE

Typewritten Translation of Tom LoGrande

RE: WHITE POINT COMMUNITY GARDEN, SAN PEDRO, CA.

5/19/86

Dear Sir--

Removal of the Garden would be a tremendous hardship on my family of five. Living in an apt. without any means of growing vegetables to supplement my food cost is a big worry to me. The original plan would give the Air Force an advantageous site with view property. The flat land should be left for recreation and the Garden land left as is. I hope the Air Force will reconsider and go with PLAN A, which will be of greater value to you.

Sincerely,
Tom LoGrande
1158 W. 23rd St.
San Pedro CA 90731

RANDOM LENGTHS
HARBOR COMMUNITY NEWS

5/20/86

Dear Mr. Mason —

The enclosed copy of our newspaper with the front page story on the Air Force hearing, as well as, my editorial on page 6 of this same issue is being submitted as written documentation opposing the proposed Air Force Housing plan.

Please send us a final draft of the Air Force Environmental Study when it is prepared.

James P. Allen

Mailing: P.O. Box 731 San Pedro, CA 90733
Office: 311 West 7th St. San Pedro, CA 519-1442

Typewritten Translation of James P. Allen

5/20/86

Dear Mr. Mason--

The enclosed copy of our newspaper with the front page story on the Air Force hearing, as well as, my editorial on page 6 of this same issue is being submitted as written documentation opposing the proposed Air Force Housing plan.

Please send us a final draft of the Air Force Environmental Study when it is prepared.

James P. Allen

Invasion of San Pedro

by James Allen

Not only did it seem quite odd to see all those blue coats at the DEIS hearing on White Point held at Peck Park Community Center, but, as my friend Frank Mayer said, "I've never seen so many colonels at one time in the same place." And Frank has been in the Air Force.

The presence of this many (more than half the audience) official, uniformed Air Force personnel at a civilian public hearing held to discuss reaction to the Environmental Impact Study on Air Force housing at White Point amounts to nothing less than a military invasion.

This obvious political maneuver was intentional on the part of Gen. McCartney of Space Division to overpower the meeting with pro-Air Force sentiment, stifle public opinion, and manipulate a community meeting. This action is highly questionable, unethical, socially corrupt, and probably illegal.

Is this what we can expect from our "friendly" Air Force neighbors in the future?

I would have no argument if individuals within the Air Force independently decided to attend a civilian meeting, in civilian clothes, to represent their own point of view — that at least intimates genuine concern and an assemblance of democratic forum, or if Gen. McCartney wished to elucidate the Air Force's position personally; this would be quite appropriate.

What we saw at this "public" hearing was nothing less than a political invasion by one general and his army of loyal brass on the body politic of San Pedro. This not only calls into question the "good intentions" of the Air Force now but also the legality of any findings that are derived from this hearing which in any way support the Air Force's position and any impact that support has on the final Environmental Impact Study.

Although every Air Force officer I talked with at this meeting denied having been ordered to attend, confidential sources within the Air Force stated that Gen. McCartney let it be known that he wanted to see as many "blue uniforms" present as possible. It is generally understood in the Air Force that when the General makes such a request it is best to comply.

It is also understood that Air Force uniforms, especially dress uniforms (with ribbons) are for official business and formal occasions only. This revelation not only substantiates my own misgivings about dealing with the Air Force but also calls into question all testimony given at the hearing referring to what "good neighbors" the Air Force can be, could be or have been. Who's to tell whether they have willingly come to help with painting out grafitti on an old San Pedro church or whether they were ordered to come? Who wants neighbors that will be deceitful about their true intentions when coming to public meetings or doing public service?

Do we really want "volunteers" in our community organizations that are paid to attend and whose true interest may only be for good PR for the Air Force? This somehow distorts the meaning of "volunteer," doesn't it? Especially when the rest of us donate valuable working or personal time to attend the same meetings. (I personally would love to be paid for some of those 8 a.m. meetings I attend.) Even more so we can never be quite sure whether they are acting under orders and have their own agenda to accomplish. In some political or quasi-political organizations in our community, this could compromise true democratic structure and can be seen as buying influence or perhaps buying votes.

I realize that there are many fine people in the Air Force, there are even a few individuals that disagree with the tactics and methods of the high command. And there are some that can see beyond their own special interests for housing but are compromised by their uniform and job from speaking freely. Even within the Air Force there are those who see the need for a park at White Point rather than housing for Air Force brass.

Perhaps these few Air Force personnel are the "good neighbors" we heard so much about at the public hearing, for they take into account the needs of their neighbors as well as their own and have the integrity to make up their own minds.

In the final analysis, though, the presence of these few does not compensate for the tactics of Space Division Air Force Command and Gen. McCartney's personal political invasion at the Peck Park hearing.

* * * *

You may try to outnumber us, out maneuver us, publicly castigate us for being "un-American" or even accuse me personally of not speaking the truth, but I guarantee you, Gen. McCartney, that the San Pedro community will not be silenced, no matter how hard you try to stifle public opinion or dominate public hearings, and I will continue to speak the truth as I see it, undeterred by your accusations.

The public debate over the future of White Point is of greater importance to the national defense of our political and constitutional rights than your 170 units of housing will ever be. After all, free speech is one of the primary things in the constitution that you are commissioned to defend and protect.

DEV



CITY HALL
LOS ANGELES, CALIFORNIA 90012

May 22, 1986

Colonel Raymond E. Rogers, Jr.
Department of the Air Force
Los Angeles Air Force Station
P.O. Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960

Dear Colonel Rogers:

The following are comments by the City of Los Angeles regarding the draft Environmental Impact Statement for military housing on White Point.

96 We share the United States Air Force (USAF) concern in providing adequate housing for military personnel and their families assigned to USAF Space Division. However, we question the manner in which it is being done. Trying to justify the reversion of 40 acres at White Point for military housing in terms of a national defense emergency is an arguable approach.

97 In reading the DEIS, it appears that the Air Force, despite the good intentions of their public involvement program, has not addressed the alternate siting proposals and compromises. Their examination of alternatives seems to have been done in a manner that supports their preferred project at White Point. The Air Force must make an earnest attempt to analyze and consider other viable housing options that may not be as environmentally damaging. We feel this EIS is patently inadequate. The items that were omitted are the very reasons for requiring an FIS.

Summary

98 In several respects, we believe the subject Draft EIS neither adequately assesses the environmental consequences of the proposed housing development nor adequately considers alternatives to the proposed action.

99 The document lacks even a conceptual site plan of the proposed development -- an omission which provides no clues to such fundamental concerns as how the project relates to the terrain, the possible effect of the project upon the visual environment, and how points of access to the site might affect local traffic conditions.

100 As to the potential for development of an urban state park at White Point, the document tends to rationalize and oversimplify the effect of the proposed housing project by stating that it would not preclude development of the park.

101 The Draft EIS lacks a convincing evaluation of alternatives to the proposed action. The section on alternatives to the project does not explore the benefits that might accrue from a clustered housing development, which include preservation of open space and cost savings in the land development process. Some of the key assumptions which underlie the allocation of housing densities for the various alternative site selections are erroneous.

Project Design

It is remarkable that the Draft EIS provides an illustration of the proposed conceptual plan prepared by the California Department of Parks and Recreation for an urban state park at White Point (Figure 5.15-1), but does not provide any site plan for the focus of the EIS -- the proposed 170-unit housing development on the southeastern 40-acre portion of White Point. The document indicates that no conceptual siting plans or engineering designs have been developed, nor have the interior or exterior design of the housing units been determined (pages 3-1 and 3-3). About the only hint of a project design is contained in a statement that "the siting plan will include an open "Green Belt" area" (page 3-1).

102 At minimum, we should expect the EIS to include a preliminary plot plan of the proposed project that shows an arrangement of lot configurations, structures, landscaping, roadways and access point to the site. A more satisfactory treatment of the project design would also include some preliminary renderings and elevations, with some discussion of the architectural and structural components of the housing units.

The absence of even a conceptual site plan undermines our capability to examine the project's land utilization (how the physical layout of the project relates to the terrain), its effect upon the visual environment (of special concern to a future state park at White Point, in particular, and to coastal zone management policies, in general), and the effect of vehicle access to the site upon traffic and circulation conditions in the immediate adjacent area.

Development of an Urban State Park at White Point

White Point, a coastal landmark on the Palos Verdes Peninsula, is endowed with scenic, open space and other natural and environmental resource amenities, the interplay of which makes it a unique and desirable area for outdoor recreational use. Coastal properties such as White Point are a rarity in the densely populated Southern California region where enormous urban growth and development pressures threaten the existence of natural landscapes and open space areas.

It is these attributes that led the California Department of Parks and Recreation to recommend inclusion of the upland area of White Point, in combination with the adjoining coastal beaches below, into the State Park System.

103 The Draft EIS concludes that the proposed action would not preclude the development of an urban state park on the remaining 124 acres of State, County and City property at White Point. The document notes as justification for its conclusion that 60 state parks in California encompass less that 120 acres. However, the Draft EIS does not take into account other factors, such as topography or how much is usable for park purposes, that may have an impact upon the future of a state park at White Point. For example, the EIS does not evaluate the displacement of the 300-space parking area, restroom facilities and day-use picnic areas on the State Department of Parks and Recreation plan for the area proposed to be occupied by the Air Force housing development. The displacement of these facilities, particularly the parking area, does not seem to correspond with the conclusion in the Draft EIS that public access to Royal Palms and White Point Beach would not be impeded by the proposed action (page 5-83).

104 In addition to the reduction of acreage available for development of a state park at White Point, the EIS should more comprehensively consider potential limitations that the housing proposal may have upon land resources that can adequately serve the future needs of park development. The issue of compatibility between the proposed housing development and a state park development is not addressed. The potential loss of scenic and visual qualities from the proposed housing development may also have a bearing on future plans to develop a state park.

Assessment of Alternatives to the Proposed Action

105 With the preservation of open space being a significant issue applicable to the proposed site and all of the alternative sites considered in the Draft EIS, we believe it is a serious shortcoming that alternative housing development designs are not given more consideration, e.g., clustered housing. An attractive, clustered housing development (possibly in combination with single-family detached development) could provide such benefits as preserving open space areas while minimizing such development costs as grading and provision for utilities. Further,with appropriate design, setbacks and buffering from adjacent single-family neighborhoods, we believe that modest increases in density that may result from a clustered housing development may be acceptable to the community as a tradeoff for preserving most or all of White Point for an urban state park.

106 In at least one instance in the Draft EIS, there is a discrepancy in the calculation of housing density in terms of dwelling units per acre. On page 5-09, the density stated for Alternative A is 3.4 dwelling units per acre. However, on page 3-19, the density stated for the same alternative is 5.3 dwelling units per acre. In the latter calculation, it is apparent that the calculation was

derived by considering the buildable acreage only (32 acres) rather than the total acreage of the site (50 acres), as was used in the former calculation. From our standpoint, it is more appropriate to express density as the relation of dwelling units to the total acreage of the site.

107 The minimum area for an R1 zoned lot in the City of Los Angeles is 5,000 square feet, which corresponds to approximately 8.7 dwelling units per net acre. Even with the assumption given in the Draft EIS that 30% of a site would be devoted to foundations and roadways (page 5-1), we believe there exists the possibility to allocate more single-family units to alternative sites. For example, with the assumption that 30% of the 16.5 buildable acres of Bogdanovich Park were to be occupied by roadways and utilities, the remaining 11.5 acres could theoretically still accommodate 100 single-family lots, each having a lot area of 5,000 square feet. Similarly, the 22 acres at Upper Reservation of Fort MacArthur could handle 134 single-family lots, each containing a lot area of 5,000 square feet. This differs considerably with the 90 housing units allocated to Bogdanovich Park under Alternatives B, C and D, and the 90 housing units allocated to Upper Reservation of Fort MacArthur under Alternative F, G and H.

Other Comments

108 According to the Draft EIS, funds were not appropriated by Congress to include demolition costs, which is a rationale provided for not selecting Upper Reservation of Fort MacArthur as a preferred housing site. Yet, the proposed 40-acre site at White Point contains the NIKE missile launchers, which presumably would be demolished.

109 Figure 4.8-2 (page4-62) is an outdated zoning map of the southern portion of the San Pedro Community. The height limit for most residentially zoned property in this part of the community is Height District 1XL (2 stories and 30 feet). Recent City Council adoption of the San Pedro Specific Plan (April 20, 1986) places a more restrictive height limit of 2 stories and 26 feet on residential properties within the coastal zone area. Bogdanovich Park is now zoned A1-1.

110 The correct 1984 population estimate for San Pedro, according to the City Planning Department's Data Support Unit, is 65,083. The figure given on page 4-65 (62,336) is the 1980 census population.

111 The Terminal Island Treatment Plant is a secondary treatment facility - not primary as stated on pages 4-90 and 4-92. It is also appropriate to note that existing Navy housing is completely tributary to LACSD No. 5 and their sewage is treated at JWPCP.

112 Sewerage service is not provided by the County for Bogdanovich Park or Upper Fort MacArthur Reservation as stated on pages 4-95 and 4-98.

Conclusion

It is our opinion that the EIS presented by the Air Force is inadequate. The City is disappointed that the Air Force's EIS gives very little substantive consideration to alternative housing sites as well as housing design and density.

113 The Air Force could accommodate all of its housing on alternative sites near White Point by utilizing a mixture of single-family and attached dwelling units. In fact, the Air Force has built attached units at the middle reservation of Ft. MacArthur, which is under the direct control of the Air Force and the Navy, recently successfully negotiated with the City for transfer of property for construction of attached units.

114 Significant use of White Point for housing of any nature would indeed eliminate any opportunity for a city or state park at this important site. The White Point Park site is the largest piece of undeveloped publicly-owned coastal property in the City of Los Angeles. It should be preserved for present and future generations.

115 The proposed specific plan of the City of Los Angeles designates White Point as a recreational area. This recommendation was reached with the assistance of a community advisory committee after community public hearings.

The City's goal has been to accommodate additional Air Force housing in our community while protecting the multi-million dollar state park option at White Point. In its compromise proposals to the Air Force, the City has never presented a proposal which would not allow all the housing units the Air Force requested in the San Pedro community. Nor have we ever suggested that the Air Force build fewer units in San Pedro and others at a location closer to El Segundo.

We will continue to offer to meet with the Air Force to discuss further the details of our proposals which would provide the Air Force with all its required housing units. We would further request the Air Force to follow the direction of Congress during its appropriation process which urged the Air Force to work with the City to resolve this issue. We remain committed to preserving White Point while offering other desirable and valuable City properties for future Air Force housing.

Sincerely,

Tom Bradley
Mayor

Mike Hayes
Councilwoman, 15th District

5-22-86

116

To Whom it my Concern.
Why do you want to take our farmes away from us. Every day my family and I injoy going to work at the farm. Some people say there is nothing wrong with progress but what farming is to families it brings them closer. The Children have more respect for nature and each other.

Thank ya
Angela Matteoi

Typewritten Translation of Angela Matteoioc

5/22/86

To Whom it my (sic) Concern.

Why do you want to take our farmes (sic) away from us. Every day my family and I injoy (sic) going to work at the farm. Some people say ther is nothing wrong with progress but what farming is to families it brings them closer. The children have more respect for nature and each other.

Thank you,
Angela Matteoioc

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEY, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

To whom it may concern,

It was a ~~very~~ disappointment to learn about the removal of the garden. We have worked very hard to obtain it. Growing our own vegetables has helped us a lot with our family finances.

117

We ask you to please consider a different site for the Air Force Housing.

It means a lot to us to keep our garden. We appreciate every effort. Thankyou, sincerely

Joe Caruso

JOE CARUSO
NAME (PRINT)

[redacted]
STREET ADDRESS

[redacted]
CITY, STATE ZIP CODE

Typewritten Translation of Joe Caruso

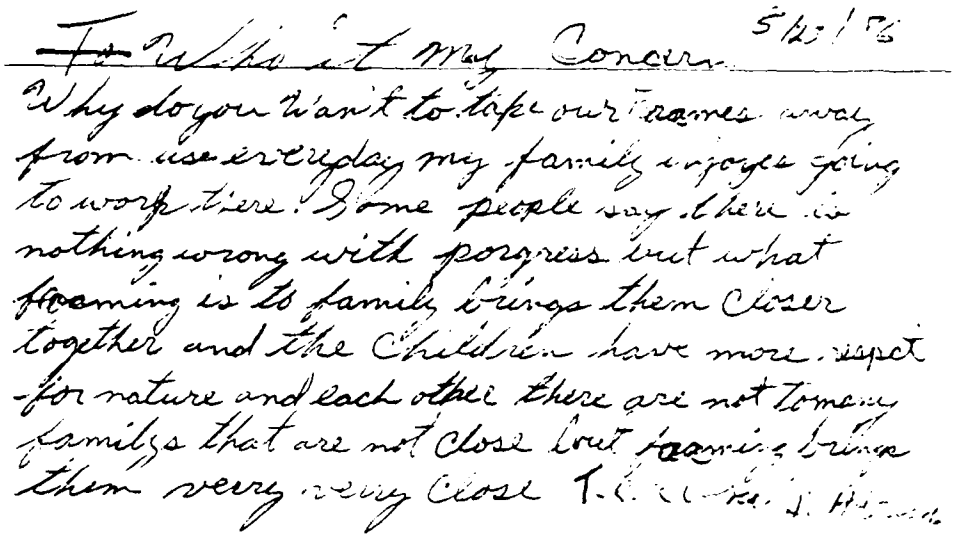
To whom it may concern,

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We ask you to please consider a different site for the Air Force Housing.

It means a lot to us to keep our garden. We appreciate every effort.

Thank you, sincerely
Joe Caruso



132

To Who it May Concern 5/23/86

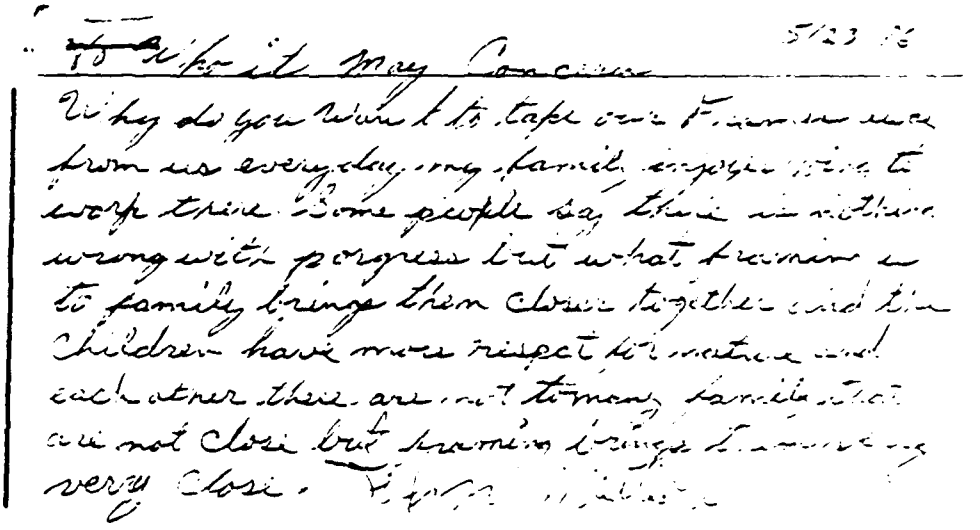
Why do you want to take our farmes away from use everyday my family injoyes going to work there. Some people say there is nothing wrong with porgress but what farming is to family brings them closer together and the children have more respct for nature and each other there are not tomany familys that are not close but farming brings them verry verry close T. [illegible]

Typewritten Translation of Teresa D. Abeuado

5/23/86

To Who it May Concern

Why do you want to take our farmes (sic) away from use everyday my family injoyes (sic) going to work there. Some people say there is nothing wrong with porgress (sic) but what farming is to family brings them closer together and the children have more respct (sic) for nature and each other there are not tomany (sic) familys (sic) that are not close but farming brings them verry (sic) verry (sic) close. Teresa B. Abeaudado



133

5/23/86

To Who it May Concern

Why do you want to take our Frames (sic) away from us everyday my family injoyes (sic) going to work there. Some people say there is nothing wrong with porgress (sic) but what framing (sic) is to family brings them closer together and the children have more respct (sic) for nature and each other there are not tomany (sic) family that are not close but framing (sic) brings them verry (sic) verry (sic) close. John Mattera

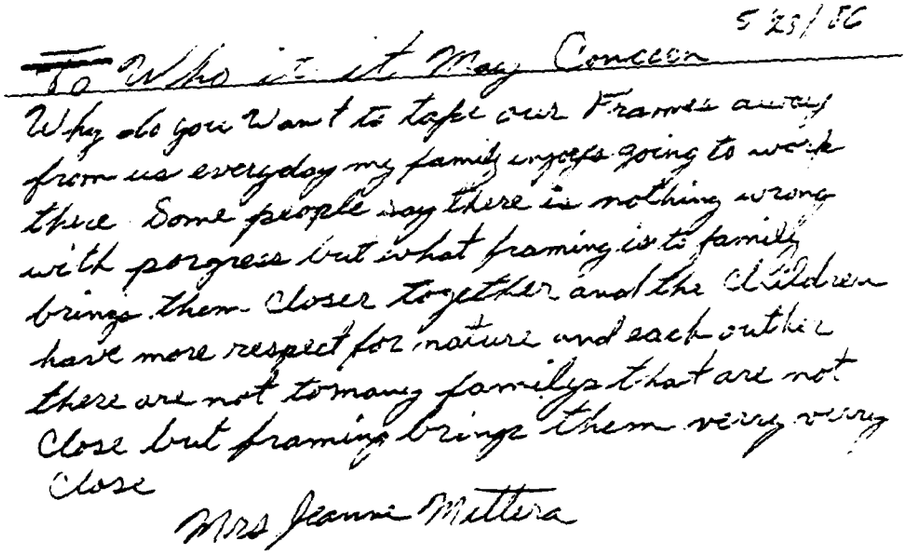
Typewritten Translation of John Mattera

5/23/86

To Who it May Concern

Why do you want to take our Frames (sic) away from us everyday my family injoyes (sic) going to work there. Some people say there is nothing wrong with porgress (sic) but what framing (sic) is to family brings them closer together and the children have more respct (sic) for nature and each other there are not tomany (sic) family that are not close but framing (sic) brings them verry (sic) verry (sic) close. John Mattera

134



5/23/86

To Who it May Concern

Why do you want to take our Frames away from us everyday my family injoyes going to work there. Some people say there is nothing wrong with porgress but what framing is to family brings them closer together and the children have more respect for nature and each outher there are not tomany familys that are not close but framing brings them verry verry close

Mrs Jeanne Mattera

Typewritten Translation of Mrs. Jeanne Mattera

5/23/86

To Who it May Concern

Why do you want to take our Frames (sic) away from us everyday my family injoyes (sic) going to work there. Some people say there is nothing wrong with porgress (sic) but what framing (sic) is to family brings them closer together and the children have more respect for nature and each outher (sic) there are not tomany (sic) familys (sic) that are not close but framing (sic) brings them verry (sic) verry (sic) close

Mrs. Jeanne Mattera

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

135

Gentelman:

The latest proposed by the air Force for housing at White Point entails doing away with the Garden It behooves us all to express our displeasure with their change in plans, as their final decision on where they will build (not wheater) has yet to be made. Their original proposed (which would leave the Garden where it is) is now known as alternate A. Many of us live in apartment and enjoy going to the Garden, Plus help us with our food bill.

Please leave the garden as the are, it would be a hardship to many if it was taken from us.

Yours truly
Mary Pirinan
a Garden for many years

NAME (PRINT)

STREET ADDRESS

CITY, STATE ZIP CODE

Typewritten Translation of Mary Pirinan

Gentelman (sic):

The latest proposal by the air Force for housing at White Point entails doing away with the Garden. It behooves us all to express our displeasure with their change in plans, as their final decision on where they will build (not wheater (sic)) has yet to be made. Their original proposal (which would leave the Garden where it is) is now know as alternative A. Many of us live in apartment and enjoy going to the Garden, Plus help us with our food bill.

Please leave the garden as the are, it would be a hardship to many if it was taken from us.

Yours truly,
Mary Pirinan
a Garden for many years

May 23, 1986

HQ Space Division/DEV
P.O. Box 92960
Los Angeles, CA 90009-2960

ATTENTION: Mr. Mason

Dear Mr. Mason:

In response to the DEIS meeting held April 22, 1986, I earnestly submit the following argument in favor of abandoning the Air Force plans to develop 170 officer's housing units on the proposed sites...

118 In this huge metropolitan area of millions and millions of inhabitants the acreage at White Point and Angels Gate is the only remaining undeveloped coastline in Los Angeles County. As a native Los Angeleno I have witnessed the rapid development and disappearance of our natural open land. It is truly heartbreaking to imagine this last parcel will be lost to military housing.

119 The importance of its preservation is surely apparent to all citizens who value the quality of life. Perhaps it would be different if the land in question were not the last remaining open coastline. Once developed, it is gone forever. The breathtaking public view from Western Ave. and 25th Street will be stolen from us. There will be no wild open space where adult or child can experience the solitude and inspiration that nature offers. The sound of the wind through the grass, the meadow bird calls, the fragrance of the plant life, gone forever. No future generations of children will ever know what the beauty of their land was once like. They will not know the exhilaration of running free across a hill or field, or the joy of discovering the small wonders of nature hidden in the grass. All gone, forever, replaced with bleak institutional housing. And what of the peace of an undisturbed hillside facing the sea, on a cool afternoon with the birds calling and the rustle of the wind through the grass?

120 Another point to seriously consider is that San Pedro already has its share of military housing. The housing at Fort MacArthur, off Western Ave., and off 25th St. already consumes large tracts of land in our community. At the meeting, Lt. Col. Sweeney accused the opposition of having the "NIMBY" syndrome. In the present case this can hardly be true since San Pedro and Rancho PV must already have more than 500 units of military housing. No more in my backyard would be an accurate description of the current situation. Enough is enough!

The military community is a transient one. As many times as I had to sit and hear some of these folks declare how they are the best

neighbors that one could ever hope to encounter, I had to reflect many more times on the fact that these kindly neighbors build fences around their properties, complete with barbed wire and armed guards which effectively bar my free passage within my own community. They are free to go wherever they please in our town and use whatever facilities that are available to all, yet their facilities are theirs alone. As individuals their interests in the community are shortsighted because they move on every few years. It is therefore not surprising that the Air Force wants this precious land for their own selfish interest, in the name of national defense no less! They are quick to place their concerns over those of a community which is already densely populated with condos and apartments. They don't share the future interests of San Pedrans and Los Angelenos.

121

The traffic on So. Western Ave. is already congested. Once the condos below the Harbor Cove shopping center are occupied, it will be worse. Add 170 more homes at White Point and the traffic will be unbearable.

122

If the land at White Point is destroyed, you will have taken away a valuable educational resource from the students of LACS. It is used for field trips for natural science classes. The Palos Verdes butterfly will have lost its natural habitat and will be forced closer to extinction. If housing is built there it runs the risk of someday becoming low income housing...and South Shores residents are concerned that a park might disturb their peaceful neighborhood! If you take Angels Gate for your housing the young and growing cultural center will be lost and the people living between Gaffey St. and Pacific Ave. will be hemmed in by military housing.

123

124

If because of the Air Force's powerful position (which is supposed to serve the citizens, not vice versa) they go ahead with the proposed project, I pray they have the decency not to build on the north or western portions of White Point which would destroy the Catalina and ocean views. If there is a plan to be favored chose Alternative "D", which would protect as much of the undeveloped land as possible and maintain the cultural center. The beautiful soccer field would be lost, but it could be relocated at Angels Gate where there is now a large level area in front of the skills center which is presently a vacant parking lot. Having the field there would further enhance the center's activities. Or why not put some of the units on the lot which is already owned by the Navy between The Rancho Verde Raquet Club and the Navy housing on Western Ave.?

125

126

Personally I do not understand why the officers can't purchase homes on the open market like other hard working patriotic people do, especially considering the fact that they retire in their forties with nice pensions and then get not too shabby jobs in the private sector.

127

San Pedro really does have its share of military housing and if the Air Force builds even more, what assurance do we have that all acres left for community use won't someday fall under the reversionary clause which is causing so much grief and concern in our community? Please open your ears and your hearts and help us preserve this very special site for our children, and for future generations that follow.

128

Sincerely,

Mrs. Kristine Zoeger-Puerta

MAY 1986

Mr. Robert C. Mason
HQ Space Division/DEV
P.O. Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960

Dear Mr. Mason:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled HOUSING PROJECT, SAN PEDRO, LOS ANGELES COUNTY, CALIFORNIA. We are pleased with the thorough treatment of air and water quality issues in the DEIS. There are, however, two air quality issues which should be addressed in more detail in the Final Environmental Impact Statement (FEIS). These are described in the enclosed comments.

We have classified this DEIS as category LO, Lack of Objections (see attached "Summary of Rating Definitions and Follow-Up Actions"). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send two copies of the FEIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Juli Jessen, Federal Activities Branch, at (415) 974-8193 or FTS 454-8193.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (2 pages)

Air Quality Comments

129 1. The FEIS should indicate whether the proposed project is consistent with regional plans for air quality. As noted in EPA's scoping comments, the Southern California Association of Governments is the appropriate organization to determine and certify this consistency. We especially encourage adoption of a project alternative which supports the regional transportation control measures.

130 2. The DEIS (p. 6-4) proposes a good mitigation plan. It would be helpful, however, for the FEIS to explain these measures in more detail. For example, the proposed transit improvements and the special programs offered by the Rapid Transit District should be described. The FEIS also should describe specific methods which will be used to promote public transit, vanpools and retrofit of out-of-state vehicles. This discussion should state the target rates for participation by residents in such programs.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
PACIFIC SOUTHWEST REGION
BOX 36098 • 450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 556-8200

MAY 2 3 1986

ER 86/566

Mr. Robert Mason
HQ Space Division/DEV
P. O. Box 92960
Worldway Postal Center
Los Angeles, California 90009-2960

Dear Mr. Mason:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS), Air Force Space Division Housing Project, San Pedro, California.

It does not appear that resources under the legal responsibility or concern of the Department, with a possible exception of some Endangered Species Act concerns, would be adversely impacted by the project, as proposed. To verify if any federally listed species may be present in the project area, we recommend that you directly contact:

131

Nancy Kaufman, Field Supervisor
U. S. Fish and Wildlife Serivce
Federal Building
24000 Avila Road
Laguna Niguel, California 92677

We appreciate this opportunity to comment on the DEIS.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: Director, OEPR (w/original incoming)
Reg. Dir., FWS

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

136

We presently have a garden in the White Point Community Garden. After seeing where the new proposed housing site might be and the alternatives available, we would certainly opt for alternative "A". Our beautiful coastal land is already so diminished that to use a piece so prime & beautiful seems a crime. Alternative "A", by bordering on Western Ave. as opposed to Paseo Del Mar, would leave a beautiful unspoiled area that we can still enjoy while still providing a housing area for your people.

Respectfully,

Millie Young
Frank Cronin

Millie Young / Frank Cronin
NAME (PRINT)

3700 S. Pacific Ave. #12
STREET ADDRESS

San Pedro, Ca. 90731
CITY, STATE ZIP CODE

835 29th Place
San Pedro, California 90731
May 26, 1986

137 The Draft Environmental Impact Statement (DEIS) on Air Force Housing in San Pedro is inadequate because it does not adequately consider alternatives to the proposed project and because it does not adequately consider the impact of housing construction at White Point or Bogdanovitch Park.

138 The DEIS briefly considers the possibility of constructing housing on the grounds of the VA hospital in Brentwood, but rejects it because the VA is quoted as saying that they need all the available space. However, the General Services Administration is now moving to sell off this land to the highest bidder. Evidently the Veterans' Administration has been persuaded that they don't need all of the space after all. A second point raised in the DEIS was that the former owner had donated it to the VA, with the proviso that it would revert to the former owner if the VA was no longer using it. This issue does not seem to be stopping the GSA from proceeding with the sale. If the Air Force has been really determined to seek out alternatives to White Point, they could have gone through similar steps attempting to build housing at this site. If, indeed, the GSA is successful in its attempt to sell off this land, part of it should be reserved for construction of air Force housing which would otherwise be located in San Pedro.

139 A second possibility which has not been adequately considered is the construction of housing at Upper Fort MacArthur. Demolition of presently existing structures may be no more difficult than demolishing the Nike missile site on the White Point property.

140 The Air Force does not begin to adequately address the issue that construction of housing at White Point may well prevent the establishment of a State Park at the location. A State Park, carefully managed, and planted with native plants, would provide needed habitat for wildlife, both plants and animals. In addition, it would provide many opportunities for outdoor recreation and education.

141 If Air Force housing is sited at Bogdanovitch Park, it should be done it such a way as to spare the soccer fields presently in use there. If this cannot be done, the Air Force should pay for constructing replacement soccer fields elsewhere. If the Air Force felt that they could not justify expending money on soccer fields, even though this would greatly remove a political roadblock for their project, then they should go back to Congress and request supplemental money for this purpose.

Sincerely,

Alfred Sattler

Alfred Sattler

5-28-86

Hq Space Division
Att: Mr. Mason
P.O. Box 92960
Los Angeles, CA 90009-296o

Dear Sir:

142 Please leave the gardens at White points at its present location. We all worked very hard fixing are space and now have it all cutivated and really to plant and harvest vegatables.

Thank you.
Teresa Mattera

Teresa Mattera
[redacted] 1316 S. ALMA
San Pedro, CA
90731

Typewritten Translation of Teresa Mattera

5/28/86

HQ Space Division
Att: Mr. Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Dear Sir:

Please leave the gardens at White points at its present location. We all worked very hard fixing are space and now have it all cutivated (sic) and really to plant and harvest vegatables (sic).

Thank you.
Teresa Mattera

Teresa Mattera
1316 S. Alma
San Pedro, CA
90731

1-97

5/26/86

HQ Space Division
ATT: Mr Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Dear Sir:

1-3 I have space at White point. It has been very helpful to me to grow my own vegetables since I am disabled and unable to to gainfully employed.

Please vote for Alternative plan "A" which will leave the gardens as is.

Thank you very much

Pasquale Mattera

PASQUALE MATTERA
1026 W. 14th St.
SAN Pedro, CA 90731
(213) 833-3907

Typewritten Translation of Pasquale Mattera

5/26/86

HQ Space Division
ATT: Mr. Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Dear Sir:

I have space at White point. It has been very helpful to me to grow my own vegatables (sic) since I am disabled and unable to to gainfully employed.

Please vote for Alternative plan "A" which will leave the gardens as is.

Thank you very much
Pasquale Mattera
1026 W 14th St
San Pedro, CA 90731
(213) 833-3907

May 26,1986

2184 Paseo Del Mar
San Pedro,CA 90732

USAF Space Division/DEV
Attn: Mr. Robert Mason
P.O.Box 92960
Los Angeles, CA 90009-2960

Subject: White Point

Reference: Environmental Impact Statement

Gentlemen:

This letter addresses the crippling scourge the "reversion clause" has had on the making of plans to restore the environmental focus at White Point. That being the recreation and social centers so vividly chartered by celebrating visitors from Pasadena, San Pedro, Los Angeles and surrounding counties during the 1920s and 1930s (See excerpts from SAN PEDRO, A PICTORIAL HISTORY enclosed).

The military was not solely responsible for halting the development of recreation facilities in the area. I hear the 1929 Crash had something to do with the demise of the fairways of the San Pedro Golf and Country Club on which our South Shores home now stands. I should be thankful for that but doesn't it illustrate the permanentloss to public benefit the building of houses on prime coastal land can cause?

144 I am confident, now, we will get a patrolled park. I hope, too, the Air Force gets suitable housing in the area. A necessary concession, in my view, to that end is the deletion of the reversion clause asit now exists.

Without the threat of reversion we can do more than tromp down to Royal Palms, broom in hand, to sweep the terrazzo dance floor.

I am not writing as a director for the San Pedro Bay Historical Society but as one of many concerned citizens in the Southland who have ready testimony to offer supporting the preservation of San Pedro's colorful heritage. Wouldn't the Air Force enjoy entering into the spirit of cultural restoration and help make things happen? I think so.

If you wish to contact me call me at home, 213/547-0120, or at work, 213/517-6180.

Sincerely,

Milton W. Heyne

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

1. I AM FIRMLY behind the AIRFORCE IN YOUR HOUSING PROPOSAL AT WHITE POINT.
2. YOU HAVE PUSSY FOOTED AROUND WITH SOME OF THE ANTI-GROUPS TOO LONG AND FOR NO GOOD.
3. THE AIRFORCE SHOULD HAVE TAKEN THE ENTIRE FORT MAC PROPERTY WHEN THE OPPORTUNITY WAS PRESENTED.
4. THE OFFICERS CONNECTED WITH THE SPACE PROGRAM, IN FACT, ALL THE PERSONNEL, SHOULD HAVE A SECURE, ATTRACTIVE PLACE TO LIVE.
5. I THINK YOUR P.R. PROGRAM IS VERY POOR, YOU MIGHT TAKE A LESSON FROM CAPT. HEALEY OF THE NAVAL STATION.

P.S. I SUBMITTED AN ARIEL PHOTO OR AVAILABLE A CITY OWNED LAND FOR A LOCATION FOR SOCCER FIELD IN THE NORTH END OF SAN PEDRO. JPH

JACK P. HOLT
NAME (PRINT)
P.O. BOX 12
STREET ADDRESS
SAN PEDRO, CA 90733
CITY, STATE ZIP CODE

Typewritten Translation of Jack P. Holt

1. I am firmly behind the air force in your housing proposal at White Point.

2. You have pussyfooted around with some of the anti-groups too long and for no good.

3. The air force should have taken the entire Fort Mac property when the opportunity was presented.

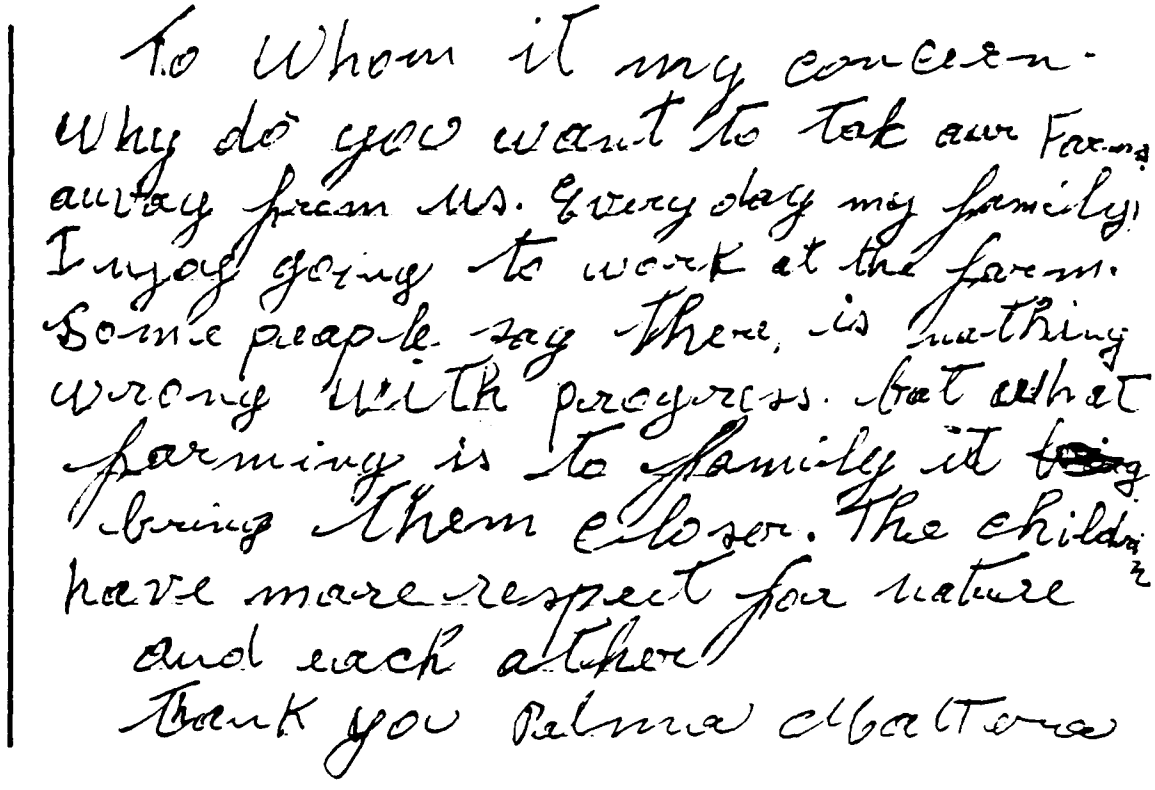
4. The officers connected with the space program, in fact, all the personnel, should have a secure, attractive place to live.

5. I think your P.R. program is very poor, you might take a lesson from Capt. Healey of the Naval Station

Jack P. Holt
P.O. Box 12
Sa Pedro, CA 90733

P.S. I submitted an ariel photo or available LA city owned land for a location for soccer field in the north end of San Pedro.

145


To Whom it my concern.
Why do you want to tak our Farms
away from us. Every day my family
I njoy going to work at the farm.
Some peaple say there is nothing
wrong with progress. but what
farming is to family it ~~to~~ bring
bring them closer. The childr
have more respect for nature
and each other
Thank you Palmor Mattera

Typewritten Translation of Palmor Mattera

To Whom it May Concern.

Why do you want to tak (sic) our Farms away from us. Everyday my family, I njoy (sic) going to work at the farm. Some peaple (sic) say there is nothing wrong with progress but what farming is to family it bring them closer. The children have more respect for nature and each other.

Thank you Palmor Mattera

255 W. Fifth Street, P.O. Box 471
San Pedro, California 90733
(213) 831-0611

LOGICON

27 May 1986
LA-86033

HQ Space Division/DEV
PO Box 92960
Worldway Postal Center
Los Angeles, CA 90009-2960

ATTN: Mr. Robert Mason

Dear Mr. Mason:

The enclosed comments are provided in response to the Draft Environmental Impact Statement for the proposed Air Force Space Division housing project in San Pedro.

I hope they will be of some value in this important endeavor.

TRAFFIC

146 The traffic analysis showed minor impacts. I expect that the impacts are even less than might be inferred from the report since Space Division operates on very early hours. They are generally on the road about one hour earlier than most people. These hours are set to minimize the travel time of the personnel and to allow maximum overlap for communications to more easterly time zones.

147 The state park planning report suggests an annual visitation of 500,000 people. This is an average of 1,370 per day for 365 days per year. I would guess that peak crowds on weekends in the summer might be 3 to 5 times the average of 4,100 to 6,800 people. This compares to the population of the adjacent census tracts of about 10,200. Thus on a busy weekend, the local population will grow by 40 to 70 percent. This could be a serious impact not only on the quality of life of the residents, but also on the beach facilities themselves.

POLICE SERVICE

The state estimates that the crime problem associated with the proposed park will be minor, based on comparison to a facility of similar size, the "Pendelton Coast". The conclusion is misleading since the locations are totally different and the character of the average visitor is different.

The matter of concern to the residents is not the amount or type of crime within the fences of either the USAF housing project or the state park. What does matter is the potential change in the crime rates in the surrounding neighborhoods.

148 Today, the police report that crime on the existing public beaches is minor. The reason for this is that the gangs which frequent the beaches have declared it a "neutral" territory. Thus while they create distress to the locals who might wander into the beach area, they in fact do no harm until they leave the park. Now imagine the possibilities for mayhem in the local neighborhoods when these people find out that they can camp out overnight. And recall that the state security people go off duty at 1:00 am.

The experience in other parks is impossible to relate because they don't record crimes committed by visitors to the parks in adjacent areas. Also they don't get the same level of "gang" visitation.

The potential park security staff numbers five. It is not clear if the staff of five is for each shift or if the staff covers the two shifts per day, seven days a week. In any case, this size staff doesn't seem like a very strong force for peak crowds of upwards of 7,000 people.

Another possible outcome for a park would be the case where the existing traffic of "undesirables" finds a welcome and the word spreads. "Here is a beautiful park and beach which is cheap to spend the night and bring your friends". The size of the problem people groups could grow as this becomes a haven for them. They could come from all over the state and country to enjoy a "neutral territory" in the sunshine. The idea of a magnet is certainly worrisome.

Until someone can provide a forecast of the crime potential outside a park in an urban area, no conclusions can be made.

STATE PARK

In the past when a major park was proposed, local opinion came out negatively. I suggest that the only support for a park is coming from those who oppose any development of the land. And if it ever is to be developed, those same individuals will rally just as strongly to oppose a park.

149 Most recently the boy scouts were prohibited from using the land as a camping site. The noise was a problem. Imagine the noise from hundreds of families camping in the area. The motor generators alone would be a serious impact.

150 The potential existence of toxic materials in the area should be studied further. The cost of removing these can be handled by Federal sources. But if a state park is planned, then necessary funds may be hard to get. Failure to secure funds would leave the land in a toxic state and probably undeveloped for the foreseeable future.

BOGDANOVICH PARK

151 The notion that the athletic fields at Bogdanovich Park will be replaced is wishful thinking. The city has made no commitment of land and money. Based on the record of not living by written commitments, this may be just as well. And the likelihood of the Air Force having any money left over to help is also wishful thinking. Due to the delays in the project caused by the city's intransigence, the costs of construction may exceed the budgets even today.

LOGICON

One has to wonder if the motive to relocate the ball fields isn't driven by local residents desire to reduce weekend noise and congestion. Air Force housing would provide that result, but let's be up front and get the city to put some funds and land deeds in escrow to preclude failure of this approach.

The concept of tearing down existing facilities needlessly and then causing a split operating location for the housing with the doubling of expense for security makes little sense to a taxpayer. Why spend all this unnecessary money?

Sincerely,

LOGICON, INC.

F. T. Cummings
Vice President & General Manager
Strategic & Information Systems Division

FTC/klr

STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, Governor

CALIFORNIA COASTAL COMMISSION
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SAN FRANCISCO CA 94105
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STAFF REPORT AND RECOMMENDATION

ON CONSISTENCY DETERMINATION

Consistency Determination
No. CD-17-86
(U.S. Air Force)
49th Day: 5-29-86
Staff: JM-SF
Commission Meeting: 5-29-86

FEDERAL AGENCY: U.S. Air Force

ACTIVITY DESCRIPTION: Consistency Determination for re-acquisition of 40 acres and construction of 170 single-family residences for officer housing

ACTIVITY LOCATION: White Point, San Pedro, Los Angeles County. (Exhibits 1-4))

SUBSTANTIVE FILE DOCUMENTS:

1. Draft Environmental Impact Statement, Air Force Space Division Proposed Housing, White Point, San Pedro, California, April, 1986

2. Federal Agency's Consistency Determination, April 14, 1986

3. CD-50-84 (U.S. Air Force)

STAFF NOTE:

In June of 1985 the Commission unanimously objected to a consistency determination made by the Air Force for re-acquisition of 50 acres at White Point and construction of 170 single-family dwellings. The Commission found that the proposed development would preclude development of a State park on the site and thus conflict with the recreation and access policies of the Coastal Act. The Commission further found that the alternative analysis undertaken by the Air Force met neither "the intention or the requirements of the CCMA." This project is essentially the same project, except that the site proposed for the housing has been changed to a flatter portion of the site and that 40 acres are proposed to be re-acquired rather than 50 acres.

After the Commission objected to the consistency determination, the Air Force sought entry to the land for geotechnical testing. The City of Los Angeles owns the land at present and objected to the Air Force's entering the land. In the context of court action in which the Air Force sought to condemn the land and occupy it for geotechnical testing, the Air Force was ordered to prepare an Environmental Impact Statement (EIS).

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During the fall of 1985, it seemed as if negotiations between the City of Los Angeles and the Air Force would result in a compromise that would preserve the option of a State Park by using City-owned Bogdanovich Park as a site for all or most of the housing. In a letter dated June 28, 1985 the Deputy Assistant Secretary of the Air Force indicated interest in a "...split housing development between a reduced area on White Point and the Bogdanovich site." In a further letter dated August 22, 1985, the Air Force indicated that they were:

> ...willing to pursue Bogdanovich as our primary site. The only question outstanding is how many housing units could be accommodated on the site in a density and configuration acceptable to the Air Force and compatible with the surrounding community...I have pledged to you that the Air Force will make a concerted effort to site all of our housing units without using White Point land and, if this is not possible, we will use as little land on White Point as we can reasonably get by with. In addition, I have pledged that any use of White Point land would be done in a way that would fully consider future park development and thus minimize any adverse impact.

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Following further discussion, on September 4, 1985 the City offered use of the entire Bogdanovich Park parcel and up to 10 acres of White Point (Exhibit 12) if the reversionary clause in the title was also cleared. After a further exchange of letters, the Air Force responded on December 17, 1985 that it needed 15 acres at White Point as well as all of Bogdanovich Park rather than 9 acres (see Exhibit 11). Negotiations broke down at that point, and the Air Force is now seeking 40 relatively flat acres at White Point.

154 It appears to staff that the Air Force proposal exceeds that which is necessary to provide housing in several ways. The Air Force is is trying to create residential amenities at White Point by providing large lots, spectacular views, and a private recreational area. The Air Force has not made its site plans available, and has not responded formally to site plans prepared by the City of Los Angeles. Staff believes that it is inappropriate to bat acreage figures back in forth in negotiation without having site plans that establish the tradeoffs for the two competing interests, military housing and recreation. Clearly 170 units of housing can be constructed on Bogdanovich Park and 9 acres of White Point as suggested by the City. Staff believes that the Air Force's "need" for 16 acres rather than 9 acres relates strictly to further amenities for the personnel. Because those amenities would seriously compromise the potential of the site for a State Park, staff recommends that the Commission object to the consistency determination.

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STAFF SUMMARY AND RECOMMENDATION:

I. Staff Summary

A. Project Description.

The United States Department of the Air Force proposes to re-acquire 40 acres of land from the City of Los Angeles and construct 170 single-family attached homes for field grade and senior Air Force officers. The proposed site is 40 upland acres of the 145-acre oceanfront area known as White Point in San Pedro, Los Angeles County (Exhibits 2, 4). [illegible] resulting in the

development would be assigned to the Los Angeles Air Force Station (LAAFS), the headquarters for Space Division, which includes the 6592nd Air Base Group and 20 tenant organizations. Space Division is responsible for the research and development of all Air Force space systems along with most of the space systems for the rest of the Department of Defense. The 170 dwellings are proposed to have a unit mix as follows:

1) 20 three bedroom at 1,350 square feet;
2) 70 three bedroom at 1,400 square feet;
3) 10 four bedroom at 1,450 square feet;
4) 50 four bedroom at 1,550 square feet; and
5) 20 four bedroom units at 1,700 square feet.

A site plan for the project has not been included in the consistency determination. White Point is approximately 20 travel miles southeast of the LAAFS. According to the Air Force, the housing will generate a population of approximately 650 persons.

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White Point is a 145 acre shorefront and upland site that was formerly part of an Army missile battery. The site was not needed by the Army and was deeded to the City of Los Angeles for recreational purposes. The 115 acre upland portion features a prominent ridge on the upcoast (western) boundary and a well defined valley adjacent to the ridge. The effect of the topography is to form a bowl that makes adjacent development virtually invisible.

B. Federal Agency's Consistency Determination and Findings

The United States Air Force has found that the proposed project is consistent to the maximum extent practicable with the policies and objectives of the California Coastal Management Program.

II. Staff Recommendation

The staff recommends that the Commission adopt the following resolution:

Objection

The Commission hereby objects to the consistency determination made by the United States Department of the Air Force, finding that the proposed project is inconsistent with the California Coastal Management Program (CCMP) because the proposed activity would have significant adverse effects on the coastal zone and alternatives are available that would eliminate or reduce those adverse effects.

III. Findings and Declarations

The Commission finds and declares as follows:

1. Introduction. This case involves the differing interests of the U.S. Air Force, the Commission, the State Department of Parks and Recreation, and the City of Los Angeles. Although White Point was once owned by the Army and operated as a missile site, it is now owned by the City of Los Angeles. Thus the land is within the coastal zone and its disposition and use directly affect the coastal zone. The conveyance of these lands to the City includes a

provision for reversion of the land in the event that all or any part of the lands are "needed for the national defense". The City contends that teh Air Force's proposed housing project is not "needed for the national defense." The City is contesting the reversion on that basis and urges the Commission to object to the project. In addition to weighing possible impacts of this project on public access and recreation and other goals of the California Coastal Management Program (CCMP), the Commission must also evaluate the importance of this project for the national interest in national defense.

The Commission has in the past reviewed several major military facilities. Perhaps most significant was the Commission's action on CD-22-82, which involved installation by the Navy of a landing craft air cushioned (LCAC) base at Camp Pendleton in San Diego County. That project involved development of 80 acres of a coastal mesa, cutting an access ramp 350 feet wide and 2100 feet long into the natural bluffs, staging activities on Red Beach in Camp Pendleton and the Silver Strand in Coronado, as well as noise and direct construction impacts on number of endangered species. That project, involving amphibious vehicles and training of personnel who might ultimately use the vehicles, related directly to national defense. It also was a marine operations and thus clearly coastal dependent. Even so, the Commission objected to the initial consistency determination, and ultimately concurred only after a number of mitigation measures were included to address the project's impacts.

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The Commission has also concurred in development of other Navy projects, chiefly in San Diego Bay, that relate directly to national defense. Such projects include a wide range of modifications to the Navy bases within the bay intended to upgrade or expand the facilities for ongoing operations and increased military readiness. In these instances, the Commission has recognized and given weight to the direct relationship of these projects to the national interest in military readiness.

In contrast, this project would not be an integral, necessary part of a defense establishment, such as a missile site or a naval base. Further, the facility proposed would not be a direct support facility for a defense establishment, such as a supply base or even office support. Rather, this housing project would only be indirectly related and non-essential to the military facility located in El Segundo. The Commission finds that because adequate military housing could be provided elsewhere, use of White Point for this project cannot be considered so vital to the defense effort as to overwhelm other policy considerations, particularly those of impact on recreational values. Both the Coastal Act and the National Environmental Policy Act require evaluation of project alternatives. That inquiry, which is the cornerstone issue on this project, has been superficially performed by the Air Force. This superficiality has hampered Commission review. Nevertheless, the availability of acceptable alternatives seems apparent to the Commission, and has not been disproven by the Air Force.

2. Recreation and Visual Impacts. Section 30213 of the Coastal Act states, in part:

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> Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible provided. Developments providing public recreational opportunities are preferred.

159 (Con't)

Section 30223 of the Act, provides:

> Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible...

Finally, Section 30221 provides that:

> Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

The relevant section of the Coastal Act governing scenic qualities is Section 30251, which provides in relevant part:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas...New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The project site is a 145-acre former low intensity use military facility, (similar to Fort Funston in San Francisco) situated upland and adjacent to Royal Palms State Beach in the southeast portion of the Palos Verdes Peninsula. The site is one of the few remaining urban open space shoreline areas in Southern California with sufficient geological stability to permit moderately large-scale development for recreational use. In 1976 after deactivating the facility, the federal government deeded the upland portion of the property (115 acres north of Paseo del Mar) to the City of Los Angeles for recreation purposes with the stipulation that the property could be reclaimed if needed for national defense. In 1978 the 30-acre beach property south of Paseo del Mar was deeded to Los Angeles County and is now known as White Point County Beach. Recognizing the importance of White Point as a recreational resource of statewide significance, the State Senate directed the Department of Parks and Recreation, with the participation of the State Coastal Conservancy, the County of Los Angeles, the City of Los Angeles, and other private and public entities, to conduct public meetings to develop a plan for the utilization of White Point for recreation purposes for (among others):

1) The operation of the White Point property in conjunction with Royal Palms State Beach;

2) Establishment of recreational uses, including a determination of the suitability of the property for overnight camping and the feasibility and effectiveness of establishing buffer areas between the surrounding neighborhood and any recreational uses that may occur on the White Point property; and

3) The provision of safe public access between the bluff and the beach-level portions of the White Point property across Paseo Del Mar.

The Department of Parks and Recreation held five public meetings between June 28, 1982 and February 22, 1984. As a result of the public participation and comment, the State Department of Parks and Recreation published a White Point Feasibility Study strongly recommending establishment of a 145-acre state park at White Point.

Meanwhile in March 1984, the Department of Defense initiated efforts to exercise the reversion provision of the deed, asserting that White Point was needed "in the interest of national defense".

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The White Point Feasibility Study notes that:

> White Point is in a good location for a recreation facility, because about 10 million people live within a (24-mile) radius. More than half the state's population resides within a two-hour drive of the area.
>
> White Point offers an excellent opportunity to give its visitors a variety of recreation activities -- ocean-oriented recreation, education and research, visiting historical and cultural sites, family camping, picnicking, nature appreciation that include outstanding panoramic coastal views.
>
> The addition of White Point to the State Park System would not only provide a high-quality active recreation experience, but would also protect a vitally needed coastal urban open space and preserve its natural and cultural resources for future generations.

The Study recommends that:

> It would be in the best interests of the people of this state to consolidate the city, county and state lands at White Point into a single recreation complex.
>
> While both the city and the county would be capable of managing and operating the consolidated area, the site in its entirety possesses sufficient size and state significance for inclusion in the State Park System. If, however, 50 acres of the upland site were converted to military housing, it would seriously degrade the resource and open space values, and would effectively eliminate the department's ability to develop a park of statewide significance. (Emphasis added.)

The Feasibility Study further recommends that:

> Any State Park System unit at White Point should be managed and developed in conjunction with Royal Palms State Beach, to provide an optimum balance between preservation and interpretation of natural and cultural heritage values, while allowing the opportunity of healthful outdoor recreation for a large segment of the State's population. Priority would be placed on development of facilities centered toward the interior of the site, and immediate use of the neighboring residential areas. Early emphasis would be given to initial development of [illegible] with the upland and beach areas for immediate use.

A memorandum dated October 25, 1984, from the Department of Parks and Recreation States:

> These scenic costal properties are highly significant recreation open space and cultural resource areas...As a unit of the State Park System, this area would meet a serious deficiency of outdoor recreation opportunities and provide visitors with an interpretive program of colorful human activities in the heavily populated Los Angeles metropolitan region. Even in their presently undeveloped state, these lands provide much needed urban open space and dispersed recreation opportunities. The site now meets minimum standards for developing a campground in the upland area that could be screened from neighboring residential areas.
>
> If, however, 50 acres of the upland site were converted to military housing, it would seriously degrade the resource and open space values, and would effectively eliminate the department's ability to develop a park of statewide significance...The State Park and Recreation Commission is actively considering the nomination of the White Point Project for the use of development funds that would be available from the 1984 Park and Recreation Facilities Bond Act. This would assure early development of public use facilities. (Emphasis added.)

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Since the time of that memorandum, the Department of Parks and Recreation has placed development of this site in the first priority ranking for use of the 1984 bond funds. In short, this coastal upland currently functions directly as a rare open space recreational area in the midst of the City of Los Angeles. It also functions as a support area for existing public beaches at White Point. The continued availability of this upland for recreational use is essential to the State's near-term plans to develop a park of state-wide significance with ocean frontage and upland support areas for camping and open space activities.

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The Air Force proposes at this time to use 40 acres of this land for housing. Reversion of this land has three important impacts on the viability of the remainder of the site for park use: it will have a major visual impact from virtually the entire remaining area; it will constrain or eliminate the ability of the Department of Parks and Recreation to provide buffers between the park and surrounding residential uses and still have sufficient area for park uses; and it will set a precedent for incremental loss of the park area that may make the Department reluctant to invest money in park facilities that may be lost through reversion of land to the military.

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The proposed development site is highly visible from virtually the entire remainder of the site. Thus the proposed reversion would not only eliminate one of the more scenic portions of the site from public use, it would also eliminate one of the main attractions of the site, which is that nearby housing is invisible from much of the frontal slopes. The construction of housing in the viewshed of the Park is in clear conflict with Section 30251; both the City of Los Angeles and the Department of Parks and Recreation consider the site's visual quality essential to its value as a park.

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The Air Force argues that development of detached, large lot housing is necessary to meet military requirements and neighborhood concerns. The Air Force argues further that reduction of the area of the park would only diminish, but not eliminate the potential of the site for State Park use. The Department of Parks and Recreation is concerned that both physical and visual buffering must be provided between residential uses and camping sites, and that if the overall acreage of the site drops below 100 acres, there would no longer be enough room to provide that buffering. With a smaller park area, Parks is concerned that providing necessary buffering on such a steep and visually sensitive site, would nearly eliminate the sites potential for camping at a density comparable to other State Park units.

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Another serious problem is the precedential effect of the proposed action. Both the Air Force and the Navy have indicated that they need space for officer housing. If part of White Point is allowed to revert to the Federal government, more requests for reversion may be forthcoming. Ultimately, the entire site could be devoted to low density residential development "needed for the national defense," leaving no recreational area at all.

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For these reasons, the Commission must disagree with the conclusion of the Air Force that a State Park would still be possible on the site if a housing project is built. Rather, the reversion and development proposed by the Air Force would severely degrade the visual quality of the site and virtually eliminate those attributes of size and visual quality that qualify the site as a park of state-wide significance. Further, reversion and development basedon this thin showing of need would impair the safety of the remaining recreational acreage from future military initiatives to reclaim and develop the proeprty.

3. Public Access. Sections 30210 through 30214 of the Coastal Act state strong policies for protecting and encouraging public access to the sea. Section 30210 requires that:

> ...maximum access and recreational opportunities shall be provided for all people consistent with public safety needs and the need to protect public rights.

In addition, Section 30211 provides, in part:

> Development shall not interfere with the public's right of access to the sea where acquired through use of legislative authorization...

Section 30213 provides recreational policies:

> Lower cost visitor and recreational facilities shall be protected, encouraged, and where feasible, provided. Developments providing public recreational opportunities are preferred.

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Although the proposed development is not on the shoreline, the site is one of the few shoreline areas suitable for enhancing coastal recreation, and presently provides free recreational use for hikers, visual access to the sea, and a physical access connection between upland development and the sea. The construction of 170 single-family dwellings adjacent to this heavily used

beach area will have adverse cumulative impacts on the public's use of the beach at Royal Palms Beach Park and White Point County Beach. The beach is particularly attractive due to its unique setting with majestic palm-lined terraces descending to tide pools. It is one of the most heavily used beaches in Los Angeles and is a popular surfing area. Lifeguards are provided year round.

167 (Con't)

Although this project does not directly block public access, it would contribute to displacement of existing or potential public use, contrary to Coastal Act policies protecting public access. Further, by eliminating the development of a State park which was to have included campsites, the project would significantly diminish coastal access opportunities, particularly for low income persons, who live too far from the coast for day trips to the shore. The development of 40 acres of White Point for military housing is not consistent with the Coastal Act direction to provide maximum access to the sea and or to provide lower cost recreational facilities where feasible. The Commission therefore objects to the consistency determination made by the Air Force.

4. Species Protection. Section 30240 of the Coastal Act provides that:

> Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Section 30107.5 defines environmentally sensitive areas as:

> any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem which could be easily disturbed or degraded by human activities and development.

The White Point site is habitat for the rare and endangered Palos Verdes Blue Butterfly (Glaucopsyche lygdamus palosverdesensis). The butterfly occurs only on the Palos Verdes Peninsula, where it inhabits cool, fog shrouded seaward canyons and terraces characterized by the coastal sage-scrub plant community. Adults are closely associated with the larval food plant locoweed (Astragalus trichopodus). While White Point is typical of the coastal sage scrub plant community, many of the species of plants have been introduces and have since naturalized. Six of the 56 plant species identified on the site are native--Milkweed (Asclepias fascicularis), Goldenbush (Haplopappus venetus ssp. vernonioides), Malacothrix (Malacothrix saxatilis), Spurge (Euphorbia [illegible]), Locoweed (Astragalus trichopodus ssp. [illegible]), and Lupin (Lupinus succulentus).

The Air Force is involved in a consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. According to the draft EIS for this project, they will complete the consultation after the March 1986

survey of the site. To date, surveys of the entire White Point site have found Astragalus but have found no evidence of the butterfly. The 40 acres presently proposed for development have previously been disked by the City of Los Angeles for fire control and do not include any area of Astragalus habitat. According to the consistency determination, there is no environmentally sensitive habitat on the site and the project is therefore consistent with the CCMP. Because the Air Force is involved in a Section 7 consultation and indicates in the draft EIS that they will be bound by the results of that consultation, and because the new surveys performed on behalf of the Air Force have not indicated any direct or indirect evidence of the Palos Verdes blue butterfly on the site, the Commission finds that the project does not conflict with Section 30240 of the Coastal Act.

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5. Alternatives. The fundamental issue raised by this project is whether or not there is a feasible alternative available that will reduce or avoid the impact of the project. Unfortunately neither the draft EIS nor the consistency determination provide the basis for evaluation of alternatives. The Air Force has included a number of assumptions in their analysis that inappropriately limit the scope of alternatives considered. Even more difficult is the lack of detail about the specific design needs that give rise to the proposal to re-acquire 40 acres rather than some lesser area. The EIS does not present the site plan that the Air Force proposes. Instead, the EIS simply states, "Conceptual siting plans and engineering designs have not been developed for the proposed action." The Air Force has used local development densities as a constraint, and has not analyzed various development scenarios in sufficient detail to be able to draw clear conclusions about either the feasibility or impact of those alternatives.

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Alternatives that need to be considered fall into several different general categories: alternative sites, alternative development configurations (especially alternative densities of development), and alternatives to construction of new housing such as maintaining or increasing existing housing allowances. The draft EIS devotes substantial effort to evaluating the first category of alternatives, and virtually no attention to the other two categories.

a. Alternative Sites. The Air Force looked at alternative sites in the draft EIS (see Exhibits 5-12). However, the Air Force limited their consideration of alternative sites to land already owned by the Federal government or where the Federal government has a reversionary interest on the land. The Air Force adopted this constraint because "Congress specifically denied funds to purchase land for this project." Consistent with that constraint, the Air Force looked at 17 regional alternative sites, and three local sites: White Point, Bogdanovich Park, and the Upper Reservation of Fort MacArthur. Generally the Air Force's rationale for rejecting all of any of the regional alternatives is that none is feasible. The size or use limitations of the 17 sites are presented in enough detail to demonstrate that selection of any of those 17 sites is not feasible without some site acquisition funds.

For the three local alternative sites, the Air Force evaluated a set of eight alternatives that consist of various combinations of the alternative sites (see Exhibits 5-12, taken from the EIS). However, in the case of these eight

alternatives, the evaluation is not in sufficient detail to demonstrate that none of the alternatives is feasible. In the case of an alternative suggested by the City of Los Angeles, alternative D, the EIS simply states:

> The USAF does not concur with this proposal as the 9 acres is not sufficient for a housing density compatible with the surrounding residential development (across Weymouth Ave.)

170 Similar problems exist with much of the Air Force's consideration of the other seven local alternatives. For example, Fort MacArthur is rejected as a potential site for housing based on the added cost of demolishing existing buildings, but that cost of demolition is not provided to support that conclusion. Although little information is provided, it appears that design considerations are at the heart of most of the Air Force's consideration of alternatives. Design is a legitimate and important constraint, but not the only one to be considered. Further, the Commission is concerned that the Air Force has unnecessarily and inappropriately limited alternatives to those involving Federal ownership without weighing the actual merits of other

171 possible alternative sites. Although the cost of acquisition might eventually rule out selection of an otherwise suitable site, it does not seem prudent to use cost to arbitrarily rule out most alternatives at the preliminary stage, particularly when dealing with a project as controversial as this proposal.

b. Alternative Densities. As noted earlier, there is no site plan presented by the Air Force which illustrates the development concept. Such a site plan might provide a basis for looking at higher density development that might involve less of White Point. The Air Force did not evaluate the use of higher densities as an alternative. Rather, the Air Force used what they believed was the surrounding communities desire for lower density housing as a constraint in their evaluation of alternatives. Careful consideration of the density of surrounding housing, however, reveals that substantially higher densities are present, and existing zoning allows a substantially higher density than is proposed by the Air Force. Indeed, when other surrounding development is examined - particularly the density of the nearby Navy officer housing - it seems that the Air Force has used the density of surrounding housing selectively to support their previous decision to locate housing at

172 White Point.

The Commission cannot select a particular alternative development density without benefit of an EIS that carefully examines alternative densities. Also absent is a rationale for the Air Force's preliminary development configurations as well as the design assumptions which underlie critical conclusions about what can and cannot be built. However, the Commission can point out some additional alternatives that must be evaluated. For example, the EIS simply concludes that the Bogdanovich Park site is suitable for only 90 units, with the density of selectively considered surrounding development the only rationale for that conclusion. In fact, substantially more units could be sited on Bogdanovich consistent with the zoning of adjacent land. Existing zoning immediately west of Bogdanovich Park is R02, which allows up to 12 units per acre. Staff from the City of Los Angeles has indicated that such density would be suitable for a housing development at the park. At such an intensity, the 22 acres of Bogdanovich Park could easily accommodate 170 units. Alternatively, the lowest intensity zoning surrounding Bogdanovich Park allows up to seven units per acre based on overall acreage. This would allow 154 units at Bogdanovich, and leave only 16 units to be located elsewhere.

Even if the Air Force wants to limit development entirely to detached single-family structures with fairly large lots, substantially more development could be placed at Bogdanovich than indicated in the EIS. If the inherent design assumption used by the Air Force is that all development must be detached single-family dwellings, more than 90 units could be developed at Bogdanovich under a number of different configurations. If the lot size were 5000 sq. ft. (100 ft. by 50 ft.), if only 16 acres of the site are flat enough to develop, and if about 1/3 of the site is used for roads and utilities, 104 lots could still be developed (4.7 units per acre). More lots could be accommodated with more modest lot sizes. For example 137 lots measuring 95 ft. by 40 ft. could be developed (6.2 units per acre). All of these lots could be developed with single-story structures of the Air Force's minimum square footage and still leave substantial room for yards.

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Mixed-use development would allow even greater flexibility to reflect the different grades of the officers to be housed. The adjacent Navy officer housing has a density of 5.6 units per acre in a mixed use configuration. At this density, Bogdanovich Park could accommodate 123 units, leaving only 47 units to be sited elsewhere. If those 47 units were to be sited at White Point, as proposed by the City, they could be located on the 9 acres suggested by the City of Los Angeles at a density of 5.2 units per acre. In short, Bogdanovich Park can easily accommodate more than 90 units. The EIS fails to either establish a compelling basis for the selected density or to evaluate alternative densities. Given the direction of the Coastal Commission in its June 1985 review of this project to consider alternative sites and intensities, and given the proposal of the City for 170 units in a specific configuration at Bogdanovich Park and White Point, the failure of the EIS and consistency determination to analyze other possible development configurations is a serious and inexplicable flaw. In light of this background, the level of analysis in the EIS and consistency determination does not provide any basis for concluding that the proposed alternative is the least environmentally damaging feasible alternative.

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c. Alternatives Not Involving Construction. The EIS evaluates three alternatives that do not directly involve new construction: leased housing, purchase of existing units or land, and private construction under a long-term lease. Regarding leased housing, the EIS points out that the leased housing program was eliminated by Congress and replaced with the variable housing allowance. Regarding purchase of existing units, the EIS points out that the limitations on funding in the present legislation make that alternative infeasible. Regarding private construction, the EIS discusses the preliminary status of this alternative as an option available to the Department of Defense only on a trial basis. For all three options, the Commission concludes that the EIR demonstrates serious problems with the feasibility or reasonableness of those alternatives.

However, the EIS contains no detailed discussion of two alternatives discussed at some length by the Commission in their previous objection to re-acquisition of land at White Point: continuation of the housing allowance, and purchase or renting of homes by military officers. In its previous review, the Commission concluded that the housing allowance and tax benefits of home ownership made purchase of homes a possible feasible option for military officers, particularly when the benefits of accumulating equity are considered. Typical monthly rental prices are below mortgage costs. Since that time, mortgage rates have dropped, improving the feasibility of

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175 (Con't)

purchase. Yet the EIS includes no analysis of home ownership or rental using existing housing stock. The Commission cannot conclude from the information available in the EIS whether or not these are reasonable alternatives, however, the Commission incorporates its original findings in these respects to note that analysis of those alternatives is an essential part of the environmental review process.

6. Conclusion. The Commission recognizes that there is a national interest in making reasonable provision for housing for military installations within the coastal zone. However, in each instance this interest must be weighed against other national interests which the California Coastal Management Program serves consistent with the federal Coastal Zone Management Act. In this particular case, those other interests include preservation of scenic coastal areas for public recreation and access uses.

The Commission, however, must choose between competing interests only when they are mutually exclusive. In this case, such a choice is not necessary. Rather, it appears to the Commission that the both objectives can be accomplished simply by selecting the alternative housing project proposed by the City of Los Angeles. That alternative involves some loss of recreational area, both in Bogdanovich Park and at White Point, but preserves enough of White Point so that State Parks remains interested in establishing a State Park there. That alternative might also involve some loss of housing amenities for Air Force officers, but would allow development of the 170 units at an average density of under 5.5 units per acre. Neither the draft EIS nor the consistency determination present compelling information to demonstrate

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that this alternative is not feasible. Instead the draft EIS declines to evaluate the alternative. Since the above analysis demonstrates that this alternative and several other alternatives would substantially reduce the identified impact while still providing for development of 170 units of military housing, the Commission finds that they represent reasonable and feasible alternatives. The Air Force's continued reluctance to look seriously at alternatives to White Point, or even to reveal their proposed site plan for White Point, has seriously interfered with the orderly process of evaluating this project. For these reasons, the Commission objects to the consistency determination made by the Air Force.

WRITTEN STATEMENT
AIR FORCE, SPACE DIVISION HOUSING SAN PEDRO, CA
(Submit to Hearing Officer at Public Hearing on April 22, 1986 or mail to: HQ Space Division/DEV, Attn: Mr. Mason, P.O. Box 92960, Los Angeles, CA 90009-2960. Mailed statements should be submitted by May 27, 1986.)

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Dear Sir,

I don't want you to take my farm away. So you build housing for the air force some place else.

I want to grow food to eat and enjoy coming to work here. It is nice to come here and and work. It is nice for all the people. It is like a family place for us.

FRANK MATTERA
NAME (PRINT)
1915 Roseglen
STREET ADDRESS
San Pedro Calif 90731
CITY, STATE ZIP CODE

Typewritten Translation of Frank Mattera

Dear Sir,

I don't want you to take my farm away. So you build housing for the air force some place else.

I want to grow food to eat and enjoy coming to work here. It is nice to come here and and work. It is nice for all the people. It is like a family place for us.

Frank Mattera
1915 Roseglen
San Pedro, Calif. 90731

21 May 1986

Mr. Mason
HQ Space Division/DEV
P.O. Box 92960
Los Angeles, CA 90009-2960

RE: Witten Statement
Air Force Space Division Houseing San Pedro, CA

Mr. Mason:

I writing to you to express my concern of the possible closing of the White Point Community Garden.

The community garden means a great deal to many of us elderly gentlemen here in San Pedro. It provides my wife and I with much of the produce we consume. Having these fresh vegetables helps cut down on our grocery bill and we know that we are getting fresh vegetables.

178

However there's more to it than that. Being of retirement age, there's not much left in my life. Having this garden has given me much to look forward to and plan for. I spend a great deal of my free time gardening and enjoy it tremdously. If this garden were to be closed, it would mean the end of myself. I wouldn't know what to do with myself. There is no other pleasure I have such as gardening.

If there is no way for me to purs[illegible]de you to reconsider, I hope that considerations have been made to allocate some land for us at some other location. However, you must realize that it would be an added expense to us to re-prepare the land.

Please allow us to keep the White Point Community Garden where it is and please consider building the Airforce Housing in some other location.

Thank you very much!

Leonardo Bologna

Leonardo Bologna
1067 W. 20th St.
San Pedro, CA 90731

22 May 1986

Mr. Mason
HQ Space Division/DEV
P.O. Box 92960
Los Angeles, CA 90009-2960

RE: Witten Statement
Air Force Space Division Houseing San Pedro, CA

Mr. Mason:

179

I writing to you to express my concern of the possible relocation of the White Point Community Garden.

The community garden means a great deal to me for many reasons. It provides my family and I with wonderful fresh vegetables. It's also a wonderful place to relax, garden, and enjoy the company of the other gardeners nearby.

The people all enjoy the use of the garden, and you can imagine just how much it helps their pocket book to be growing these fresh vegetables.

If there is no way for me to pursade you to reconsider, I hope that considerations have been made to allocate some land for us at some other location.

Please allow us to keep the White Point Community Garden where it is and please consider building the Airforce Housing in some other location.

Thank you very much!

Giuseppe Cracchiolo
1341 21st St.
San Pedro, CA 90731

Giuseppe Cracchiolo

5/26/86

HQ Space Division
ATT: Mr Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Dear Sir:

Although I do not have any space in the gardens at White Point, members of my family have been gardening there; it has helped them since they are on a limited income and growing their own fruits & vegetables helps them a great deal.

180

Please do not change the location

Thank you

Josephine Tuberosi

Josephine Tuberosi
2025 Upland
San Pedro, CA 90732
(213) 831-5722

Typewritten Translation of Josephine Tuberosi

5/26/86

HQ Space Division
ATT: Mr. Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Dear Sir:

Although I do not have any space in the gardens at White Point, members of my family have been gardening there; it has helped them since they are on a limited income and growing their own fruits & vegetables helps them a great deal.

Please do not change the location.

Thank you
Josephine Tuberosi

Josephine Tuberosi
2025 Upland
San Pedro, CA 90732
(213) 831-5722

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814
916/323-7480

GEORGE DEUKMEJIAN
GOVERNOR

DATE: May 30, 1986

TO: Mr. Robert Mason
Dept. of the Air Force
Post Office Box 92960
Los Angeles 90009-2960

FROM: Office of Planning and Research
State Clearinghouse

RE: SCH 85122709---Draft EIS, Air Force Housing, San Pedro Area, Los Angeles County.

