
The Waterfront Scoping Summary
City of Redondo Beach
Attachment H

Agency Comment Letters



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



*Flex your power!
Be energy efficient!*

July 21, 2014

Ms. Katie Owston
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Re: The Waterfront

Notice of Preparation of a Draft EIR
SCH #2014061071, IGR No. 140646FL
Vic. SR-1/PM 19.5

Dear Ms. Owston:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. Based on the Initial Study (IS), the proposed project is to revitalize approximately 35.6 acres of land and water: mainly proposed demolition of approximately 221,347 square feet of existing structures, demolition/renovation of the existing parking structure, and construction/renovation of up to approximately 523,732 square feet for retail, restaurant, creative office, specialty cinema, a market hall, and a boutique hotel.

As mentioned in the IS, the proposed project would generate new vehicle trips and traffic increases would occur; therefore, to assist Caltrans in our effort to evaluate the impacts of this project on State Transportation Facilities, please forward a copy of the environmental document once it's prepared. Currently, Caltrans has the following comments:

Please evaluate potential transportation impacts to State Route 1 (Pacific Coast Highway), SR-405, and SR-110, associated with this project and from future growth in the surrounding area in a Traffic Impact Analysis (TIA). Please refer traffic engineers to follow the *Caltrans Guide for the Preparation of Traffic Impacts Studies*, it is accessible online at:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are elements of what Caltrans generally expects in a traffic impact study:

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.
- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project under consideration, b) cumulative traffic from all specific approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Scenarios involving different assumptions on development and growth should be considered.

- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area.
- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring.
- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Any traffic mitigation fees may be assessed proportionally with the additional traffic generated by the project. (See Caltrans' Traffic Impact Study Guide for a suggested formula).

Although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. The CMP does not adequately address cumulative transportation impacts and does not analyze for safety, weaving problems, or delay. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements and criteria of significance to be used in the traffic impact analysis.

Generally, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulatively significant impact, as it may contribute to the extension of the congestion period and deterioration of safety.

As a reminder, various permits may be needed for this project, such as but not limit to – oversize vehicle permits, transportation permits (any wide loads or unusual loads), encroachment permits (any work performed within the State Right-of-Way), etc. – For information on the Permit process, please contact Caltrans District 7 Office of Permit at (213) 897-3631.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of the project's need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

If you have any questions or concerns, please feel free to contact me at (213) 897 – 9140 or project coordinator Frances Lee at (213) 897 – 0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

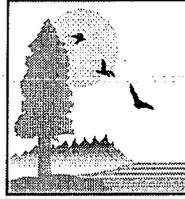


DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans District 7

cc: Scott Morgan, State Clearinghouse

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



Established in 1938

JENNIFER LUCCHESI, *Executive Officer*
(916) 574-1800 Fax (916) 574-1810
California Relay Service TDD Phone 1-800-735-2929
from Voice Phone 1-800-735-2922

Contact Phone: (916) 574-1890
Contact FAX: (916) 574-1885

July 18, 2014

File Ref: SCH # 2014061071

Katie Owston
Project Planner
Community Development Department
415 Diamond Street
Redondo Beach, CA 90277

**Subject: Notice of Preparation (NOP) for an Environmental Impact Report (EIR)
for the Redondo Beach Waterfront Project, Los Angeles County**

Dear Ms. Owston:

The California State Lands Commission (CSLC) staff has reviewed the subject NOP for an EIR for the Redondo Beach Waterfront Project (Project), which is being prepared by the City of Redondo Beach (City). The City, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The CSLC is a trustee agency for projects that could directly or indirectly affect sovereign lands, and their accompanying Public Trust resources or uses. In addition, the CSLC may act as a responsible agency.

CSLC Jurisdiction and Public Trust Lands

The CSLC has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The CSLC also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6301, 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the Common Law Public Trust.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line, except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court. On navigable non-tidal

waterways, including lakes, the State holds fee ownership of the bed of the waterway landward to the ordinary low water mark and a Public Trust easement landward to the ordinary high water mark, except where the boundary has been fixed by agreement or a court. Such boundaries may not be readily apparent from present day site inspections.

A portion of the proposed Project will involve lands that have been legislatively granted to the City, pursuant to Chapter 57, Statutes of 1915 and as amended by Chapter 1555, Statutes of 1971. The City, as trustee of these sovereign lands, must ensure that the specific uses proposed on lands impressed with the public trust are consistent with the provisions of the relevant granting statutes and the common law Public Trust Doctrine. Future approvals from the Commission may be necessary as the project proceeds. Please contact Reid Boggiano, Public Land Management Specialist (see contact information below) for more information.

