# CITY OF REDONDO BEACH
# APPLICATION FOR APPEAL
# TO THE CITY COUNCIL

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RE: 2016-06-HC-001 and 2016-06-CDP-004 Waterfront Project
(case number and name)

Address/Location of Subject Property Redondo Beach Waterfront (see attachment)
(if applicable)

Decision-making body that made the decision which is the subject of the appeal:

- ☐ Planning Commission
- ☑ Harbor Commission
- ☐ Preservation Commission
- ☐ Planning Director
- ☐ Board of Appeals/Uniform Code

Date of decision: 9 Aug 16 Appealing: ☑ Approval ☐ Denial

Name of Appellant James A. Light and others (see attachment), WAYNE CRAIG
(type or print)

Address of Appellant 602B S Broadway, Redondo Beach, CA 90277 (see attachment) 506 S BROADWAY #A REDONDO BEACH CA 90277

Telephone Number of Appellant 310-989-3332, 310-897-1756

Email Address of Appellant jim light1@verizon.net, WAYNE@WAYNECRAIGHOMES.COM

Signature

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**Appeal Fee Paid $**_____ **Date**_____ **Received by**_____

**Notice to:** City Council _____ City Manager _____ City Attorney _____ Planning Department _____ Harbor Department _____

Other_____

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**This appeal is made pursuant to the following Redondo Beach Municipal Code Section(s) (see page 3 for a partial listing of City's municipal code appeal provisions):**
§ 2-9.712(b), § 10-1.906; § 10-2.2502(g); § 10-2.2506(g); § 10-3.901; § 10-4.601; § 10-5.2502(g); § 10-5.2506(g); and/or § 10-5.2222; and others as included in attachements.

## Ground(s) for Appeal:

**Please specify the grounds for this appeal. Where an approval /denial involves multiple entitlements/actions, please specify which entitlements/actions are contested in this appeal (e.g. Conditional Use Permit) and the specific grounds for contesting each entitlement/action.**

**Appellant is responsible for reviewing and complying with the relevant appeal procedures contained in the City's municipal code or state law, which may contain additional substantive and/or procedural requirements depending upon the nature of the appeal. It may be necessary for appellant to supplement this form with additional pages/information to fulfill these requirements. Issues not raised here will not be considered by City Council.**

Appellants challenge the validity, under State and City law, of the decisions made by the Redondo Beach Harbor Commission on August 9, 2016, including certification of a final environmental impact report (State Clearinghouse No. 2014061071); adopting facts and findings; approving a water supply assessment; approving a statement of overriding considerations; adopting a mitigation monitoring and reporting program; selecting the staff recommended alternative described in the final EIR; granting a conditional use permit; granting Harbor Commission design review and landscape/irrigation plans; granting a coastal development permit; and granting vesting tentative tract map no. 74207 to allow the construction of a coastal commercial project totalling 523,939 square feet of development, on property located within the Coastal Commercial Zone (CC-1, CC-2, and CC-3) and the Parks, Recreation, and Open Space Zone (P-PRO) located between Portofino Way and Torrance Circle. Appellants also challenge the Harbor Commission's interference with public access to tidelands in violation of Gion v. City of Santa Cruz (1970) 2 Cal.3d 29, as well as other violations of law discussed in the documents attached to this appeal.

Specific Grounds for the appeal are detailed in the attached documents but broadly include the improper assessment of impacts under the California Environmental Quality Act; inadequate and changing description of the project; significant changes to the project that were not examined in the DEIR and still are not adequately defined to the public today; improper application of the California Coastal Act and local requirements; inadequate CEQA review by the Harbor Commission; missing data and unsubstantiated claims in the EIR and in the Statement of Overriding Considerations; insufficient and inaccurate responses to public comments on the DEIR and FEIR; and biased assessment of environmentally superior alternatives.

The following list provides a brief overview of some of the City's Municipal Code Appeals (to City Council) by topic area. This is not intended to be an exhaustive list. Potential appellants are advised to review the Municipal Code Sections to determine applicability of these sections and for additional appeal procedures and appeal content requirements.

For example, California Environmental Quality Act (CEQA) Appeal Procedures are contained within Redondo Beach Municipal Code, Title 10, Chapter 3, Section 10-3.901. CEQA Appeals (1) must be filed within ten [10] days of the decision-making body's action and contain specific information described in 10-3.901, (2) require the appellant to notify the project applicant of the appeal within ten [10] days of the City's action by certified mail (and provide the City a copy of the mail receipt), (3) require appellants to file any additional documentation (such as presentations) with the City Clerk no later than seven [7] days before the public hearing, and (4) require appellant to mail a copy of any additional documentation (such as presentations) to the applicant no later than seven [7] days before the public hearing by certified mail (and provide the City a copy of the mail receipt at the public hearing).