As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

181 This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Huston T. Carlyle, Jr.
Director, Office of Planning and Research

Attachment

cc: Applicant

State of California The Resources Agency

Memorandum

To : Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Attn: Projects Coordinator
Resources Agency

Date : May 26, 1986

From : Department of Fish and Game

Subject: Draft EIS: U.S. Air Force Housing, San Pedro Area, Los Angeles County - SCH 85112709

182 The project includes construction of 170 single-family dwellings in the White Point area of San Pedro. Possible impacts could occur to the Palos Verde Blue Butterfly (PVBB) and/or its host plant, Astragalus trichopodus var. lonchus. Our comments address the proposed project, not the alternatives because our main concern is with the PVBB and its host plant.

On page 5-24 the text states that "The results of recent surveys for the endangered butterfly and its required resources indicate that the Proposed Action would not cause adverse impacts to the butterfly or its habitat. In the 1983, 1984, 1985, and 1986 surveys of the entire Palos Verdes Peninsula, no Palos Verdes blue butterflies were identified. The U.S. Air Force will prepare and submit a no jeopardy opinion on the PVBB which will complete Section 7 consultation with the FWS in accordance with the Endangered Species Act of 1983." We do not yet agree with this premise. Because of past development within PVBB habitat, and because of continued weed abatement and fire control measures, the host plant has been extirpated from many former areas of the peninsula, but not all of them. On the previous page, 5-23, the text states that "Under present conditions the Astragalus resources are not of use to the Palos Verde blue and is not expected to become a significant resource without direct intervention."

183 Unless the host plants were screened to preclude with certainty the presence of the PVBB, it would not be correct to assume that they are not of use to the PVBB. It may be that this rationale exists because of the paucity of numbers of the host plant. If any remain, it is possible that a matuare female PVBB could find a lone host plant and deposit her eggs. However, we agree with the text that this area "is not expected to become a sigificant resource without direct intervention." However, because the potential exists to destroy potential PVBB habitat, the Department believes a "No Jeopardy" statement should not be accepted at this time.

184 We recommend that the proposed project area having the potential for host plant restoration and/or rehabilitation should be identified by the Department and the U.S. Fish and Wildlife Service prior to project implementation. The restoration and management of these areas could mitigate for the loss of other wildlife habitat within the project area. Project design should include measures that will protect these reestablished areas from urban development, and such associated impacts as urban runoff and widespread landscaping.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Fred A. Worthley, Regional Manager of Region 5, at 245 W. Broadway, Suite 350, Long Beach, CA 90802-4467; telephone number (213) 590-5113.

Jack C. Parnell
Director

State of California — The Resources Agency of California

Memorandum

Date : May 27, 1986

To : Gordon F. Snow, Ph.D.
Project Coordinator
Resources Agency

From : Department of Parks and Recreation - Richard G. Rayburn

Subject: Air Force Space Division Housing Project - White Point
Draft Environmental Impact Statement
SCH #85112709

The Department of Parks and Recreation (DPR) has reviewed the subject document for the proposed project's effects on our potential development of the property as the White Point unit of the State Park System. The current proposal is very similar to the one we commented on two years ago: Environmental Assessment, Space Division Proposed Housing, White Point, SCH #84090504 (memo to Gordon Snow September 21, 1984).

185 The current DEIS presents a misleading and negative comparison between the proposed military housing and our potential recreational development of a unit of the State Park System. The Department of the Air Force (DAF) environmental analyses focus on:

1. the unattractive appearance of State Park System (SPS) facilities such as visitor parking areas, day use areas, and campgrounds;
2. cumulative impacts to air quality as a result of SPS development;
3. the level of security needed for control of criminal acts arising from the broad spectrum of SPS users; and
4. controversy about the minimum site size needed for the development of a State Park System unit.

This document goes beyond its purported purpose of addressing the construction and operation of military family housing units. It inappropriately suggests arguments against the development of recreational and park facilities at White Point. The concerns of the community about any negative aspects of SPS unit development should be addressed in the State's own cumulative environmental assessment, not in this document prepared by the DAF, with its competing land use interests.

186 The DEIS addresses only local or regional recreational needs and availabilities, and fails to acknowledge or address the recreational deficiencies identified by both State and federally sponsored recreational studies within the Los Angeles coastal zone. This Department's proposed recreational development of the combined White Point/Royal Palms State Beach properties responds to those identified recreational deficiencies.

187 Section 4.11.1.3, Public Service, is a particularly misleading presentation of current criminal/public nuisance activities and of DPR's law enforcement capabilities. The DEIS inconsistently states that "crime problems in the White Point area are a major concern of the police department and the local community... however, the police have stated that they have few reports of criminal activity at the beach" (Royal Palms State Beach) (emphasis added). As a general rule, State beaches and parks do not require twenty-four hour patrol because of the low occurrence of crime. When problems do arise in a particular area, DPR will take whatever steps are necessary to provide adequate security.

188 Regarding the size and classification of State Park System units, some State Historic Parks are as small as four or five acres; however, State Parks, by definition, usually consist of relatively spacious areas. The smallest is Fremont Peak State Park at 244 acres, and the largest is Anza-Borrego Desert State Park at about 550,000 acres; the median size is about 6,000 acres. The size of the site at White Point is critical because "the site in its entirety possesses sufficient State significance for inclusion in the State Park System. If however, 50 acres of the site were converted to military housing, recreation development opportunities would be greatly reduced. The resources would be adversely affected, and the area's open-space character would be altered sufficiently to preclude the Department's ability to develop a park of statewide significance" (White Point Feasibility Study, DPR, July 1984).

189 Table 1, page v, purports to list eight alternative configurations for USAF housing; however, the accompanying footnotes immediately reject five of the eight configurations. This facile disposal suggests a less than objective proposal and evaluation of project alternatives. Most disappointing to us is the rejection of Alternative D, proposed by the City of Los Angeles, which appears to be a suitable resolution of the competing land use proposals.

190 Data on housing density cited for Alternative D appear to be incorrect. Figures on numbers of housing units for White Point and Bogdanovich Park conflict with site plans prepared by the City of Los Angeles. There is a significant difference in the density being considered, depending on which data are used in the analysis. This discrepancy should be examined and resolved, since the information is critical to objective evaluation of Alternative D.

Our contact for this project is James M. Doyle, Supervisor, Environmental Review Section, P.O. Box 2390, Sacramento, CA 95811; telephone (916) 324-6421.

Richard G. Rayburn, Chief
Resource Protection Division

2.0 PUBLIC COMMENTS: HEARING TRANSCRIPT

CEQ regulations require that the U.S. Air Force (USAF) make diligent efforts to involve the public in preparing and implementing NEPA procedures (40 CFR 1506.6). These regulations require that a public hearing be held to solicit public comment on the DEIS if there is substantial environmental controversy concerning the proposed action. In accordance with these requirements, a public hearing was held from 5:30 to 10:00 p.m. on April 22, 1986, at Peck Park Auditorium in San Pedro, CA.

This section contains the transcript of the public hearing as submitted by the Certified Shorthand Reporter. In addition to the transcript recorded by the shorthand reporter, audio and video recordings were made of the public hearing. These recordings were reviewed to ensure that all public comments were accurately recorded. An addendum of errata and corrections to the transcript precedes the actual transcript.

In accordance with CEQ regulations (40 CFR 1503.4), the USAF is required to assess and consider comments to the DEIS and respond to these comments in the FEIS. Responses to the comments received at the public hearing are contained in Section 3.0.

PUBLIC HEARING

DRAFT ENVIRONMENTAL IMPA[illegible]TATEMENT

FOR AIR FORCE, SPACE DIVISION HOUSING

SAN PEDRO, CALIFORNIA

APRIL 22, 1986

REPORTED BY
NORMAN E. HARVEY, CSR #3533

DEPO NO. 6-259

NORMAN HARVEY & ASSOCIATES
CERTIFIED SHORTHAND REPORTERS
1875 W. REDONDO BEACH BLVD.
SUITE 100
GARDENA, CA 90247
(213) 327-4701

PUBLIC HEARING

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR AIR FORCE, SPACE DIVISION HOUSING

SAN PEDRO, CALIFORNIA

APRIL 22, 1986

TRANSCRIPT OF PROCEEDINGS taken at Peck Park Auditorium, San Pedro, California, at 5:30 P.M., Tuesday, April 22, 1986, before NORMAN E. HARVEY, CSR #3533, a Notary Public within and for the County of Los Angeles, State of California, pursuant to Public Notice.

PANEL MEMBERS
IN ATTENDANCE:

LT. COL. SWEENEY
CAPT. MONDL
COL. RODGERS
LT. COL. COLE
MAJ. GREINER
MR. MASON
MR. DOOLITTLE
MR. PANDORF

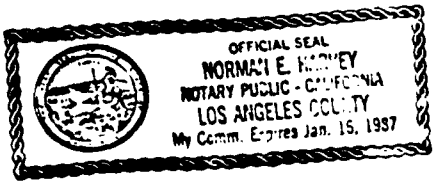
STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, NORMAN E. HARVEY, a Certified Shorthand Reporter, No. 3533, hereby certify that the attached addendum is a corrected copy of the original transcript of proceedings taken before me on April 22, 1986, at San Pedro, California, as thereon stated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Gardena, California, this 3rd day of June, 1986.

Norman E. Harvey
Notary Public in and for the
State of California



Corrections to Transcript of LAAFS Housing Project
San Pedro, California, Public Hearing on April 22, 1986,
Based on Video and Audio Recordings

Page 3, Line 14
change "proposal are for" to "actions include various configurations of"

Page 3, Line 22
change "trials judge" to "world wide Trial Judiciary"

Page 4, Line 21
change "reported" to "recorded"

Page 9, Line 23
change "housing units, units on" to "housing units on 40 acres at White Point"

Page 9, Line 26
insert after Act "and Regulations of Presidents Council on Environmental Quality,"

Page 10, Line 6
change "quality group" to "impact analysis process"

Page 10, Line 14
change "applies to the" to "qualifies for a categorical exclusion"

Page 10, Line 15
change "requires" to "or requires"

Page 10, Line 22
change "analysis" to "planning"

Page 10, Line 25
change "needs it" to "needs an environmental assessment"

Page 11, Line 1
change "lead to a decision, to a finding of those significant impacts to assist us in preparing an environmental statement or to take" to "lead to a decision to prepare an EIS, a finding of no significant impact (FONSI), or a decision to take"

Page 11, Line 12
change "for the project" to "parcel at White Point from the City of Los Angeles"

Page 11, Line 14
change "The city" to "The opposition from the city"

Page 11, Line 28
change "emphasize significant" to "de-emphasize insignificant"

Page 12, Line 2
change "statement and the" to "impact statement analysis accordingly, scoping results in the"

Page 12, Line 2
change "facts" to "actions"

Page 12, Line 8
change "input of" to "input obtained in the public scoping meeting and"

Page 12, Line 12
change "public hearing" to "publishing"

Page 12, Line 13
change "3-19-86" to "April 3, 1986"

Page 12, Line 17
change "the availability" to "the impact statement availability"

Page 13, Line 9
change "significant" to "expected significant"

Page 13, Line 12
change "measurement" to "mitigative measures"

Page 13, Line 14
change "Additions to" to "A decision on"

Page 13, Line 25
change "proponents select" to "proponent is encouraged to define reasonable selection"

Page 14, Line 15
change "the site for the housing is to be in direct relationship to the surrounding land usage:" to "the site not causing us to be unfavorably located in relationship to objectionable land uses or relationship with hazardous uses."

Page 14, Line 28
change "Bogdanovich" to "Bogdanovich Park"

Page 15, Line 5
change "parcel" to "parcel and formerly a U.S. Army Nike Missle site."

Page 15, Line 7
change "acres" to "acres south of Paseo del Mar"

Page 15, Line 15
change "reserve" to "revert"

Page 15, Line 22
change "transfer of the property" to "transfer agreement for this property"

Page 16, Line 3
change "Interior." to "Interior, being declared excess by the Army. The national defense reversionary clause is applicable to this portion of the Reservation."

Page 16, Line 13
change "includes" to "includes the Korean Bell site,"

Page 17, Line 9
change "changed to" to "originally planned for"

Page 18, Line 26
change "Council" to "and Advisory Council"

Page 19, Line 1
change "a variety of" to "an existing variety of"

Page 19, line 2
change "an alternative site" to "alternative A"

Page 19, Line 3
change "of vegetation" to "of milk-vetch plant"

Page 19, Line 5
change "It is" to "Alternative A is"

Page 19, Line 7
change "park than" to "park compared to the proposed action in the"

Page 19, Line 11
Speaker's name is "Mr. Dennis Weyrauch"

Page 21, Line 16
change "This section on 3.6, .4 and 5," to "I have read sections 3.6 4.4 on fauna

Page 21, Line 17
change "3.6118" to "3.6.18"

Page 23, Line 3
change "by then" to "some point in the future"

Page 23, following line 7
insert "SPEAKER: This made it sound like the legal document was the problem"

Page 24, Line 17
change "more onsite" to "more thorough onsite"

Page 24, Line 18
change "possibly water" to "possibly air"

Page 24, Line 24
change "savory" to "sterling"

Page 25, Line 2
change "Sacramento and" to "Sacramento, Sharpe Army Depot in Lathrop and"

Page 25, Line 7
change "That" to "That study"

Page 26, Line 2
change "create" to "treat"

Page 26, Line 28
change "essentially" to "socially"

Page 27, Line 12
change "lower" to "clearer"

Page 27, Line 17
change "developed" to "documented"

Page 27, Line 17
change "natural" to "actual"

Page 29, Line 11
change "point, 33.4" to "later point, H B 33.4"

Page 29, Line 19
change "be in" to "begin"

Page 30, Line 5
change "convey deep" to "convey my deep"

Page 30, Line 12
change "site any" to "delete any"

Page 30, Line 20
change "*Foods and he*" to "*Foods and Yogoslav* - American Club of San Pedro and he"

Page 30, Line 22
change "B, C" to "B, C, D"

Page 31, Line 1
change "option 3.1-1" to option 3.2 Figure 3.1-1"

Page 31, Line 22
change "(inaudible)" to "Ung"

Page 32, Line 4
change "prepared" to "presented"

Page 32, Line 20
change "property" to "coastal property"

Page 32, Line 28
change "presenting" to "protecting"

Page 33, Line 7
change "continue to" to "continue to offer to"

Page 33, Line 11
change "process. We urge" to "process, which urged"

Page 33, Line 23 & 25
Speaker's name is "Mr. Alan Ulm"

Page 34, Line 4
change "regional" to "or regional"

Page 34, Line 5
change "of a combined" to "of the combined"

Page 34, Line 6
change "properties meeting" to "properties in meeting"

Page 34, Line 7
change "deficiencies lie" to "deficiencies. Deficiencies lie"

Page 34, Line 11
change "admission" to "omission"

Page 34, Line 12
change "verbal written" to "verbal and written"

Page 34, Line 14
change "of the capabilities" to "of the mission and capabilities"

Page 34, Line 17
change "recreational" to "regional"

Page 35, Line 6
change "Point. There" to "Point. And I think if you lump all state parks together thats an error. There"

Page 35, Line 15
change "smaller than the" to "smaller than Fremont Park. The"

Page 35, Line 19
change "acknowledge the" to "acknowledge satisfactorily the"

Page 35, Line 26
change "ecological" to "paleontological as well as archaeological"

Page 35, Line 28
change "turning" to "determining"

Page 36, Line 4
change "White Point" to "White Point for housing"

Page 36, Line 7
change "Holme" to "Ulm"

Page 36, Line 8 and 10
Speaker's name is "Mr. John Gault"

Page 36, Line 11
change "idea" to "aim"

Page 36, Line 12
change "use of" to "use of native"

Page 36, Line 20
change "new vegetation" to "lupine"

Page 36, Line 21
change "stream" to "spring"

Page 36, Line 23
change "flora." to "flora and develop a beautiful botanical garden here of California native plants - a sounder ecological idea than hundreds of sprinklers watering lawns in the area"

Page 37, Line 11
change "the migratory birds" to "the exhausted birds"

Page 37, Line 14 and 16
Speaker's name is "Ms. Marion Morgan"

Page 37, Line 27
change "support has" to "support for such a park has"

Page 38, Line 2
change "as well" to "as well as the League of Women Voters."

Page 38, Line 2
change "These positions have been reached after concentrated study and consenus" to "Our league arrived at the decision in 1984, has written letters and testified at hearings to that position which has not changed."

Page 38, Line 10
change "If the" to "If a significant portion of the"

Page 38, Line 18 and 20
Speaker's name is "Mr. Paul Nevans"

Page 40, Line 14
Speaker's name is "Mr. Paul Nevans"

Page 40, Line 19 and 21
Speaker's name is "Mr. James Hurt"

Page 40, Line 24
change "to preserve a salary source for our area which is" to "to address preservation of a vital resource to our area and our nation and our state, that is the men and women of the Space Division which is"

Page 41, Line 7
change "orbital operation and" to "orbit operation of DOD boosters and"

Page 41, Line 10
change "about --" to "about today --"

Page 41, Line 13
change "this in" to "this advantage in"

Page 41, Line 28
change "allotments the" to "allotments or moving expenses the"

Page 42, Line 4
change "The study" to "Every study"

Page 42, Line 25 and 27
Speaker's name is "Mr. Richard Hubacek"

Page 43, Line 4
change "is a figure" to "is the effect"

Page 43, Line 12
change "preservation" to "creation"

Page 43, Line 20
change "are missing." to "are missing which make it hard to comment."

Page 43, Line 26
change "disposing of the" to "disposing of asbestos, a"

Page 44, Line 23
change "any different population" to "significant resident populations"

Page 45, Line 1
change "remaining habitat" to "remaining undeveloped habitat"

Page 45, Line 3
change "pond" to "fauna"

Page 45, Line 8
change "various capacities" to "carrying capacities"

Page 45, Line 8
change "seeding for the various birds" to "seed eating and insectivorous birds"

Page 45, Line 11
change "would seriously deteriorate, an important food source for migratorial birds" to "would further decrease the already severly limited prey resource for the raptorial birds"

Page 45, Line 18
change "Although endangered" to "Although no endangered"

Page 45, Line 21
change "fight and keep" to "fight to keep"

Page 47, Line 23
change "I'm sort of interested" to "I'll sort of end it"

Page 49, Line 12
change "Promotional" to "Cultural"

Page 49, Line 18
change "Garden Club, and" to "Garden Club, San Pedro Planning Alliance, and"

Page 50, Line 5
change "desirable" to "paramount"

Page 51, Line 15, 17
Speaker's name is "Mr. Jacob Gutherree"

Page 54, Line 19
Speaker's name is "Mr. Gutherree"

Page 54, Line 20, 22
Speaker's name is "Mr. Dennis Weyrauch"

Page 54, Line 28
change "My students recognize the tidal area offshore" to "My marine science students utilize the tidal shore and offshore areas"

Page 55, Line 5
change "study science" to "study marine science"

Page 55, Line 16
Insert "We've done line transects of some of the native plants." after "animals."

Page 55, Line 23
change "of things" to "of things, because they have a tremendous impact on things"

Page 56, Line 16
change "heron," to "heron and a cattle egret,"

Page 57, Line 5
change "Station. Prior" to "Station. I'm responsible for the morale, welfare and housing in this case of our troops. Prior"

Page 57, Line 23
change "Pedrans. They" to "Pedrans. Air Force is what we do for a living. They"

Page 60, Line 17
change "development" to "document"

Page 60, Line 27
change "admissions" to "omissions"

Page 61, Line 5
change "media," to "immediate"

Page 61, Line 7
change "hearing 37" to "hearing 31 of 37"

Page 61, Line 12
change ", the fact" to ", you minimize the fact"

Page 61, Line 12
change "147" to "124"

Page 61, Line 17
change "problems" to "funding problems"

Page 61, Line 19
change "confines their" to "can find the"

Page 61, Line 23
change "homeowners. Thirty-four" to "homeowners in order to provide adequate space for a functional park. Removing thirty-four"

Page 61, Line 28
change "also heard, as you" to "also heard, and we were convinced, that if the number of camping sites was minimized to 55 within the canyon, immune from the homeowners, we can live with it. And, as you"

Page 62, Line 12
change "houses. They" to "houses. They refer to traffic impacts. They"

Page 62, Line 26
change "are not." to "are not your burden."

Page 62, Line 28
change "activity" to "objectivity"

Page 63, Line 21
change "other property is associated around that property. We" to "our property is zoned around the property which is R-1 - 1XL which permits 2 to 7 units per acre to be developed in land areas for residential use including the plan they they devised on the Bogdanovich/White Point combination which they average out well over 6 units per acre. We"

Page 63, Line 28
change "residential". How" to "residential in Alternative A which was designed on original action on the Wester Ridge which was some 50 acres directly across from that, there is a scenic public view from 25th and Western. How"

Page 64, Line 3
change "Alpha Beta." to "and Navy housing."

Page 64, Line 9
change "scope." to "scope of contact."

Page 64, Line 14
change "neighborhood." to "neighborhood, but lives in San Pedro."

Page 64, Line 19
change "us fairly" to "these flaws carefully."

Page 64, Line 24
change "subject" to "study"

Page 65, Line 24, 25
Speaker's name is "Mrs. Martha Angevine"

Page 66, Line 9
change "have three freeways" to "have a freeway"

Page 66, Line 16, 18
Speaker's name is "Mrs. Rose Fobrich"

Page 66, Line 28
change "Fort Long Beach" to "Fort Walton Beach"

Page 69, Line 3
change "the housing is" to "we all possess"

Page 69, Line 13
Speaker's name is "Mrs. June Burlingauge Smith"

Page 70, Line 8
change "resource" to "recourse"

Page 71, Line 5, 8
Speaker's name is "Mr. William Samaras"

Page 71, Line 22
change "gap" to "gamut"

Page 72, Line 2
change "abrogating" to "abandoning"

Page 73, Line 23
change "minutes" to "comments"

Page 73, Line 26
change "specific." to "specific omission in the consideration of alternatives."

Page 74, Line 14
change "recruiting" to "rerouting"

Page 74, Line 21
change "housing" to "housing to the planned hotel area,"

Page 75, Line 11
change "60" to "16"

Page 76, Line 4
change "three locations" to "relocation"

Page 77, Line 23
change "pointer" to "monument"

Page 78, Line 15
change "our" to "ordinary"

Page 79, Line 14, 16
Speaker's name is "Mr. Alfred Sattler"

Page 79, Line 18
change "document" to "document for the ability to repeat key phrases throughout the document."

Page 81, Line 3
change "development" to "document"

Page 82, Line 9
change "normally on warrants" to "on known requirements"

Page 82, Line 24
Speaker's name is "Mr. Sattler"

Page 82, Line 25, 27
Speaker's name is Mr. Noah Modisett"

Page 84, Line 19
change "normally" to "initially"

Page 85, Line 4
change "grown," to "broken even,"

Page 85, Line 20
change "place." to "place to practice."

Page 86, Line 10
change "built-up" to "adult-owned"

Page 87, Line 24
change "If you, if," to "If"

Page 88, Line 23
change "word" to "world"

Page 89, Line 1, 3
Speaker's name is "Mr. Kirk Links"

Page 89, Line 17
change "year." to "year. The Little League has greatly expanded, lots of other programs are picking up more and more kids."

Page 89, Line 18
change "doing." to "doing. They are on the streets, they need to get them off the streets and how are they going to do that but through organized sports programs."

Page 89, Line 23
Add "With he current success in our program in 86 we stand a good chance of the program growing in 87."

Page 90, Line 2
change "There are parents trying to see getting in the way of baseball playing between kids coaching their kids, the balls, its a matter" to "There are parents trying to stand in the way of baseballs flying between kids, coaches are hitting balls, players are hitting balls, its a matter"

Page 90, Line 5
change "topographics" to "sacrifice"

Page 97, Line 19, 21
Speaker's name is "Ms. Bonnie Christensen"

Page 97, Line 28
change "seven" to "seventy"

Page 99, Line 11
change "park" to "part of it"

Page 99, Line 27
Speaker's name is "Ms. Christensen

Page 100, Line 1, 3
Speaker's name is "Mr. Vince Budrovich"

Page 103, Line 24
change "I'm not" to "I'd like to make one comment. The last speaker projected an idea that I've heard many times in the last - well, over a year, - that I've been involved with this particular project and I would like to call it the NIMBY - not in my back yard. I'm not"

Page 104, Line 5
Add "But to just say. Golly, there must be one somewhere is just simply not enough."

Page 104, Line 2, 9
Speaker's name is "Mr. John Parkak"

Page 104, Line 9
change "I am" to "I work for McDonnell Douglas Corporation, I live in San Pedro and live close to the White Point - Bogdanovich Park area, I am"

Page 105, Line 23
change "Multiple" to "Building all"

Page 106, Line 12
change "youth" to "Yugoslavic"

Page 106, Line 23, 25
Speaker's name is "Mr. Lloyd Karch"

Page 106, Line 26
change "repairing" to "preparing"

Page 108, Line 13
change "the military. It's" to "the military economy has impacted on the economy as a whole. But there isn't money for the other things. It's"

Page 108, Line 21
change "commission" to "mission"

Page 110, Line 23, 24
Speaker's name is "Mr. Karch"

Page 113, Line 3
change "and belonging" to "and land belonging"

Page 113, Line 12
change "that called for" to "in that proposal, that was"

Page 113, Line 26
change "—" to "issues"

Page 114, Line 23, 25
Speaker's name is "Mr. Art Maffei"

Page 117, Line 23
change "upper" to "Air Force"

Page 118, Line 6, 8
Speaker's name is "Mr. John Kopczak"

Page 119, Line 5, 7
Speaker's name is "Mr. Rilee Lindquist"

Page 120, Line 16
change "need. Over" to "need. And to understand that all you have to is recognize that fact that over"

Page 121, Line 4
change "that. They have appropriately sold the" to "that. If the broker who sold the houses or"

Page 121, Line 15
change "or the" to "to waste"

Page 122, Line 7
change "workers" to "organization"
change "world, and" to "world, there is no other peace organization, and"

Page 122, Line 20
insert after "Commission,"; "Organic Society, the Divers,"

Page 122, Line 23
insert after "listen --"; "they don't represent us"

Page 123, Line 14, 16
Speaker's name is "Mr. Edward Bobak"

Page 123, Line 27
change "raised. It" to "be raised. We ought to keep that the way it is. It"

Page 124, Line 5
change "neighborhood with the increase in traffic, which" to "neighborhood. I don't like the increase in crime, that"

Page 124, Line 24
change "and density and mass wastes." to "to density and mass weights."

Page 125, Line 7
change "Crenshaw" to "Crownview"

Page 126, Line 5
change "sites are suitable." to "sites that are currently contained in the study are suitable for the military housing."

Page 126, Line 11
change "specialist" to "scientist"

Page 126, Line 15
change ".25" to "4.25"

Page 126, Line 27
change "impasse" to "impacts"

Page 126, Line 28
change "impasse" to "impacts"

Page 127, Line 2
change "quantified." to "quantified as well as the pollutant loadings due to runoff from the site."

Page 127, Line 22
change "week, so" to "week, and I ended up on page 4-99, so"

Page 128, Line 3, 4
Speaker's name is "R. A. Hartlinian"

Page 128, Line 22
change "Bernard" to "Barnard"

Page 128, Line 26, 27
Speaker's name is "Mr. John Barbieri"

Page 129, Line 5
change "so of course reading the document and looking academically in the future" to "so our roots go deep and we care very deeply about the future"

Page 129, Line 19
change "alternatives. But the only one which I am unwilling to sacrifice" to "alternatives, which seem more than willing to sacrifice the only cultural asset that San Pedro has which"

Page 130, Line 6
change "the Arlington Cemetery" to "any veterans cemetery"

Page 130, Line 7
change "people" to "peace"

Page 130, Line 16
change "about this thing here" to "because listening to you"

Page 130, Line 24
change, "going and whether they are going up or down." to "going. They are going uptown."

Page 130, Line 25
change "communication with" to "building and"

Page 131, Line 11
change "or sales" to "facilities"

Page 131, Line 12
change "(inaudible)" to "impacted area"

Page 131, Line 12
change "tied" to "paid"

Page 131, Line 17, 18, 25
Speaker's name is "Ms. Lois Knight Larue"

Page 134, Line 2
change "We would like to make a further comment before the end" to "If you would like to make a further written comment before the public comment period ends."

Page 134, Line 14
change "can. We" to "can. The commissary that we"

Page 134, Line 20, 22
Speaker's name is Mrs. McCullough"

Page 135, Line 19
change "are" to "were"

Page 135, Line 21
change "$45" to "4.50 to $18 a month"

Page 136, Line 4
Add "Leave the Navy out, they are already there."

Page 136, Line 22
change "Officially," to "Officials of"

Page 137, Line 1
change "has learned" to "has developed"

Page 137, Line 2
change "other." to "beauty of our free and democratic society. Please be assured that the Air Force decision-makers will carefully consider each viewpoint raised here this evening when deciding the ultimate course of action on this proposed housing project."

San Pedro, California, Tuesday, April 22, 1986

5:30 P.M.

LT. COL. SWEENEY: Good evening, ladies and gentlemen. We'd like to get started now. It is my pleasure to welcome you here tonight to the public hearing.

The purpose of this public hearing is on the Draft Environmental Impact Statement, which has been filed by the Air Force and is currently being evaluated. This Draft Environmental Impact Statement is on the proposal for the construction and operation of 170 single-family housing units on 40 acres of the area known as White Point in San Pedro, California.

Alternatives to the proposal are for 170 units on other portions of White Point and on City of Los Angeles Department of Parks and Recreation property and Bogdanovich Park and the upper reservation of Fort MacArthur. Both of these alternative sites are also located in San Pedro, California.

My name is Lt. Col. Pat Sweeney. I'm an active Air Force trial judge currently serving as the chief judge of the Fifth Circuit United States Air Force trials judge located at Travis Air Force Base in Northern California. I have been asked to serve as the presiding officer at this hearing to see that all parties having an interest in this matter receive a fair opportunity to be heard.

The time that we have available is from now until ten o'clock this evening. Now, the purpose of your

opportunity to be heard this evening is twofold: First, it is to provide you with a chance to receive factual information about the proposed Air Force action and to ask any questions that you might have about it. In the sense that this hearing affords the Air Force the opportunity to clarify points which may have been misunderstood, it is informational.

Second, and most importantly, your opportunity to speak at this public hearing also permits the Air Force to receive representative samples of public opinion as to the anticipated environmental impact on the proposed Air Force action to construct these housing units. Your comments may be either verbal or written, and will constitute an integral part of these proceedings.

Now, I'm not here as an expert on this proposal or the Draft Environmental Impact Statement, which has been filed; although I, like many of you, have familiarized myself with the draft statement.

My principal responsibility this evening is to ensure that this hearing is conducted in an orderly fashion and is adequately reported. I have not participated in the development of this proposal and have not rendered any legal advice or assistance with respect to it. Likewise, I will not be making any recommendations or decisions with regards to whether this Air Force proposal is to proceed, be modified or abandoned.

Now, with me here on this platform this evening are Air Force officials, who are extremely knowledgeable

about the details of that proposal, and at this time I'd like to introduce Col. Rodgers, the director of acquisition, civil engineer, who is assigned to the Air Force Space Division at the Los Angeles Air Force Station. Also with us this evening to assist Col. Rodgers are several Air Force personnel and consultants to the Air Force, whom Col. Rodgers will introduce.

In a few moments Col. Rodgers will brief you about the Draft Environmental Impact Statement, the hows and whys of its preparation, the alternative options that are being considered and the anticipated environmental impacts of each of these. Following his presentation you will have an opportunity to ask him questions, either about his remarks or about the draft EIS.

The purpose of this questioning is, of course, to clarify what he has said or that which is contained within the Draft Environmental Impact Statement. And you will have ample opportunity after these questions to make comments, in either written form or orally here in this public hearing concerning the adequacy of the draft EIS.

Those of you who have already signed up to speak may wish to reserve your questions for the conclusion of your comments.

Now, a verbatim transcript of this hearing will be prepared by a qualified court reporter sitting to your right, and will be used along with written statements which any of you may care to submit in preparing the final environmental statement. This will be used by senior

decision makers in evaluating the Air Force proposal. The hearing is also being recorded by audio equipment, as well as video tape, in order to insure that the record of public comments received this evening is accurate and complete.

Now, I will explain the agenda for this evening's hearing and outline the ground rules that we will be following.

After Col. Rodgers' remarks, I will open the hearing for clarifying questions addressed to Col Rodgers, and after approximately 15 minutes of questions and answers, we will move to the presentation portion of this hearing, where those who have requested to speak will be given a chance to do so, using this podium up here in front to my right, and where time permits, after having heard from all of those who have asked to speak, we will attempt to close the evening with a question and answer session.

Those who wish to make an oral statement this evening are asked to fill out the speaker's sign-up card in the lobby, even if you earlier called and indicated a desire to speak. The card asks for your environmental area of concern and your mailing address so that you may receive a written response to your comments. If you do not wish to speak but merely wish to receive a copy of the final EIS, just say so on the card. You may also use the card to reflect your written comments instead of also making verbal statements here tonight.

You should realize that neither oral nor written statements have a higher priority, and each is afforded equal weight and will be fairly considered by

those preparing the final Environmental Impact Statement. And if you have to fill out the card and it has not yet been collected, if you will raise your hand and an Air Force officer here will collect them and give them to my administrative assistant to be sure that you are given an opportunity to speak. Now, if you wish to speak, I will be asking for strict adherence to our time restrictions for this hearing, which are as follows: There will be 10 minutes allotted to elected or other public officials, as well as those representing a group or organization; five minutes to those who are speaking for themselves. Only the first speaker representing a particular group will be allowed the 10 minutes, all others from that same group will be treated as individuals and be allowed five minutes; therefore, each group must select their own representative.

Capt. Mondl, to my right, is serving as my administrative assistant to help me with the time and other details during this hearing. Each speaker will be notified when they have one minute remaining and, if necessary, when their time is up. Time cannot be transferred from one speaker to another.

Now, I plan to strictly enforce these time restrictions solely in order to assure that as many of you who desire to speak will be given an opportunity this evening. I will attempt to group those speakers with similar areas of environmental concerns so that persons on a particular issue are heard together. The general order of speakers would be elected and public officials, representatives of groups, and

then private individuals.

Now, those who wish to submit written statements may do so tonight, or they may mail their comments to Air Force officials at the Los Angeles Air Force Station within the 45-day review and public comment period, which ends on May 27, 1986; therefore, written comments or questions about the Draft Environmental Impact Statement should be submitted by 27 May, 1986 to the following address, which is also located on the hearing handouts you may have picked up in the lobby. This address is, Headquarters Space Division/ DEV, Attention: Mr. Robert Mason, P.O. Box 92960, Los Angeles, California 90009-2960.

As I said, this is listed on the hearing handout, or I will give you that address after this hearing.

Finally, as hearing officer I want to briefly remind you of the twofold purpose of this hearing: First, to provide the public with additional means of presenting information and your comments to the decision makers on the environmental impact to your community that may result on the proposed Air Force housing act. Secondly, it provides you with an opportunity to receive actual information about the proposed action and to ask questions of knowledgeable persons about this subject.

However, this is not a trial, it is not a debate, and so I ask you that you refrain from applauding or reflecting displeasure with the comments of any speakers, as such action tends to detract from the purpose of this hearing and can interfere with everyone's ability to freely

express their own viewpoints.

At this time I will present Col. Rodgers, the Air Force team chief, who will present a briefing to help you better understand the Draft Environmental Impact Statement.

COL. RODGERS: Thank you, Col. Sweeney. As Col. Sweeney mentioned, I'm Ray Rodgers. My office is responsible for the planning, design and construction of the Space Division Facilities worldwide, including military family housing.

The Draft Environmental Impact Statement, which is the subject of this hearing, is also prepared under the supervision of my organization. First, I would like to introduce the other individuals here on the dais who is assisting us here this evening.

To my immediate left is Mr. Bob Mason, environmental planning division; and next to him is Lt. Col. Cole, chief of the design and construction division. To his left is Mr. Jack Doolittle, Environmental Science and Engineering; and to his left is Mr. Warren Pandorf, also from the Environmental Science and Engineering. Maj. Greiner on our Staff Space Division is on the far left.

I will now explain how the environmental analysis process is conducted. The proposed action, which is construction of 170 military housing units, units on White Point, the alternatives to the proposed action and the potential environmental consequences.

The National Environmental Policy Act requires federal agencies to analyze the potential environmental impacts of the proposed projects and to carefully consider

alternatives to the proposed action, including the no-action alternative. These analyses are used to make decisions and recommendations on whether and how to proceed with the action.

To implement the National Environmental Policy Act and the President's Council on Environmental Quality Regulations, the Air Force developed an environmental quality group. This decision-making process is based on the examination of the potential environmental consequences of the proposed action and its alternatives. The environmental impact analysis process is generally started by Air Force activities by sending in an environmental civil engineering group. The proponents do this in the early time stages of the proposed action to allow our office to determine as early as possible whether the project applies to the, which I will explain momentarily, requires an environmental assessment or an environmental impact statement.

The President's Council on Environmental Quality Regulations allow categorical exclusions for those classes of actions that do not individually or cumulatively have a significant affect on the environment for which, therefore, neither an assessment nor an impact statement is required.

Early in the analysis process, we determined that this military family housing project did not qualify for a categorical exclusion. The next step is to determine if the project needs it or needs the more extensive environmental impact statement. If it appears that the project will not have any significant impact, the environmental planners will elect to proceed with the environmental assessment. Every

environmental assessment must lead to a decision, to a finding of those significant impacts to assist us in preparing an environmental statement or to take no action on the proposal.

In 1983, when we began looking at various options for military family housing property, we concluded that an environmental assessment was appropriate. The environmental assessment for housing in San Pedro was published in July 1984. The assessment led to a finding of no significant impact in August of that year. However, when we subsequently requested the reversion of the 50 acres for the project, the city opposed the action and proposed alternative sites which we had not previously considered. The city indicated that our proposed building of housing at White Point does have significant environmental impact, thus, we decided to prepare an environmental statement, or EIS.

The first step in a preparation of an EIS is to publish a Notice of Intent in the Federal Register, to make this notice available to newspapers and other media and interested parties in the area. The notice for the single family housing project was published in the Federal Register on 15 November, 1985.

The next step in the environmental impact analysis process is to hold a public meeting, this meeting, to assure the complete list of the issues to be addressed and to help identify significant issues to be analyzed in depth which are related to the proposed action.

The purpose of this process is to emphasize

the significant issues and narrow the scope of the environmental statement and the identification of a range of facts and alternatives to be considered in the impact statement.

The public scoping meeting of the San Pedro housing project was announced in the local media and notices were sent to individuals and agencies which had shown an interest in the previous assessment. The meeting was held in San Pedro on 11 December, 1985. Based on input of information gathered in previously prepared environmental assessments, and from many other source documents, we began an extensive data gathering analysis, which culminated in the public hearing of the draft EIS. Over 300 copies of the Draft EIS were mailed on 3-19-86 to all individuals and organizations who requested a copy. In addition, we made copies available to local libraries for public reading. The Draft EIS was filed with the Environmental Protection Agency on 4 April, 1986 with an announcement concerning the availability appearing in the Federal Register on 11-8. The draft EIS notice to the Federal Register started a 45-day public comment period. The end of the period is 20 May, 1986.

During the public comment period two actions take place. The first is that the public hearing is held to receive comments on the draft document, which is why we are here this evening.

The second activity is that during the 45-day period, written comments may be submitted by interested individuals and agencies to the Air Force. All comments that are received during this meeting, either orally or written,

and during the 45-day period, will be addressed and answe in the final EIS.

Once the final document is prepared, copies will be made out in the same manner as the draft document The final EIS is filed with the Environmental Protection Agency. The EPA publishes a notice of filing in the Fede Register. Once the notice appears, a 30-day post filing waiting period starts. All measures that are proposed to minimize or mitigate the significant environmental impact must be identified in the final document. All mitigation measures that are approved by the decision makers will be implemented. On request, the status of the measurement associated with the action taken can be made available. Additions to the proposed action and alternatives will no be made earlier than 30 days that the public has been notified that the final EIS has been filed with the Envir mental Protection Agency. And once the decision has been made, it's duly reported and announced to the public. Th final EIS and record of decision on this project will be published late this summer. The record of decision will explain the conclusion reached, the rationale for the sele and the alternatives selected -- I'm sorry -- the alterna that were considered.

In order to draw up a list of reasonable alternatives, the proponents select standards. These standards should be in writing so they are available for public scrutiny.

In addition, any reasonable alternatives

suggested during the scoping process must be analyzed.

The standards developed on the project are published in the draft Environmental Impact Statement on page 1-4, and the standards are as follows: one, the site must be within 30 miles and one hour or less commuting distance from the Los Angeles Air Force Station. This drive time is estimated at peak travel time. Two, the site must be federally owned or the federal government must have a reversionary interest because the congressional appropriation for this project did not include funding for land purchase.

Three, the site usage must be compatible with the surrounding land use.

Four, the site size and configuration must be sufficient to allow economic development of the housing units.

Five, the site for the housing is to be in direct relationship to the surrounding land usage.

More than 40 regional alternative sites for the proposed action were initially identified and evaluated and narrowed to 15 sites. The evaluation of the alternative sites were supplemented by the results of other surveys and studies by the Department of Defense agency and recommendation from local elected officials and committees by the City of Los Angeles to study Air Force housing needs.

These evaluations and recommendations resulted in the identification of eight local alternative siting configurations to the proposed action for the 170 housing units, using various combinations of White Point, Bogdanovich and the upper reservation of Fort MacArthur, all located in

the San Pedro community.

I will now be talking about the size and alternatives, and you might find it useful to refer to the maps contained in the handouts provided to you.

White Point is a 145-acre parcel. The 145 acres was declared excess property by the army during the 1970s. Thirty acres were deeded to the County of Los Angele Department of Parks and Recreation in 1978. The remaining 115 acres north of Paseo Del Mar was conveyed to the City of Los Angeles Department of Parks and Recreation in 1978. The parcel deeded to the county and city was through the U.S. Department of Interior with the condition that the property be developed for recreational use. Included in the property transfer agreement is a clause that allows the federal government to reserve all or part of the property if needed for national defense.

Bogdanovich Park is a 22-acre City of Los Ange park located northeast of White Point. The land for the pa was conveyed to the city through the Department of Interior after it had been declared excess by the U.S. Navy. The si was used by the Navy until the late 1960s for housing milit personnel. The transfer of the property also contains the reversionary clause for national defense.

Portions of the park include the soccer and baseball fields. The City of Los Angeles suggested and offered this park as a split site along with a smaller port of White Point for the housing development.

The upper reservation consists of 111 acres,

of which 64 acres were conveyed to the City of Los Angeles Parks and Recreation Department through the Department of the Interior. The remaining 47 acres was conveyed to the Los Angeles Unified School District. The school district property agreement contains a 30-year waiver by the federal government of the reversionary clause. The property was intended for school use. The area currently is being used as a vocational training center, a school bus maintenance area, vocational and technical training center, automotive and body maintenance shops, as well as a dead records storage facility.

The 64 acres of the Parks and Recreation property includes the Osgood Farley site, the formal coastal battery and numerous World War II sites are being used by the Angels Gate Cultural Center, other groups, and the California Conservation Corps.

Due to the waiver of the reversionary clause on the school district property, the historical site of the property and a topographical appearance of the site, only 21 of the 111 acres of the upper reservation are available as an alternative site to the proposed action.

The action proposed in the Draft EIS is the construction of 170 housing units for officers assigned to Headquarters Space Division in the Los Angeles Air Force Station. The site for the proposal consists of 40 acres of land on the southeastern portion of the area known as White Point in the community of San Pedro, City of Los Angeles, California.

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The eight alternatives studied in this Draft Environmental Impact Statement are as follows: Alternative A; 50 acres of land located in the northwest portion of White Point. This was the original proposed action analyzed in the July 1984 environmental assessment. The proposed action was changed to the current one on the southeast part of White Point at the suggestion of the city. The reduction in size from 50 to 40 acres was made possible by elimination of five acres changed to recreational and athletic fields, and another five acres as the new site is flatter and, thus, has less unusable land.

Alternative B, 16 acres of land in the northwest corner of White Point and 22 acres on Bogdanovich Park.

Alternative C, 16 acres of land in the southwest corner of White Point and 22 acres on Bogdanovich Park.

Alternative D, 9 acres of land in the southwest corner of White Point and 22 acres on Bogdanovich Park.

Alternative E, 16 acres of land in the northwest corner of White Point and 21 acres on the upper reservation.

Alternative F, 16 acres of land in the southwest corner of White Point and 21 acres on the upper reservation.

Alternative G, 9 acres of land in the southwest corner of White Point and 21 acres on the upper reservation.

Alternative H, 22 acres of land in Bogdanovich Park and 21 acres on the upper reservation.

Additionally, there is a no-action alternative, which would mean no additional housing units would be built.

Next, I would like to briefly summarize the

potential environmental impacts of the proposed action and the alternatives and discuss the possible mitigation measures which might be implemented to reduce the impacts. The Air Force would take every prudent action necessary to reduce or mitigate the environmental impacts. The purpose of the summary will only address the areas of potential serious and significant impact for the various alternatives. More detailed discussions will be presented in the Draft Environmental Impact Statement.

The proposed action has a potential for significant adverse impact on land use for historical and archeological resources. Forty acres of this proposed action is indeed significant. However, if the remaining acreage on White Point were combined with the Royal Palms State Beach park, it would still remain a total of 124 acres, which could be developed into a park. Such a park would be larger in area than many of the other parks in Los Angeles, and also larger than 60 parks currently in existence in the California state parks system.

Further, the Air Force is pledged to work with responsible agencies in the planning of housing and parks to the maximum extent possible.

Concerning historical and archeological resources, the Air Force will coordinate various efforts with the California state Office of Historical Preservation Council on Historic Preservation to minimize an adverse impact on any of the historic and archeological sites.

Addressing the alternatives, potentially

significant adverse impacts to a variety of vegetation may occur if an alternative site is selected. This alternative will encompass the only known population of vegetation on White Point. The plant is the food source for the endangered Palos Verdes blue butterfly. It is also considered to be a relatively higher impact on the planned future use for White Point as a park than other alternatives.

Alternatives B, C, D and H are considered to have relatively higher impacts on the current land use at Bogdanovich Park compared with the other alternatives. The existing soccer and baseball fields at the park would be lost under these alternatives. Mitigation could include the relocation of these sports fields. However, neither an alternative location nor the necessary funds for the relocation of these recreational facilities has been identified.

This concludes the summary of the proposed action and alternatives and potential environmental impacts associated with the construction and operation of our military family housing in San Pedro. I will now turn the program back over to Col. Sweeney.

COL. SWEENEY: Thank you, Col. Rodgers. We are now going to turn to the question and answer period of this public hearing. Now, this time is set aside to allow you to ask questions about the content of the briefing and the draft statement. It is not intended to be a public comment or a statement period, which will come later in this hearing, but merely to provide more detailed information in response to

your questions. Thus, I am going to ask that you please limit your questions to the briefing or the Draft EIS. And please understand that I will have to interrupt you to ask you for your question if you proceed with a comment instead of a question at this time.

Once again, those of you who have already signed up to speak may wish to reserve your question until the end of your remarks so that this time may be used by those that will not be speaking this evening.

I mention that because we already have some 33 individuals who signed up and requested to speak this evening, and allocating our time restrictions to that it will take some four hours and five minutes to allow those individuals to be heard. So, we need to move right along.

If you desire to ask a question at this point, I would ask that you use the microphone at the podium to my right, and all you would need to do is proceed to the podium at this time to begin to ask a question.

The first question, please?

191 MR. BRIGHTON: You mentioned earlier that there were 40 sites that were considered. Why is White Point the only one that was left out of 40 possible choices?

COL. RODGERS: Well, if you read the Draft Environmental Impact Statement, we go through there and explain site by site why each one was not sufficient, either nonsufficient in terms of land area, distance from the station, or one of the other criteria which has been established.

MR. BRIGHTON: Well, an additional question: There

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are no other combination of those other sites that would be suitable?

COL. RODGERS: No, that's correct.

COL. SWEENEY: Sir, would you identify yourself for the purpose of the record so that we make sure we get your name?

MR. BRIGHTON: Joseph Brighton.

COL. SWEENEY: Thank you. Next question, please? Once again, give your name and affiliation or address before you ask the question.

MR. WHITEROCK: My name is Dennis Whiterock, a teacher at San Pedro High School, and we have been utilizing White Point Park as an educational resource for my classes for the last five years. I notice in the environmental impact analysis there is nothing there concerning the facility as an educational resource. This section on 3.6, .4 and 5, and 3.6 and 12 on recreational facilities 3.6118 on irreversible and irretrievable resources, but I couldn't find much of anything about the educational resource dealt with in the environmental analysis.

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COL. RODGERS: I will probably want to have one of our contract representatives, who did the research in the various areas, more fully answer your question, but I would just like to make a general comment, and that is, that if you have information, documentation on the use of the site which we have not included in the Draft EIS, if you can furnish that to us we would be happy to make sure that it is included in the final statement.

Jack, do you want to expand on that?

MR. DOOLITTLE: We did state in the EIS that the park or White Point was used for various walkovers and observation of the habitat. We did not identify it specifically, you know, as specific groups did, and if you have information on that we would be glad to designate it within the final EIS.

MR. WHITEROCK: Thank you.

THE SPEAKER: My name is -- (inaudible) -- I have a question regarding the Veterans Hospital in Brentwood. I have identified this as an ideal alternative, but it doesn't talk about the fact that there was a problem with the conditions under which the VA Hospital received this property. My question is whether or not you considered any kind of a permit agreement with the Veterans Hospital that would allow you to use that property without them losing it under the terms under which they received it?

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COL. RODGERS: In our contact with the Veterans Administration, the answers that we received was that none of the VA land is excess under the terms of the VA use of the property. And so part of the VA has said no, none of that is excess. But also, there is a problem with the granting of the deed, that if the VA finds that it no longer needs the property there is a provision in the deed, I'm told, that would revert back to the original heirs.

THE SPEAKER: That's why I was asking about a permit, so they didn't have to declare it as excess, didn't have to maybe say they no longer needed it, but could temporarily

for the next 30 years, temporarily allow the Air Force to use it with the idea that it then reverted back to the VA, because by then they may need that property.

COL. RODGERS: Well, the real primary reason is that they indicated to us that none of the property is excess. Whether some kind of legal document could be arranged, that I don't know. But that could be looked into.

COL. SWEENEY: Any further questions?

(No response.)

COL. SWEENEY: If not, we will proceed directly to those who have asked to speak this evening. Our first speaker will be Assemblyman Dave Elder from the California Assembly representing the City of Long Beach. Assemblyman Elder, are you here?

MR. ELDER: Thank you very much. For the record, I represent also San Pedro. I live in San Pedro, and I represent Harbor City and Wilmington, as well as a portion of the City of Long Beach. I appreciate your accommodating my schedule. I flew down to this hearing and I have to go back tonight. My comments are on the EIS, and I will try to stay on point with the comments. I want to indicate that I will have more extensive comment as I looked at the EIS Friday. Thank you for the opportunity to come out at this hearing. It's nice to know that the Air Force believes that the housing project proposed is worthy of environmental review in a day and age when many attorneys would argue that the federal government is not subject to the National Environmental Protection Act. At the same time, I think it unfortunate that

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the same attorneys can argue that the construction of a housing project must be completed in the name of national defense.

The Draft EIS appears to be too narrowly focused in at least seven areas. One, should not the final EIS incorporate a more detailed assessment of the possible presence and health and safety consequences of toxic or hazardous materials? The Draft EIS speaks, almost in passing, of possible presence of flammable hydrocarbon fuel and nitric acid oxidation and the suspected carcinogenic PCB.

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In response to the Draft EIS, it implies that while a toxic investigation will be undertaken, it will be limited at the outset to a search of available records and interviews with persons knowledgeable about this material handling during the army's use of the site.

While that may be a good start, it seems imperative that more onsite investigation, including water, soil, and possibly water sampling be undertaken. This recommendation is made for two reasons: First, all records and memories of army personnel, if they can be located after these many years, may not accurately reflect current and future hazardous material risks endangers both on and offsite.

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Second, the military services have less than a savory reputation for toxics management here in California; specifically, the EPA's national priorities list contains seven current and proposed military bases as candidates for hazardous waste cleanup. These include Castle Air Force Base in Merced, Mather Air Force Base in Sacramento, McClellan in

Sacramento, Norton Air Force Base in San Bernardino, Sacramento Army Depot in Sacramento and Moffitt Naval Air Station at Santa Clara.

In the interest of public health and safety, it is strongly urged that the EIS call for a complete remedial investigation feasibility study consistent with the EPA published guidelines. That should be completed before any other development is undertaken to avoid allegations that contaminated soil or structures were improperly or unsafely removed.

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Two, has the EIS adequately explained why this is a national defense project? It is understood that there is a property agreement that allows the federal government to revert all or part of the property, if needed, for national defense. However, it is unclear why the allegedly lack of adequate housing for field grade and senior officers has stifled officer recruitment to Southern California, nor is it clear how this housing project can be justified in the name of national defense.

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The EIS itself on page 3 through 6 says this is only a potential impact. More information should be included in the EIS on this subject. And I might indicate, parenthetically, that on Capitol Drive there is at least 500 condominiums under construction, some of which are going to block my view from the south side of Capital Drive.

Three, why can't officers buy housing in the open market? With all due respect to the transient nature of the military, little information is given to section 1.3,

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why officers must live in close proximity to each other. An explanation is needed why the EIS did not create open market civilian housing as a bona fide and formal project alternative. It says the EIS has not given actual total cost of the construction of the entire development for these people. Wouldn't it be cheaper to invest in a well-run officer relocation and rent mortgage subsidy program? Certainly, there is plenty of adequate housing for sale that would also help stimulate the local economy.

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Four, will more land be reverted later if the proposed alternative is allowed? What assurance is there that the balance of the land at White Point will not ultimately be sought by the Air Force for more government land? Will the land left be subject to an irrevocable deed restriction or will it be taken if needed for national defense?

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Five, why can't there be a housing density exception for the Air Force? The intent of the Air Force is to provide 170 units of housing. Why must the density of housing necessarily be comparable to the surrounding housing? How much acreage would be saved at White Point if the higher density were allowed? Couldn't 170 units of space-saving townhouses be built instead? Why couldn't the Air Force buy one or two or three of the ailing condominium projects in Southern California? With the power of the congress on its side, it's difficult to see how local zoning restrictions necessarily mandate single-family dwellings with larger yards being provided to military officers.

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Six, are we essentially polarizing the San Pedro

204 (Con't)

community? It is noted on pages 5 through 7 by the EIS that 60 percent of the recently completed residential housing units are military houses not available to the general public. As a result, it can be argued that the EIS has not adequately described the cumulative impacts of the militarization of the San Pedro community, especially with regard to the transient impacts on local schools and recreational access. And I might point out that we are seeing tonight the militarization of this room as a production presented by the U.S. taxpayer.

Seven, why doesn't the EIS state if the Air Force base is expandable? The need for new housing would be much lower if an expansion of the base were proposed, thus mandating additional personnel. There may be reasons for increasing housing allowances, but the reason for building new structures off the Air Force base itself is at best unclear. I am puzzled at some of the cost data that was developed in the EIS. What are the natural project costs? The military may be saving on land costs, but there is little convincing evidence that the per-dwelling cost, after site work is figured in, is going to be less than the cost of purchasing civilian housing on the open market or constructing high density living quarters on base property.

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COL. SWEENEY: Mr. Elder, will you begin summing up, please.

MR. ELDER: The comments I gave me this evening were preliminary because my office did not receive a copy of the EIS till late last week. It is my intent to provide more detailed written comments to the Air Force in advance of the

May 27th deadline. Again I thank you for this opportunity to comment on this matter of great importance to the community of San Pedro.

COL. SWEENEY: Thank you very much.

COL. RODGERS: I would like to make a couple of comments concerning Mr. Elder's remarks.

Concerning the hazardous waste cleanup, there is another completely separate program under which the Department of Defense is looking at their bases and identifying hazardous materials that have been -- that may have been disposed of onsite, or may be on the base, that were done prior to the days where environmental concerns were as evident as they are today.

This program is phased so it will begin with data search followed by actual site inspections and core borings to determine, you know, what might be there, and then followed by the actual cleanup of those materials.

You can rest assured that it will be done in the case of the land which was --

MR. ELDER: Has that procedure been approved by the EPA?

COL. RODGERS: (Nods head in the affirmative.) Concerning the national defense, the determination was made by the Secretary of Defense himself that this project qualifies under that clause. Now, I would think that he would know something about the subject matter.

MR. ELDER: He knows quite a bit about it. The President seems to know the most, though.

COL. RODGERS: One other thing regarding your comment on the open market, us going out and buying houses on the open market. The current amount of the money that we have gone out with for proposals for the housing is $12.3 million. Some quick arithmetic, that comes down to about $72,000 a house. And if someone has a block of housing that meets those criteria that's within an hour's drive of the station, the size requirements that meet our needs, I would surely like to take a look at them.

Does anybody else have anything?

MR. ELDER: On that point, 33.4 calls for an emergency clause to be put in next Wednesday, and it deals with the acquisition of the site in question. And what I'm concerned about is that perhaps we could attempt to make some fair market value for the differential between the $72,000 and what the fair market competitive housing might be. That would make the acquisition cost of White Point substantially less. I don't know whether in fact that bill would have much chance, but at least we can be in with an urgency clause without being subject to the normal deadlines legislation. So if the differential is 20,000, then quick arithmetic would suggest something on the order of a $3.4 million appropriation could provide the differential between market and 92,000, or whatever you think the market rate is, as it turns out to be.

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COL. SWEENEY: Thank you, Assemblyman Elder.

Our next speaker will be Mr. Robert McKinney, who is representing Assemblyman Gerald Felando of the 51st assembly district of California.

MR. MC KINNEY: Thank you, Col. Sweeney, gentleman. The assemblyman is back in Washington this past few days, and I appreciate the opportunity of coming down and preparing -- reading a prepared statement:

"This letter is to respectfully convey deep concern for the United States Air Force housing at White Point in San Pedro, California. As an elected representative to the California State Assembly since 1978, my district serves the San Pedro area, where I was born and raised. I believe I can speak with some degree of certainty on the issues important to this area, including whether the Air Force should be permitted to site any military housing at White Point.

"My staff and I reviewed the draft of the EIS dated April '86, and my comments are as follows: In my view, any development alternative which offers to sacrifice Bogdanovich Park is not consistent with the best interests of San Pedro. Not only is Bogdanovich Park a heavily used facility by the youth of our community, it is also a living memorial to Martin Bogdanovich and the great good he did for San Pedro. He founded Starkist Foods and he helped shape the early culture of the community.

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"Since the draft of the EIS alternatives B, C and H propose destroying Bogdanovich Park, I cannot support those. Alternatives E, F and G and H also threaten Angels Gate Cultural Center and the California Conservation Corps based there.

"I believe that as long as viable alternatives exist, those areas should not be encroached upon. That leaves

the preferred option 3.1-1 and alternative A to be considered.

"In either case, I am pleased that more than half of the acreage at White Point would remain open space after construction of the much needed Air Force housing.

"I would also like to address the economic impact to our community should the Air Force have to leave the South Bay and relocate in another area where land acquisition and housing are more affordable to the families of the men and women serving our interest. The Space Division spends approximately $6.6 billion annually in the Los Angeles County, including 1.3 billion locally, accounting for about 100,000 jobs. I would respectfully urge and support a compromise wherein we can maintain Bogdanovich Park in its present configuration and accommodate the needs of the Air Force on approximately 40 acres of White Point Park. Sincerely, Gerald Felando, Assembly 51st District."

Thank you very much, gentlemen.

3 COL. SWEENEY: Thank you, Mr. McKinney.

I would ask those of you that have already been seated if you would move toward the center and fill up any vacant seats so that other people may also be seated.

Our next speaker will be Christine (inaudible) representing Mayor Tom Bradley and the City of Los Angeles.

THE SPEAKER: I am here representing the mayor, Tom Bradley. I would like to also call up to the microphone Ann D'Amato representing Councilwoman Joan Flores' office. We will be issuing a joint statement as both Councilwoman Flores and Tom Bradley are out of the city today.

The city is currently preparing a detailed written response to the Air Force environmental impact statement which will be forwarded to the Space Division by May 27th. It is our opinion that the EIS prepared by the Air Force is inadequate. The city is disappointed that the Air Force's EIS gives very little consideration to alternative housing sites, as well as housing design and density. The Air Force could accommodate all of its housing on the alternative sites near White Point by utilizing a mixture of single-family and attached dwelling units. In fact, the Air Force has built attached units in the middle reservation of Fort MacArthur, which is under the direct control of the Air Force. And the Navy recently successfully negotiated with the city the transfer of property for construction of attached units.

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Significant use of White Point for housing of any nature would indeed eliminate any opportunity for a city or state park in this important site. The White Point Park site is the largest piece of undeveloped publically owned property in the city of Los Angeles; it should be preserved for present and future generations.

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MS. D'AMATO: Representing Councilwoman Flores' office. The proposed San Pedro specific plan and the city of Los Angeles designates White Point as a recreational area. The recommendation was reached with the assistance of a community advisory committee after community public hearings. The city's goal has been to accommodate additional Air Force housing in our community while presenting a multi-million

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dollar state park option at White Point. In its compromise proposals to the Air Force, the city has never presented a proposal which would not allow all the housing units the Air Force requested in the San Pedro community, nor have we ever suggested that the Air Force build fewer units in San Pedro and at other locations closer to El Segundo. We will continue to meet with the Air Force to discuss further the detail of our proposals, which would provide the Air Force with all the requested housing units.

We further request that the Air Force follow the direction of congress during its appropriation process. We urge the Air Force to work with the city to resolve this issue. We remain committed to preserving White Point, while offering other desirable and valuable city properties for future Air Force housing. Thank you.

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COL. SWEENEY: Thank you very much.

COL. RODGERS: I would like to make one comment, and that is, the latest proposal in a series of ongoing negotiations with the city of Los Angeles was made by the Secretary of the Air Force, undersecretary Jim Boatwright on the 17th of December of last year. We are still waiting for a reply from the city on that proposal.

COL. SWEENEY: Our next speaker will be Mr. Alan Holme representing the California State Parks system.

MR. HOLME: Gentlemen, Alan Holme. I represent the California State Parks system. The California Department of Parks and Recreation, Southern Regional Headquarters have had an opportunity to review the U.S. Air Force Environmental

Impact Statement. This evening I will give you a review. The department will supply a written response. Our basic concerns are as follows: One, the EIS addresses only local regional recreational needs and availability. It fails to acknowledge or address the significance of a combined White Point/Royal Palms properties meeting both state and national recognized outdoors deficiencies lies specifically within the Los Angeles coastal zone and have been more than amply identified by both state and federal responses to recreational studies.

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Two, the EIS, through the admission of pertinent and verbal written communication with the California State Parks system is providing the reader with a great distortion of the view of the capabilities of the state parks system. For example, there is no such thing as a regional state park. This statement is used several times throughout the document. We are not really in the business of providing recreational recreation. We do not provide baseball diamonds and basketball courts and that sort of thing. We are in the business of providing outdoor natural recreation.

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The department, as a general rule, and this is something that you are basically correct on, the department doesn't supply 24-hour protection. But to put it in proper context, the department, as a general rule, does not find it necessary to provide 24-hour protection for those parks. Thank God.

However, because of the many problems associated with White Point and with this particular project, we have

agreed to take whatever steps are necessary, up to and including 24-hour protection for White Point, should it become a state park.

Another thing, there are several statements in it that there are several state parks smaller than White Point. There are many types of state parks and many classifications of state parks, beginning with the state historians, state recreation, state beaches and, quote, unquote, state parks. We have historic units as small as one or two acres. The whole town of San Diego has four or five acres. So, but, state parks, and I use those words with quotation around them, by definition consist of relatively spacious areas. The smallest state park that I'm aware of is Fremont Peak at 250 acres. If White Point becomes a state park, it will become smaller than the largest, 600,000 acres, and with the average state park site being in excess of 6,000 acres.

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A further comment I would like to touch on. The EIS fails to acknowledge the city's offer of nine acres of White Point, where the statewide density proposal by the city is unacceptable.

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Four, the document neglects to provide the land use standard used in evaluation of alternative sites.

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Five, in addressing the Bogdanovich/White Point and ecological concerns, the document fails to acknowledge that ecological mitigation will be required regardless of which site is used. The cost will probably be identical. So I don't think the cost is a turning factor here. And I

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think the document really fails to acknowledge that the community, the city, the county of Los Angeles and the state of California in general, have voiced almost unanimous opposition to the use of White Point, and I think we really need to address the people's views on this matter. Thank you very much.

COL. SWEENEY: Thank you, Mr. Holme.

Our next speaker is Mr. John Galt representing the Native Plant Society.

MR. GALT: Yes. I'm the active president of the society. The idea of the society is to protect and promote the use of California plants. This idea is especially important for entering an age of water shortage and a need of water conservation in our dry southland. Governments and landscapists are taking this idea seriously and seeing the wisdom of using the native plants. The native plants here have evolved over thousands of years to a fine-tuned adaptation for survival in our semi-desert southland.

Some of you folks remember San Pedro when the hills were alive with new vegetation, beautiful flowers in the stream. White Point could be that way again with a state park. The state park at White Point would use drought-resistant flora.

My other concern is the protection of the state park we give to the pacific flyway, the migratory birds. In recent years I was a captain of a team which did the annual bird count of San Pedro as our share of the area in which we eyeballed and counted each species because of the lack of

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development on the hills and the shores on White Point. I was reading the other day -- because the place is alive with a wealth of birds. It's a thrill to have a pheasant explode from in front of your feet here in San Pedro. So all the other birds we enjoy. We have fly catchers, gnat catchers, three kinds of hawks and many kinds of shore birds in the proposed park area.

A White Point state park would help bird wildlife in two ways: Provide a fine year-round habitat for our local birds and, secondly, be an important rest station for the migratory birds on their spring and fall migrations. Thank you.

COL. SWEENEY: Thank you.

Our next speaker will be Ms. Marian Morgan from the League of Women Voters.

MS. MORGAN: My name is Marian Morgan and I represent the League of Women Voters.

Many of our members reside in this area, and we have long had a strong position in support of parks, particularly in urban areas. We also support the corporation/community groups in determining recreational needs of an area, so we now have an opportunity to have a state park at White Point in San Pedro. This would be the only coastal state park between the Ventura County border and the Orange County border.

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We have had several community meetings. Overwhelming support has been presented by the San Pedro Peninsula homeowners, the historical society, Rancho Palos

Verdes city council, Izaak Walton League, the Sierra Club and other groups as well. These positions have been reached after concentrated study and consensus.

In support of the proposal, state senator Robert Beverly introduced legislation, senate bill No. 9 in 1983, which requested a feasibility study done by the State Department of Parks and Recreation. The resulting plan was published in 1984. In the determination of the California Coastal Commission, the proposed Air Force housing project is inconsistent with the Coastal Act. If the land available is transferred to the Air Force for the construction of housing, a state park is considered not feasible, which would adversely affect the opportunity for enjoyment of this rare coastal resource by millions of people in this area. We strongly support a state park at White Point. Thank you.

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COL. SWEENEY: Thank you, Ms. Morgan.

Our next speaker will be Mr. Paul Nevins representing the San Pedro Peninsula Chamber of Commerce.

MR. NEVINS: Thank you, Col. Sweeney. I am Paul Nevins, president of the San Pedro Peninsula Chamber of Commerce. I'm speaking this evening on behalf of the San Pedro Peninsula Chamber of Commerce.

We represent nearly 600 businesses in this community, businesses which have a stake in the future of San Pedro. A few years ago, in order to study this issue the Chamber established a White Point task force to review the controversy surrounding the proposed officer housing at

White Point for the Air Force Space Division. I think that the White Point task force did a very thorough job in reviewing and examining the pros and cons related to the proposed Air Force housing and the pros and cons related to the proposed state park development.

It was our conclusion then, and it remains so now, that there is more than enough land to provide for both the housing and for reacreational uses. The problem which we feel needs to be resolved is how do we arrange the housing so as not to preclude recreational use.

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It is our contention that the only way to resolve this question is for all parties to meet and work together to find an acceptable compromise. We have reviewed the Draft Environmental Impact Statement. This was obviously an extensive undertaking, and we commend the Air Force on the thoroughness of the report. Of particular interest to us were the various alternatives that were enumerated. We believe that these alternatives represent the comprehensive list of possible compromise positions. The EIS includes a review of the Air Force's objections to some of these alternatives and the criteria they are using to select the location for their housing.

In our view, the real value of the Draft EIS is that it provides a possible basis for discussion between the city and the Air Force. While there are positive and negative aspects to each and every alternative, we are confident that a mutually acceptable compromise can be reached to provide for housing and recreational use,

providing the parties are willing to negotiate and bargain in good faith.

We now have the options enumerated in black and white, and each option should now be easier to evaluate. We have been in contact with both the Air Force and the city. Both sides have expressed a willingness to meet. We are hopeful that a positive dialogue will result in a compromise, which can provide that needed housing for the Air Force and also safeguard the recreational options for the city.

After two years of this controversay, it's time to get White Point resolved, get it behind us and move on to other issues which are important to San Pedro. Thank you.

COL. SWEENEY: Thank you, Mr. Nevins.

Before our next speaker, I would note that a number of people still haven't been able to find seating. There are a number of seats in the front rows, if you choose to come forward and take those.

Our next speaker will be Mr. James Hirt representing the El Segundo Chamber of Commerce.

MR. HIRT: Colonel, ladies and gentlemen, my name is Jim Hirt and I'm the president of the El Segundo Chamber of Commerce. I'm also director of public affairs at Hughes Aircraft Company, and I guess I'm here this evening also to preserve a salary source for our area which is located in the city of El Segundo. And I note that aerospace and defense and electronic firms account for more than 100,000 jobs in the South Bay area. And that doesn't begin to cover the

thousands more folks who are employed through suppliers and subcontractors. The economic impact of this industry in the South Bay area in 1985 was $6.6 billion. And I raise these points only to emphasize the value of the Space Division to the area's economic well-being. If you would look over the division, it includes the research and development, the launch, management of an orbital operation and space systems representing a significant element in the aerospace structure. It keeps this area on the cutting edge of technology. So we are not just talking about -- we are talking about the economic future of this area for years to come, and a lot of communities across this nation would be pleased to have this in their area.

Now, like the Air Force, the industry has critical housing problems, too, limited affordable housing and housing costs that are among the highest in the nation in this area. But unlike the private sector, the Air Force has some unique problems that we don't. This station, the Air Force station in El Segundo, is not a base with its normal allocation base housing, and this makes it extremely difficult for Junior officers and noncommissioned officers to deal with. And I'm sure all you folks here this evening who were in the service, I'm sure a lot of you have sons and daughters that were in the service, and you know what it can be like if you try to have your family with you and you can't afford to have them be near you. The Air Force people here do not have flexibility. The Air Force doesn't adjust pay scales or housing allotments the way the industry

does. They are also faced with a short duration time table to a duty station and it economically knocks them out of the ballpark when it comes to purchasing a home in this area. The study has clearly indicated a desperate need for additional Air Force housing. We fully agree with that assessment and we support that conclusion.

I have here a letter from the mayor of El Segundo. I wanted to read the whole letter, but I will go through one paragraph: Shortage of affordable housing has long posed hardship on Air Force personnel assigned to the Space Division. Lack of suitable military housing has scattered the Space Division's 2,000 military personnel throughout 90 communities in three counties, and it forces them to commute up to two hours a day -- and I was talking to a young lieutenant earlier today who named some folks that worked with her who commuted up to three hours each way to work. So we have a lot of fine young people in the Space Division, and they have been motivated to dedicate several, and in some cases many, years of their lives to the national defense. They have made a personal commitment to the nation, and it seems to me that the least we can do is return the favor. We support the Air Force housing development project at White Point.

COL. SWEENEY: Thank you.

The next speaker is Mr. Richard Hubizak representing the Palos Verdes Audubon Society.

222 MR. HUBIZAK: The gentlemen who asked the question concerning a loss of student educational opportunities was

rightly concerned. I felt that the Draft did not address that also. And in the scoping meeting -- I will quote you my statement then: The first item that we'd like to see addressed on your environmental impact study is a figure that the housing project would have on the students of the surrounding area as a result of a loss of this educational opportunity. So it was brought up at the scoping session.

I would like to state that the Audubon Society fully supports the preservation of White Point as open space and is totally opposed to housing of any kind on the property. We feel that the only way to protect this resource is through the preservation of a state park, and we have supported that goal for several years. We find it unreasonable on the part of the Air Force, with all the options available, that they persist in this effort to destroy valuable coastal property. It is hard to believe a carefully planned higher density would not satisfy the needs of Air Force personnel.

The Draft Environmental Impact Statement that we are addressing tonight is tailored to support the Air Force's position. Important items are missing. One of these items is the cost of the project. There are no estimates for the proposed action or any of the alternatives. One site, the upper reservation, is ruled out for housing because the high cost of demolition of its army barracks. What high cost? What is the relationship between the cost of demolition and the cost of removing and disposing of the hazardous material? What is the relationship between hazardous materials on the upper reservation and hazardous materials

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at White Point?

At White Point you have graciously offered to clean up and control toxics or hazardous materials regardless of whether or not the site is selected for Air Force housing, using the Department of Defense restoration program. Could this program be used at the Upper Reservation?

Another item missing from the draft is the impact on the wildlife at White Point. At this point I would like to thank John Galt for representing the birds so adequately on his statement. When the July 1984 Draft Environmental Impact statement -- that's the first one that you prepared -- came out, we questioned a one-day walkthrough survey as not being adequate. For the current draft, we requested a comprehensive study of flora and fauna and we were given a three-day walkthrough, plus some traffic. We still have to question whether that is adequate. In the time between the two reports, the Air Force could have prepared a useful survey of the area taking into account the time of year. In any case, the present draft leaves out the following conclusions found in the 1984 draft. Now I'll quote from that. This is concerning White Point. Although the habitat on this site is highly disturbed, there are any different population of a number of small animal species and some birds. The development of housing on the site would force displacement of resident individual species. As the displacement occurs, there is also a probability that the resident animals, with the possible exception of birds, will be able to migrate and successfully establish themselves

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225 (Con't)

in their remaining habitat north to the site. There is a number of small animals and reptiles and a problem of all displaced animals of competing with an established pond in adjacent areas. The development would destroy an important food resource, seed for both suburban birds in the adjacent development areas and migratory species that temporarily use the area, while a typical suburban bird would reoccupy the development. The various capacities for seeding for the various birds would be decreased. Perhaps most importantly the elimination of large rabbit and rodent populations on the site would seriously deteriorate, an important food source for migratorial birds and hawks and owls on the Palos Verdes Peninsula.

This particular report used in the 1984 draft was written in 1975. Think about the impact since then due to more development on the peninsula and in the surrounding areas.

Although endangered species were found on White Point, we are well aware that our local natural resources are rapidly disappearing around us. The question that we all must ask is do we keep developing or do we fight and keep what we have. Thank you.

COL. SWEENEY: Thank you very much.

The next speaker will be Mr. Paul Meister representing the Los Angeles Oceanic Society and the Greater Los Angeles Council of Divers.

MR. MEISTER: Okay, the Greater Los Angeles Council of Divers begun their effort on behalf of White Point in 1971,

and the Los Angeles Chapter of the Oceanic Society began their effort toward the park in 1978. So obviously they are in favor of the park, and they will submit written reports before the May 27th deadline. So I'll just spend my time to address a couple of problem points and then give way.

In this Environmental Impact Report, it mentioned that housing in L.A. is a problem for Air Force officers. It mentions they have to travel more than an hour to work. I might mention that that's the same for me, I have to travel more than an hour to work.

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3-17 mentions about the landlord raising the rent every year. He raises mine, too. Cost of homes in the L.A. area forces the purchase of homes out of the L.A. area. There is two people where I work that have just closed escrow in Palmdale. That's quite a ways away.

The point I'm trying to make is that the problem is not that unique to Air Force officers; it's for Navy officers and Marine Corps officers and Army officers and people that are just employed in the business of national defense here in California that are civilians. And the problem is not going to improve. The building of homes for 170 select Air Force officers is not going to solve the problem for Air Force officers, and I don't believe it's going to solve the problem for naval officers or any of the other people, and certainly not for civilians employed in the national defense, or for that matter employed, period.

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However, it may, or will, I think, create more serious problems. In order to acquire the land you have to

activate a reversionary clause, which means that you basically take the land in the interest of national defense. Now, most of us think of this reversionary clause, as defined, national defense is a pretty serious business. And most of us recognize -- well, I sort of skipped a lot of this. Let me jump around here.

Anyway, I'll catch up to myself. In the interest of national defense, we usually think in terms of digging foxholes, not building single-family homes. And I don't think anyone ever expected that the national defense will be used for a housing project. If we begin to use national defense to solve our every-day living problems, then I believe we open the door for serious injustices.

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The reversion clause, if activated at White Point by the Air Force to build 170 homes, may then become a reversion clause that the Navy activates to build additional homes. It means that every piece of land with a reversion clause that seems desirable for a home site could conceivably be activated in the interests of national defense. So it doesn't stop with 170 homes at White Point; it begins with 170 homes at White Point and it ends with all the land going to homes.

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Anyway, I'm sort of interested with a little story. I don't know, the gentleman mentioned the Secretary of Defense knows a lot about national defense. And that's true. I don't think he knows much about White Point. In 1905 there was a Japanese fishery developed at the bottom of the hill at White Point. A lot of Japanese immigrants

came into the area and a resort hotel -- the fishery gave away to a resort hotel at Mineral Springs at the base of the hill and began to develop towards resort activity. Actually, in the twenties there was a golf course and so forth. Now, the tendency toward resort was stopped or augmented, or whatever. But this was a couple of things. First of all, the earthquake. The earthquake shut off all the sulphur springs or shifted the sulphur spring activity at the base of the hill, and it is still in the subtidal area. There was the depression, I imagine, hindered the development of the area for recreational purposes. But I think the thing that most hindered the area was World War II when the area was acquired in the interest of national defense. And as we know, the Japanese were around then and they were interned in a prison in the interest of the national defense. And when we look at White Point, it's a symbol of national defense. We see the deteriorating gun placements. We read the report about toxic waste dumped in the area. If you go down to White Point you will see the rubble and ruin of a once beautiful hotel.