Project Description

The proposed Project, located in the City's Coastal Zone south of Portofino Way, North of Torrance Boulevard, and west of Harbor Drive/Catalina Avenue, would revitalize approximately 35.6 acres of land and water by redeveloping and expanding local and visitor serving commercial uses, enhancing public access and recreational opportunities and facilities, and improving the aging support infrastructure and parking facilities. The main components include proposed demolition of approximately 221,347 square feet of existing structures, demolition/renovation of the existing pier parking structure, and construction/renovation of up to approximately 523,732 square feet (289,906 square feet net new development) to include retail, restaurant, creative office, specialty cinema, a market hall, and a boutique hotel. The Project includes public recreation enhancements such as a new boat launch ramp, improvements to Seaside Lagoon, new parking facilities, and pedestrian and bicycle pathways. In addition, a new pedestrian bridge would be constructed that spans the approximately 250-foot Basin 3 entrance.

Environmental Review

CSLC staff requests that the following potential impacts be analyzed in the EIR.

General Comments

1. **Project Description**: Page 12 of the NOP states that "Construction activities associated with project elements such as the boat launch ramp, Seaside Lagoon, and pedestrian bridge, may include dredging, filling, rock placement, in-water concrete placement, sheetpile installation, pile driving, shoreline protection and other above and below water activities." A thorough and complete Project Description should be included in the EIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or deposited, seasonal work windows, locations for

material disposal, etc.), as well as the details of the timing and length of activities. Thorough descriptions of all Project phases will make for a more robust analysis of the work that may be performed, and minimize the potential for subsequent environmental analysis to be required.

Biological Resources

2. Consultation: The EIR should include a discussion of consultation with the Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), including any recommended mitigation measures and potentially required permits identified by these agencies for any special-status plant or wildlife species that may occur in the Project area.
3. Construction Noise: The EIR should also evaluate noise and vibration impacts on fish and birds from construction, flood control activities in the water, on the levees, and for land-side supporting structures. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Cultural Resources

4. Submerged Resources: The EIR should evaluate potential impacts to submerged cultural resources in the Project area. The CSLC maintains a shipwrecks database that can assist with this analysis. CSLC staff requests that the City contact Assistant Chief Counsel Pam Griggs (see contact information below) to obtain shipwrecks data from the database and CSLC records for the Project site. The database includes known and potential vessels located on the State's tide and submerged lands; however, the locations of many shipwrecks remain unknown. Please note that any submerged archaeological site or submerged historic resource that has remained in State waters for more than 50 years is presumed to be significant.
5. Title to Resources: The City should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the CSLC. CSLC staff requests that the City consult with Assistant Chief Counsel Pam Griggs (see contact information below), should any cultural resources on state lands be discovered during construction of the proposed Project.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and potential responsible agency, we request that you consider our comments prior to certification of the EIR. Please send copies of future Project-related documents, including electronic copies of the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination (NOD), CEQA Findings and, if applicable, Statement of Overriding Considerations when they become available, and refer questions concerning environmental review to Cynthia Herzog, Senior Environmental

Scientist, at (916) 574-1310 or via e-mail at Cynthia.Herzog@slc.ca.gov. For questions concerning archaeological or historic resources under CSLC jurisdiction, please contact Assistant Chief Counsel Pam Griggs at (916) 574-1854 or via email at Pamela.Griggs@slc.ca.gov. For questions concerning CSLC jurisdiction, please contact Reid Boggiano, in the Granted Public Trust Lands Program, at (916) 574-0450, or via email at Reid.Boggiano@slc.ca.gov.

Sincerely,



Cy R. Oggins, Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
Reid Boggiano, Granted Lands, CSLC
Cynthia Herzog, DEPM, CSLC
Kathryn Colson, Legal, CSLC



City of Hermosa Beach

Community Development Department (310)318-0242
Civic Center, 1315 Valley Drive, Hermosa Beach, California 90254-3884

July 17, 2014

Katie Owston, Project Planner
City of Redondo Beach
415 Diamond Street
Redondo Beach, California 90277
(katie.owston@redondo.org)

Subject: Response to Notice of Preparation of an EIR for Waterfront Project

Dear Ms. Owston:

We have reviewed the NOP for the Waterfront Project and request the following potential impacts as related to all phases of the proposed Project be addressed in the EIR:

1. Potential effects on the harbor, breakwater, shoreline, or seafloor with the potential to affect accretion or erosion relating to the coastline or beach, wave action, or water quality.
2. Potential effects on the types, mix, square footage, time of use, circulation, parking and other land use components of the project and nearby areas catalyzed by the project.
3. Potential displacement and relocation of various populations currently using the harbor area and pier to other locales including Hermosa Beach.
4. Potential impacts to Hermosa Beach's commercial/tourism sectors, particularly in the downtown area, including effects on vacancy rates, local and regional land use, tourism or visitation patterns, etc., which may lead to deteriorated or blighted conditions.
5. Potential alterations or increases in traffic and use of fossil-fuels during construction or operation that increase greenhouse gases.
6. Effects on views from public viewpoints in Hermosa Beach.
7. Effects on recreational resources in Hermosa Beach, such as The Strand, beach, Plaza and coast generally.
8. Effects relating to traffic, congestion or circulation patterns affecting streets, roads, bikeways or circulation within and proximate to Hermosa Beach.
9. Impacts on the ability to provide the mutual fire, police and ambulance aid at the current levels.
10. The relationship and consistency of the above with coastal goals and policies in the City of Hermosa Beach Coastal Land Use Plan (title Local Coastal Plan).
11. Cumulative impacts relating to the above issue areas.

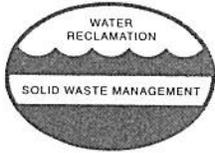
Based on our understanding of the project at this time, we agree that the City of Hermosa Beach is not a responsible agency.

The project contact will be Pamela Townsend, Senior Planner, City of Hermosa Beach, 1315 Valley Drive, Hermosa Beach, CA 90254 (ptownsend@hermosabch.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Robertson', written over a printed name and title.

Ken Robertson
Community Development



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

GRACE ROBINSON HYDE
Chief Engineer and General Manager

July 16, 2014

Ref File No.: 3012036

Ms. Katie Owston, Project Planner
Community Development Department
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Dear Ms. Owston:

The Waterfront Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on June 19, 2014. The proposed development is located within the jurisdictional boundaries of the South Bay Cities Sanitation District. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Herondo Trunk Sewer Section 1, located in Herondo Street west of Francisca Avenue. This 14.06-inch diameter lined trunk sewer has a design capacity of 2.1 million gallons per day (mgd) and conveyed a peak flow of 1.0 mgd when last measured in 2010.
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.
3. The expected increase in average wastewater flow from the project site is 22,282 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the

appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

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

Very truly yours,

Grace Robinson Hyde



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: M. Tremblay
J. Ganz



Metro

July 16, 2014

Katie Owston
Project Planner
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

RE: Redondo Beach Waterfront Revitalization Project

Dear Ms. Owston,

Thank you for the opportunity to comment on the proposed Redondo Beach Waterfront Revitalization Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro bus line 130 operates on North Catalina Avenue, proximate to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188). Other municipal bus may also be impacted and should be included in construction outreach efforts.

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system. Please note that the nearby Pacific Coast Highway (PCH) is a State Highway, SR 1.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

A handwritten signature in black ink, appearing to read "Marie Sullivan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Marie Sullivan
Development Review Coordinator, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

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

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



July 7, 2014

Katie Owston, Project Planner
CITY OF REDONDO BEACH
415 Diamond Beach
Redondo Beach, CA 90277

RE: SCH#2014061071 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"The Waterfront"** located in the City of Redondo Beach; Los Angeles County, California

Dear Ms. Owston:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). This area is known to local Tribes to be culturally sensitive.

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant

to California Government Code Section 6254.10.

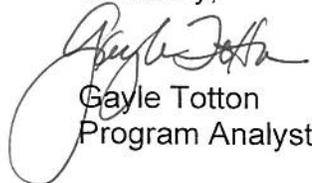
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed activity might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead, lead agencies should include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Gayle Totton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County
July 7, 2014**

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
(310) 570-6567

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
Gabrielino Tongva
P.O. Box 693
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 483-3564 Cell
(626) 286-1262 Fax

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
Gabrielino Tongva
P.O. Box 86908
Los Angeles , CA 90086
sgoad@gabrielino-tongva.com
(951) 845-0443

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
Gabrielino Tongva
P.O. Box 490
Bellflower , CA 90707
gtongva@verizon.net
(562) 761-6417 Voice/Fax

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
Gabrielino
P.O. Box 180
Bonsall , CA 92003
bacuna1@gabrielinotribe.org
(619) 294-6660 Office
(310) 428-5690 Cell
(760) 636-0854 Fax

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
Gabrielino
P.O. Box 180
Bonsall , CA 92003
palmsprings9@yahoo.com
(626) 676-1184 Cell
(760) 636-0854 Fax

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
Gabrielino
P.O. Box 393
Covina , CA 91723
gabrielenoindians@yahoo.
(626) 926-4131

Gabrielino-Tongva Tribe
Conrad Acuna,
Gabrielino
P.O. Box 180
Bonsall , CA 92003
(760) 636-0854 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed The Waterfront Project; located in the City of Redondo Beach; Los Angeles County, California for which a Sacred Lands file search and Native American Contacts list were requested.

