

Redondo Beach Waterfront Draft EIR - Hermosa Beach comment letter

Kim Chafin <kchafin@hermosabch.org>

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To:Katie Owston <Katie.Owston@redondo.org>;

Cc:Ken Robertson <krobertson@hermosabch.org>;

 1 attachment

RB Waterfront DEIR - Hermosa Beach comment letter.pdf;

Good afternoon, Katie!

Attached is the City of Hermosa Beach comment letter regarding the Draft EIR for the Redondo Beach Waterfront project.

Thanks, Katie!

Kim Chafin, AICP, LEED-AP

Senior Planner, Community Development Department

City of Hermosa Beach

(310) 318-0240

AL001-1



City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, CA 90254-3885 Tel: (310) 318-0242

January 19, 2016

Ms. Katie Owston
Project Planner for the Waterfront
Community Development Department
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277
Katie.owston@redondo.org

Dear Ms Owston:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Waterfront Project in Redondo Beach. The City of Hermosa Beach remains keenly interested in the planning and review process for this project due to its relatively large size, its complex mix of multiple uses and its proximity to Hermosa Beach. Our review and comments on the Draft EIR focus on environmental issues that have the potential to impact the residents and resources of Hermosa Beach or of the South Bay region. Generally, we consider the Draft EIR to provide in-depth analysis of most environmental issues. However, there are areas that we believe warrant further analysis. These include:

- Potential impacts related to offshore geology, including offshore subsidence and submarine landslides;
- Water quality impacts, especially the feasibility of avoiding significant contributions to the degradation of water quality in the impaired Santa Monica Bay over the life of the project;
- Increased local demand for affordable housing (and associated physical impacts) resulting from the type and number of new jobs generated by proposed land uses;
- A significant increase in vehicle miles travelled (VMT) as a result of proposed uses, including employee-generating uses that will increase the already high number of commuter trips in the South Bay Region;
- The uncertain feasibility of resolving the shortfall in parking demand through methods conceptually identified as mitigation measures;
- Consideration of all relevant cumulative projects that may have impacts during the same time frame as the Waterfront project.

To assist with this last consideration we have attached a current list of cumulative projects in Hermosa Beach and their expected timelines.

AL001-1
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Among our major concerns is the Draft EIR's absence of realistic analysis and consideration of a reasonably foreseeable land use at the AES site as part of the cumulative impacts assessment. Because of the scale and potential complexity of future development at this site, along with its proximity to the Waterfront project, the AES site is likely the most important of all projects in the cumulative project analysis. It is unrealistic of the Waterfront EIR to depict future conditions without integrating a realistic assumption or realistic scenarios for the AES site into its analysis. The combined effects of the Waterfront project and the AES site together, both of which can be reasonably assumed to be cumulatively linked geographically as well as temporally (it is not unreasonable to assume that within the next decade both sites will undergo development to levels of intensity significantly higher than exist today) are potentially great enough to change the character of the South Bay in ways that are not foreseeable without the benefit of a combined analysis. The project's combined effects will almost certainly impact Hermosa Beach directly and indirectly in multiple ways.

AL001-2

Ideally we strongly believe that it is in the best interests of Redondo Beach and of all of her neighboring cities and the South Bay region as a whole to consider the future of these two unique and unusually large sites through the perspective of a parallel if not unified, overarching planning process and we are willing to be an active partner in that process. That being said, if such a process is not possible, the Draft EIR's cumulative impacts assessment should include a thorough analysis of realistic scenarios of potential development and how the AES site will be developed and integrated into the Waterfront project.

Specific comments on environmental issues and sections of the Draft EIR are provided below.

Air Quality

Please identify VMT assumptions used in estimating operational emissions. Are VMT commute distances for future employees based on factually supported assumptions related to the availability of local housing that matches the projected income levels of future service industry employees?

AL001-3

Biology

The "soft start" to pile driving activities called for in MM BIO-1, intended to induce marine mammals to relocate, would seem to qualify as harassment under the Marine Mammal Act.

AL001-4

MM BIO-2 is self-contradictory, or ambiguous at the very least, in requiring in its first sentence that construction under Horseshoe Pier that could disturb the sandy beach be scheduled outside the grunion spawning season, then goes on to undo that requirement by prescribing procedures to be implemented "if construction overlaps the grunion spawning season".

AL001-5

The Draft EIR should discuss the consistency of Condition of Approval BIO-3 with the Marine Mammal Act and its potential to result in adverse environmental impacts. This

AL001-6

condition does not appear to be intended to avoid or mitigate impacts to pinnipeds, but rather to manage their impacts on the proposed project's uses. It may adversely affect wildlife, especially with such implementing actions as "reduce or eliminate existing colonial haul-outs inside King Harbor".