Now, it's going to be a very interesting thing, I think. Maybe the ghosts of White Point are laughing a little if we begin to fight the battle of what you can do to people in the interest of national defense on the battle-ground of White Point. Thank you.

COL. SWEENEY: Thank you, Mr. Meister.

Next, we'll hear from Mr. Ken Malloy representing the Izaak Walton League.

MR. MALLOY: I am not only crippled in one leg but my eyes aren't too good, so I hope you will bear with me.

I'm Ken Malloy, special project director with the California Division of the Izaak Walton League of America. About seven years ago the Izaak Walton League recognized the value of White Point as a state park. The league has been involved with the many national and local issues that concern the preservation of open space for public enjoyment and recreation. Sixteen organizations have joined in support of the state park at White Point. They are in alphabetical order, the American Association of University Women, Angels Gate Promotional Center, the Audubon Society of Palos Verdes, Friends of the Animals, Greater Los Angeles Council of Divers, Harbor Human Relations Council, League of Women, California Native Plant Society, Oceanic Society of Los Angeles, Rancho Palos Verdes City Council, San Pedro and Peninsula Homeowners Coalition, San Pedro Historical Society, San Pedro Garden Club, and last but not least, the Sierra Club. All have accumulated their reasons in support of the park previously. Several are here tonight. Some of the organizations work to -- hope to adopt programs for youth groups, and all of the organizations expect to have an opportunity to have input to the plan that is about to be finalized for a park. I might say, too, that legislation for support of the park, Congressman Joan Flores, Mayor Tom Bradley of the City of Los Angeles, Assemblyman Dave Elder and State Senator Robert Beverly of the State of California, Congressman Glenn Anderson and Senator Alan Cranston from the Federal Government,

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the Coastal Commission, several of whose members are ex-military personnel, voted unanimously against the housing project, finding it inconsistent with federal and state coastal statutes and saying that the use of the land for coastal dependent recreation was desirable. Thank you, gentlemen.

COL. SWEENEY: Thank you very much.

Our next speaker is Mr. Tony Portillo representing the "All My Relations Tribe."

MR. PORTILLO: My name is Tony Portillo and I'm speaking on behalf of the native way here in the area, and I would like to say that we oppose the building of White Point, for our way is a way. We all have relations which have knowledge. All things is knowledge. Knowledge is all living things that are not just the two-legged things for the greater people to enjoy our mother earth, the water, the medicine. We oppose the building in this area because we would have to displace all our relations that are living on this area at this time. And by displacing them you would not be in harmony with all things, which we have gotten away from. And I think we have to take a serious look at all our relations, not just the two-legged and these little wars we have going around the world in vested interests that all people are guilty of, and we have all been guilty of being greedy and fighting our brothers and sisters, but also acknowledging all of the relations, acknowledging the sky, the water, the earth, the grass, the rodents, the weeds. They are all life. If we don't pay attention and wake up and take care of business I think

what we are going to do is start over again. Thank you.

COL. SWEENEY: Thank you.

Our next speaker is Ms. Idelia Chestnut representing the Harbor Human Relations Council.

MS. CHESTNUT: My name is Idelia Chestnut from Harbor Human Relations Council, and I'm right now in the process of writing the history of what we have done for 20 years. And for 20 years we have begged, pled for a park for the people of the United States, for the people of California and for the people of Los Angeles. We are absolutely opposed to housing on the White Point reservation. We were extremely happy to get it back from the Army; now we don't want to give it to the Air Force.

COL. SWEENEY: Thank you very much.

Our next speaker will be Mr. Jacob Gutierrez and the Concerned Citizens of San Pedro.

MR. GUTIERREZ: Hello. This looks like Watergate. This is a very difficult moment for me because I feel like everyone in this room is my friend and enemy simultaneously. And as I talk about these things, bear with me, and I hope you will listen.

I personally campaigned against the Air Force a number of years back singlehandedly, lived in a tent for three months, picketed, collected 5,000 signatures against the Air Force housing in San Pedro. Nobody in San Pedro worked harder than me to keep the Air Force out. And I defy anybody to go against me in saying that.

I also saved the national monument of Wilmington.

I spent another three months out there with family members for Angels Gate, a number of other things. I would like to think that I have been here for a long time. If you look at my heritage, I have been here over 10,000 generations. I was born and raised in San Pedro. My mother, my father, my great-grandmother, who was 102 and sat right here, is from San Pedro. Okay. About a month ago, or a couple months ago, we had -- I had a problem with a little cemetery and it was filled with graffiti. It's a local problem we have been having for the last five or ten years. It looked like a Tijuana toilet. And it's the First Church of San Pedro. It's where the founding members of San Pedro are buried. I couldn't get anybody to paint out the graffiti. I couldn't get anybody. And what happened, I guess it's a chain of events. I called it a miracle. But the only people, the only people in this town was the Air Force. They came out and painted that church. They had a hundred people there. We scraped, they brought a portable kitchen, we had hot dogs. I had a colonel, Bill Sawyer, up painting. I had a general with a paint brush. It's tough. It's tough -- it's tough, you know, to say this, eating your words, or whatever. I tried to get the Audubon Society out here. I warned them of White Point years ago. I have been on all of the committees and I have worked all of the different things. I run around San Pedro and try -- at least I go around two or three times a day. I love San Pedro. My heart is here and I want to give some perspective to the situation. It's a tough thing. And I know that there is a number of anti-war people here.

I am a peace activitist. But I don't look at Star Wars; I look at Star Trek. And I look at the future of the United States of America as the Air Force. I think the Air Force is the future. It is the only way that we are going to be able to go.

What happened to me when I was protesting, there was one thing that happened to me. There was a bus -- there was a bus driver. He stopped by while I was protesting. I was out there by myself, basically, with the signs rain or shine, and a bus driver told me this little thing. He said, "You know what, I want the people that defend my country to have a place to live where they can do some clear thinking." And that stuck with me. That stuck with me a long time. And I held myself back for a long time. I didn't say very much. But I'm coming out and I'm saying that the Air Force housing is important to the country. I think it's important to the state and to our community. I would like, personally, to see a compromise. I would like to see a state park and I'd like the people of San Pedro to consider what really -- what is really going on here.

These people, if you look at the housing itself, they have areas their kids play in. They have space between the houses, they got trees, they have landscaping, they are clean, orderly. They take care of their kids. I made a list of the things that bothered me about the Air Force housing a number of years ago, and one of them was the crime, what was going to happen to the crime level in San Pedro because of the kids. Well, Bill Sawyer did a really marvelous thing;

he created a house for these kids. He said that they created so many rules for themselves that he couldn't even live with them. What has San Pedro done for our kids? I mean, when I was three months over at Cabrillo Beach trying to develop something over there, the kids were burning the pagodas. They burned them up. What have we been doing for our own hometown?

Now, we have some doers in this town. I was in the Marine Corps. I was also an honorary colonel in the Air Force through the Illustrators Society. But I think what I'd like to say here is that these people are concerned. The Air Force, they are doers. Action speaks loudest. I'd like to -- as one of the oldest citizens of San Pedro, I would like to welcome the Air Force officially -- I'm eating my words here -- officially to San Pedro, and I hope they can get what they want. But I also hope that San Pedro can get what they want, too, in the state park. Thank you very much.

COL. SWEENEY: Thank you, Mr. Gutierrez.

Our next speaker is Mr. Dennis Woodock. He's a marine science teacher.

MR. WOODOCK: I have been a public school teacher in high schools in Los Angeles for 24 years. I taught in the inner-city for eight years. I taught at San Pedro High School for 13 years. I think I, too, have a perspective of what the people need here in this town. Young people, especially, have utilized this area for recreational purposes for a number of years. My students recognize the tidal area offshore area.

About four years ago San Pedro High School started a marine science magnet school for high school students. Those of you who are not familiar with magnet schools, they are to draw students from all over the city of Los Angeles at the high school level to study science. And we have approximately 200 students from all over L.A., as far away as the San Fernando Valley and Sylmar, Eagle Rock and Sherman Oaks and points in between, to come down here every day to study science.

232 We have used the White Point tidal area as our onshore laboratory. We have unlimited use of transportation of buses to make regular visits to this area and to utilize it as part of our curriculum on a regular basis.

My environmental study class, as part of that magnet, also used White Point Park property to study the plant and animals. We made routine regular observations of the native animals. 233

I look at other places in this town, and I see a place like the museum utilizing that facility for educational purposes. They probably introduce young people all over the district to -- probably over a hundred thousand young people to the inner tidal area, and I see the need for these kinds of things.

I think, personally, you know, I have been all over this country. I have studied biology. But some of the things I value the most are the things I have seen right here around Los Angeles close to home. For example, I have seen up in the San Gabriel mountains, you can see them out of

windows on a clear day, I have seen big horn sheep on one side and turned 180 degrees with my binoculars and looked over where 20 million people live. To me that's something real worthwhile, to live in a place like that. I think one of the other things I rank highly is being a quarter mile off White Point in a canoe and seeing a whale up close enough so that I can touch it with a paddle. And I think the third thing I rate highly is something that happened at White Point Park a few years ago approximately, a bizarre thing, the Department of Parks and Recreation decided in the interest of fire control to bulldoze a steep hillside and tear down all the weeds and about eight inches of top soil. That day I went out there with a friend, and inside of 30 minutes I saw some things that I had never seen before. I seen a couple of birds that I had never seen before, a great blue heron, which I had never seen there since. I saw a pair of white kites swooping over each other. I saw a hawk swing down, a Cooper's hawk swing down and get a rabbit. All of this was in one view, and it was like a message or something that this is someplace that is really special that needs to be kept that way.

I think I would really like to try to teach my students the value of maintaining open space in a place that is close to where people can see it and experience it on a regular basis, and that's why I would like to see this area maintained as an open space, and I would like to see the state park system as a stewardship that keeps the campgrounds. Thank you.

COL SWEENEY: Thank you very much.

Our next speaker is Col. William Sawyer, the base commander of the Los Angeles Air Force Station.

COL. SAWYER: I am Col. Bill Sawyer, the base commander of the Los Angeles Air Force Station. Prior to coming out here, I was the assistant director of personnel for Systems Command. In that job, my toughest task was to get people to come to Los Angeles. The reason was housing. They just simply couldn't come out and afford it. As a result they didn't come. We lost a lot of very valuable engineers, not only to the United States Air Force but to this nation, engineers that could help us with the future.

We do not need to do that again. We need housing and we need it badly. However, as a person who grew up as a kid on an Indian reservation in Oklahoma, I also know the requirements and needs of the outdoors. I personally feel we can join together. The Air Force would like to tell you that we are good people, we like to get out and be part of your community.

The Air Force is an occupation. You will find that where we live is where we belong. In this case, when these blue uniforms in this room go home, they become San Pedrans. They are interested in the environment of this community. We are interested in our children having a good education; we are interested in our children understanding nature and being in a place where we can see the whales, the wildlife, and we happen to think that maybe we can inter-mingle the two.

We do a lot for our community. Not only do we do it working hand in hand with people like Joseph as good neighbors, but we do things in supporting the community affairs. We put $147,000 into campaign funds. We have people that work for Meals on Wheels. We send our people to the high schools and elementary schools to describe what we do in the event of an earthquake if it came up. We get out and work in the community because we want a good place to live and a desirable place to live.

I would like to think that we can become the best of your citizens and help you make this a better place to live. But I also know that I have got to be able to retain a natural resource that is fading away, and that is of the technical knowledge of the United States. We need to have it so that we can progress so we can get rid of the actions that we have recently gone through so that we can do a better job. That comes in the form of experienced officers.

Right now, unlike industry, I cannot adjust pay, I cannot adjust housing allowances as industry can to get a field grade officer out here. I have to almost drive them out here. Most of them wish to leave their families someplace else. It creates family problems and less effective officers. It affects not only our defense but it affects you and I. I think that's where the term national defense comes in. We need these people and we need them in the Air Force. They aren't like a weapon. They all use their lives, they use their minds, not only for the military but for peaceful things as well. They use their minds to go to church, they use their

minds to work in schools, like some of our lieutenants do, to help tutor people. They use their minds in working for PTAs, they use their minds in walking through the neighborhoods. Nobody better than I, who grew up on a reservation, can appreciate big horn sheep, a bird, a flower, for I too was raised in the wild. But, however, I also appreciate what we need for the future. I need field grade officers. I need them to be effective so that they can manage and train the future of the nation, which is our young officers and our younger people.

The way to get them is, I have to provide them a healthy place to live. As I said earlier, I can't adjust their pay. I can build them homes. What other compromise we use, let me ask you and say to you, we want to be a part of your community. We would like to be at White Point. We think we can come up there and build a state park beside us and have the best benefit of both worlds by becoming your neighbors and helpers, and all of us can be better off in the future. Thank you very much.

COL. SWEENEY: Thank you very much, Col. Sawyer.

Next we'll hear from Mr. Jerry Gaines from the South Shores Homeowners Association.

MR. GAINES: My name is Jerry Gaines. I'm presently serving as president of the South Shores Homeowners Association, which represents 1100 homes located just west of White Point Park.

We have been working hard on this issue for two years or more. We have been trying to see if a carefully

planned acreage would be part of the compromise. We agree with Paul Nevins and the Chamber of Commerce that that needs to be worked on continuously and diligently.

Our constituency has never been antimilitary as far as the value of military personnel in this community. It's a land use issue and we are focusing our attention strictly on the impact statement and focusing our attention on the Air Force housing plan for officers as far as listening to your views and so forth.

We have reviewed this document at length, and we definitely believe we find some deficiencies or flaws in it. That's our focus of attention. We find about six particular flaws that really concern us. First, the level of impact for the proposed action of 170 housing units on 40 acres of land at White Point on the development or potential of the state park; second point, the apparent judgment in the development of the merits of the state park in the White Point area;

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Third, we are concerned about statements in the draft that lessen the degree of the activities that we would think would exist on the part of the Air Force in reviewing possible alternatives to a compromise solution;

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Fourth, we are concerned about apparent incorrect data on housing density presented in alternative plan D, which is prepared by the City Planning Department and Architecture group for the development of recreation parks;

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Fifth, we are concerned about admissions of statements that were made by us publicly in writing in

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238 (Con't)

December about what we defined as housing compatibility in our neighborhood;

And finally, we are concerned about the limited scope of field contacts as documented in the back of the report, as far as contacting the media, citizens who live in this community that I represent;

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Sixth, at the December hearing 37 people spoke for that issue, yet there is very little acknowledgment throughout the document of just how seriously concerned different groups that you have heard from have been about that particular potential use of that land area.

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Secondly, the fact that there is 147 acres that are still remaining that is actually developed, and therefore local government could still develop this areas as they wish. What is not recognized is that local government agencies have been unable to finance the park in this area because of the problems and the like. This is all history. As you well know, the California park agency is the only one we are aware of that confines their resources to do a developmental plan. But they have said, they said in hearings and other meetings that we have been a part of, that they need a sufficient amount of acreage for a buffer between homeowners. Thirty-four percent of land in White Point would in fact disqualify that park as a state park. It's published. Two years of hearings on that park proposal have shown strong support from various members of the community. We have also been concerned, and you documented this well, about overnight camping. But we have also heard, as you told us earlier,

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about a 24-hour security option for this park. You also list other comments in the draft about current run-down conditions at both the Bogdanovich and White Point area. This is some of the various reasons we are very concerned about the language, what we point out as a public nuisance at Royal Palms Beach.

The second thing that concerns us is the tendency to pass judgment on the option of the state park at White Point. The comments throughout the draft passing judgment have just really sometimes shocked us. They referred to appearance of the park, user vehicles, as opposed to looking at houses. They referred to the security that might be provided if this option were developed.

242 You provide crime statistics for both the police departments of Los Angeles and statistics from the Royal Palms or from the state parks and other areas. We can only ascertain, perhaps, that there is some second guessing as to where the residents are concerned about the security of the area. The fact is, that we know of the conditions that are there. We live there and have been there for 20 years. In fact, if you look at the document, you will find out from yesterday's papers about a gang war that took place there this Sunday night. We just can't understand that this objective study of the potential development of housing in the White Point area, why you would editorialize about other land use options which really are not. You should be focusing on housing, not on the state park. This is what concerns us.

243 The third concern is of the activity. Eight

243 (Con't)

options were presented. You disqualified five of them right at the beginning. It seems kind of confusing that we are talking about negotiation. I think you should look at all of them with some degree of objectivity. The congress passed on funding for this housing project. They stated, quote, if the Air Force is unable to resolve the issue regarding the site, they should work with tne city to plan alternative sites.

Congress appears to suggest that we wanted to negotiate in good faith and in the very act it provides funding for the housing.

The fourth point where the data is apparently incorrect, housing density that would be used for alternative plan D, which was made December 17th or back in November, I guess it was. But if you would check with me on the tables and statements on plan D, you quote in your draft that there be 90 housing units at White Point and 80 units at Bogdanovich, according to the plans which were presented to me. That's not the case. It says 60 units at White Point and it says 110 at Bogdanovich. And all of that is based on what the other property is associated around that property. We are confused why the data is not what we have in this plan D presented in your draft. We would certainly like to have someone check that one out.

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The fifth option is the omission of statements that we have had about housing compatibility. We have been very clear on this, that we were very opposed to anything but single residential. Now, we are talking about eight,

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the eighth alternative. And these eight involve possible siting of housing next to four-story retirement homes, Vons Supermarket, Alpha Beta. There are variables here that make a compatibility factor a little different than what you originally proposed a few years ago. We have 2400 square foot townhousing units worth $250,000, and we are very proud of them. So it's very much feasible, we believe, to have some discussion and negotiations on housing density. And finally, we are concerned about the limited scope. We look, at last, to the back of the document, and we see federal, state, county, city and research-type folks, official-type folks. We only see five other folks listed, and four of those five are public utility-type folks. We only see one citizen contacted, that doesn't live in the immediate neighborhood. So, at the conclusion, we are wondering who have you talked with, because we haven't been visited in the field too much about some of our feelings about potential comprise and other concerns that we have.

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We really ask that you consider us fairly in recognition of what people think about park development. Avoid editorializing on the potential land uses, apparently incorrect data on the housing density and make a little effort to contact us. We think if these things were addressed and approved, the subject would be considered a more valid one. So we certainly hope that you would consider addressing these flaws, hopefully before you enter discussions with the city and state officials. Because believe me, we would like to settle it. We love the Air Force. It has nothing to do

with the community of people. It has to do with land use compatibility. We really want to see this thing resolved.

COL. RODGERS: I would like to respond to the matter of contacting individuals. That's the very reason we are here tonight, to see the individuals from the committee.

On the comment of density of the housing, I think everyone can appreciate that the numbers that have been put on the preliminary plans, 80 units on one site and 90 on another one versus 60 on one versus 110 on another, these are very preliminary planning figures, so that the densities are not of course locked in concrete. As we get firm proposals back from the architect and evaluate those, then we will be able to tie the densities down more specifically.

MR. DOOLITTLE: I would like to add, in terms of contact with local individuals, that we did include a table in the draft statement that there were a total of 37 speakers at the scoping meeting, plus, we received an additional 71 written statements. Those people were not included in the contact. They were included in who received a copy of the Draft EIS, and there was quite a bit of contact with local people.

COL. SWEENEY: Thank you, Mr. Doolittle.

Our next speaker will be Mrs. Martha Engbine.

MS. ENGBINE: My name is Martha Engbine. I am not representing any group, just representing myself.

First of all, my husband was in the Navy Air Corps, and believe me, I sympathize with you. I know what

it is to find housing. But, you know, we only have one 500-acre site where we can have a state park and have overnight camping for families. And this would take in all of Los Angeles. I mean, the whole United States would be able to use this park and enjoy it. And there are so many people that really want to see a park in this city. I can't believe

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that the Air Force cannot find some alternative land to build their housing on. And I hope they can, because I think this would be perfect for a state park. We have three freeways coming approximately to it; we have state rangers there. We would not have problems with vandalism or the things that have taken place in the park. Because we have overnight camping the rangers would be present, and this is eliminated. Actually, it's a safety measure for the residents. Thank you.

COL. SWEENEY: Thank you very much.

Next we'll hear from Mrs. Rose Forbrich, also representing herself.

MS. FORBRICH: Hello. I was asked by my husband to speak tonight because he can't be here. He is out of town.

We moved here four years ago, and my husband was one of the engineers that was coming here at great financial cost to us. We discussed it, whether or not we could possibly afford to come here.

I said, "If you have a job that you feel we need to do there for our country, we go. God will provide the way."

It has not been easy. It is not easy to buy a house in this area. We came from Fort Long Beach, Florida.

We sold our house for half of what we had to pay for something here, that I would be glad to share with anyone here. It's certainly not a dump, but it's certainly not too much.

My husband is a colonel. Many people think that colonels are rich. We are not rich. I work. I feel as though I do a very important job in this community. I'm the director of nurses at San Pedro Peninsula Hospital pavilion. I work 10, 12-hour days, as my husband has put in 12, 14, 16-hour days for our country. As you heard tonight, many military people get out and pitch in on projects that are going on in the community. We always have. We have picked up trash on the beaches, we have painted, we have served cookies, we have done all kinds of community things because we know that each place we live is home. They spend a lot of their money because they have to eat and buy clothes and take their kids to the Little League and the Girl Scouts and other things that brings money in.

I thank the Chamber of Commerce for their comments because they seem to kind of understand that some money comes in from us. The military is kind of like retired people; they are on a fixed income. There is no way my husband got a raise coming here. We lived on the same salary in the south, and you can buy a whole lot more in the south than you can here. It's very expensive for the military person to move. It's very expensive for the regular civilian person to move. Anybody who has rented a U-Haul knows what I'm talking about. People think that the military reimburse stuff. You know, you get a certain allowance that pays for

your gas. I figure every time we move there is something to put on the windows and something to put on the floors and something to repair this and replace that, and there is always something that gets broken. But that's the way it's going to be. We do not get reimbursed for what it costs you to move. I guarantee it. If you want to see my husband's accurate bookkeeping on it, I will be glad to show it to you.

We have two children in college. We came into this area and the military gave us -- gave us at that point in 1982 -- $800 for housing. I want you to know that our house payment on a house that is 500 square feet less -- we are selling furniture out in the front yard as we are moving in, after living a month with another military family, God bless them -- our house payment turned out to be $1800 a month. Now, my husband told me I could use these numbers. I don't go around telling people what my house payment is. But I think that the people who think that military people make a whole bunch of bucks need to know that. A lot of people are lucky because you were here 20 years ago and your house maybe cost you 50 or $60,000. Hey, add another 100K onto that now just to start out. Like I told a realtor what I could pay, and she said, "I don't have anything I can show you for that."

I have been a bird watcher. It's nice to watch birds. It's nice to categorize them and be sure and check them off in your book. I have been a promoter of wild flowers by being a garden club chairman. It's also nice to pay the bills. I think the housing is absolutely essential. This

is a very high-cost area, and you certainly don't want military people to be talking about getting more money.

I think the housing is something very, very important. And that's our own opinion. I appreciate you listening to me, and I appreciate getting to hear all of your opinions here tonight. I don't represent a club or a company or, you know, the Chamber of Commerce, all these very important things. I represent me. And I want you to know we love San Pedro so much my husband retired last year; so I am a resident. I am not moving, okay? I thank you for the beautiful feeling that I have here in San Pedro of being at home. Thank you.

COL. SWEENEY: Next we'll hear from Mrs. June Burlingame Smith, also representing herself.

MS. SMITH: Words and wills. That's what this hearing and the previous one concerning the Air Force housing are all about: The will of the people versus the will of the military.

All of the Air Force's argument, unfortunately, is couched in legalese language. It's the language of obfuscation. It's the language used to determine and to gain a singular interest, the language of red tape that bureaucracies use to cloak the injustices of the game that they play. Here tonight it is heavily weighted; again, the legalese language to the nonlegalese people and to the citizens who try in the best of their words to say honestly and truthfully what they feel, what they believe and what they have worked for.

The compromise, therefore, will take two hands clasping, one from each party, not two hands from the same

party. And if an acceptable compromise is not reached to the present process, and the Air Force unfortunately thus far has absolutely no inclination for such a compromise, for those of us that have worked so hard for a state park, not just for the people of San Pedro but for the people of Los Angeles, for the people of the state of California, but for the nation, if that process does not produce a compromise then the resource left to the citizens will be a lawsuit. We will have to turn to the judicial branch of the government in order to resolve this impasse. That day will mostly mean the contending party who has failed to be reasonable and just and the only winners, if such a thing happens, will be the historians and the students of government.

This exercise in the use of power, the voice of the people and the will of the people, will be a costly lesson because the process shows how the people's freedom, their liberties and the pursuit of happiness can be abrogated by the very government that purports to protect them when that government is deaf and dumb to all but a single narrow specialized interest.

Ladies and gentlemen of the Air Force, a piece of empty land doesn't mean that nothing exists there. This

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open coastal land, White Point, is the last coastal land in the County of Los Angeles. And if you take it away from all of us, not just from the citizens of San Pedro but from all of us in the United States to use, you take away the very reason of our being, because you destroy the very land that could provide all of us the space for a meaningful and harmonious

life. Thank you.

COL. SWEENEY: Thank you.

The next speaker will be Mr. Arthur Almeda from the San Pedro Bay Historical Society.

MR. SEMARIS: Mr. Almeda is presiding at a fundraiser for the restoration of the Moller house and asked me to read this letter, and I will submit it later.

My name is William Semaris. "To the U.S. Air Force: Dear Sirs, you may be speculating as to why the San Pedro Bay Historical Society has been so adamant against the Air Force's plans for top rank officer housing.

"To begin with, on Article 11 under Section 2, the language is very specific regarding our reason of existence. The section reads: The society shall work for the preservation and restoration of art, historical, architecture, historical site and monuments in the area. In addition, Section 5 regards specifically the following: The society recognizes, emphasizes and seeks to preserve the unique nature of the San Pedro community as a place where people of all ages, various ages and ethnic backgrounds and economic situations live, work and play together in a potpourri of buildings and parks with a wide gap of architectural styles and purposes. This society will be delinquent in its duty not to oppose the use of White Point as you propose no matter what emergency action you may invoke. You may well be convinced that your cause is just and right because you have behind you the power and glory of the president in the Pentagon. But for us who do not defend

what we perceive to be a noble and righteous endeavor would mean abrogating our American right or obligation to oppose you with all our might in an acceptable legal manner. We do not oppose your presence in our fair community. It is a historical fact that the military has been a part of San Pedro since before World War I. All of this talk about San Pedrans being antimilitary is nonsensical. We welcome the United States services to be our neighbors, but please do not ask us to relinquish one bit of land that is open to enjoy freely as God intended it. Respectfully, Arthur Almeda, President, San Pedro Bay Historical Society." Thank you.

COL. SWEENEY: Thank you.

Our next speaker will be Gregory L. Smith from the Point Fermin Residents Association.

MR. SMITH: I represent the homeowners group that wraps around the middle reservation, the previous construction project by the Air Force before the present one that we are discussing. We have had positive and negative reactions to that construction project.

The positive is that I have been on that very compound and visited housing belonging to everything from sergeants to majors; common wall construction for majors -- I believe that's field grade -- and I believe they are well housed. And by my understanding, the Air Force does a better job of housing personnel than the other services, and has for some time.

On the negative aspect, a couple nine-year olds chose, rather than walking the eight blocks to get to an

Air Force chum's house -- there is only one entrace to the Air Force compound -- to go over a fence. The security put their names in the book. They had no response to that. However, the morning newspaper delivery man going around in his pickup was similarly reprimanded by the security in the compound. He had a recourse. He had kept track of several mornings when the security man at the gate had been asleep when he went in to deliver the papers. So we have seen the good and bad. Jacob Gutierrez speaks accurately of the very real effort he made almost after construction was started and continuing on that base. But long before, in the nature of this kind of process we're involved with, the only hearing that the Air Force had concerning that housing was where, not here; in Monterey. And only one citizen of San Pedro had to pay his way to testify in that hearing. The Air Force is getting increasingly cooperative and increasingly concerned about public relations. And I think that my wife's statement is true. It's a mixture of an iron fist and a blue-jacketed glove. We get cooperation, but we also get a very clear consistent meaning that they are not going to compromise. And that comes through the councilwoman's office in a very strong way, which I would like to speak about. I only have a couple minutes. I submitted a detailed letter at the scoping session, and I won't repeat that. It will be in the draft and get the attention of consultants, I believe. I just chose to limit my comments to a specific. A more viable alternative to the upper reservation would be to begin by considering a buildable area of about 36 acres including

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the old building immediately north of the Korean bell parking lot, plus all the area ringed by Marion and O'Leary and the hillslope on the north, in this case through which the unused parcel below Saxon Road. That's the one that's up the road from about Gaffey and 30th, to use that or portions of that hillslope on the extreme north end of the upper fort and the neighborhoods adjacent to that are within our residential association, mixed, some single-family dwellings, some recent dwellings and some recent new single-family dwellings. And the coherent plan, it seems to me, is to put up some common wall townhouses, some single-family homes, if you need them for your senior officers, and merging into the neighborhood.

Planning should also include recruiting the existing roadways. Urban renewal you strike out the old roadways and put in suitable access, or something like that, that would allow more buildable acres.

And the further alternative would be the use, or at least the considered use of the site of Gaffey pool and perhaps the pool with it, which will be moved from the existing housing, or relocated where the pistol range is immediately west of the Korean bell. Dismissing, as the document does, the even smaller portion of the upper fort, it only deals with 21 acres because of demolition costs.

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The concerned conclusion of people that know cost figures in your document, the demolition cost will be incurred elsewhere. Anybody that walked around the upper Nike site within the 40 acres at White Point knows that there will be

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enormous demolition costs of a facility that sheltered nuclear warhead missiles. So a detailed study of comparable demolition costs should be a component of the consideration of all the sites and a supplementary study that is needed to make this an acceptable environmental impact statement. I have included a sketch map and I will turn it in.

The basic question I have is why, when you consider the alternatives involving Bogdanovich Park and the upper fort, why did you choose all or none? That is why I say, it's 21 acres, only 21 acres or none. Why in the case of Bogdanovich Park is it 60-1/2 acres or none. The parcel at White Point is a dozen different configurations, but you have a self-serving selecting criteria that eliminated all flexibility of planning dealing with Bogdanovich and the upper fort. Finally, just back to the general point, I was delighted when Bill Semaris came forward, but he wasn't up to his real form, so let me make a couple points. The Air Force has made no effort towards compromise. If they had, they wouldn't have been talking to the state park people. The state park people, state budget, has funds that can be used to trade enhanced value of the property for money. If the Air Force were willing to waive the reversion clause, and it's wholly within their discretion of the Department of Defense, as to whether the reversion clause can be waived, if they waive the reversion clause the state budget, the state park people could probably ante up 2, $3 million because of the enhanced value of that property. And I would expect that the Air Force could use two or three additional

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million dollars for housing.

On the second thing, the Air Force is absolutely uncooperative in response to Councilwoman Flores' question about Bogdanovich Park. They have put three locations at the lowest priority, and that is just not the case with other military services, when it is possible to be relocated down on Paseo Del Mar. There is something inconsistent about the military apparatus if the Navy can find $400,000 to relocate it and the Air Force cannot take a single step towards a congresswoman, who is the person to speak to in this district towards an accommodation for any kind of maneuver.

The final thing, I thought that, of course, I would welcome Bill Semaris to comment, cut through what seems to me a lot of syrup that has been poured on us tonight. Thank you.

COL. SWEENEY: Thank you.

COL. RODGERS: I would like to make a couple of comments in reply to some of Mr. Smith's remarks.

You mentioned items such as relocation of the swimming pool at Gaffey, and I'd just like to reiterate that, one, we are on a fixed budget with the family housing. We asked congress for a certain amount of money, and in their inifinite wisdom they said we could get along with less. And we are going to get along with less. As I said before, it comes down to about $72,000 per house. And anyone who has been out looking for housing lately can see that that is not an extravagant amount of money to go out and procure new

housing. So, unlike the Navy, who had money specifically authorized by congress for the relocation of those facilities, there is no such line item in the Air Force authorization to build the housing, and we would need specific congressional authorization to do that.

As to not making efforts with the city of Los Angeles in negotiation, I would just let our record stand for itself. Again to reiterate, we did have an offer to the councilperson from San Pedro since the 17th of December and we have not had a reply to it to date.

COL. SWEENEY: Thank you. I would like to thank the speakers in particular for making an effort to keep their remarks brief to assure everyone will have an opportunity to be heard. We have gone through some 23 speakers already, and it looks like we'll have an opportunity to have everyone speak.

Our next speaker will be Mr. Ed Vincent speaking for the White Point Historical Park.

MR. VINCENT: My name is Ed Vincent. Let's make White Point a place to stop the wars, and not provoke them. Overlooking the Pacific, it provides a great setting for a peace park. Each nation should construct and maintain a peace pointer, symbols of peace and freedom like the Korean Friendship Bell that stands out as a virtual message to people of all nations. This park would not only invite peace thoughts from all people, but would provide an ideal setting for regular visits from peace-thinking people. Abuses of mankind must cease so our children and grandchildren can have a

fruitful and worthy life. As a matter of fact, if there is to be any life at all we need to call a stop to the development of destruction.

White Point would be a great center for the constructive development of mankind. White Point is about as far as we can go without drowning. Taxpayers are the ones at the end of the line, and it's time to take a stand. The U.S. military already spends so much for defense, most of us don't have anything left to defend.

Too much of the time we see elite welfare recipients to the military/industrial conspiracy fleecing the taxpayer. Destructive devices already have reached beyond mankind's ability to control them. Weapons are so sophisticated that ordinary soldiers cannot be trained to operate them or our accountants cannot keep track of over-expenditures and resulting ripoffs. Let us build a state park dedicated to stopping war, which will in turn utilize wasted and stolen money in a search for peace. Let us say no to this outrageous land grab and build a constructive development center there.

COL. SWEENEY: Thank you.

The next speaker will be Ms. Nancy Dewey from the Estates Homeowners Association.

MS. DEWEY: On the part of the Board of Directors of the Estates Homeowners Association and myself personally, we would like to commend the United States Air Force for its thoroughness in researching and preparing the extensive report on housing alternatives in the EIS.

We agree that the United States Air Force housing on one site is preferred, not only for the Air Force but for the community as well. We do not wish to see our community denied its very active use of Bogdanovich Park. We believe and agree with the San Pedro Chamber of Commerce that there is sufficient acreage at White Point to satisfy the needs of both the Air Force and the community; therefore, we favor either the recommended housing project in the EIS or Alternative A.

In closing, I would like to say we are proud to have and would like to welcome the United States Air Force to our community. Thank you.

COL. SWEENEY: Thank you, Ms. Dewey.

Next we'll hear from Mr. Alfred Saddler from the Sierra Club, the Palos Verdes South Bay Regional Group.

MR. SADDLER: Good evening, and congratulations to the preparers of the document and the word processors of the draft document. There were just some key, a number of phrases that were just, glancing through it, becomes a little stylistic. I'm the chairman of the South Bay Group of the Sierra Club. I live here in San Pedro. I am here to speak for the 4,000 members of the Sierra Club South Bay Group and over 300 members here in San Pedro.

The Sierra Club has a long-standing commitment for the restoration of the coastal area for public use and enjoyment. The Draft EIS on Air Force housing at White Point is deficient because it seriously neglects to mention the most important issue, the removal, possibly, of the state

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park at White Point. Senator Beverly, who represents the area, authorized that the concurrent resolution No. 9, the state park at White Point, and the introduction basically points out what an ideal site for a park this would be. The public hearing for the state park proposal a couple years ago, which was passed, officials of the California Department of Parks and Recreation Department have been quite enthusiastic about the possibility of a park here, and they are also convinced that if 40 acres are taken out there would not be enough land to make a feasible state park; therefore, your preferred alternative amounts to denial the state park and the best opportunity for a park at White Point.

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The EIS for the Air Force housing should discuss these issues on a state park. And in terms of wildlife habitat at White Point, it provides space for owls, flat-shouldered kites and a variety of smaller birds and the seeds, insects and smaller animals which they feed upon. If it is restored with new vegetation, the wildlife habitat would be much richer. And a state park at White Point would also provide numerous recreational and educational opportunities and spiritual motivation.

Basically, I feel that the Air Force has not seriously considered any alternative other than the alternative which they decided they want to go for. If you had put as much effort into lobbying congress as you put into the missile process, I suspect that you would have been able to get some increased amount of money for buying parcels of land elsewhere

or for mitigating some of the effects of what you are proposing to do here. Constructing housing at any of the primary locations proposed for this development is going to have a significant adverse impact on the resources available to the community of San Pedro, and in some cases to the people of Los Angeles and indeed to the state.

255 Environmental Impact Statement should examine the cost of mitigating the impact to the local community of development at the various locations considered whether they build replacement soccer fields on state land, replacing the park value at White Point or whatever is appropriate. The Sierra Club has had numerous hikes over the years on the White Point property, introducing quite a few people to the grandeur of the area. It's good terrain for a nice easy two or three-hour hike, as well as having, of course, very interesting historical significance.

And to get down to nitpicking, I was struck

256 by your estimate for the cost of living in L.A. Specifically, your estimates for utility bills seem outlandishly high, unless you are trying to throw in some two or three hundred dollar a month phone bills. Just $80 or a hundred dollars at the outside seems much more appropriate than your $300.

257 Is this going to be the last housing proposal for San Pedro or are others coming down the turnpike? Would the Air Force support removal of the reversionary clause from the remainder of White Point if some compromise or some portion of it, and for that matter, just to go to Bogdanovich and possibly a couple areas or replacing others? Is this something that

has been referred to before? It's a source of great concern.

COL. SWEENEY: Are you concluding your remarks? Are those questions?

MR. SADDLER: Yes.

COL. SWEENEY: Col. Rodgers and his team will attempt to answer your questions.

COL. RODGERS: I would like to comment on whether other housing is coming down the pike. We programmed housing and requested funds through congress based normally on warrants. This project completed the requirements that were known at the time of the program based on the requirements. I don't have a crystal ball. I don't know what is going to happen to the defense needs in the future, whether the Space Division might be expanding at some time. To say that -- to tell you that there won't be any further family military housing requirements forever in the future, I can't say.

What I can tell you is this: That in the last offer we made to the city of Los Angeles, part of that offer was that we agreed to support the removal of the reversionary rights on the remainder of White Point. So that should be a point that needs to be made now. And in fact, we got the letter to show anybody that would be interested in it following this meeting.

COL. SWEENEY: Thank you very much, Mr. Saddler.

The next speaker will be Mr. Noah Monasette from the San Pedro Peninsula Homeowners Coalition.

MR. MONASETTE: Thank you, Mr. Chair, and particularly thank you for taking me later after other individuals. I

represent 13 associations and homeowners in the community, about 8,000 homes. By the way, I was talking back here * with Ken Roy who spoke to you earlier. Many of you, particularly the Air Force visitors here tonight, don't know that about seven or more years ago Ken started the drive for a state park here, and I told him he just ought to be ashamed of himself, that here he has been able to have the power to keep them out of the hands of the Air Force officers. You know, you really are bad. This impact statement, as you can tell from what you have heard, and I'll just capitalize "flawed." You asked me to address the adequacy of it. It's inadequate. It's inaccurate and it's illogical. Now, it's inadequate because you tell us that you want us to come to hearings and express ourselves, and the document has one line on the hearing. And you say that 258 the way -- what you mean there, really, is that "we will mail you the report." That's not communication; that's just command. So it's inadequate in that sense. And that's really insulting.

It's inaccurate. You have already heard how it's inaccurate. It doesn't address itself to many adjustments * 259 that have been made during the process, relatively recent adjustments; changes the Chamber took in its position; changes that the homeowners living contiguous to the space made apparent. It doesn't change, but they made them very apparent. These aren't commented about or alluded to or included in your comments. So it's inaccurate. We are talking about something that is ancient rather than modern.

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And of course it's illogical, as you have already heard, because it says you will present options, we will present alternatives, but we will not grant most of the alternatives. That's illogical. That's not a statement; that's a decision. That means that you spent so much of our money for no real purpose. It's our money and you have spent it for this study that doesn't study or for a statement that is a decision. And that's insulting. So the coalition hopes that we don't have to keep wasting money; the coalition hopes that you don't have to have a final EIS. But if you choose to let the juggernaut of the process keep driving you, then please include in it accurate, logical, complete responses from the community.

COL. SWEENEY: Thank you, sir.

Our next speaker is Mr. Mike Lansing representing the youth of San Pedro.

MR. LANSING: First of all, I'd like to say that I am the athletic director at Mary Star of the Sea High School, which of course would be, normally, affected if Bogdanovich Park is used as the site. However, I'm not representing Mary Star High School, because if that should happen only 400 people, approximately, from our community would be affected.

What I am representing are the youth of today and the youth of the future of San Pedro. And I'm going to digress a little bit and give a short history of our community. But I think it's important because I think it's been passed over.

I have been involved in youth sports in

San Pedro since I was eight years old, and since 1966 to the present date, 1986, we have had four athletic facilities closed in our community. At the same time, four athletic facilities have been built here. In 20 years we have grown, and at the same time we have seen our major athletic facilities be limited to only four days use per week. And also, with this proposal, we might lose another facility: Obviously, Bogdanovich. Although it's been brought up by numerous people that that is not a big deal because it will probably be or will be relocated. I will get to that in a second.

With the youth programs and activities that go here in San Pedro, they do not represent just the children of San Pedro, they represent the children of Miraleste, Wilmington, Lomita, Palos Verdes, because our area is very limited in the amount of facilities that we have. And every time we trade off a facility for a like facility, and every time our population grows we just keep painting ourselves back into a corner and we find out in a few years we do not have anyplace to play. We are not going to have a place. It's happening already. I don't know if you come by Peck Park ever, but I worked at this park for quite a few years and coached here, and also San Pedro Park, and if you practice any kind of youth sport, soccer, football, baseball, basketball, within the limited facilities that we have, you find out the kids are practicing on top of each other, they are fighting and clawing for a little piece of land to practice. You have coaches getting there an hour or two hours before

practice to sign up for a place to play; you have parents showing up in their lawn chairs to reserve a space to hopefully have a place to practice and get together or have a pickup game or whatever. We are running out of space in this community, and it's becoming a bigger and bigger problem every year.

We have a proposal up that will affect our environment because it could eventually make it become a point that we don't have anyplace for our kids, where it becomes just a built-up community.

A couple of facts and opinions. First of all, a lot of people stated that if the Air Force were to use Bogdanovich Park that we would have another facility that would be relocated in lieu of Bogdanovich Park. Now, I don't know if somebody was misconstruing this or this was a fact, but going from page 3-24 in the EIS statement, I would like to quote, "The United States Air Force will contribute to the cost of replacement fields on land provided by the city provided sufficient funds remain after the contracts for construction are let and the construction cost of the housing to the government is reasonable. No funds or replacement fields are included in the project budget because no funds were needed to put up on the White Point site originally planned. So we have a little bit of a miscommunication on that point.

Second of all, we are not at the point where we can trade off one athletic field for another. Our community needs more athletic facilities, more recreational

facilities. And as Mr. Nevins stated a while ago, we have to get together, all the groups that are concerned, and work out a plan so that everyone gets their fair share. We cannot have a state park in lieu of an athletic field or a recreational facility. We have to have both. And we can't take one in lieu of the other. Both are important. We can't say one is more important than the other, because who is going to make that judgment? Youth is going to use both of those facilities. The grown-up people are going to use both of those facilities. So we can't just trade one off for the other.

Also, I'd like to -- if the Air Force is going to use part of the White Point area, I'd like the people who are planning the state park to reconsider having the state park on a lesser facility. It seems to me it's getting to the point, well, either we want all of it or we don't want any of it. And if it comes down to push to shove, we are either going to have a state park at 65 acres or we are not going to have a state park, then I suggest that we sit down and figure out a way to have both. Because if it's going to include the Air Force, that's fine, but let's get everything for our community that we can and not just pass things off.

My proposal is very short and sweet: If you, if the Air Force is going to build on the White Point parcel, before they do so they must deed back all remaining lands at White Point and deed back all Bogdanovich Park. And no more reversionary clauses. Those will stay as state and

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local parks for our community. If the people from the state parks feel that is not enough area for a state park, then the land would go to the Parks and Recreation Department. If the Parks and Recreation Department does not have funds to build a facility on that site immediately, then it would be held in abeyance until later when the funds did become available for more facilities to be built there. However, I hope that the state park could work out the compromise and make it into a worthwhile facility.

We have a lot of special interest groups here. The Air Force has a special interest group. We have the different societies for wildlife and for nature and stuff; we have the homeowners associations, and we are talking about endangered species. Believe it or not, the children of our society are an endangered species. We are running out of room and there is nowhere else to go. In 20 years we have gone backwards in recreational facilities in this community, and if we don't stop trading off and if we don't stop just keeping status quo, in another 20 years we will have three less athletic facilities and then five less and then we will have none, and San Pedro will no longer be a family-oriented community; it will turn into an adult-only community, a leisure word, if you will. And we did that because we couldn't sit down and figure out a way to get everybody together and work out a plan.

I hope I didn't step on too many toes. I hope we can work it out and make it best for everybody.

COL. SWEENEY: Thank you very much.

Next we'll hear from Maj. Curt Links from the Longfield Pony League baseball.

MAJ. LINKS: Good evening. My name is Curt Links. I'm a member of the Pony League program here in San Pedro. I really enjoyed our last speaker, too, because to me he talked about the subject that was the most dear to my heart, and that's what I consider to be the future, not just of San Pedro but of our nation. That's our youth. And coming here tonight, you know, speaking, whether it's a blue suit or a resident of San Pedro, that's a topic we have to dwell on, because I don't think we give the kids, the youth of our community, enough attention.

At Longfield we had a tremendous year. 1986, our program extended from 21 teams to 27, which is an expansion of about 27 percent. This isn't just saying we aren't the only program in town that has had a great deal of success this year. Parents are becoming more concerned with what their kids are doing. These are not just sports programs for kids for boys, but they are also sports programs for girls, because you see more and more girls getting involved in team programs, Bobby Sox programs, whatever. You see them in the soccer programs, which I'm sure you are going to hear about a little later on tonight.

This increase in participation can lead to some major problems here in San Pedro. Tonight or any night during the week, any weekday night you can go over to the small part of San Pedro Park and you can find between 36 and 50 kids four to six all vying for baseball fields. Now you

say okay, they have a field there to practice, they should be happy with that. There are parents trying to see getting in the way of baseball playing between kids coaching their kids, the balls, it's a matter of time before somebody gets hurt. And essentially, when we look at the topographies of the area such as Bogdanovich Park for housing, when in fact the community needs the current recreation facilities that our kids have that use -- Mary Star uses the facility; a number of kids from Longfield go down there. When you sacrifice that for housing without a replacement in kind right now, the only people it will hurt, you know, historically you hear the four-legged species. We are hurting the two-legged folks that are going to follow on. I think that's a consideration of this community, whether it be the Air Force or the civilians. Thank you.

7 COL. SWEENEY: Next we'll hear from Mr. Robert Bryant, American Youth Soccer Organization.

MR. BRYANT: Thank you very much. My name is Robert Bryant, AYSO. One of the things that I have sat through now for two meetings and a meeting with the city of San Pedro, I have yet to hear one person, one person in favor of giving up Bogdanovich. And some say it's a very crucial part of what we are talking about in this report. There has not been one organization that stood up here tonight, there has not been one organization in this entire program that has been in favor of giving up Bogdanovich Park. AYSO is an organization that is devoted to the youth. No one in this organization gets paid. It is strictly voluntary.

I suspect -- this year, right now we have 1,078 children participate in the program, and I expect this year we will have close to 1,400. 1,400 kids, ladies and gentlemen. Do you realize that Bogdanovich is the only place, basically, that we have in this community that our children can practice on when the schools are not open. We have Peck Park, that's true. I am very ashamed of the way Peck Park has been handled. But Bogdanovich is a place where we can have lights. Funds have been designated for that. There are children -- ladies and gentlemen, this is the next generation. Now, I find it amusing, almost, that people have come up here and shown a great deal of interest towards the flowers and the birds and the bees. So do I.

I was born and raised in San Pedro. I'm a native. But, gentlemen, for what our Mary Star representative said, we have two-legged people, too; and that's our children. And it appears to me that people that are in our community -- this is not coming from the Air Force, gentlemen -- are willing to sacrifice. In fact, I heard that one group was saying, well, this problem is going to go away. It's just here on the surface. They talk about replacing one soccer field at Bogdanovich.

Ladies and gentlemen, Bogdanovich is a big complex, and I guarantee that once this thing is settled we are going to have two soccer fields up there. This is a growing program. We are not going backwards.

I don't know if you have all traveled around -- I have -- on the freeways and see a little bit of the

communities that are not half as nice as ours. They have major commitments to the youth. We are sitting here willing to sacrifice our youth program. It's the first time, I have to admit, and I apologize and I'm ashamed at this kind of an attitude.

One of the things I would like to have you include in your report, Bogdanovich is a very important facility. It is probably the most ideal place to play soccer because it's excluded, it's up high in the air, lights have been proposed to put on the site, the fire station is right next door.

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We all have to realize that at any kind of an athletic program there is a degree of danger. There was a little boy that was hurt on one of the fields. We had immediate first aid on the field. If we move the complex to a second site, it's going to be less than desirable. And that will be that. The impact on our community will be that much greater.

Second, as I understand Bogdanovich was built on a partial grant from the State of California. I might be wrong, but I would like to have you look into that. And I believe from what I have heard that if they took Bogdanovich, there is a strong possibility that the City of Los Angeles, and rightfully so, because the city is doing this, will have to repay the state for the cost of building Bogdanovich and let us figure out what we are going to do with the rest of it.

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You know, there is a lot of other things that I'd like to talk about, but I think I would like to address

a personal aspect. A year ago -- I am in charge of a hundred teams, close to it, and I couldn't find one of our community adults to coach a team. Well, the regional commissioner has a lot of authority. I didn't ask for this job, but it just came. And I picked up the phone and I called a man. I didn't know who he was. I didn't know who he was. And I did something that I swore I would never do, because I have 13 kids, 13 children that were not going to participate in our program because I couldn't find 13 people, one of the 13 to be a coach. I called this man on the phone and I said, Mr. So and So -- I can't remember his name -- I said, would you like to have your son participate in our program? He says absolutely. I said, if you will be the coach, I will personally override my rule on numbers of children and I will put your son on this team. And that took a lot on my part because I was breaking one of my rules. I was so intense on trying to have a program throughout the system.

You know what his answer was? He says, wait a minute. I want these children to play. If you don't want to put my son on the team, that's fine. He had never coached before, by the way. And he said, but I would be willing to coach without my son. I said would you? That's something else. Because I can't get anybody else to do it.

We put him on the team. He never coached before in his life. He had a meeting in Las Vegas one weekend, and he left the weekend early, flew all night long to come to a soccer game on a Saturday. This particular

gentleman was in the military. We have higher participation per capita through the military than we do from our regular citizens. And as far as I'm concerned, when I hear people accusing the military of being someone that I would not want to have in my community -- and I don't have the answer to this, gentlemen -- but I know one thing, I would love to have a neighbor of mine be a military officer.

I have a team, a boy's team that had a chance to go outside of our community and represent San Pedro -- and nobody has been prouder of San Pedro than I have. And no one talks against San Pedro in my presence. He turned around and took a team. The only thing he was interested in was helping the children. I think you people in the service ought to be commended for your attitude and towards what you have been able to do. You know, I really honestly believe, and I believed this from the very start, that this problem is a solvable problem if we can just sit down and talk.

I turned around and called one member that I had admired. He's a nice guy. I asked if I could sit down and talk with him in the presence of your general -- and I have not met him so I don't know who he is -- and do you know what his answer was: No.

We have leaders out here that are representing us that I question whether they are doing a good job or not.

Now, I know that the Air Force has had problems in communications, but I really don't believe that there is anything that we can't sit down and solve. You know, the

part that is making me the most angry is that everybody keeps saying about this park in a meeting that I had -- the first meeting, by the way, that I was invited to, I believe it was the end of November, first of December, I turned around -- and I will finish up here in a second -- I turned around and asked if I could talk to the representative from the state park. Yes. I said, is it six acres or is it seven acres. That I won't take. I don't know. How about nine acres? I don't know.

I do not like having a state representative come in here and cause this kind of grief within our people. He's after the -- I think personally -- well, I won't commit myself to that. Thank you, gentlemen.

COL. SWEENEY: Our next speaker will be Mr. Nick Lincir, also of the AYSO.

MR. LINCIR: I'm Nick Lincir. I was the former commissioner before Bob Bryant. I'm now the L.A. director for the South Bay area.

I'm glad that we were given the last portion of the program. Since we are coaches we are used to it. But the question of Bogdanovich, some of us go back several years when Bogdanovich was nothing but a mountain with the old housing torn down.

At that time some of our people at the AYSO set out around town to find a flat spot so that our children could kick a soccer ball around. It was very difficult to find any of that. A lot of our children had to be bused or driven to fields outside of the city.

Finally, the Bogdanovich proposal for a soccer field and a sports complex was initiated. I remember that the year was 1976. It took eight years of hard work behind the scenes to get anyone to move on our actual soccer field.

Finally, two years ago this field was inaugurated. I feel that the Bogdanovich facility is essential, if not vital, to the youth of this community. I am familiar with the sites and fields all around us, Torrance, Palos Verdes, Rolling Hills. They have many, many more fields. Here, because of our hilly area, we are not fortunate to have that. Our schools do not have soccer fields; they have asphalt. The numbers that Bob Bryant cited continue to multiply, and to see a facility that we worked so hard for be taken out from under us I believe is appalling.

I am happy to hear the gentlemen who was here from the service that was a coach. And I also spoke to some of the people from Colorado who say that at Colorado Springs Air Force Base they have seven soccer fields. If you gentlemen would only bring one of those to San Pedro, you can have Bogdanovich. Thank you very much.

COL. SWEENEY: The next speaker will be Col. Pete Wilkinson.

COL. WILKINSON: I'm Pete Wilkinson and I'm going to address the same subject. I have been coaching youth soccer for 13 years. The issue is well apparent. I will say that I started coaching in Virginia, went to Massachusetts, Montgomery, Alabama; Redlands, California and then down here. And the issue always was giving away developed facilities

for kids to play soccer or for some other use in the community. And I spent 14 years fighting that.

What I like about this public hearing is that I hope it puts you all on a guilt trip that you hadn't thought about the kids, because that's definitely the future and that definitely has to be thought about. We hear a lot of good things about sports.

I will tell you a short story. I overheard a coach talking to the team after practice, and he was saying, what do you think about what you are doing. They discussed the fact that they were developing their bodies, developing their minds. You know, they were getting better at things, more disciplined, relaxed in coming together and it was really working nice for them. And the coach dropped a zinger. He said, don't you think that it would be stupid to mess it up with drugs? And every kid nodded his head and said, you bet. Thank you very much.

COL SWEENEY: Thank you, Col. Wilkinson.

Our next speaker is Ms. Bonnie Christianson representing herself.

MS. CHRISTIANSON: Thank you. I am Bonnie Christianson, a resident of San Pedro.

264 Information has come to me also that the $860,000 given by the state to the city for Bogdanovich Park would need to be repaid if housing were at Bogdanovich Park. That being the case, it leaves White Point. It was interesting today when I was sitting in the workshop on gangs in the harbor area. There were about seven parents and school

officials, and the gentleman talking was going along and telling us all about the gangs here in the harbor area, and he said that that fiasco that is going on in San Pedro with the Air Force and the gangs or the Air Force and White Point, he said if they only realized the gangs that are in there, and the state parks now house gangs, how much better it would be to house Air Force than gangs of all the gangs that are in the park.

A recent -- some of the speakers here today have talked about hazardous materials. I wonder have those speakers recently looked at the propane tanks at Gaffey and Westmont and when are they going to move those tanks at 22nd Street, the hazardous materials? I have a feeling that the Air Force would be much more expeditious in moving any hazardous materials.

Talking about the national defense, I don't have my flag with me but I'm sure you can visualize it, in this day and age of technology -- and this is the Space Division personnel, and believe it or not there are personnel living here in San Pedro that do put their lives on the line daily. We are not all aware of some of the hazards and some of the daily things that these men in personnel and women go through. And then the speaker talked about subsidy. I don't want to pay any more taxes on subsidies, please. Another person mentioned the encroachment. The Air Force already told us that a clear deed would be given on the rest of the property. Then there seemed to be a chastising of the fact that the military showed up tonight. They are here in this

room. Thank God this is a free country where the military as well as the civilians can come out in support for what they need.

The science magnet. I happen to be one of the associate authors who augmented it in the Los Angeles Unified School District when they started about 11 years ago. I also was one of the people that helped place the Marine magnet in our San Pedro High School. I cannot believe that housing on less than half of White Point property would in any way keep our youngsters from working in the tidepools or any other park. If they need the right of access, I'm sure the Air Force would give that right of access.

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A park with the hundreds of people coming from all over the country, this sort of thing, would that keep our wildlife there? With a state park, would a whole lot of people coming in there keep our wildlife there? There is no reason why we cannot have both housing and a wildlife refuge. Forget the state park. A refuge for wildlife.

I might mention there are two entries to Fort MacArthur, 24th Street and 30th Street. It was interesting that someone mentioned about someone getting their name in the book because they tried to go over the fence. I have to tell you there is an 11:30 curfew for the personnel inside for the youngsters, and few youngsters try to go over the fence. That's our Air Force personnel.

COL. SWEENEY: Would you begin to sign off, please.

MS. CHRISTIANSON: Yes. The Air Force is holding out their hands; it's up to us to accept it. Thank you.

COL. SWEENEY: Our next speaker is Vince Yobich representing the South Bay.

MR. YOBICH: First, I'd like to thank you for the opportunity to be able to speak. I think it's great. And I would like to thank all of the military people here. I think, like everyone else, I appreciate living in this country where we are defended and the sacrifice people make on an ongoing basis. And finally, I would like to thank all of the other speakers, because certainly listening tonight to both sides, I just learned a lot from the time I have been here that I didn't know before I came.

I would like to talk about three things. The first one is about what I consider an ineffective Environmental Impact Statement and some options; second, about a potential park; and third, about what I would have to say in detail about the lack of viable options.

I might mention today, I arrived from Sacramento a little bit late. I was leaving the airport in Sacramento. Our plane took off. It flew about four minutes in the air and we came, circled around and landed again and we spent about 15 minutes on the ground, maybe half an hour and they took off again and came to LAX. On the way I asked one of the stewardesses why did we take off and land and take off again. She said, well, the pilot noticed there was something wrong with the engine. And I said oh, you mean they fixed it? She said no, we changed pilots. The process that we are in somewhat reminds me a lot of that. In this room are the people that will change roles and stuff. I see something

fundamentally wrong with the engine, whether it's the people sitting on the podium, who I don't think are primary decision-makers, or the people in the audience who, unfortunately, are not either. But what I'm talking about is a lack of thoroughness in this plan, a lack of what I would call intellectual integrity overall. It seems like all of the options are jumping around. It sort of said here's what we are going to do and let's see various ways we can do it, not choosing a viable option. And thoroughness, which would be a state park, I can quote one sentence that comes up that says it's become apparent that the construction of military housing is the only feasible alternative. That's it. And I think there is more possibilities than that that were not adequately discussed. There is a technical matter in the plan. I have to say I think the impact that it states on recreational facilities, schools, freeways and et cetera, is in my opinion somewhat understated. That's putting it mildly.

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Second, I want to mention about the potential park. I could read it, but just let me mention it without reading it.

All of us know, we heard there are no other potential sites. I mean, this is the last chance. I used to live in San Francisco and there was a beautiful place north of San Francisco, the Redlands, where a lot of people were talking about a park there. There were also needs for military housing, but there was a place put aside, you know, what is nice about it, I used to work in the antipoverty

program up there. There was a place where the people could work out their, what we call the crazies. And I think that's what I think some people are alluding to here. I think that's what is really missed here. You pay for the place in the long run by the quality of life. It seems to get more difficult to solve and we find ourselves yelling at each other at various times and we don't really know why.

I am going to submit a map, either now or later, which shows -- I'm sure everyone has seen it -- within the same distance of these sites from the Air Force Space Division, you are looking at most of the Metropolitan Los Angeles area, and it's my feeling that a thorough objective analysis would develop other options for the sites for giving good housing to the military. And I think the use of the park is just one thing that we owe to our children not to let that place get away. My wife is pregnant and I would like to be able to say hey, we didn't use up every square inch for housing; we left something for you to see what it was like. I know everyone can appreciate that. I don't think that it means any group has to get cut out or whether they like soccer, housing or et cetera.

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The third thing I was mentioning was what I call the lack of viable options. And I alluded to this throughout this. I think part of the reason for lack of viable options, when I worked at major institutions like the Air Force, it's very difficult to take a risk and risk a career advance by doing anything other than staying with the party line. And I don't think we are going to see a lot

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of viable options as long as this presentation is being made from the Air Force. I really think -- it was proposed a lawsuit. I love lawyers as much as everybody else does, but that may be the only thing left. I'm suspicious of this. I used to prepare these kinds of similar kinds of things, feasibility studies and the sort.

After looking at it I get the feeling overall, to make one comment, I smell a rat. And I'm not trying to imply somebody is doing something evil or wrong, because I don't think anybody is doing that in this case. What it reminds me of is a comment about the difference between communism and capitalism. You know, mankind exploits capitalism and communism exploits mankind.

The big question I'm left with at this point is simply to say what is next; to use that Peggy Lee song: Is That All There Is. If all we are going to do is make

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comments or are we going to respond and then get the results of the response. I'm just saying that is not enough for the kind of society that we all enjoy living in, and I think we can do better than that. I think we can arrive at a decent solution that looks at everyone's interest without just drawing this one, that once it's destroyed it will be gone. And that's all I have to say.

COL. RODGERS: I'm not trying to be sarcastic, but the point I want to make is that I have researched the literature on the subject, studies by various independent agencies that have gone back seven or eight years looking for a suitable housing site for Space Division. Other than

the middle reservation of Fort MacArthur, if anybody knows of one, let me know, because we haven't found one that is not going to hurt someone. It's going to hurt the AYSO or the kids or the flowers and the trees and the wildlife. If there is one out there, we'd sure like to know about it.

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A VOICE IN THE AUDIENCE: How about the parade ground at Fort MacArthur?

COL. SWEENEY: Our next speaker is John Parker.

MR. PARKER: I am an armed service veteran. I have been employed for 36 years in the missile space industry covering the armed services, United States government, civil service, and also my family has had to move periodically. We moved 10 times our first 13 years with my company, and that was in most cases in different states, not from just one side of town to the other.

The housing shortage at one location was so bad that we had to sign up for a house and put a deposit down six months before the tract house would be built. And then when we left that location, we ended up, luckily, giving it away to a school teacher when we transferred to another location. So finding adequate housing is only one of the problems that my family encountered. Some of the other things that have not been discussed, and that's because we are only discussing housing. Look at the school children. School children have to go to new schools, they have new teachers, they have new friends in school, they have new friends in their neighborhood, civic, community and religious participation interruption to our family, morale of the family,

stress on the family, household damage during the move, or even loss of household items, economy on the family, financial problems, locating adequate medical facilities, disruption of permanent mailing address, additional family wardrobes because of different weather conditions at new locations, additional automobile expenses, license tags and registration, leaving loved ones, friends and families behind. That was the worst in our case. We just moved here nine months ago from San Jose. We have three children there and three grandchildren there. So my family is very aware of the service family difficulties.

I'm representing the Air Force Social Chapter 147 with 1,403 members. The Air Force community keeps their homes well-kept to enhance the neighborhood, the same as most of these families. They are on call 24 hours a day, seven days a week. They support local area needs, they contribute to the financial well-being of the area, they support in force during San Pedro cleanup days and other volunteer days like the one about the church that was painted. The Air Force Space Division families needs affordable housing in the Los Angeles area. The White Point area should be a high candidate for the Air Force housing.

Multiple homes on a single site should reduce the cost to the taxpayer by reducing the operating costs and maintenance costs. Bogdanovich Park has been built, with the addition of the soccer field and baseball diamond, at a reported cost of $500,000. I have heard as high as $700,000. And this was paid for by the San Pedro taxpayers. It doesn't

make sense to me to throw those away by destroying those fields and then spending a similar amount or a greater amount to replace those fields. The cost will be paid for by the taxpayers, whether it's city or federally funded.

And then there was another point brought out tonight that if Bogdanovich Park is used for housing, the city would have to pay $816,000 back to the state. That would be in addition to the cost. The kids need fields. What would they do if the field were destroyed? Does anybody here have a suitable alternative location for soccer fields and baseball fields for the kids? And if Bogdanovich Park is used for housing, how will the San Pedro youth community feel about giving up a park named and dedicated to one of their citizens? And how many of you in attendance have a large equity in your home as a result of having purchased it during high inflation times. The Air Force families will not likely get housing because of this inflation. They are required to move or relocate to new or usually distant sites every three or four years, sometimes less, so they don't accumulate these large home equities. So let's be fair and allow our local Air Force families to live at White Point housing. Thank you.

COL. SWEENEY: Next we will hear from Mr. Lloyd Karsh from the Harbor Peace Committee.

MR. KARSH: I was interested in the fact that you spent four months repairing the DEIS -- or the EIS. Also, you allowed yourself four months to prepare the thing and two and a half weeks for people to respond, in terms of this

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hearing, and another four and a half weeks for the final written responses. So the public gets shortchanged all the way.

I was also interested in the fact that when you mentioned what you call your scoping hearing, then you really didn't get the sense of what happened at these hearings. In the first place, on the hearing on the state park the majority of the audience was -- the majority of the people who live in this town were in favor of the state park. At the hearing that you held on December 11th the majority of the people in the audience were not in favor of that housing, and nowhere is that reflected in this EIS. It's like people are irrelevant.

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I'm interested in the sense that when you go over what will be the impact to San Pedro in the flora, fauna, water table change, plan use compatibility, loss of open space and increased traffic, historical and archeological value and statistics, that you are putting housing in White Point. All of these things are impacted, at least to a moderate or to a high degree. It says so in your very own report. So you are willing to place housing in White Point. That you are willing to admit, that will destroy for all practical purposes the chance to have one last natural area on this coast that we can pass down to the generations.

I'm interested in the fact that all the trade-offs, the impact on the natural area of White Point, the artists, the cultural center at Angels Gate or Bogdanovich Park, it's a no win situation for the people of San Pedro.

I was also interested in the development of the studies the Air Force used to relate to the development of this housing need. As far as I can tell, it wasn't until the 1984 Bellinger & Associates study in 1984 was the question of Air Force access to White Point or anywhere in San Pedro specifically addressed, wherein you admit in the early 1970s the city was definitely interested in the park. And in 1975 you weren't through the process of filing for the land use plans, a plan called for White Point to be donated for recreational use, a recreational park for both passive and active recreational facilities. And that has been stopped because of a lack of funds, in fact, playing it off against the factors of the military. It's all been blown out in space.

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The other thing that is going on, the Viet Nam war housing went up and we had a round of inflation that just about bankrupted the country, and now we are going down the same path all over again, in addition to a passive public, arming the heavens, which I don't think will benefit anybody. But I say it's important to be here because, you know, for your key commission impact factors such as synergism and corporation industries. This is why you want to be here, so you can be close to all the toys. However, from a security point of view, national and an Air Force security point of view, I think it is really out of the question putting all of your brass within what, two miles of each other? It seems like a stupid decision even from a security standpoint.

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I was also disturbed at the impact study that

you had no feeling in reading this impact study. Somebody in North Carolina would look at the study and say what is going on here with this at White Point. They would not have any sense of either a massive community opposition, they would not have any record of what has been said at these hearings, or letters to the Air Force, they would not have any sense of the fact that this meeting is obviously packed tonight by people who have resisted this thing going through. And there is a hell of a lot of brass here tonight. You know, it's all manipulative. It's very manipulative. It's insulting. The question of the park is vaguely addressed on what I call page 86, which you call 3-8. There is finally a paragraph that indicates that oh, yes, there is a park at White Point. And you conclude that the ability of funds and transfer of funds for the park would depend on the resolution of the housing issue. You have already decided how it's going to be resolved, you know. There is just a certain lack of respect for the people in this town embodied in the way that you approach this subject.

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Nowhere do I see -- we agree on one thing. We agree on the dangers of the Seal Beach Naval Weapons Station. For years the people ran into a snag to get nuclear weapons out of Seal Beach, and your Environmental Impact Statement mentions Seal Beach as a site definitely poses a very hazardous site for Air Force personnel.

You mention that it's also hazardous to have housing along the side of the refinery because of noxious fumes. And it is the last open space on the coast of

California. You complain about the cost of housing on the military budget has put pressure on the national economy. There hasn't been a massive amount of low income houses built since the 1950s, and that was only built to satisfy the demands of the GI. That was a war against facism, before we brought over a thousand Nazi rocket engineers to develop our space program, which is now Star Wars.

We are putting ourselves all at risk with nuclear technology. It's like you want to be part of the community but you hide yourself out behind gates and security systems. And that doesn't really feel like part of the community. And the neighborhood kids can't walk down your streets. You don't mention any of this, if there would be public access to any of the housing that you propose to build. I don't want, you know, to be living in a world where people are putting out their best efforts working on a global genocide machine. And now we are turning the whole earth into a god-damn machine. It's not fair to you, it's not fair to the people, it's not fair to our children's children's children. And you burn the earth up. You know, you got the technology to do it, as we all know; you work on it everyday. And somewhere it's got to stop.

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COL. SWEENEY: Mr. Karsh, you need to sum up, please.

MR. KARSH: I would just like to see people understand that we live on one earth, that the weapons that we have are beyond our means, that the amount of our needs do not justify having these weapons, that at any moment, you know, computer error we can be dealing with a wall-to-wall fire storm.

Something like that could be the beginning of the end, I don't know. Thank you.

COL. RODGERS: I would just like to say, Mr. Karsh, that while I don't agree with anything you had to say, those of us that represent those in the auditorium tonight in civilian clothes are deeply committed to defending your right to say such things in an open forum.

Secondly, I would like to say that, while you made many attacks on the Environmental Impact Statement, there was very little detailed remarks that we could actually tie to the document. If you have specific comments that you think there are inaccuracies in the document or can offer substantive reference material to discount anything in the document, we would be glad to consider it.

COL. SWEENEY: Our next speaker is Mr. James Allen representing the community newspaper.

MR. ALLEN: Well, basically I have just a few questions to ask and I don't want to make any long, drawn-out statement tonight. I think everybody is pretty tired of staying here. But basically, we need to know a few things. One, is the Air Force willing to coexist on a negotiated piece of land at White Point with the state park. Two, is the Air Force willing to give the city or the state a nonreversionary guarantee on whatever property is left after the Air Force has built whatever housing they decide to build on either of the three sites; and thirdly, will the Air Force enter into serious negotiations in which they will involve the city, the state, themselves and the community representatives

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that have come here today to come to negotiated settlement of this that is fair to all parties involved.

Now, one thing I will add, that is, I was at a meeting of the Chamber of Commerce some months ago where the general of the Air Force showed up and Congresswoman Joan Flores was there, and after a long series of discussions between the two sides, it became very apparent that the bottom line was that the Air Force only -- their bottom line was that they needed 16 acres of White Point for Air Force housing and that the city was only willing to give nine acres. And I said to the general at that point, well, we are all business people here, and generally in any kind of business negotiation you don't get everything you want. Wouldn't it be best if we were to compromise on the remaining, what is it, seven acres? And the general absolutely said no.

Now, it's my feeling that if the Air Force were to give up three and a half acres and the city were to give up three and a half acres, they would probably have a deal here and we could all probably go home early tonight. But I don't feel like there is anybody on the Air Force side that is willing to give in. That's the impression that we get in the community, that these are the options you are willing to give us, period.

Now, I would like to hear some response to the first three questions and see whether or not there -- really what the position is on the Air Force side.

COL. RODGERS: Okay, I will take them one at a time. First, on the coexistence with the state park. I said in

my opening remarks, and I will say it again, that the Air Force believes that a park on White Point along with the state beach there and belonging to the county is indeed a viable park solution. We don't see that as a mutually exclusive arrangement at all.

Secondly, the Air Force's willingness to give up a reversionary interest on the remainder of White Point. I said this earlier in the evening, though I'll repeat myself, that in the last negotiating position from Secretary Boatwright from the Air Force, the agreement was made to seek removal of the reversionary clause from the remainder of White Point, along with several other conditions that called for the 16 acres of White Point along with Bogdanovich Park. I think I can say unequivocably that the Air Force has been involved and continues to be interested in serious negotiations with the city of Los Angeles.

MR. ALLEN: Would they accept 12-1/2 acres at White Point and a reversionary -- a no reversionary guarantee and put it in writing?

COL. RODGERS: It's inappropriate for me tonight here to say what the Air Force would or wouldn't accept.

MR. ALLEN: Who would it be appropriate to receive that information from?

COL. RODGERS: Well, we have ongoing negotiations, more extended negotiations with the city of Los Angeles scheduled. And let me say, though, that if there are other -- it is not simply splitting the difference between 16, there is the business of relocating the ballfields, which we have

heard a great deal about tonight. The city has offered up Bogdanovich Park, but they have said oh, by the way, there is some ballfield that needs to be relocated.

The problem of relocating the ballfield is quite a big one and very central to the issue of Bogdanovich Park. So all I can tell you right now is that negotiations are scheduled to continue, and the Air Force is willing to sit down with the city.

COL. SWEENEY: Mr. Allen, do you have any further comments? If not, I have to ask you to reserve your questions to the end of the hearing, should we have any questioning time remaining.

MR. ALLEN: One remaining comment would be that my feeling is that all parties concerned, and that includes the community groups that are here tonight, state park officials, city and Air Force, should all sit down and hammer out, I think, in sincere negotiation a final agreement that everyone can live with, and I think there is room here to come up with a viable solution that will save the soccer fields, that will give housing and it will give the community a very needed necessary state park. Thank you.

COL. SWEENEY: Thank you very much.

Our next speaker will be Mr. Art Mackey speaking for himself.

MR. MACKEY: Thank you very much. It's an advantage to speak this late in the evening, or this late in the proceedings, in that you cannot avoid becoming better educated; you cannot avoid feeling the pressure with which

the speakers have spoken and the sincerity with which they have spoken and the interest that they each had, as we all have our own. It's a pleasure for me to be here. It sounds to me like this is an Air Force versus a park issue. But that's not how I see it.

I think we ought to concentrate back on the impact statement. What I see in the impact statement, one of the significant items omitted, and that's the environment of the quality of the people involved and the quality of the community that has been brought here by the already existing Air Force people. In the community we have 500 already-built homes and more in which they live in the community aside from Fort MacArthur. We are talking about 170 more families contributing decent, high quality, disciplined, friendly, good neighbors. That's not a park issue; that's a people issue. You should not worry about the tidelands or the number of units. We should worry about the quality of people, because what will make this country move forward is the quality of people. I would simply like to recommend then that in the final document leading to that publication that there be this interaction with the city government and state parks and the folks here for the purpose of expanding some of the concerns we have heard about the children playing soccer and those concerns of the audience and expand to the point where they are addressed prior to being written down in some form, to discuss them thoroughly. And I thank you for your time.

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COL. SWEENEY: Thank you, sir.

Next we'll hear from Ms. Goldie Otters representing herself.

MS. OTTERS: I am Goldie Otters. I live in San Pedro. About 14 years ago in this same auditorium, a public hearing was held by the Navy proposing enlisted men's housing at White Point. Nine hearings have been held since that regarding military housing on White Point, all demonstrating overwhelming public opposition. At the same time -- about the same time Prop 20, an initiative demanded by the people, was approved to preserve remaining coastal land for the enjoyment of all the people, not just those lucky or rich enough to live on it.

The coast is California's most valuable resource, and White Point is a perfect example of that treasure. Last year the Coastal Commission not only unanimously denied the Air Force proposal, but the Commissioners stated, and I quote, I think the Air Force has been talking from prepared statements but not listening. I cannot support their position. The EIS bears that out. And I quote from a Peninsula news editorial, and I'm quoting selectively. The EIS shows clearly that, while the Air Force is asking for local public comment on its housing plans, it is not really listening to what is being said.

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At a scoping session more than two dozen people told the Air Force planners that White Point should become a state park. The EIS only chose to list the number of speakers to address various general topics. Will the Air Force only choose to downplay again the community sentiments

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against the loss of a state park option? Regarding page 3-4 of the EI Statement, if the Air Force no longer requires the housing, the structures and roads theoretically could be removed and the land returned to its existing seminatural open space site. Abandoned military housing is required to be first offered as low income housing. San Pedro, Wilmington and Long Beach have had long experience with that event.

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The EIS, page 1-6, also informs us that the average allowance for all field grade and senior officers is approximately a thousand dollars a month, and indicates that this is a hardship. A news article regarding the ceremony for an Air Force colonel, who retired last week, mentions that he lives in Palos Verdes Estates. As the highest priced housing in California, that would seem to be suitable quarters.

In the summary of the EIS, the proposed action is that the housing proposed at White Point also includes several acres designed for open space and recreational use, tennis courts, basketball courts and so forth, as well as landscaping to enhance the visual quality of the development.

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When was the last time the public was ever invited to use the tennis courts or swimming pools of Fort MacArthur, or what is now the upper reservation.

Your plan is excellent for the Air Force, not the public who pays for it and is fenced out. On the contrary, the military may enjoy all of the amenities of a White Point state park. A state park is a family park. Anyone uses them. Everyone knows that, believe it or not,

there is life after soccer. Many of your organizations supporting the state park expects to have programs especially for children. I think that's all I have to say. It's a long evening. Thank you.

COL. SWEENEY: Thank you.

Next we will hear from Mr. John Kopezak representing himself as a South Shores homeowner.

MR. KOPEZAK: John Kopezak of San Pedro. And I want to thank you gentlemen for giving me this opportunity.