| **Redondo Beach Municipal Code Section** | **General Topic Area for Appeal** |
|---|---|
| RBMC § 3-14.04 | Encroachment permits |
| RBMC § 3-7.1906 | Temporary Street Closure |
| RBMC § 4-11.146 | Oil Wells-Notices to Comply |
| RBMC § 4-15.07 | Registration of Canvassers, Solicitors, itinerant Merchants, Salesmen, and Peddlers |
| RBMC § 4-17.12 | Amusement and Entertainment Permits |
| RBMC § 4-18.11 | Removal of Abandoned, Wrecked, Dismantled, or Inoperative Vehicles from Private or Public Property |
| RBMC § 4-26.09 | Bingo Games for Charitable purposes-Appeals of revocations to the Council |
| RBMC § 5-2.206 | Weeds, Rubbish, and Stagnant Water |
| RBMC § 8-2.10 | Uniform Transient Occupancy Tax |
| RBMC § 10-1.506 | Subdivisions |
| RBMC §§ 10-1.906(a), 10-1.1011 | Subdivisions |
| RBMC § 10-2.2500(g) | Administrative Design Review |
| RBMC § 10-2.2502(g) | Planning Commission Design Review |
| RBMC § 10-2.2504(f) | Zoning Amendments |
| RBMC § 10-2.2505(f) | General Plan and Specific Plan amendments |
| RBMC § 10-2.2506(g) | Conditional Use Permits |
| RBMC § 10-2.2507(f) | Administrative Use Permits |
| RBMC § 10-2.2508(l) | Modifications |
| RBMC § 10-2.2510(g) | Variances |
| RBMC § 10-2.2514(i) | Planned Development Review |
| RBMC § 10-2.2520(f) | Temporary Use Permits |
| RBMC § 10-3.901 | California Environmental Quality Act |
| RBMC § 10-4.601 | Certificate of Appropriateness by the Preservation Commission |
| RBMC § 10-5.2500(g) | Administrative Design Review [Coastal Zone] |
| RBMC § 10-5.2502(g) | Planning Commission Design Review [Coastal Zone] |
| RBMC § 10-5.2504(f) | Zoning Amendments [Coastal Zone] |
| RBMC § 10-5.2505(f) | General Plan and Specific Plan amendments [Coastal Zone] |
| RBMC § 10-5.2506(g) | Conditional Use Permits [Coastal Zone] |
| RBMC § 10-5.2507(f) | Administrative Use Permits [Coastal Zone] |
| RBMC § 10-5.2508(l) | Modifications [Coastal Zone] |
| RBMC § 10-5.2510(g) | Variances [Coastal Zone] |
| RBMC § 10-5.2514(i) | Planned Development Review [Coastal Zone] |
| RBMC § 10-5.2520(f) | Temporary Use Permits [Coastal Zone] |
| RBMC § 10-5.2222 | Coastal Development Permit |
| RBMC § 11-2.10(d) | Public Utilities |
| RBMC § 11-3.608(b) | Cable TV-Liquidated damages |
| RBMC § 1-4.01 | General Appeal Procedures* only applicable if there are no specific appeal procedures provided for the challenged action. |
| RBMC § 2-9.712 | General Appeal Procedures [Harbor Commission]* only applicable if there are no specific appeal procedures provided for the challenged action. |

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## CEQA APPEAL COVERSHEET

## CEQA Appeal Pursuant to Redondo Beach Municipal Code 10-3.901(e)1

**Non-elected decision making body:** Harbor Commission decisions made on 9 Aug 16

**CEQA Documents:** The Waterfront Environmental Impact Report (2014-04-EIR-001), Facts and Findings, Mitigation and Monitoring Program, Statement of Overriding Considerations, Coastal Development Permit, and Vesting Tentative Tract Map 74207

**Concurrent Appeals:** Appeal of Harbor Commission Design Review, Conditional Use Permit, Facts and Findings, Case Numbers 2016-06-HC-01 and 2016-06-CDP-004. Pursuant to RBMC 10-2.2502(g); RBMC 10-5.2506(g); and RBMC 10-5.2222. (see attached "City of Redondo Beach Application For Appeal to the City Council".)

**Name, Address, Email Address, and Phone Number of Appellant:**
James A Light
602 B S Broadway, Redondo Beach, CA 90277
Jim.light1@verizon.net
310-989-3332

Additional Appellants are included in the first attachment.

**Grounds and Issues:**

The Harbor Commission's decision cannot comply with CEQA because the documents certified and approved do not comply with CEQA; the Commission testified they did not have time to read and understand the CEQA documents and public input; the Commission did not adequately assess the impacts because they were more interested in keeping the process moving (several Commissioners stated their interest was to keep the process moving because they assumed it would be appealed to City Council anyway); and that the Commission approved and certified documents before the project and its potentially significant impacts were fully and adequately definitized. Furthermore, the EIR suffers from incomplete, inadequate and unsupported disclosure of physical baseline conditions in area of project and affected by the project; the lack of specificity in, specific performance standards for, and improper deferral of, mitigation measures and violation of Public Resources Code section 21081.6; inadequate alternatives review and biased assessment; violations of the rule of Gion v. City of Santa Cruz (1970) 2 Cal.3d 29, due to new development interfering with historic public access routes to, and historic uses of, the tidelands and submerged harbor waters; and failure to substantiate -- including failure to complete, disclose and execute a binding ALPIF (the contemplated 3P agreement with CenterCal for the lease of public property and infrastructure financing) in order to substantiate -- that all project-related development, land and water uses, management of access to the tidelands and submerged waters, and costs and burdens passed on to the general public for having continued historic access to and use of the tidelands and submerged waters (e.g., valet parking fees) comply with the Tidelands Grant of 1915, as amended in 1971, including, especially, the restrictions on the use of tidelands and submerged lands set forth in sections 2 through 4 thereof, and in section 5 regarding the use of former tidelands in the harbor, all of which the state Legislature enacted to promote "maximum public use" of the tidelands and the submerged lands, and to attract private investment in development of the tidelands and submerged lands for "the highest and best use in the public interest." (See also Lane v. City of Redondo Beach (1975) 49 Cal.App.3d 251; Cal. Const., art. 10, section 4; Pub. Resources Code sections 30210, 30211, 30213.)

The second attachment to this appeal coversheet and appeal application form provides additional reasons and support for this appeal. The second attachment is followed by attached referenced documents.

**Attachment 1 to James A. Light Appeal of Harbor Commission Waterfront Actions**

**Location of Subject Property:** The project site (Longitude 33 degrees 50' 30.9"N/Latitude 118 degrees 23'30.7")is bounded by the Pacific Ocean on the west, the residential development on the east, the Port Royal Marina and Portofino Marina on the north; and the Redondo Beach Landing and the Los Angeles County Beach to the south.