Geology and Soils

The Draft EIR should address the potential for the project to induce offshore subsidence as well as the potential for the proposed new uses and adjacent areas to be subject to the effects of offshore subsidence. The Draft EIR limits its discussion of subsidence potential to onshore subsidence, despite the history of subsidence in the immediate vicinity offshore. According to prior studies, the King Harbor Breakwater settled approximately five feet between 1955 and 1985. Design of the breakwater and existing harbor facilities apparently did not take into account evidence of subsidence, although adverse effects of regional subsidence and local differential settlement on the long-term performance of the breakwater and inner harbor structures were predictable, based on data existing at the time of their construction (Elwany et al. 2006)¹. Five feet of settlement of the breakwater with no evidence of similar amounts of settlement and attendant structural damage throughout the adjacent coastal areas suggests localized settlement due to improper construction rather than regional subsidence.

AL001-7

The Draft EIR should discuss the potential for offshore landslides to be induced by project construction. The report limits its discussion of landslide potential to onshore geologic conditions. As indicated in the Hydrology and Water Quality section of the Draft EIR (page 3.8-24), underwater landslides are not unknown in the Santa Monica Bay and the presence of underlying unconsolidated, ancestral lagoonal sediments and evidence of offshore slumping in the Redondo Submarine Canyon suggest that landslide potential exists in the project vicinity offshore. Proposed uses, including the new 420-foot breakwater and the two new piers at the entrance to Basin 3, should be addressed in light of potential offshore subsidence and landslide potential. The Draft EIR should also address any potential risk of inducing offshore landslides (and/or subsidence) due to the vibration associated with pile-driving cited as a method of mitigating the liquefaction hazard that exists throughout much of the site (Draft EIR, page 3.5-33).

Greenhouse Gas Emissions

Please identify VMT assumptions for home-to-work commutes of future employees at the site.

AL001-8

Hydrology & Water Quality

The Draft EIR asserts that the project (both construction and operation) "would not further contribute to degradation of water quality" (Draft EIR, Page 3.8-1). This claim seems unrealistic, given the scale and complexity of the project and its location at the

¹ Elwany, H.R., Dill, J.J., and Marshall, N. 2006. Subsidence of King Harbor Breakwater at Redondo Beach. Proceedings of International Conference on Coastal Engineering. ASCE. 8 pp. King Harbor, http://coastalenvironments.com/pdf/11_kingharborbreakwater_icce06.pdf. Site accessed January 11, 2016.

AL001-9

edge of an impaired water body. The impacts assessment appears to rely on the assumption that compliance with LID and MS4 requirements, and implementation of BMPs and a storm water pollution prevention plan (SWPPP) during construction, equate to “no degradation of water quality”. The Santa Monica Bay’s long-standing impaired status indicates that these existing regulations and management measures, although they reduce adverse effects, are not sufficient to prevent water quality degradation. The claim that the project over its lifetime will not contribute to water quality degradation is especially questionable given the ‘zero trash’ threshold established by the offshore debris TMDL for the Santa Monica Bay Watershed Management Area (Draft EIR, page 3.8-9, penultimate paragraph). A more realistic impacts assessment would be one that identifies the unavoidability of adverse water quality effects of such a project, while also committing to the highest level of avoidance and mitigation feasible.

The Draft EIR should acknowledge that much of the proposed square footage along the waterfront will be devoted to restaurants, a use that is notorious for generating pollutants in the form of nuisance runoff associated with wash down requirements. The text cites infiltration as “the preferred method” for managing runoff generated onsite, but notes that “future geotechnical studies would be required to determine if this is feasible” (Draft EIR, Page 3.8-59). Both feasibility of mitigation methods and performance standards must be established in order to assert that impacts are effectively mitigated. Other pollution management measures cited in the text, such as compliance with the City’s Green Street Policy and a net reduction in impervious surfaces, will assuredly lead to reductions in runoff and pollutants discharging into the Pacific Ocean (Draft EIR, Page 3.8-59), but they do not demonstrably reduce impacts to a less than significant level or achieve “no degradation of water quality”. A meaningful performance standard would be one that ensures that all storm water and low-flow volumes generated onsite are captured in onsite filtration systems and effectively treated to clean water standards.

AL001-9
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As stated on Page 3.8-59, the project would necessitate relocation of two storm drains that cross the northern portion of the site and discharge urban runoff from areas east of the site into the ocean. Although this discharge is not generated on the project site, and therefore is not a project impact, the relocation of these storm drains presents a possible opportunity to provide onsite filtration systems for this discharge, and thus eliminate a significant source of ongoing impacts from within Redondo Beach into the Bay. Integration of such an enhancement into the Waterfront plan is a potential opportunity to mitigate the project’s own residual water quality impacts, as well as provide a service to the public in general and to communities along Santa Monica Bay in particular.