As a South Shores homeowner of over 22 years, I want to repeat my previous desire that the Air Force be permitted to build their 170 housing units on 40 acres at White Point. Nothing in the environmental analysis has a sufficient reason to even argue about it. For eight years, since 1978, the Air Force has repeatedly tried to get this site, and it's about time they started to build.

The Environmental Impact Analysis process is a bureaucratic monstrosity that I as a taxpayer resent. I see in last night's paper that we had another gang fight at Royal Palms. The less park we have the less area for gangsters to perform their atrocities. Let's give the Air Force what they badly need: Housing now.

We have 13 parks in San Pedro, and White Point is a park that will only make it like Disneyland with gridlock and without protection from the gang violence.

A correction on some of this last stuff. The last useful area left on our coastal area. The coastal areas from Cabrillo Beach out to Point Fermin is all open; from

White Point up to Redondo Beach is all open.

World conditions call for more Air Force birds, and I welcome the Air Force to White Point for my future safety. Thank you.

COL. SWEENEY: Next we will hear from Mr. Ronnie Lindquist representing himself.

MR. LINDQUIST: I am Ronnie Lindquist. I'm a taxpayer and a resident of the city of Los Angeles, and I intend to cut through some of this syrup. I don't like the waste of tax dollars. I strongly support the eyeball-to-eyeball type negotiations between state, city, county and federal officials to determine and carry out the logical plan previously suggested, that both the Air Force and the city and everyone can have a real park and build housing in the San Pedro area. But enough of the heel-dragging, enough with letters back and forth, enough of dreams about parks. It's time to do something.

The longer the city, state, county officials drag their heels with their insincere nonsense, the more of our tax dollars are eroded by inflation and environmental studies. The land at White Point is in a residential area and it belongs to the federal government. The fact that it was loaned to the city of Los Angeles on which to build the park is irrelevant, since the transfer document clearly states that the federal government can reestablish its fee simple title to the land at any time for national defense purposes, even if the city had in fact fulfilled the primary condition of the loan, which was to build a park within five

years. That's back around '84, '83, depending on how you count.

Now, it doesn't say anything about planning the park or having a meeting about a park or supporting a park or dreaming about a park. It said the city had to build a park, and it hasn't. Now, even if the city had built a park, the federal government could still do what it wants for national defense purposes. That's what the deed says and that's what we as citizens of the city of Los Angeles agreed to. Now, the people who want to say building residences is not a national defense have to forget that. They are not the people in charge with the responsibility or authority for determining what are and what are not national defense needs. That is the job of congress and the president. And those two entities have determined that the building of these residences is a national defense need. Over $12 million of national defense money has been appropriated to build 170 houses on this federally owned land and it is defined as a national defense need. The same group of people may want to disagree with congress, and they can do that, but that has to be done in Washington if you want to get congress to deobligate funds. But to try to do it with statements of the impact to the environment or building residences in a residential area is just a waste of tax dollars. Now, as an American I think we have the right to build a residence on our property in a residential area. At least I thought we had that right until I discovered what was going on down here. I think that everybody here has a right to build the

homes that already exist in San Pedro.

How is it that the last ones in always seem to think that they have the right to say that nobody else has the right to do that. They have appropriately sold the land on which they are built down here, and if anyone told them that no one was ever going to build houses on White Point, you ought to go down and sue them because they lied to you. We are Americans; we have the right to build houses on our property, and that's exactly what is going to happen. Which brings me to my last point.

I am vehemently opposed to taking this nonsensical issue to court as a capricious waste of tax dollars. It's a double waste of tax dollars, because it would be wasting our tax dollars to fight the federal government or the federal tax dollars to pay lawyers to play that well-known games of lawyers and judges, when the bottom line is clearly known, and that is, that we are going to have 170 houses built on federal government land owned by the federal government.

In closing, I would just like to make one point: In an area where the population of eight to 10 million people -- it's incredible. I mean, that any one group of Americans that think they have the right to tell another group of Americans that they can't build houses on their own land just because it's got a real nice view of the ocean, and if anyone here wants to tell me that that's not the issue, I don't think anyone with any sense will believe it.

COL. SWEENEY: Thank you, Mr. Lindquist.

Next we will hear from Mr. Dick Anderson representing himself and his family.

MR. ANDERSON: I didn't show up tonight with a lot of preparation. I guess I got angry at the first part of the meeting, but I knew there was something about the last two gentlemen I liked. I wanted to say to the Air Force you are the only peace workers in the world, and I appreciate it. I, too, am just a little ashamed tonight. There was an assemblyman here. Is he still here? Oh, he scurried out as soon as he got his say in. At first I thought he was going to say something constructive, and I listened to his points and everything, and then he made the last remark: He said the militarization of San Pedro, and that's when I got mad. And then most of the group that I'm addressing has already left tonight, so I'm sorry that they are not here. But for those that clapped, and they said because all these guys were here, actually, it just griped me. And I thought about last week and two of your brothers died and I got mad.

Tonight we heard from -- listen to this -- we heard tonight from, what was it, the Human Relations Commission, the Sierra Club, the Audubon, the Native Plant Life Organization, the League of Women Voters, All My Relations, All Life Relations, the Harbor Area Peace Commission -- listen --

COL. SWEENEY: Let me interrupt you if I could, please. I am asking you to please address your comments to the Draft Environmental Statement and defer from attacking any of the other speakers. They gave you the opportunity to speak.

MR. ANDERSON: I apologize. But I support the 170

units, and I want the Air Force as my neighbors. My family wants them as neighbors. We don't want a state park here. We don't want a state park here. We want the Air Force. That's exactly where it is. And believe me, you do have support other than these groups, the South Shore Homeowners Association, of which I am no longer a member of as of tonight. We support you and our neighbors support you, and that's it.

COL. SWEENEY: Thank you very much. We still have a few speakers, so we are going to go a little beyond the cutoff time of ten o'clock. But I believe that all of those that have asked for an opportunity to be heard will be heard within the next half an hour or so.

Next we will hear from Edward Buchanan representing himself.

MR. BUCHANAN: Good evening. I listened with great interest from a lot of special interest groups, and I represent a special interest group: Myself. I live in South Shores. I have lived there for 25-1/2 years. I raised five children in this area, and I feel this area is a wholesome congenial neighborhood. I was successful in getting all of my children to universities. Two are lawyers, one is an accountant. Not bad for a small town San Pedro.

It's a great place to live, and I think we ought to share it with the people in the Air Force. Clearly, in my mind the issue about Bogdanovich Park should not even be raised. It boils down to one of two things: We build 170 units for the Air Force on Option A of that park or

reserve it for state park. I for one as an individual who lives in the neighborhood would not like to see a state park developed there. And I will be honest with you, it's a very special interest. I wouldn't like to see 300 to 400,000 visitors a year coming down into my neighborhood with the increase in traffic, which I will assure you will happen if we go the state park route.

On the other hand, if we let the Air Force live there, I know what kind of people will come and live in those homes. They are intelligent, college graduates, they are dedicated, they are professional. And I guarantee you they will add more to our community than they will take out. And that's my view. Thank you very much.

COL. SWEENEY: Next we hear from Mrs. Grace Hoxworth.

MS. HOXWORTH: Ladies and gentlemen and members of the Air Force, as a member of Mayor Bradley's original committee to decide the use and development of the access land for Fort MacArthur and its properties, I find it a little hard to accept the incessant bantering by the Air Force over the property. We all respect the Air Force. We want you. It is not a military question.

In the interest of public health and safety we, too, did a geological survey of the land and found formations not conducive and density and mass wastes. Your

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studies show evidence of this same finding. We found it necessary to declare these properties as agricultural lands to abate the onslaught of developers. You won't build on the natural contour of the land and you will destroy it by

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grading. This is a common way of building today.

We have the so-called Sunken City at Point Fermin because of this same geological strata. We have Portuguese Bend of the same makeup.

Forty-five years ago we were told by engineers, with the development of Hawthorne and Crenshaw, when they reached Crenshaw that if there was any further development south of that area we would have slippage. We have Portuguese Bend. Friendship Park is not on military land. We have to declare it agricultural, and also declared a county regional park because the land would not support regular watering and weight density of buildings.

We have never wanted housing in the area of the White Point land. The Air Force is not satisfied with the perimeter. No, it has to have the middle of the pot. We are not against the military, least of all the Air Force. We just don't want housing in this prime historical property. It was originally designated as an historical military passive recreational park to preserve it for our grandchildren and for posterity. And environmentally this land is smack-dab in the path of the migratory flight for birds. A great variety are to be found at Point Fermin and the so-called Sunken City. The reason there are none at White Point now is because of the lack of trees there.

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I'm not that far from this area, being in the 1200 block on 26th Street. I have feeders, I water and I have all kinds of wild birds there, including tanagers, orioles, blue jays. And I welcome them. I also welcome

the Air Force, but not at White Point. Thank you.

COL. RODGERS: I would like to make one comment. We have done quite extensive soils investigations as part of this project, and all of the reports we have show that all the sites are suitable.

COL. SWEENEY: We have just seven further individuals who had asked to speak this evening.

Next will be Donna DiRocco speaking for herself.

MS. DI ROCCO: Thanks. My name is Donna DiRocco, and I was born and raised in San Pedro. I am an environmental specialist by profession, and my comments are directed to the Draft Environmental Impact Statement.

First of all, I did some simple mathematics and I found that 170 homes divided by 40 acres comes to .25 homes per acres, or a quarter of an acre for each house. And I was wondering if that is a requirement that each house has to have a quarter of an acre lot, or did I do my math wrong?

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Another idea that came to mind today, I was wondering if the Draft Environmental Impact Statement took into account today's interest rates that are falling with home mortgage payments and that houses are becoming much more affordable for people, especially the first-time buyers, like maybe myself some day. I think that should be of interest.

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On page 3.37, the section on air quality impasse. You should quantify those impacts rather than just generally brushing over the impasse.

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Page 3.39 discusses very vaguely runoff volumes. That should be quantified.

On Page 3.45 you discuss localized transportation impacts, but you do not address any impacts on the

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Harbor Freeway or the San Diego Freeway going down to the Space Division. I think that needs to be looked at.

Page 4.10 you tell us that if we want to look at more details on the geotechnical investigation that we should get a copy of the Woodward Clyde Report. I was

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wondering if you could just summarize what that investigation points out, if you could summarize that. You don't have to put the whole thing in, but maybe just a summary of the geotechnical.

Also on page 4.13 you say that the soils on the site are expansive. I'm not really sure if that will

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affect the stability of housing development on the site. So hope you will further address that.

Also page 4.9 you discuss the traffic study

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but you don't discuss what days the traffic study was performed or the hours and if it was at peak hours or not.

Finally, I didn't get a chance to review the entire EIS. I got it late last week, so when I finish reviewing it I will be providing further comments. Thank you.

COL. SWEENEY: Thank you very much.

COL. RODGERS: I would just like to say on the Woodward Clyde Report, the size of that document is about two volumes two and a half inches thick each. I would be happy to make a full report available for reading in our offices, and we can

probably provide a brief summary in the final report.

COL. SWEENEY: The next speaker will be Mr. or Mrs. R.A. Artunian representing themselves.

MR. ARTUNIAN: I am a 20-year resident of the quiet, clean community of South Shores. I would really like to keep it that way, therefore, I would like to express my strong desire against a large state park that could attract over 300,000 people per year into it, mostly transient and coming in vans, campers as well as cars. Just think about it. Most of those people that will be coming will be coming during the summer months. So I just am asking you to ask yourselves, can Western Avenue and Paseo Del Mar handle that kind of traffic? You know, I quit the freeway going to work bumper to bumper. I would hate like heck to take an hour to go one mile to Ole's to buy a two dollar hammer.

But seriously, the traffic, the transient nature would in turn lose the atmosphere we have all been used to and like so well. So why don't we go ahead and get something that will maintain the atmosphere we are used to and that we can handle. We just can't handle the other situation. Thank you.

COL. SWEENEY: Next we will hear from Mr. Tony Bernard representing himself.

A VOICE IN THE AUDIENCE: He left.

COL. SWEENEY: Okay. We will move on then to Mr. John Baberi.

MR. BARBERI: Thank you. I have prepared a detailed statement which I have mailed to your office. I will be

very brief in my remarks. I am here tonight as a private citizen of San Pedro. I was born and raised in this community and attended public schools here. My parents, my family have lived in the community for nearly a century, so of course reading the document and looking academically in the future of the community and of course the future of White Point, I have reviewed the Draft Environmental Impact Statement dated April 1986 and, as a matter of act, I have reviewed many of these in the course of my own business here in San Pedro. I find that typically the beauty is in the eyes of the preparer, so I won't really go out on the specifics that are covered in the statement, but I will echo some of the sentiments expressed earlier in the evening by Assemblyman Elder, representatives of the AYSO organization and others.

In my view, many of the alternatives present in the Draft EIS is unacceptable, inasmuch as they destroy Bogdanovich Park which is a very heavily utilized recreational athletic facility for the community. I also dismiss a couple of the other alternatives. But the only one which I am unwilling to sacrifice is the Angels Gate Cultural Center. So if those alternatives were removed, I have no problems at all in supporting the alternatives to develop 40 acres of White Point for Air Force housing.

The Air Force has become somewhat of a cottage industry to the city of San Pedro. I have no apologies for that. I think they enrich the community. Whether we like it or not, the civilian space program is inextricably tied to the military space program, and the future is in outer

space.

Earlier this evening we heard a -- well, we heard numerous proposals for state parks. I want to express that for a peace park or a peace monument, and I would only say that for those of you that are so inclined to visit a peace monument, you should take the time to visit the Arlington Cemetery, the people that provided the people, and those are Air Force people and the other brothers and sisters in the armed services that maintain the peace.

COL. SWEENEY: Thank you.

Mr. George Williams of San Pedro representing himself.

MR. WILLIAMS: Thank you. I am a resident of San Pedro for two years, and I own property here. I am a member of a homeowners association and an officer in the association. But I'm really talking for myself about this thing here tonight. I am a retired Air Force officer, and I have lived in a lot of communities. I hear a lot of feeling in this room that I think, however this issue is resolved, should be spoken to. This isn't a people-to-people issue. Really, San Pedro needs the Air Force as much as the Air Force needs that housing.

I have lived here two years, and I really worry where my tax dollars are going and whether they are going up or down. We had a break in our communication with the local people. The police in the Harbor Station came over and they complained that they lost 18 patrolmen who were taken out of town. So we had to start a letter drive

to Ms. Flores to get them back. Which we did.

Now, when I was in the Air Force, in the community where I lived we got involved. And I promise those of you that are still here as the residents of San Pedro that that is the quality of the new neighbors that you will be gaining, so that can help you in your fight to get San Pedro taken care of and to get the use of your tax dollars here.

In addition, I don't know if this has been brought up or not, but the military, when they live in a community and their children use the community for sales there is something called (inaudible) dollars that are tied to that community. Now, if you don't get organized, and I'm sure with the Air Force neighbors you will get organized, those dollars will go uptown, too. That's all I have.

COL. SWEENEY: Thank you.

Next we will hear from Mrs. Lois LaLouie.

MR. LA LOUIE: My name is Lois LàLouie. Did I understand you to say that we could not ask questions at this point?

COL. SWEENEY: No, you may ask questions, but we prefer you to make your comments and then ask your questions at the end of your comments, return to your seat, and then Col. Rodgers will attempt to answer your questions.

MS. LA LOUIE: Thank you. My training is in the history of art and architecture. I have taught at the college level from prehistoric times to the present day; therefore, I am interested in this EIS for several points of view.

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First of all, I read the advertisement in the classified section in the newspaper inviting me to go to the local library and read this. I went to the San Pedro Library but the librarians couldn't find it. I was able to get the 1984 copy, and they let me take it out last night to look at it. Like other people who spoke tonight, I did not have time to study it entirely, but in certain areas I found questions.

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For example, when you refer to Paseo Del Mar as being a four-lane road below the White Point area, I experience it as a two-lane road.

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And I can find no reference here to what one speaker told you, I think it was an earthquake down below White Point, is not mentioned in here. I agree with the people who said that you have not given enough attention to what the people of the area say.

But you do in this 1984 edition include as an aftermath four pages from the San Pedro Chamber of Commerce. I would suggest that many of the realtors in the area belong to the San Pedro Peninsula Chamber of Commerce, and they might accept Col. Rodgers' challenge to find the Air Force some other place for its housing. I think Jacob Gutierrez was right when he picketed the original housing at Fort MacArthur, because from the point of view of architecture I find it disappointing. I suspect that if the Air Force is successful in placing 170 homes at White Point it, too,

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will be in the tradition of the architecture produced by the federal government: Totally disappointing.

When I came in here tonight I felt much like the Arab who had a camel in the desert and he had a tent, and when the camel put his nose in the tent in the middle of the night and asked if it could please get a little water there, the Arab agreed, and a few hours later woke up to find out that the camel had its shoulders in the tent, and then the story goes on in the morning, the Arab woke up to find out that he was out in the desert and that the camel was in the tent.

The Air Force has come to San Pedro and has taken over Fort MacArthur, and Gutierrez was unsuccessful in stopping you. I don't live in San Pedro. I work in San Pedro. I know San Pedro and I love San Pedro, and the people who have spoken here this evening against the Air Force housing at White Point are some of the finest people in the entire world. And I know people all over the world. When they speak, I listen to them.

I have gained a distinctive impression this evening watching the Air Force in action that they have forgotten that in this great country, which is governed by the people, I ask them to listen to the people. They have not done so in this DEIS, and I think it's time that they did listen.

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COL. SWEENEY: Thank you very much.

COL. RODGERS: I would just like to make one comment, and that is -- really, two comments.

First of all, we would be very happy to supply you with a copy of the current Environmental Impact Statement.

If you would see us after the meeting or if you put your name on the mailing list we can get one to you. We would like to make a further comment before the end. Secondly, the matter of our disappointing house architecture. Housing is really my responsibility as the chief of acquisition of civil engineering to provide the best possible family housing that we can for the dollar. And I'm sure you can appreciate that congress doesn't give us extra funds to provide many of the architectural touches which we would probably all like to have in our homes. What they are after is the minimum amount of dollars that they can depart with and to provide shelter. Still in all, we take a great deal of pride in civil engineering in providing the best possible facilities we can. We recently built at the Los Angeles Air Force Station a couple of design awards out there. I would like to see the family housing that we build in the San Pedro area to be design-winning housing and do everything I can to make that happen.

COL. SWEENEY: Thank you, Col. Rodgers.

Our last speaker is Mrs. McCauley, who would prefer to make her comments from her seat; is that correct?

MRS. MC CAULEY: Yes. I am a resident of San Pedro and highly incensed at the attitude I have seen, like our community is a community of loaners and residents.

My husband served very honorably in the military for 20 years. My son served his country, my brother, my father, and so on and so on. They as well as I feel for all of our taxpayers, feel like their money is wasted. None

of us do. But as the man said, God bless them for ten dollars. You know, not only do I not want to see Bogdanovich Park lost because of the significant value to our community and to our children, but we have to serve each other. We have to be a part of the community. We can't just ignore each other and not let them in our backyards and think maybe they will just go away. They are not going to go away. We need them. So we only need them when somebody is shooting at us, right? No one wants to stand up and take the flag for someone else. I am proud to be the wife of a retired Air Force gentleman, and I would like to see all of you as my neighbors.

COL. SWEENEY: I believe I overlooked one person who had requested to make a statement, Mr. Turnquist.

MR. TURNQUIST: I would like to take you back to 1929 when I first enlisted in the Navy. Coming out here, I married a local girl, and when she tried to find a place to live, landlords were against the military. And it still persists today. They are reluctant to rent to us. If they do they raise the rent. In those days you could rent a house, you could rent like $45 and you paid every two weeks and they were furnished. I would like to say that the Chamber of Commerce previously accepted the Air Force and then they changed their minds later on. Fort MacArthur is better than some homes across the street. I know there is reserve people in this audience tonight that attend drills and they are against it. I was a sailor when I came out here and I would like to ask you if one of your sons or

daughters were in the military what would you do? I suggest to the Air Force not to change their plans and go for all the land between Gaffey and Western and also between Paseo Del Mar and Western Avenue.

In closing I would like to point out that my wife heard from a former classmate here in San Pedro, who was a dentist here in town who made the remark a few weeks ago, "You married a sailor." Well, I would like to say that I am a former sailor and I have served over 31 years in the Navy and I retired as a full commander and I live here in the South Shores. That's all I have to say.

COL. SWEENEY: Unfortunately, there is no further time remaining and we must conclude these proceedings at this time out of respect to our agreement with those that graciously loaned us this facility. Please remember that you have until the 27th of May, 1986 to submit written materials to be included in the transcript of this hearing, and those written statements will be fully considered and addressed in the final Environmental Impact Statement. Once again, oral and written statements or comments will be afforded equal weight.

Offically, the Air Force appreciates your efforts to come out tonight and contribute your views to this public hearing, and speaking on behalf of all of the members of this Air Force team, we thank you for your courteous attention and adherence to the rules of this hearing throughout this evening. I believe it's not too presumptuous to say that each of us who have been here

throughout the evening has learned a lot and has learned a greater appreciation of the other. I have been assured by Col. Rodgers that he and his Air Force team will remain at the table for a short period of time to informally answer any further questions that might be remaining.

(The public hearing is adjourned.)

STATE OF CALIFORNIA)
)ss.
COUNTY OF LOS ANGELES)

I, NORMAN E. HARVEY, CSR #3533, a Notary Public in and for the County of Los Angeles and State of California, do hereby certify:

That the said TRANSCRIPT OF PROCEEDINGS was taken before me at the time and place therein set forth and was taken down by me in shorthand and thereafter transcribed into transcript form under my direction and supervision, and I hereby certify the foregoing is a full, and true and correct transcript of my shorthand notes so taken.

I FURTHER CERTIFY that I am neither counsel for nor related to any party to said action nor in anywise interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal this 5th day of May, 1986.

Norman E. Harvey
Notary Public in and for the County of Los Angeles, State of California

OFFICIAL SEAL
NORMAN E. HARVEY
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires Jan. 15, 1987

3.0 RESPONSES TO PUBLIC COMMENTS

In accordance with CEQ regulations, the U.S. Air Force (USAF) is required to assess and consider comments on the DEIS (40 CFR 1503.4). This section provides responses to public and agency comments received on the DEIS. Responses are provided to the written comments received through June 2, 1986 (Section 1.0) and verbal comments made at the public hearing (Section 2.0). The responses in this section are keyed by number to the comments identified in Sections 1.0 and 2.0.

1. Consultation with the California State Office of Historic Preservation

The National Environmental Policy Act (NEPA) process assists public officials in making a decision on the final site selection (i.e., the Proposed Action or Alternatives A through H). The final site selection, therefore, does not occur until the EIS process is complete, including publication of the DEIS, the FEIS, and the Record of Decision. As indicated in Sections 4.14 and 5.14 of the DEIS, the Proposed Action and each of the alternatives being considered contain historical and/or archaeological sites that are potentially eligible for inclusion on the National Register of Historical Places. Once the final site is selected, the USAF will consult with the California State Office of Historic Preservation and the Advisory Council on Historic Preservation to, first, determine the eligibility of the site and, second, to develop an appropriate mitigation plan to minimize adverse impacts on historic/archaeologic sites determined to be eligible for inclusion on the National Register. Section 6.14 of the DEIS briefly summarizes potential mitigative measures. This consultation will be made as outlined in 36 CFR 800.6. The Advisory Council on Historic Preservation also has received the DEIS (see letter dated May 12, 1986, in Section 1.0 of this FEIS).

2. Request for Copy of WESTEC's Final Archaeological Survey

The draft Historical/Archaeological survey report submitted by WESTEC is under review by the U.S. Army Corps of Engineers. Upon completion of this review, a final report will be prepared. The final report will be

provided to the National Park Service, California State Historical Preservation Office, the Advisory Council on Historical Preservation, and the Division of National Register Programs, U.S. Department of Interior, Western Region. The reports are for official use only to protect potentially eligible historical/ archaeological sites from destruction by amateur artifact collectors.

3. Relocation of Bogdanovich Park (BP) Soccer Field and Baseball Diamond

As discussed in Section 5.11 of the DEIS, the soccer/football field and the baseball field at BP would be displaced by alternatives involving BP (Alternatives B, C, D, and H). Organizations that currently utilize these fields, including the American Youth Soccer Organization (AYSO) and Mary Star of the Seas High School, would be forced to use facilities at other locations. Although there are two other baseball/softball fields nearby on Paseo del Mar, they are in poor condition. There are no other public soccer fields in the southern San Pedro area. The Daniels Field Sport Center (13th Street) has a soccer field, and football fields at Peck Park and Recreation Center and the San Pedro Park and Recreation Center have been utilized for soccer. Although these facilities exist, the City of Los Angeles Parks and Recreation Department states that demand for these fields is extremely high, and that the fields are heavily utilized by many groups for both football and soccer.

The city has stated that it expects the USAF to construct replacement facilities but has not offered a site. The USAF has indicated that it will contribute to the cost of replacement fields on land provided by the city, provided there are sufficient funds remaining after the contracts for construction are let and the construction cost of the housing to the government is reasonably fixed. No funds for replacement fields are included in the project budget, because no funds were needed for the White Point (WP) site originally planned. BP was not originally considered for this

project precisely because, unlike WP, it had had been developed and was in use. The alternatives evaluation criteria (Section 3.2 in the DEIS) included the provision (Item No. 4) that the candidate site is not already committed to other uses. BP and the Upper Reservation of Fort MacArthur (UFM) were originally determined by the USAF not to be viable sites due to their existing use. The inclusion of BP and UFM as an alternative site and the consideration of BP and UFM in the DEIS analysis was due to the City of Los Angeles' proposal. It is recognized that any BP alternative may, under present circumstances, cause some loss of field availability during the time between start of construction on houses and completion of replacement fields. There is a possibility that no replacement fields may be able to provided due to lack of funds. This situation would present a significant impact to the uses of the BP ball fields.

4. <u>USAF Housing Will Overburden the Already Overutilized Fields and Recreational Facilities</u>

As indicated in Section 4.11.2 of the DEIS, the combination soccer/football field and baseball field are extensively used by the AYSO, Mary Star of the Seas High School, and the City of Los Angeles Parks Department. The soccer field at BP is the only soccer field open to the public in San Pedro. Data from the AYSO indicate that approximately 1,100 children from the community belong to this organization, which is the largest athletic program in the San Pedro community. Discussions with the AYSO and the City of Los Angeles Parks and Recreation Department indicate that the soccer field is used 7 days a week from the beginning of August to the end of February. USAF housing projects generally include some recreational facilities, including tennis and basketball courts. There will be, however, an increase in demand for the already overutilized recreational facilities (such as football and soccer fields) associated with the children of the field grade and senior officers who will occupy the proposed housing. The amount of increase in demand for recreational facilities by USAF personnel will result

from the number and age of the children. Additional demand will also occur associated with the 569 non-USAF housing units under construction or planned for the San Pedro area (see Table 5.13-3, p. 5-109 of the DEIS).

5. Preservation of Historical Sites, Parks

As described in Section 5.14 of the DEIS, the National Historic Preservation Act of 1966 and its implementing regulations require a determination as to whether or not the historical and archaeological site(s) are eligible for inclusion in the National Register of Historic Places. The USAF currently is conducting a survey to identify historical/archaeological sites on WP and BP. Previous surveys had been performed for UFM. If a site is found to be eligible for inclusion on the National Register during USAF consultation with the State Historical Preservation Office, a determination will be made by the USAF and State Historical Preservation Office to identify the level of impact to the site from the construction. If the impact is determined to be adverse, a memorandum of agreement (MOA) will be developed with the State Office of Historic Preservation, the Advisory Council on Historic Preservation, and the USAF to establish a plan to mitigate the adverse effects. The consultation process is described in RESPONSE NO. 1. Section 6.14 of the DEIS summarizes potential mitigative measures, including the monitoring of all surface cutting activities by a qualified archaeologist.

There are various other park units in the state park system besides State Parks. These include State Recreation Areas and State Beaches. As indicated in Section 5.1.1 (p. 5-82) of the DEIS, current plans for WP as a State Park may be altered by development of USAF housing at WP (SEE RESPONSE NO. 10). Although development of WP into a State Park would be limited by construction of USAF housing at WP, the development of WP into another category of park in the state park system or by the City of Los Angeles would

not be precluded. Depending on the alternative, land available for development of WP as a park (including the county land south of Paseo del Mar and Royal Palms State Beach) would range from 114 to 155 acres for the Proposed Action and the alternatives involving WP. The USAF believes the coexistence of housing and a city- or state-managed park at WP is compatible.

6. Transportation System to Alleviate Traffic

The location of the 170 housing units at a single location and with the personnel occupying these units working at a single location (i.e., LAAFS) would facilitate the use of car and van pools. For example, current data on the USAF personnel occupying the housing units at Middle Fort MacArthur (MFM) indicate that 75 percent participate in car pools, 10 percent use the bus, and 15 percent drive (see Section 5.13 of the DEIS). It is anticipated that a similar transportation use distribution would exist for the personnel planned to be housed in the proposed 170 housing units. As described in Section 6.13 of the DEIS, the use of ride sharing and flex-time scheduling will be encouraged for the work trip to LAAFS in El Segundo.

7. Use of BP and UFM not Consistent with Best Interests of San Pedro

The alternatives evaluation criteria (Section 3.2 in the DEIS) included the provision (Item No. 4) that the candidate site is not already committed to other uses. BP and UFM were originally found by the USAF not to be viable sites due to their existing uses. These sites were included in the alternatives (Section 3.5 of the DEIS) and were analyzed in the DEIS based on the City of Los Angeles' proposal to the USAF for use of these parcels as alternatives to all 170 units being constructed at WP. Based on the existing uses of BP and UFM and the requirement to relocate these uses, the USAF has determined that the Proposed Action (40 acres on WP) represents the best solution, not only for military housing but also for all segments of the community.

8. More than Half the Acreage Remaining at WP Would Remain as Open Space

The USAF has supported the coexistence of housing and a city- or state-managed park at WP. As indicated in Section 5.11 (p. 5-82) of the DEIS, current plans for WP as a State Park may be altered by development of USAF housing at WP. There are, however, various other park units in the State Park System besides State Parks. These include State Recreation Areas and State Beaches. Depending upon the final site selected, land available for development of a State Recreation Area or State Beach (including the county land south of Paseo del Mar and Royal Palms State Beach) would range from 114 to 155 acres for the Proposed Action and the alternatives involving WP.

9. Little Acknowledgement in the DEIS of the Level of Community Interest Expressed at the Scoping Meeting for Development of a State Regional Park

The meeting held on Dec. 11, 1985, was a scoping meeting to determine the scope of issues to be addressed and for identifying the significant issues related to the Proposed Action as required by NEPA and the implementing CEQ regulations (40 CFR 1501.7). Section 1.5 of the DEIS described the results of the scoping process. The issues raised through the public scoping process were summarized in Table 1.5-1. The DEIS (p. 1-22) did acknowledge that the primary concern of the community was the issue of land use, specifically the issue of utilizing WP for housing versus park development. Table 1.5-1 (p. 1-23) in the DEIS tabulated the number of times land use issues were raised (verbal and written) during the scoping process. As shown in Table 1.5-1, land use issues comprised 73 of a total 108 comments (67 percent).

The WP Park Feasibility Study, prepared by the California Department of Parks and Recreation, was described in Section 1.4.2 (Planning Programs) (pp. 1-16 to 1-17) of the DEIS. The recommendations of the feasibility study were summarized in this section of the DEIS.

The results of public hearings on the State Park proposal and the community support for the State Park were also described (p. 1-17). The detailed impact analysis performed for the Proposed Action and the eight alternatives in the DEIS (p. vii), indicated that the Proposed Action would have significant adverse impact on the State Park plans for WP (**SEE RESPONSE NO. 10**). Based on the existing uses of BP and UFM and the requirement to relocate these uses, the USAF has determined that the Proposed Action (40 acres on WP) represents the best solution, not only for military housing but also for all segments of the community.

10. Statements Made that Minimize the Level of Impact the Proposed Action will have on State Park Development of WP

Section 5.11 (p. 5-82) of the DEIS acknowledged the fact that the California State Department of Parks and Recreation has stated that construction of USAF housing on a significant portion of WP would deter the development potential of a State Park. The State Park designation is only one of seven designated park units in the State Park System. Units of the State Park System are classified into one of several categories, as required by the California Public Resources Code (PRC 5002-5019.75):

a. State Parks--Relatively spacious areas of outstanding scenic or natural character often containing significant historical archaeological, ecological, geological, and other such values, and having appropriate types of recreation.

b. State Recreation Areas--Areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs. Such areas are selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, and proven recreation resources, such as manmade or natural bodies of water.

c. State Vehicular Recreation Areas--Areas where topographic features and associated recreational vehicle opportunities are the primary values.

d. State Beaches--Areas with frontage on the ocean or bays, designed to provide swimming, boating, fishing, and other beach-oriented recreational activities.

e. Historical Units--Areas established primarily to preserve objects of historical, archaeological, and scientific interest, and to maintain places commemorating important persons or historic events.

f. State Reserves--Areas embracing outstanding natural or scenic characteristics of statewide significance which shall be preserved in a condition of undisturbed integrity.

g. State Wilderness--Areas at least 2,024 hectares (5,000 acres) in size, either by themselves or in a combination with contiguous areas (or are of sufficient size as to make preservation practical), which have been affected primarily by the forces of nature, and which allow solitary and primitive unconfined recreation. They may be established within boundaries of other State Park System units.

As indicated in Section 5.11 of the DEIS, there are 60 state-managed parks in the California State Park System that encompass 120 acres or less. These include 32 state beaches, 7 state recreational areas, and 21 historical parks. Sixteen of the state beaches have picnic areas and six have overnight camping in addition to picnicking. Whereas the Proposed Action would eliminate WP from consideration for development into a designated State Park, the remaining 124 acres (including the county land south of Paseo del Mar and Royal Palms State Beach) would remain for development by the state as a state recreational area, state beach, or state historical park or by the City of Los Angeles and/or Los Angeles County as a coastal park. There are a number of combined state and city/county parks in Los Angeles County where the beach area is a State Beach and the city or county controls the adjacent upland area and promotes picnicking, hiking, etc. **(SEE RESPONSE NO. 49).**

11. Statements Made in the DEIS That Pass Judgement on the Merits of a State Regional Park Being Developed in the WP Area--Focus Impact of Housing on the Area, Not the Impact of a State Park

The DEIS not only provided impact analysis of the Proposed Action and alternatives on the existing environment but also analyzed the cumulative impact of the USAF housing on projects under construction or planned for the area. NEPA and the CEQ-implementing regulations require analysis of cumulative impacts of planned projects, including those of other agencies. Analysis of cumulative impacts was raised as an issue during the public scoping process. Table 5.13-3 and Figure 5.13-3 (pp. 5-109 and 5-110) in the DEIS list the projects recently completed or proposed in the San Pedro Area. The development of WP into a state park is one of the projects planned for the area. This would occur if Alternatives D, G, or H are selected. If the Proposed Action or Alternatives A, B, C, E, or F are selected, the remaining 114 to 148 acres, although not sufficient for a State Park designation, could still be developed into a state-managed park such as a state recreational area, state beach, or state historical site (SEE RESPONSE NO. 10). The DEIS did not comprise an environmental assessment of park development at WP, it analyzed the cumulative impacts to the area of both the USAF housing and park development, the coexistence of which is a viable possibility.

The Harbor Division of the Los Angeles Police Department has expressed that the reporting district which includes the WP area has one of the highest crime rates in the division. Yet, the police have stated that they have few formal reports of criminal activity specifically at Royal Palms State Beach.

12. Statements that Lessen the Degree of Objectivity that Exists on the Part of the USAF in Reviewing Alternative Sitings

Table 3.5-1 (p. 3-20) of the DEIS presented eight alternative configurations for the USAF housing at WP, BP, and UFM. The

USAF expressed nonconcurrence with five (Alternatives B, E, F, G, and H) of the configurations due to housing densities incompatible with adjacent housing, the need to relocate numerous existing uses at BP and UFM, and the high cost of demolition associated with removal of existing buildings at UFM (SEE RESPONSE NO. 17). Although the USAF expressed nonconcurrence with the five alternative siting configurations, all eight alternatives received equal and complete impact analysis in the DEIS. A relative comparison of the environmental effects of the Proposed Action and each of the eight alternatives was presented in Table 2 (p. vii) of the DEIS.

13. Congressional Requirement for the USAF to "Resolve the Issue Regarding the Proposed Site"

The quote from the Congressional Record (Oct. 10, 1984) was taken out of context. The "issue" in question referred to resolution of the executive branch policy of requiring one Federal agency to pay another for Federal land (i.e., DOD paying DOI). See Congressional record in Appendix H. The conferees endorsed the position outlined in the Fiscal 1985 Military Construction Authorization Act which prohibited the use of appropriated funds to pay for land transfers. Subsequent to the Congressional appropriation, the executive branch determined that the property could be transferred to the USAF without requiring reimbursement (see letter in Appendix F from Mr. David Stockman, Director-Office of Management and Budget to Honorable Dwight Ink, Acting Administrator-General Services Administration--April 12, 1986).

USAF representatives have been meeting with City of Los Angeles representatives for more than a year. These meetings and correspondence have resulted in rejection of Los Angeles proposals to use BP and UFM. USAF and City of Los Angeles personnel have been meeting on a weekly basis since April 1986, to discuss various alternative sitings.

14. Inconsistency of Housing Data and Site Plans Developed by the City of Los Angeles for Alternative D and the Data Used in the DEIS for Alternative D

The conceptual site plan developed for Alternative D by the City of Los Angeles planning staff is one configuration. The USAF has proposed another configuration. It should be noted that the housing data developed in the DEIS by the USAF are only preliminary, as indicated in the footnote to Table 3.5-1 (p. 3-20). These housing units will be designed and constructed by one contractor based on competitive evaluation by the USAF of the proposals submitted to the USAF. Therefore, no site plans are available until the contract is awarded. To discuss density does not require site plans but rather an indication of the typical number of units per acre. This typical information was provided in the DEIS.

15. Omission of Statements About Housing Density Compatibility

Statements made in Sections 5.8 and 5.9 of the DEIS indicate that although the placement of multi-family units in the community will be consistent with the intermingled single- and multi-family nature of development in south San Pedro, there may be some landowners who feel that multi-family housing is not consistent with the single-family housing in the areas immediately adjacent to the site (e.g., across Weymouth Ave. to the east of the site or across Western Ave. to the west of the site). Although some community segments do not find attached units undesirable, multi-family housing could be perceived by some members of the community as potentially lowering property values of adjacent single-family developments.

16. Limited Scope of Contacts Made Among Citizens Not Associated With Agencies, Utilities, or Research Organizations

CEQ regulations implementing NEPA require that an early and open scoping process be initiated to identify the significant issues related to a proposed action and to involve the community at the

beginning. To accomplish this, a Public Scoping Meeting to determine issues to be included in the EIS was held on Wednesday, Dec. 11, 1985. The meeting was held at the Good Shepherd Lutheran Church, 1350 W. 25th St. in San Pedro, CA. USAF officials and Environmental Science and Engineering, Inc. (ESE) personnel (principal preparers of the DEIS) were present. The Scoping Meeting was conducted to provide an opportunity for groups and individuals to raise issues of significance related to a specific location for the housing on WP, BP, or UFM. Interested individuals and representatives of affected groups were invited to the meeting. The scoping meeting was attended by more than 200 individuals. Additionally, the USAF offered to conduct individual meetings with interested individuals, elected officials, and representatives of interested groups during the weeks of Nov. 18 to Dec. 10, 1985. Those persons or groups not able to attend the Public Scoping Meeting or who did not wish to speak at the Public Scoping Meeting, were invited to submit written comments to the USAF by Jan. 15, 1986. The USAF also met individually with the staffs of the California Coastal Commission and the State of California Department of Parks and Recreation as part of the scoping process. In addition, there have been numerous letters and meetings with the City of Los Angeles concerning its offer of BP and UFM. All of these inputs have played a significant role in the subsequent development of the DEIS.

Because San Pedro has no local governmental agencies, the USAF has turned to civil and service organizations as being representative of the community. These organizations were briefed on the USAF housing plans on several occasions. The list of service organizations notified of the Scoping Meeting is given in Appendix C of the DEIS (p. C-12) and includes the Kiwanis Club, Rotary Club, Lions Club, San Pedro Chamber of Commerce, AYSO San Pedro League, South Shores Homeowners

Association, and South Bay Area Chamber of Commerce, among others. A majority of the membership of these organizations either live or operate businesses in San Pedro. Additionally, numerous articles which either directly or indirectly addressed the proposed housing have appeared in the San Pedro News-Pilot. Public notices also appeared in local newspapers which notified interested individuals and groups about the Scoping Meeting (Dec. 11, 1985) and the Public Hearing (Apr. 22, 1986). At no time has the USAF declined an invitation to meet with individuals or community groups.

17. Use 36-Acre Area of UFM--Demolition Costs at UFM Inadequate, Ill-Considered Conclusion--Need Comparable Demolition Costs for NIKE Facilities

The proposed 36-acre area of UFM includes areas of severe slopes that are not economically buildable, the Merriam-Leary Battery that would require significant amounts of funds for demolition, and the relocation of the existing swimming pool for which funds were not included in the appropriation. In addition to the significant demolition costs associated with the Merriam-Leary Battery, there is also the potential historical significance associated with the battery and its involvement in World War I (WWI) and World War II (WWII), and its use as a control center for target acquisition and missile tracking during the NIKE era. For these reasons, the 21-acre parcel of UFM described in the DEIS was selected as the only viable area for the development siting.

The following costs were developed for demolition of existing structures on the 21-acre development siting at UFM (Figure 3.5-7, p. 3-30 of the DEIS):

Item No.	Description	Estimated Quantity	Unit	Unit Cost ($)	Total Cost ($)
1	Remove asbestos siding	117,600	ft^2	0.10	11,760
2	Asbestos disposal	22,400	lb	2.00	44,800
3	Demolish and dispose of wood frame buildings	28	each	4,500.00	126,000
4	Demolish and dispose of concrete footings	28,000	ft^3	0.25	7,000
5	Demolish and dispose of concrete tunnel entrance	19,200	ft^3	0.30	5,760
6	Seal tunnel entrance with concrete	20	yd^3	200.00	4,000
	TOTAL BASIC COST				199,320
	Plus 20 Percent Contingency				39,864
	TOTAL CONTRACT COST				239,180
	GS&A Plus 10 Percent				19,930
	TOTAL COST				$259,114
	ESTIMATE				$250,000 to $300,000

The above costs include only demolition of the tunnel entrance, disposal of the debris, and the sealing of the entrance with concrete. The costs do not include the filling of the subsurface tunnel passageways to prevent collapse. Available information (blueprint of the tunnel system in 1944) indicates extensive tunnel passageways (approximately 2,000 linear feet) beneath the proposed 21-acre development siting (see Figure 3-1). Because many of these tunnels were supported with wooden timbers, collapsing is occurring in some areas as the wood deteriorates. Costs to backfill these tunnels to ensure site stability would be substantial.

Demolition and debris disposal costs for the NIKE facilities at WP are estimated to be approximately $50,000 to $75,000. For

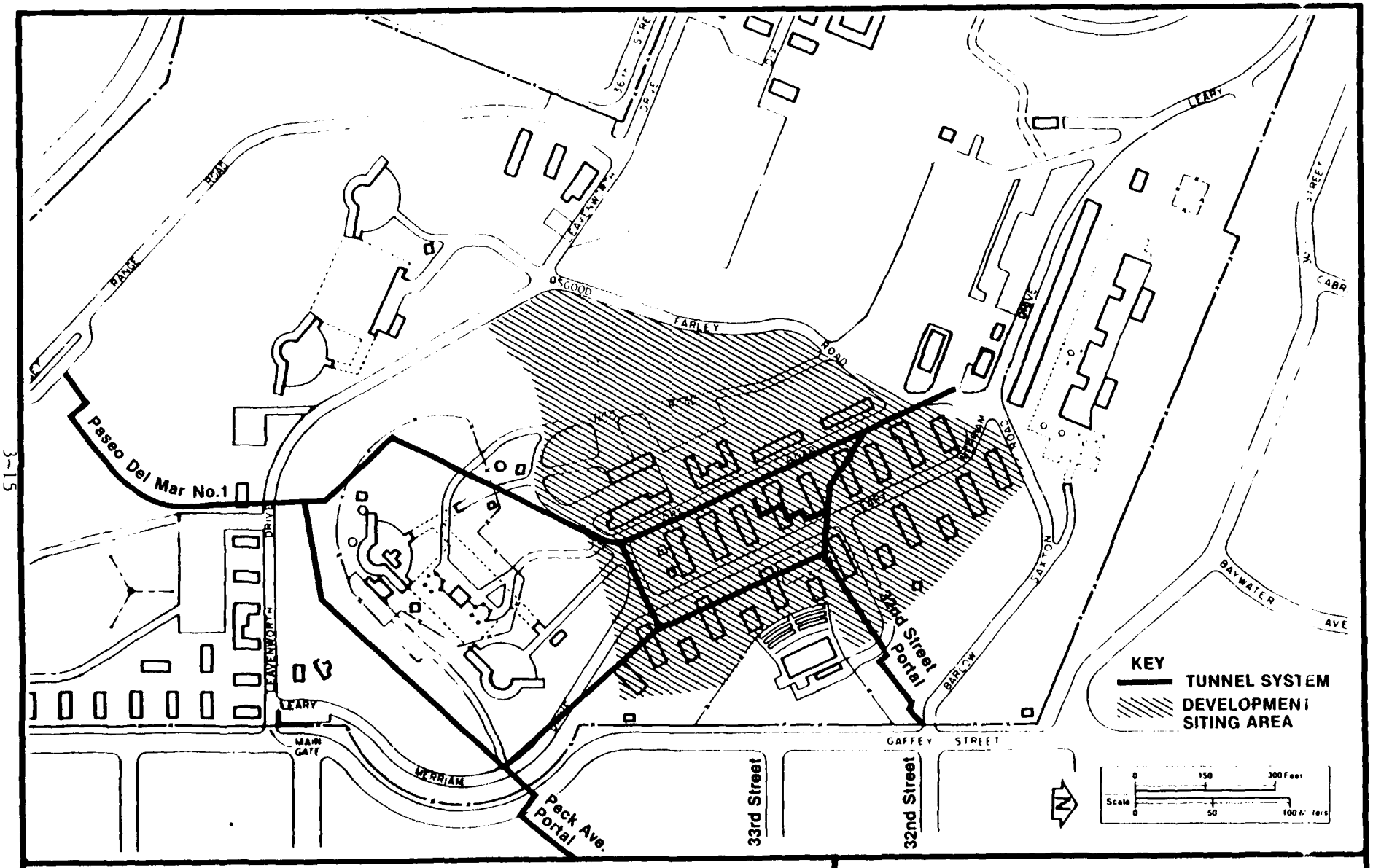


Figure 3-1
TUNNEL LOCATION MAP FOR UPPER RESERVATION OF FT. MACARTHUR

SOURCE: OFFICE OF THE POST ENGINEER, HARBOUR DEFENSES OF LOS ANGELES, FT. MACARTHUR, CALIFORNIA (1944).

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the Proposed Action, four small concrete block buildings (Bldgs. 1026, 1027, 1030, and 1050), one wood frame building (Bldg. 1021), and three small sentry stations (Bldgs. 1023, 1024, and 1025) would need to be demolished. Due to the structural integrity of the underground NIKE missile storage facilities (Bldgs. 1019 and 1020), it is anticipated that these facilities would only need to be backfilled. Demolition costs for the alternative configurations at WP would be less than the Proposed Action because fewer structures are involved. Alternative A does not involve any of the NIKE facilities, thus demolition costs are only those associated with removal of the concrete foundations of the former buildings that were located at the corner of Western Ave. and 25th St. (see Figure 4.11-3, p. 4-82 of the DEIS). The demolition costs associated with Alternative A are less than the Proposed Action or other alternatives.

18. Relocation of Ball Fields from BP to Another Location by the USAF

The relocation of ball fields from BP to another location was addressed in Section 5.11 of the DEIS. SEE RESPONSE NO. 3.

19. Government Having to Go Through Procedures to Construct Housing

Actions by Federal agencies are required to comply with NEPA, which is the basic national charter for protection of the environment. NEPA procedures ensure that environmental information is available to the decision maker, public officials, and citizens before decisions are made and before actions are taken. The preparation of the DEIS, FEIS, and Record of Decision (ROD) are all part of the NEPA process to compile relevant environmental data and provide analyses of impacts to the environment of the Proposed Action and reasonable alternatives.

20. Distinguish Between the Former Landfill at WP and the Debris Dump

As described in Section 4.11 (p. 4-86) of the DEIS, a former landfill consisting of three parallel trenches was operative on the western portion of WP during the 1950s. Due to subsidence of the backfilled material, the three former landfill trenches are readily apparent. Test pits dug into these trenches during the recent archaeological investigation confirmed the presence of the landfill in this area.

As indicated in this comment, a former construction debris disposal area is located in the drainage swale traversing WP from in front of the coastal battery down to the former skeet range. This "manmade" or artificial fill area has been documented by the recent geotechnical investigation at WP (Woodward-Clyde, 1986). The artificial fill (Qf) area on WP that your comment refers to is indicated in Figure 4.2-5 (p. 4-12) of the DEIS.

21. Misrepresentation of Attendance at Royal Palms State Beach

The attendance cited in the DEIS is based on daily use, not the number of visitors at any one time. Although there may only be several hundred at any given time, the turnover of visitors results in a daily summer attendance of 1,700 visitors each day. As noted in the DEIS, attendance estimates were obtained from the Los Angeles County Department of Beaches.

22. Evaluation of Other Alternatives to the WP Site--Extension of the Public Comment Period on the DEIS

As stated during the April 22, 1986 Public Hearing on the DEIS, the USAF has consistently been willing to evaluate any reasonable alternative to the housing at WP. The same statement was made at the Dec. 11, 1985 Public Scoping Meeting. To date, no additional reasonable alternatives, other than those included in the DEIS, have been identified by the public.

The evaluation of alternatives for housing of military members assigned to Space Division dates back to 1979, beginning with approximately 45 regional and local sites. Based on existing use and other factors, this list of 45 was narrowed to 20 sites for evaluation in this DEIS (SEE RESPONSE NO. 25). These 20 sites included 17 regional sites and 3 local sites: WP, BP, and UFM. These 20 sites are discussed in Section 3.0 of the DEIS. It is important to note that BP and UFM were originally found by the USAF not to be viable sites due to their existing use. However, these sites were included in the DEIS based on the parcels being offered by the City of Los Angeles as an alternative to all 170 units being constructed at WP.

Included in t evaluation of alternatives for 170 units at WP were three alternatives that would not require construction by the USAF. These were: a leased housing program, purchasing of existing units, and private construction in conjunction with a long-term lease by the USAF. As discussed in Section 3.4 of the DEIS, none of these are feasible.

As presented in the DEIS, the USAF has identified and discussed all reasonable alternatives to construction of 170 units at WP. The public comment period has not identified any other reasonable alternatives. As to the request to extend the comment period, the USAF accepted comments on the DEIS, including information concerning viable alternatives, through May 27, 1986. NEPA and the implementing regulation of the President's Council on Environmental Quality determined that a 45-day public and agency comment period on a DEIS is sufficient to allow adequate input from the public and agencies. (Due to the nature of this comment and to provide adequate opportunity during the 45-day comment period to provide additional alternatives, the USAF responded immediately to this 22 April hand-written comment with a letter to the commentor. A copy of the letter is included in Appendix G.)

23. DEIS Neglects the Removal of the Possibility of a State Park at WP

The DEIS acknowledges the proposed state park at WP throughout the analysis. The conceptual site plan from the WP Park Feasibility Study was provided in the DEIS (Figure 5.15-1; p. 5-120). The impacts of the Proposed Action and alternatives on the proposed State Park plan (as given in the California Department of Parks and Recreations Feasibility Study) were described in detail in Section 5.11. **SEE RESPONSE NO. 10.**

24. Requirement for the Property to be Large Enough for 170 Single-Family Housing Units

The alternatives selection criteria are listed in Section 3.2 (p. 3-5) of the DEIS. As shown, Item No. 3 of the criteria states that the parcel of land "must be of a size to permit construction of a reasonable number of housing units." The criteria listed in the alternatives selection process did not include the provision that the land must be large enough to accommodate all 170 single-family housing units. As described in the DEIS, neither BP or UFM is large enough for all 170 units, yet alternative siting configurations involving attached and single-family housing units on these parcels of land were analyzed throughout the DEIS. Based on the existing use of BP and UFM and the demolition costs at UFM, the USAF has determined that all 170 units at WP is the best solution for the USAF and the community. The remaining portion of WP would still be available for recreational development.

The construction of a reasonable number of housing units in one or two locations is necessary to economically consolidate security, maintenance, and family support structure. Additionally, there are other advantages (e.g., car or van pooling) that would occur due to a number of individuals living in a single location and working at a single location **(SEE RESPONSE No. 6).**

25. The Requirement of No Purchase of Property is Unduly Restrictive--DEIS Should Consider Other Alternatives

The provision that the appropriated funds were not to be used for land acquisition was part of the resolution associated with this congressional appropriation (Congressional Record-Oct. 10, 1984). This resolution reads in part as follows:

"The conferees have agreed to provide $11,800,000 for 140 housing units in support of the Air Force Space Division personnel in Los Angeles, California. However, funds have not been approved for land acquisition, and appropriated funds are not to be used for this purpose. The conferees endorse the position outlined in the fiscal year 1985 Military Construction Authorization Act which prohibited the use of appropriated funds to pay for land transfers. The conferees do not concur with the Executive Branch policy of requiring one federal agency to pay another for federal land."

The funding history for this project is summarized for Fiscal Year (FY) 83 and FY 85 as follows (in millions $):

	Requested By USAF	Authorization by Congress	Appropriation By Congress	Gramm-Rudman Act Budget Reduction
FY 83	3.1	2.7	2.7	2.6
FY 85	16.5*	15.1*	11.8*	11.3
Total Project	19.6	17.8	15.5	13.9

*The USAF originally requested $16.5 million, which included $1.4 million for land acquisition. The authorization of $15.1 million did not include land acquisition. The $11.8 million appropriated by Congress specifically did not include acquisition of land. This amount was then decreased to $11.3 million by the Gramm-Rudman Act.

The evaluation of alternative sites by the USAF includes more than 45 sites. This evaluation was based in part on a November 1981

housing survey conducted by the Naval Facilities Engineering Command (Western Division) which performed an evaluation of housing sites in the Los Angeles-Orange County area. The Navy study, under the direct management of the Assistant Secretary of Defense for Installation and Housing (ASD/I&H), identified a study area defined as a 1-hour commute from the Long Beach Naval Station. The study group was tasked with the identification of all Federal, state, and local government-owned property within the study area. The survey identified 45 sites which met this criteria.

The 45 sites were then ranked from 1 to 45 to determine their potential for military housing. They were ranked on 12 criteria:

1. Ownership and availability,
2. Compatible land use,
3. Location,
4. Access,
5. Community Services,
6. Public transportation,
7. Size,
8. Topography,
9. Seismic hazard,
10. Traffic,
11. Noise, and
12. Demolition.

The criteria were weighted to give ownership, cost due to acquisition, and current use, higher relative scores due to their importance. A matrix was developed to aid the analysis.

Based on the above criteria, the study reported that of the 45 sites, 10 were either Federally owned or had been deeded with a reversionary clause for national defense and were determined to be highest ranked sites and were identified for additional analysis. Of these 10 sites, 5 were directly Federally owned.

1. Middle Reservation of Fort MacArthur,
2. San Pedro Navy Housing,
3. Seal Beach Naval Weapon Station,
4. Lawndale Missile Plant, and
5. Los Alamitos Armed Forces Reserve Center.

All five were available for housing development; however, it was noted that for housing to be located at Los Alamitos, a waiver of DOD airfield clearance criteria would be required.

Three of the 10 sites had been deeded to the city of Los Angeles by the Federal government with a reversionary clause for national defense:

1. WP,
2. UFM, and
3. The Palos Verdes Public Quarters Area (Suang-Nau Village).

The remaining two sites were not recommended for housing due to their current use or pending action:

1. Helicopter Landing Facility (HOLF) Mile Square, and
2. The Naval Medical Center in Long Beach.

Of the remaining 35 sites, 33 are owned by various local school districts and were considered not suitable for additional analysis due to current use, size, and cost of acquisition. One site (San Pedro Hill AC&W), controlled by the Federal Aviation Association was eliminated due to current use, and one site was controlled by GSA.

The sites identified by the Navy study as having the highest potential for military housing were evaluated in the DEIS for the San Pedro Housing project. The Middle Reservation of Fort MacArthur (MFM) was eliminated because USAF housing had already been constructed on the available land; WP and UFM were evaluated

in the DEIS, and the Proposed Action and several alternatives for the housing involve some configuration of either WP or UFM.

In addition to these 45 regional sites, the USAF evaluated a number of other regional sites that were either located outside the Navy study area but within a reasonable distance from LAAFS, or were within the Navy study area but had become available after completion of the Navy study. None of these sites were found to meet the criteria for the housing project as documented in the DEIS (Section 3.4; pp. 3-8 to 3-17).

Three alternatives were evaluated in the DEIS (Sections 3.4.16, 3.4.17, and 3.4.18; pp. 3-17 to 3-19) that would not require construction by the USAF. These were a leased housing program, purchase of existing units, and private construction in conjunction with a long-term lease by the USAF (SEE RESPONSE NO. 22).

26. Replacement of Ball Fields--Replacing the Park Value of WP

The costs for replacement of ball fields has been estimated at $650,000. SEE RESPONSE NO. 3.

As discussed throughout the DEIS, the USAF has indicated that the housing and a city- and/or state-managed park at WP are compatible. The housing and park are not mutually exclusive. SEE RESPONSE NO. 10.

27. Alternatives Analysis is of Limited Scope; No Analysis of the Alternative of Using a Specific Allowance for Housing

The USAF has evaluated alternatives for housing of military personnel assigned to Space Division since the mid-1970s (SEE RESPONSE NO. 25).

28. Site Plans Not Provided in the DEIS

Conceptual site plans developed to date are preliminary and are intended for internal USAF use. The housing data presented in the DEIS are very preliminary planning figures as indicated in the footnote to Table 3.5-1 (p. 3-20). Final site densities will be determined following receipt of proposals from the architectural consultant (SEE RESPONSE NO. 14).

29. Inordinate Weight Given to Surrounding Housing Developments Rather Than Surrounding Zoning

The construction of single-family homes at a density compatible with adjacent residential neighborhoods was recommended by the Mayor's Advisory Committee on Military Housing (May 82). Councilwoman Flores indicated to the USAF in October 1983 that the community supported the single-family concept. Local zoning regulations provide maximum allowable densities. It does not preclude development below this maximum density (SEE RESPONSE NO. 15).

30. DEIS Fails to Evaluate in Any Substantial Detail the Alternative Suggested by the City of Los Angeles for Clustered Development On WP and BP

The city's proposal for clustered development on WP and BP is designated as Alternative D in the DEIS. Although the USAF expressed noncurrence with this alternative due to housing density incompatible with adjacent housing, this alternative received equal and complete impact analysis throughout all sections of the DEIS. A relative comparison of the environmental impact of this alternative versus the Proposed Action and the other seven alternatives was presented in Table 2 (p. vii) of the DEIS. As shown in Table 2, the selection of Alternative D significantly impacts the existing recreational facilities that have been developed at BP. A segment of the community does not support this alternative due to this loss of a highly utilized recreational facility.

31. Existing Zoning Allows for Higher Densities than Proposed in the DEIS--Density of Navy Officer Housing

Each military housing project constructs homes based on a number of conditions that are unique to each project. The criteria used by the Navy for construction of the homes along 25th St. in the 1960s are not known. **SEE RESPONSE NO. 29.**

32. Alternative Configurations of Development Should Be Systematically Examined in the DEIS

In addition to the Proposed Action, eight alternative configurations for the USAF housing at WP, BP, and UFM were examined in the DEIS. These are given in Table 3.5-1 (p. 3-20) of the DEIS. All eight alternative configurations received equal and complete impact analysis throughout the DEIS. A relative comparison of the impacts associated with each of these alternatives was presented in Table 2 (p. vii) of the DEIS.

33. More Than 90 Housing Units Could be Sited at BP

The determination of the 90 units density at BP is based on two factors: (1) due to topography, only 16.5 of the 22 acres are buildable given the limited funds available for construction (funding does not allow for extensive earth work or special construction necessary for building houses on slopes); and (2) the community support for compatible single-family homes. The RD2 zoning just west of BP is based on the development of the high-density condominium along Western Ave. When the Los Angeles Zoning Map is reviewed, it shows that except for tnat small parcel, the rest of the area surrounding BP is zoned residential R1 low density, single-family. Zoning is only a high-end bench mark and does not require that densities meet that level. It is up to the site developer to determine the number of units to be constructed as not to exceed the maximum density.

34. BP Could Support 154 Housing Units at the Existing Zoning

Topographical surveys and funding limitations have determined that only 16.5 acres of BP, not 22 acres, are economically buildable (SEE RESPONSE NO. 33).

35. 104 Single-Family Units Could Be Developed at BP With 5,000-ft^2 Lot Sizes

The density of 4.7 units per acre is based on the entire 22-acre parcel, of which only 16.5 acres is buildable. The steep sloped area along the north side of BP is not buildable. The USAF believes "net" density is the more appropriate method for expressing housing density because "net" density determines the overall visual appearance of the housing units. SEE RESPONSE NOS. 33 AND 34.

36. Adjacent Navy Housing Has a Density of 5.6 Units Per Acre In A Mixed-Use Configuration

SEE RESPONSE NO. 31.

37. Evaluation of Alternative Development Configurations

SEE RESPONSE NO. 32.

38. No Basis for Concluding That the Proposed Action Has the Least Impacts

In addition to the Proposed Action, eight alternative development configurations (A through H), each with different housing densities, received complete impact analysis in the DEIS. A comparative analysis of the relative impacts of each alternative in 37 areas of potential environmental effects was performed in the DEIS. A comparison of the impacts associated with the eight alternative configurations is graphically depicted in Table 2 (p. vii) of the DEIS. Additionally, Section 3.6, "Comparative Analysis of Environmental Impacts of Proposed Action and Alternatives" (pp. 3-32 through 3-49), describes the comparative analysis of the alternative configurations. Impacts that were

determined to have either a potentially significant or adverse effect were designated by a superscript identifier in Table 2 and were discussed in Section 3.6.

It should be recognized that no numerical weighting can be attached to each impact (e.g., stormwater runoff impacts are not necessarily equivalent to change in vistas). A total impact value, therefore, cannot be generated for each alternative, and the minimum value selected. The USAF believes that a city- or state-managed park can co-exist with the USAF housing. The Proposed Action development at WP does not exclude park development on the remaining city, county, or state property (see Response No. 10). The comparative analysis performed for each alternative configuration in the DEIS (and described above) is the basis for concluding that the Proposed Action is feasible. Additionally, it should be noted that the NEPA process is to assist the decision-maker in making an informed decision on the final site. Environmental impacts as well as other factors such as economics and overall agency goals must be considered in the decision-making process.

39. Lack of Cost Information on the Demolition at UFM--Limited Analysis of Continued use of the Housing Allowance and Existing Housing

SEE RESPONSE NOS. 17 AND 27.

40. Not Sufficient Analysis to Conclude the Proposed Action is the Least Environmentally Damaging Alternative

SEE RESPONSE NO. 38.

41. DEIS Fails to Assess the Impact of the Proposed Project on the State Park--USAF Implies that Size is the Critical Criterion

SEE RESPONSE NOS. 10 AND 38.

The criterion of size as it relates to recreational use was not developed by the USAF. The city of Los Angeles, California Department of Parks and Recreation, and the CCC have expressed concerns about size. The USAF has stated that there is sufficient acreage for both housing and a park.

42. Visual Experience of WP is of an Undeveloped Rather than Urban Area

WP is in the middle of a residential area. This location, as indicated in the DEIS, is not visible from the beach due to the cliffs and is out of view of the houses along Westeran Ave. due to the steep terrace along Western Ave. Although it may be visible from further out to sea, it will appear as only an extension of the existing residential neighborhoods. The steep terrace along Western Ave. would be retained for scenic overviews of the coast and ocean if the Proposed Action siting is implemented. The impact analysis in the DEIS did identify that the Proposed Action and Alternative A would have relatively higher levels of impact on aesthetic vistas than the other alternatives (see Table 2; p. vii).

43. DEIS Contained a Limited Analysis of Visual Impacts--Photographs are Necessary

Impacts on visual aesthetics, both from shore and offshore, for the Proposed Action and the eight alternative configurations were described and analyzed in Section 5.15 (p. 5-115 through 5-119) of the DEIS.

Terrestrial photographs to pictorially describe the landscapes and views from WP and UFM with descriptive legends were presented in Appendix E of the DEIS.

44. Proposed Action Development Would Destroy the Visual Experience of WP as an Open, Undeveloped Area

SEE RESPONSE NO. 42.

45. An Extensively Revised DEIS is Needed

SEE RESPONSE NOS. 22 AND 38.

46. Use of WP for Housing Would Destroy its Potential for Recreational Use

SEE RESPONSE NOS. 5 AND 10.

47. Consultation with the Local Native American Community to Avoid Adverse Impacts to Archaeological/Ethnographic Sites

Archaeological surveys of WP and BP are currently in process. Previous surveys had been performed for UFM. Several cultural sites have been located and these were described in Section 4.14 of the DEIS. The NEPA process assists public officials in making a decision on the final site selection (i.e., the Proposed Action or Alternatives A through H). The final site selection, therefore, does not occur until the EIS process is complete, including publication of the DEIS, the FEIS, and the Record of Decision. Once the final site is selected, the USAF will comply with all applicable regulations and laws including consultation with the Regional Commissioner and local Native Americans to develop mitigation measures and contingency plans for any identified archaeological/ethnographic sites. Until final site selection is made, specific mitigation measures and contingency plans cannot be developed.

48. School Enrollment Projected to Exceed Capacity

The issues of school capacity, enrollment trends, and ethnic balance were examined more closely to reevaluate the impacts of the proposed housing project on the school district. Mr. Robert Niccum (Chief Realty Agent, Los Angeles Unified School District) suggested that Ms. Kathyrn Friedman (Realty Division) be contacted to obtain information needed for the analyses. Ms. Friedman delegated this responsibility to Ms. Sue Brooks.

Based upon historical population growth for San Pedro, trend projections were used in the DEIS to estimate future enrollments and the associated school capacities. Los Angeles County utilizes the cohort-survival population projection technique in determining future enrollment. These enrollment projections were not provided at the time the DEIS was being prepared.

As a result of these new enrollment figures provided by Ms. Brooks (personal communication, June 5, 1986), impacts have been revised to reflect that the project will impact White Point Elementary School by exceeding capacity by 7 percent during the 1986-87 school year and by 8 percent during the 1987-88 and 1988-89 school years. This compares with the original analysis which identified enrollment capacity of 95.2 percent for the 1986-87 school year. Capacity will be exceeded at San Pedro High School by 3 percent during the 1986-87 school year as projected in the DEIS. During the 1987-88 and 1988-89 school years, capacity will be exceeded by 2 percent. Capacity will not be exceeded at Dana Point Junior High School during these three school years.

Through telephone conversation with Ms. Brooks, it was determined that capacity at schools in the Los Angeles Unified School District was a function of the number of students per classroom and the ethnic balance at each school. The ethnic balance at each of the three schools was requested from Ms. Brooks, but was unobtainable in time for this response. The same holds true for the ethnic balance of the USAF dependents who will attend the three schools, because the ethnic composition of the USAF officers assigned to Space Division and who will reside in the 170 homes is not known. The ethnic balance of the officers will change as officers are rotated.

Information was received from Mr. Pat Spenser (personal communication, January 15, 1986), Public Information Officer of the Los Angeles Unified School District, which revealed that 32.1 percent of the elementary schools in Region A were projected to be operating at 95 percent of capacity or above during the 1985-86 school year. Even without the addition of USAF dependents, White Point Elementary School will be operating above capacity by the 1987-88 school year. In addition, capital facility improvements are not programmed for the school. A review of information

provided on high schools indicates that approximately 40 percent of all high schools were projected to exceed capacity by an average of 9.4 percent during the 1985-86 school year. The incidence of enrollment exceeding capacity is anticipated to remain the same or increase in the near term based upon population projections for the Los Angeles area. It is expected that the additional students will be accommodated at other local schools that have available space. The particular schools at which students will be accommodated will depend on the actual conditions existing when the units are occupied in 1987.

49. WP is the Last Remaining Undeveloped Coastal Property

Many coastal areas in Los Angeles County are controlled by the state, county, and/or local municipalities to provide public access to the coast. A review of ownership records in the county tax assessor's office indicates that there are 39 individual areas along the coast in Los Angeles County. The locations of these areas are shown in Figure 3-2; Table 3-1 lists each parcel.

A number of areas have combined state-owned oceanfront property (i.e., beaches) with adjacent upland areas owned by the county or city. These parcels provide both upland and coastal access and are usually only separated by a roadway (e.g., Pacific Coast Highway, etc.). The combined 124 acres of oceanfront and upland state, county, and city property in the WP area could provide a similar type of resource that could coexist with the adjacent residential community as well as the proposed USAF housing.

50. Cutting and Leveling the Hill for Military Housing

As described in Section 5.14 (p. 5-112) of the DEIS, a former homesite occupied by Japanese families would be impacted by the Proposed Action. If the Proposed Action is selected for the housing, the USAF will coordinate efforts with the California State Office of Historic Preservation and the Advisory Council on

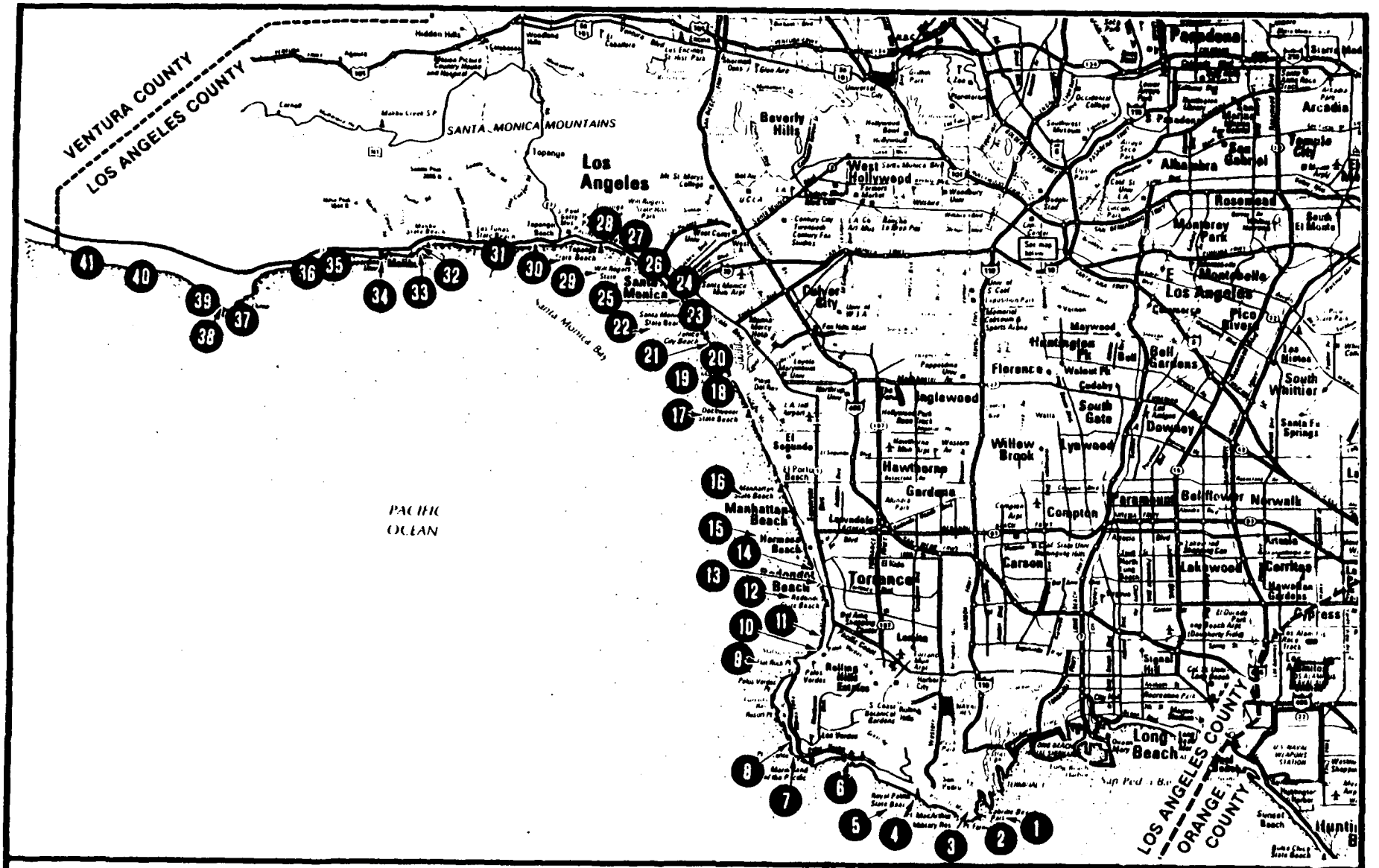


Figure 3-2
STATE, COUNTY, AND CITY COASTAL PROPERTY IN LOS ANGELES COUNTY
SOURCE: ESE, 1986.

Environmental Impact Statement

Air Force Space Division

Housing Project, San Pedro, California

Table 3-1. State, County, and City Coastal Property in Los Angeles County

Map Designation No. (see Figure 3-2)	Name	Owner	Area (acres)
1	Cabrillo Beach/Park	City of Los Angeles	36
2	Pt. Fermin Park	City of Los Angeles	37
3	Angeles Gate Park	City of Los Angeles	64
4	White Pt. Beach	County of Los Angeles	20
5	Royal Palms State Beach	State of California	18
6	Abalone Cove County Beach	County of Los Angeles	65
7	Pt. Vincente Fish Access	County of Los Angeles	7
8	Pt. Vincente Interpretive Center	County of Los Angeles	28
9	Flat Rock Scenic Overlook	City of Palos Verdes Estates	5
10	Torrance Beach Park	County of Los Angeles	41
11	Miramar Vest Pocket Park	City of Torrance	1
12	Redondo State Beach	State of California	85
13	Seaside Lagoon	City of Redondo Beach	4
14	Veteran's Park	City of Redondo Beach	6
15	Hermosa State Beach Park	State of California	110
16	Manhattan State Beach	State of California	44
17	Dockweiler State Beach	State of California	255
18	Vista Del Mar Park	City of Los Angeles	2
19	Del Rey Lagoon Park	City of Los Angeles	12
20	Venice Municipal Beach	City of Los Angeles	238
21	Venice Beach Recreational Center	City of Los Angeles	5
22	Santa Monica State Beach	State of California	44
23	Beach Park 1	City of Santa Monica	5
24	Ocean View	City of Santa Monica	6
25	Crescent Bay Park	City of Santa Monica	2
26	Palisades Park	City of Santa Monica	26
27	Palisades Park	City of Los Angeles	46
28	Temescal Canyon Park	City of Los Angeles	49
29	Will Rogers State Beach	State of California	93
30	Topanga State Beach	State of California	22
31	Las Tunas State Beach	State of California	3
32	Malibu Surfrider State Beach	State of California	37
33	Malibu Lagoon State Beach	State of California	77
34	Malibu Bluffs State Recreational Area	State of California	NA
35	Corral-Solstice Beach	State of California	4
36	Dan Blocker State Beach	State of California	NA
37	Pt. Dume State Beach	State of California	34
38	Zuma Beach County Park	County of Los Angeles	105
39	Robert H. Meyer Memorial State Beaches	State of California	37
40	Nicholas Canyon County Beach	County of Los Angeles	40
41	Leo Carrillo State Beach	State of California	1679

NA = Information not available, State of California, Dept. of Parks and Recreation.

Source: ESE, 1986.

Historic Preservation to mitigate adverse impacts to the site (see Section 6.14; pp. 6-9 to 6-10 of the DEIS).

As described in Section 5.1 (p. 5-1), the houses would be sited along the existing flat terraced areas. The construction of housing and roadways on these terraces would not alter the general terraced nature of the site. There would not be any cutting and leveling of the natural sloped areas on any of the sites.

51. Need WP for Recreational Purposes

SEE RESPONSE NOS. 5 AND 10.

52. Circulation of DEIS Does Not Fulfill USAF's Responsibilities Under Section 106 of the National Historic Preservation Act of 1966

SEE RESPONSE NO. 1.

53. USAF Must Afford the Council an Opportunity to Comment on the Effect of the Project

SEE RESPONSE NO. 1.

54. WP Property Should be Available for Use by Everyone

The USAF believes that housing and a city- or state-managed park can co-exist at WP; the two are not mutually exclusive. See **Response Nos. 5 and 10.**

55. Wildlife at WP Much More Diverse Than Reported in the DEIS

Vertebrate faunal field investigations originally were conducted at WP and UFM on Dec. 7, 1974. These investigations were used in the 1975 EIS performed by the USAF for family housing and were later used for the July 1984 Environmental Assessment of WP. A checklist inventory of existing species was produced and included those species expected to occur as well as those actually observed and observed through indirect evidence (e.g., tracks, fecal droppings, burrows, etc.). The species were identified by location of siting and by relative abundance, both onsite and in Southern California.

The vertebrate investigations for the DEIS were conducted by Dr. Michael Recht on Dec. 22-24, 1985, at WP, UFM, and BP. These investigations included a checklist inventory of species similar to the earlier work described previously, but the recent investigations also included trapping (24 live traps for small mammals in three strings in three areas of WP) and a series of terrestrial photographs depicting the WP and UFM landscapes and habitats. Because species diversities can change according to season, an additional vertebrate faunal survey at each of the three sites (WP, UFM, and BP) was conducted on May 12, 14, 16-18, 1986. The effort was similar to that conducted in December 1985 and reported in the DEIS. Forty live traps in four strings were placed in four areas of WP during May 16-17, 1986. The complete report of the investigation is included in Appendix D of the FEIS.