**Additional Parties wishing to be named as Appellants:**

**Wayne Craig;** 506 #A S. Broadway; Redondo Beach, CA 90277; 310-897-1756; waynecraighomes@aol.com

**Martin Holmes**; 531 Esplanade Ave #912; Redondo Beach, CA 90277; 207-577-3232; goholmes@mit.edu

**Todd Loewenstein**; 722 N Lucia Ave #B, Redondo Beach, CA 90277; 323-359-8683; todd@arcostream.com

**Candace Nafissi;** 612 N Paulina Ave; Redondo Beach, CA 90277; 310-245-5871; candacekallen@gmail.com

**Nils Nehrenheim**; 344 Ave E; Redondo Beach, CA 90277; 310-344-1678; nils.nehrenheim@gmail.com

**Eugene J. Solomon**; 606N Juanita #5; Redondo Beach, CA 90277; 310-414-3504; eugene@eugenesolomon.com

**Building a Better Redondo**; 602B S Broadway, Redondo Beach, CA 90277; 310-989-3332; info@buildingabetterredondo.org

**Rescue Our Waterfront;** 506 #A S. Broadway; Redondo Beach, CA 90277; 310-897-1756; waynecraighomes@aol.com

**Redondo Residents for Responsible Revitalization**; 722 N Lucia Ave #B, Redondo Beach, CA 90277; 323-359-8683; todd@arcostream.com

**IBEW Local 11;** 297 N Marengo Ave, Suite 200; Pasadena, CA 91101; 626-243-9702

**Other organizations and individuals who wish to be listed as supporting this appeal:**

**Dean Francois**
**Friends of the South Bay Bicycle Paths**
**Malolo Tacos (outrigger team)**
**Olympus SUP Rentals**

**Attachment 2 to the Appeal of Harbor Commission Actions related to the Waterfront Project**

The Harbor Commission actions ignore or in and of themselves represent violations CEQA, the California Coastal Act, and Redondo's LCP, LUP, and zoning ordinances. The following pages provide detailed support to justify the appeal and demonstrate the Harbor Commission's actions should be nullified.

# CONSISTENCY WITH APPLICABLE STATE AND LOCAL REQUIREMENTS

The City and FEIR failed to address BBR's original assessment provided in its DEIR comments. Every current coastal-dependent recreational and commercial use is negatively impacted by the proposed development. The new boat ramp design is artificially constrained by the prioritization of non-coastal dependent commercial development. And it's proposed location impacts parking for boat slips that have been there since the harbor opened and parking and operational space for outrigger canoe clubs that have resided on Mole B since 1970. The most used park in Redondo Beach, Seaside Lagoon Park, is paved over for access and parking for non-coastal dependent recreational uses and toddlers are forced to wade in untreated harbor waters eliminating the unique elements and appeal of this park that has existed since the 1960's. . There is no parking allocated, protected or assessed for recreational uses of the waterfront. Forcing recreational users into a parking structure represents a deterrent and access limitation to those uses. Public views from Harbor Drive and Czuleger Park are significantly impacted despite City claims to the contrary. And the cumulative development cap is exceeded when one includes the new parking structure in the assessment as the city properly should. There is no question that the project prioritizes the commercial elements of the project over long standing coastal dependent recreational uses. These all represent violation of California Coastal Act, the City's Local Coastal Plan and the City's zoning ordinances. BBR provided specific citations in its DEIR comments that still stand.

Furthermore the City has violated the CEQA process by improperly assessing impacts as demonstrated herein and in our original DEIR comments, by inadequate definition of the project, by introducing substantial new changes (especially Mole B boat ramp location) just prior to the release of the FEIR. The city has failed to account for cumulative impacts properly. And the City's formatting of the FEIR, the short time constraint, and the remaining variability allowed in the project at this late stage have made it impossible for the public to provide a thorough review and comment.

The following table summarizes the violations of applicable state and local laws and regulations. Specific details related to and supporting the conclusion of violations appear throughout this document, though in some cases examples and details are included in the table itself.

| Requirement | Summary | Inconsistency |
|---|---|---|
| **Coastal Act 30001.5** | Goal of Coastal Act is to assure priority of coastal-dependent and coastal-related development over other development of the coast. | EIR and project prioritize non-coastal dependent uses over existing and required coastal dependent uses |
| **Coastal Act 30006** | Planning and implementation of programs should include widest opportunity for public participation | Last minute changes to EIR and project, complicated arrangement of EIR, short review period, missing data and reports, and slow response to public records requests artificially limit public participation |
| **Coastal Act 30006.5** | Sound and timely scientific recommendations are necessary. | EIR analysis relies on outdated data such as harbor surge data and incomplete data such as harbor water quality to justify conclusions that there is no impact. |
| **Coastal Act 30007.5** | Conflicts between policies to be resolved in manner of which is most protective of coastal resources | EIRand project resolve conflicts to favor non-coastal dependent commercial development |
| **Coastal Act 30105.5** | Definition of cumulative effects | EIR analysis ignores probable future projects. |

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| **Coastal Act 30211 and 30212** | Development shall not interfere with access | The traffic generated by the project combined with circulation infrastructure constraints interferes with access to access to coastal dependent activities.<br><br>The lack of sufficient and convenient parking interferes with the public's access to coastal dependent activities.<br><br>The creation of hazardous situations interferes with the public's access to coastal dependent activities and resources.<br><br>The decrease in size and capacity of coastal dependent activities and areas interfere's with the public's access to coastal dependent activities and resources. |
| Coastal Act 30212.5 | Public parking area and facilities shall be distributed to mitigate social and other impacts of overcrowding and overuse | The project more than doubles commercial development while shrinking usable public parkland. The project fails to assess or provide adequate and convenient parking for existing and new coastal dependent uses. |