**Native American Contacts
Los Angeles County
July 7, 2014**

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
(909) 262-9351

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed The Waterfront Project; located in the City of Redondo Beach; Los Angeles County, California for which a Sacred Lands file search and Native American Contacts list were requested.



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

South Coast
AQMD



June 26, 2014

Katie Owston
Project Planner
Community Development Department
415 Diamond Street
Redondo Beach, CA 90277

**Notice of Preparation of a CEQA Document for the
The Waterfront Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

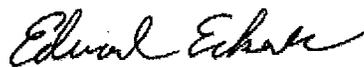
- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Data Sources

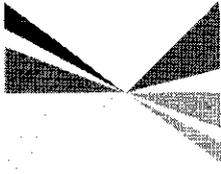
SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources



ASSOCIATION OF GOVERNMENTS

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Alan Wapner, San Bernardino
Associated Governments

July 1, 2014

Ms. Katie Owston, Project Planner
Community Development Department
City of Redondo Beach
415 Diamond Street
Redondo Beach, California 90277
Telephone: (310) 318-0637, Ext. x1-2895
E-mail: katie.owston@redondo.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Waterfront Project [SCAG NO. IGR8089]

Dear Ms. Owston,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Waterfront Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Waterfront Project. The proposed project would include the construction and renovation of up to approximately 523,732 square feet (289,906 square feet of net new development) to include retail, restaurant, creative office, specialty cinema, a market hall, and a boutique hotel in the City of Redondo Beach's Coastal Zone, Los Angeles County, California.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler,
Manager, Compliance and Performance Assessment

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT
ENVIRONMENTAL IMPACT REPORT FOR THE WATERFRONT PROJECT
[SCAG NO. IGR8089]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS Goals		
Goal		Analysis
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
etc.		etc.

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

Regional Growth Forecasts

The Draft Environmental Impact Report for the proposed project should reflect the most recently adopted SCAG forecasts. At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

Forecast	Adopted SCAG Region Wide Forecasts		Adopted City of Redondo Beach Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	69,700	73,000
Households	6,458,000	7,325,000	30,700	32,000
Employment	8,414,000	9,441,000	30,600	31,600

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

June 19, 2014



To: Reviewing Agencies

Re: The Waterfront
SCH# 2014061071

Attached for your review and comment is the Notice of Preparation (NOP) for the The Waterfront draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Katie Owston
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2014061071
Project Title The Waterfront
Lead Agency Redondo Beach, City of

Type NOP Notice of Preparation
Description The project would revitalize a portion of the Harbor by redeveloping and expanding commercial uses, enhancing public access and recreational facilities, and improving the aging infrastructure and parking while enhancing site connectivity, public access and public views. The main components are demolition of ~221,347 sf of existing structures; demolition of a parking structure; construction/renovation of up to ~523,732 sf (289,906 sf net new development) to include retail, restaurant, creative office, specialty cinema, and a boutique hotel; and new small boat launch ramp, improvements to Seaside Lagoon, and pedestrian and bicycle paths. Site connectively elements include a new pedestrian bridge across the Redondo Beach Marina Basin 3 entrance and the reconnection of Pacific Ave.

Lead Agency Contact

Name Katie Owston
Agency City of Redondo Beach
Phone 310 318-0637 x1-2895 **Fax**
email
Address 415 Diamond Street
City Redondo Beach **State** CA **Zip** 90277

Project Location

County Los Angeles
City Redondo Beach
Region
Cross Streets Portofino Way, Torrance Boulevard, Harbor Drive/Pacific Avenue
Lat / Long 33° 50' 28.5" N / 118° 23' 30.2" W
Parcel No. Multiple
Township 4S **Range** 14W **Section** 07 **Base**

Proximity to:

Highways SR-1 (Pacific Coast Hwy)
Airports No
Railways No
Waterways King Harbor and Pacific Ocean
Schools Multiple
Land Use CR Commercial Rec (subarea 1,2,3); P-PRO Parks, Rec & Open Space/CC Coastal Commercial; P Public or Institutional

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

Reviewing Agencies Resources Agency; Department of Boating and Waterways; California Coastal Commission; Department of Conservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 3

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Document Details Report
State Clearinghouse Data Base**

Date Received 06/19/2014 **Start of Review** 06/19/2014 **End of Review** 07/18/2014

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Resources Agency
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California Energy Commission
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Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCCB)

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RWQCCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCCB 3
Central Coast Region (3)

RWQCCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCCB 5S
Central Valley Region (5)

RWQCCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCCB 6
Lahontan Region (6)

RWQCCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCCB 7
Colorado River Basin Region (7)

RWQCCB 8
Santa Ana Region (8)

RWQCCB 9
San Diego Region (9)

Other

Conservancy