Investigations of the flora were conducted for the WP and UFM sites on Dec. 7, 1974, for the 1975 EIS for USAF Housing and these results (and an additional survey in 1984) were used for the 1984 EA of WP. The investigation included a walkover survey and checklist inventory of the species observed from direct and secondary evidences.

Investigations performed for the DEIS were conducted at WP, UFM, and BP in late December 1985, February-March 1986, and May 1986. The three separate surveys were conducted to document seasonal changes in flora and to investigate the potential occurrence of the Palos Verdes blue butterfly during both the dormant and active phases of its life cycle. In addition to a walkover survey and checklist inventory similar to the previous investigation, a survey specifically for the Palos Verdes blue butterfly foodsource, Astragulus trichopodus var. lonchus was conducted. This included walking transects spaced at 25- to 50-ft intervals. The previous existing Astragalus plants at WP expired between the March and May 1986 surveys. See discussion in **RESPONSE NO. 183.**

56. Construction of Housing Along 25th Street Next to Existing Military Housing Would be More Acceptable--BP and UFM Has Space Available for Housing

SEE RESPONSE NOS. 10 AND 17.

57. USAF Should Request Additional Money from Congress for Acquisition of Land Parcels that Meet the Selection Criteria

SEE RESPONSE NO. 25.

58. If Land is Utilized for Housing, the State Park at WP Will Not Exist

SEE RESPONSE NOS. 5 AND 10.

59. WP Park Not Considered in the DEIS

SEE RESPONSE NO. 41.

60. Federal Government Not Subject to NEPA--Nice That USAF Believes the Housing Project is Worthy of Environmental Review

SEE RESPONSE NO. 19.

61. Initial Assessment of Toxic/Hazardous Materials at WP

Due to its primary mission, the DOD has long been engaged in operations dealing with toxic and hazardous materials. Federal, state, and local governments have developed strict regulations to require that disposers identify the locations and contents of disposal sites and take action to eliminate the hazards in an environmentally responsible manner. The primary Federal legislation governing disposal of hazardous waste is Resource Conservation and Recovery Act (RCRA) of 1976, as amended. Under Sec. 6003 of the Act, Federal agencies are directed to assist EPA, and under Sec. 3012, state agencies are required to inventory past disposal sites and make the information available to the requesting agencies. To assure compliance with these hazardous waste regulations, DOD developed the Installation Restoration Program (IRP). The current DOD IRP policy is contained in DEQPPM 81-5, dated Dec. 11, 1981. DOD policy is to identify and fully evaluate

suspected problems associated with past waste disposal practices and to control hazards to health and welfare that resulted from these past operations. The IRP will be the basis for response actions on DOD installations under the provisions of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as clarified by Executive Order 12316. CERCLA is the primary Federal legislation governing remedial action at the past hazardous-waste disposal sites (40 CFR 300).

As described in Section 4.11 (p. 4-86) of the DEIS, the IRP is performed in four phases. These phases are defined as follows:

1. Phase I. Initial Installation Assessment (Records Search). To identify and prioritize those past disposal sites that may pose a hazard to public health or the environment as a result of contaminant migration.
2. Phase II. Confirmation. To define and quantify by preliminary and comprehensive environmental and/or ecological survey, the presence or absence of contamination that may have an adverse effect on public health or the environment.
3. Phase III. Development of technological base, if required.
4. Phase IV. Development of remediation alternative, selection of an alternative, and action, if required.

As indicated in the DEIS (pp. 4-85 and 4-86), the COE (Huntsville District) has conducted the IRP Phase I Initial Installation Assessment of WP. In the IRP program, the Corps of Engineers (COE) has been assigned responsibility for investigating formerly owned military property to determine if hazardous materials exist on these excessed sites, however, the USAF has requested to be the lead agency in the investigation of WP, BP, and UFM. The USAF (Space Division) currently is conducting Phase I investigations at

BP and UFM. In addition, the USAF is conducting a survey of UFM to determine quantities of asbestos that may exist in the WWII-era buildings.

62. Imperative That Soil and Water Sampling Be Performed At WP

Due to the possibility of contamination from former operations at WP, the USAF (Space Division) has initiated an investigation of the WP site. This investigation will include soil and ground water analyses at the former landfill and at potential spill or hazardous materials storage sites. As indicated in the DEIS (p. 4-86), if it is determined by sampling and analysis that contaminated materials exist on WP, and that these materials present a risk to human health or environmental quality, appropriate remedial action, as determined by engineering feasibility studies, would be undertaken as part of Phase IV. All of these actions would be fully coordinated with appropriate local, state, and Federal regulatory agencies. Any remedial control and/or cleanup measures will be implemented prior to construction of housing. Cleanup and/or control of contamination would occur at WP, BP, and UFM as part of the DOD IRP, regardless of whether or not the site is selected for USAF housing.

63. EPA's NPL Contains Seven California Military Bases as Candidates for Hazardous Waste Cleanup

The DOD, similar to private industry, conducts a number of industrial processes and manufacturing operations. Former disposal of wastes from these operations followed standard disposal practices in use at the time. In the mid- to late-1970s, it became recognized that the common waste disposal practices used nationwide for industrial wastes presented a potential for environmental contamination. In recognition of the need for improvement of these waste disposal practices and the need for remedial cleanup actions at past disposal sites, the U.S. Congress passed CERCLA in 1980. CERCLA requires notification of all known or suspected hazardous

waste sites. DOD has responded by identifying numerous sites suspected of containing hazardous wastes. SEE RESPONSE NO. 61.

64. A Complete RI/FS Should Be Conducted In Accordance With EPA's Published Guidelines And Regulations

Response actions at military installations are conducted by DOD pursuant to Executive Order 12316 and the Memorandum of Understanding of Aug. 12, 1983, between the EPA and DOD. EPA participates in the response actions of DOD in each of the IRP phases (Phase I through IV). Phase II of the IRP is equivalent to a Remedial Investigation (RI), while Phase IV constitutes a Feasibility Study (FS) and remedial action. The IRP Phase II and IV actions are consistent with EPA-published RI/FS guidelines.

65. Why Is This a National Defense Project? How is Recruitment Stifled?

As described in Section 3.3 of the DEIS, LAAFS is experiencing reluctance of personnel to consider assignment to this area due to the high cost of local housing. As discussed in Section 1.2 of the DEIS, recent housing surveys have substantiated the existing deficiency in available adequate housing.

The USAF's aerospace responsibilities at LAAFS are essential to national security, and USAF offices must be staffed with competent, highly skilled scientists and technicians. For example, on a typical USAF base, the housing is allocated based on 18 percent for officers and 82 percent for enlisted personnel. LAAFS has 72 percent officers, most of whom possess advanced degrees. In addition, the officers and enlisted members assigned to LAAFS possess skills in great demand by private industry. For the USAF to attract and retain these highly qualified/specialized scientists, engineers, and technicians, it must provide adequate, affordable housing. Not to provide the needed housing would mean a continuance of unsatisfactory living conditions for a large number

of families. The lack of adequate housing inhibits the USAF from attracting and retaining qualified and dedicated personnel. This results in the loss of highly qualified individuals to retirement, civilian employment, or other assignments. The difficulties involved in attracting qualified personnel to the Los Angeles area potentially adversely affects the ability of the Space Division to perform its mission. This, in turn, potentially has an adverse effect on national defense.

Military family housing is an integral part of the national defense. Providing affordable, decent, and safe housing for military personnel whenever possible is the policy of the U.S. government. These people staff the defenses of the country and their morale and well-being are directly and appropriately linked with the well-being of their families. Housing for military families has been provided at public expense since the 19th Century, and a major investment program in housing is underway today. Congress recognizes that housing of military families is a part of the national defense and includes housing in national defense budgets through MCA bills. The argument that "national defense" consists only of weapons systems is in error. Acquisition of property under a national defense reversion clause for military family housing is a proper use of the reversion power.

66. Why Not Buy Housing In the Civilian Community? Why Must Officers Live In Close Proximity To Each Other?

Three alternatives were evaluated in the DEIS that would not require construction of housing by the USAF. These were a leased housing program, purchase of existing housing units, and private construction in conjunction with a long-term lease (built-to-lease) by the USAF. Sections 3.4.16, 3.4.17, and 3.4.18 describe Congressional elimination of the leased housing program in the early 1980s, the infeasibility of purchasing existing units, and the Appropriations Committee's current freeze on the DOD "Build-To-Lease" program.

The purchase of 170 housing units with the appropriated $13.9 million on the open market would require a developer to sell houses at approximately $82,000 each. Those houses would have to be within a 1-hour's drive and 30 miles of LAAFS. As indicated in the DEIS, the median price of houses in the Los Angeles/Orange County area is approximately $136,000. In addition, the purchase of houses on the open market would necessitate the purchase of the accompanying land and Congress has specifically denied the purchase of land with the appropriation (SEE RESPONSE NO. 25). The $13.9 million for this project is the total amount available, including demolition of existing facilities, site grading, roads, parking areas, and utilities. In addition to actual home construction for the Proposed Action, it will require approximately $1 million to prepare the site, leaving $12.9 million for construction of the 170 houses (approximately $75,000 per house). SEE RESPONSE NO. 25.

67. What Definite Assurance Is There That Additional Land At WP Would Not Be Developed?

USAF will support the City of Los Angeles request for a change in the reversionary clause of the transfer deed to WP regarding Dept. of Defense Requirements (see letter dated December 17, 1985, in Appendix G).

68. Why Must the Density of the Housing Be Compatible with Surrounding Housing--Why Not Purchase Condominium Projects?

As described in Section 5.8 (p. 5-68) of the DEIS, the Federal Government is exempt from local zoning regulations. It is intended, however, that the housing would be, to the extent possible, laid out in a manner compatible with the densities of adjacent residential development. While some community segments do not find attached multi-family units (high density) undesirable, multi-family housing could be perceived by some adjacent homeowners as potentially lowering the property values of adjacent single-family developments. Eight alternative configurations with various

housing densities involving WP, BP, and UFM were analyzed in the DEIS. SEE RESPONSE NO. 66.

69. Cumulative Impact of "Militarization" of the San Pedro Community--Effect of Transience of Military Personnel On Services

The cumulative impacts of the DOD housing were described at the end of each of the 16 principal disciplines. In addition to the proposed USAF housing, the relevant cumulative impact sections considered the recently completed USAF housing project at MFM and the proposed Navy housing at Suang-Na Village (e.g., see Table 5.9-1 in Section 5.9.10, pp. 5-75 to 5-77).

Due to the demand for the USAF housing, the housing units will be at 100-percent occupancy on a continuous basis. Because the military personnel are rotated on assignments, the vacated housing units of military members transferred from LAAFS would be quickly reoccupied by incoming military personnel. Although the individuals themselves change, the demand for services, such as schools and recreational access would remain at a relatively constant level consistent with the number of housing units, as described in Section 5.11 (p. 5-80) of the DEIS.

70. Reason for Constructing Housing Offbase is Unclear

The entire area (Areas A and B) of LAAFS (approximately 96 acres), located in El Segundo, is completely occupied by administrative offices, research facilities, maintenance shops, a commissary, and dining facilities. There is no land available for housing construction on either Area A or B of LAAFS. LAAFS differs from the vast majority of USAF installations because until 1982 it had no onbase housing for its military members. To meet a portion of the critical need for housing at LAAFS, the USAF in 1982 acquired MFM in San Pedro from the U.S. Army for construction of 370 family-housing units for enlisted personnel and junior officers assigned to LAAFS. These 370 units met only a part of the total

housing requirement at LAAFS. The MFM was acquired for housing because LAAFS has no space available for housing. The additional 170 units proposed at WP would satisfy the housing deficit for LAAFS.

71. Cost Information About the Housing Project Not Documented in the DEIS

The per-unit cost for the project (approximately $87,000) was provided in Section 3.4.17 (p. 3-18) in the DEIS. That figure multiplied by the 170 units provides the approximate total project costs. The total amount of funds available has recently been further reduced by the Gramm-Rudman Act, such that the total funds available is $13.9 million or $82,000 per house for the 170 units (SEE RESPONSE NO. 25).

72. Removal of Existing "Expansive Soil"--Where Will It Be Deposited?

The disposal of demolition debris (wood, concrete rubble, etc.) and soils that are excavated during site preparation is the responsiblity of the construction contractor. As part of the USAF's contract with the construction company, the USAF requires that these materials be disposed of in accordance with applicable regulations.

73. Disposal of Potentially Contaminated Soil

The WP site is under investigation to determine if any toxic or hazardous materials were disposed of or spilled at WP. This investigation will be completed before any construction work begins at the site. Any contaminated materials identified at WP, BP, or UFM during the investigation which require cleanup will be removed and disposed of in accordance with EPA and State of California hazardous waste regulations. SEE RESPONSE NO. 62.

74. DEIS is to Help Officials Make a Decision Based on Environmental Consequences

SEE RESPONSE NO. 19.

75. USAF has not Diverted from Original Plans

As described in Section 1.0 (p. 1-1) of the DEIS, an Environmental Assessment was prepared in July 1984 for location of the proposed housing on a 50-acre parcel of land in the western portion of WP. The USAF subsequently determined that an EIS is required for the proposed housing. The objective of the DEIS is to identify, describe, and analyze the environmental issues associated with the housing project at WP and its alternatives. Various alternative housing sites also were examined in the DEIS. These alternative sites are based on the proposals by the city of Los Angeles involving the use of 22 acres at BP and 21 acres at UFM and reduced areas of WP. These alternative siting configurations are summarized in Table 3.5-1 (p. 3-20) and described in detail in Sections 2.0 and 3.0 of the DEIS.

76. USAF Housing will Preclude Park Development

SEE RESPONSE NO. 10.

77. WP is Last Parcel of Ocean Property

SEE RESPONSE NO. 49.

78. USAF Housing Should be Constructed at Another Location

SEE RESPONSE NO. 22.

79. USAF Should Consider Using "Alternative A" for Construction of the Housing

As described in the DEIS, the Alternative A siting is the original Proposed Action for which an EA was prepared in July 1984. There was substantial opposition to this proposal by neighboring homeowners, the City of Los Angeles, and the California Department of Parks and Recreation. The California Coastal Commission voted unanimously that this Proposed Action was inconsistent with the California Coastal Zone Management Act. The City of Los Angeles' proposals for using BP and/or UFM and the investigation of alternative configurations on WP resulted in the preparation of the DEIS. The use of either BP or UFM will result in the displacement

of current, organized community uses of these sites as indicated in the DEIS. The USAF believes the Proposed Action in the DEIS involving 40 acres on the lower area of WP is a compromise among the interests of the various segments of the community.

80. Housing for Officers at Extreme Edge of Permitted Driving Distance from LAAFS Constitutes a Threat to Defense

The location of housing for officers assigned to LAAFS being approximately a 1-hour drive from the USAF station presents no threat to the defense of the United States. DOD housing standards provide for a maximum of 1-hour drive and 30 miles. The traffic engineering analysis described in the DEIS indicated no problems in the area.

81. Biologic Field Investigations Underestimated the Wildlife Populations

Appendix E of the DEIS listed the vertebrate wildlife species that have been observed or potentially occur at WP. As shown in Appendix E, owls, redtail hawks, pheasant, quail, and blackbirds are included. SEE RESPONSE NO. 55.

82. DEIS does not Cover the Threat to State Park Plans for WP

SEE RESPONSE NO. 10.

83. Possibility of Landslides at WP

As described in the DEIS, landslide potential at WP is minimal. Recent geotechnical surveys at WP consisted of geologic reconnaissance mapping and subsurface exploration. The subsurface exploration program consisted of excavating or drilling, sampling, and logging of a total of 173 borings and 129 test pits spaced at approximately one to three per acre. Laboratory tests were conducted to classify the materials and to estimate their physical and engineering properties. These tests included mechanical analysis, strength, compressibility, expansion, compaction, swelling pressure, and loaded swell test. The complete results of

the geotechnical investigations at WP and BP can be obtained from the USAF.

84. Reconsider Proposed Action Location; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

The USAF has considered over 45 regional and local site alternatives dating back to 1979 (SEE RESPONSE NO. 25). The DEIS (Section 3.0) discussed eight local alternative configurations and housing densities involving various size parcels on WP and the use of BP and UFM. In addition, three alternatives were discussed that would not require construction by the USAF (SEE RESPONSE NO. 22). As described in the DEIS, each of the eight alternative configurations would affect various community groups and/or the natural environment. Based on the detailed analysis of alternative configurations in the DEIS, the USAF believes the Proposed Action is a compromise among the interests of the various segments of the local community. The need to relocate the community gardens would be likely under any future change in use of WP. The community gardens possibly could be relocated to another area on WP or to another nearby city park. The feasibility study for a state park at WP did not include provisions for the community gardens in the conceptual park plan.

85. Housing Would Create Traffic Problems on Paseo Del Mar; Housing Project Would Eliminate Park

As described in the DEIS, a traffic engineering study was conducted (Appendix H of the DEIS) for the Proposed Action and alternatives. The study indicated that the additional households would create some increases in traffic on several local roads; however, the increases are expected to be minor relative to existing traffic levels and would not change the level of service on any road or intersection. Compared to the Proposed Action and other alternatives, Alternative A is expected to have a relatively lower level of potential effect on Gaffey St. and the San Pedro business

district. The Proposed Action and alternatives will not require improvements in the local roadway system except for possibly minor improvements such as turn lanes at the entrances to the potential sites. Ride sharing and use of flex-time work scheduling will be encouraged to minimize any traffic impacts. See Mitigative Measures in Section 6.13 of the DEIS. **SEE RESPONSE NOS. 6 AND 10.**

86. Consider Use of UFM, BP, or Area of WP at Western Ave. and 25th St.

Eight alternative configurations involving various size parcels of WP and the use of BP and UFM were developed and evaluated throughout the DEIS. As described in the DEIS, each of the eight alternative configurations would affect various community groups and/or the natural environment **(SEE RESPONSE NO. 38).**

87. Reconsider Proposed Action; Concern Over Loss of Community Garden

SEE RESPONSE NO. 84.

88. Recommend USAF Not Use BP Due to Loss of Existing Recreational Facilities

The alternatives evaluation criteria (Section 3.2 in the DEIS) included the provision (Item No. 4) that the candidate site is not already committed to other uses. BP and UFM were originally found by the USAF not to be viable sites due to their existing use. The inclusion of BP and UFM as an alternative site and the consideration of BP in the DEIS analysis was due to the proposal by the City of Los Angeles to use this site **(SEE RESPONSE NO. 3).**

89. Recommend That Overnight Camping Not Be Considered At WP

As described in the California Department of Parks and Recreation WP State Park Feasibility Study, overnight camping is being considered in the park plans for WP. Comments relative to allowing overnight campling at WP should be expressed to city and state officials. The USAF is not involved in the decision to allow or not allow overnight camping at WP.

90. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

91. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

Translation: English Response to Italian. SEE RESPONSE NO. 84.

Reconsiderare lo spostamento. Tempo e sforzo impiegato dei giardinieri per cultivare i giardini della collectivita

Dal 1979 la forza aerea (USAF) ha valutato piu di quaranta (40) posti al livello regionale e al livello locale. Nell'abbozzo della dichiarazione sui problemi dell'ambiente (DEIS) (Sezione 3.0) si hanno discusso otto configurazioni diverse, al livello locale, che riguardano anche la densita di case nei pezzi di terra di varia misura a White Point e anche l'useo di Beckdonovitche Point e la Riserva Superiore di Fort MacArthur. Si hanno discusso anche tre alternative in cui l"USAF non dovrebbe costruire niente. Qualsiasi alternativa avra degli effetti sia nei gruppi della colletivita sia nell'ambiente. Con fondamento nell'analisi delle possibilita presentate nel DEIS, l'USAF crede che la proposta presentata sia quella meno deleteria delle otto configurazioni descritte nel DEIS (CF. RISPOSTA 22). Sei possono spostare i giardini a un altro posto da White point o a un altro parco vicino dalla citta.

92. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

93. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

94. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

95. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

96. Justify Reversion of 40 Acres at WP in Terms of National Defense

The reversionary clause in the deed is for national defense need. This does not necessarily mean a national defense emergency. The military personnel are an integral part of the national defense, not just the weapons system. **SEE RESPONSE NO. 65.**

97. USAF Has Not Addressed the Alternative Siting Proposals and Compromises

SEE RESPONSE NOS. 25 AND 38.

98. DEIS Does Not Assess the Environmental Consequences of the Housing Project; Alternatives to Proposed Action Not Adequately Considered

SEE RESPONSE NOS. 25 AND 38.

99. DEIS Does Not Contain a Conceptual Site Plan of the Proposed Housing Development; No Clues to How Project Relates to Terrain; Effect on Visual Environment; How Access Points Relate to Traffic

SEE RESPONSE NOS. 14 AND 28.

Traffic access routes and analysis of traffic impacts for the Proposed Action and the eight alternatives are contained in the traffic engineering analysis (Appendix H) of the DEIS. The results of the traffic analysis indicated that no significant impacts would occur for the Proposed Action or the alternative siting configurations. Once the final site is selected, the design staff will coordinate with city traffic engineers to determine final ingress/egress points.

100. DEIS Rationalizes and Oversimplifies the Effect of the Proposed Housing Development on the Planned State Park at WP

SEE RESPONSE NO. 10.

101. DEIS Lacks a Convincing Evaluation of Alternatives to the Proposed Action

SEE RESPONSE NO. 38.

102. DEIS Does Not Contain a Conceptual Site Plan

SEE RESPONSE NO. 99.

103. DEIS Does Not Adequately Assess Impact of the Proposed Action on the State Park Plans

Public access currently exists to Royal Palms State Beach and White Point Beach. Approximately 1,700 visitors per day during the 1985 summer attended Royal Palms State Beach. The proposed housing project would not exclude visitors from the beaches. Currently, the upland area of WP provides no parking for beach access due to the wire fencing around the site. As described in the DEIS (p. 5-83), the area of the Proposed Action is designated in the WP Park Feasibilty Plan for a 300-car parking area following the realignment of Paseo del Mar. Parking for beach access and viewing ocean vistas could be provided in the area south of the current route of Paseo del Mar. Although this parking area would be smaller than planned in the feasibility study, it would result in an increase in available parking over that which currently exists. SEE RESPONSE NO. 10.

104. DEIS Should More Comprehensively Consider Potential Limitations That the Housing Proposal May Have Upon Potential Park Development; Compatibility Between the Proposed Housing Development and State Park; Loss of Scenic and Visual Qualities Due to the Housing on Plans to Develop a State Park

Section 5.11 (pp. 5-80 through 5-90) of the DEIS described in detail the impact that the Proposed Action and the seven alternatives would have on the proposed state park plan at WP. The impact analysis was based on the CDPR state park feasibility

study and the conceptual site plan for the state park. For each alternative parcel on WP, the DEIS (Section 5.11) described those facilities shown on the state park concept plan that would be impacted. For example, the Proposed Action is described (p. 5-83) as impacting the 300-car parking area, day-use picnic area, and some restroom facilities that were proposed for the 40-acre area in which the Proposed Action would be located. Analysis for the Alternative A housing siting (p. 5-85) showed that this alternative would impact the proposed camping area and associated vegetative buffering. Similarly, each of the alternatives were analyzed for their impacts to the state park plan. The USAF recognizes that the housing on WP will reduce the amount of land available for park development and some elimination of park facilities, as identified in the feasibility study, may occur. The housing, however, does not preclude the development of some type of city- or state-managed park at WP. **SEE RESPONSE NO. 10.**

The state park feasibility study recognized the incompatibility of the park with adjacent residential neighborhoods. The study recommended vegetative buffering to buffer the park from the surrounding residential neighborhoods to the west (across Western Ave.), to the east (across Weymouth Ave.), and the Navy housing to the north. This buffering would provide barriers for scenic and visual effects and aid in noise abatement. Similarly, vegetative buffering could be provided around the USAF housing project to provide a natural transitional area between the housing (which would be similar to the existing adjacent single-family housing) and the park development.

105. Alternative Housing Configurations Are Not Given More Consideration

Eight alternative configurations were analyzed in detail in the DEIS. Seven of the eight alternatives involved higher density development designs utilizing clustered or attached housing.

Table 3.5-1 (p. 3-2C) summarized these alternative configurations. The USAF recognizes the need to preserve open space at WP. As discussed in the DEIS, each of the alternative configurations would affect some segments of the community. For example, those groups supportive of a state park of maximum size at WP would prefer Alternative H for the housing. This alternative utilizes BP and UFM and none of WP. As described, this alternative significantly impacts the existing recreational uses of BP and UFM supported by some segments of the community. The proposed housing at WP does not preclude park development on the remaining state, county, and city land (SEE RESPONSE NO. 10).

106. Explanation of the Method of Calculation of Housing Density for Alternative A

The discussion in Section 3.5 (p. 3-19) of the DEIS explained that due to the utilization of the three relatively level natural terraces, the housing would be located in three "clusters." Although the entire parcel is approximately 50 acres, only 32 acres is "buildable," resulting in an average "net" density of 5.3 dwelling units per acre. In the Impact Analysis section, the density calculation utilized the entire parcel (50 acres). This yielded a "gross" density of 3.4 dwelling units per acre, which is comparable to the adjacent housing across Western Ave. (approximately 3.0 dwelling units per acre).

The USAF believes "net" density is the more appropriate method for expressing housing density because "net" density determines the overall visual appearance of the housing units. A correction of this "gross" density calculation for Alternative A is noted in Section 4.0 of the DEIS.

107. 100 Single-Family Lots Could Be Developed At BP With 5,000 ft^2 Lot Sizes; 134 Single-Family Lots Could Be Developed At UFM With 5,000 ft^2 Lot Sizes

SEE RESPONSE NO. 33.

108. Cost Differences Between Demolition of Facilities at UFM Versus Demolition of NIKE Facilities at WP

SEE RESPONSE NO. 17.

109. The Zoning Map of Southern San Pedro Shown in Figure 4.8-2 (p. 4-62) of the DEIS Has Been Updated. BP is Now Zoned A1-1

According to the zoning department (Ms. Gertrude Kay, personal communication, June 23, 1986), the specific plan for San Pedro primarily changed restrictions within zoning classifications, such as height restrictions, and did not have a large effect on zoning designations. BP zoning was changed to A1-1 (parks) from R1-1 (residential) to reflect the newly developed recreation facilities.

110. The Population Data Given on p. 4-65 is the 1980 Census Population, Not the 1984 Population

The figure given on p. 4-65 (62,336) is the 1980 census population for San Pedro. The correct 1984 population estimate for San Pedro is 65,083. The figure (62,004) shown in Table 4.9-1 (p. 4-66) of the DEIS should be 62,336. This figure represents an increase of 7.6 percent over the total population of 60,497 reported in the 1970 census for San Pedro. These corrections are noted in Section 4.0 of this FEIS.

111. The Terminal Island Treatment Plant Provides Secondary Treatment

This Terminal Island Treatment Plant, a wastewater facility operated by the City of Los Angeles, is discussed on pp. 4-90 and 4-92 of the DEIS. The plant is a secondary treatment facility rather than a primary treatment facility, as indicated in the DEIS. This correction is noted in Section 4.0 of this FEIS.

It is also noted that the existing Navy housing at WP is served by Los Angeles County Sanitary District No. 5 and the Joint Water Pollution Control Plant.

112. Sewerage Service Is Not Provided By the County For BP or UFM

Sewerage service at BP and UFM are discussed in the DEIS on pp. 4-95 and 4-98, respectively. These two sites are served only by the City of Los Angeles system and the Terminal Island Treatment Plant and are not within the Los Angeles County Sanitary District No. 5 area. This correction is noted in Section 4.0 of this FEIS. Figure 4.12-2 is correct, as shown in the DEIS.

113. DEIS Gives Little Substantive Consideration to Alternative Housing Sites or Densities

In Section 3.4 of the DEIS (pp. 3-8 through 3-19), more than 45 alternative sites have been evaluated for feasibility of constructing military housing dating back to the late 1970s. **SEE RESPONSE NOS. 25 AND 38.**

114. Use of WP for Housing Would Eliminate Any Opportunity for a City or State Park

The construction of USAF housing does not preclude park development of the remaining combined 124 acres of oceanfront and upland areas at WP. **SEE RESPONSE NO. 10.**

115. The Proposed Plan of the City of Los Angeles Designates WP as a Recreational Area

SEE RESPONSE NO. 10.

116. Reconsider Proposed Action Location; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

117. Reconsider Proposed Action Location; Concern over Loss of Community Gardens

SEE RESPONSE NO. 84.

118. WP is the Only Remaining Undeveloped Coastal Property in Los Angeles County

SEE RESPONSE NO. 49.

119. No Open Space will Remain; Open Space will be Replaced by Institutional Housing

SEE RESPONSE NO. 10.

120. No More Military Housing Units in San Pedro

SEE RESPONSE NO. 25.

121. USAF Housing is Fenced and Public is Excluded; Questions Reversion of the Property Due to National Defense

The housing development would be fenced for security purposes. In addition, vegetation would be included in landscaping plans to provide a scenic buffer between the 40-acre development and the remaining 75 acres of WP. The fencing around the housing development would not affect public access to the 75 acres at WP, or the combined 49 acres at Royal Palms State Beach, the county property along the coast at WP, and the upland county land south of Paseo del Mar. Currently, public access to WP is limited because the entire 115-acre parcel is fenced and has locked gates. As previously indicated, military personnel are an integral part of national defense (SEE RESPONSE NO. 65).

122. Traffic Would Become Congested if the 170 Housing Units are Constructed

A traffic engineering impact analysis was performed (see Section 5.13; pp. 5-101 to 5-110 in the DEIS). The traffic analysis indicated that although the housing development would create some increases in traffic on several local arterial roadways, the increases will be insignificant. A maximum increase of 2.9 percent would occur on Gaffey St. between 1st St. and the entrance to the Harbor Freeway. SEE RESPONSE NO. 6.

123. Natural Science Educational Resource Would be Eliminated

The proposed housing development would be located in the area of WP that is occupied by the former NIKE facilities. The construction of these NIKE facilities, including launchers and underground missile storage silos, initially disturbed the natural environment

at WP. In addition, disking of the site for fire control has disturbed natural vegetation and reduced animal habitats on the site. The housing development on the lower 40 acres would not impact the remaining 75 acres of upland WP, including the sloped areas upper terraces. In addition, the oceanfront areas contain tidal pools, and the overlooking bluffs south of Paseo del Mar would not be impacted. Approximately 124 acres of combined oceanfront and upland area would still be available for natural science field trips by local schools.

124. The Palos Verdes Blue Butterfly will have Lost its Natural Habitat

The Proposed Action siting does not include the area of WP which contained the Astragalus foodplant. As indicated in the DEIS (Section 4.4; p. 4-29 to 4-39) only three Astragalus plants have been identified at WP since spring 1985. One of these plants died before field studies were initiated in December 1985 for preparation of this DEIS. A second plant died before follow-up field studies were conducted in late February 1986. The remaining plant produced leaflets on approximately six branches, but did not flower in 1986. This plant subsequently died sometime between the Febrary-March and May 1986 surveys. At this time, there are no specimens of Astragalus growing at WP. The most significant Astragulus resources near WP are at UFM (15 plants) and at Friendship Park (approximately 100 plants). SEE RESPONSE NO. 183.

125. Ballfields at BP Could be Relocated at Angels Gate Park

SEE RESPONSE NO. 3.

126. Consider the Navy-Owned Land Between the Rancho Verde Raquet Club and the Navy Housing on Western Ave.

This parcel of land was included in the alternative analysis in the DEIS (Section 3.4.15.2; p. 3-16). The area is on Western Ave. between John S. Montgomery Drive and Westmont and is adjacent to existing Navy housing. It is a 5-acre site with a large drainage

channel running through the property. The site is too small for the proposed housing, and the cost to develop would be high due to constraints associated with its topography; therefore, its use for the Proposed Action is not feasible.

127. USAF Should Purchase Homes in the Private Sector

SEE RESPONSE NO. 66.

128. What Assurance Does the Community have that all the Remaining Area will not be Reverted?

SEE RESPONSE NO. 67.

129. Consistency of Proposed Action with Regional Air Quality Plans

The Southern California Association of Governments (SCAG) was contacted during preparation of the DEIS (Ms. W. Murphy, personal communication Feb. 14, 1986) to determine if the Proposed Action is consistent with regional air quality plans. SCAG indicated that its policy is to review residential developments of 500 dwelling units or greater, a threshold standard below which projects are considered regionally insignificant. The Proposed Action includes only 170 units. A copy of the DEIS was submitted to SCAG; no comments have been received.

The SCAG Air Quality Management Plan is a joint product of the South Coast Air Quality Management District (SCAQMD) and SCAG. SCAQMD publications and data were primary sources of information for the air quality analyses presented in the DEIS (Section 5.5, pp. 5-32 to 5-45). The air quality impacts were determined to be insignificant, as presented in the DEIS.

130. Explain Specific Methods Which will be used to Promote Transit, Vanpools, and Retrofit of Out-of-State Vehicles; give the Target Rates for Participation

The USAF and Aerospace Corp. maintain a computerized system ("Commuter Computer") for matching drivers and passengers for vanpools, carpools, etc. Newsletters and information packets are

published for distribution to new military members to make them aware of carpools and the retrofit of out-of-state vehicles.

The location of the housing in a single development and the similar workplace (LAAFS) for the housing occupants maximizes the feasibilty of ride sharing, vanpools, etc.

Statistical data for the recently completed USAF housing at MFM in San Pedro indicate that 75 percent participate in vanpools, carpools, etc.; 10 percent use the bus; and 15 percent drive. Similar distributions are anticipated for the proposed 170-unit housing development.

131. Make Contact with the U.S. Fish and Wildlife Service Regarding Federally Protected Species in the Project Area

The Palos Verdes blue butterfly, a federally listed endangered species, has been known to exist in the Palos Verdes Peninsular area. As indicated in the DEIS (Section 4.4; p. 4-32), evidence of the butterfly has not occurred since 1983. The U.S. Fish and Wildlife Service (Laguna Niguel, CA) has received a copy of the DEIS for review. SEE RESPONSE NO. 124.

132. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

133. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

134. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

135. Reconsider Proposed Action; Gardeners Have Spent Time and Effort Cultivating the Community Gardens

SEE RESPONSE NO. 84.

136. Concern Over Community Garden; the USAF Should Select Alternative "A"

SEE RESPONSE NOS. 79 AND 84.

137. The DEIS does not Adequately Consider Alternatives; Does Not Adequately Consider the Impacts at WP or BP

SEE RESPONSE NO. 75.

138. USAF Should Consider Using the VA Hospital Land for Construction of Housing

The General Services Administration (GSA) is seeking to sell a portion of the VA Hospital land (109 acres) to a private developer for an estimated $350 million as called for in the Fiscal 1987 budget. As described in the DEIS (p. 3-11), the VA land was a gift from an individual with the stipulation that if the VA had no use for the land, it would revert back to the original owner. The heirs of the families whose ancestor donated the land for the hospital in 1888 have indicated that they plan to oppose the sale legally. In addition, four members of the California Congressional delegation testified against the proposed sale to the house Veterans Affairs Oversight and Investigations Subcommittee. Due to the unresolved legal question of whether the VA has clear title to the land and the fact that the housing appropriation from Congress specifically did not include funds for land acquisition, the VA property is not a feasible alternative.

139. Demolition of Structures at UFM may be no more Difficult than Demolishing the NIKE Facilities at WP.

SEE RESPONSE NO. 17.

140. USAF does not Address the Issue that Housing Construction Would Prevent the Establishment of a State Park

SEE RESPONSE NO. 10.

141. If the Housing is Constructed at BP, USAF Should Pay for Replacement Ballfields

SEE RESPONSE NO. 3.

142. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

143. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

144. USAF Housing and a Park Can Coexist; Need to Delete Reversionary Clause

SEE RESPONSE NOS. 10 AND 67.

145. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

146. Traffic Impacts are Expected to be Minor

As described in the traffic impact analysis in the DEIS (Section 5.13), the maximum increase on Gaffey St. between 1st Ave. and the entrance to the Harbor Freeway will be an insignificant 2.9 percent. Carpooling and flextime work scheduling are anticipated, as practiced by USAF personnel currently in the USAF housing at MFM in San Pedro. **SEE RESPONSE NO. 130.**

147. State Park May Impact Local Population by 40 to 70 Percent

The impacts (including population impacts) associated with the development of a State Park at WP would be assessed in an environmental analysis report specific for the proposed park. The environmental analysis associated with the development of a State Park has not yet been performed.

148. Crime on Existing Beaches is Minor Due to the Beaches Being Declared "Neutral" Territory; Concern Over Security at a State Park

The Harbor Division of the Los Angeles Police Department has expressed that the reporting district which includes WP has one of the highest crime rates in the division. Yet, the police have stated that they have few formal reports of criminal activity at Royal Palms State Beach. Thus, while the district has a high crime rate, it is not directly attributable to activity at the beach.

As stated in the DEIS (p. 5-89), the USAF housing development will have 24-hour security whereas the State Park would not necessarily have 24-hour security. The concern over security at the proposed State Park would need to be addressed in an environmental impact analysis for the State Park.

149. Concern Over Noise that Would Be Associated with a State Park

The impacts due to noise generation associated with State Park development at WP would be assessed in an environmental impact analysis specific for the proposed park. This analysis has not yet been performed.

150. The Potential for Toxic Materials at the Site Should Be Studied; Cleanup Funds, if Necessary, May Be Hard to Obtain; Failure to Secure Funds Would Leave the Site in a Toxic State

SEE RESPONSE NO. 61.

151. Funding for Relocation of the BP Ballfields

SEE RESPONSE NO. 3.

152. USAF was Ordered to Prepare an EIS During Court Proceedings Related to the USAF's Right-of-Entry to Conduct Geotechnical Investigations

During June, July, and August of 1985, Assistant Undersecretary Boatright requested from the City of Los Angeles (represented by Councilwoman Flores) a number of times right-of-entry to WP in

order that the USAF could conduct geotechnical surveys of the area to assist in determining those areas that were buildable. This information was required in order to respond to the city's proposals concerning various configurations of WP and BP. The city refused to grant this entry and the USAF condemned the property for right-of-entry for a 4-month period to conduct the necessary surveys. The city challenged the action in court. The court did not find sufficient cause to allow the city to block the survey and granted the USAF's entry. At no time during the proceedings was the USAF ordered to prepare an EIS.

153. USAF is no Longer Seeking a Compromise Position with the City; Negotiations Have Ended

Negotiations are continuing between the USAF, the city, and the State Department of Parks and Recreation. A series of meetings which began in April 1986 are progressing. The USAF's Proposed Action is for construction of all units on 40 acres of WP. There are advantages with one site both for the USAF and the city.

1. No existing recreational uses would be displaced and require relocation; and
2. The construction, maintenance, and security cost will be lower for one site versus a split site.

154. USAF Attempting to Provide Residential Amenities at WP by Providing Large Lots, Spectacular Views, and a Private Recreational Area

The USAF is responsible for providing quality of life features for its personnel housed in government-owned housing. This includes recreational facilities such as athletic areas and children's play yards. Such features are included in the Request for Proposal submitted to contractors for their inclusion as funding allows. The size of lots provided is a function of the overall acreage. The Proposed Action of 40 acres at WP results in gross lot size of approximately 8,200 ft^2. This does not take into account all provisions of the Proposed Action:

1. The 40 acres included buffer areas to screen the housing from the future park use and vice-versa as a part of the area to be reverted. This was included so the USAF was ensured that adequate buffering would be provided.
2. The USAF will have only one access road from the site onto Paseo del Mar for security control and due to traffic along Paseo del Mar. This requires a looping road system that takes extra acreage to provide. These two factors result in lots sizes smaller than 8,200 ft^2.

The city zoning in the area has a minimum of 5,000 ft^2 lots. Zoning regulations provide a minimum lot size, and there is no requirement to build to the minimum. Zoning only provides for a minimum that can not be exceeded. The decision to construct single-family homes at a density compatible to the adjacent residential neighborhoods is based upon the Mayor's Advisory Committee on Military Housing in San Pedro (May 1982) and Councilwoman Flores indication in October 1983 that single-family homes were supported by the community. Although certain segments of the community may now support higher densities, multi-family, attached housing may be perceived by other segments of the community as possibly reducing adjacent land value.

155. USAF has not Provided Site Plans; Not Responded to Site Plans Prepared by the City of Los Angeles

SEE RESPONSE NO. 14.

156. USAF's Need for 16 Acres at WP is Based on Providing Amenities for USAF Personnel

The USAF's need for a 40-acre single site or a 16- and 16.5-acre split site is not a function of providing amenities for personnel. As described in the DEIS, the Proposed Action was selected because it met all evaluation criteria. The selection of this site would displace fewer users than BP or UFM and, therefore, represented a

compromise among the interests of the varying community segments. The combined WP, Royal Palms State Beach, and County of Los Angeles property south of Paseo del Mar covers 164 acres. If the Proposed Action of 40 acres on WP is implemented, 124 acres for park development remains. If the split site of 16 acres at WP and BP is chosen, 148 acres for park development remains.

The USAF believes that recreational development of the area is not dependent on the participation of the State Parks and Recreation Department. There are no data that demonstrate that the state or city could not develop the remaining acreage as a viable adjunct to the existing beach recreational area. The State Park system has other recreational designations that appear to more closely fit the WP beach recreational area.

157. WP is a 145-Acre Shorefront and Upland Site; Adjacent Development is Virtually Invisible

Only a small portion of the former WP NIKE Battery is shorefront property and this portion is controlled by the County of Los Angeles and the State of California at Royal Palms Beach. The development of a portion of WP by the USAF for housing will not have any effect on the shorefront portion of the property. The upland area of WP is comprised of two marine terraces and a connecting slope. WP is in an urban residential area and surrounded on three sides by typical single-family residential development. From a few locations on WP, other surrounding development may be screened by topographic slopes. These locations, however, are limited and would provide this isolated type of experience for only a few individuals at a time.

158. USAF Housing is not Justifiable as a National Defense Need

SEE RESPONSE NO. 65.

159. The Coastal Act Provides that Lower Cost Visitor and Recreational Facilities Shall Be Protected; Upland Areas Shall Be Preserved; Oceanfront Land Shall Be Protected for Recreational Use; Scenic and Visual Qualities Shall Be Protected

Federal agencies are directed to give appropriate weight to the various types of provisions within the Coastal Management Plan [15 CFR 930.39 (c)]. The agency must ensure that its activities are consistent to the "maximum extent practicable" with the enforceable mandatory policies of the plan. However, the agency need only give adequate consideration to provisions of the plan which are in the nature of recommendations.

Section 30213 of the California Coastal Act (California Public Resource Code, Division 20) is in the form of a recommendation when it states that, "Lower cost visitor and recreational facilities shall be protected, encouraged, and where feasible provided....public recreational opportunities are preferred." As stated in the DEIS and Consistency Document, the Proposed Action does not preclude the development of lower cost visitor recreational facilities on the remaining acreage of WP, Royal Palms Beach, and the county land south of Paseo del Mar (124 acres combined). The agency is required by 15 CFR only to adequately consider this aspect. Because such park development would not be precluded, the USAF has met this requirement. The development of housing and a park are not mutually exclusive and meets the "balance" approach recommended by both the Federal and state coastal acts.

Section 30223 of the California Coastal Act states that, "Upland areas necessary to support coastal recreational use shall be reserved for such use, where feasible." Again, this is in the form of a recommendation when the term "where feasible" is used.

The DEIS and the Consistency Document indicated that such upland development would not be precluded and that the housing and the park can be developed in a balanced approach that meets the needs of both interests.

Section 30221 of the California Coastal Act deals with oceanfront land suitable for recreation. The proposed USAF housing does not affect oceanfront property. The upland area of WP and the oceanfront area are divided by Paseo del Mar and a steep beach bluff. Both conditions divide the property into oceanfront, which is currently controlled by the state and the county and for which the Proposed Action will not affect, and the upland areas landward of Paseo del Mar and the beach bluff. The DEIS and the Consistency Document support the position that USAF housing does not encompass areas associated with oceanfront use or water-oriented recreational use.

Section 30251 of the California Coastal Act deals with scenic values. It is in the form of recommendations when it states that, "..visual qualities of coastal areas shall be considered and protected as a resource...," and "..to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas..." It does state that, "New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local governments shall be subordinate to the character of its setting." The USAF housing site considers these factors, as documented in the DEIS and the Consistency Document. The CCC and the city both objected to the original 50-acre site on the basis that it would degrade the scenic quality of the area. Recognizing this concern, the USAF agreed with the proposal of the city to evaluate the flat area along Paseo del Mar. This location, as indicated in the DEIS, is not visible from the beach due to the cliffs and is out of view of

the houses along Western Ave. due to the steep terrace along Western Ave. Although it may be visible from further out to sea, it will appear as only an extension of the existing residential neighborhoods. The steep terrace along Western Ave. would be retained for scenic overviews of the coast and ocean if the Proposed Action siting is implemented.

160. The USAF Housing Would Effectively Eliminate the California Department of Parks and Recreation's Ability to Develop a Park of Statewide Significance at WP

SEE RESPONSE NO. 10.

161. Even in the Present Undeveloped State, the Land at WP Provides Much Needed Urban Open Space and Dispersed Recreational Opportunities

As indicated in the DEIS, no recreational development of WP by the city has occurred as was required in the transfer deed. The 115 acres of upland land at WP provides limited open space or recreational value at the present due to fencing and locked gates. The only organized uses are a community garden used by a limited number of people and field trips by local school students. The other use (uncontrolled) is by people willing to pass through holes in the fence.

162. The Upland Area of WP Serves as a Support Area for Existing Public Beaches at WP

The upland area on the county land south of Paseo del Mar contains recreational facilities that are not coastal-oriented (i.e., baseball fields) and are in poor condition. This area is also used for vehicle parking and for ocean viewing. The Proposed Action does not involve this area of WP. As stated in the RESPONSE NO. 161, the upland area of WP north of Paseo del Mar (city-controlled land) is fenced and has locked gates. No coastal-oriented recreational facilities have been developed, and because of the fence, no parking is provided in support of the public beaches.

163. The Reversion of Land Will Set a Precedent for Incremental Loss of Park Area

The USAF has stated that it would support the city's effort to have the reversionary clause removed from the deed of transfer (SEE RESPONSE NO. 67).

164. The Proposed Development Would Be Highly Visible; One of the Main Attractions of the Site is that Adjacent Housing is Invisible from Much of the Frontal Slopes

The housing along Western Ave. (west of WP) is invisible from much of the lower elevations on WP due to the steep terraces along Western Ave. This is shown in photographs in Appendix E (e.g., p. E-21) of the DEIS. However, the housing to the east of the site along Weymouth Ave. is visible from all the frontal area of WP. This is shown in the photographs on pp. E-22, E-24, and E-25 in Appendix E of the DEIS. The objections by the City and the California Coastal Commission to the visual impacts of the original siting of 50 acres on the steep terraces along Western Ave. resulted in the Proposed Action on 40 acres in the lower area of WP.

165. If Overall Remaining Acreage of WP is Decreased to Less Than 100 Acres, No Space Would Remain for Providing Physical and Visual Buffering the Camping Area from Residential Uses

SEE RESPONSE NO. 10.

166. The Entire WP Site May Eventually Be Reverted if the USAF Is Allowed to Exercise the Reversionary Clause

SEE RESPONSE NO. 67.

167. Site is One of the Few Shoreline Areas Suitable for Enhancing Coastal Recreation; Presently Provide Recreational Use for Hikers, Ocean Vistas, and a Physical Access Connection Between Upland Development and the Sea; Housing Construction will have Adverse Impact on Public's Use of the Beach

SEE RESPONSE NOS. 10, 49, AND 193.

168. Scope of Alternatives is Limited; Lack of Detail Regarding Specific Design; No Analysis of Various Development Scenarios

SEE RESPONSE NOS. 10, 14, 22, 25, AND 28.

169. No Analysis of Alternative Development Configuration or Alternatives to Construction

SEE RESPONSE NOS. 10, 14, 22, 25, AND 28.

170. Cost of Demolition of Facilities at UFM not Included in DEIS

SEE RESPONSE NO. 17.

171. Alternatives Considered in the DEIS Were Limited to Those Involving Land with Federal Ownership

SEE RESPONSE NO. 25.

172. Existing Zoning Would Allow Higher Densities than Were Considered in the Alternatives

SEE RESPONSE NOS. 33 AND 34.

173. 104 Single-Family Units Could be Developed at BP with 5,000-ft^2 Lot Sizes

SEE RESPONSE NO. 35.

174. 47 Housing Units Could be Located at WP on the 9 Acres Suggested by the City of Los Angeles

The 9-acre parcel of WP offered by the city is in the extreme southeast corner of the site and includes part of the steeply sloped area between the relatively flat terraces. This results in only 5 or 6 acres that are actually buildable yielding a "net" density of 8 to 9 units per acre. This would require multi-family housing, which is not compatible with the adjacent neighborhood (single-family units at a density of 4.7 units per acre). Multi-family housing could be perceived by some members of the community as potentially lowering property values.

175. USAF Should Consider a Continuation of the Housing Allowance and Purchase or Renting of Homes; Decrease in Morgage Rates Improves Feasibility of Purchase

Section 1.3 (p. 1-3) of the DEIS discusses the Congressional limits on BAQ, VHA, and MAHC and the resulting shortfalls between housing allowance and cost of housing. As discussed in the DEIS, USAF officers are currently experiencing a $500 to $600/month out-of-pocket housing shortfall which results in acceptance of substandard housing or driving long distances. The housing allowances (BAQ and VHA) are currently being utilized to support USAF personnel who are not housed in the 370 units of military housing at MFM and who have to acquire housing in the private sector. The BAQ and VHA are set by Congress and can only be increased by Congress. This housing allowance will continue to be utilized by USAF personnel that do not reside in the government housing at MFM or the proposed additional 170 housing units.

Mortgage and equity accrual rates fluctuate with time, dependent upon changing economic conditions. The USAF had identified a need for housing in the mid-1970s. Since that time, mortgage rates have fluctuated drastically and likely will continue to fluctuate through the planned useful life span of the proposed housing units. The military personnel who will occupy the housing units are rotated on assignment such that a number of officers will occupy the homes during the planned useful life of the units. Officers assigned to LAAFS 5, 10, or 20 years from now will need housing and will likely be subject to mortgage rates different than in 1986. Construction of these units will eliminate the need for military personnel to purchase housing in the private sector and endure financial hardships associated with the times when mortgage rates are high.

176. DEIS Fails to Address the City of Los Angeles Proposal

SEE RESPONSE NOS. 14 AND 30.

177. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

178. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

179. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

180. Reconsider Proposed Action; Concern Over Loss of Community Gardens

SEE RESPONSE NO. 84.

181. "Accommodate or Explain" Response by USAF is in Effect for the Office of Planning and Research State Clearing House

The FEIS and Record of Decision for the Proposed Action will meet the requirements of the Office of Planning and Research "accommodate or explain" consensus.

182. Impacts of the Project on the Palos Verdes Blue Butterfly and its Host Plant, Astragalus

SEE RESPONSE NOS. 124 AND 183.

183. Screening of Host Plants for the Presence of the Palos Verdes Blue Butterfly

After an exhaustive search of the entire WP site during December 1985, only two specimens of the Astragalus foodplant were observed growing there. As indicated in the DEIS, these plants are not located on the parcel of WP which is the Proposed Action. In December 1985, both plants were senescing and producing very little vegetation. One of the plants died before field studies were conducted in late February and March 1986. The remaining plant produced leaflets on about six branches, but did not flower in 1986. It subsequently expired sometime between the March and May 1986 surveys of WP. At this time, there are no specimens of Astragalus trichopodus growing at WP.

Adult females of the endangered Palos Verdes blue butterfly lay their eggs on flowers of the Astragalus, and Palos Verdes blue butterfly larvae feed only on the developing flowers and seedpods of this legume. Since the lone remaining Astragalus plant at WP did not produce any flowers or seedpods during 1986, this plant could not have supported any individuals of the endangered butterly during this year. To confirm this, Dr. Arnold carefully monitored this plant on several occasions during the butterfly's 1986 adult flight season and larval development period. Despite intensive searches, no life stages of the endangered butterfly were observed at WP in 1986.

During 1983, 1984, and 1985, only three mature Astragalus plants were observed at WP. No seedlings were produced during this period, probably due to the extensive ground cover of weeds and annual grasses, which quickly outcompete Astragalus seedlings. As the remaining Astragalus plants died during this year without producing any seeds, it seems unlikely that the Astragalus will be able to naturally re-establish itself at WP. It might be possible to re-establish Astragalus, if the weeds and annual grasses were properly managed. Lacking such direct intervention, the WP site will likely be unable to support the Astragalus and Palos Verdes blue butterfly in the near future.

Based on these findings, the USAF will prepare and submit a "no jeopardy" opinion on the Palos Verdes blue butterfly which will complete Section 7 consultation with FWS in accordance with the Endangered Species Act of 1973.

184. Protection of Areas Having the Potential for Restoration and/or Rehabilitation of Astragalus

The last remaining Astragalus plant on WP has expired. No Astragalus resource currently exists at WP. If Astragalus is to reestablish itself on WP, direct intervention would be required, and the area of restoration would need regular maintenance (e.g.,

cultivation, weed control, urban runoff protection, etc.). As indicated in the DEIS (Section 5.4; p. 5-23), the Proposed Action location would not impact sloped areas of WP, which are the most suited to the growth of Astragalus. SEE RESPONSE NO. 183.

185. The DEIS Inappropriately Discusses Impacts Associated with the Development of a State Park at WP

The DEIS not only provided impact analysis of the Proposed Action and alternatives on the existing environment but also analyzed the cumulative impact of the USAF housing on projects under construction or planned for the area. Analysis of cumulative impacts was raised as an issue during the public scoping process. Table 5.13-3 and Figure 5.13-3 (pp. 5-109 and 5-110) in the DEIS list the projects recently completed or proposed in the San Pedro Area. The development of WP into a State Park is one of the projects planned for the area. The state's environmental analysis will examine impacts and issues associated with the development of WP into a State Park. The DEIS did not comprise an environmental assessment of park development at WP, it analyzed the cumulative impacts to the area of both the USAF housing and park development, the coexistence of which is a viable possibility.

186. The DEIS Fails to Acknowledge or Address Recreational Deficiencies Identified by Both State and Federally-Sponsored Recreational Studies Within the Los Angeles Coastal Zone

Personal communications with the Department of Parks and Recreation-Planning Division (Jack Bechtel, June 23, 1986) indicate that recreational deficiencies are determined by using a recreation demand model. The results of the model indicate that WP is in one of the highest recreational demand areas in the state. The model results for Los Angeles County in 1980 indicated that the camping demand in the area was 9,900 camping spaces. In 1980, only 2,000 camping spaces existed in the county; therefore, 7,900 additional spaces were needed. According to the model results, 13,000 camping spaces would be needed in Los Angeles County by 1990. No information was available on the number of camping spaces that exist in 1986.

187. DEIS Makes an Inconsistent Statement About Crime at Royal Palms State Beach

SEE RESPONSE NO. 148.

188. If 50 Acres of the Site Were Converted to Military Housing, It Would Preclude the State Department of Parks and Recreation Ability to Develop a Park of Statewide Significance

SEE RESPONSE NO. 10.

189. Five of the Eight Alternative Configurations are Rejected by the USAF Suggesting a Less Than Objective Evaluation; City of Los Angeles Proposal is a Suitable Resolution of the Competing Land Use Proposals

SEE RESPONSE NOS. 10 AND 14.

190. Data Used for Alternative D Appear to be Incorrect

SEE RESPONSE NO. 14.

191. Why is White Point the Only Site Remaining Out of 40 Possible Choices

SEE RESPONSE NO. 25.

192. No Other Combination of the Alternative Sites That Would be Suitable

The DEIS considered seven alternative configurations (Alternatives B through H) that involved split sites among WP, BP, and UFM. As described in the DEIS, the displacement of current recreational users of BP and UFM, and the high cost of demolition of existing buildings and the underground tunnel system at UFM adversely affect the potential for use of these sites.

193. DEIS Does Not Discuss WP as an Educational Resource; Use of WP by the Magnet School for Science Field Trips

The DEIS indicated on p. 4-81 that nature field trips are conducted at WP for schools and other groups. The magnet school conducts field trips at WP as part of its science curriculum. During the approximately 4 years the school has been in existence,

classes have visited the oceanfront tidal areas approximately monthly and the upland portions of WP approximately 2 to 3 times each semester (Mr. Dennis Weyrauch, personal communication, June 3, 1986).

The Proposed Action will not interfere with the school's use of the oceanfront tidal areas controlled by the state and county, the existing upland county property south of Paseo del Mar, or the 75-acre upland area of WP controlled by the city and not included in the proposed residential development. The latter area is currently fenced, although access is available to the school. The remaining 124 acres of combined state, county, and city property at WP could be developed as a park or maintained as a natural area in conjunction with the Proposed Action. The school's use of this property for nature field trips would not be affected by the Proposed Action. It should be noted that the Proposed Action siting is in the area of WP that is occupied by the former NIKE launchers and support facilities and the community gardens. This area would have less value for nature studies than the open, undeveloped portions of WP. Discussion of the park development alternatives for the remaining areas of WP and the Royal Palms State Beach is included in Section 5.11.1.2 of the DEIS. SEE RESPONSE NOS. 10 AND 123.

194. Consider Rise of the VA Hospital Land in Brentwood for USAF Housing Through a Use Permit with the VA

SEE RESPONSE NO. 138.

195. Federal Government Not Subject to NEPA--Nice that USAF Believes the Housing Project is Worthy of Environmental Review

SEE RESPONSE NO. 60.

196. Initial Assessment of Toxic/Hazardous Materials at WP

SEE RESPONSE NO. 61.

197. Imperative that Soil and Water Sampling be Performed at WP; Seven Military Bases in California are Either on or Proposed for Inclusion on the NPL

SEE RESPONSE NOS. 62 AND 63.

198. A Complete RI/FS Should Be Conducted in Accordance with EPA's Published Guidelines

SEE RESPONSE NO. 64.

199. Why is This a National Defense Project

SEE RESPONSE NO. 65.

200. Why Not Purchase Housing Open Market; Why Must Officers Live in Close Proximity to Each Other

SEE RESPONSE NO. 66.

201. What Assurance is There that the USAF Will Not Revert the Additional Land at WP in the Future

SEE RESPONSE NO. 67.

202. Why Can't There Be a Housing Density Exception for the USAF

SEE RESPONSE NO. 68.

203. Why Couldn't the USAF Buy a Condominum Project

SEE RESPONSE NO. 66.

204. DEIS Did Not Describe the Cumulative Impacts of Militarization of the San Pedro Community; Effect of Transience of Military Personnel on Services

SEE RESPONSE NO. 69.

205. Reasons for Constructing Offbase Housing Are Unclear; Comparative Analysis of Construction Costs Versus Cost of Purchasing in the Civilian Sector

SEE RESPONSE NOS. 66, 70, AND 71.

206. Introduction of Legislation for State Appropriation to Cover Price Differential of Housing Construction Cost Versus Civilian Market Costs

Assemblyman Elder has introduced a bill that would provide for additional funding for the State Park. Additional funding was proposed because development of a State Park at WP was going to require more money than was originally projected. The bill currently is in the Water, Parks, and Wildlife Committee of the State Assembly and is not scheduled for hearing. With the emergency clause, it could be scheduled at any time the legislature is in session. The bill does not provide funds to pay the differential between the congressional appropriation for the USAF housing and the open market price (Mr. Nathan Manske, Personal Communication, June 23, 1986).

207. Alternatives Involving BP Are Not Consistent with the Best Interests of San Pedro

The analysis in the DEIS of BP as a potential site for housing was due to the city of Los Angeles' proposal. The city offered BP to the USAF to minimize the amount of land used for housing at WP. BP was originally determined by the USAF not to be a viable site due to the development of soccer and baseball fields and the intensive use of these fields by the community (SEE RESPONSE NO. 3).

208. The City of Los Angeles Is Disappointed That the USAF Gives Very Little Attention to Alternative Housing Sites, As Well As Housing Design and Density

SEE RESPONSE NOS. 25 AND 105.

209. Significant Use of WP for Housing Would Eliminate Any Opportunity for a City or State Park

SEE RESPONSE NO. 10.

210. The Proposed San Pedro Specific Plan and the City of Los Angeles Designates WP as a Recreational Area

The current recreational opportunities at WP are limited due to the fencing and locked gates. There has been little recreational development of WP by the city as required in the transfer deed. The only development at WP has been the establishment of a community garden which could be relocated to another area on WP at minimal expense or disruption to users. The proposed housing will not eliminate the use of the remaining 124 acres of state, city, and county land as a recreational resource. SEE RESPONSE NO. 10.

211. USAF Should Follow the Direction of Congress as Indicated in the Appropriation and Work With the City to Resolve This Issue

SEE RESPONSE NOS. 13 AND 153.

212. DEIS Only Addresses Local Regional Recreational Needs Not State and National Recognized Outdoor Deficiencies

SEE RESPONSE NO. 186.

213. DEIS Gives Distorted View of Capabilities of the State Park System; No Such Thing as a Regional State Park

SEE RESPONSE NO. 10.

214. Many Types and Sizes of State Park Units; "State Parks" by Definition Consist of Relatively Spacious Areas

SEE RESPONSE NO. 10.

215. DEIS Fails to Acknowledge the City of Los Angeles' Offer on 9 Acres at WP

SEE RESPONSE NOS. 14, 30, AND 38.

The city has offered 9 acres at WP and 22 acres at BP; however, there are not 31 acres available for construction. The city indicates that only 5 or 6 of the 9 acres offered at WP are on level terrain and are buildable, and the geotechnical surveys of

BP indicate that only 16.5 acres are buildable. Therefore, although the city's proposal for this alternative as a split site requires reversion of 31 acres, only 21 or 22 acres are buildable.

216. The DEIS Neglects to Provide the Land Use Standard Used in Evaluation of Alternative Sites

Compatibility with adjacent land use was one of the five criteria used to evaluate the feasibility of constructing the housing on alternative sites. These criteria are listed on p. 3-5 of the DEIS. The USAF expressed nonconcurrence with the use of 9 acres at WP due to incompatibility of density with adjacent existing neighborhoods (Table 3.5-1; p. 3-20 of the DEIS). The Proposed Action was selected in order to construct the housing development in a manner compatible with existing adjacent density.

217. The DEIS Fails to Acknowledge That Paleontological as Well as Archaeological Mitigation Would Be Required Regardless of Which Site is Chosen

The DEIS acknowledged that archaeological/historical surveys were being performed and that preliminary results from these surveys have identified potentially significant sites on the Proposed Action and each of the alternatives that would require mitigation. Table 2 (pp. vii to ix) depicted the relative level of impacts associated with the Proposed Action and the eight alternatives on paleontological, archaeological, and historical resources. Section 3.6 (pp. 3-32 to 3-49) described these impacts. As indicated in the DEIS, alternatives involving BP (B, C, D, and H) have a higher level for impact on paleontological resources due to the shallow depths of the Altamira Shale Strata as described on p. 3-46 and shown in Table 2 (p. viii) of the DEIS. The Proposed Action and Alternatives C and F are considered to have relatively higher levels of potential impacts on potentially significant historical/archaeological sites.

Mitigative archaeological/historical measures were described in Section 6.14 (pp. 6-9 to 6-10 of the DEIS). These measures include coordination with state and Federal agencies, monitoring of surface cutting activities, and development of contingency plans in the event of an emergency discovery of a site during construction. SEE RESPONSE NO. 1. Section 6.3 (p. 6-3) of the DEIS summarized mitigative measures to minimize adverse impacts on potential paleontological resources. These included monitoring by a qualified paleontologist of all surface cutting activities that will cut into the Altamira Shale and provisions for halting or redirecting surface grading activities in the event significant fossils are identified.

218. Concern for Protection of WP as Part of the Pacific Flyway for Migratory Birds

Although bird migration may be observed throughout much of the State of California, the majority of migratory activity occurs along well-defined corridors. Migration corridors may include coastlines, mountain ridges, valleys, and riverbottoms. These physical features provide landmarks for visual orientation and supply important resources such as food, water, and protective cover.

Major corridors in California include the eastern edge of the Sierra Nevada Mountains, the Central Valley area, and the Pacific Coast (see Figure 3-3). The WP area of Southern California is not within a major corridor used by land birds. Shore birds and pelagic (open ocean) species found on the Pacific coast corridor generally utilize resources associated with marine wetland habitats including beaches, bogs, marshes, and other estuaries.

The use of WP as a landing area for migratory birds was investigated by Dr. Michael Recht. His complete report on the subject is included in Appendix D and his findings are summarized as follows:

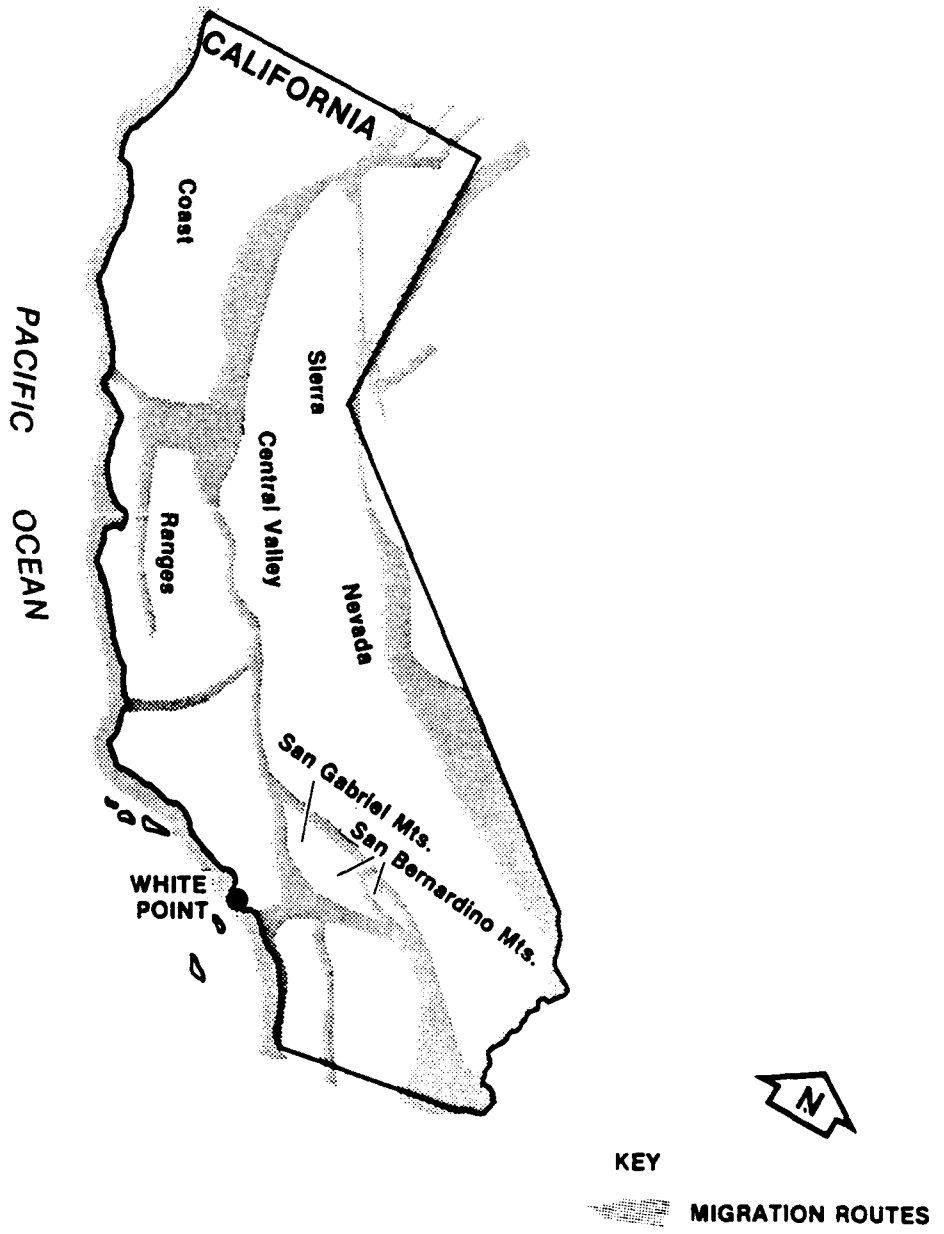


Figure 3-3
MAJOR BIRD MIGRATION CORRIDORS IN CALIFORNIA

SOURCES: Cogswell, 1977; ESE, 1986.

1. Few trees are present at the site that could provide sufficient cover or habitat for migrating species;
2. The lack of standing or free water greatly reduces the attractiveness of the park for migrating water fowl;
3. The grassland areas are disked for fire suppression each year to reduce fuel loads and control weed growth;
4. The expansive nature of the underlying soil inhibits growth of larger shrubs, further maintaining a grassland habitat; and
5. Historically, as a former military installation, the area of WP does not appear to have maintained significant populations of migrant birds.

In addition, people walk dogs that are often not on leashes on the WP area. Utilization of WP by migratory birds is minimal due to the factors presented above. SEE RESPONSE NO. 55.

219. WP Is the Only Coastal State Park Between the Ventura County Border and the Orange County Border

SEE RESPONSE NO. 49.

220. California Coastal Commission Determined the Proposed Housing Is Inconsistent with the Coastal Act; If Land Is Used for Housing a State Park Is Not Feasible

The California Coastal Commission's inconsistency statement was applicable to the original Proposed Action in the July 1984 Environmental Assessment of 50 acres on the terraces along Western Ave. The Proposed Action in the DEIS concerns 40 acres along Paseo del Mar in the southeast portion of WP. SEE RESPONSE NO. 10.

221. WP Task Force Concluded that There Is More Than Enough Land to Provide for Both the Housing and Recreational Uses

SEE RESPONSE NO. 10.

222. DEIS Did Not Address the Educational Resource Value of WP

SEE RESPONSE NO. 193.

223. DEIS Did Not Include Project Costs

SEE RESPONSE NO. 25.

224. DEIS Did Not Include Cost for Demolition of Existing Facilities at UFM; Relationship Between Cleanup of Materials at WP and UFM

SEE RESPONSE NOS. 17, 61, AND 62.

DOD funding for the IRP is for identification and control of hazardous materials resulting from past disposal operations. These funds are not a part of the housing appropriation. IRP funds would not be used to pay for the demolition of the existing structures at UFM; funds for demolition of structures would come from the housing appropriation. If hazardous materials are identified at BP or UFM, cleanup and/or control of these materials would occur regardless of whether or not these sites are selected for the proposed USAF housing.

225. DEIS Did Not Provide a Comprehensive Survey of Wildlife at WP

SEE RESPONSE NOS. 55 AND 183.

226. Housing Is a Problem for USAF Personnel

The housing allowance (BAQ and VHA) for military members is not sufficient to cover the high cost of housing in the Los Angeles/ Orange County area. As indicated on pp. 1-5 through 1-10 of the DEIS, military personnel are accepting substandard housing or driving long distances rather than absorbing the $500 to $600/month shortfall for housing. For this reason, LAAFS is experiencing reluctance of personnel to accept assignment to this area.

227. Housing Problem Is Not Unique to USAF; It Is a Problem for Navy, Marine, and Army Personnel

The Navy also is experiencing a housing deficit and, as described in the DEIS (pp. 1-15 and 1-16), is in the process of planning housing construction in this area. The Navy has taken action with the city and plans to construct housing at Suang-Na Village. An Environmental Assessment was recently prepared and construction is scheduled to begin in January 1987.

228. The Construction of USAF Housing Is Not Going to Solve the USAF Housing Problem

SEE RESPONSE NO. 70.

229. Housing Is Not a National Defense Need

SEE RESPONSE NO. 65.

230. All Land with Reversionary Clause Would Be Used for Housing in the Interest of National Defense

SEE RESPONSE NO. 67.

231. The California Coastal Commission Voted Unanimously Against the Housing Project

SEE RESPONSE NO. 220.

232. Use of WP Tidal Area for Science Studies

SEE RESPONSE NO. 193.

233. Use of Upland Areas of WP for Science Studies

The proposed housing development would be located in the area of WP that is occupied by the former NIKE facilities. The construction of these NIKE facilities, including launchers and underground missile storage silos, initially disturbed the natural environment at WP. In addition, disking of the site for fire control has disturbed natural vegetation and reduced animal habitats on the site. The housing development on the lower 40 acres would not impact the remaining 75 acres of upland WP, including the sloped

areas upper terraces. In addition, the oceanfront areas contain tidal pools, and the overlooking bluffs south of Paseo del Mar would not be impacted. Approximately 124 acres of combined oceanfront and upland area would still be available for natural science field trips by local schools (SEE RESPONSE NO. 193).

234. DEIS is Deficient in Its Discussion of the Level of Impact the Proposed Action Will Have on State Park Development of WP

SEE RESPONSE NO. 10.

235. Statements in the DEIS that Pass Judgment on the Merits of a State Park at WP

SEE RESPONSE NO. 11.

236. Statements that Lessen the Degree of Objectivity that Exists on the Part of the USAF in Reviewing Alternative Sitings

SEE RESPONSE NO. 12.

237. Inconsistency Between Housing Density Presented in Alternative D and that Prepared by the City of Los Angeles

SEE RESPONSE NO. 14.

238. Omission of Statements About Housing Density Compatibility

SEE RESPONSE NO. 15.

239. Limited Scope of Contacts Made Among Citizens Not Associated with Agencies, Utilities, or Research Organizations

SEE RESPONSE NO. 16.

240. Little Acknowledgement in the DEIS of the Level of Community Interest Expressed at the Scoping Meeting for Development of a State Park

SEE RESPONSE NO. 9.

241. The Proposed Action Would Disqualify WP for Development of a State Park

SEE RESPONSE NO. 10.

242. Statements in the DEIS that Pass Judgment on the Merits of a State Park

SEE RESPONSE NO. 11.

243. Statements that Lessen the Degree of Objectivity With Which Alternative Sites Were Analyzed; Congress Directed the USAF to Work with the City to Resolve the Issue

SEE RESPONSE NOS. 12 AND 13.

244. Inconsistency Between Housing Density Presented in Alternative D and that Prepared by the City of Los Angeles

SEE RESPONSE NO. 14.

245. Omission of Statements About Housing Density Compatibility

SEE RESPONSE NO. 15.

246. Limited Scope of Contact Made Among Citizens Not Associated With Agencies, Utilities, or Research Organizations

SEE RESPONSE NO. 16.

247. No Other Alternative Site for USAF Housing

SEE RESPONSE NO. 25.

248. Last Remaining Coastal Land in the County of Los Angeles

SEE RESPONSE NO. 49.

249. Consider Using a Buildable Area of 36 Acres at UFM

SEE RESPONSE NO. 17.

250. Need Comparable Demolition Costs for UFM and the NIKE Facilities at WP

SEE RESPONSE NO. 17.

251. Reasons for Using All of BP or UFM

BP and UFM were not originally considered for this project precisely because, unlike WP, they had been developed and were in use. The alternatives evaluation criteria (Section 3.2 in the DEIS) included the provision (Item No. 4) that the candidate site is not already committed to other uses. BP and UFM were originally determined by the USAF not to be viable sites due to their existing use. The inclusion of BP and UFM as alternative sites and their consideration in the DEIS analysis was due to the city of Los Angeles' proposal. These sites were proposed by the city to conserve as much land at WP as possible for park development.

252. Relocation of Ballfields at BP; Negotiate With the City

The city has stated that it expects the USAF to construct replacement facilities but has not offered a site. The USAF has indicated that it will contribute to the cost of replacement fields on land provided by the city, provided there are sufficient funds remaining after the contracts for construction are let and the construction cost of the housing to the government is reasonably fixed. No funds for replacement fields are included in the project budget, because no funds were needed for the WP site. As originally planned, BP was not considered for the housing due to its development and current use (SEE RESPONSE NO. 251). Therefore, unlike the Navy who had money specifically authorized by Congress for the relocation of those facilities, there is no such line item in the USAF housing appropriation.

253. DEIS Neglects to Mention the Impact of the Housing on Development of a State Park at WP

SEE RESPONSE NO. 10.

254. WP Provides Wildlife Habitat, Food Sources for Predators and Smaller Birds; Wildlife Habitat Would be Enriched if WP is Restored with New Vegetation; State Park Would Provide Numerous Recreational and Educational Opportunities

Biological surveys documented the wildlife resources at WP. As indicated in the DEIS (p. 5-28), the Proposed Action would involve housing construction along Paseo del Mar in the southeast portion of WP. This area contains the former NIKE launchers and support facilities (buildings, roadways, utilities, fences, etc.). The area has been disturbed by the previous construction and periodic disking for fire control, the development of housing in this area would be expected to cause little or no significant impact on WP. **SEE RESPONSE NO. 10.**

255. Cost of Relocating Ballfields; Replacement of Park Value at WP

Funding for the BP recreational facilities was through a state grant of $422,756 to the city of Los Angeles, with the stipulation that the city must maintain facilities at the park for a 25-year period. The city of Los Angeles contributed an additional $60,000 for a total of $482,756. In the event the recreational facilities are not available for public use, the city must invest an equivalent amount of the state grant in other recreational facilities (Mr. Joe Brightbart, Personal Communication, June 23, 1986). **SEE RESPONSE NO. 3.**

256. Estimates for Utility Costs Seem High

Utility costs ($100 to $300/month) used in the DEIS were derived from Space Division data for military families stationed at LAAFS and residing in the Los Angeles/Orange County area. The costs were scaled according to the size of proposed housing unit (i.e., 3 or 4 bedrooms) to estimate total housing costs for LAAFS personnel (Table 1.3-2; p. 1-8).

257. Would USAF Support Removal of the Reversionary Clause from the Remainder of WP

SEE RESPONSE NO. 67.