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| **Coastal Act 30213** | Encouragement of lower cost visitor and recreational facilities | Project designed to appeal to more affluent public. Unique recreational resources drawing all income level customers are negatively impacted by the project. |
| **Coastal Act 30214** | Legislative intent on implementation of public access policies | The project increases the intensity of site utilization to the point where it is a deterrent to those who want to enjoy coastal dependent uses. The project does not balance rights of public with that of developer/lessee. |
| **Coastal Act 30220** | Coastal areas suited for water-oriented recreational activities shall be protected for such uses. | Project develops harbor area such that water-oriented recreational uses are needlessly impacted. |
| **Coastal Act 30221** | Oceanfront land suitable for recreational use shall be protected for such use | Project redevelops oceanfront property in a manner that negatively impacts long established recreational uses |
| **Coastal Act 30222** | Use of private lands suitable for visitor serving and coastal recreational facilities shall have priority over general commercial development | The project prioritizes private retail, dining and entertainment uses over coastal recreational facilities. |
| **Coastal Act 30223** | Upland areas necessary to support coastal recreational uses shall be reserved for such uses | Uplands parking and vehicular access for coastal recreational uses are negatively impact by the project. |

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| **Coastal Act 30224** | Increased recreational boating use shall be encouraged | Project reduces slips and provides insufficient space for adequate boat ramp. Project eliminates sufficient boater parking. Project forces recreational boating uses in small area that reduces overall capacity and efficacy of long standing recreational boating uses. Parking to support existing recreational boating uses are insufficient and inconvenient to the point of acting as a deterrent. Limited hours of pedestrian bridge discourages recreational boaters. Project does not accommodate future growth of demand of recreational boating infrastructure and opportunities. |
| **Coastal Act 30234** | Facilities serving commercial fishing and recreational boating industries shall be protected and upgraded. Existing facilities shall not be reduced. | Project forces commercial and recreational vessels out of Basin 3 due to pedestrian bridge. Project eliminates slips for commercial and recreational vessels. Project allows elimination of nearly 50% of current slips in Basin 3 without any analysis to show demand no longer exists. |
| **Coastal Act 30234.5** | The economic, commercial, and recreational importance of fishing shall be protected. | The project provides insufficient parking for pier, commercial and charter boat fishermen. The project reduces usable commercial and recreational boat slips. |

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| **Coastal Act 30240** | Protection of sensitive habitat areas | The harbor area is known roosting place for multiple protected marine birds. Intensity of development will be a deterrent to future nesting/roosting. |
| **Coastal Act 30251** | Development shall be designed project views | Project blocks most public views from harbor drive. |
| **Coastal Act 30252** | Maintenance and enhancement of public access | Project prioritizes parking and access to retail, dining and entertainment uses over coastal dependent and coastal related uses. Inadequate parking to support current level or harbor recreation or for future growth in demand. Project decreases usable public parkland at Moonstone Park and Seaside Lagoon. |
| **Coastal Act 30255** | Coastal dependent development shall have priority over other development on or near the shoreline. | Coastal dependent uses, particularly the Seaside Lagoon and public boat ramp are negatively impacted by the prioritization of othe non-coastal dependent uses. |
| **CEQA Public Resources Code 21002** | Public agencies should not approve projects if there are feasible alternatives that would avoid or significantly lessen the significant impacts. | FEIR failed to identify all significant impacts created by the project. FEIR failed to examine feasible alternatives. |
| **CEQA Public Resources Code 21002.1(a)** | Purpose of EIR is to identify significant impacts and to indicate how they can be mitigated or lessened | FEIR fails to identify all significant impact foreseeable with the project. FEIR fails to identify potential mitigations and alternatives to avoid the impacts. FEIR dismisses alternatives and mitigations that are feasible. |

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| **CEQA Public Resources Code 21002.1 (b)** | Public agency SHALL mitigate or avoid significant impacts when feasible | FEIR fails to identify potential mitigations that are feasible. FEIR wrongfully dismisses alternatives and mitigation that are feasible. |
| **CEQA Public Resources Code 21002.1(c)** | Allows public agency to approve project with impacts if mitigations are not feasible and are otherwise legal. | FEIR fails to identify and wrongfully dismisses feasible mitigations and alternatives. Project violates numerous state and city land use laws, regulations, and codes. |
| **CEQA Public Resources Code 21002.1 (d)** | Lead agency must consider all effects of the entire project. | Boat ramp configuration still in development and impacts were not analyzed at all in DEIR and incompletely in FEIR. Combination of potential reduction of slips in Basin 3, elimination of sport fishing pier, move of large commercial vessels out of Basin 3, and/or a Mole B boat ramp are not adequately evaluated. |
| **CEQA Public Resources Code 21002.1 (e)** | Lead agency to focus EIR discussion on significant impacts. | FEIR missed significant impacts and found wrongly that significant impacts are not significant. Thus these impacts were not discussed. |
| **CEQA Public Resources Code 21003 (b)** | Documents to be organized written in a manner that will be both meaningful and useful to the public. | FEIR format never used before in Redondo and was found confusing and over burdensome by the public and by Harbor Commissioners per testimony at the Harbor Commission hearings. |
| **CEQA Public Resources Code 21005. (A)** | Noncompliance with information disclosure requirements may constitute a prejudicial abuse. | City failed to respond in a timely manner to public records request for key information that was necessary to evaluate city findings and conclusions. |