Noise

It is not clear from the Draft EIR if modelled roadway noise increases shown in Table 3.10-11 take into account the higher noise generated by trucks in the project’s construction traffic mix (especially since trucks are converted to passenger car equivalents when estimating traffic volume). Please clarify that truck noise is considered in the projections.

AL001-10

Please add Herondo Street and Artesia Boulevard to both Tables 3.10-11 and 3.10-12, to disclose projected roadway noise increases along these segments.

AL001-11

Please consider the project's potential overlap with cumulative projects in Hermosa Beach (see attached project list) and include any potential cumulative impacts in the projected roadway noise levels shown in Table 3.10-12. Please note that several of the projects in Hermosa Beach affect the same roadway segments as those affected by the Waterfront project's construction traffic, and some also are expected to generate construction phase truck traffic using the same haul routes.

AL001-12

Population & Housing

According to the City's Initial Study, the topics of Population and Housing were eliminated from further discussion in the EIR, based on responses to the questions of the Initial Study checklist, which in turn are based on Appendix G of the State CEQA Guidelines. However, it seems reasonable that there will be indirect impacts to population and housing that are not addressed in the Initial Study questions or in the Draft EIR. The Project Description indicates that the project will generate jobs for approximately 1,438 new employees (Draft EIR, Page 2-42). Given the mix of proposed uses, most of these new jobs are likely to be in the retail, restaurant and hospitality service sectors, and therefore in salary ranges well below the \$89,119 median annual income of the local community (Draft EIR, Page 2-3). The potential disparity between the nature of jobs created and the economics of local housing suggests that the Waterfront project will very likely increase the local demand for affordable housing. Such an impact is likely to have secondary, indirect environmental effects resulting either in development of new affordable housing to accommodate the demand, or increased commuter trips if the demand for affordable housing is not met locally. Increased commuter trips would in turn generate a host of tertiary impacts associated with increased VMT locally and in the region, including traffic, air quality, greenhouse gas emissions and roadway noise impacts. For this reason, a jobs/housing mismatch is an impact of especially significant consequence, generating a series of indirect adverse environmental effects that are not only local but can also be regionally significant.

AL001-13

Traffic and Transportation

According to the Project Description, the mix of retail, restaurant and office uses has not been finalized and is subject to change between now and project completion. It is not clear whether the trip generation model applies a land use mix assumption that provides a worst-case scenario in terms of trip generation. The land use mix also affects the estimated parking demand. Both trip generation and parking demand could, conceivably increase or decrease, between project approval (and certification of the Final EIR) and project completion, unless the analysis applies worst case assumptions.

AL001-14

For the intersections impacted by the project, the Draft EIR does not identify the LOS and VC after mitigation to demonstrate the effectiveness of mitigation (Tables 3.13-14 and 3.13-28). This is important information and should be included.

AL001-15

The Draft EIR indicates that the applicant would provide fair share funding for some of the modifications called for in MM TRA-1 through TRA-6. But it is not clear in all cases where the rest of the funding will come from, and whether sufficient funding is assured to complete the improvements at the time the project's impacts must be mitigated. Please indicate the sources of funds for all improvements and the timing of their implementation.

AL001-16

All of the project impacts identified in Table 3.13-14 occur at the PM peak, suggesting they are associated with commuter trips (employee generated, rather than patrons and customers of proposed businesses). A mixed use alternative that includes residential use targeted to the income level of future employees would be a potential means of reducing this impact and related VMT and emissions.

AL001-17

Please identify projected traffic conditions with the project for peak summer weekend periods.

AL001-18

The Draft EIR identifies up to 110 truck trips per day during the project's extensive construction phase. Many of these trips would access the site through Hermosa Beach, travelling on Artesia Boulevard and traversing the city on Pacific Coast Highway and then travelling down Herondo Street (and returning along the same route). In addition to identifying passenger car equivalents (PCE) and adding them to the trip generation mix, the Draft EIR should consider the cumulative effect of these truck trips in concert with other truck generating projects that may overlap with this project's construction phase timeline. Please see the attached list of anticipated projects in Hermosa Beach.