258. DEIS has One Line on the Scoping Hearing

Section 1.5 (pp. 1-20 through 1-23) of the DEIS described the results of the scoping process. The issues raised through the public scoping process were summarized in Table 1.5-1 (p. 1-23). **SEE RESPONSE NO. 9.**

259. DEIS Doesn't Address Recent Changes in Chamber of Commerce and Local Homeowner's Position Regarding Housing Compatibility

SEE RESPONSE NO. 15.

260. DEIS Presents Alternatives that the USAF Does Not Concur With

SEE RESPONSE NO. 12.

261. Before the USAF Builds on WP They Must Remove Reversionary Clause From the Transfer Deeds to the Remaining WP Property and BP

SEE RESPONSE NO. 67.

262. BP is an Important Community Facility; Ideal Location Due to Its Elevation

Section 4.11.2 (pp. 4-88 and 4-89) of the DEIS describe the soccer/football field and baseball diamond at BP and the importance of these fields to the recreation of various local community groups.

263. Recreational Facilities at BP were Constructed by a Grant from the State

SEE RESPONSE NO. 255.

264. The Cost of Developing Recreational Facilities at BP was Paid by the State; City Would Need to Repay the State if Housing Were Constructed at BP

SEE RESPONSE NO. 255.

265. USAF Would Not Affect Science Students from Using WP; Housing and a Wildlife Refuge Can Coexist; A State Park With Hundreds of Visitors Would Disturb Wildlife

SEE RESPONSE NO. 123.

An environmental analysis for development of a State Park at WP would be prepared by the State Department of Parks and Recreation, and this would address the impact hundreds of daily visitors would have on the wildlife at WP.

266. No Viable Alternative Selected

SEE RESPONSE NO. 25

267. Impact on Recreational Facilities, Schools, Freeways is Understated

The Proposed Action and each of the eight alternative development configurations (A through H) received complete impact analysis in the DEIS. A comparative analysis of the relative impacts of each alternative in 37 areas of potential environmental effects was performed in the DEIS. A comparison of the impacts associated with the eight alternative configurations is graphically depicted in Table 2 (p. vii) of the DEIS. Additionally, Section 3.6, "Comparative Analysis of Environmental Impacts of Proposed Action and Alternatives (pp. 3-32 through 3-49), describes the comparative analysis of the alternative configurations. Impacts that were determined to have either a potentially significant or adverse effect were designated by a superscript identifier in Table 2 and were discussed in Section 3.6.

As indicated in Section 3.6.12 (p. 3-42) of the DEIS, the impacts on recreational facilities were identified, especially the combination of increased demand and the loss of the existing actively used recreational facilities associated with alternatives involving BP and UFM (p. 3-43 of the DEIS).

The impact on schools has received additional analysis in the FEIS. White Point Elementary School is expected to exceed capacity by 7 percent during the 1986-87 school year and by 8 percent during the 1987-88 and 1988-89 school years.

Impacts of the Proposed Action on peak a.m. and p.m. traffic on the San Diego Freeway were conducted by the traffic engineer for this FEIS. This analysis is described in detail in Response No. 292. For the San Diego Freeway, the Proposed Action would represent a 0.08-percent increase in daily traffic and a 0.54-percent increase in peak-hour traffic. For the Harbor Freeway, north of the Vincent Thomas Bridge, the Proposed Action would represent a 2.7-percent increase in daily traffic and a 2.2-percent increase in peak-hour traffic.

268. Other Alternatives Within the Metropolitan Los Angeles Area Should Be Available

SEE RESPONSE NO. 22 (map is submitted as part of Response No. 22).

269. No Viable Options Presented

The USAF has evaluated more than 45 alternative sites dating back to the late 1970s. **SEE RESPONSE NO. 25.**

270. What is Procedure for Comments and Responses?

In accordance with NEPA and CEQ regulations (40 CFR 1500), the USAF is required to invite comments from Federal, state, and local agencies on the DEIS before preparing an FEIS. Additionally, the USAF is required to request comments from the public, affirmatively soliciting comments from those persons who may be interested or potentially affected by the action. In accordance with CEQ regulations, the USAF is required to assess and consider comments to the DEIS and respond to these comments in the FEIS. **SEE RESPONSE NO. 19.**

271. USAF Should Use the Parade Ground at MFM for Additional Housing

The parade ground at MFM is a part of the original 50-acre site (500 Varas Square) of Fort MacArthur. The parade ground and adjacent buildings are part of a designated historical district that is listed in the National Register of Historical Places.

Construction of housing on the parade ground would be contrary to Federal regulations (36 CFR 800).

272. Public is Shortchanged on Time for Review of DEIS

THe DEIS was filed with EPA and distributed to the public on April 3, 1986. The Federal Register notice appeared on April 11, 1986, which initiated the public comment period. The 45-day comment period as specified in CEQ regulations (40 CFR 1506.10) ended on May 27, 1986. The USAF accepted comments until June 2, 1986.

273. Community Support at Scoping Meeting for State Park at WP Was Not Reflected in DEIS

SEE RESPONSE NO. 19.

274. It Was Not Until the July 1984 EA that the Question of USAF Access to WP or Anywhere in San Pedro was Addressed

As described in Section 1.4 (p. 1-11) of the DEIS, in 1975 Space Division (then called Space and Missile Systems Organization) undertook an investigation of WP and UFM for construction of USAF housing. The U.S. Army had reported these parcels as excess in 1975. The USAF prepared a candidate EIS in 1975 analyzing the impacts of housing on WP and UFM. This report is Reference No. 85 in the bibliography of the DEIS.

The area known as MFM, where 370 units of USAF family housing was eventually constructed, was not considered in the 1975 EIS because at that time it was not proposed for excessing by the Army. When it became clear that MFM would also be excessed by the Army, the USAF suspended its plans for housing on either WP or UFM, and the City and County of Los Angeles began to actively consider use of WP and UFM.

275. Security Question Regarding All USAF Officers Being Housed at One Location

Security measures are more easily implemented and are more cost-effective when military personnel are housed at a single location.

276. State Park Plans for WP are Vaguely Addressed in the DEIS

SEE RESPONSE NO. 10.

277. Housing Development Would Not Have Public Access

The housing development would be fenced for security purposes. As indicated on p. 5-85 of the DEIS, Alternative A would include joint use USAF/community recreational facilities (a 5- to 7-acre athletic field). The Proposed Action and other alternatives would not include athletic fields due to limited amount of land. Vegetation would be included in landscaping plans to provide a scenic buffer between the 40-acre Proposed Action development and the remaining 75 acres of WP. The fencing around the housing development would not affect public access to the 75 acres at WP, or the combined 49 acres at Royal Palms State Beach, the county property along the coast at WP, and the upland county land south of Paseo del Mar. Currently, public access to WP is limited because the entire 115-acre parcel is fenced and has locked gates.

278. Will USAF Coexist at WP with a State Park

The USAF housing at WP does not preclude the development of a park. The USAF believes that the housing and a city- or state-managed park can co-exist at WP (SEE RESPONSE NOS. 8 AND 10).

279. Would USAF Support the Removal of the Reversionary Clause on the Remaining Property at WP

The USAF has stated that it would support the city's efforts to have the reversionary clause removed from the Deed of Transfer (SEE RESPONSE NO. 67).

280. Will USAF Enter into Serious Negotiations with the City, State, and Community Representatives

SEE RESPONSE NO. 153.

281. USAF Should Interact with Public Regarding the Various Concerns of the Community Prior to Publication of the FEIS

SEE RESPONSE NO. 280.

282. USAF is Not Listening to the Concerns of the Community

SEE RESPONSE NOS. 9, 19, AND 153.

283. Community Support for State Park at WP is not Adequately Reflected in the DEIS

SEE RESPONSE NO. 9.

284. DEIS Statement that if USAF no Longer Needed the Housing the Land Could Theoretically be Returned to its Existing Seminatural Open State; Abandoned Military Housing is Required to be First Offered to the Community for Low Income Housing

The USAF is aware of the requirement to offer military housing as low income housing if it is no longer needed for military personnel. The statement made in the DEIS (pp. xii and 8-1) that the land could theoretically be returned to its previous semi-open state refers to the fact that the housing will have a finite time for any type of use based on its structural condition. The BP site is a useful parallel example. The former Navy housing at the site was removed because it was no longer useful and the site has been returned to its previous open state.

285. Public Use of USAF Recreational Facilities

SEE RESPONSE NO. 277.

286. Geologic and Soil Stability for Residential Development

The geologic and soil stabilities of the WP site are considerations which the USAF has given much attention. A detailed field investigation and testing program was conducted by Woodward-Clyde

Consultants to provide data required for preparation of the DEIS. The Woodward-Clyde Consultants soils report is summarized in the DEIS in Sections 4.2 and 5.2.

The soils report indicates that there are no serious limitations for the Proposed Action or any of the alternatives. It does indicate that the geologic conditions will need to be considered in the planning and design of the development to ensure that the grading results in stable conditions. A total of 302 test borings and pits were spaced at one to three per acre at WP to determine, in detail, the site characteristics. The tuff layer that was suspected of causing the landslide problems at the Portugese Bend area was not identified at WP.

287. WP is Located Along the Migratory Flyway Path of Birds

SEE RESPONSE NO. 218.

288. 170 Housing Units Divided by 40 Acres Yields Lot Sizes of a Quarter of An Acre Each

The 40-acre parcel of the Proposed Action is the total acreage available. This would include space for streets, parking, sidewalks, common areas such as recreational facilities (e.g., tennis courts), and utility systems, as well as the houses and individual lots. If it is assumed that approximately 30 percent of the 40-acre parcel is used for streets and other common areas, 28 acres would remain for houses. This results in 6 houses per acre or lot sizes of one sixth of acre each. **SEE RESPONSE NO. 154.**

289. Impact of Declining Interest Rates of Ability of USAF Personnel to Purchase Housing in the Private Sector

SEE RESPONSE NO. 175.

290. Quantification of Air Quality Impacts

The existing air quality environment and the impacts are discussed in detail and quantified in Sections 4.5.2 and 5.5, respectively, of the DEIS.

In Section 5.5, the impacts are distinguished into two types: short term and long term. Short-term impacts are related primarily to construction activity, including construction equipment exhaust emissions and emission of fugitive dust due to site preparation. Long-term impacts are those associated with increases in traffic and natural gas consumption. Each of these is quantified by use of emissions factors and other available data. The project-related contributions are compared to the existing environment on a local and regional basis. Increases in daily emissions are anticipated to range from 0.02 to 0.04 percent in the region and 1 to 3 percent locally (south San Pedro).

291. Quantification of Stormwater Runoff Volume and Pollutant Loading

The existing surface water environment and the impacts of the Proposed Action are discussed in detail and quantified in Sections 4.7 and 5.7, respectively, of the DEIS. Evaluation of impacts includes both runoff volumes and water quality.

Several separate watersheds are involved in the evaluation of the Proposed Action and alternatives. Impacts are, therefore, quantified for individual basins and also the overall impacts to the receiving coastal waters. Culvert and storm sewer information was collected from the city engineering department and through field inspections. Runoff volume impacts for a 10-year, 24-hour storm were quantified. Water quality impacts were evaluated on an annual basis using land-use-related pollutant loading data from the recently completed National Urban Runoff Pollutant study by EPA. An increase in pollutant loading of 1.5 percent was calculated for the Proposed Action when compared to the total existing loading.

292. Impacts on the Regional Transportation System (Harbor and San Diego Freeways)

Discussions of the local and San Pedro area existing transportation system and impacts are included in Sections 4.13 and 5.13, respectively, and the complete traffic study report is included in Appendix H of the DEIS. Quantification of the impacts of the Proposed Action and Alternatives, on the Harbor (I-110) and San Diego (I-405) Freeways, has been completed. This traffic information is included in Appendix C of the FEIS and is summarized in the following paragraph.

Data were presented in the DEIS which indicate that 85 percent of the USAF personnel can be expected to car pool for the drive to and from the Space Division offices by way of the Harbor Freeway, San Diego Freeway, or other routes. The number of trips on these routes generated by the Proposed Action or any alternatives is small compared to the system capacity and impacts of other development in the region. The impacts on the San Pedro area system were determined to result in no reduction of the level of service and no significant percentage increase in total traffic. The relative impacts on the larger regional system would be less. Project traffic would represent a 2.7-percent increase in daily traffic and a 2.2-percent increase in peak-hour traffic on the Harbor Freeway north of Vincent Thomas Bridge. For the San Diego Freeway, the Proposed Action would represent a 0.08-percent increase in daily traffic and a 0.54-percent increase in peak-hour traffic.

293. Summarize Findings of Geotechnical Investigations

The geotechnical report prepared by Woodward Clyde Consultants is summarized in the discussion presented in Sections 4.2 and 5.2 of the DEIS. The primary geological/geotechnical concerns related to the Proposed Action and alternatives include stability of the soils against sliding induced by construction grading, erosion, earthquakes, etc., and the stability of the expansive soils that exist in the area of WP.

The Woodward Clyde Consultants report indicates that none of these factors present serious problems to the Proposed Action or any alternative. In addition, the volcanic tuff layer, which was reported to have been the primary plane of weakness for the Portugese Bend landslide, was not found at WP to the depth investigated in the survey. The location, size, and orientation of cuts must be considered in the site layout and design. Any expansive soils located immediately under each structure will need to be excavated between 3 and 5 ft, based on site-specific characteristics. The sites involved did not possess unusual or unsafe geologic characteristics.

294. Address Expansive Soils and the Affect on Stability of Housing

As indicated in Sections 4.2 and 5.2 of the DEIS, the WP, BP, and UFM sites are covered with soils that have been determined to be highly expansive by the site-specific geotechnical investigations. These soils will need to be removed offsite and replaced with engineered fill from offsite sources in areas of foundations, roadways, and vehicle parking. Following rough grading operations, soil removal to a depth of 4 to 5 ft in areas of foundations and roadways will occur. These soils will be disposed of offsite. Both the rough grading and soil removal operations will involve pan graders, bulldozers, dump trucks, etc. The replacement, engineered fill, will be brought in from offsite and deposited in 1-ft increments, followed by compaction with rollers, packers, etc. Building foundations and roadways will then be constructed on the fill.

295. Date and Time of Traffic Data

The traffic study discussed in Sections 4.13 and 5.13 utilized daily traffic data collected by the City of Los Angeles for several road segments in the San Pedro area. These data represent average daily traffic volumes and are the most up-to-date information available from the city. The data are collected by

297. Paseo del Mar is a Two-Lane Road in the WP Area; Not a Four-Lane Road as Reported

As given in the DEIS (Section 4.13.1; p. 4-99), Paseo del Mar is correctly identified as a 2-lane road along the southerly boundary of the site. The July 1984 Environmental Assessment incorrectly identified Paseo del Mar as a 4-lane road in the vicinity of WP.

298. Potential for Earthquake at the Site

As described in the DEIS in Section 5.2.1.4 (pp. 5-8 and 5-9), no significant seismic hazards which suggest that the Proposed Action is exposed to more potential damage from seismic events than the surrounding areas were identified. No known active faults cross WP. The closest mapped fault, the Cabrillo fault, is located at the base of the northeast facing slope that borders BP. This fault does not appear to have had significant seismic activity in the past 500,000 years. Although minor shifting could conceivably occur in response to rupture on the Cabrillo fault if it were to become active, it is anticipated that these displacements would not impose a significant threat to the housing development. The most likely seismic hazard that will impact the site will be due to seismic shaking generated by rupture on regional active faults such as the Palos Verdes or San Adreas faults. The risk of damage from seismic activity on these regional faults is comparable to many other areas of Southern California. Liquefaction due to seismic shaking is not considered a hazard due to deep ground water at the site and the cohesive nature of the soils. The complete results of the geotechnical investigations at WP and BP can be obtained from the USAF.

299. Architecture of the USAF Housing at MFM is Disappointing

Design and construction of housing is the responsibility of the Directorate of Acquisition Engineering at LAAFS. The principal objective is to provide the best possible family housing for the funds that were appropriated by Congress. The housing appropriation is the minimum amount to provide adequate housing

the city at various locations on an ongoing basis, and data at a particular location may be from a previous year. The accuracy of the data collection program and impact analysis do not warrant obtaining traffic counts for use in this study.

An intersection capacity utilization (ICU) analysis which provides a measure of the level of service at peak usage, is also provided. The traffic engineering consultants, Weston Pringle and Associates, collected peak-hour traffic data in 1984 at the intersection of Western Ave. and 25th St., a primary signalized intersection in the vicinity of WP and BP. Those peak-hour traffic data were used in the ICU analysis presented in the DEIS.

296. Copy of the DEIS not Found in San Pedro Library

The DEIS was distributed to the public on April 3, 1986. At that time, the local libraries were mailed a copy of the DEIS. These are as follows (see Section 11.0 of the DEIS):

Library	City
1. San Pedro Regional Branch Libary	San Pedro
2. Public Library (Civic Center Branch)	Torrance
3. Public Library (Main)	Long Beach
4. Los Angeles Harbor College Library	Wilmington
5. California State University Dominguez Hills Library	Carson
6. County of Los Angeles, Dominguez Branch Public Library	Long Beach
7. City of Rancho Palos Verdes, Miratestie Branch Library	Rancho Palos Verdes
8. City of Los Angeles Main Public Library	Los Angeles
9. University of California at Los Angeles Library	Long Beach
10. California State University, Long Beach Library	Long Beach
11. City of Rancho Palos Verdes Peninsula City Branch Library	Ranchos Palos Verdes

The cover letter attached to the DEIS requested that the library place the report in the Government Publications Section of each library. No DEIS reports were returned to the USAF by the Postal Service, so it was assumed that all the reports were received.

for 170 families. Nevertheless, the USAF civil engineering staff takes great pride in the design and construction of the best possible facilities considering the funds appropriated. The civil engineering staff recently received design awards from professional engineering organizations for several of their recently completed projects.

300. USAF is not Listening to the Concerns of the People

SEE RESPONSE NOS. 9, 19, AND 153.

4.0 CORRECTION TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The following corrections are applicable to the Draft Environmental Impact Statement, Air Force, Space Division, Housing Project, San Pedro, California, April 1986.

Page 1-1, Line 12, Change EA to EIS.

Page 1-4, Line 9, Change No. 2. Minimum footage based on rank;" to read No. 2. Minimum square footage based on number of bedrooms (subminimum square footage not inadequate except in unusual circumstances);"

Page 1-4, Line 14, Change No. 6. Rent/mortgage plus utilities must be within Basic Allowance for Quarters (BAQ) plus any Variable Housing Allowance* (VHA) for area; and" to read No. 6. Rent/mortgage plus utilities must not exceed Basic Allowance for Quarters (BAQ) plus any Variable Housing Allowance* (VHA) for area by more than maximum monthly housing cost above allowances (MAHC herein); and"

Page 1-4, Line 17, Change No. 7. Unit must be within a 1-hour or less commuting distance from duty station." to read No. 7. Unit must be within 30 miles and a 1-hour or less commuting distance from duty station."

Page 1-5, Line 15, Change "The BAQ plus the VHA is the maximum housing allowance which is set by Congress and establishes the cost that military personnel can afford to pay for housing (including utilities) without experiencing financial hardship." to read "The BAQ plus the VHA is the maximum housing allowance. The maximum monthly housing cost above allowances (MAHC) establishes the additional cost that military personnel can afford to pay for housing (including utilities) without experiencing financial hardship."

Page 1-5, Line 25, Change "The determination of suitable housing is based on three factors:" to read "The determination of unsuitable housing is based on three factors:"

Page 1-5, Line 27, Change No. 1. Commuting distance (i.e., greater than a 1-hour drive at peak traffic conditions);" to read No. 1. Commuting distance (i.e., greater than 30 miles or a 1-hour drive at peak traffic conditions);"

Page 1-5, Line 29, Change No. 2. Substandard conditions (i.e., incomplete utilities, structural conditions, number of bedrooms, inadequate square footage, poor neighborhood); and" to read No. 2. Substandard conditions (i.e., incomplete utilities, structural conditions, number of bedrooms, inadequate square footage in combination with unusual circumstances, poor neighborhood); and"

Page 3-5, Line 5, Change No. 1. Site must be within an average 1-hour commuting distance." to read No. 1. Site must be within a 1-hour commuting distance during rush hour and not exceed 30 miles.

Page 4-65, Line 7, Change 62,336 to 65,083.

Page 4-66, Line 10, Change 62,004 to 62,336.

Page 4-90, Line 26, Change primary to secondary.

Page 4-95, Line 30, Change Los Angeles County to Terminal Island Treatment Plant.

Page 4-98, Line 3, Change Los Angeles County Sanitation District No. 2 to Terminal Island Treatment Plant.

Page 5-80, Line 20, Impacts have been revised such that the project will impact White Point Elementary School by exceeding capacity by 7 percent

during the 1986-87 school year and by 8 percent during the 1987-88 and 1988-89 school years. See discussion in Response No. 48.

Page 5-104, Line 22, Change 2.9 increase to "2.9 percent" increase.

Page 5-111, Line 16, Change "Launches" to Launchers".

Page 13-1, Line 12, Change "Degreee" to "Degree."

Page 13-3, Line 26, Change "Enginering" to Engineering."

Pages E-28 and E-29, The keys to these photographs are transposed. The key shown on Page E-28 should be on Page E-29 and vice-versa.

5.0 LIST OF PREPARERS

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7.0 APPENDICES

APPENDIX A—FEIS MAILING LIST

APPENDIX A

INDIVIDUALS, GROUPS, PUBLIC OFFICIALS, AND AGENCIES WHO RECEIVED COPIES OF THE FINAL REPORT

The following elected officials, agencies, groups, and individuals have received a copy of this final EIS:

Elected Official/Agency/ Group/Individual	City and State (State is California, unless designated otherwise)
Elected Officials, Agencies, Groups	
Honorable Alan Cranston, U.S. Senator	Los Angeles
Honorable Pete Wilson, U.S. Senator	San Diego
Honorable Glenn Anderson, Member, U.S. House of Representatives	Long Beach
Honorable Mel Levine, Member, U.S. House of Representatives	Los Angeles
Honorable Dan Lungren, Member U.S. House of Representatives	Long Beach
Honorable Robert Beverly, California Senate	San Pedro
Honorable Joan Milke-Flores, Councilwoman, 15th District	San Pedro
Honorable Gerald Felando, California Assembly	Torrance
Honorable Dave Elder, California Assembly	Long Beach
Honorable Tom Bradley, Mayor of the City of Los Angeles	Los Angeles
Honorable Deane Dana, Supervisor, Fourth District, Los Angeles County	Los Angeles
U.S. Department of Interior, Office of Environmental Project Review	San Francisco
U.S. Department of Interior, Fish and Wildlife Service	Laguna Niguel
U.S. Department of Interior, Bureau of Indian Affairs	Riverside
U.S. Department of Interior, Bureau of Indian Affairs	Sacramento
U.S. Department of Interior, National Park Service, Interagency Archeological Service	San Francisco
U.S. Department of Interior, Office of the Secretary	Washington, D.C.
U.S. Department of Interior U.S. Fish and Wildlife Service- Western Region	Portland, OR

Elected Official/Agency/ Group/Individual	City and State (State is California, unless designated otherwise)
Elected Officials, Agencies, Groups (Continued)	
U.S. Environmental Protection Agency, Region IX	San Francisco
U.S. Environmental Protection Agency	Washington, D.C.
U.S. Fish and Wildlife Service, Endangered Species Office	Sacramento
Department of Army, Los Angeles District Corps of Engineers	Los Angeles
Dr. Vance Grant, Federal Department of Education	
Advisory Council on Historical Preservation, Western Office	Golden, CO
Mr. Andy Jones, Army-Air Force Exchange Service (AAFES)	Dallas, TX
Mr. Charles Odom, Headquarters Air Force Commissaries (AFCOM)	Kelly AFB, TX
Mr. Steve Glover, U.S. Army COE, Huntsville District	Huntsville, AL
Major Clark, Air Force Space Command	Peterson AFB, CO
Mr. Jerry Hemstock, Long Beach Naval Housing Office	San Bruno
California Department of Transportation	Los Angeles
California Department of Fish and Game	Long Beach
California Department of Conservation	Sacramento
California Department of Water Resources	Sacramento
State Coastal Conservancy	Oakland
Governor's Office,. State of California	Sacramento
California Department of Fish and Game	Sacramento
Brian Farris, Southern California Air Quality Management District	El Monte
Resource Agency of California	Sacramento
California State Historic Preservation Office	Sacramento
California State Clearing House, Office of Planning and Research	Sacramento
California Native Plant Society	Sacramento
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Mr. James Hadaway, Department of Parks and Recreation	Los Angeles
California Department of Parks and Recreation	Sacramento
California Coastal Commission	San Francisco
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Principal, Dana Jr. High School	San Pedro
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Public Library (Main)	Long Beach
Los Angeles Harbor College Library	Wilmington
California State University Dominguez Hills Library	Carson
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City of Los Angeles Main Public Library	Los Angeles
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Kiwanis Club of San Pedro	San Pedro
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Maj. Kirk Links	San Pedro
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Mr. & Mrs. A. Samuels	San Pedro
Alfred Sattler	San Pedro
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Bill Schafer	San Pedro
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Ms. Christine Ung	Los Angeles
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Lino Zavala	San Pedro
Barry Zilin	San Pedro
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APPENDIX B—FINAL COASTAL CONSISTENCY DOCUMENT

Environmental Impact Analysis Process



FEDERAL COASTAL CONSISTENCY
DETERMINATION
AIR FORCE SPACE DIVISION
HOUSING PROJECT, SAN PEDRO,
CALIFORNIA
APRIL 1986

DEPARTMENT OF THE AIR FORCE

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FEDERAL COASTAL CONSISTENCY DETERMINATION:

AIR FORCE SPACE DIVISION HOUSING PROJECT

SAN PEDRO, CALIFORNIA

UNITED STATES AIR FORCE
HQ SD/DEV
Los Angeles Air Force Station, California

April 1986

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1.0 PURPOSE

A Coastal Consistency Determination for Federal actions is required in accordance with the Federal Coastal Zone Management Act of 1972, as amended, Section 307(c)(1) and with the National Oceanic and Atmospheric Administration (NOAA) Regulations [15 Code of Federal Regulations (CFR) 930.33 and .34, et. seq.]. All Federal agencies are required to ensure that their undertakings are consistent to the "maximum extent practicable" with the NOAA approved state coastal management plan for actions that may have direct impacts on the coastal zone. The state's coastal management plans and coastal zone were established by the California Coastal Act of 1976, as amended, and its implementing regulations. The California Coastal Management Plan (CCMP) has been approved by NOAA. The purpose of this document is to identify and analyze the specific environmental impacts associated with the proposed construction and operation of 170 single-family housing units on 40 acres of land in the southeast portion of White Point (WP) in San Pedro, CA. These housing units will support U.S. Air Force (USAF) personnel assigned to the Space Division (SD) of USAF located at Los Angeles Air Force Station (LAAFS) in El Segundo, CA.

In August 1984, the USAF made a finding of consistency for a project consisting of 170 units of military housing on 50 acres of the north portion of WP. In June 1985, the California Coastal Commission (CCC), on the recommendations of its staff, non-concurred with the USAF finding of consistency. In July 1985, the USAF informed the CCC and the California Department of Resources that notwithstanding the non-concurrence of the CCC, the USAF still considers that the proposed project of 170 housing units of 50 acres of WP was consistent to the "maximum

extent practicable" with the Federal Coastal Zone Management Act. However, as recommended by the CCC, the USAF agreed to engage in negotiations with the City of Los Angeles to determine if other alternative sites could be considered. From July 1985 to the present, including the current Environmental Impact Statement (EIS) process, the USAF has been negotiating with the City of Los Angeles on these proposals (see Appendix 1).

Although the USAF and the city have not reached an agreement, negotiations have resulted in the Proposed Action and eight alternatives involving WP, Bogdanovich Park (BP), and the Upper Reservation of Fort MacArthur (UFM). WP and UFM are located south of 25th St., the inland boundary of the California Coastal Zone in this area. BP is located north of 24th St. and, therefore, is not within the designated Coastal Zone.

In April 1986, the USAF released for public review a Draft EIS for the SD San Pedro Housing Project which describes in detail the environmental impacts for the Proposed Action and these eight alternatives. This Federal Coastal Consistency Determination is a companion document to the Draft EIS. The environmental impacts identified within this document are discussed in greater detail in the Draft EIS.

1.1 NEED FOR THE PROPOSED ACTION

LAAFS, located in the City of El Segundo, Los Angeles County, is the headquarters for the USAF SD, which includes the 6592nd Air Base Group and 20 tenant organizations. SD is responsible for the research and development of the Department of Defense (DOD) space systems. This responsibility includes the planning, programming, and management of the acquisition of space systems, support equipment, and related hardware and software. SD also provides for the maintenance and construction of launch, tracking, and support facilities and provides launch and flight test support to major DOD programs and those of other Federal agencies. The launch, on-orbit satellite tracking, data acquisition, and command and control of DOD satellites are performed by SD.

In accordance with DOD regulations, the USAF is responsible for the health and welfare of its military personnel and their dependents, including provisions for adequate housing through either the availability of government-provided housing or the payment of housing allowances to obtain (rent or own) nongovernment housing in the local community. LAAFS differs from most USAF installations in that until 1982 it had no onbase family housing. For more than 15 years, the USAF has been involved in efforts to provide adequate, affordable housing for its personnel at LAAFS. The recently constructed 370 housing units for junior officers and enlisted personnel on a portion of the Fort MacArthur Military Reservation in the San Pedro community has partially met the objective of providing adequate housing for all military personnel assigned to LAAFS.

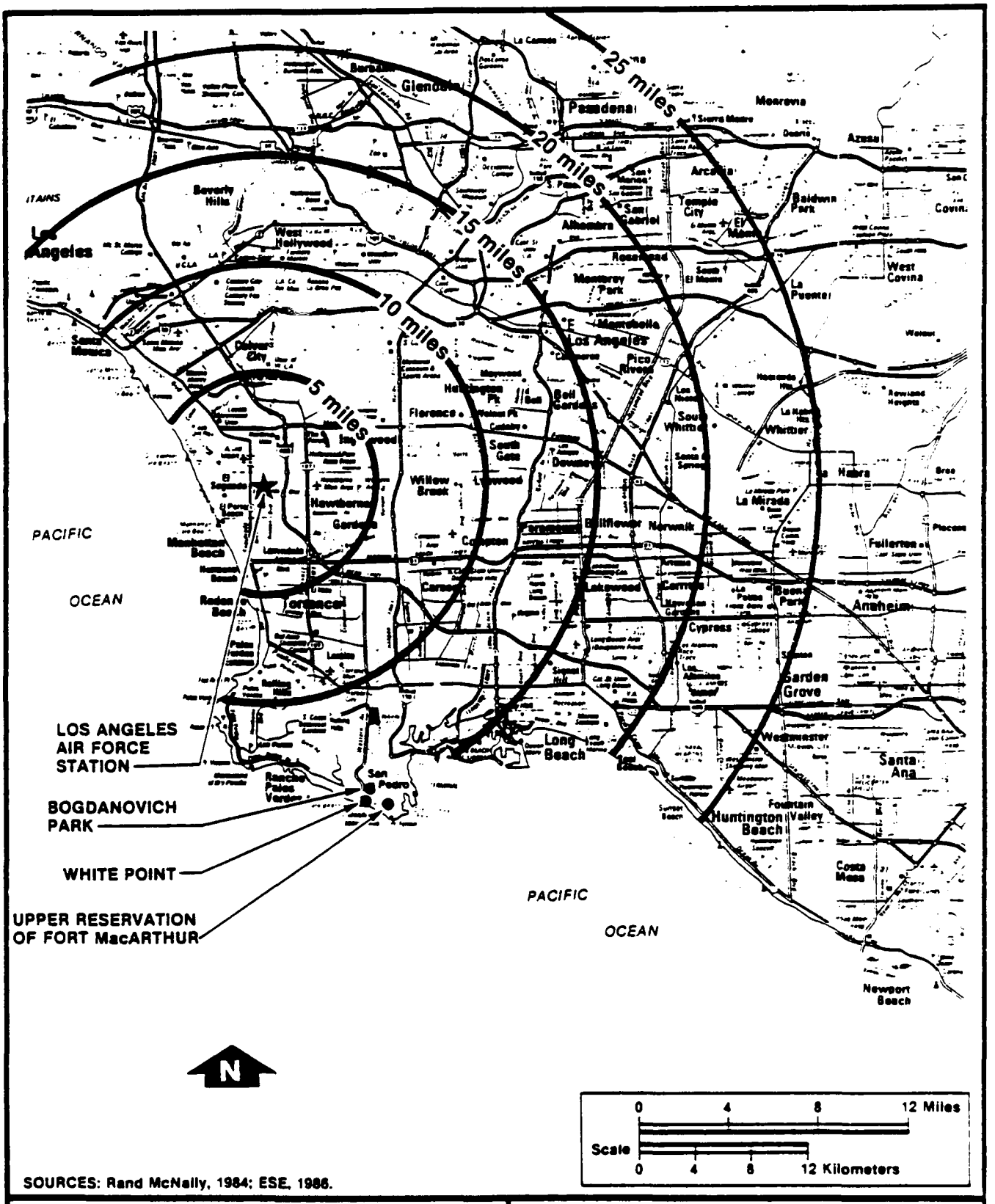
Annual surveys of military personnel at LAAFS who are not provided government housing and paid housing allowances show that field grade and senior officers are experiencing financial hardships in obtaining adequate housing. The results of the most recent housing survey (September 1985) indicate that of the 854 officers at LAAFS, 582 are considered unsuitably housed. The lack of adequate housing and financial shortfalls have created problems for the USAF in recruiting and retaining qualified personnel to meet its mission at LAAFS as compared to other installations. In recognition of these problems and the critical need for adequate housing of military personnel assigned to LAAFS, the 1983 and 1985 Congresses approved funds for the construction of an additional 170 housing units.

The housing units are planned to include ninety (90) 3-bedroom units with an average 1,375 square feet (ft^2) and eighty (80) 4-bedroom units with an average 1,570 ft^2. The Proposed Action also includes several acres designated for open space and recreational uses (tennis courts, basketball courts, etc.), as well as landscaping to enhance the visual quality of the development. The units will house approximately 660 military personnel and their family members.

1.2 REGIONAL LOCATION

The Proposed Action would be located on 40 acres at the southeast corner of WP. BP and the UFM and various regional sites were considered as alternatives to the Proposed Action. The regional location of these sites is presented in Figure 1-1. Various project alternatives and configurations on these sites are considered in this document, including the July 1984 proposed action of 170 single-family units on 50 acres at the northeastern portion of WP and the City of Los Angeles' proposal for a split site using BP and WP. Detailed descriptions of these local alternatives are presented in Section 2.0.

As shown in Figure 1-1, the sites are located within the San Pedro community of the City of Los Angeles and are within 20 road miles of IAAFS, which is located in the City of El Segundo. A local vicinity map showing the relationship of WP, BP, and UFM is given in Figure 1-2.



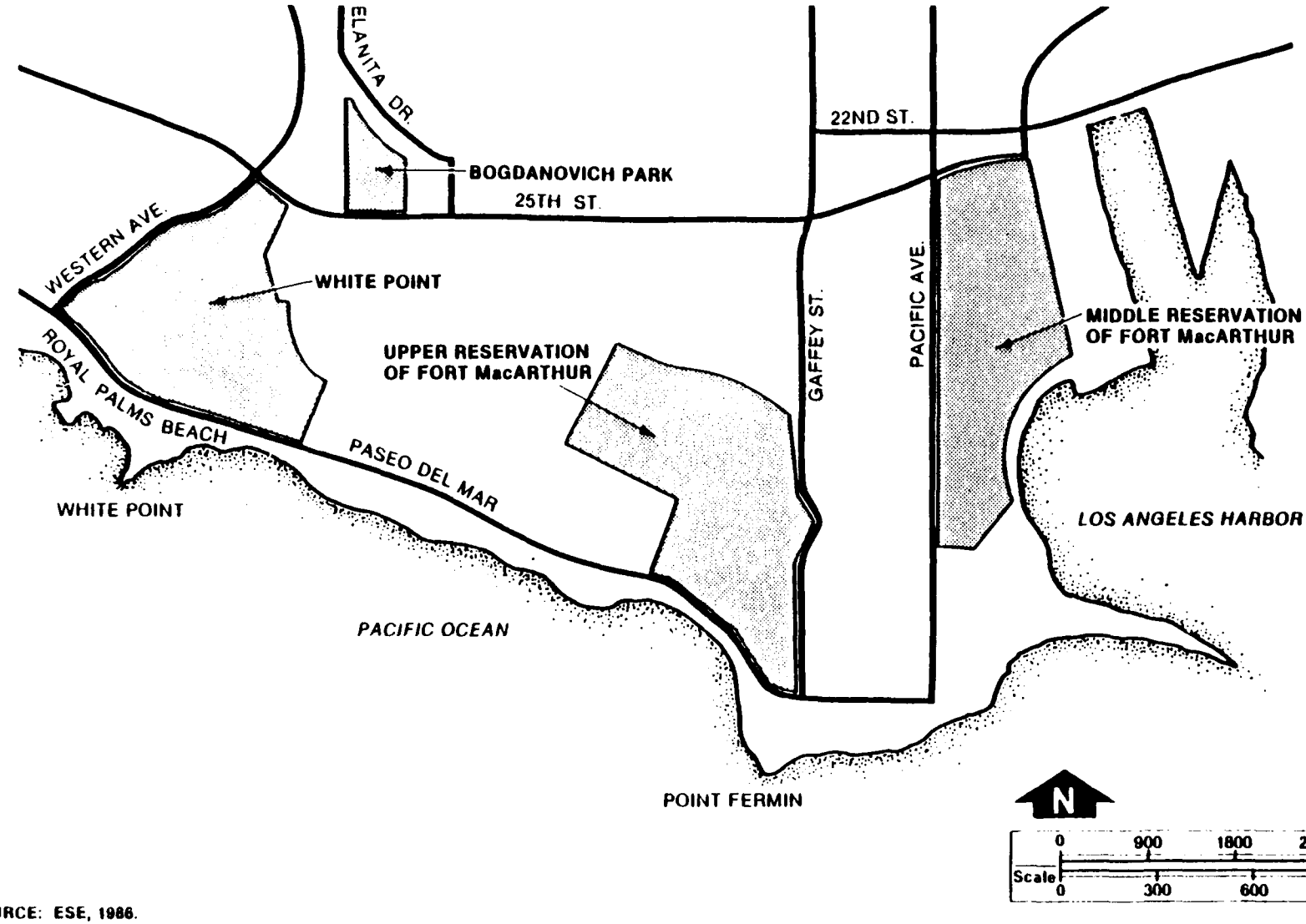
SOURCES: Rand McNally, 1984; ESE, 1986.

Figure 1-1
REGIONAL LOCATION MAP

Coastal Consistency Determination

Air Force Space Division

Housing Project, San Pedro, California



SOURCE: ESE, 1986.

Figure 1-2
VICINITY LOCATION MAP FOR WHITE POINT, BOGDANOVICH PARK, AND UPPER RESERVATION OF FORT MacARTHUR

Coastal Consistency Determination

Air Force Space Division

Housing Project, San Pedro, California

2.0 THE PROPOSED ACTION AND ALTERNATIVES

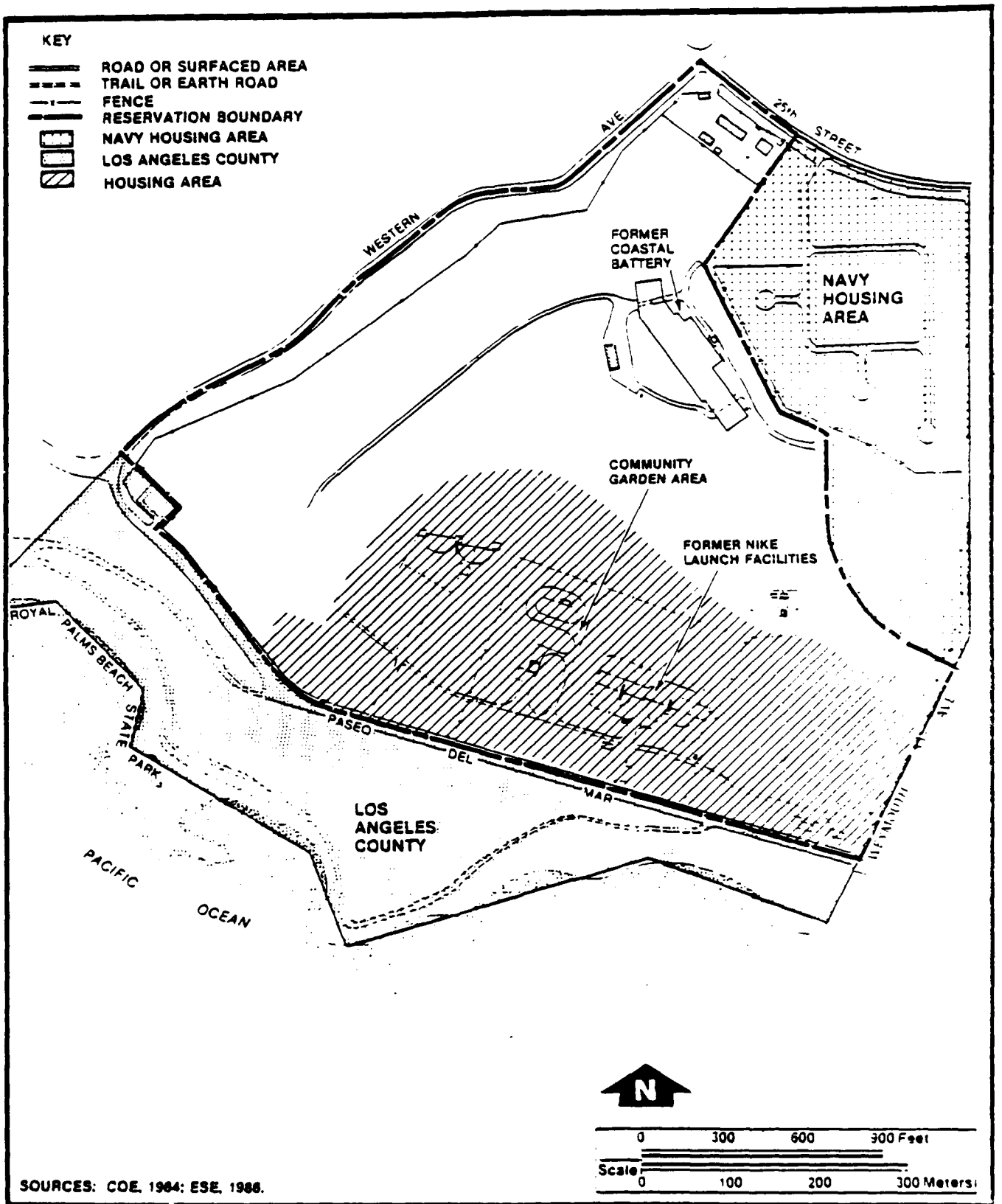
2.1 PROPOSED ACTION AND SCOPE

The Proposed Action is to construct 170 single-family units on 40 acres of land at the southeast corner of WP extending westward along Paseo del Mar. This property would be acquired by exercising the reversionary clause in the Federal deed of transfer to the city. This area is shown in Figure 2-1. The area is relatively level and is bounded to the south by Paseo del Mar and to the east by Weymouth Ave. There is a sharp elevational gradient beginning at the 175-feet (ft) contour along the northern boundary of the Proposed Action location. This gradient severely limits the extent of the Proposed Action along the north-south axis. Implementation of the Proposed Action would result in an average density of 4.3 dwelling units per acre (du/acre).

As shown in Figure 2-1, the Proposed Action does not include the former Coastal Battery but does include the area of the former NIKE missile launchers and the community garden. The Proposed Action does not involve any of the county property south of Paseo del Mar or Royal Palms Beach State Park.

Conceptual siting plans and engineering designs have not been developed for the Proposed Action. The siting plan will include an open "Green Belt" area.

The construction of 170 units is intended to eliminate the present housing deficiencies for LAAFS field grade and senior military personnel. The housing units are designated primarily for field grade and senior grade officers (majors, lt. colonels, and colonels). Approximately 53 percent (90 units) are expected to be 3-bedroom units, with the remaining 47 percent (80 units) being 4-bedroom units. The units will include a car shelter with storage space, depending on



SOURCES: COE, 1964; ESE, 1988.

Figure 2-1
WHITE POINT SHOWING HOUSING ON 40 ACRES IN THE SOUTHEAST PORTION

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availability of funds. All units will be insulated for energy conservation in conformance with DOD criteria.

The number of units and bedrooms and the unit sizes are listed in Table 2-1. The average 3-bedroom unit will have a net floor area of approximately 1,375 ft^2, and the average 4-bedroom unit will have approximately 1,570 ft^2. Neither the interior or exterior design of the units has been determined.

The units are to be constructed under USAF Family Housing Design Criteria (AF Manual 88-25). These standards are of high quality, and meet or exceed all local ordinances. They include a full range of criteria for the design and construction of not only the dwelling units themselves, but also utility and waste disposal systems, as well as vehicular and pedestrian circulation. In addition, the standards specify requirements for fire protection, landscaping, privacy, and open space for recreation. The units constructed will be aesthetically compatible with the surrounding community.

2.2 ALTERNATIVE LOCATIONS FOR THE PROPOSED ACTION

This section describes the local (San Pedro area) alternative sites for the proposed housing. These local alternative sites include BP and UFM, which were suggested by the City of Los Angeles. Neither site is large enough to accommodate all 170 units. With these additional sites, there are eight possible configurations for the 170 housing units involving various combinations of WP, BP, and UFM. These alternatives are listed in Table 2-2 and shown in Figure 2-2. The following paragraphs describe each of the development sitings.

2.2.1 ALTERNATIVES INVOLVING WHITE POINT (WP) ONLY

2.2.1.1 ALTERNATIVE A--50 ACRES IN NORTHWEST AREA OF WP

This alternative is the proposed action that was addressed in the July 1984 EA. This alternative involves construction of 170 single-family

Table 2-1. Housing Type and Size

Number of Units	Number of Bedrooms	Approximate Net Square Feet Per Unit
20	3	1,350
70	3	1,400
10	4	1,450
50	4	1,550
20	4	1,700
170 Total	-	---

Sources: Beland and Associates, 1984;
ESE, 1986.

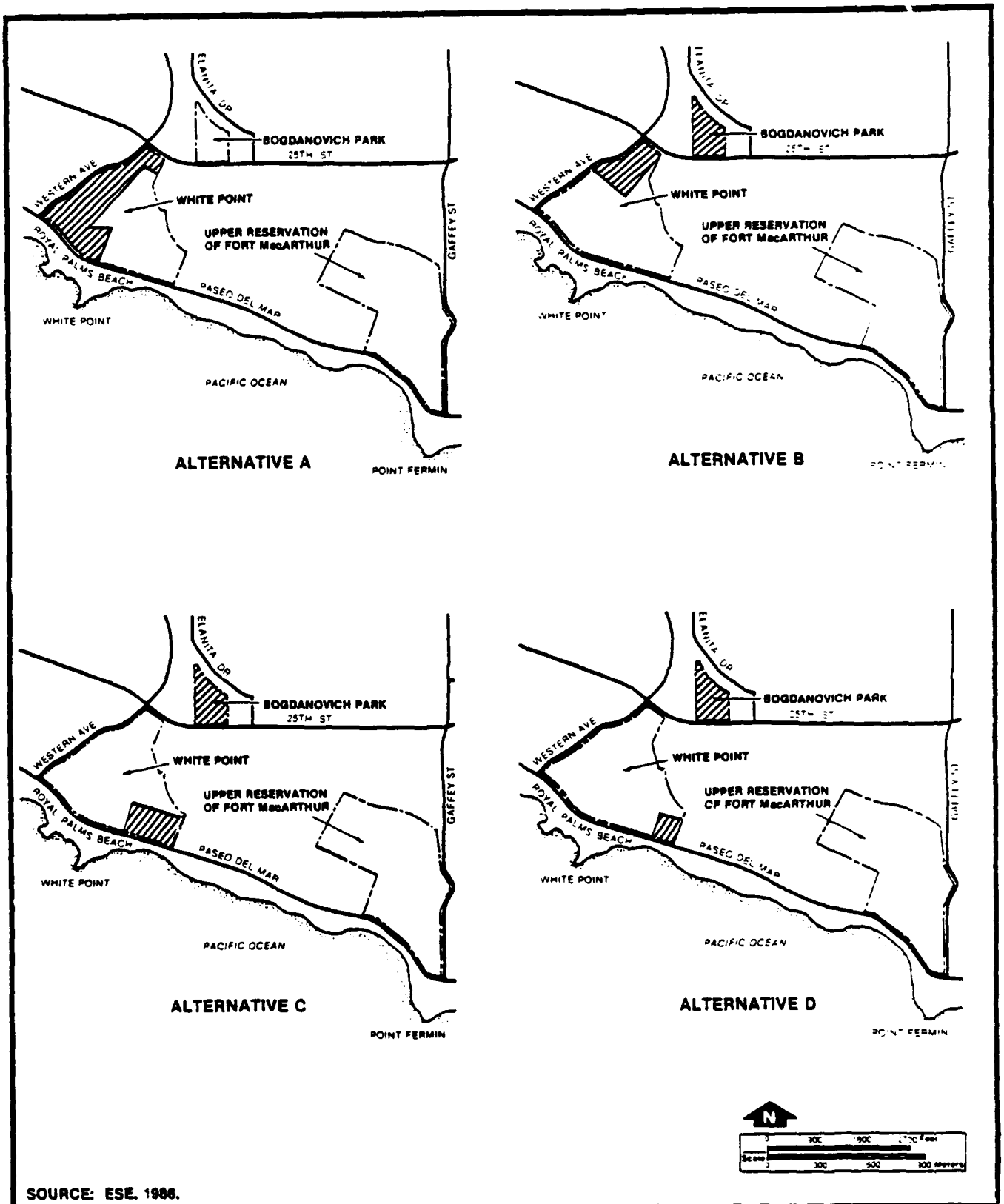
Table 2-2. Alternative Configurations for USAF Housing at White Point, Bogdanovich Park, and Upper Reservation of Fort MacArthur

Project Alternatives (see Fig. 2.5-1)	White Point		Bogdanovich Park		Upper Reservation of Fort MacArthur		Remarks
	Area (Acres)	Housing Units	Area (Acres)	Housing Units	Area (Acres)	Housing Units	
Alternative A (Buildable Acres)	50 (32)	170	0	0	0	0	50 acres in northwest portion of WP. Original proposed action (July 1984 EA).
Alternative B (Buildable Acres)	16	80	22 (16.5)	90	0	0	16 acres in northwest corner of WP and all of BP.*
Alternative C (Buildable Acres)	16	80	22 (16.5)	90	0	0	16 acres in southeast corner of WP and all of BP.
Alternative D (Buildable Acres)	9	80	22 (16.5)	90	0	0	City of Los Angeles proposal. 9 acres in southeast corner† of WP and all of BP.
Alternative E	16	80	0	0	21	90	16 acres in northwest corner of WP* and 21 acres at UFM.**
Alternative F	16	80	0	0	21	90	16 acres in southeast corner of WP and 21 acres at UFM.**
Alternative G	9	80	0	0	21	90	9 acres in southeast corner of WP† and 21 acres at UFM.**
Alternative H (Buildable Acres)	0	0	22 (16.5)	80	21	90	22 acres at BP and 21 acres at UFM.**

*The requirement for 16 buildable acres may require USAF to revert additional acres.
†USAF does not concur because 9 acres is not sufficient for housing compatible with local density.
**The USAF does not concur with this alternative due to the need to relocate numerous existing uses at UFM and the high cost of demolition associated with removal of the existing buildings. These demolition costs were not included in funds appropriated by Congress.

NOTE: The number of units is for planning purposes only; actual mix may differ slightly.

Source: ESE, 1986.



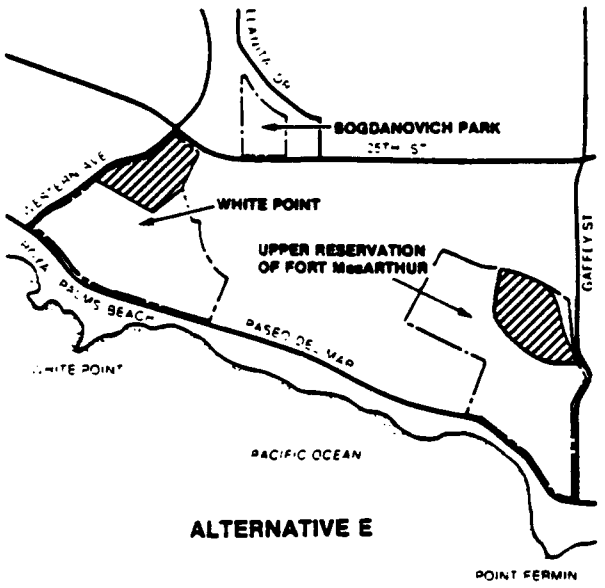
SOURCE: ESE, 1986.

Figure 2-2 (Page 1 of 2)
HOUSING PROJECT ALTERNATIVE SITING LOCATIONS

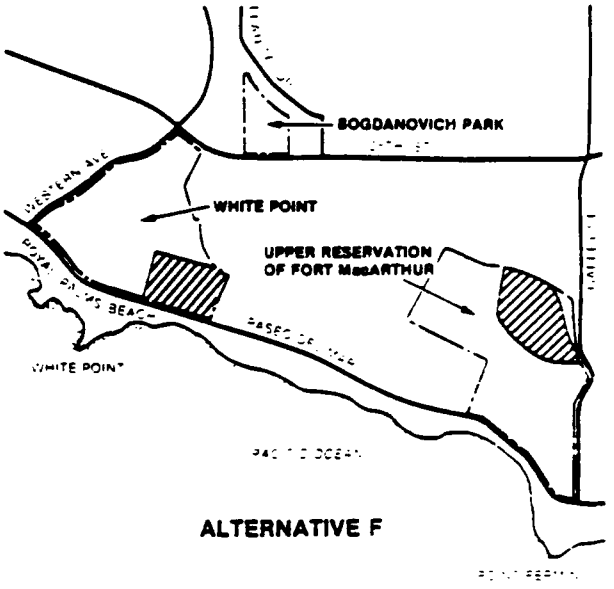
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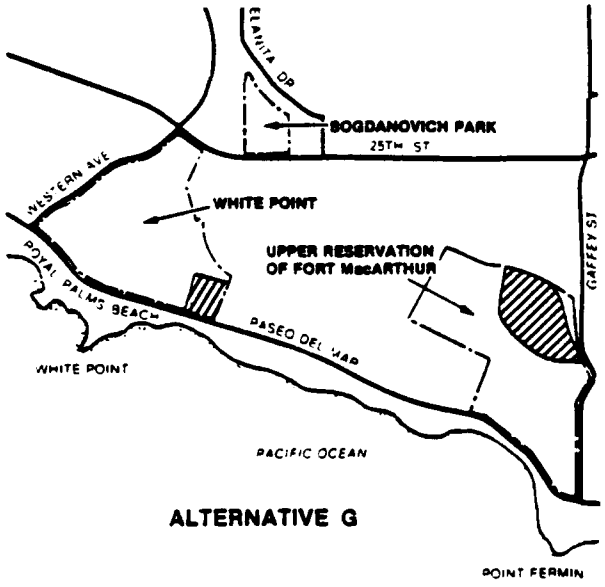
Housing Project, San Pedro, California



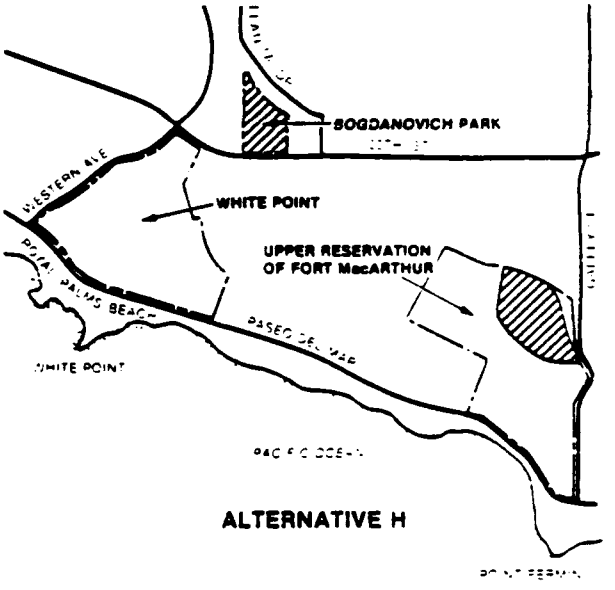
ALTERNATIVE E



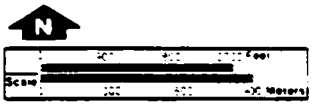
ALTERNATIVE F



ALTERNATIVE G



ALTERNATIVE H



SOURCE: ESE, 1986.

Figure 2-2 (Page 2 of 2)
HOUSING PROJECT ALTERNATIVE SITING LOCATIONS

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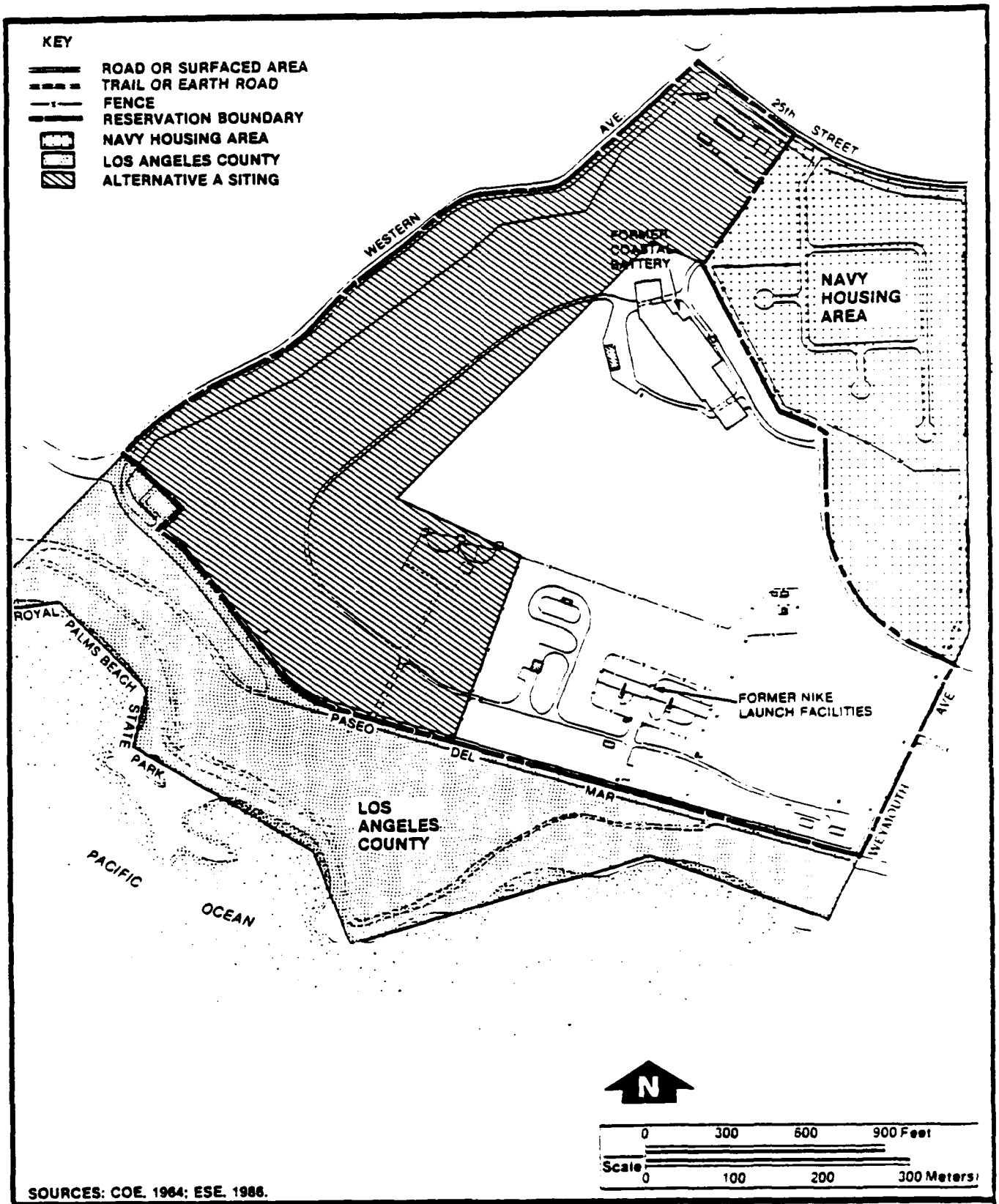
detached housing units on a 50-acre parcel of WP. Figure 2-3 shows the portion of WP that was proposed for this development. As shown in Figure 2-3, this parcel is bounded to the west by Western Ave., to the north by 25th St., and to the south by Paseo del Mar. This parcel does not include any of the former Coastal Battery (Coastal Battery No. 127) or the former NIKE missile facilities.

This alternative involves the construction of the 170 units in three clusters on three terraces which exist along the northwestern portion of WP. Due to the terrace slopes, the buildable acreage is 32 acres. Implementation of Alternative A would result in an average density of approximately 5.3 du/acre.

2.2.2 ALTERNATIVES INVOLVING WHITE POINT (WP) AND BOGDANOVICH PARK (BP)

2.2.2.1 ALTERNATIVE B--16 ACRES IN NORTH WP AND 22 ACRES AT BP

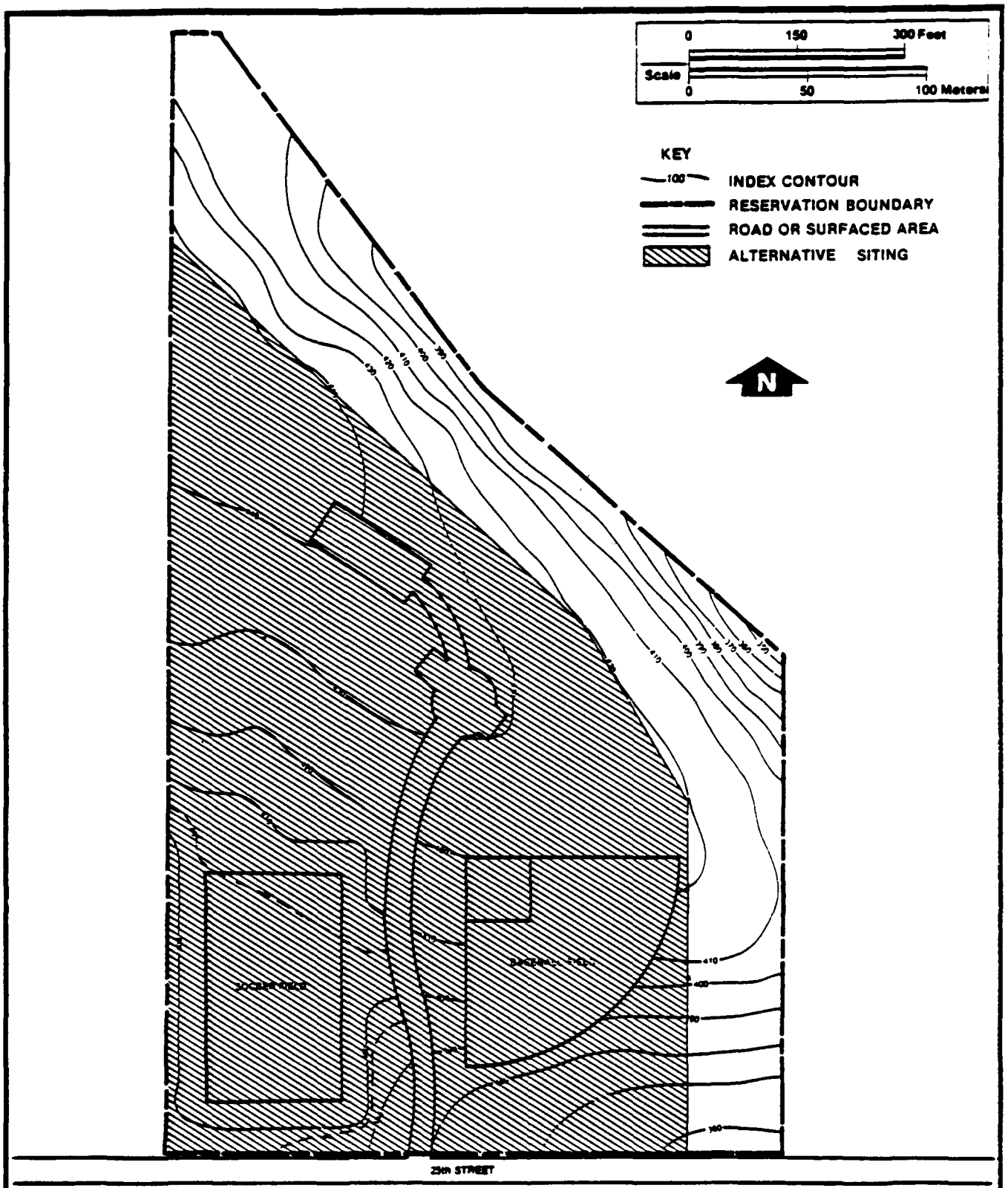
As an alternative to loss of area in the WP site to accommodate the 170 units required, the City of Los Angeles offered a split site at BP and WP as an alternative to the Proposed Action. BP is a developed city park of approximately 22 acres located approximately 1,000 ft northeast of the WP site on the north side of 25th St. The buildable area at BP is approximately 16.5 acres; Figure 2-4 shows the development siting on BP. The site would be converted to residential area to reduce the requirement for land at WP. Included in the city's offer were the conditions that the USAF relocate the athletic fields and remove the national defense reversionary clauses from the deeds to the remainder of WP and to the portion of UFM controlled by the Los Angeles Department of Parks and Recreation. The USAF will contribute to the cost of replacement fields on land provided by the city, provided sufficient funds remain after the contracts for construction are let and the construction cost of the housing to the government is reasonably fixed. No funds for replacement fields are included in the project budget, because no funds were needed for the WP site originally planned. BP was not originally considered for this project precisely because, unlike WP, it had been developed and was in use. The USAF will support the city's



SOURCES: COE, 1964; ESE, 1986.

Figure 2-3
ALTERNATIVE A: WHITE POINT SHOWING SITING ON 50 ACRES IN THE NORTHWEST PORTION

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SOURCE: ESE, 1986.

Figure 2-4
ALTERNATIVES B, C, D, AND H: BOGDANOVICH PARK SHOWING HOUSING SITING

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efforts to have the reversionary clauses removed from the property deed for the remainder of WP.

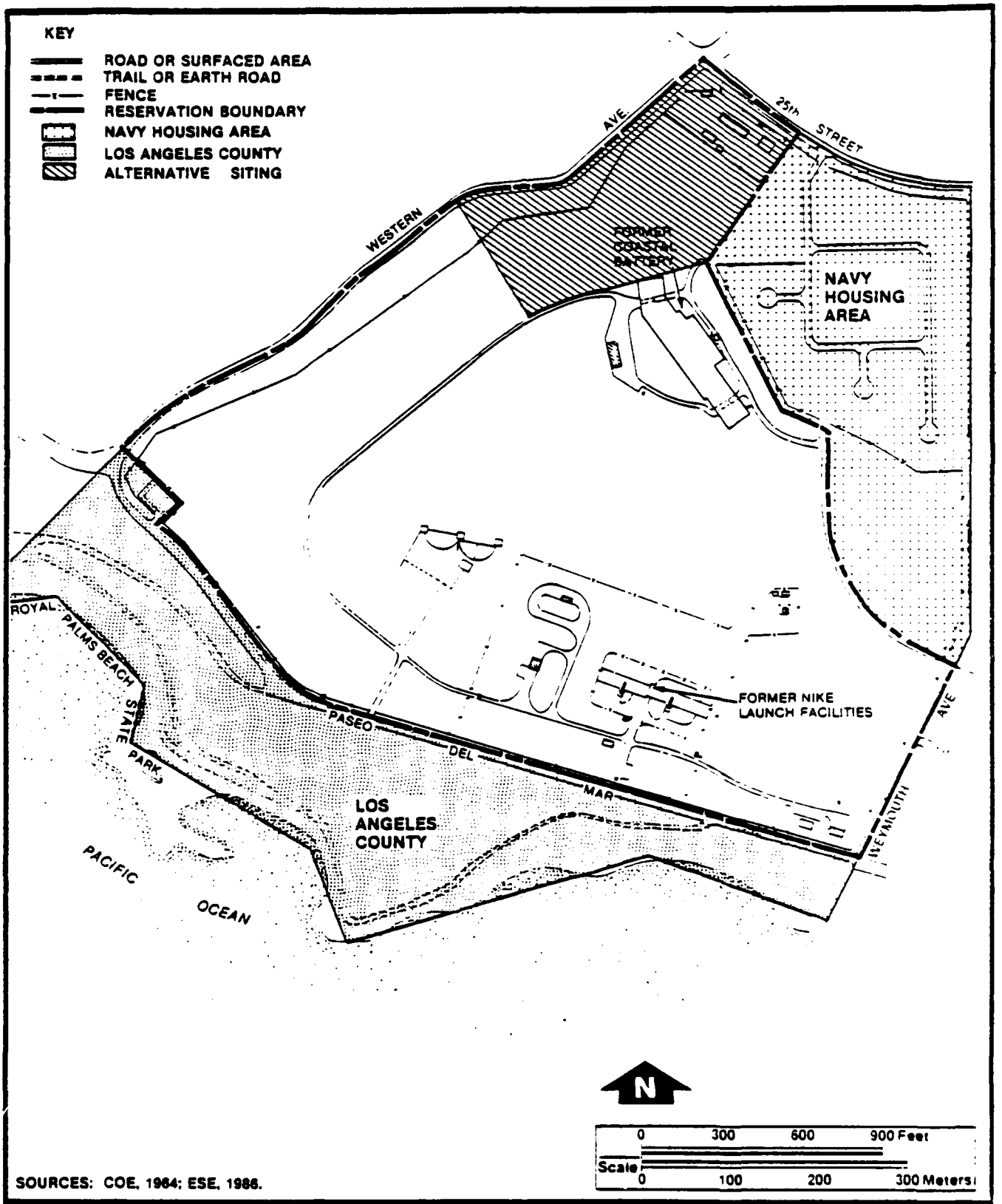
This alternative includes construction of 80 units (5 du/acre) in the northwest corner of WP adjacent to the existing Navy officer housing at the intersection of Western Ave. and 25th St. (Figure 2-5). The requirement for 16 buildable acres may require the USAF to revert additional acres. The remaining 90 units at BP (approximate density 5.5 du/acre) would be constructed across 25th St. The siting on BP includes all the area within the boundary except the portion along the northern and eastern portion of the site, which exhibits a sharp elevational gradient.

2.2.2.2 ALTERNATIVE C--16 ACRES IN SOUTH WP AND 22 ACRES AT BP

This alternative proposal involves construction of 80 housing units on 16 acres in the southeast portion of WP (5 du/acre) and 90 housing units on 22 acres (16.5 buildable acres) at BP (5.5 du/acre). Figure 2-6 shows the proposed siting for this housing at WP. The proposed siting on WP is similar to the area for the Proposed Action (see Section 2.1) although the area is reduced by 60 percent and thus does not extend as far west along Paseo del Mar. The siting at BP is identical to Alternative B (see Figure 2-5).

2.2.2.3 ALTERNATIVE D--9 ACRES IN SOUTH WP AND 22 ACRES AT BP

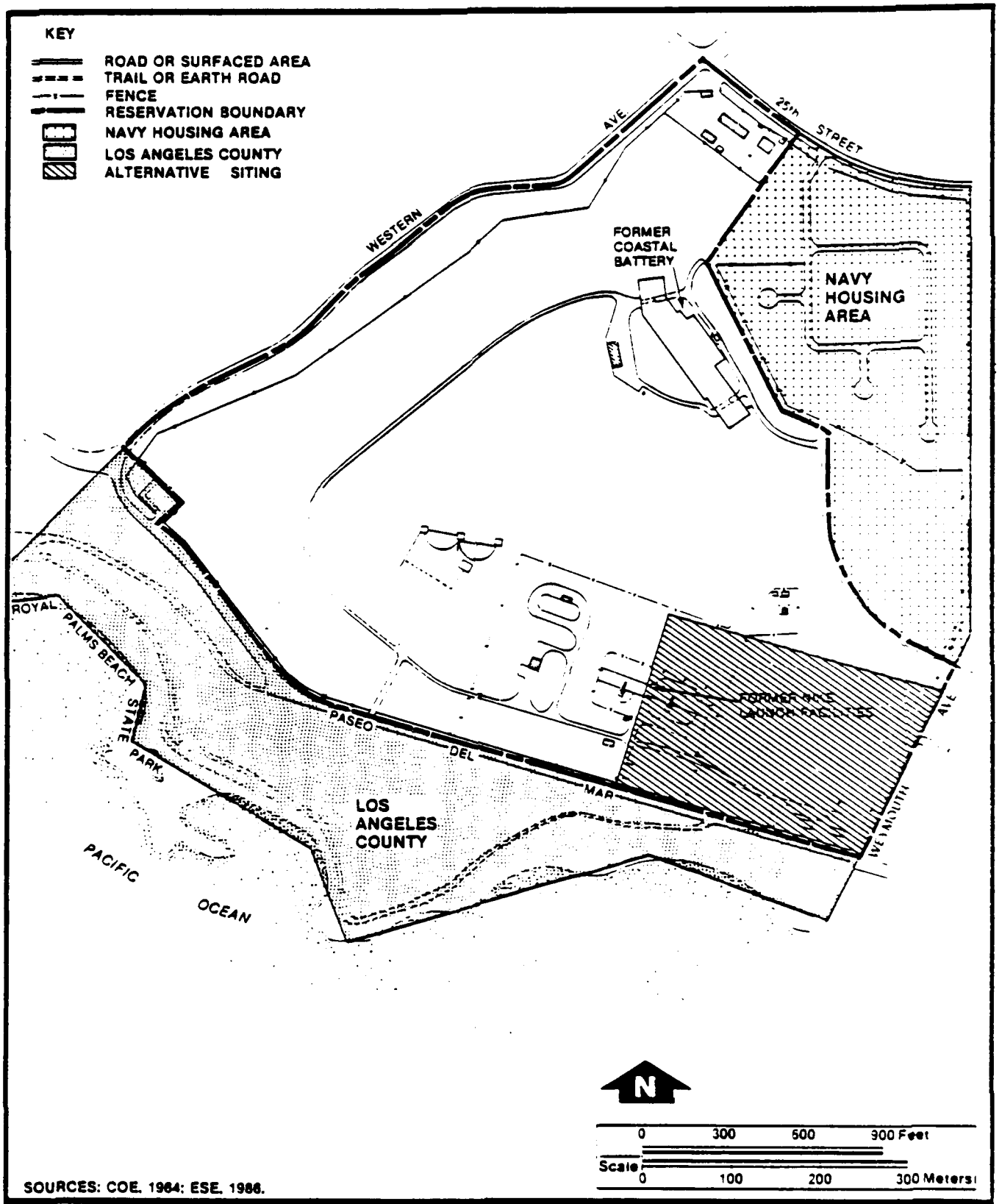
This alternative was offered by the City of Los Angeles. This scenario involves the construction of 80 housing units on 9 acres at WP (9 du/acre) and 90 units on 22 acres (16.5 buildable) at BP (5.5 du/acre). As shown in Figure 2-7, the proposed 9-acre site on WP is limited to the extreme southeast corner of the site at the intersection of Paseo del Mar and Weymouth Ave. The siting on BP is identical to Alternative B (see Figure 2-5). The USAF does not concur with this proposal as the 9 acres is not sufficient for a housing density compatible with the surrounding residential development (across Weymouth Ave.).



SOURCES: COE, 1964; ESE, 1986.

Figure 2-5
ALTERNATIVES B AND E: WHITE POINT SHOWING SITING ON 16 ACRES IN THE NORTHWEST CORNER

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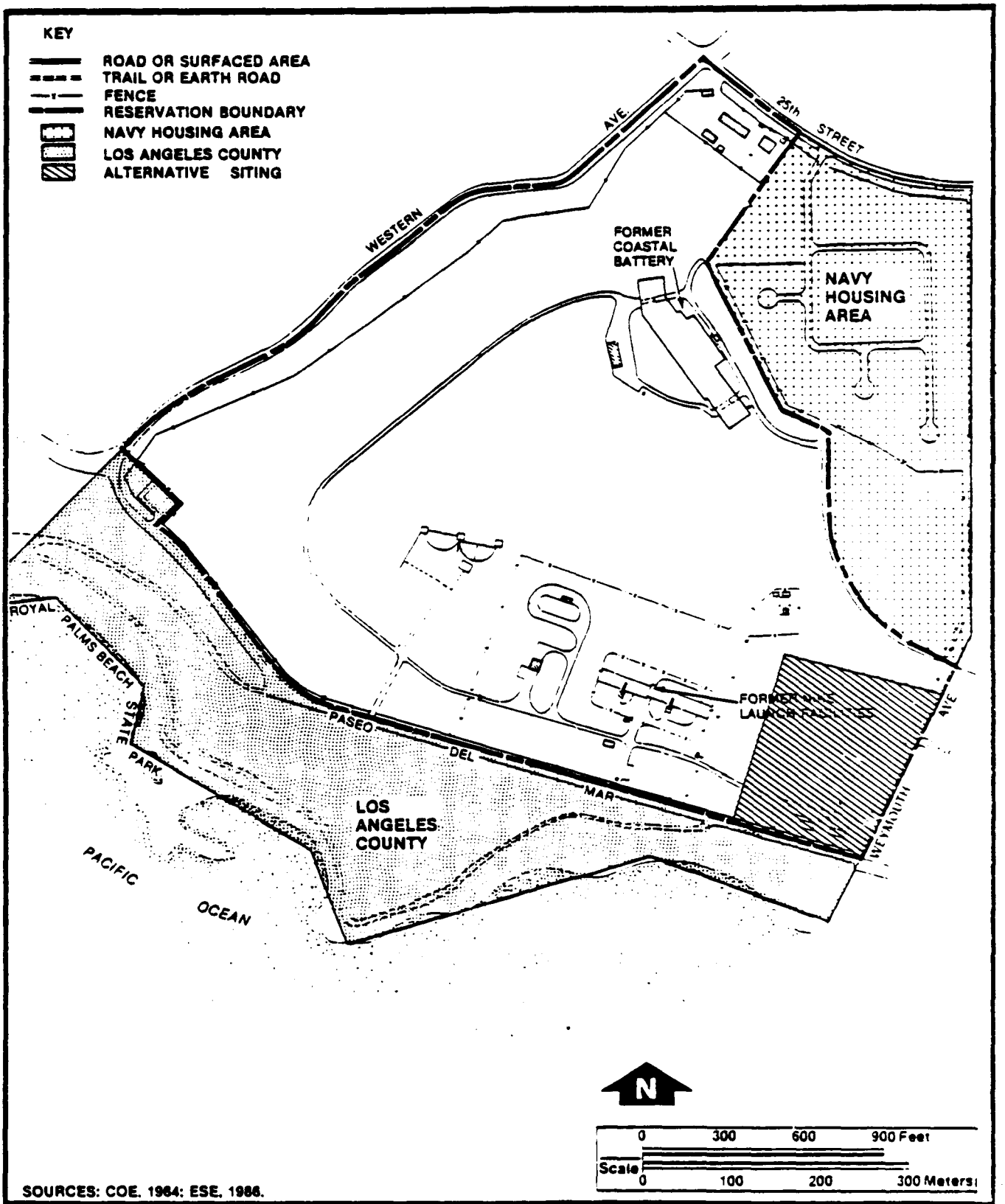
SOURCES: COE, 1984; ESE, 1986.