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| **CEQA Public Resource Code 21080 (e) (1) and (2)** | Substantial evidence is required. | Certain FEIR conclusions involve speculation, "cherry picking" of data while ignoring other evidence, and relying on unsupported public testimony while ignoring other testimony. For example, the city took one data point on harbor water quality and speculated it would be acceptable for human swimming while data provided in the DEIR showed open ocean waters outside the harbor failed water quality testing 25% of the time. |
| **CEQA Public Resource Code 21081 (a)(1)** | Public agency prohibited from approving a project unless mitigations or alternative to avoid significant impacts have been required. | The FEIR does not impose feasible mitigations or project alternatives that avoid or lessen significant impacts. The FEIR fails to identify and address all significant impacts. |
| **CEQA Public Resource Code 21081 (b)** | Requires Statement of Overriding Considerations for significant impacts that are not mitigable. | The FEIR fails to identify and address all the significant impacts of this project. The Statement of Overriding Considerations fails to address all significant impacts that have not been mitigated or avoided. The Statement of Overriding Considerations includes justification that is inadequately substantiated, such as revenue projections from the project and funding commitments allocated to the developer without documentation demonstrating the developer is obligated to fund these commitments. |

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| **CEQA Public Resource Code 21081.5** | Requires finding of Statement of Overriding Considerations to be based on substantial evidence in the public record. | The FEIR fails to identify and address all the significant impacts of this project. The Statement of Overriding Considerations fails to address all significant impacts that have not been mitigated or avoided. The Statement of Overriding Considerations includes justification that is inadequately substantiated, such as revenue projections from the project and funding commitments allocated to the developer without documentation demonstrating the developer is obligated to fund these commitments |
| **CEQA Public Resource Code 21081.6** | Requires a Mitigation Monitoring Program that monitor execution of the mitigations and that the mitigations effectively mitigate the impact. | The mitigation monitoring program is incomplete as it does not address all significant impacts. For the impacts it does address, it fails to establish performance objectives that address the significant impacts. For example, the traffic mitigations do not list any measure that the mitigation avoided significant traffic impacts created by the project. |
| **CEQA Public Resources Code 21092.1.** | When significant new information is added to an environmental impact report after notice was given, the public agency shall give notice again. | The City has substantially changed the configuration of the now approved Mole B Boat ramp. The EIR does not reflect this change or its impacts. If the EIR were properly updated, the City will have violated this requirement. |

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| **CEQA Guidelines 15003 (b)** | The EIR serves to protect the environment and to demonstrate to the public the environment is being protected | The EIR fails to identify all significant impacts. The project is still in flux so the public cannot be sure new impacts will not result. Feasible mitigations are superficially evaluated as infeasible. |
| **CEQA Guideline 15003 (d)** | EIR is to demonstrate agency has analyzed impacts | Project is in flux and allows significant variability (sport fishing pier deletion, elimination of boat slips) that could result in changes that would likely add new significant impacts. EIR improperly concluded some significant impacts as insignificant (eg. Views). EIR neglected to address significant impacts identified and substantiated by the public. |
| **CEQA Guideline 15003(f)** | CEQA intended to afford fullest possible protection. | EIR fails to achieve this policy. It artificially justifies the dismissal of significant impacts as insignificant. It ignores significant impacts identified and substantiated by the public. |

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| **CEQA Guideline 15021** | Imposes a duty to minimize environmental damage and balance competing public objectives. | The EIR and actions of City and Harbor Commission avoid mitigations and alternatives that are feasible and would eliminate or reduce environmental impacts. Where ever competing public policies were adjudicated, the city and Harbor Commission adjudicated in favor of the non coastal dependent, private commercial development to the detriment of the public, coastal dependent public infrastructure, resources and interests. |
| **CEQA Guideline 15043** | Allows agency to approve a project despite significant impacts if there is no feasible way to lessen the impacts, and the agency provides specific benefits that outweigh the signficant impacts. | EIR fails to address all significant impacts. EIR wrongly concludes certain mitigations are not feasible. The Statement of Overriding Considerations fails to provide evidence that the justifications are based on accurate statements. |
| **CEQA Guideline 15065 (c)** | If an impact is found to likely be signficant the agency shall analyze the impacts in depth, make detailed findings of alternatives and mitigations, and when mitigations or alternatives are feasible alter the project to lessen or avoid the impacts. | EIR fails to address all significant impacts. EIR wrongly concludes certain mitigations are not feasible. There are many viable alternatives that would better balance the project, reduce and mitigate impacts and achieve the goals of the City's General Plan and LCP. The EIR avoids these feasible alternatives and mitigations. |
| **CEQA Guideline 15088(c)** | Responses to public comments unsupported by factual information do not suffice. | Many responses fail to cite factual information or cite flawed information. |

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| **CEQA Guideline 15088.5** | The agency shall recirculate the FEIR when significant new information is added or when the DEIR is so inadequate that meaningful public review was precluded. Decision not to recirculate must be supported by evidence in the administrative record. | The EIR introduces a new boat ramp location and configuration that was not addressed in the DEIR. The new configuration eliminates existing public parking and boat slips. The final configuration is still not finalized. The public cannot comment to the impacts because the configuration has not been finalized. Additionally, the DEIR had so many combinations and permutations of alternatives that it was impossible to evaluate the impacts of all combinations and permutations. The final project was not and is not defined with enough specificity to determine impacts (eg: options for boat ramp, sport fishing pier, basin 3 number and sizes of slips,and movement of commercial boats out of Basin 3. The EIR does not provide evidence of decision not to recirculate. |