AL001-19

Parking

The project's ability to meet its parking demand should be made clearer in the Draft EIR. The impact assessment identifies a significant impact and relies on development of a Parking Management Plan to fully mitigate the impact. But the discussion does not establish that mitigation is feasible and fully achievable using the methods identified in Mitigation Measure TRA-7. The Draft EIR should evaluate whether or not the parking shortfall identified is within the range that can be addressed through an efficient shared parking program, with reasonable, well-supported expectations. The same is true of the other methods mentioned: tandem and valet parking, and satellite parking. The latter may have its own physical impacts, depending on the site(s). The physical effects of creating and operating one or more satellite parking sites would need to be addressed in the EIR if this method is considered to be part of the project. The final method identified, "Promote Alternative Transportation Modes for Employees and Patrons" is expressed in language that is not mandatory ("encourages" rather than requires) and so cannot be relied on for mitigation.

AL001-20

Mitigation Measure TRA-7 identifies two objectives, which provide the basis of potential performance standards. It should be pointed out that the first objective, "Provide sufficient parking on-site to meet the parking demands generated by the proposed project" would disqualify satellite parking as a means of mitigation. The second objective, to "support trip and emission reduction goals" is consistent with a project alternative that provides affordable housing onsite with a concurrent reduction in low-income employment generating uses, to ameliorate the project's jobs/housing imbalance and reduce commuter trips (see comments on Population & Housing, above).

AL001-21

Alternatives Discussion

The effectiveness of the Draft EIR's Alternatives discussion is hampered by the alternatives selection process. In defining the purpose of the alternatives discussion, CEQA states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects" (CEQA Guidelines, 15126.6 (b)). While some of the alternatives selected can be said to reduce impacts, they do not seem to have been selected explicitly with that focus in mind. To fulfill CEQA's intent, the alternatives selection process should begin with a clear statement of those significant impacts identified in the Draft EIR that cannot be mitigated to a level below significance through mitigation measures provided. The list of alternatives analyzed should be developed in direct response to those impacts, with the goal of identifying modifications to the proposed project that successfully avoid or substantially lessen them. The Draft EIR does not appear to perform this exercise, but instead selects a range of project alternatives that seem to relate more to planning considerations than to the goal of directly avoiding identified environmental impacts.

AL001-22

The Draft EIR identifies six significant and unavoidable impacts. These impacts, along with others that may be identified as a result of refinements to the EIR analysis in response to these and other comments, should be the focus of the alternatives development and selection process, with the goal of identifying feasible solutions to the project's otherwise unmitigated significant adverse effects.

Thank you once again for the opportunity to review the Draft EIR. Please contact me if you have any questions about these comments or would like to discuss concerns related to the environmental review and approval process for this project.

AL001-23

Sincerely yours,



Ken Robertson
Director of Community Development

- H2O Hotel @ 1429 Hermosa Ave – construction commencing 1st quarter 2016; 11-24-15 City Council report link: <https://hermosabeach.legistar.com/LegislationDetail.aspx?ID=2521469&GUID=C946C473-135F-4C53-BD39-460A28DFC4AB>
<http://www.hermosabch.org/index.aspx?page=358>
- Hermosa Ave Street Improvement Project – construction commencing Jan 2018; see Downtown Core Revitalization Strategy for project description
<http://www.hermosabch.org/index.aspx?page=775>
- OTO hotel @ 11th & Beach Drive: project on hold; see 9-9-14 City Council report for project description
<http://www.hermosabch.org/index.aspx?page=358>
- Transpacific Cable on beach west of 25th St & on beach west of Neptune St – see NOP/IS posted on City website for project description <http://www.hermosabch.org/index.aspx?page=504>
- Skechers @ 30th & PCH: construction commencing Jan 2017 in MB & Sept 2017 in HB; see NOP/IS posted on City website for project description <http://www.hermosabch.org/index.aspx?page=504>
- Pier & Strand Hotel – construction commences January 2018 and ends in 2020; see [provide website link]
- Transpacific Cable – construction (first phase) begins and ends in 3rd quarter of 2016, with subsequent phases scheduled for 2020 and 2025
- Plan Hermosa – Update of City of Hermosa Beach General Plan (in progress); see [provide website link]

Comments

The Waterfront
Draft Environmental Impact Report (Draft EIR)



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Organization (optional): Torrance Transit

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Phone (optional): (310) 387-4939

E-mail (optional): BTallison@TorranceCA.gov

Comments on Draft EIR:

It's the Torrance circle that concerns
Torrance Transit as we currently
use the area to layover 3 buses
at a time, this requires 150ft.

AL002-1

(Please write on the back if you need more room)

Please drop the completed form into the box marked "COMMENTS" or mail to:
 Katie Owston, Project Planner
 City of Redondo Beach
 415 Diamond Street
 Redondo Beach, California 90277

Comments may also be submitted via email to katie.owston@redondo.org.
All comments must be received no later than 5:30 p.m. on January 19, 2016.