Figure 2-6
ALTERNATIVES C AND F: WHITE POINT SHOWING SITING ON 16 ACRES IN THE SOUTHEAST CORNER

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SOURCES: COE, 1984; ESE, 1986.

Figure 2-7
ALTERNATIVES D AND G: WHITE POINT SHOWING SITING ON 9 ACRES IN THE SOUTHEAST CORNER

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2.2.3 ALTERNATIVES INVOLVING WHITE POINT (WP) AND UPPER RESERVATION OF FORT MacARTHUR (UFM)

2.2.3.1 ALTERNATIVE E--16 ACRES IN NORTH WP AND 21 ACRES AT UFM

The UFM, consisting of 111 acres, was excessed in 1975. The Los Angeles Department of Parks and Recreation received 64 acres of the land from General Services Administration (GSA) through the U.S. Department of Interior (DOI) in June 1977. There has been no real development, although the Korean Bell site and the Osgood-Farley Battery Historical Site are located on this parcel (see Figure 2-8). The World War II (WWII)-era buildings are being used by the California Conservation Corps encampment and Angel's Gate Cultural Center. The existing pool is also being utilized. One of the former batteries has been converted to an amphitheater and is being used for theater productions.

The remaining 47 acres of UFM was transferred from GSA through U.S. Department of Health, Education, and Welfare (HEW) to the Los Angeles Unified School District in June 1977. The reversionary clause for this property was waived by the government for a 30-year period. Originally, there had been plans to relocate the San Pedro High School to this site, but no funds were available to do so. The area and existing buildings currently are being used by the school district as a vocational-technical skills training center, a school bus maintenance area, auto body shop, auto maintenance shop, and a records dead storage facility (6).

Due to the reversionary clause waiver on the school district property, the Osgood-Farley Battery Historical Site, the Korean Bell site, and the Merriam-Leary and Barlow-Saxton Batteries, the land available at UFM for construction of housing consists of approximately 21 acres (see Figure 2-8). As indicated, the majority of this area is occupied by 25 to 30 former Army WWII-era administration buildings and barracks, which would require demolition prior to construction of the new housing units. Due to the age of these buildings, it is likely that many contain asbestos insulation, which is a hazardous material (carcinogen). The asbestos would require special handling and disposal. The USAF does not

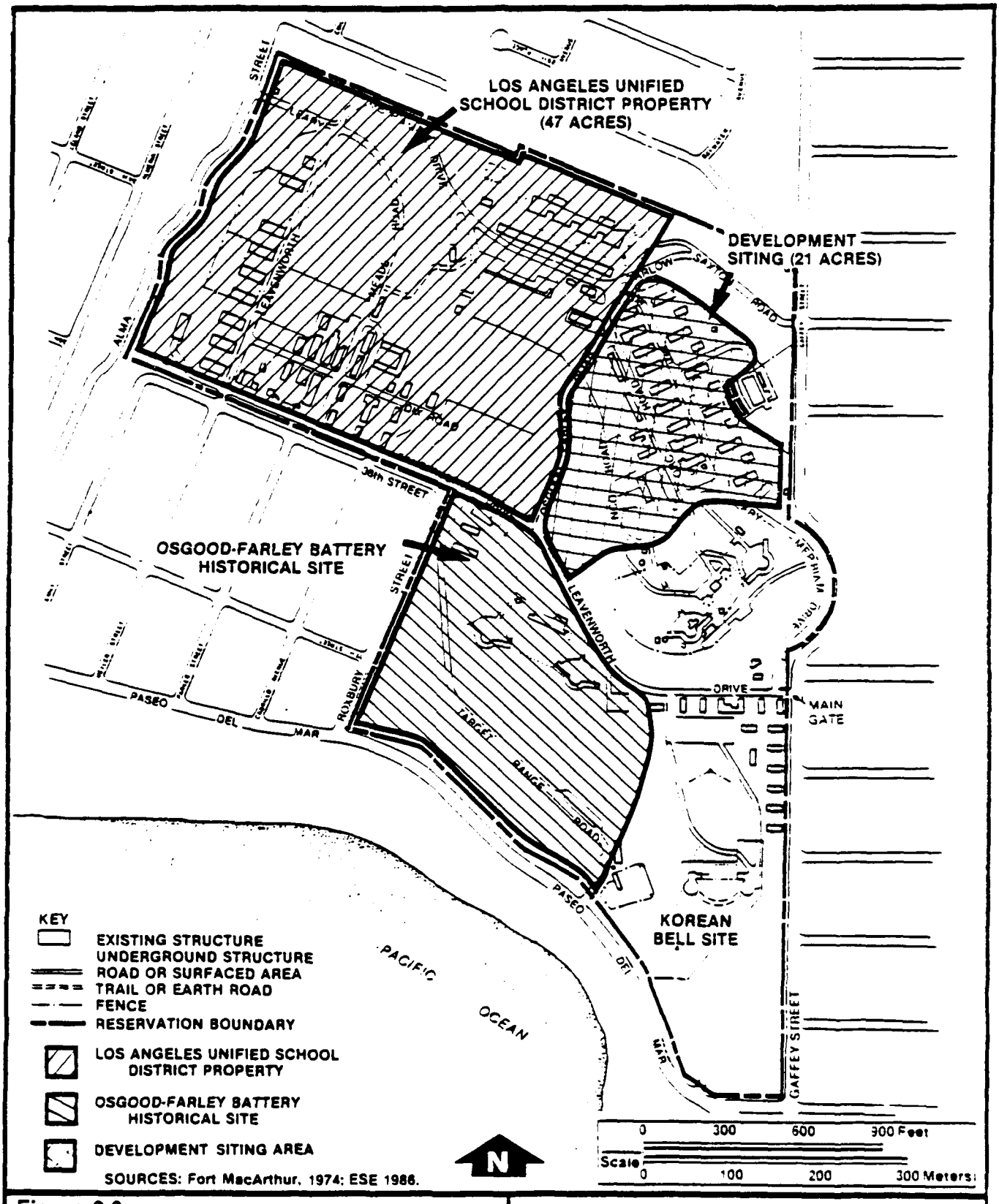


Figure 2-8
ALTERNATIVES E, F, G, AND H: UPPER RESERVATION OF FORT MacARTHUR SHOWING THE HOUSING DEVELOPMENT SITING AREA

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concur with this siting due to the need to relocate existing uses at UFM and the high cost associated with demolition of the existing buildings. The funds appropriated by Congress do not include demolition costs for this project.

The number of housing units at UFM would be 90, which would result in a density of 4.3 du/acre. The remaining 80 units would be located on 16 acres in the northwestern portion of WP (5 du/acre). The siting in the northern portion of WP would be the same as Alternative B (see Figure 2-5).

2.2.3.2 ALTERNATIVE F--16 ACRES IN SOUTH WP AND 21 ACRES AT UFM
This alternative involves 16 acres in the southeastern corner of WP (described in Alternative C; Figure 2-6) and 21 acres at UFM described in Alternative E (see Figure 2-8).

2.2.3.3 ALTERNATIVE G--9 ACRES IN SOUTH WP AND 21 ACRES AT UFM
This alternative involves the City of Los Angeles proposal of 9 acres in the southeast corner of WP (described in Alternative D; Figure 2-7) and 21 acres at UFM described in Alternative E (Figure 2-8).

2.2.4 ALTERNATIVES INVOLVING BOGDANOVICH PARK (BP) AND UPPER RESERVATION OF FORT MacARTHUR (UFM)

2.2.4.1 ALTERNATIVE H--22 ACRES AT BP AND 21 ACRES AT UFM
This alternative configuration was offered by the City of Los Angeles and is unique. The housing units would be constructed on the 22 acres at BP (80 units) and the 21 acres at UFM (90 units). These sites were described previously as Alternative B (Figure 2-5) for BP and Alternative E (Figure 2-8) for UFM. The USAF does not concur with this alternative as it would require the relocation of the existing facilities at UFM. In addition, the extensive demolition required at UFM is not included in the funds approved by Congress.

2.3 SUMMARY ANALYSIS OF ENVIRONMENTAL IMPACTS OF PROPOSED ACTION AND ALTERNATIVES

A summary comparison of the potential enviromental effects of the Proposed Action and the eight alternatives listed in Table 2-2 is presented in Table 2-3. In Table 2-3, comparisons of the effects were made for specific types of potential effects (with no mitigation) within each environmental discipline/resource area. The evaluation in Table 2-3 indicates the relative level of effect compared to all other alternatives. As indicated in Table 2-3 (solid circles and asterisk), potentially significant adverse impacts (with no mitigation) may occur to flora/fauna, land use, recreational facilities, and historical sites depending upon if the Proposed Action or a specific alternative is selected. The Draft EIS should be referred to for a more detailed discussion of the environmental impacts. The following discussions highlight the potential effects and the relative comparisons of effects for the Proposed Action and the eight alternatives by environmental discipline area.

2.3.1 TOPOGRAPHY

Based on preliminary conceptual layouts, potential excavating, filling, grading, and other earthmoving activities are not expected to significantly alter existing landforms or topographic reliefs on the affected sites. The planned buildable sites for the Proposed Action and alternatives are relatively flat to gently sloping and avoid the areas of steep relief on WP, BP, and UFM. In general, Alternatives A and B, which utilize the terraces on the northern and western portions of WP, are considered to have relatively higher potential for topographic effects because these areas may require additional grading and other measures to ensure the stability of building sites and roadways. The potential level of effects at UFM are considered relatively lower because the buildable area has been graded previously and includes existing WWII-era buildings. The potential effects of any required earthmoving activities at all sites are expected to be minimal.

Table 2-3. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Topography	- Excavating/filling/ grading	◒	●	●	◒	◒	◒	O	O	O
Geology/ Seismology	- Landslides	◒	●	◒	◒	◒	◒	O	O	O
	- Expanding soils	E	E	E	E	E	E	E	E	E
	- Ground water seepage	◒	O	O	◒	◒	O	◒	◒	O
	- Seismic movements	E	E	E	E	E	E	E	E	E
	- Erosion/flooding/tsunamis	O	◒	O	O	O	O	O	O	O
Paleontology	- Disturb fossils	O	◒	●	●	●	◒	O	O	●
Flora/Fauna	- Loss of ecological habitat	◒	●	◒	◒	O	◒	◒	O	O
	- Impact significant species	O	●*	◒	O	O	◒	O	O	O
Air Quality/ Climatology	- Construction fugitive dust	●	◒	◒	◒	O	●	●	◒	●
	- Demolition dust/inhalation	◒	O	O	◒	O	●	●	●	●
	- Vehicle emissions	E	E	E	E	E	E	E	E	E
Noise	- Construction/demolition	O	◒	◒	◒	◒	◒	O	O	◒
	- Traffic	E	E	E	E	E	E	E	E	E
Water Resources	- Increase runoff volumes	◒	●	◒	◒	◒	◒	◒	O	O
	- Change water quality	◒	●	◒	◒	◒	◒	◒	◒	O
Land Use/Zoning	- Compatability with surrounding densities	O	O	◒	O	●	◒	O	●	O
	- Compatability with planned uses	●*	●*	●*	●*	●*	◒	◒	◒	◒
	- Displacement of active uses	◒	O	●*	●*	●*	●*	●*	●*	●*

Table 2-3. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation (Continued, Page 2 of 3)

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Demography/ Housing	- Increase population densities	E	E	E	E	E	E	E	E	E
	- Impact real estate values	O	O	O	O	◒	O	O	◒	O
Employment/ Economy	- Increase in labor supply	E	E	E	E	E	E	E	E	E
	- Increase in local expenditures/activity	E↑	E↑	E↑	E↑	E↑	E↑	E↑	E↑	E↑
Public Services	- Increase demands on school, fire, police, medical facilities	E	E	E	E	E	E	E	E	E
Recreation Facilities	- Loss of existing facilities	O	O	●*	●*	●*	●*	●*	●*	●*
	- Loss of open space	●	●	◒	◒	◒	◒	◒	O	O
	- Increased demands on facilities	E	E	E	E	E	E	E	E	E
Utility Systems	- Upgrade water system	◒	O	◒	●	●	O	◒	◒	◒
	- Upgrade stormwater system	O	◒	◒	O	O	◒	O	O	O
	- Upgrade gas system	O	O	O	O	O	◒	◒	◒	◒
	- Demand on sewer, solid waste, gas, electric, and telephone systems	E	E	E	E	E	E	E	E	E
Transportation	- Increase in traffic congestion	◒	O	◒	◒	◒	◒	◒	◒	◒
	- Need for improvements	E	E	E	E	E	E	E	E	E
Historical/ Archaeological	- Impact on significant sites	●*	◒	◒	●*	◒	◒	●*	◒	◒

Table 2-3. Comparison of Environmental Effects of Proposed Action and Alternatives Without Mitigation (Continued, Page 3 of 3)

Discipline/ Resource	Types of Potential Effects	Proposed Action	Alternatives A	B	C	D	E	F	G	H
Aesthetics	- Change in vistas	●	●	◒	◒	◒	○	◒	○	○
	- Impair view	◒	◒	○	◒	●	○	◒	●	○
Coastal Zone Management	- Impact on coastal zone	●	●	◒	◒	◒	●	●	●	◒

*Potentially significant adverse impact.
†Positive or beneficial impact.

○ = relatively lower level of impact compared to other alternatives.
◒ = relatively moderate or average level of impact compared to other alternatives.
● = relatively higher level of impact compared to other alternatives.
E = relatively equivalent level of impact compared to all other alternatives.

Source: ESE, 1986.

2.3.2 GEOLOGY/SEISMOLOGY

The Proposed Action and alternative sites at WP, BP, and UFM do not have landslide problems according to geotechnical investigations of slope stabilities. Alternative A, 50 acres in northern portion of WP, is considered to have a relatively higher potential for landslide effects than are the Proposed Action and other alternatives because Alternative A involves the use of three terraces at different elevations with connecting roadways and steep gradients between the terraces. The potential for landslide problems on UFM are considered relatively lower than for the sites on the southern portion of WP and BP because the existing buildings on the UFM buildable site have similar or greater loading than the housing units and have not experienced any stability problems.

The sites at WP, BP, and UFM for all alternatives are characterized by highly expansive soils which must be removed and replaced with engineered fill. Excavation and replacement would occur only in areas of building foundations, roadways, etc. and compacted to meet load bearing specifications. Due to similarities in the sites, the potential level of effects from expansive soils are considered relatively equivalent for all alternatives, including the Proposed Action.

Because of the presence of expansive soils, ground water seepage can cause soil swelling and the potential for surface instability. During geotechnical investigations, sulfurous ground water was encountered under artesian pressure at approximately 120 ft below land surface in one boring in the eastern portion of WP. Therefore, the Proposed Action and alternatives utilizing the eastern portion of WP (Alternatives C, D, F, and G) are considered to have relatively moderate potential for seepage problems compared to the other alternatives. These potential effects are expected to be minimal since appropriate drainage control measures (e.g., French drains and buttress drains) can be installed to minimize potential impacts.

Due to the nature of the underlying geologic units at WP, BP, and UFM, there is no well-developed aquifer. No ground water in the vicinity of the sites is used for drinking water. The nearest aquifer is located in the Los Angeles Basin, approximately 3 miles north of the site. This aquifer is geologically isolated from the three sites. No impacts to ground water are anticipated due to the construction of housing.

No significant seismic hazards have been identified or are expected at any of the potential sites. Potential effects are considered relatively equivalent and minimal for the Proposed Action and all alternatives and are similar to other areas in Southern California.

Erosion, flooding, and tsunami problems are anticipated to be insignificant for the Proposed Action and alternatives, except that the potential level of erosion may be relatively higher for Alternative A which involves three terraces and more roadways in an area of WP with relatively steep slopes.

2.3.3 PALEONTOLOGY

Paleontologically important fossils have been identified in the Altamira Shale member of the Monterey Formation at several sites in the southern San Pedro region; however, no fossil sites are known to exist on WP, BP, and UFM and no significant surface fossils were observed during walkover surveys. During grading and excavation activities, the potential exists that fossils may be unearthed due to the shallow depths of the Altamira Shale strata, especially for alternatives involving BP where the shale strata is at relatively shallower depths than at the other sites. The northern portion of WP has the second shallowest depths to the shale strata among the sites. A qualified paleontologist will monitor all rock-cutting activities and any recovered specimens will be curated at appropriate institutions.

2.3.4 FLORA/FAUNA

Although the majority of WP has been disturbed by previous development and current management practices, WP is considered to have a relatively higher potential for sensitive ecological habitat than either BP or UFM. Therefore, the potential effects of loss of sensitive ecological habitat are considered relatively higher for those alternatives involving the use of WP. Alternative A, which affects the most land area as well as the area of lesser previous development, is considered to have a relatively higher level of potential effect than the other WP alternatives which involve smaller sites and/or the southern area of greatest past development. Except for the existence of Astragalus trichopodus var. lonchus (milkvetch) on WP and UFM, no significant ecological resources exist on WP, BP, or UFM, and the potential effect of the loss of any existing, ruderal (vegetation disturbed or modified by man's activities) habitat due to implementation of the Proposed Action or the alternatives is expected to be minimal.

As noted, the most significant ecological resource on WP and UFM is Astragalus which is a required food plant of the endangered Palos Verdes blue butterfly (Glaucopsyche lygdamus palosverdesensis) in its larval stage. During recent surveys, 2 Astragalus specimens have been identified in the western portion of WP and 15 specimens on UFM in an area approximately 200 ft north of the main gate along Leary Merriam Drive. The area on UFM is approximately 500 ft south of the potentially buildable site and will not be affected by development on the site.

The most suitable habitat for the legume is areas of steeper slopes. Thus, any development involving areas with steeper slopes has a relatively higher potential to adversely impact Astragalus colonization and, in turn, the endangered Palos Verdes blue butterfly. Although Alternative A provides for housing development to occur on relatively flat terraces, the total site area for Alternative A includes steeply sloped areas between the terraces as well as the areas of the two Astragalus specimens. Therefore, compared to the Proposed Action and

other alternatives, Alternative A has a relatively higher potential to impact the Palos Verdes blue butterfly and the potential effect on this endangered species is considered significant. Alternatives B and E involving the 16-acre upper terrace and some sloping areas on northern WP are considered to have a relatively moderate potential to impact the endangered butterfly. Because potentially affected areas on southern WP for the Proposed Action and alternatives other than Alternative A do not include large areas of steep slopes, the potential effect on the species is expected to be substantially lower than for Alternative A, and any potential effects are not expected to be significant.

The decline in numbers of Astragalus plants in the Palos Verdes Peninsula area is of concern. If Alternative A or another alternative in the western portion of WP (Alternative B or E) is selected for the housing development, the USAF will investigate various mitigation measures, including the feasibility of providing fencing or other physical protection around the existing Astragalus plants. In addition, following consultation with the U.S. Fish and Wildlife Service (FWS) and biological experts, the USAF will study the feasibility of developing a plan for maintenance (e.g., cultivation, weed control, etc.) of the existing Astragalus. Additionally, the FWS may wish to consider the feasibility of transplanting the Astragalus plants from WP, if Alternative A, B, or E is selected, to other areas (UFM or Friendship Park) that have more significant populations of the plants.

2.3.5 AIR QUALITY/CLIMATOLOGY

Regional air quality is not expected to be affected by the Proposed Action or the alternatives. Some increases in local air pollutant levels due to increased vehicle emissions and natural gas usage are anticipated; however, the expected increases in levels are considered relatively equivalent for the Proposed Action and alternatives and relatively minor compared to existing pollutant levels. Ride sharing, the use of flex-time for work schedules, and retrofitting out-of-state automobiles to meet California vehicle emission standards will be encouraged as measures to mitigate vehicle emissions.

Other increases in local air pollutant levels (i.e., fugitive dust and vehicular emissions) are expected due to construction activities (e.g., excavating, grading, and filling). The potential level of these increases is expected to be proportional to the size of the buildable area for each alternative. The Proposed Action and Alternatives E and F involve relatively higher acreages of buildable land, and Alternative D involves a smaller buildable area. Construction-related air quality effects will be short term and are expected to be minimal. Mitigative measures include wetting the soil to control fugitive dust and maintaining pollutant emission control devices on the engines of the construction equipment.

The Proposed Action and all alternatives will require certain demolition activities which again are expected to proportionally affect the potential levels of fugitive dust and vehicular emissions. Alternatives E, F, G, and H involve UFM and are expected to require relatively higher levels of demolition activities. Due to the age of the buildings on UFM, large quantities of asbestos insulation will likely be encountered during demolition which will increase costs for removal to avoid air inhalation/safety problems. The Proposed Action and Alternative C involve the former NIKE facilities on WP and are considered to require relatively moderate levels compared to other sites on WP and BP.

2.3.6 NOISE

The potential level of noise effects due to construction and demolition activities are expected to be relative to the levels of construction (i.e., buildable area size) and demolition as well as the proximity of the sites to surrounding neighborhoods. Due to the proximity of neighborhoods, alternatives involving BP and the northern portions of WP are considered to have a relatively higher potential for noise effects than the Proposed Action and other alternatives with sites in southern portions of WP and UFM. Although noise associated with construction in southern WP would impact the neighborhood across Weymouth Ave., the

majority of this area is surrounded by open space. Any potential noise effects due to construction are expected to be minimal and short term.

Potential noise impacts from increased traffic due to the housing development are expected to be relatively equivalent for the Proposed Action and all alternatives and insignificant compared to existing conditions.

2.3.7 WATER RESOURCES

The Proposed Action and all alternatives will increase the volumes of stormwater runoff from the sites including roadways, parking, and other impervious surfaces. Alternatives involving sites on UFM are considered to have relatively lower potential effects on the storm sewer system because runoff volumes are not expected to increase from existing levels (runoff volumes potentially may decrease), and the system has sufficient capacity even if volumes do increase. The storm sewer systems serving WP and BP are adequate to handle the potential increases in runoff volumes. The potential effects of increased stormwater runoff volumes for the Proposed Action and all alternatives are expected to be minimal.

The Proposed Action and alternatives are not expected to create significant water quality effects due to potential increases in pollutant loadings. Compared to other alternatives, Alternative A is considered to have the relatively higher level of potential effects due to its larger development area, more roadways, and greater change from existing conditions, whereas the site at UFM has a relatively lower level of potential effect. Mitigative measures to reduce pollutant runoff include the use of landscaping to control erosion, street sweeping, maintenance of stormwater catch basins, and limiting the application of fertilizers and pesticides to lawn areas.

2.3.8 LAND USE/ZONING

Preliminary conceptual layouts for the Proposed Action, Alternative A, and the alternatives utilizing a 16-acre site in the southeastern corner of WP would result in housing densities that would be compatible with existing densities in adjacent neighborhoods. The resulting densities for the alternative sites on BP and UFM are compatible with surrounding area densities. Therefore, potential developments on the sites are expected to have relatively lower effects surrounding land use. Potential densities for Alternatives B and E, which use the 16-acre alternative site on the northern portion of WP, are considered to have a relatively moderate effect on nearby neighborhoods because densities are somewhat higher than existing densities in the area. Alternatives D and G, which use the 9-acre site on southeastern WP, will create housing densities almost two times higher than existing in adjacent neighborhoods and would require attached or 2-story, multi-family units. Alternatives D and G are considered to have a relatively higher level of potential effect on surrounding land use compatibility than are the Proposed Action and other alternatives.

The City of Los Angeles has proposed to develop WP as a park in this urban area and the State of California is involved in this proposal. Therefore, the Proposed Action and Alternative A, which include the greatest number of acres on WP (40 acres or 35 percent and 50 acres or 43 percent, respectively) are considered to have relatively higher potential effects on planned, future uses of WP, compared to the other alternatives. Because BP has been developed and currently is used for soccer and baseball fields, alternatives which include the use of BP (Alternatives B, C, D, and H) are also considered to have relatively higher levels of potential impacts on planned land use. The alternatives utilizing fewer acres of WP and UFM are considered to have relatively moderate levels of potential effects. Although remaining areas of WP would still be available for park development, the Proposed Action and Alternative A may be considered to have significant effects on planned uses if state or city funding were not made available solely

on the basis of the limitations on available acreage. Also, the potential effects on planned uses for alternatives involving BP may be considered significant if the soccer and baseball field facilities are not relocated.

Alternative A involves a relatively lower level of potential effect on displacement of existing active recreational land uses than the other alternatives, whereas the Proposed Action is considered to have a relatively moderate level of effect since the community gardens would be displaced, but could be fairly easily replaced on adjacent areas of WP. All other alternatives would require the displacement of active recreational or currently utilized facilities and, thus, are considered to have a relatively higher level of potential effects. The potential impacts of the displacement of these existing uses may be considered potentially significant if relocation of the existing uses does not occur.

2.3.9 DEMOGRAPHY/HOUSING

Because sites for the Proposed Action and all alternatives are located in proximity to each other, the levels of potential effects on population densities in the San Pedro community are considered to be relatively equivalent and insignificant. Alternatives D and G, which would require multi-family housing units on the 9-acre site on southern WP, are considered to have relatively higher potential to affect real estate values in the area compared to the Proposed Action and other alternatives.

2.3.10 EMPLOYMENT/ECONOMY

The Proposed Action and all alternatives will have equivalent and positive impacts on the local economy. The prospective households represent new potential customers for local service and retail businesses in the San Pedro community. Adult, non-military members of the households may also enter the labor market in the area. Although the effect of local expenditures are not expected to be as great as for

a non-military housing project, since military personnel spend a portion of their incomes at exchanges and commissaries, surveys show that military personnel spend approximately 32 percent of their incomes for local goods and services.

2.3.11 PUBLIC SERVICES/RECREATION

Similar to any housing project, the Proposed Action and alternatives will create increased demands on public facilities such as schools, police and fire protection, and medical facilities. The potential level of the effects on police and medical facilities will be less for the military housing development than for a private development because the USAF will provide an onsite security service and military personnel and dependents will use government-provided facilities for most medical treatment. Based on contacts with appropriate agencies, local facilities and services have adequate capacity to meet the needs of the new households. Therefore, the Proposed Action and alternatives are expected to have minimial and equivalent effects on local public services.

The Proposed Action and alternatives may have three types of potential impacts on existing recreational facilites:

1. Loss of existing, actively used facilities;
2. Loss of passively used open space; and
3. Increase of demands on existing facilities.

The potential level of effects due to increased demands on existing facilities resulting from any of the development alternatives is expected to be equivalent and insignificant.

Except for the Proposed Action and Alternative A, all other alternatives would result in the loss of existing, actively used recreational facilities which may be difficult to replace. Although the Proposed Action would displace the community garden area, the gardens could be

replaced on adjacent areas. Alternatives B, C, D, and H which would involve the displacement of the soccer and baseball fields at BP are considered to have a relatively higher level of potential effect since funds may not be available to replace these actively used fields. Alternatives E, F, and G which would involve the displacement of the activities of the California Conservation Corps and the Angel's Gate Cultural Center on UFM are also considered to have relatively higher levels of potential effects because replacement of these uses may not be possible. The loss of the soccer and baseball fields at BP and facilities on UFM may be considered as potentially significant impacts if suitable replacement facilities are not made available in the area.

The soccer/football field and the baseball field at BP would be displaced by alternatives involving BP (Alternatives, B, C, D, and H). Organizations that currently utilize these fields, including the American Youth Soccer Organization (AYSO), would be forced to use facilities at other locations. The city has stated that it expects the USAF to construct replacement facilities if BP is selected for the housing but has not offered a site. The USAF will contribute to the cost of replacement fields on land provided by the city, provided there are sufficient funds remaining after the contracts for construction are let and the construction cost of the housing to the government reasonably fixed. No funds for replacement fields are included in the project budget, because no funds were needed for the WP site originally planned. BP was not originally considered for this project precisely because, unlike WP, it has been developed and it is in use. It is recognized that any BP alternative may, under present circumstances, cause some loss of field availability during the time between start of construction on houses and completion of replacement fields. There is a possibility that no replacement fields may be able to be provided due to lack of funds.

Much of WP currently is used for passive, open-space recreational pursuits. Therefore, the Proposed Action and Alternative A, which

involve the greatest land areas of WP, are considered to have the relatively higher levels of potential effects on the loss of open space compared to the other alternatives. Alternatives involving smaller areas of WP and BP are considered to have relatively moderate levels of potential effects due to the loss of open space, whereas the use of UFM is considered to have relatively lower levels of potential effects since the area has existing development. The loss of major areas of open space on WP (Proposed Action and Alternative A) is not considered to be as potentially significant as compared to the loss of the actively-used fields at BP since over half of WP would still be available as open space.

2.3.12 UTILITY SYSTEMS

Similar to any private development, the proposed USAF housing development will create additional demands on the various private and public service systems such as water, storm water, sanitary sewer, solid waste, natural gas, electric, and telephone. Based on contacts with local agencies and companies providing these services, the sanitary sewer, solid waste, electric, and telephone systems which serve WP, BP, and UFM have adequate capacity to meet the increased demands and potential effects on these systems from the Proposed Action and all alternatives. The impacts are expected to be equivalent and insignificant.

The potable and fire-fighting water supply systems serving the southern portion of WP and BP may need to be upgraded to meet the new demands. Therefore, Alternatives C and D, which involve sites at both the southern portion of WP and BP, are considered to have relatively higher levels of potential effects compared to other alternatives. The Proposed Action and Alternatives B, F, G, and H which involve only the sites where water system upgrading may be required, are considered to have relatively moderate levels of potential effects. No upgrading of water supply system will be required for alternatives involving sites on northern WP and/or UFM.

Although some minor modifications may be needed, alternatives involving sites in the northern portion of WP are considered to have a relatively moderate level of potential effects on stormwater drainage systems because the systems in the area of Paseo del Mar and Western Ave. may require a greater level of improvement compared to the Proposed Action and other alternatives. Adequate natural gas service is available at all sites on WP and BP. Natural gas supply currently is not available to the UFM site and these facilities would have to be installed for Alternatives E, F, G, and H. Overall, the potential level of effects due to improvements in water supply, storm water, and natural gas systems are expected to be minimal.

2.3.13 TRANSPORTATION

Because all involve the addition of households to the area, the Proposed Action and alternatives would create some increases in traffic on several local roads; however, the increases are expected to be minor relative to existing traffic levels and would not change the level of service on any road or intersection. Compared to the Proposed Action and other alternatives, Alternative A is expected to have a relatively lower level of potential effect on Gaffey St. and the San Pedro business district. The Proposed Action and alternatives will not require improvements in the local roadway system except for possibly minor improvements such as turn lanes at the entrances to the potential sites. Ride sharing and use of flex-time work scheduling will be strongly recommended to minimize any traffic impacts.

2.3.14 HISTORICAL/ARCHAEOLOGICAL

In varying degrees, the Proposed Action and alternatives may affect historical/archaeological sites which preliminary studies indicate to be probably eligible for inclusion in the National Register of Historic Places. The Proposed Action and Alternatives C and F (16-acre site on southern WP) are considered to have relatively higher levels of potential effects on cultural resources because development in this area may impact these historical/archaeological sites. Although other NIKE

facilities exist in the region, the presence of both NIKE and Coastal Battery facilities at one location represents a unique historic, resource, and the loss of the NIKE facility in this setting may be considered a potentially significant impact. None of the alternatives including the Proposed Action affect the Coastal Battery facilities.

The level of potential effects for alternatives involving other areas of WP and BP are considered relatively moderate compared to the Proposed Action and Alternatives C and F because, while these other alternatives may impact archaeological sites, the NIKE facilities are not impacted. The level of potential effects on cultural resources is considered relatively lower for UFM alternatives because the identified sites on UFM have been completely or essentially destroyed by previous developments. A qualified archaeologist will monitor all surface cutting activities at the Proposed Action or Alternative Sites and any artifacts will be curated at appropriate museums.

2.3.15 AESTHETICS

Both WP and BP are relatively vacant, open space areas; therefore, alternatives utilizing these areas would create a change in views or vistas. The Proposed Action and Alternative A involve the use of the greater areas of WP and, thus, are considered to have a relatively higher level of potential effect on changing vistas in the area. Alternatives using smaller areas of WP, especially in the northern portion, and BP are considered to have relatively moderate levels of potential effects. Potential vista effects for UFM are considered relatively lower compared to the other alternatives due to current development on the site.

Alternatives D and G are considered to have relatively higher potential effects due to impairment of views from existing residences in nearby areas since implementation of these alternatives will probably involve multi-story, attached housing units on the 9-acre site on southern WP. The potential impairment of views for the Proposed Action and

alternatives involving other sites on WP and BP are considered relatively moderate whereas the use of UFM is considered to have a relatively lower level of potential effects. Any potential effects from impairment of view are expected to be relatively localized.

2.3.16 COASTAL ZONE MANAGEMENT

California's coastal management plans and coastal zone were established by the California Coastal Act of 1976, as amended, and its implementing regulations. Because 25th St. is the inland boundary of the zone in the area, WP and UFM are located within the coastal zone and BP is outside the zone. Therefore, alternatives involving sites on either WP or UFM have the potential to impact the coastal zone. Proposed Action and alternatives involving WP only (Alternative A) and WP and UFM (Alternatives E, F, and G) are considered to have a relatively higher potential to affect the coastal zone since all the development is within the coastal zone. Alternatives B, C, D, and H, which involve BP such that a portion of the development is outside the coastal zone, are considered to have a relatively moderate potential to impact the coastal zone. The Proposed Action and all alternatives, except Alternative A, are found by the USAF to be consistent to the "maximum extent practicable" with the CCMP in accordance with the Federal Coastal Zone Management Act of 1972 as amended and the NOAA implementing regulations.

3.0 CONSISTENCY DETERMINATION

In accordance with the Federal Coastal Zone Management Act of 1972, as amended, and the NOAA implementing regulations, the USAF finds that the Proposed Action and all alternatives, except Alternative A, for construction on WP, BP, and UFM in San Pedro, CA, are consistent to the "maximum extent practicable" with the California Coastal Management Plan (CCMP) as enacted by the California Coastal Act of 1976, as amended, and approved by NOAA. The specific Coastal Planning and Management Policies established by the 1976 act are listed in Table 3-1. Those sections found to be applicable to the Proposed Action or alternatives are discussed in the following paragraphs and are annotated in the table.

3.1 THE AFFECTED ENVIRONMENT

WP and UFM are located south of 25th St., the inland boundary of the California Coastal Zone in this area and are within the Coastal Zone. BP is located north of 25th St. and, therefore, is not within the Coastal Zone.

Special sections of the California Coastal Plan are Public Access, Recreation, Marine Environment, Land Resources, Development, and Industrial Development. The specific articles and policies established by the California Coastal Act are listed in Table 3-1. The environmental impacts associated with the Proposed Action or alternatives for those sections which have been indicated in the table as being applicable are discussed in Section 3.2. The Draft EIS should be referred to for a detailed discussion of other potential environmental impacts other than the coastal associated impacts.

Table 3-1. Planning and Management Policies of the California Coastal Act of 1976

Section	Article and Policy
	Article 1--General
30200	Policies as standards; resolution of policy conflicts.
	Article 2--Public Access
30210*	Access; recreational opportunities; posting.
30211*	Development not to interfere with access.
30212	New development projects; provision for access; exceptions.
30212.5	Public facilities; distribution.
30213*	Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals.
30214	Implementation of public access policies; legislative intent.
	Article 3--Recreation
30220*	Protection of certain water-oriented activities.
30221*	Oceanfront land; protection for recreational use and development.
30222	Private lands; priority of development purposes.
30222.5	Oceanfront land; protection for aquaculture use and development.
30223*	Upland areas.
30224	Recreational boating use; encouragement; facilities.
	Article 4--Marine Environment
30230*	Marine resources; maintenance.
30231*	Biological productivity; wastewater.
30232	Oil and hazardous substance spills.
30233	Diking, filling, or dredging.
30234	Commercial fishing and recreational facilities.
30235	Revetments; breakwaters; etc.
30236	Water supply and flood control.
30237	Habitat conservation plan; Bolsa Chica.

Table 3-1. Planning and Management Policies of the California Coastal Act of 1976 (Continued, Page 2 of 2)

Section	Article and Policy
	Article 5--Land Resources
30240*	Environmentally sensitive habitat areas; adjacent developments.
30241	Prime agricultural land; maintenance in agricultural production.
30241.5	Agricultural lands; variability of.
30242	Lands suitable for agricultural use; conversion.
30243	Productivity of soils and timberlands; conversions.
30244*	Archaeological or paleontological resources.
	Article 6--Development
30250	Location; general.
30251*	Scenic and visual qualities.
30252	Maintenance and enhancement of public areas.
30253*	Safety, stability, pollution, energy conservation, visitors.
30254	Public works facilities.
30254.5	Sewage treatment plants and conditions.
30255	Priority of coastal-dependent developments.
	Article 7--Industrial Development
30260	Location or expansion.
30261	Use of tanker facilities; liquified natural gas terminals.
30262	Oil and gas development.
30263	Refineries or petrochemical facilities.
30264	Thermal electric generating plants.
30265	Offshore oil transport and refining.
30265.5	Coordination of offshore oil transport and refining activities.

*Section applicable to the proposed project.

Sources: California Coastal Commission, 1984; ESE, 1986.

3.1.1 WHITE POINT (WP)

3.1.1.1 PUBLIC ACCESS

The WP area is currently fenced, preventing access to or passage through the site. Limited recreational opportunities are provided by the community gardens (i.e., small individual vegetable plots) operated by the City of Los Angeles Department of Parks and Recreation. Nature field trips are also conducted on a case-by-case basis for local schools and groups. Uncontrolled use of WP occurs as the public can gain access to the site through holes and gaps in the fence.

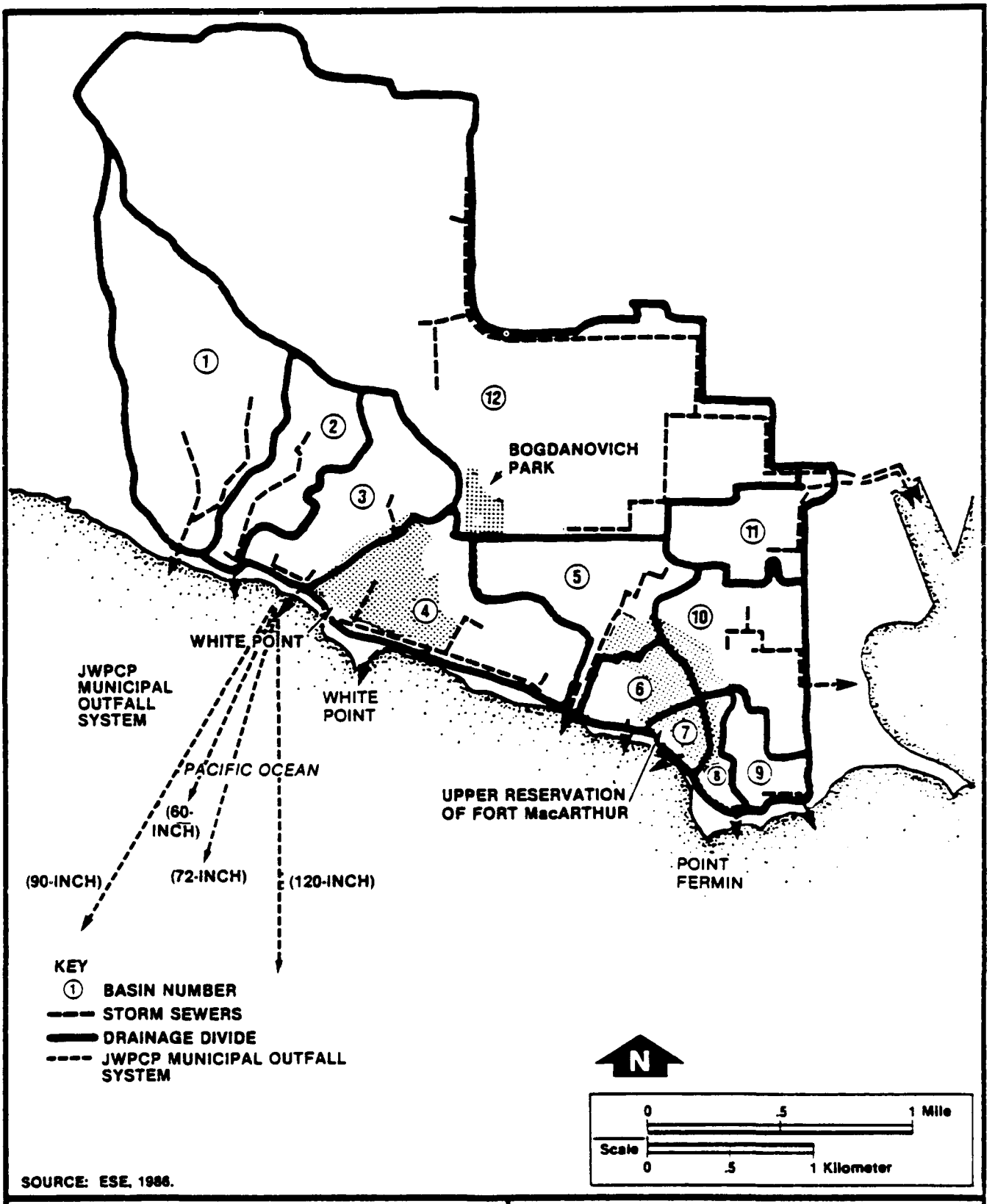
WP is separated from the shoreline by Paseo del Mar. Currently, there exists a direct access to the sea for the public at Royal Palms State Beach, which is directly southwest of WP.

3.1.1.2 RECREATION

Currently, there is limited public access to WP for recreation. Upland areas offer visual open space and ocean vistas for those members of the public who are willing to gain access through holes and gaps in the fence. Other use is restricted to the limited number of people who use the community gardens and nature field trips.

3.1.1.3 MARINE ENVIRONMENT

The marine environment currently receives the surface water runoff which drains from the site into an existing storm sewer system. Approximately 105 acres of the WP site is within Basin 4 (see Figure 3-1), a 211-acre drainage basin. The remaining 10 acres is in Basin 3, a 164-acre basin. Runoff from the site within Basin 4 is collected by a storm sewer system and discharges to the ocean at a 60-inch-diameter pipe outfall. Runoff from the site within Basin 3 is also collected by a storm sewer system and discharges to the ocean via a 72-inch-diameter outfall pipe. A 10-year, 24-hour rainfall of 5.5 inches would result in an estimated runoff volume for Basin 4 of 3.8 inches, or approximately 67 acre-ft (see Table 3-2). Runoff from Basin 3 for the same rainfall event is approximately 55.0 acre-ft.



SOURCE: ESE, 1986.

Figure 3-1
DRAINAGE BASINS, STORM SEWER SYSTEMS, AND JWPCP MUNICIPAL OUTFALL SYSTEM

Coastal Consistency Determination
Air Force Space Division
Housing Project, San Pedro, California

Table 3-2. Drainage Basin Areas

Basin	Area (Acres)
1	368
2	125
3	164
4	211
5	175
6	64
7	23
8	26
9	52
10	166
11	108
12	1,422
Total All Basins	2,904

Source: ESE, 1986.

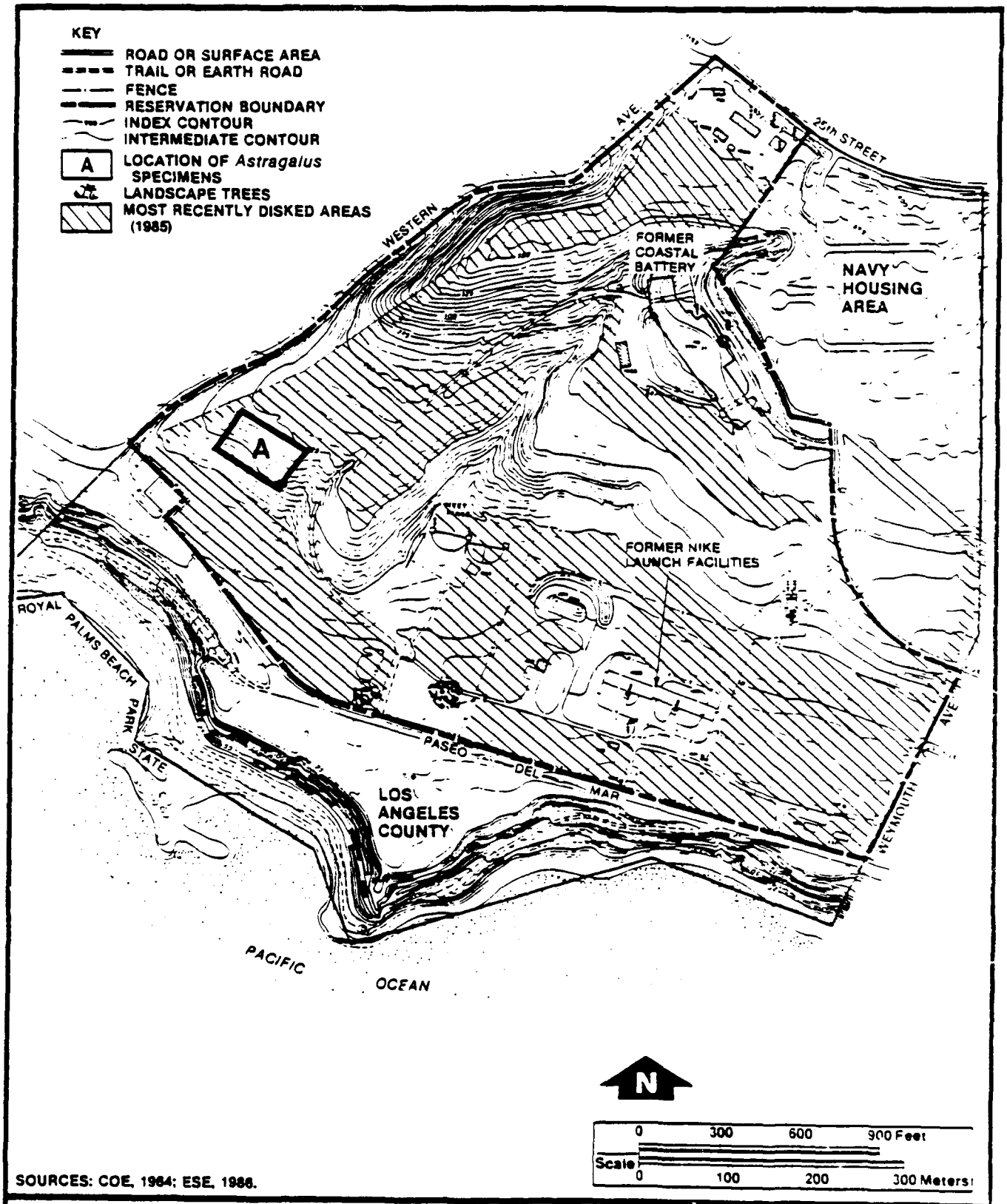
An underwater park of thermal vents which flow from the ocean bottom exists offshore at WP. These thermal vents are likely geologically-related to the warm springs that formerly existed in the cliff area of WP. These underwater vents are important due to the diversity of marine life associated with the vents.

The Joint Water Pollution Control Plant (JWPCP), a wastewater treatment facility of Los Angeles County Sanitation District (LACSD), discharges treated municipal wastes to the Pacific Ocean approximately 1.8 miles offshore at WP (see Figure 3-1). The average discharge is approximately 360 million gallons per day (MGD). Pollutant loading from the discharge has been estimated to be approximately 40,000 tons per year (tons/yr) of total suspended solids (TSS).

3.1.1.4 LAND RESOURCES

No State of California or Federally protected species were found at WP during 1974, 1984, 1985, and 1986 surveys. In addition, surveys in 1983, 1984, 1985, and 1986 of the entire Palos Verdes Peninsula have found no endangered Palos Verdes blue butterfly (Glaucopsyche lygdamus palosverdesensis). However, a potentially significant plant, Astragalus trichopodus var. lonchus, commonly called ocean milkvetch, was identified on the site. This plant is the food source of the endangered Palos Verdes blue butterfly.

Astragalus specimens known to have occurred at WP were identified in the western portion of the site (see Figure 3-2) on a relatively steep ground which has not been disked recently. Only three specimens have been known on WP since Spring 1985; currently only one has survived and is in poor health. Astragalus resources currently available for utilization by the Palos Verdes blue are nonexistent at WP (1). Based on the most recent survey (February 1986), this condition is not expected to change without direct intervention. The most significant and nearest Astragalus resources to WP are found at Friendship Park, located approximately 1 mile to the northwest. This resource, which is



SOURCES: COE, 1984; ESE, 1986.

Figure 3-2
WHITE POINT — ECOLOGICAL FEATURES

Coastal Consistency Determination

Air Force Space Division

Housing Project, San Pedro, California

also declining in numbers, is represented by fewer than 100 Astragalus plants. A recent (February 1986) survey has revealed that approximately 15 Astragalus plants also exist on UFM (see discussion in Section 3.1.3.4 which is approximately 0.75 mile east of WP.

Locations of other resources that have been utilized by the Palos Verdes blue have occurred in the Agua Amarga Canyon area of Palos Verdes Estates and Frank Hess Park, and a small area immediately west of Friendship Park along Palos Verdes Drive East. Recent inspection (December 1985 and February 1986) of these sites has revealed that numbers of Astragalus plants have become critically low or that the plants have disappeared.

Two historical sites (the NIKE launchers and the Sepulveda homesite) have been identified and are probably eligible for inclusion in the National Register of Historic Places. Five archaeological sites have been identified onsite, and preliminary results on field studies indicate that four of the five sites are probably eligible for inclusion in the National Register of Historic Places. The other site may be eligible. Potential exists for significant paleontological deposits in the Altamira Shale member of the Monterey formation.

3.1.1.5 DEVELOPMENT

Because WP is a relatively vacant, open space area, some residents of nearby neighborhoods are permitted a view of not only WP but also the Pacific Ocean. Some surrounding neighborhoods do not have an ocean view because of the bluff along Western Ave. on the WP site.

The results of Woodward-Clyde Consultants (14) reports indicate that the site has no restrictions for building houses, provided surface materials are excavated and replaced with engineered fill. Soil borings on the site do not indicate any evidence of current or past deep slides.

3.1.2 BOGDANOVICH PARK (BP)

BP is not located within the California Coastal Zone. However, storm-water runoff from the site is collected and discharged to the Los Angeles Harbor by the storm drainage system. BP is within Basin 12, a 1,422-acre drainage basin (see Figure 3-1). Runoff from BP is collected by a 60-inch-diameter pipe. The outfall for Basin 12 is an 8-ft, 5-inch x 10-ft reinforced concrete box culvert. The 10-year, 24-hour runoff volume for Basin 12 is approximately 473 acre-ft, 6.65 acre-ft of which is from the 23-acre BP site.

3.1.3 UPPER RESERVATION OF FORT MacARTHUR (UFM)

3.1.3.1 PUBLIC ACCESS

The southern boundary of the 111-acre UFM area borders the Pacific Ocean cliffs, separated only by Paseo del Mar. The area is enclosed by fence, but public access is available at entrances located along Gaffey St. A number of community recreational and cultural activities use the buildings and facilities remaining from the military ownership. Although none of the current activities are coastal dependent, visitors have an onsite view of the ocean from the central and southern portion of the site obstructed only by the few buildings.

3.1.3.2 RECREATION

Ownership of the UFM area currently is divided between the City Parks and Recreation Department and the Los Angeles Unified School District. Both have plans for development of their respective parcels, but neither has funds available. The UFM area, however, is currently being used and includes the following onsite facilities: a basketball court; playground; the Korean Bell Monument; and the Osgood-Farley Bunker, which houses a museum. The Merriam-Leary Battery has been converted to an open amphitheater. Also, the California Conservation Corps maintains facilities in barracks in the northeast portion of the site, a cultural center has been developed in buildings in the same area, and a youth hostel is expected to relocate to the park. None of the current uses at UFM are coastal related.

3.1.3.3 MARINE ENVIRONMENT

The UFM site has a relation to marine resources which is similar to the WP area. Storm drainage from the majority of the 111-acre UFM area flows to the Pacific Ocean and the remaining area, the northeast portion, drains easterly to Los Angeles Harbor. The ocean-bottom thermal vents which exist offshore at WP (approximately 1 mile to the west) are not known to exist offshore at UFM. No underwater parks are known to exist offshore at UFM.

The UFM area contributes surface runoff to four different storm sewer systems, including Basins 6, 7, 8, and 10 (see Figure 3-1). Approximately 85 acres of UFM is within Basins 6, 7, and 8, all of which discharge to the Pacific Ocean via culverts under Paseo del Mar. Basins 6, 7, and 8 contribute approximately 36 acre-ft of stormwater runoff from a 10-year, 24-hour storm. Runoff from the remaining 26 acres of UFM in Basin 10, a 166-acre basin, is collected in a storm sewer system and discharges to the Los Angeles Harbor via a 45-inch-diameter reinforced concrete pipe. The 10-year, 24-hour storm results in approximately 56 acre-ft of runoff from Basin 10.

3.1.3.4 LAND RESOURCES

The UFM site was developed for military use in the past and includes infrastructure and buildings. The open area has been disked and mowed. In the March 1986 biological survey, 15 Astragalus, or milkvetch, plants were found at UFM (see Figure 3-3). Astragalus is a required food plant of the endangered Palos Verdes blue butterfly in its larval stage. In surveys conducted since 1979, no Palos Verdes blue butterflies have been observed at UFM.

Four archaeological sites have been identified at UFM which, although they are severely disturbed, may be eligible for inclusion in the National Register of Historic Places. The Osgood-Farley Bunker is in the National Register of Historic Places. No known paleontological resources exist onsite. Potential exists for significant

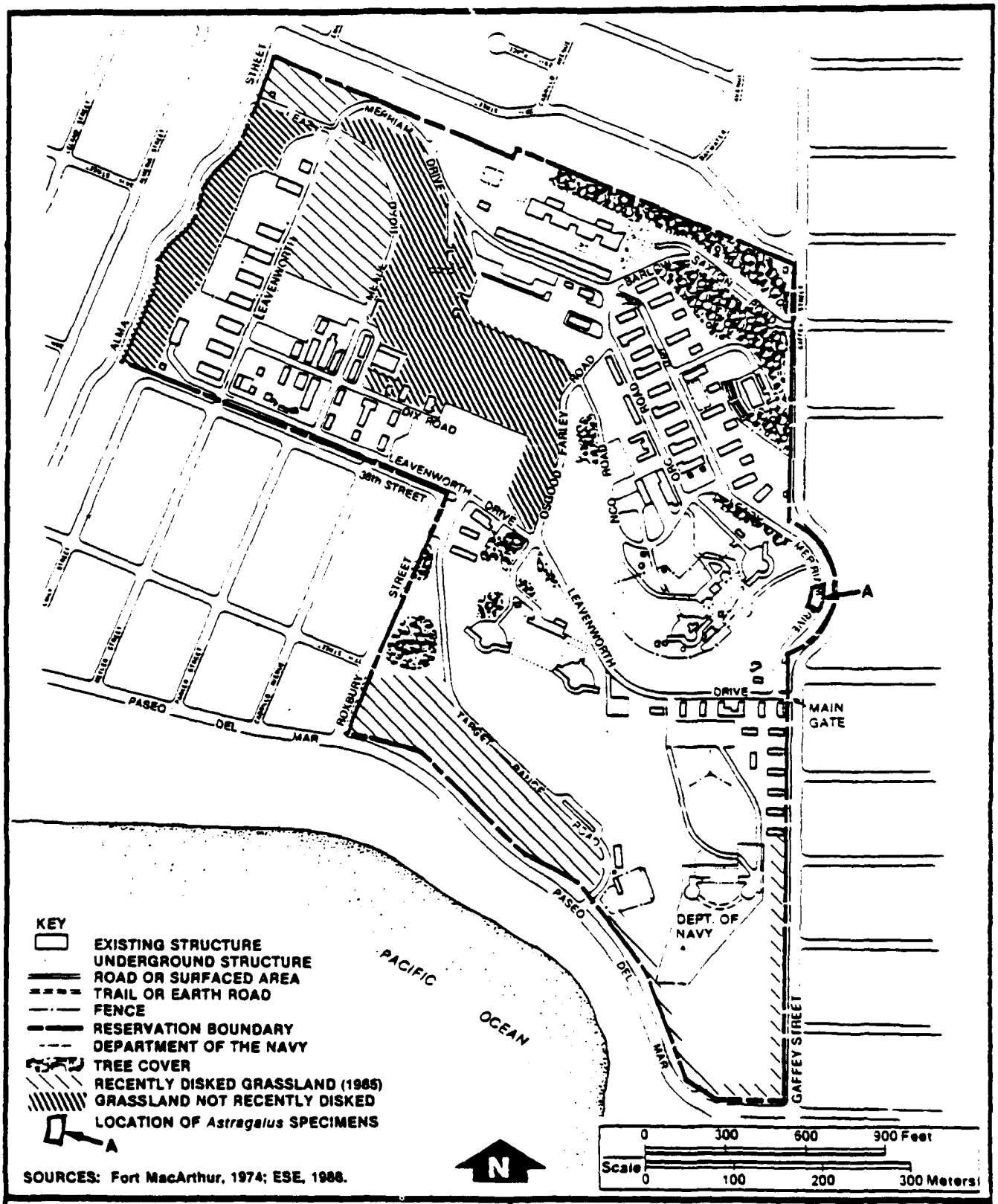


Figure 3-3
UPPER RESERVATION OF FORT MacARTHUR — ECOLOGICAL FEATURES

Coastal Consistency Determination

Air Force Space Division

Housing Project, San Pedro, California

paleontological deposits in the Altamira Shale member of the Monterey Formation which underlies the site covered by a thin soil layer. Several significant finds have been uncovered in that strata in other locations in the region.

3.1.3.5 DEVELOPMENT

The UFM area has qualities related to development similar to WP. The site is surrounded by existing residential development except along approximately one-half of the southern boundary which borders the ocean cliffs. The area possesses no significant hazards to life or property although a small area of poor slope stability exists onsite. The 21-acre parcel designated for potential construction is located on a local topographic high point along a southeasterly trending ridge, and overlooks the Pacific Ocean to the southwest and south, and Los Angeles Harbor to the east.

3.2 COMPLIANCE WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

Those sections of the California Coastal Plan and Policies found to be applicable to the Proposed Action and alternatives are discussed in the following paragraphs and are annotated in Table 3-1 in Section 3.1. Public Access, Recreation, Marine Environment, Land Resources, and Development are discussed within the impacts for each alternative.

3.2.1 PROPOSED ACTION (40 ACRES IN SOUTHEAST AREA OF WP)

3.2.1.1 PUBLIC ACCESS

The Proposed Action on 40 acres along Paseo del Mar would not interfere with the existing public access to the shoreline, nor would it preclude the development of recreational opportunities on the remaining acreage of WP in conjunction with the existing shoreline recreational uses. The remaining 75 acres of WP would be adjacent (i.e., across Paseo del Mar) to the 18-acre Royal Palms State Beach and 31 acres of county land. These three areas could be developed to provide 124 acres of coastal recreational facilities. The Proposed Action would not preclude the

development of lower cost visitor and recreational facilities on the remaining acreage of WP, Royal Palms State Beach, and the county land south of Paseo del Mar.

The influx of 660 military members and their dependents resulting from the Proposed Action represents an increase of approximately 1 percent over the existing population of San Pedro. This increase is not expected to significantly alter the use of the existing beach parks at Royal Palms State Beach and the WP Beach.

3.2.1.2 RECREATION

The physical boundaries of the Proposed Action would not encompass any areas associated with water-oriented recreational activities as the Proposed Action is located on the north side of Paseo del Mar and would not preclude the expansion of these types of uses on the combined acres of Royal Palms State Beach, the county land south of Paseo del Mar, and the remaining portion of WP. The 31 acres of county land currently includes a ball field, which is in poor condition and is not a water-related activity. The Proposed Action would not include any oceanfront land and would not preclude the recreational development of the oceanfront land controlled by the city, county, or state.

The Proposed Action would not be visible from the beach as it would be situated on a flat area above the bluff and separated by Paseo del Mar. Although the housing would be visible from the remaining portions of WP, the housing would be screened by landscaping. In addition, the visual impact would be similar to the impacts from the existing residential area along Paseo del Mar.

3.2.1.3 MARINE ENVIRONMENT

The Proposed Action impacts on the nearshore ocean areas are those normally associated with any construction activity in coastal areas and are expected to be insignificant with the implementation of proper construction methods. The potential impacts include:

1. Increased potential for erosion and sedimentation during the construction period,
2. Increased rainfall runoff volumes and rates due to paved streets and other impervious surfaces, and
3. Washoff of pollutants from driveways and streets.

Estimates of the change in onsite runoff volumes were made for the 24-hour duration, 10-year storm having a rainfall depth of 5.5 inches (13). The Soil Conservation Service (SCS) Runoff Curve Number method (12) was used to estimate pre- and post-development runoff for the Proposed Action and for each alternative. An SCS soil survey covering the vicinity of the three sites has been conducted (11). SCS soil surveys classify soils into one of four hydrologic soil groups, A through D, with A soils being lowest runoff and D being highest runoff soils. The soils at the site are of the Altamont-Diablo association and fall into hydrologic Soil Group D.

The runoff estimates in Table 3-3 assume that no onsite storm water retention is incorporated into the site design. After the housing layout is designed and actual runoff is determined, appropriate stormwater design features will be included within the project.

During construction, the surficial soils will be disturbed and stripped of vegetation by grading and other construction activities. In that condition, the soil is more susceptible to erosion by rainfall. Soils in the area contain some clays which, due to the very small particle size, are more easily carried by the surface runoff than soils with larger grain size, such as sands. Because detailed information regarding site layout and construction planning are important factors influencing erosion and are not available at this time, it is not possible to predict how much erosion and sediment transport might occur at each site for a given rainfall event. Standard erosion control measures (such as silt screens, sediment traps, soil binders and tacks, mulches, etc.) will be used during construction.

Table 3-3. Runoff Volumes (acre-ft) for Proposed Action and Alternatives Without Mitigation for 10-Year, 24-Hour Storm

Basin	Existing Condition Runoff	Estimated Increases Without Mitigation (Total Runoff with Increase Added)								
		Proposed Action	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F	Alt G	Alt H
1	117.10	0	0	0	0	0	0	0	0	0
2	40.90	0	0	0	0	0	0	0	0	0
3	54.90	0	0	0	0	0	0	0	0	0
4	67.10	1.36 (68.43)	1.08 (68.18)	0.82 (67.92)	0.69 (67.79)	0.54 (67.64)	0.82 (67.92)	0.69 (67.79)	0.54 (67.64)	0
5	58.70	0	0	0	0	0	0	0	0	0
6	21.00	0	0	0	0	0	0.05 (21.05)	0.05 (21.05)	0.05 (21.05)	0.05 (21.05)
7	7.00	0	0	0	0	0	0	0	0	0
8	8.00	0	0	0	0	0	0	0	0	0
9	17.50	0	0	0	0	0	0	0	0	0
10	55.90	0	0	0	0	0	0.13 (56.03)	0.13 (56.03)	0.13 (56.03)	0.13 (56.03)
11	36.40	0	0	0	0	0	0	0	0	0
12	472.70	0	0	0.56 (473.26)	0.56 (473.26)	0.56 (473.26)	0	0	0	0.56 (473.26)
Total	975.20									

See Section 3.2.1.3, Figure 4-1 for basin locations

Source: ESE, 1986.

Water quality impacts of completed residential developments include the washoff of pollutants which accumulate primarily on the impervious surfaces. Some pollutants are natural materials which occur at the project site under existing conditions, and other pollutants (e.g., lead, nutrients, etc.) result from development. Available information from other drainage basins (10) was used to estimate the loading rates for the existing natural or urban open area and for residental areas. Pollutant concentration data from that report for 10 priority pollutants are given in Table 3-4. Data for the nationwide median (28-station sample) are given along with the closest geographic station to the study area (i.e., Coyote Creek, San Francisco). The U.S. Environmental Protection Agency (EPA) report notes that site-specific characteristics are more significant than geographical location. The nationwide data are used, therefore, in estimating impacts for the Proposed Action and alternatives.

It is observed from Table 3-4 that a change in land use from urban open or undeveloped to residential results in an increase in pollutant concentration ranging from approximately 1.4 times for nitrite and nitrates to 5.5 times for soluble phosphorus. Total zinc is the only exception for the nationwide sample data with residential concentrations being 0.7 of open area runoff concentrations.

Using runoff coefficients (ratio of annual runoff depth to annual rainfall depth) of 0.05 for urban open and nonurban and 0.30 for residential, average annual rainfall for the area of 12 inches and the concentrations from Table 3-4 results in the loading rates presented in Table 3-5. These data, therefore, reflect what might be expected for the project site and the alternative sites based on the nationwide medians from other locations without any mitigation.

The estimated annual runoff coefficients of 0.05 and 0.30 for open/ undeveloped and residential areas, respectively, indicate that the

Table 3-4. Pollutant Concentrations Without Mitigation

Pollutant	Nationwide (28 Station) Median*		Coyote Creek (San Francisco) Median*	
	Open/ Nonurban	Residential	Open/ Nonurban	Mixed
Total Suspended Solids	70	101	551	171
Biochemical Oxygen Demand	—	10.0	—	--
Chemical Oxygen Demand	40	73	102	80
Total Phosphorus, as P	0.121	0.383	0.455	0.374
Soluble Phosphorus, as P	0.026	0.143	0.091	0.120
Total Kjeldahl Nitrogen, as N	0.965	1.90	3.159	1.775
Nitrite + Nitrate, as N	0.543	0.736	1.383	1.044
Total Copper	--	0.033	0.055	0.065
Total Lead	0.030	0.144	0.159	0.351
Total Zinc	0.195	0.135	0.160	0.231

*Medians of Event Mean Concentrations, in milligrams per liter (mg/L).

Source: EPA, 1983.

Table 3-5. Pollutant Loading Rates* Without Mitigation

Parameter	Nationwide (28 Station) Median		Coyote Creek (San Francisco) Median	
	Open Nonurban	Residential	Open Nonurban	Mixed
Total Suspended Solids (TSS)	9.5	82	75	139
Biochemical Oxygen Demand (BOD)	—	8.2	—	--
Chemical Oxygen Demand (COD)	5.5	59	14	65
Total Phosphorus (as P)	0.016	0.31	0.06	0.30
Soluble Phosphorus (as P)	0.0035	0.12	0.01	0.10
Total Kjeldahl Nitrogen (as N)	0.13	1.5	0.43	1.4
Nitrite + Nitrate (as N)	0.074	0.60	0.18	0.85
Total Copper	—	0.03	0.007	0.05
Total Lead	0.0041	0.12	0.02	0.29
Total Zinc	0.027	0.11	0.02	0.19

*Rates are presented in pounds per acre per year (lb/acre/year) and are calculated based on nationwide median concentrations and 12 inches of rainfall for Southern California area.

--Not available.

Sources: EPA, 1983; ESE, 1986.

total annual runoff volume for the developed condition is 6 times that for undeveloped conditions. This is for annual runoff which is generated primarily by small storm events less than the 10-year storm event presented in Table 3-3. The relative impact for the small storm events is greater than for high rainfall events. The loading rate given in Table 3-5 reflects the increase in total runoff volume in addition to the increase in concentration. Loading rates for residential areas are estimated to be approximately 8 times larger for nitrite and nitrate nitrogen and 34 times larger for soluble phosphorus when compared with the open area. This is due to runoff of fertilizers that are usually applied to lawns in residential areas

The loading increases described above apply to the actual area being developed. The relative increase at the storm water outfall from the entire drainage basin depends on the existing land use in the drainage basin and the size of the basin. For example, Basin 4 (the basin impacted by the Proposed Action) currently includes 115 acres of undeveloped land and 96 acres of residential land use. Using the loading rates from Table 3-5 for soluble phosphorus, the pollutant with the greatest rate increase, it is found that the Proposed Action would increase the annual load from 11.6 pounds (lb) to 16.1 lb, a 39 percent increase.

Since kelp beds appear to be uniform along the coastline adjacent to WP, and kelp beds are sensitive to TSS concentrations, the loading rates for the existing basins were compared to the projected outfall loads for the Proposed Action and each alternative for the assessment of impacts on the marine environment. The relative increases in loading for the other pollutants given in Table 3-4 are similar to the increases for TSS. For example, the increase in TSS for the Proposed Action for Basin 4 is approximately 32 percent which is representative of percent increases at that outfall for other pollutants resulting from the Proposed Action (with no mitigative measures considered).

The stormwater analysis indicates that significant marine environment impacts would not be expected for the Proposed Action. The existing condition pollutant loading rates for the outfall from the drainage basin which includes the Proposed Action site may be increased by approximately 30 to 40 percent. With the increase, the loading at that outfall would still be less than estimated for three adjacent outfalls which have no known documented problems due to local stormwater runoff. The Proposed Action would increase the total local stormwater pollutant load to the Pacific Ocean by approximately 4.5 percent. These loads are insignificant compared to the assimilative capacity of the marine areas and the volume of water involved with tidal exchanges. In addition, total stormwater loadings from the entire 12-basin drainage area of southern San Pedro are less than 1 percent of the offshore municipal discharge described in Section 3.1.1.3). Because these loading impacts are not expected to be significant, stormwater detention is not required in the stormwater management plan for the Proposed Action.

3.2.1.4 LAND RESOURCES

The severely modified habitat as a result of disking for fire control by the City of Los Angeles on WP does not offer environmentally sensitive habitat on the Proposed Action. Of particular significance is the information that no individuals of Astragalus trichopodus var. lonchus (milkvetch), the food source of the endangered Palos Verdes blue butterfly (Glaucopsyche lygdamus palosverdesensis), were found on the proposed 40 acres (see Figure 3-2). The Proposed Action, therefore, would not impact the endangered butterfly.

Development of the Proposed Action would not impact the habitat of the remaining portion of WP and would not be incompatible with continuance of adjacent habitat areas as the project would not result in the disturbance of surrounding areas. Of greater concern to the existing habitat is the continuation of the disking of the remaining portion of WP for fire protection.

The Proposed Action would impact several historic, archaeological, and paleontological resources. Of particular importance, the Proposed Action would impact the entire NIKE facilities. The NIKE Launchers are probably eligible for inclusion in the National Register of Historic Places because of their historical significance as part of 11 NIKE air defense sites that formed a ring around the greater Los Angeles area. In addition, the NIKE facilities, with the Coastal Batteries on WP, represent a unique combination of coastal defense systems from WWII and the 1950s and 1960s. Therefore, the combination of these two sites is probably eligible for inclusion in the National Register of Historic Places.

The Proposed Action would also impact the entire areas of two archaeological sites which are both probably eligible for inclusion in the National Register of Historic Places. The National Historic Preservation Act of 1966 and its implementing regulations require a determination as to whether or not the historical and archaeological site(s) are eligible for inclusion in the National Register of Historic Places. If a site is found to be eligible for inclusion on the National Register, a determination is required to identify the level of impact to the site from the Proposed Action. If the impact is determined to be adverse, a memorandum of agreement (MOA) will be developed with the State Office of Historic Preservation, the Advisory Council on Historic Preservation, and the USAF to establish a plan to mitigate the adverse effects. A qualified archaeologist will monitor all surface cutting activities at the Proposed Action or alternative sites, and any artifacts will be curated at appropriate museums. The paleontological survey has indicated the potential for paleontological resources to be discovered at the Proposed Action location. A qualified paleontologist will be onsite to monitor construction activities involving earth movement or excavation.

3.2.1.5 DEVELOPMENT

A determination of the actual visual impact of the Proposed Action cannot be made until the final site plan has been developed and building elevations completed. However, by means of a visual survey of the project site and surrounding neighborhoods, it appears that ocean vistas from surrounding neighborhoods will not be significantly affected with the exception of homes located south of 37th St. and east of Weymouth Ave. Units located on the extreme southern portion of the site may slightly alter the view of the ocean from homes located west of Western Ave. The actual degree of impact would depend on the height of the units and the setback from Paseo del Mar. Because of the high, steep ocean cliffs, the Proposed Action would not impact views from the beach or immediately offshore. Further out into the ocean the site would become visible above the cliff tops. The view would be compatible with the surrounding areas of houses.

The project site is located on a relatively level area situated between two bluffs. This location services two functions: (1) to prevent the obstruction of view from the northernmost bluff, and (2) to minimize the alteration of existing landforms.

The Proposed Action would be visually consistent with the surrounding single-family residential neighborhoods. The development would be similar in nature to adjacent neighborhoods regarding characteristics such as scale, building height, and density.

The Proposed Action is, in general, not located in an area subject to natural hazards to any greater extent than the majority of the surrounding region. Results of geotechnical investigation indicated the site is buildable for the proposed houses.

3.2.2 ALTERNATIVE A (50 ACRES IN NORTHWEST AREA OF WP)

3.2.2.1 PUBLIC ACCESS

Alternative A, which provides for 50 acres along the northwest boundary of WP, would leave an area for public use of 65 acres. The public

access to this 65 acres is the same as the discussion for the Proposed Action. If the remaining area from this alternative were combined with the Royal Palms State Beach and county land, the three areas could be developed into 114 acres of recreation facilities.

3.2.2.2 RECREATION

The impacts of Alternative A would be similar to those discussed for the Proposed Action (see Section 3.2.1.2) except for the visual impact on upland coastal terraces associated with this alternative. The use of these uplands would reduce the areas available for ocean viewing.

3.2.2.3 MARINE ENVIRONMENT

The impacts on the marine environment would be similar to those discussed for the Proposed Action (see Section 3.2.1.3).

3.2.2.4 LAND RESOURCES

Land area projected for development under Alternative A includes terrain of greater slope and the area where the Astragulas occurs and has the greatest potential for reestablishment. A survey of the site in March 1986 indicated that only one Astragulas plant exists on the site and the condition of the plant was poor. Therefore, this is not considered a significant source of food for the Palos Verdes blue butterfly.

Land area involved in this alternative also has larger areas of natural vegetation than the Proposed Action or other alternatives.

This alternative would impact major portions of the three archaeological sites and the Sepulveda home site, which are probably eligible for inclusion in the National Register of Historic Places. The procedures for determining the significance of each site and mitigative measures, if necessary, are described in Section 3.2.1.4.

3.2.2.5 DEVELOPMENT

Because of the bluff located on the western portion of the site, impacts on nearby homes west of the site should be minimal. Development on the

ridge would be visible from the ocean and portions of the beach. The view would, however, be compatible with the surrounding area.

The proposed project is not located in an area subject to natural hazards to any greater extent than the majority of the surrounding region.

3.2.3 ALTERNATIVE B (16 ACRES IN NORTH WP AND 22 ACRES AT BP)

BP is not located within the California Coastal Zone, so no discussion of BP is required other than stormwater runoff impacts on the marine environment. The following sections discuss only the WP areas associated with this alternative.

3.2.3.1 PUBLIC ACCESS

Alternative B would require 16 acres in the north portion of WP, which would leave an area of 99 acres for public use on WP. The public access to this 99 acres would be the same as discussed for the Proposed Action. If the remaining area at WP were combined with the Royal Palms State Beach and county land, the three areas could be developed into 148 acres of recreation facilities.

3.2.3.2 RECREATION

The impacts of Alternative B would be similar to those discussed for the Proposed Action (see Section 3.2.1.2) except for visual impact on the uppermost terrace on the site.

3.2.3.3 MARINE ENVIRONMENT

The impacts on the marine environment would be similar to those discussed for the Proposed Action (see Section 3.2.1.3) except loadings would be decreased in proportion to the smaller area of development. The pollutant loading at the outfall from the system which drains the WP site would increase 13 percent. The loading increase to the Los Angeles Harbor from the BP site is only 1.5 percent. Impacts from each of these are expected to be insignificant.

3.2.3.4 LAND RESOURCES

This alternative would not impact the two Astragulus plants found on the site, nor would it impact the high slope areas where the plants have the greatest potential to reestablish. The site includes the northern portion of one archaeological site which is probably eligible for inclusion in the National Register of Historic Places. The procedure for determining the significance of the site and mitigative measures, if necessary, are described in Section 3.2.1.4.

3.2.3.5 DEVELOPMENT

Because this alernative is located on the uppermost terrace, it would have minimal impacts on views of surrounding areas. It is not possible from most existing houses to see this terrace because of the high bluff located on the western edge of the WP area. Views of the WP site would not be possible from the beach. Views from the ocean would be possible from a distance offshore and would be compatible with the surrounding area.