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| **CEQA Guidelines 15090** | Requires that the decision making body reviewed and considered FEIR prior to approval. Requires that public can appeal decision of non-elected body. | Several commissioners commented about the complexity of the format of the FEIR and complained that they did not have sufficient time to fully assess the information. Several commented on missing data and questionable evaluations. The Chairperson publicly stated her desire to move the process along because she expected the Commissions actions to be appealed anyway. The City requirements for CEQA appeal are overly onerous and have already resulted in the rejection of a public appeal based on technicalities rather than the grounds for appeal. The appeal process also imposes onerous and unreasonable deadlines before the City Council hearing for data submission. These requirements serve to discourage and prevent appeals required by this CEQA requirement. |
| **CEQA Guideline 15091** | Prohibits approval of EIR and project unless agency provides findings for each significant impact. Findings shall describe changes,avoidances, mitigations, or why mitigations are not feasible. Findings must include substantial evidence. | EIR fails to address all significant impacts. EIR wrongly concludes certain mitigations are not feasible. Findings are not always based on substantial evidence. |

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| **CEQA Guideline 15092** | Prohibits project/EIR approval unless all significant impacts are mitigated or avoided or that impacts are unavoidable. | EIR fails to address all significant impacts. EIR wrongly concludes certain mitigations are not feasible. |
| **CEQA Guideline 15093** | Requires statement of overriding considerations when significant impacts cannot be mitigated. Requires Statement of Overriding Considerations to be supported by substantial evidence in the record. | Statement of Overriding Considerations fails to provide substantial evidence of its statements. For example the statement states city revenues expected from the project, but this revenue projection has never been presented in the public record. |
| **CEQA Guideline 15124** | EIR shall include a project description to the level needed for evaluation. | Since this is a project EIR that would result in development rights, the project requires sufficient description to ensure the impacts are properly evaluated. The project allows too much variability such that the combination of options result in wide ranging and potentially additive impacts. Mole B boat ramp is not adequately described to determine impacts, yet the zoning requires a boat ramp with the rest of the project. Examples: The boat ramp, elimination of Sportfishing pier and elimination of slips in Basin 3 all have impacts which in different combinations could be significant. Option on valet parking may artificially constrain the already constrained parking such that it exacerbates the parking shortage and prevent public access to the waterfront. |

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| **CEQA Guidelines 15126.2** | Requires identification and focus on significant impacts of the project. | The EIR fails to identify all significant impacts. The project is not adequately described to determine impacts. Boat ramp configuration is still in flux and could not have been analyzed. |
| **CEQA Guidelines 15126.4** | Levies requirements for the agency to assess significant impact mitigations or avoidance. | EIR fails to address all significant impacts. EIR wrongly concludes certain mitigations are not feasible. Project is not adequately defined to identify all significant impacts. |
| **CEQA Guidelines 15126.6** | Requires agency to assess alternatives. | Two alternatives were defined by the filing of the Harbor CARE Act and the BBR submission. These alternatives were not analyzed. Several alternatives in the DEIR and EIR were incorrectly rejected due to inadequate and unsupported analysis. |
| **CEQA Guidelines 15130** | Requires agency to consider cumulative impacts. | EIR ignores cumulative impacts cited by multiple organizations. Both the AES site reconfiguration and the Plan Hermosa General plan update include foreseeable and predictable increases in development that will produce impacts far greater than the city evaluated using the regional growth averages. The size and scope of cumulative impacts of known projects renders the regional average inadequate. |

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| **CEQA Guidelines 15131** | Allows the agency to assess the social impacts of the development | While not required, ample evidence demonstrates it is the desire of the developer and many of its supporters to intentionally exclude visitors or all income levels and social status. |
| **CEQA Guidelines 15140** | Requires EIRs to be written so decision makers and public can "rapidly" understand the documents. | The EIR is a very difficult document to evaluate due to the reliance on massive cross referencing. Multiple members of the public and the Commissioners commented on the complexity of the document created by its formatting. |
| **CEQA Guidelines 15165** | Requires that multiple and phased projects shall be included in a single EIR. | This section requires that the boat ramp be included in this EIR. The boat ramp is not adequately defined to assess impacts. Alternatives on Mole C and D are eliminated with approval of the EIR yet these alternatives are superior from an environmental perspective and Mole D especially is feasible. |
| **Redondo Beach. Coastal Land Use Plan Section VI, Subsection C** | Cumulative development shall not exceed a net increase of 400,000 sq ft of floor area. | Project excludes new parking structure from analysis. Project and cumulative development exceeds cap. City interpretation does not reflect information presented to the voter when voters enacted this cap. |

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| **Redondo Beach. Coastal Land Use Plan Section VI, Subsection C** | Protection of views from Czuleger Park | EIR does not adequately assess view impacts. Substantial impact on views from mid and lower sections of park by hotel/retail development in pier area and Market Hall in harbor area. |
| **Redondo Beach. Coastal Land Use Plan Section VI, Subsection C** | New development shall include view corridors from N Harbor Drive | Development blocks vast majority and most impactful public views from visitor serving hotels, Harbor Drive of harbor, ocean, coast of PV and Catalina Island. The development only affords narrow slivers of views and these are impacted by landscaping. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 1** | Coastal dependent land uses encouraged. Existing facilities preserved, enhanced and expanded where feasible. Public boat launch shall be built. Removal of existing uses shall be strongly discouraged unless determined uses are no longer necessary. | The project cuts slips without any analysis or projection of future needs. The city shrank usable land and water area of Seaside Lagoon and configured it to discourage use. The project reduces parking for commercial uses and makes it inconvenient further discouraging and artificially limiting use. Public boat ramp is suboptimized due to non-coastal dependent use prioritization. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 2 a)** | New development shall be designed to preserve and enhance public views from Harbor Drive | Project blocks vast majority of public views from Harbor Drive. |