3.2.4 ALTERNATIVE C (16 ACRES IN SOUTH WP AND 22 ACRES AT BP)

Since BP is not located in the California Coastal Zone, the following sections discuss only the WP area associated with this alternative. Discussion of stormwater impacts on the marine environment are included for Alternative B, Section 3.2.3.3.

3.2.4.1 PUBLIC ACCESS

The impacts from this alternative would be similar to the Proposed Action (see Section 3.2.1.1). Since this alternative requires only 16 acres, the remaining area for public use would be 99 acres. The combined area of the remaining WP area, the Royal Palms State Beach, and county land would be 148 acres available for development into recreation facilities.

3.2.4.2 RECREATION, MARINE ENVIRONMENT, AND DEVELOPMENT

The impacts of this alternative would be similar to those discussed for the Proposed Action.

3.2.4.3 LAND RESOURCES

The impact to the existing habitat would be similar to those discussed for the Proposed Action. This alternative would impact about half of the NIKE facilities and most of the archaeological site Eberhart-9. Both of these sites are probably eligible for inclusion in the National Register of Historic Places.

3.2.5 ALTERNATIVE D (9 ACRES IN SOUTH WP AND 22 ACRES AT BP)

Since BP is not located in the California Coastal Zone, the following sections discuss only the WP area associated with this alternative.

3.2.5.1 PUBLIC ACCESS

The impacts from this alternative would be less than the Proposed Action (see Section 3.2.1.1). Since this alternative requires only 9 acres, the remaining WP area for public use would be 136 acres. The combined areas of the remaining WP area, the county land, and the Royal Palms State Beach would be 155 acres available for development into recreation facilities.

3.2.5.2 RECREATION, MARINE ENVIRONMENT, AND DEVELOPMENT

The impacts of this alternative would be similar to those discussed for the Proposed Action.

3.2.5.3 LAND RESOURCES

The impacts to the existing habitat would be similar to those discussed for the Proposed Action. This alternative would impact a portion of the archaeological site Eberhart-9. This site is probably eligible for inclusion on the National Register of Historic Places.

3.2.6 ALTERNATIVE E (16 ACRES IN NORTH WP AND 21 ACRES AT UFM)

The impacts to WP would be the same as those discussed for Alternative B.

The impacts to UFM, which is within the coastal zone, are discussed below for each of the applicable articles of the California Coastal Act.

3.2.6.1 PUBLIC ACCESS

The UFM area lies on the uplands above the beach and ocean cliffs. Paseo del Mar lies between the southern boundary of the UFM area and the ocean cliffs. The cliffs along the UFM area are approximately 125 ft high and very steep which prevents direct access to the beach at this point.

The UFM area is currently used for various recreational and cultural activies, but these do not include camping. None of the activities are coastal dependent other than the ocean vistas from the Korean Bell site. The City Department of Parks and Recreation has plans for developing the area owned by the department as a city park which also would not include camping sites. The 21-acre UFM site included in this alternative would, therefore, not impact low-cost recreational access to the beach. The impacts of the UFM site on beach usage are the same as those discussed for the Proposed Action (see Section 3.2.1.1).

3.2.6.2 RECREATION

The City Department of Parks and Recreation owns the 64-acre portion of UFM on which the 21-acre site for this alternative is located. The city's plans for development of the parcel have not progressed because of lack of funds. This alternative would reduce the area available for recreational development from 64 acres to 43 acres. Because camping is not included in the city's plans, the loss of area is not expected to be a significant impact on the capacity of the remaining 43 acres to provide upland recreational support area in the coastal zone, including cultural sites, hiking, and ocean views.

3.2.6.3 MARINE ENVIRONMENT

The offshore areas of the Pacific Ocean along the UFM area would receive additional pollutant loading from storm runoff from approximately one-third of the 21-acre site. The remainder of the area would drain to the Los Angeles Harbor. The additional loading to each of these receiving water bodies would be small in comparison to existing loads, and impacts would be insignificant. Erosion and sediment loading potential is increased temporarily during construction. Standard construction erosion and sediment control measures would be used to minimize potential impacts.

3.2.6.4 LAND RESOURCES

This alternative would not impact the 15 Astragalus plants found on the UFM site. At the UFM site there is one archaeological site that may be eligible for National Register of Historic Places inclusion, which might be adversely impacted by construction on the 21-acre site for this alternative. The Altamira Shale stratum which underlies the area may have significant paleontological deposits which could be uncovered by grading or excavation. Impacts of such an unearthing would be minimized by having a paleontologist onsite during these construction activities.

3.2.6.5 DEVELOPMENT

Because the 21-acre UFM site lies on a local topographic high point along a ridge, the construction of detached, single-family residences would not obstruct the view to the ocean of any existing residences or recreational areas. The 21-acre site contains several old military buildings which would need to be demolished for this alternative. Although the residential development would be visible from a point well offshore looking landward, the replacement of the existing buildings with residential structures is not considered to be an adverse impact.

3.2.7 ALTERNATIVE F (16 ACRES IN SOUTH WP AND 21 ACRES AT UFM)

The impacts to WP would be the same as those discussed for Alternative C.

The impacts to UFM are the same as those discussed for Alternative E.

3.2.8 ALTERNATIVE G (9 ACRES IN SOUTH WP AND 21 ACRES AT UFM)

The impact to WP would be the same as those discussed for Alternative D.

The impacts to UFM are the same as those discussed for Alternative E.

3.2.9 ALTERNATIVE H (22 ACRES AT BP AND 21 ACRES AT UFM)

Since BP is not located within the California Coastal Zone, no further discussion is required. The impacts to UFM from this alternative are the same as those discussed for Alternative E. There would be no impact to the WP site.

4.0 LIST OF ABBREVIATIONS

Army	U.S. Army
AYSO	Americal Youth Soccer Organization
BP	Bogdanovich Park
CCC	California Coastal Commission
CCMP	California Coastal Management Plan
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DOD	Department of Defense
DOI	U.S. Department of Interior
du/acre	dwelling unit per acre
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ft	foot
ft^2	square foot
FWS	U.S. Fish and Wildlife Service
GSA	General Services Administration
HEW	Department of Health, Education, and Welfare
JWPCP	Joint Water Pollution Control Plant
LAAFS	Los Angeles Air Force Station
LACSD	Los Angeles County Sanitation District
lb	pound
lb/acre/year	pounds per acre per year
MFM	Middle Reservation of Fort MacArthur
MGD	million gallons per day
mg/L	milligrams per liter

MOA	memorandum of agreement
NOAA	National Oceanic Atmospheric Administration
SCS	Soil Conservation Service
SD	Space Division
ton/yr	tons per year
TSS	total suspended solids
UFM	Upper Reservation of Fort MacArthur
USAF	U.S. Air Force
WP	White Point
WWI	World War I
WWII	World War II

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APPENDIX 1

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SPACE DIVISION (AFSC)
LOS ANGELES AIR FORCE STATION PO BOX 92960 WORLDWAY POSTAL CENTER
LOS ANGELES CA 90009

Honorable Tom Bradley
Mayor of Los Angeles
Los Angeles, CA 90012

18 APR 1983

Dear Mayor Bradley

It has come to my attention that the City of Los Angeles and the Navy are currently in the process of negotiating land interests in the San Pedro area for the construction of family housing for Navy personnel.

As you know, housing for Air Force personnel has been one of my top priorities for several years. We have made some progress with the recent completion of 200 units on the Middle Reservation of Fort MacArthur. We have another 200 units approved and funded in this year's budget and another 140 units programmed in the FY-85 budget.

Your citizens advisory committee reviewed the available sites in the San Pedro area and made certain recommendations concerning each parcel in their final report last spring. Among those recommendations were that the Middle Reservation be limited to 369 new townhomes and that a portion of the former 43L Nike site (White Point) be used for military housing.

We would like to explore the possibility of the White Point site with your administration. If we are to accommodate the recommendation concerning the Middle Reservation, we have an immediate requirement for approximately 30 units in our current budget plus the 140 units in the FY-85 budget. We believe a satisfactory arrangement can be worked out and would like to see that effort initiated. My point of contact is Colonel John D. Pearman, Director of Civil Engineering (Telephone: 643-0920).

I would also like to extend my personal invitation to have you visit our recently completed housing project. We believe it is a fine addition to the San Pedro community and one that reflects the spirit of cooperativeness and the positive contribution that the military makes to the local community.

Sincerely

Richard C. Henry

RICHARD C. HENRY
Lt General, USAF
Commander

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SPACE DIVISION (AFSC)
LOS ANGELES AIR FORCE STATION P.O. BOX 92960 WORLDWAY POSTAL CENTER
LOS ANGELES CA 90009

16 APR 1983

Ms Joan Milke Flores
Councilwoman
City of Los Angeles
Los Angeles, CA 90012

Dear Councilwoman Flores

I have taken the initiative to open discussions with the City of Los Angeles relative to additional land for housing for our Air Force personnel. The attached letter to Mayor Bradley is intended to initiate that dialogue.

I would appreciate the opportunity to discuss that effort with you and solicit your support in that regard. We believe that our efforts to date have been a positive influence in the community and that we will continue to make positive contributions in the future. Again, I extend my personal invitation to you to tour the recently completed housing at your convenience.

Arrangements for such discussions and tour can be made by having your staff contact my Executive Officer, Major Shattuck at 643-1653.

Sincerely

SIGNED

RICHARD C. HENRY
Lt General, USAF
Commander

1 Atch
Letter to Mayor Bradley

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

June 28, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Dear Ms. Flores:

I appreciate the opportunity to meet with you concerning Air Force housing requirements at White Point. Your support of military family housing needs is reassuring. The business-like atmosphere of our discussion indicates to me that we can resolve this matter without an extended controversy or litigation.

During the meeting, you suggested that we consider the use of the former Upper Reservation of Fort MacArthur in combination with 12.5 acres of the Bogdonovich Park property (former Portsmouth Navy housing site) as an alternative to siting our housing on White Point. After careful consideration, we have regretfully reached the conclusion that the Upper Reservation is not a workable solution. However, this has led us to another alternative which you may find attractive, but first let me spell out our reasons for not concurring with the use of the Upper Reservation.

The houses will cost more to build due to the different site conditions, especially the removal of many existing buildings. In addition to the direct costs, the delays for additional engineering work, demolition, pavement removal, site preparation, and a new environmental analysis process will drive the cost up further. This delay cost includes both a higher overall project cost due to inflation during the delay and payment of housing allowances for a longer period of time (see below).

b. There would be a long delay to study the Upper Reservation area and prepare an environmental assessment for two separate areas. This portion of the delay alone translates into approximately $1,600,000 annual additional cost for housing allowances. There is a further serious but unquantifiable loss

in productivity from lessened morale and reduced retention in the service of highly educated military personnel forced into one of our nation's highest shelter-cost markets. Our compromise proposal also has environmental implications, but we feel that they are similar to those already considered and found to have no significant impact. Therefore, we expect to discuss them in an amendment to our existing environmental assessment.

c. We remain concerned that there would be a severe adverse local community reaction. The Upper Reservation is used by a number of different community groups. It was primarily for this reason that the 1982 Mayor's report eliminated this area, and why we elected not to disagree with the recommendation. I recognize that the relocation of these activities is a decision and responsibility of the city, but we are still concerned. Moreover, the Upper Reservation is sufficiently distant from White Point that a different part of the San Pedro community resides in the vicinity. We believe we have met the South Shore Homeowners' concerns in the portions of the letter that follow; we do not wish to re-initiate the community dialogue process with a new neighborhood.

We remain convinced that a single, contiguous area at White Point would be the most advantageous site to meet our critical housing needs. As discussed at our meeting, there are many siting alternatives which could be explored in conjunction with a park in order to achieve the most mutually advantageous plan for development of this property. However, in a spirit of cooperation and joint planning with the City of Los Angeles and the San Pedro community, we would be willing to explore a split housing development between a reduced area on White Point and the Bogdonovich Park site. After a preliminary examination, the Bogdonovich Park site, in which the federal government also has a reversionary interest, seems feasible for locating some of our housing.

By using the Bogdonovich site, there seem to be at least two siting opportunities on White Point that will be most compatible with use of the balance as a park. The first is a site on the level ground along Paseo del Mar on the east side of the tract, away from the present state beach. Some hillside area might be used, if acceptable to the community and buildable at reasonable cost, to minimize the amount of land required. This area was proposed as the site for a portion of the houses by Mr. Jerry L. Gaines, President of the South Shores Homeowners' Association, in a letter of June 6, 1985. We believe his suggestion has merit and should be investigated.

The second possibility is to use land along 25th Street between Western Avenue and the Navy housing, extending some distance

onto the upper level of the White Point area above the old batteries. This idea would minimize conflicts with both coastal zone values and potential park uses. Its proximity to the Bogdonovich site would be beneficial from a military community point of view, and would simplify maintenance management. Since this immediate area is dominated by the commercial uses centered on the 25th Street and Western Avenue intersection, some higher density type construction would be compatible and would minimize the land requirement. This, however, could be taken up in the joint planning process.

We feel that it is important that our position on building housing at White Point be fully understood. We have a current, pressing need. Congress quite properly expects us to proceed in a timely fashion to construct the projects they have authorized. Due to the controversy over payment for this site, they have taken a special interest in assuring that it is used without undue delay. Accordingly, we must begin planning and design work on alternative sites and design concepts. To evaluate the feasibility of the alternative sites encompassed by this proposal, it is imperative that we be granted access to White Point and, if you concur with our alternative, Bogdonovich Park, no later than mid-July. This will enable us to accomplish preliminary topographical and soils work. From it we would develop alternate proposals from which a final site plan for the housing will be chosen. Hopefully, this site selection would be part of the joint planning process. The survey and study results would also be available for more detailed planning of a park.

The Air Force would like to begin the joint planning process that we have proposed at once. To establish a date for the next meeting, please contact Lieutenant General McCartney, Colonel Rodgers or me.

We appreciate the opportunity to work with you and the City of Los Angeles on this matter. Through a spirit of cooperation the local community, the City of Los Angeles and the Air Force will all benefit. We in the Air Force are looking forward to working with you in a joint planning process.

Sincerely,

JAMES F. BOATRIGHT
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330 -1000

OFFICE OF THE ASSISTANT SECRETARY

August 22, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Dear Ms. Flores:

This letter is with respect to use of White Point for military family housing, which we have discussed on a number of occasions. I promised to send you a letter confirming my position during our discussion August 9. This letter was delayed because I was out of town.

First, I will briefly review our requirement for housing and summarize what has happened to date. Then I will confirm the Air Force position on the use of Bogdanovich Park (±22 acres) for siting our housing as you have suggested.

The Air Force has a serious problem in providing housing for people stationed at Space Division, Los Angeles Air Force Station. This is not just a parochial Air Force concern. The Secretary of Defense personally determined that new housing was necessary, and so did the Director of the Office of Management and Budget. The Congress has provided funds for 170 units of housing, to be built specifically on land at White Point. While there may be disagreement locally about whether the government should provide housing for military families at Space Division, it has been firmly resolved on the national level.

White Point was originally bought by the government with taxpayer funds before World War II. It was donated to the city in 1978 for park purposes, but the government provided in the deed that it could secure return of the property if needed for national defense. The city has made no use of the land for park purposes in the intervening seven years. This, we are told, is due to funding priorities. Now the state has expressed an interest in establishing a state park on the land. The state, however, has yet to do much planning, and there are clear local divisions over the state's insistence on providing for overnight camping. Park use, therefore, appears to remain somewhat in question.

In 1982, a committee appointed by Mayor Bradley recommended constructing this housing on the west side of White Point, along Western Avenue. We accepted this decision by the city, and so did the Congress. We made extensive efforts to work with the surrounding community to make the project compatible with nearby homes. To meet their desires, we secured approval from the Office of the Secretary of Defense to build detached homes with enclosed garages, contrary to normal policy that calls for semidetached units and carports for most military family housing.

Now let me confirm the Air Force position on the use of Bogdanovich Park. As I told you in our August 9, 1985, telephone conversation, the Air Force is willing to pursue Bogdanovich as our primary site. The only question outstanding is how many housing units could be accommodated on the site in a density and configuration acceptable to the Air Force and compatible with the surrounding community. If we could not get all of our housing units on Bogdanovich, then the Air Force is willing to look first at the Navy land to accommodate the remaining housing units, provided the land proves to be suitable for this purpose and that you can make the land available as promised. To the extent that additional land would be required to site our housing units, we would use a portion of White Point. I have pledged to you that the Air Force will make a concerted effort to site all of our housing units without using White Point land and, if this is not possible, we will use as little land on White Point as we can reasonably get by with. In addition, I have pledged that any use of White Point land would be done in a way that would fully consider future park development and thus minimize any adverse impact.

The position on the use of Bogdanovich Park for siting our housing was conditioned on the city granting immediate access to both Bogdanovich Park and White Point for site investigative surveys and tests. We need this detailed information to develop specific siting and housing configuration alternatives. It is impossible to make intelligent decisions on the use of the property in question without this essential information and preliminary planning. This information would allow all reasonable alternatives to be evaluated in a joint planning effort and I am confident it would result in a mutually acceptable solution. Frankly, I am puzzled at the city's continued refusal to allow access to the White Point property for this very limited but necessary purpose. It is particularly frustrating because your proposal that we use Bogdanovich puts us so very close to an acceptable solution. It does not, however, effect the need to survey White Point. As I have expressed several times, the Air Force is not willing to spend several months studying the areas outside

of White Point, only to find that the need for some White Point land remains. That would cause another prolonged and unacceptable delay to repeat the study process and would not permit a comprehensive review of all of the reasonable alternatives. We simply must study all of the alternatives together if we are going to reach the best possible solution for all of the parties concerned. Therefore, in return for my firm agreement on the above position, and my further commitment not to seek reversion until we had done our siting studies and gone over them with the city and state, I asked again for immediate access for surveys. Once again, you refused.

I have understood your concern about granting access for surveys to be that the public would perceive that the city was capitulating. Written assurances from us that this was not so were not acceptable to you. To relieve you and other city officials of any responsibility, we filed an action in Federal court condemning right to enter White Point for tests and surveys f 170 days. This should have solved your perception prob m, in that the Air Force took sole responsibility. The City Attorney, however, appeared and sought to delay access, for reasons not evident to us other than for the sake of delay, and was unfortunately successful in obtaining a 30-day delay.

Ms. Flores, the Air Force was very excited about your proposal that we use all of Bogdanovich Park, as we thought this put us very close to an acceptable solution. The Air Force has enjoyed a long and fruitful relationship with the City of Los Angeles. It is hardly the city's fault that housing costs are so high, but we are obliged to do what we can to mitigate them for the people we order to work at Los Angeles Air Force Station. Due to the sensitive and important nature of the work at LAAFS, we must have the best officers available. At present, the cost of housing makes this an undesirable assignment, resisted by many of the people we need the most. You have acknowledged during our discussions your full support for providing adequate housing for our military members. We have searched for sites for over six years. The White Point area of San Pedro is not ideal, but it is the only workable one available to us. Time is running out on site selection and we simply must make a selection and move to the design and construction of houses.

In summary, the Air Force is firmly committed to using Bogdanovich Park to reduce or eliminate the need for White Point land, but we must have survey access at once. I feel that the Air Force has come a tremendous distance from its original position in order to accommodate the city and your concerns. We are sincerely willing to engage in a joint

planning effort to achieve a mutually acceptable solution provided it can be done in a reasonable time. Given this posture, I conceive of no rational reason why a survey of White Point, without any pre-commitment by us to using all or part of it, should be objectionable. I, once again, request that the city withdraw its opposition to our declaration of taking for a four-month survey easement, thereby allowing us to proceed with surveys under that easement and a cooperative joint planning process.

As I stated in our last telephone conversation, if this is not acceptable, then the Air Force because of time constraints will have no choice but to pursue reversion of the White Point property and get the design and construction of our housing units under way at the earliest possible date. I appreciate your efforts to date and I remain hopeful that somehow we can achieve a mutually acceptable solution.

Sincerely,

JAMES F. BOATRIGHT
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

City Council of the City of Los Angeles

OFFICE OF THE PRESIDENT PRO TEMPORE

Joan Milke Flores
COUNCILWOMAN, 15TH DISTRICT

485-3347

September 4, 1985

Mr. James F. Boatright
Deputy Assistant Secretary of the Air Force
Department of the Air Force
Washington,D.C. 20330-1000

Dear Mr. Boatright:

Thank you for your letter regarding the important issue of military housing and recreational land in San Pedro.

We would reiterate that San Pedro continues to be very supportive of military housing. We are proud to say that we have many military housing complexes in our community.

As you know, we have in fact offered the Air Force several parcels of property in San Pedro which could accommodate your housing needs. We would like to meet your needs while also preserving the single largest undeveloped piece of coastal property in the City of Los Angeles -- White Point.

With that in mind, we would offer you the following proposal:

1) Use of the entire Bogdanovich Park parcel for military housing, relocation of existing sports facilities and preservation of views for the condominium complex in the far northwestern portion of the property. Permission has been granted by the City for the Air Force to survey this entire property.

2) Access to eastern portion of White Point to survey a 20-acre area for future development, if needed, of 10 acres or less.

Final approval for any development at White Point will be contingent upon the City receiving clear title to remaining White Point property.

If and when a final agreement is reached as outlined above, I will request the City Council to rescind its objection to Coastal Commission approval for development of the property to be used for Air Force housing.

HARBOR CITY / STRIP
SAN PEDRO
WATTS
1913 E. 103RD STREET
WILMINGTON
415 NEPTUNE AVENUE

We believe that this proposal, which enjoys widespread community and city support, will provide your needed housing in a desirable environment as well as preserving most of White Point for recreational development.

Yours very truly,

Joan Mike Flores

JOAN MIKE FLORES
President Pro Tempore
Los Angeles City Council

JMF:mk

DEPARTMENT OF THE AIR FORCE
WASHINGTON 20330

OFFICE OF THE ASSISTANT SECRETARY

September 6, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Dear Ms. Flores:

Thank you for your letter of September 4, 1985, on military housing and recreational land in San Pedro. Your proposal that we survey all of Bogdanovich Park and 20 acres in the eastern portion of White Point is accepted.

For our mutual understanding, here is what we have agreed on.

1. Access for surveys is granted to all of Bogdanovich Park and 20 acres of the eastern portion of White Point.

2. The Air Force will intensively study these areas and develop alternate site layouts for discussion with the City.

3. The Air Force will prepare site layouts and alternatives on: (a) Bogdanovich Park, less a portion of the northwestern part to preserve views for the adjacent condominium complex; and (b) up to 10 acres of a 20 acre tract on the eastern part of White Point as may be required.

I have some observations, which I have made to you before in our conversations. First, we will make every good faith effort to site our 170 houses on Bogdanovich Park. It makes economic sense for us to operate one project instead of two. If, however, they cannot be sited there, or on a combination of Bogdanovich and the eastern part of White Point in a manner acceptable to the Air Force, we may have to come back to you to survey more White Point land. You will have full details of our efforts and reasoning at that time, and I would hope that the need for any such request would be self-evident.

Second, I was frankly surprised that you designated the eastern part of the property rather than the land along 25th street. From the little we know of both the State's and the Coastal Commission's reasoning, that would seem to be more acceptable to them. I am not seeking access to that land at this time, but if you find that my impression is correct it might be to everyone's interest for us also to survey 20 acres or so along 25th street and study alternatives involving it. This is a suggestion; not a request. The eastern part of White Point is acceptable from our perspective.

Third, I appreciate your position on relocating the ballfields now at Bogdanovich Park. While we fully understand this position, it does create a very difficult problem for us

since our project does not include funding for this purpose. As we evaluate alternative siting and housing configurations, we will also assess the availability of funding for this purpose and will be prepared to discuss it at a subsequent meeting with the City.

Fourth, as you know, the Air Force has no authority to remove the reversion clause in the present deed to White Point. We recognize that you expect it to be removed with respect to the part of White Point not used for housing. If we are able to site our 170 units of housing in a satisfactory manner and reach agreement on all other conditions, I will support and seek appropriate action to release the reversion on the balance of the White Point property.

I appreciate your efforts in this matter. As you know, the Air Force urgently needs these additional housing units and I am hopeful we can get the project under construction at an early date.

Sincerely,

James F. Boatright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

602

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330

22 Oct 1985

OFFICE OF THE ASSISTANT SECRETARY

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles CA 90012

Dear Ms Flores

In response to the City's proposed siting for additional Air Force family housing in the San Pedro area outlined in your letter of September 4, 1985, the Air Force conducted site engineering investigations and preliminary site planning. The purpose of this letter is to provide you with the results of these efforts and to respond to the City's proposal.

A recent survey of Air Force housing needs in the Los Angeles area has reconfirmed our urgent and immediate need. Therefore, your assurances that you and the community of San Pedro continue to be very supportive of military housing is sincerely appreciated. As you know, the land at White Point is our desired site for the currently approved and funded 170 housing units. The site was carefully selected for the numerous reasons previously discussed with you. We believe White Point to be the best solution for the City, community and Air Force. However, we continue to be very sensitive to the desires of the City of Los Angeles and the citizens in the San Pedro area. Accordingly, your proposal to have us site housing on Bogdanovich Park and, if needed, White Point is an acceptable alternative.

The engineering data has confirmed that both Bogdanovich Park and the southeast corner of White Point are geologically suitable for our planned construction. In order to meet our needs, it will be necessary to develop all of the economically buildable land on Bogdanovich Park, estimated to be about 16.5 acres, together with 20 acres of an eastern White Point site. However, preliminary archeological investigations at Bogdanovich indicate a costly data recovery effort may be required prior to construction. Our layouts of housing are consistent with the surrounding neighborhoods and should in no way negatively impact their value. The 1.5 acre open space to preserve the view from existing condominiums has been maintained. We have incorporated the conditions stated in the San Pedro Chamber of Commerce report in our planning with the exception of their request for a joint use athletic field.

The Air Force understands and appreciates the need to relocate the existing Bogdanovich sports fields. We are willing to contribute to the cost of moving them to another site provided by the City if, after contracting for construction, there are funds remaining in the appropriation for this project. As you know, our original funding request was reduced by the

Congress. The delays in starting construction have eroded the purchasing power of our funds. Building on the two sites further complicates the financial picture. There appears to be a lower cost alternative available. We would omit the Bogdanovich Park soccer field from the project area if compensating land, some five to six acres, were provided on White Point. This would not appear to have any serious impact on state park use of the balance of White Point. While we have to site houses on the baseball field at Bogdanovich park, there are two such fields at White Point already. We would be willing to contribute to their rehabilitation on the same basis as above, that is if there were funds available after contracting for construction. We would expect a reasonable curfew on night use of the soccer field.

Regarding the reversion rights pertaining to White Point, the Air Force will support the City's request for a change in the reversion clause of the deed for the White Point land, to be effective when transfer of the Bogdanovich Park and White Point sites to the Air Force is final and construction is underway on both of them. Release of the reversion would also require that the City of Los Angeles and/or the State of California have completed the plans for a park, coordinated those plans with the Air Force, and firmly committed the necessary funds for construction of a park on White Point.

We are prepared to proceed immediately with completion of the environmental process, and appear before the California Coastal Commission with the new development plan for White Point. Before doing so, we need your assurance of active support by the City of Los Angeles in all forums regarding site selection and environmental analyses for this plan. We also need a formal agreement that the City of Los Angeles will transfer the agreed properties to the US Government 14 working days following a request by the US Department of the Interior.

In anticipation of the City's full support we have revised our plan to favor your proposal as our preferred siting. In the meantime, critical time has elapsed and it's necessary that we be able to proceed now. We ask that the City reply as soon as possible, accepting the arrangements we have proposed in this letter. Please indicate specifically which option you prefer for the soccer field. We would appreciate your response by October 30, 1985. We need to start the contracting process so that our people can occupy these badly needed houses without further delay.

Sincerely

James F. Boatright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

DEPARTMENT OF THE AIR FORCE
WASHINGTON 20330

OFFICE OF THE ASSISTANT SECRETARY

November 6, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles CA 90012

Dear Ms Flores:

In my letter of October 22, 1985, I set out a comprehensive proposal for siting our 170-unit housing project on a combination of Bogdanovich Park and 20-25 acres on the eastern side of White Point. At our meeting the same day, I showed you conceptual layouts for siting the houses in several different ways. In conformance with community desires, in which we concur, the units are single family dwellings consistent with the surrounding houses. I asked for a response to this proposal by October 30; none has been received.

It is evident that conflicting community pressures will make a solution acceptable to all sides not only long delayed but highly unlikely. Even the City government itself is not in accord, as we learned October 22. We need to get on with this project, not for bureaucratic reasons or to meet artificial deadlines but because Air Force people need houses to live in at an economic cost they can afford.

If our discussions were leading expeditiously to a resolution, perhaps some small further delay could be tolerated. However, I see the picture becoming more complex daily, and the prospect for a negotiated resolution fast receding. Therefore, we have decided to proceed with a single site on White Point, as originally approved by the Congress. A notice of intent to prepare an environmental impact statement on a White Point site on an expedited schedule, consistent with applicable laws and regulations, will be filed shortly. We are announcing Bogdanovich Park and the Upper Reservation as alternatives. The final siting decision will draw on community input, environmental impact, and cost factors.

I regret that we were unable to reach a successful conclusion.

Sincerely,

James P. Bostright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

City Council of the City of Los Angeles

OFFICE OF THE PRESIDENT PRO TEMPORE

Joan Milke Flores
COUNCILWOMAN, 15TH DISTRICT

485-3347

November 19, 1985

Mr. James F. Boatright
Deputy Assistant Secretary of the Air Force
Department of The Air Force
Washington, D. C. 20330

Dear Mr. Boatright:

The City has had an opportunity to review your proposal in detail. We have also conferred with the State regarding the status of development at White Point Park.

Our goal has been to accommodate additional Air Force housing in our community while protecting the future of the already-funded $8 million White Point Regional Park project.

We believe our offer accomplishes both of these goals.

Since there seemed to have been some confusion on the part of the Air Force as to what the City meant by the "eastern portion of White Point," we have enclosed a map detailing approximately 9 acres on the far eastern portion of White Point which the City could make available to the Air Force in our compromise proposal.

In addition, we are offering Bogdanovich Park for military housing. As you can see by our staff drawings, the housing you desire can be built on these sites as a mixture of single family dwelling homes and attached homes. The plan for Bogdanovich follows the same general plan as the one you proposed and while not maximizing the number of homes on the site, represents a reasonable increase in density. The remaining units necessary to total 170 were placed at White Point in a straight forward design to minimize the impact of the housing on the State Park.

As you know, the Air Force has built attached units at the middle reservation and the Navy will be building attached units at Suanga Village in our community so we would have no problem with this arrangement. This compromise involves a great deal of sacrifice both to the City and the community. We are giving up the rights to an existing park and a portion of White Point, a highly sensitive region that represents the last large parcel of undeveloped publicly-owned coastal park property in the City.

ROOM 237, LOS ANGELES CITY HALL, LOS ANGELES, CA 90012

The State's representative, Mr. Anthony Ulm, has indicated that if more of White Point property than is being offered is taken, the project will lack significance for state park purposes and be abandoned. This action would represent the loss of existing allocated project development funds, and anticipated total State park expenditure approximating $8 million dollars. Even more importantly, the loss of this unquestionable unique park land will represent an unnecessary and unacceptable loss to present and future generations of Americans. He emphasizes that this eastern slice can be considered in this compromise proposal but only this eastern slice. Anything more will prompt the State to pull out of the project.

While granting these lands to you, we would ask only that you pay for the relocation of the ballfields at Bogdanovich Park to San Pedro Park or another nearby location and support the elimination of the reversionary clauses on the remaining property at White Point Park and Angel's Gate Park.

This proposal gives you the acreage necessary to house the men who work as liaisons with the local defense contractors and allows the City to proceed with the State on the development of the already-funded White Point Regional Park development.

I would add that the City unanimously supports this offer with the concurrence of State park officials. If this is acceptable, we will move immediately to accommodate your housing needs.

We and the community are eager, as you are, to have this matter resolved. Please let us know by the end of the year if this offer is acceptable. Our continued support for this compromise beyond December 31st depends on your acceptance of the conditions outlined above.

I am available to meet with you in Los Angeles or Washington to discuss this important issue.

Very truly yours,

Joan Milke Flores

JOAN MILKE FLORES
President Pro Tempore
Los Angeles City Council

JMF/vt

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

December 17, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Dear Ms. Flores:

The Air Force has reviewed the City of Los Angeles' proposal regarding the siting for housing to support Space Division as outlined in your November 19, 1985, letter. The proposal is not acceptable because it does not provide sufficient acreage for our housing development.

As I indicated in my letter of October 22, 1985, we are willing to accept split siting between Bogdanovich Park and White Point. However, we must insist that we get sufficient land to develop our housing complex. Our minimum requirement was stated in the previous letter as all of the economically buildable land on Bogdanovich Park, estimated to be about 16.5 acres, together with 20 acres of an eastern White Point site. After further study, we believe we could develop our housing on all of Bogdanovich together with 16 contiguous and economically buildable acres on White Point provided an adequate buffer zone around our housing was provided for in the park planning for the remainder of White Point. We have come a long way from our initial position of 50 acres, which is what we really need, and we are simply unwilling to further reduce the required acreage.

The following stipulations remain unchanged from our letter of October 22, 1985:

- The Air Force understands and appreciates the need to relocate the existing Bogdanovich sports fields. We are willing to contribute to the cost of moving them to another site provided by the City if, after contracting for construction, there are funds remaining in the appropriation for this project. As you know, our original funding request was reduced by the Congress. The delays in starting construction have eroded the purchasing power of our funds. Building on the two sites further complicates the financial picture.

- Regarding the reversion rights pertaining to White Point, the Air Force will support the City's request for a change in the reversion clause of the deed for the White Point land, to be effective when transfer of the Bogdanovich Park and White Point sites to the Air Force is final and construction is underway on both of them. Release of the reversion would also require that the City of Los Angeles and/or the State of California have completed the plans for a park, coordinated those plans with the Air Force, and firmly committed the necessary funds for construction of a park on White Point. The Air Force will oppose relinquishing reversion rights on any property other than White Point.

- We will need assurance of active support by the City of Los Angeles in all forums regarding site selection and environmental analysis for this plan. We will also need a formal agreement that the City of Los Angeles will transfer the agreed properties to the U.S. Government 14 working days following a request by the U.S. Department of the Interior.

As you are aware, the Air Force is now engaged in the Environmental Impact Statement (EIS) process on this matter. This formal process requires consideration of reasonable alternatives. If the City of Los Angeles submitted an alternative consistent with the above conditions, the Air Force would be pleased to accept the alternative. We are now in the "scoping phase" of the EIS process and such a proposal from the City would be most appropriate.

Thank you for your consideration on this important matter. I would be pleased to discuss or explain our position in more detail if you desire.

Sincerely,

James F. Boatright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

APPENDIX C—TRAFFIC REPORT

Weston Pringle and Associates

TRAFFIC & TRANSPORTATION ENGINEERING

May 28, 1986

Mr. Warren Pandorf
ESE, Inc.
P.O. Box ESE
Gainesville, FL 32602

Dear Mr. Pandorf:

This letter is to supplement our letter report of February 6, 1986, which reviewed traffic factors related to the Air Force Space Division Housing Project, San Pedro, California. Additional information was requested relative to potential impacts upon the freeway system. This letter is in response to that request.

Figure 2 of our report indicates that 1600 daily trips generated by the proposed project are expected to utilize the Harbor Freeway (I-110). Peak hour volumes are 105 AM and 130 PM for the project at the Harbor Freeway. Daily volumes on the freeway north of the Vincent Thomas Bridge are 60,000 daily trips and 5,800 peak hour. Project traffic would represent a 2.7 percent increase in daily traffic and 2.2 percent increase in peak hour traffic.

At the junction of the Harbor Freeway (I-110) and the San Diego Freeway (I-405), project trips will be dispersed and it is not possible to estimate with any accuracy the assignment to the various routes. Since all dwelling units would be occupied by Air Force personnel stationed at the Los Angeles Air Force Station in El Segundo, a total of 340 daily trips could be generated between these two locations. As stated in the report, studies have indicated that 85 percent of the officers would car pool and 15 percent would drive. This reduces the daily trips from San Pedro to El Segundo to 195 or 98 during both the AM and PM peak hours.

Daily traffic on the San Diego Freeway (I-405) reaches 238,000 north of Hawthorne Boulevard with a 18,300 peak hour volume. The project would represent a 0.08 percent increase in daily traffic and a 0.54 percent increase in peak hour traffic.

In summary, the project would have an extremely minor impact upon freeway traffic. Projected increases are less than the accuracy of the counting procedure. In addition, the nature of the project encourages ride sharing which reduces the potential traffic impacts over more standard residential development. Finally, these are not all new trips to the area but relocated trips from current residence to Air Force Housing.

* * * * *

We trust that this supplemental information will be of assistance to you. If you have any questions, please contact us.

Respectfully submitted,
WESTON PRINGLE & ASSOCIATES

Weston S. Pringle, P.E.
Registered Professional Engineer
State of California Numbers C16828 & TR565

WSP:bas
#84451

APPENDIX D--LATE SPRING VERTEBRATE FAUNAL SURVEY OF WHITE POINT PARK, UPPER FORT MACARTHUR, AND MARTIN J. BOGDANOVICH PARK

LATE SPRING

VERTEBRATE FAUNAL SURVEY

OF WHITE'S POINT PARK,

UPPER FORT MACARTHUR,

AND MARTIN J. BOGDANOVICH PARK

Dr. Michael A. Recht
Vertebrate Biologist

Paul Sonnenfeld
Environmental Scientist

May 1986

LATE SPRING VERTEBRATE FAUNAL SURVEY OF WHITE'S POINT PARK, UPPER FORT MACARTHUR, AND MARTIN J. BOGDANOVICH PARK

Surveys of the vertebrate fauna of the areas known as White's Point Park, Upper Fort MacArthur, and Martin J. Bogdanovich Park were conducted on May 12, 14, 16-18, 1986. The surveys consisted of an extensive walk over the respective sites with specific attention directed towards identification of extant species, tracks, fecal droppings, active burrows, and discussions with site users. Additionally, forty live-traps, in four strings, were placed in four separate areas of White's Point Park from May 16-17, 1986, to sample the small mammal population.

All of these sites were previously surveyed in 1985. Their habitats have not substantially changed. The following descriptions, presented in the 1985 report, apply today:

> White's Point Park--The White's Point parcel is an abandoned Nike missile site and consists primarily of a large tract of land of disturbed mustard-dominated grassland but also contains a number of paved roads, buildings, and other developments. Most of the site consists of open fields only a portion of which is disked over after the winter-spring growing season.
>
> Upper Fort MacArthur--The Upper Fort MacArthur parcel is a developed site containing numerous buildings, landscaped lawns, and paved areas as well as several open fields in which a weed-dominated vegetation develops after winter-spring rains. Vegetation on the site consists of various cultivars around the buildings and a

weedy grassland in the open undeveloped fields.

Martin J. Bogdanovich Park--This site, just northeast of White's point park by approximately .2 mile, is a former grassy-weeded slope with recreational facilities on its southern portion. A paved road, entering from 25th Street on the park's southern border, leads past the recreational facilities to the approximate center of the park and the grassy-weeded slopes of the northern portion of the park. The grassy-weeded northern portion of the park shows evidence of having been disked, apparently for fire control purposes.

White's Point Faunal Survey Summary Comments

The faunal composition did not, on the whole, differ significantly in ecotypes from those forms previously reported or expected. However, we did observe one mammalian species (House Mouse) which was expected but not previously seen, and two domestic mammalian species not previously expected which should have been (Domestic Dog, Domestic Cat). Although many of the bird species previously reported were seen again, newcomers were observed (Barn Swallow, Common Crow, Spotted Dove). Among the reptiles the warm weather brought out were three expected but not previously seen species (Western Fence Swift, Gopher Snake, California King Snake) and one previously reported species (Side-Blotched Lizard).

Upper Fort MacArthur Survey Summary Comments

The faunal composition did differ from our previous report in that although most of the species listed were observed again, four avian species previously listed were absent (Common Flicker, Audubon's Warbler, California Sea Gull, Raven). Ten avian species not previously reported were seen

(Herring Gull, Long-Billed Curlew, Townsend's Warbler, Wilson's Warbler, Cliff Swallow, American Goldfinch, Western Flycatcher, Scrub Jay, House Sparrow, Common Crow). The presence of one new reptile species was determined by the discovery of a fresh scat, unmistakeably that of a Horned Lizard, probably that of the Coast Horned Lizard.

Martin J. Bogdanovich Park Summary Comments

The faunal composition, while including most of the previously reported species, differed in that two species previously reported were absent (Red-Tailed Hawk, Say's Phoebe), and six previously unreported species were seen (Mockingbird, Brewer's Black Bird, Mourning Dove, Common Crow, Domestic Pidgeon, Cliff Swallow). Once again, although no gophers were seen, fresh mounds were observed.

KEY TO CHARTS

All abundance terms are relative to normal density of the species.

A = abundant, very numerous and easily verified
C = common, moderate numbers and verifiable
U = uncommon, infrequently found
E = endangered
PR = previously reported
N = new sighting

MAMMALS OF WHITE'S POINT PARK

	Site	Presence Determined M	W	F	Sa	Su
Opposum *Didelphis marsupialis*	C	hypo				
Ornate Shrew *Sorex ornatus*	U	hypo				
Broad-footed Mole *Scapanus latimanus*	C	hypo				
California Myotis *Myotis californicus*	U	hypo				
Pallid Bat *Antrozous pallidus*	U	hypo				
Brush Rabbit *Sylvilagus bachmani*	C	hypo				
Audubon Cottontail *Sylvilagus auduboni*	A		1,PR			
California Ground Squirrel *Spermophilus beecheyi*	A	PR				
Botta Pocket Gopher *Thomomys bottae*	A	numerous active mounds, bones in scats, PR				
California Pocket Mouse *Perognathus californicus*	U	hypo				
Western Harvest Mouse *Reithrodontomys megalotis*	U	hypo				
House Mouse *Mus musculus*	C			2,N		
Black Rat *Rattus rattus*	U	not seen, droppings PR				
Deer Mouse *Peromyscus maniculatus*	C	hypo				
California Mouse *Peromyscus californicus*	U	hypo				
California Vole *Microtus californicus*	C	not seen, runs PR				

	Site	Presence Determined M	W	F	Sa	Su
Coyote Canis latrans	U	hypo				
Gray Fox Urocyon cinereoargenteus	U	not seen, presence previously reported by site users				
Domestic Dog Danis Familiaris	C	2,N				
Domestic Cat Felis Cattus					1,N*	
Long-Tailed Weasel Mustela frennata	U	hypo				
Striped Skunk Mephitis mephitis	C	PR				
Spotted Skunk Spilogale putorius	C	hypo				

*dead

BIRDS OF WHITE'S POINT PARK

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Turkey Vulture *Cathartes aura*		U					
Red-tailed Hawk *Buteo jamaicensis*	C		1,PR	1			
Cooper's Hawk *Accipiter cooperi*	U						
Sparrow Hawk *Falco sparverius*	C		3,PR	1	3	3	3
California Gull *Larus californicus*		C	PR				
Herring Gull *Larus argentatus*		C	PR				
California Quail *Lophortyx californius*	U						
Mourning Dove *Zenaidura macroura*	A		13,PR	4	8	6	7
Domestic Pigeon *Columba livia*	A		2,PR		1	2	16
Barn Owl *Tyto alba*	U						
Great Horned Owl *Bubo virginianus*	U						
Burrowing Owl *Speotyto cunicularia*	C		PR				
White-throated Swift *Aeronautes saxatalis*	U						
Killdeer *Charadrius vociferus*	C		PR				
Anna's Hummingbird *Calypte anna*	C		1,PR	2			1
Allen's Hummingbird *Selasphorus rufus*		U					

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Ring-necked Pheasant Phasianus colchicus	U		PR				
Say's Phoebe Sayornis saya	U		3,PR				
Cliff Swallow Petrochelidon pyrrhonota	C		8	4			4
Raven Corvus corax	C		4,PR				
Common bushtit Psaltriparis minimum	U						
Wrentit Chamaea fasciata	U						
Mockingbird Mimus polyglottos	C		1,PR		1	1	
Loggerhead Shrike Lanius ludovicianus	C		3,PR	2		1	2
Robin Turdus migratorius	C						
Starling Sturnus vulgaris	A		24,PR	13	7	9	20
Audubon's Warbler Dendroica auduboni	U						
House Sparrow Passer domesticus	C						
Western Meadowlark Sturnella neglecta	A		6,PR	2	1	2	2
Brewer's Blackbird Euphagus cyanocephalus	C						
House Finch Carpodacus mexicanus	A		21,PR	3	6	10	6
Lessor Goldfinch Spinus psaltria	U						
Brown Towhee Pipilo fuscus	U				1,PR	1	

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Savannah Sparrow *Passerculus sandwichensis*	C		PR				
White-Crowned Sparrow *Zonotrichia leucophrys*	C		PR				
Oregon Junco *Junco hyemalis*		C					
Common Flicker *Colaptes auratus*	C		PR				
Barn Swallow *Hirundo rustica*		U	1,N				
Common Crow *Corvus brachyrhynchos*		C		2,N	1	1	
Spotted Dove *Streptopelia chinensis*	C?	C			2,N	2	2

REPTILES OF WHITE'S POINT PARK

	Site	Presence Determined M	W	F	Sa	Su
Western Fence Lizard *Sceloporus occidentalis*	C			1,N	1	1
Side-blotched Lizard *Uta stansburiana*	C		2,PR			
Coast Horned Lizard *Phrynosoma coronatum*	U	hypo				
Southern Alligator Lizard *Gerrhonotus multicarinatus*	C	PR				
Western Whiptail *Cnemidophorus tigris*	U	hypo				
Ringneck Snake *Diadophus punctatus*	C	hypo				
Racer *Colaber constrictor*	U	hypo				
Striped racer *Masticophis laterialis*	U	hypo				
Coachwhip *Masticophis flagellus*	C	hypo				
Gopher Snake *Pituophis melanoleucus*	C					1,PR
California Kingsnake *Lampropeltis getulus*	C			1,N*		1
Western Rattlesnake *Crotalus viridis*	U	hypo				

*dead

AMPHIBIANS OF WHITE'S POINT PARK

	Site	Presence Determined M	W	F	Sa	Su
Garden Slender Salamander *Batrachoseps major*	C	hypo				
Western Toad *Bufo boreas*	U	hypo				

MAMMALS OF UPPER FORT MACARTHUR

	Site	Presence Determined M W F Sa Su
California Ground Squirrel *Spermophilus beecheyi*	C	not seen, 2 active mounds PR
Botta Pocket Gopher *Thomomys bottae*	C	many active borrows
Domestic Cat *Felis catus*	C	1,PR
House Mouse *Mus musculus*	C	hypo
Black Rat *Rattus rattus*	U	hypo
Norway Rat *Rattus norvegicus*	U	hypo
California Myotis (Bat) *Myotis californicus*	U	hypo
Pallid Bat *Antrozous pallidus*	U	hypo
Long-tailed Weasel *Mustela frenata*	U	hypo
Audubon's Cottontail *Sylvilagus auduboni*	U	hypo

BIRDS OF UPPER FORT MACARTHUR SITE

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Herring Gull *Larus argentatus*		C		1,N flyover			
Long-Billed Curlew *Numenius americanus*	U?	U		1,N flyover			
Townsend's Warbler *Dendroica townsendi*		U	6,N				
Wilson's Warbler *Wilsonia pusilla*	U					1,N	
Cliff Swallow *Petrochelidon pyrrhonota*		C	3,N				
Meadowlark *Sturnella neglecta*	C		4,PR			5	1
Starling *Sturnus vulgaris*	C		37,PR	35	10	20	9
House Finch *Carpodacus mexicanus*	A		4,PR	8	5	7	8
American Goldfinch *Spinus tristis*	U						2,N
Common Flicker *Colaptes auratus*	C		PR				
Audubon Warbler *Dendroica audubonì*	U		PR				
Spotted Dove *Streptopecia chinensis*	C		5,PR	1		5	1
California Sea Gull *Larus californicus*	C		PR				
Loggerhead Shrike *Lanius ludovicianus*	U		1,PR	12		3	4
Red-Tailed Hawk *Buteo jamaicensis*		U				1,PR	1
Sparrow Hawk *Falco sparverius*	U		1,PR			3	1

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Mourning Dove *Zenaidura macroura*	C		10,PR	3	4	3	2
Domestic Pigeon *Columbia livia*	C	A	10,PR	6	70	8	16
Anna's Hummingbird *Calypte anna*	A		1,PR	1			
Say's Phoebe *Sayornis saya*	U		PR				
Western Flycatcher *Empidonax difficilis*	U					1,N	
Raven *Corvus corax*		U	PR				
Mockingbird *Mimus polyglottos*	C		6,PR		1	2	1
Scrub Jay *Aphelocoma coerulescens*	C			1,N			
House Sparrow *Passer domesticus*	C		2,N				
Common Crow *Corvus brachyrhynchos*	C		13,N	1	1	2	

REPTILES OF UPPER FORT MACARTHUR

	Site	Presence Determined M	W	F	Sa	Su
Western Fence Lizard *Sceloporus occidentalis*	C	hypo				
Side-Blotched Lizard *Uta stansburiana*	C	PR				
Southern Alligator Lizard *Gerrhonotus multicarinatus*	C	PR				
Ringneck Snake *Diadophus punctatus*	U	hypo				
Coachwhip *Masticophis flagellum*	U	hypo				
Gopher Snake *Pituophis melanoleucus*	U	hypo				
California Kingsnake *Lampropeltis getulus*	U	hypo				
Western Terrestrial Garter Snake *Thamnophis elegans*	U	hypo				
Western Rattlesnake *Crotalus viridis*	U	hypo				
Coast Horned Lizard *Phrynosoma Coronatum*	U				fecal droppings,N	

AMPHIBIANS OF UPPER FORT MACARTHUR

	Site	Presence Determined M	W	F	Sa	Su
Garden Slender Salamander *Batrachoseps major*	C	hypo				
Western Toad *Bufo boreus*	U	hypo				

MAMMALS OF THE MARTIN J. BOGDANOVICH PARK

	Site	Presence Determined M	W	F	Sa	Su
Botta Pocket Gopher *Thomomys bottae*	C	fresh mounds, PR	fresh mounds		fresh mounds	
Audubon's Cottontail *Sylvilagus auduboni*	C	hypo				
Domestic Cat *Felis catus*	C	hypo				
House Mouse *Mus musculus*	C	hypo				

BIRDS OF THE MARTIN J. BOGDANOVICH PARK

	Resident/ Breeding	Foraging/ Migrating	Number Actually Observed M	W	F	Sa	Su
Meadowlark *Sturnella neglecta*	C		1,PR	2		1	
Starling *Sturnus vulgaris*		C	26,PR	20	92	16	11
Raven *Corvus corax*		C	PR				
House Finch *Carpodacus mexicanus*	C			4,PR		5	1
Sparrow Hawk *Falco sparverius*		C	1,PR	1			
Red-Tailed Hawk *Buteo jamaicensis*		C	PR				
Say's Phoebe *Sayornis saya*		C	PR				
Mockingbird *Mimus polyglottos*		C	1,N			1	1
Brewer's Blackbird *Euphagus cyanocephalus*		C	26,N				
Mourning Dove *Zenaidura macroura*		C		3,N			5
Common Crow *Corvus brachyrhynchos*		C		1,N		2	
Domestic Pidgeon *Columbia livia*		C		2,N			2
Cliff Swallow *Petrochelidon pyrronota*		C				2,N	1

REPTILES OF THE MARTIN J. BOGDANOVICH PARK

	Site	Presence Determined M	W	F	Sa	Su
Side-Blotched Lizard *Uta stansburiana*	C	hypo				
Western Fence Swift *Sceloporus occidentalis*	C	hypo				
Gopher Snake *Pituophis melanoleucus*	C	hypo				
California Kingsnake *Lampropeltis getulus*	C	hypo				

AMPHIBIANS OF THE MARTIN J. BOGDANOVICH PARK

	Site	Presence Determined M	W	F	Sa	Su
Garden Slender Salamander *Batrachoseps major*	U	hypo				
Western Toad *Bufo boreus*	U	hypo				

6957 Hazeltine Ave. #2
Van Nuys, CA 91405
June 5, 1986

Mr. Warren Pandorf, P.E.
ESE, Inc.
P.O. Box ESE
Gainsville, FL 22602

Dear Mr. Pandorf:

In response to your query as to the importance of White's Point Park as a component of the Pacific Flyway, we would say that the Park's value is negligible. Several factors lead to this determination:

Few trees are present at the site that could provide sufficient cover or habitat for migrating species;

The lack of standing or free water greatly reduces the attractiveness of the park for migrating water fowl;

The grassland areas are disked for fire suppression each year to reduce fuel loads and control weed growth;

The expansive nature of the underlying soil inhibits growth of larger shrubs, further maintaining a grassland habitat;

Historically, as a former military installation, the area of White's Point Park does not appear to have maintained significant populations of migrant birds.

Therefore, we can state with a high degree of accuracy that the value of White's Point Park as a component of the Pacific Flyway is minimal.

Respectfully yours,

Michael A. Recht, Ph.D.
Vertebrate Biologist

Paul Sonnenfeld
Environmental Scientist

APPENDIX E--ENTOMOLOGICAL REPORT

ENTOMOLOGICAL CONSULTING SERVICES

50 Cleaveland Road # 3

Richard A. Arnold, Ph.D. Pleasant Hill, California 94523 (415) 825-3784

5 June 1986

Mr. Warren Pandorf, P.E.
Water Resources Engineer
Environmental Science & Engineering, Inc.
P.O. Box ESE
Gainesville, Florida 32602

Dear Warren:

This letter reports the findings of my supplemental vegetation surveys during May and June at three parks near San Pedro, California: 1) White Point (WP), 2) Upper Reservation area of old Ft. MacArthur (UR), and 3) Martin J. Bogdanovich Park (MB). The findings presented in this letter supplement those presented in my earlier reports dated 7 January, 4 March, and 2 April 1986.

At each study site the flora was inventoried, plus any mowing and disking patterns were noted. Also, the status of specimens of Astragalus trichopodus var. lonchus (Fabaceae), observed during my earlier surveys at WP and UR, is updated. This legume is the larval foodplant for the endangered Palos Verdes Blue butterfly.

Survey Methods

The flora was inventoried by walking transects throughout all open-space areas of each study site. Transects were spaced at approximately 100-foot intervals. Areas dominated by ice plant, landscape species, gardens, buildings or athletic fields were less intensively surveyed.

Results of Floral Inventory

Very little native vegetation of the coastal sage scrub and coastal grassland vegetation types can still be found at the three study sites due to extensive habitat disturbance. Rather, the late spring and early summer flora at all three sites consists of a ruderal mix of weeds and annual grasses, characteristic of highly disturbed localities in Southern California. As noted in my earlier vegetation report (dated 7 January 1986), I refer to this vegetation type as the "fennel-mustard-grassland" vegetation type. Several introduced weeds, notably Foeniculum vulgare (fennel), Brassica nigra (black mustard), and Raphanus sativus (wild radish), plus assorted weedy grasses, including Avena barbata, Bromus diandrus, Bromus rubens, and Hordeum vulgare, characterize this vegetation type. Other dominant weeds include Salsola Kali, Amaranthus graecizans, Atriplex semibaccata, Melilotus indicus, Malva parviflora, Cynodon dactylon, and Euphorbia albomarginata. Only the latter species is a native plant; however, it is widespread in disturbed areas of Southern California.

Appendix A lists the nineteen new plant species identified at the three sites during my field surveys conducted in May and June. Plant nomenclature follows Munz (1969, A California Flora). Most of these species are summer-flowering, weedy annuals that were not apparent during my winter plant surveys (see my report dated 7 January 1986). Only two native plants were noted: 1) Lupinus nanus, which grew in widely scattered patches at UR and WP; and 2) Heterotheca grandiflora, which grew on a few hillsides at WP and less densely vegetated areas at UR. Although this latter species is a native, as Munz (1969) noted that it often "behaves like a weed".

White Point:

The entire site, except for the garden area, was resurveyed. All nineteen new plant species were observed here, including both native species. Lupinus nanus grew in a few small patches within the fennel-mustard-grassland. Heterotheca grandiflora was observed as solitary, widely scattered individuals growing along trails and roadsides on the hills.

Of the 82 plants inventoried during all surveys at WP, only eight native species were observed. However, two of the natives, Eriogonum cinereum and Astragalus trichopodus were represented by only one specimen, and the last Astragalus now appears to be dead (see section titled "Status of Astragalus). Two other native species, Heterotheca grandiflora and Euphorbia albomarginata, often grow in disturbed areas throughout Southern California.

Pogdanovich Park:

My inventory concentrated on the open space sector behind the athletic fields. Ten new species, all weeds, were noted growing within this portion of the park during my May and June surveys.

During all surveys at PP, 56 plant taxa were observed. Euphorbia albomarginata was the only native species observed during my surveys.

Upper Reservation at Fort MacArthur:

In May and June, I primarily resurveyed all open-space areas, but also briefly examined all landscaped areas and those dominated by ice plant and eucalyptus. Seventeen of the new plants were observed, including both native plants. Lupinus nanus was found at a few widely scattered sites in the fennel-mustard-grassland, primarily in areas where the fennel and mustard were sparse. Heterotheca grandiflora was noted growing along a few roadsides and other bare areas.

During all surveys at UR, 90 plant taxa were noted, including six native species. Two species are trees that were probably planted as landscaping. Two other species, Heterotheca grandiflora and Euphorbia albomarginata, are natives that frequently grow in disturbed habitats.

Disking

No obvious signs of recent disking in 1986 were observed at WP, PP, or UR. At PP, the athletic fields and associated peripheral areas were mowed, but remaining open space at the back of the park was overgrown by the fennel-mustard-grassland vegetation. A limited amount of mowing and clearing of vegetation was noted at UR, primarily where the fennel-mustard-grassland vegetation grew next to buildings. Presumably, the disking for fire control will be done later this year.

Status of Astragalus

Sixteen specimens of the larval foodplant for the endangered Palos Verdes Blue butterfly were observed at UR, in the area described in my report dated 4 March 1986. During my spring field work I had noted 18 specimens growing there, including 6 mature plants and 10 seedlings. Two of the seedlings have perished since my last visit to the site, apparently due to natural causes with the onset of the dry season.

The lone remaining Astragalus plant at WP appears to have died since my last visit to this site. The small amount of foliage that I observed earlier this spring, has withered, and the plant did not exhibit any other signs of life. You should recall that during my earlier site visits I had noted that this specimen was senescing. As no new Astragalus seedlings have been observed at WP since 1983 and the last mature plant did not flower in 1986, it seems unlikely that the Astragalus will be able to naturally re-establish itself at WP in the near future. However, if the vegetation at WP was actively managed to reduce the resident weed and grass cover and open up areas for colonization, then the Astragalus could probably be re-established there.

Summary and Recommendations

Field surveys in late spring and early summer yielded an additional nineteen plant taxa for my floral inventories at WP, PP, and UR. During my winter and early spring surveys I had previously identified 35 plant species. Only two of the nineteen additional species were natives, with one being a frequent innabitant of disturbed areas. The remaining 17 species are naturalized weeds from European and Mediteranean regions, and include primarily summer-flowering composites and legumes. These findings substantiate the conclusions presented in my earlier reports: 1) all three sites are highly disturbed; 2) the primary vegetation at each site consists of weeds and introduced grasses; and 3) very little native vegetation now grows at the three parks.

If land-use planning decisions and construction activities are delayed until the 1987 flight season of the Palos Verdes Blue butterfly, I recommend that a follow-up survey be conducted at that time to insure that the butterfly is absent from the proposed project site. It would also be advisable to verify the status of the Astragalus, as its numbers could increase or new patches of this plant could become established at a project site after the onset of the next rainy season. For example, at UR, where six of the resident Astragalus plants flowered and produced seed pods in

1996, new seedlings are likely to germinate after next winter's rains begin. As the current Astragalus plants grow on an embankment adjacent to a road, rains could wash the seeds to another area at UR before they germinate.

Please feel free to contact me if you have questions or need additional information.

Sincerely,

Richard A. Arnold

Richard A. Arnold, Ph.D.

APPENDIX A

Supplemental Plant Inventory for White Point Park (WP), Martin J. Bogdanovich Park (MB), and the Upper Reservation Area of old Ft. MacArthur (UR)

Plant Taxon (* = native species)	Study Site WP	MP	UR
ASTERACEAE			
Carduus pycnocephalus	x	x	x
Chrysanthemum coronarium	x	x	x
Cirsium vulgare	x	x	x
*Heterotheca grandiflora	x		x
Lactua Serriola	x		x
Silybum Marianum	x		x
CHENOPODIACEAE			
Bassia hyssopifolia	x		x
FABACEAE			
Latnyrus odoratus	x		x
*Lupinus nanus	x		x
Medicago nispida	x	x	x
Medicago lupulina	x	x	x
Medicago sativa	x		x
Meliotus alba	x	x	x
Vicia sativa	x	x	x
OXALIDACEAE			
Oxalis corniculata	x	x	x
PORTULACACEAE			
Portulaca oleraceae	x	x	x
RUBIACEAE			
Galium Aparine	x		
SCROPHULARIACEAE			
Linaria sp.	x		x
Plantago lanceolata	x	x	x

ENTOMOLOGICAL CONSULTING SERVICES

50 Cleaveland Road # 3

Richard A. Arnold, Ph.D. Pleasant Hill, California 94523 (415) 825-3784

10 June 1986

Mr. Chuck Hendry
Environmental Science & Engineering, Inc.
P.O. Box ESE
Gainesville, Florida 32602

Dear Mr. Hendry:

Warren Pandorf sent me a copy of the California Dept. of Fish & Game's (CDFG) letter, dated 26 May, regarding the Draft EIS for the U.S. Air Force's proposed housing project near San Pedro, California. The purpose of my letter is to respond to CDFG's concerns about the potential impacts the proposed project at White's Point Park (WP) might have on the endangered Palos Verdes Blue butterfly (PVBB). In particular, CDFG is concerned about statements in the Draft EIS on pp. 5-23 and 5-24 regarding the PVBB's possible utilization of its remaining foodplant, Astragalus trichopodus, at WP. The following information addresses CDFG's concerns.

After an exhaustive search of the entire WP site during December 1985, I noted only two specimens of the Astragalus foodplant growing there. At that time, I observed that both plants were senescing and producing very little vegetation. One of the plants died before my field studies conducted in late February and March 1986. The remaining plant produced leaflets on about six branches, but did not flower in 1986. It subsequently expired sometime between my March and May 1986 visits to WP. Thus at this time there are no specimens of Astragalus trichopodus growing at WP.

Adult females of the endangered PVBB lay their eggs on flowers of the Astragalus, and PVBB larvae feed only on the developing flowers and seedpods of this legume. Since the lone remaining Astragalus plant at WP did not produce any flowers or seedpods during 1986, this plant could not have supported any individuals of the endangered butterfly during this year. To confirm this, I carefully monitored this plant on several ocassions during the butterfly's 1986 adult flight season and larval development period. Despite intensive searches, no life stages of the endangered butterfly were observed at WP in 1986.

During 1983, 1984, and 1985, I observed only three mature Astragalus plants at WP. No seedlings were produced during this period, probably due to the extensive ground cover of weeds and annual grasses, which quickly outcompete Astragalus seedlings. As the remaining Astragalus plants died during this year without producing any seeds, it seems unlikely that the Astragalus will be able to naturally re-establish itself at WP. It might be possible to re-establish Astragalus at the proposed project site, if the weeds and annual grasses were properly managed. Lacking such direct intervention, I doubt that the WP site will be able to support the Astragalus and PVBB in the near future.

I hope that the above information clarifies my survey findings.

Sincerely,

Richard A. Arnold

Richard A. Arnold

APPENDIX F--LETTER FROM EXECUTIVE OFFICE OF THE PRESIDENT TO GENERAL SERVICES ADMINISTRATION

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

DE

APR 12 1985

To	Rec'd	Ltr
D	4/15	4/24
Coord:		
Sign:		A
Appr:		
Info		
Cy to:		
Info to	A, FG	

Honorable Dwight Ink
Acting Administrator
General Services Administration
Washington, D.C. 20405

Dear Mr. Ink:

The 1985 Defense military construction request included $1.4 million to acquire land at Fort MacArthur for Air Force family housing. This property was originally excessed and conveyed to the City of Los Angeles without payment in 1978, with a reversion provision requiring that the property be used for park purposes or revert to the Federal Government. The City of Los Angeles has now proposed a plan to use only a portion of the property for a park and will convey the balance back to the U.S. Government for use by the Air Force to address its serious shortage of affordable housing in the Los Angeles area.

Unfortunately, the Congress deleted the 1985 funds for land acquisition while retaining authorization for housing.

We have again requested these funds in the 1986 budget. However, in that the situation now demands immediate attention and in that the reversion provision does require conveyance to the U.S. Government, I believe that the Fort MacArthur acquisition is extraordinary.

I, therefore, request that you proceed to reacquire the 50 acres at White Point, California, formally part of Fort MacArthur, and transfer this property to the Air Force without requiring reimbursement.

Sincerely,

David A. Stockman
Director

N85-12136

APPENDIX G

LETTERS FROM USAF TO
MR. VINCE BUDROVICH AND
TO COUNCILWOMAN FLORES

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SPACE DIVISION (AFSC)
LOS ANGELES AIR FORCE STATION, PO BOX 92960
LOS ANGELES, CA 90009-2960

02 MAY 1986

Mr Vince Budrovich
730 South Patton Ave.
San Pedro, CA 90731

Dear Mr. Budrovich

As I stated during the 22 April 86 Public Hearing on the Draft EIS for the Space Division San Pedro Housing Project, the Air Force has consistently been willing to evaluate any reasonable alternative, to our housing at White Point, brought to our attention. I made the same statement at the 11 December 85 Public Scoping Meeting. To date, no additional reasonable alternatives, other than those included in the Draft EIS, have been identified by the public.

Our evaluation of alternatives for housing of military members assigned to Space Division dates back to 1979. We began with approximately 40 regional and local sites. Based on existing use and other factors, this list of 40 was narrowed to 20 sites for evaluation in this Draft EIS. These 20 sites included 17 regional sites and 3 local sites: White Point, Bogdanovich Park and the Upper Reservation to Fort MacArthur. These 20 sites are discussed in Section 3.0 of the Draft EIS. It is important to note that Bogdanovich Park and the Upper Reservation were originally found by the Air Force not to be viable sites due to their existing use. However, these sites were included in the Draft EIS based on the parcels being offered by the City of Los Angeles as an alternative to all 170 units being constructed at White Point.

Included in our evaluation of alternatives for 170 units at White Point were three alternatives that would not require construction by the Air Force. These were: a leased housing program, purchasing of existing units, and private construction in conjunction with a long-term lease by the Air Force. As discussed in Section 3.4 of the Draft EIS, none of these are feasible.

In light of the above and supported by the Draft EIS, I feel the Air Force has identified and discussed all reasonable alternatives to construction of 170 units at White Point. However, if there are reasonable alternatives known to you or others that we have not evaluated, please provide as much information as you can and we will evaluate the alternative. As to your request to extend the comment period, the Air Force will accept comments on the Draft EIS, including information concerning viable alternatives, through 27 May 86. The National Environmental Policy Act and the implementing regulation of the President's Council on Environmental Quality determined that a 45 day public and agency comment period on a Draft EIS is sufficient to allow adequate input from the public and agencies. 27 May 86 is the end of the 45 day comment period that began on 11 April 86 for this Draft EIS and we see no value in extending the comment period at this time.

Please feel free to provide any information you may have on alternative sites or any other aspect of the Draft EIS in writing by 27 May 86 to:

Headquarters Space Division/DEV
Attn: Mr Robert Mason
P.O. Box 92960
Los Angeles, CA 90009-2960

Sincerely

RAYMOND E. RODGERS, Jr., Colonel, USAF
Director of Acquisition Civil Engineering

DEPARTMENT OF THE AIR FORCE
WASHINGTON, D.C. 20330-1000

OFFICE OF THE ASSISTANT SECRETARY

December 17, 1985

Councilwoman Joan Milke Flores
Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Dear Ms. Flores:

The Air Force has reviewed the City of Los Angeles' proposal regarding the siting for housing to support Space Division as outlined in your November 19, 1985, letter. The proposal is not acceptable because it does not provide sufficient acreage for our housing development.

As I indicated in my letter of October 22, 1985, we are willing to accept split siting between Bogdanovich Park and White Point. However, we must insist that we get sufficient land to develop our housing complex. Our minimum requirement was stated in the previous letter as all of the economically buildable land on Bogdanovich Park, estimated to be about 16.5 acres, together with 20 acres of an eastern White Point site. After further study, we believe we could develop our housing on all of Bogdanovich together with 16 contiguous and economically buildable acres on White Point provided an adequate buffer zone around our housing was provided for in the park planning for the remainder of White Point. We have come a long way from our initial position of 50 acres, which is what we really need, and we are simply unwilling to further reduce the required acreage.

The following stipulations remain unchanged from our letter of October 22, 1985:

- The Air Force understands and appreciates the need to relocate the existing Bogdanovich sports fields. We are willing to contribute to the cost of moving them to another site provided by the City if, after contracting for construction, there are funds remaining in the appropriation for this project. As you know, our original funding request was reduced by the Congress. The delays in starting construction have eroded the purchasing power of our funds. Building on the two sites further complicates the financial picture.

02

- Regarding the reversion rights pertaining to White Point, the Air Force will support the City's request for a change in the reversion clause of the deed for the White Point land, to be effective when transfer of the Bogdanovich Park and White Point sites to the Air Force is final and construction is underway on both of them. Release of the reversion would also require that the City of Los Angeles and/or the State of California have completed the plans for a park, coordinated those plans with the Air Force, and firmly committed the necessary funds for construction of a park on White Point. The Air Force will oppose relinquishing reversion rights on any property other than White Point.

- We will need assurance of active support by the City of Los Angeles in all forums regarding site selection and environmental analysis for this plan. We will also need a formal agreement that the City of Los Angeles will transfer the agreed properties to the U.S. Government 14 working days following a request by the U.S. Department of the Interior.

As you are aware, the Air Force is now engaged in the Environmental Impact Statement (EIS) process on this matter. This formal process requires consideration of reasonable alternatives. If the City of Los Angeles submitted an alternative consistent with the above conditions, the Air Force would be pleased to accept the alternative. We are now in the "scoping phase" of the EIS process and such a proposal from the City would be most appropriate.

Thank you for your consideration on this important matter. I would be pleased to discuss or explain our position in more detail if you desire.

Sincerely,

James F. Boatright
Deputy Assistant Secretary of the Air Force
(Installations, Environment and Safety)

APPENDIX H

CONGRESSIONAL RECORD--HOUSE (OCTOBER 10, 1984)

Construction improvements	100,000,000
General reduction	0
Operations:	
Services	44,500,000
Utilities	285,000,000
Furnishings	112,800,000
Miscellaneous	1,000,000
Leasing	105,000,000

California—Fort Ord: Trailer pads.—The conferees agreed that the Army is to construct 70 trailer pads estimated to cost $1,081,000 out of funds available in the family housing construction account.

California—Sierra Army Depot: Family housing units.—The conferees have agreed to provide $400,000 to acquire title to 125 units of Wherry housing at this location and $5,130,000 to construct 80 units of new housing.

Maryland—Aberdeen Proving Ground: 439 family housing units.—The conferees endorse the authorization of $30,792,000 for 439 new family housing units at Aberdeen Proving Ground, Maryland. The conferees direct the Army to use $7,746,000 requested in the improvements account for this installation and available savings to construct these new units. This project should be submitted as a reprogramming when it is ready for execution.

Texas—Fort Hood: 20 family housing units.—The conferees have agreed to provide $1,950,000 for 20 units of new housing at Fort Hood. The conferees direct that 20 units be built with the funds provided.

Construction improvements.—The conferees have agreed that the Army is to accomplish the $4,800,000 improvement project at Fort Monmouth, New Jersey, out of the $100,000,000 provided for this account.

Family Housing, Navy

The conferees agreed to an appropriation of $681,075,000 for Family housing, Navy, instead of $674,368,000 as proposed by the House and $686,897,000 as proposed by the Senate. The conferees are agreed that $117,027,000 is appropriated for construction, $538,602,000 is appropriated for operation and maintenance, and $25,446,000 is appropriated for debt payment. The conferees have agreed to the following addition to the amounts and line items as proposed by the House:

Alaska—NS Adak: 405 family housing units	+$6,707,000

The conferees agreed to fund all other items in conference at the level proposed by the House, as shown below:

California—MCB Camp Pendleton: 360 family housing units	$20,000,000
Virginia—AEGIS Combat Systems Center Wallops Island: 28 family housing units	2,170,000
Cuba—NS Guantanamo Bay: 100 family housing units	9,350,000
Operations:	
Management	38,200,000
Services	28,000,000
Utilities	160,000,000
Furnishings	13,000,000
Leasing	19,000,000
Maintenance	280,000,000

Alaska—NS Adak: 405 family housing units.—The conferees have approved $53,107,000 for this project. The Navy is not to use additional savings for this project unless it is specifically approved in a reprogramming request.

California—MCB Camp Pendleton: 360 family housing units.—The conferees have agreed to provide $20,000,000 for the 360 new units requested. In addition, the amount of $15,000,000 has been provided towards the construction of 647 new units for E-4s and below. These funds along with the proceeds of the sale of the existing complex will be used to fund this project. The Navy is to submit this project for approval via a reprogramming prior to contract award.

Family Housing, Air Force

The conferees agreed to an appropriation of $912,043,000 for family housing, Air Force, instead of $882,134,000 as proposed by the House and $868,080,000 as proposed by the Senate. The conferees are agreed that $181,123,000 is appropriated for construction, $700,940,000 is appropriated for operations and maintenance, and $29,980,000 is appropriated for debt payment. The conferees have agreed to the following additions and deletions to the amounts and line items as proposed by the House:

California—Fort MacArthur: 140 family housing units	+$11,800,000
Germany—Classified location: 180 family housing units	+13,500,000
Italy—Comiso: 460 family housing units	−8,100,000
Korea—Osan AB: Utilities	+2,700,000
Construction improvements	+10,009,000
Total	+29,909,000

The conferees agreed to fund all other items in conference at the level proposed by the House, as shown below:

Montana—Conrad AFS: 40 family housing units	$2,950,000
Wyoming—F.E. Warren AFB: 265 family housing units	16,300,000
United Kingdom:	
RAF Bentwaters: 200 family housing units	16,200,000
RAF Greenham Common: 250 family housing units	17,800,000
General reduction	0
Operations:	
Management	25,300,000
Services	22,000,000
Utilities	230,000,000
Furnishings	40,000,000
Miscellaneous	1,380,000
Leasing	53,000,000
Maintenance	329,260,000

California—Forth MacArthur: 140 family housing units.—The conferees have agreed to provide $11,800,000 for 140 housing units in support of the Air Force Space Division personnel in Los Angeles, California. However, funds have not been approved for land acquisition, and appropriated funds are not to be used for this purpose. The conferees endorse the position outlined in the fiscal year 1985 Military Construction Authorization Act which prohibited the use of appropriated funds to pay for land transfers. The conferees do not concur with the Executive Branch policy of requiring one federal agency to pay another for federal land. If the Air Force is unable to resolve the issue regarding the proposed site, they should work with the city to find an alternative site. None of the funds appropriated for construction are to be obligated until the Committees on Appropriations have been notified concerning the disposition of the site.

Italy—Comiso: 460 family housing units.—The conferees have agreed to provide $32,200,000 for 460 units of housing at Comiso AB, Italy. Obligation of these funds is contingent upon submission of the signed agreement on the use of U.S. manufactured housing. Any future proposed lease-construct agreements for housing at this location must meet the cost effectiveness test as required by law.

Korea—Osan AB: Utilities.—The conferees have agreed to fund the utility extension at Osan but caution that it is not to be construed as an endorsement of accompanied tours at this location.

Construction improvements.—The conferees have approved the $62,173,000 requested for construction improvements. The conferees have approved the funding for the five improvement projects denied by the House on the condition that all future requests for improvement projects clearly indicate the amounts spent on the given units in the previous three years and the amounts planned for the units in the following three years. This will allow for a coherent review of the total improvement planned for all units.

Family Housing, Defense Agencies

The conferees have agreed to the appropriation of $17,437,000 for Family housing, Defense Agencies, instead of $17,291,000 as proposed by the House and $19,300,000 as proposed by the Senate. The amount of $707,000 is appropriated for construction and $16,730,000 is appropriated for operation and maintenance. The conferees have agreed to the following additions to the amounts and line items as proposed by the House:

Classified Location—NSA:	
6 family housing units	+$60,000
Maintenance	+86,000
Total	+146,000

The conferees agreed to fund all other items in conference at the level proposed by the House, as shown below:

Operations:	
Furnishings	$1,800,000
Miscellaneous	470,000
Leasing	13,730,000

General Provisions

Section 120.—The conferees agreed to amend the House provision to change the construction floor to $10,000,000 for projects requiring U.S. contracts for installed equipment in NATO and Japan for countries not meeting a 3% increase in defense spending in 1983. The amended section reads as follows:

"Sec. 120. None of the funds appropriated in this Act may be obligated for contracts estimated by the Government to exceed $10,000,000 for military construction projects to be accomplished in Japan or in any NATO member country if that country has not increased its defense spending by at least 3 per centum in calendar year 1983, as certified by the Secretary of Defense, unless such contracts require that all installed equipment utilized in such projects have been manufactured in the United States."

Section 121.—The conferees agreed to retain the House provision restricting A&E contracts exceeding $1,000,000 in NATO countries and Japan not meeting a 3% defense increase in 1983 to U.S. companies or joint ventures with U.S. companies.

Section 122.—The conferees agreed to delete the House Section 122 restricting the use of funds for the master restationing plan in Germany. The recommendations on the master restationing plan are discussed under the Army section earlier in this conference report.

Section 123.—The conferees agreed to amend Section 123 as proposed by the Senate. The section as amended and renumbered, reads as follows:

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