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| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 2 c)** | New development shall be designed to be consistent and harmonious with scale of existing development | Massing and scale are inconsistent with rest of harbor and surrounding area. Parking structure combined with commercial development increases development by 1000% in the harbor portion. Model shows massing is inconsistent and not harmonious with surrounding development. Lack of setbacks and buffers between massive structures exacerbates scale and massing inconsistencies. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 17 and 18** | Development shall not impact environmentally sensitive habitat areas | Protected marine birds are known to nest in Palm trees throughout project. Size, scale, and intensity of project will impact nesting/roosting areas. |
| **Redondo Beach Harbor Civic Center Specific Plan Transportation/Circulation Policies** | Improve bike path safety, appearance and functionality | Project bike path is dangerous and routed through an urban canyon with no pier/ocean views. Development blocks most of the views from the new bike track on Harbor Drive. |
| **Redondo Beach Harbor Civic Center Specific Plan Transportation/Circulation Policies** | Requires adequate parking supply to support expected activity | Parking insufficient for development and long established recreational uses |

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| **Redondo Beach Harbor Civic Center Specific Plan 5.5.1** | Requires protection of public views to, through and across the harbor area east/west and north/south. Ensure design and placement of structures improves and enhances visual and bicycle access to the waterfront and shoreline. | Development creates virtual wall along Harbor Drive blocking the best views of the harbor, ocean, cliffs of PV, boats, and Catalina. Bike path through project is impeded by dangerous routing and crossings and by creating a virtual urban canyon through the project and along the bike track on Harbor Drive. |
| **Redondo Beach Harbor Civic Center Specific Plan 5.5.1** | Requires preservation, protection, and expansion of public open space, recreational land, and water areas and uses and recognize their importance as a limited and valuable resource of the community and many users of and visitors to harbor area | Seaside Lagoon Park open space paved over and built upon reducing usable size. Packing boat ramp onto Mole B impacts all recreational uses on the Mole and results in an undersized dangerous boat ramp. |
| **Redondo Beach Harbor Civic Center Specific Plan Zone 1** | Rerouting of bike path to improve use, visibility, and safety | Project creates three dangerous street crossings and multiple parking driveway crossings, visibility is eliminated as bike path is in an urban canyon between a retaining wall and the hotel. |

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| **Redondo Beach Municipal Code 10-5.800 (b)** | Provide development designed to enhance public opportunities for coastal recreation, including commercial retail and service facilities supporting recreational botany and fishing which primarily oriented toward meeting dees of visitors, boaters and residents seeking recreation; have balanced diversity of uses; provides regional serving recreation for all income groups, and protect coastal resources. | Development is designed to increase non-coastal dependent retail, dining and entertainment at the expense of recreational uses serving all income groups and businesses and facilities supporting those uses. |
| **Redondo Beach Municipal Code 10-5.814 (b)(1)** | No wall like development on second story in front of Czuleger Park | Second floor of Market Hall includes a T shaped structure outline. This creates a wall like view blockage. New hotel development creates wall-like development blocking views from Czuleger Park. |
| **Redondo Beach Municipal Code 10-5.1110** | Permitted and conditional uses of land zoned P-PRO | Permitted uses do not include public roads primarily serving private commercial development. |
| **Redondo Beach Municipal Code10-5.1706** | Parking regulations and Shared parking analysis | Shared parking analysis did not account for peak uses of proposed uses and for peak uses of recreational uses of harbor. Shared parking analysis does not account for attraction of waterfront location and its impact on concurrent peak uses. Assessment did not consider impact of exclusionary valet parking. |

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| **Redondo Beach Municipal Code 10-2.2502 (b)** | Defines the criteria the Commission is to perform their design review. | Although Commissioners commented on scale, parking, compatibility, integration with current uses, I and traffic, the Commission ignored these inconsistencies in their final approvals. The design review did not define the controls of traffic ingress and egress throughout the project. |
| **General Plan Parks and Recreation Element. Objectives 8.2a** | Provide view corridors to marina and ocean from surrounding area | Proposed project eliminates 85% of the views from Harbor Drive and impacts views from Czuleger Park |
| **General Plan Parks and Recreation Element. Policies 8.2a.2** | Increase recreational boating opportunities for residents and visitors | Project eliminates slips. Required boat ramp is not sized for demand and future growth in demand. Parking not assessed and not conveniently located for human powered vessel activities. |
| **General Plan Parks and Recreation Element. Policies 8.2a.8** | Preserve and enhance unique and valuable resources | Unique attributes that make Seaside Lagoon attractive to families are eliminated |
| **General Plan Parks and Recreation Element. Policies 8.2a.10** | Enhance parking and circulation | Parking is not assessed for recreational uses and it is inconvenient. Traffic gridlock will serve as a deterrent to recreational uses. |
| **General Plan Parks and Recreation Element. Policy 8.2a.4** | Charges city to explore expanding Seaside Lagoon park. | Proposed project effectively shrinks Seaside Lagoon. |
| **General Plan Parks and Recreation Element. Policy 8.2b.5** | Minimize parking conflicts at parks. | No convenient parking for Seaside Lagoon. No parking demand assessed for Seaside Lagoon. |

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| **General Plan Parks and Recreation Element. Policy 8.2b.6** | Provide safe bicycle access and linkage | Bike path design increases danger by requiring three street crossings at 90 degree angles. Reduces today's linkage of pier bike path to Harbor Drive Bike Path. |
| **General Plan Parks and Recreation Element. Policy 8.2d.3** | Evaluate needs of various demographics for facility planning | Project eliminates Seaside Lagoon's desirable attributes for families with toddlers. Eliminates accommodation of Seaside Lagoon users who arrive in buses. |
| **General Plan Parks and Recreation Element. Implementation Programs** | Calls for creating view corridor to Seaside Lagoon from Harbor Drive and for expanding Seaside Lagoon park. | Waterfront project blocks views of Seaside Lagoon and shrinks the parkland and usable water area. |
| **General Plan Parks and Recreation Element. Implementation Programs** | Determine if following sites can be used for new parkland/ recreation: Octagonal building, Triton Oil site | Triton oil site allocated for parking. Octagonal building will be commercial development. |
| **General Plan Parks and Recreation Element. Implementation Programs** | Expand land area of Seaside Lagoon | Project effectively reduces size of Seaside Lagoon |
| **General Plan Parks and Recreation Element. Implementation Programs** | Conduct parking analysis to mitigate problems of peak use of parks. | Recreational parking demand not assessed in project. Parking is not convenient for recreational uses. |

## CITY PROCESS DESIGNED TO HINDER, DETER, AND LIMIT RESIDENT REVIEW, PARTICIPATION, AND COMMENT

The City produced a nearly 1500 page FEIR package that is heavily cross referenced in a format never before used by the city on a project of zoning change of this magnitude. The city continues change key elements of the project, especially the boat ramp location and configuration. The Harbor Commission approved the Waterfront EIR without the final configuration of the required boat ramp and its impacts. This move may eliminate the environmentally superior solution for the boat ramp and combined development. Despite multiple public record requests, the city has not provided all its analysis on traffic. And the city relies on old studies and models for key impact assessments. The city has not conducted adequate analysis of safety and environmental impacts. For example after years of deliberation, the city has only a one day data point on harbor water quality for public swimming. And even today, the project description allows too much variability for a final project approval. The public has insufficient description and data for the public to fully understand the true impacts of the final project.

### INSUFFICIENT TIME/MOVING TARGET –

The public cannot reasonably comment on a changing or ill defined project. The boat ramp location drives critical impacts no matter where it is placed. The City continued to alter the boat ramp location and configuration right up to the final meetings in the final EIR. Even now the public does not have a final configuration and details to make an assessment of the impacts. Several Commissioners stated publicly that they did not feel they had enough time to review the documents, the comments, and the projects constant changes adequately. And while city staff called Councilman Brand's Community Meeting a public meeting on the boat ramp, the meeting

was not properly agendized, noticed and recorded to be counted as a public meeting for this purpose.

## CHALLENGING FORMAT –

The complex cross-referencing renders the EIR much more difficult to understand, analyze and respond. By referring back to the DEIR, the city forces residents to look through nearly 8000 pages of information. The city has never used this format before. Prior to this final EIR's were standalone documents that could be read from front to back to understand the project, the the responses to comments and any changes. The new format alone drives the need for more time for reasonable review and even then is a difficult document to fully digest. Several Harbor Commissioners complained they did not have the time to understand everything in the document due to the complex, heavily cross referenced document and the changes since the DEIR.

## INCOMPLETE DATA–

The city has not provided full traffic analysis as requested nor has it completed adequate analysis of parking, traffic, harbor water quality, and recreational impacts of the development. BBR sent in a public records act request for any new analyses,studies and data generated since the DEIR was published. The city responded that all is available in the DEIR. BBR has been unable to find the detailed assessment of LOS for weekend conditions. The city responded to a second request specifically for the detailed LOS assessment and now the city has responded it needs more time. The people cannot respond to an analysis the city has not made available.

Similarly, the public does not yet have the final form of the CUP in order to do a thorough appeal justification.

## SUMMARY

The public has not been provided sufficient time, information, or project description to understand and assess the impacts of the ever changing Waterfront project.

***The project is not defined well enough and the current EIR is not sufficient to fully define the impacts of a project that is at the entitlements stage. The appropriate action is to properly definitize the project including the location and configuration of the boat ramp, the final decision on the Sportfishing pier, and the number of slips to be reduced by the project. The city should and redo the impact analysis and rerelease as a Draft EIR.***

## FEIR IMPACT ASSESSMENTS

***The public has been unable to complete a through review and comment on the impacts of the project as the project description allows too much variability, the boat ramp configuration is still in development, and key data has been withheld from the public or was never considered by the City. A top level analysis of the topics that follow is included based on the level of understanding that was achievable in the time period allotted, the level of description available, and the absence of key information required to make a reasonable assessment.***

# IMPACT SUMMARY

The EIR, City Staff responses, and the Harbor Commission approval misrepresent many of the impacts of the project. These misrepresented impacts are summarized in the following table. Some of these comments have not been addressed in the deliberations and others provided flawed responses.

| | Infrastructure or Amenity | Impact | Level of Impact |
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| CDC-1 | Cumulative Development Cap | Project exceeds cumulative development cap. It consolidates too much of the cap into too small an area. | SIGNIFICANT – violation of state and local law. |
| HPWVA-1 | Human Powered Water Vessel access | Insufficient and inconvenient parking and access | No parking was assessed for these users despite growing popularity. City only speculates at use rate. Parking in parking structure is a deterrent to use. Proposed mitigations are unproven, not reasonable and are predictably not viable. |
| HPWVA-2 | Shared launch area with wading toddlers | Danger to toddlers. If lane is roped off it further limits usable space for toddlers. | SIGNIFICANT – Hazardous conditions are a deterrent to utilization. |
| HPWVA-3 | Shared launch site or close proximity to boat ramp (Mole B Human Powered Vessel Launch) | Danger to human powered water craft users. Dangers include improperly designed dock float (too high) or use of slippery boat ramp. Danger of trailer boater not seeing or being unable to avoid contact with human powered vessel due to sight lines and/or task saturation. | HAZARDOUS SIGNIFICANT – dangerous solution. Uses should not be collocates in close proximity. Danger is a deterrent to use. |

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| SSL-1 | Seaside Lagoon | Decreased usable public parkland | SIGNIFICANT – Redondo is park poor by its own standard. City documents show the city designated about 2.5 acres east of Seaside Lagoon for Seaside Lagoon parking. That brings total land area formerly designated to serve public parkland from 6 acres to 2 acres. This project dramatically decreases current usable parkland. Open space in commercial area is not configured to replace lost usable public parkland. EIR states there will be frequent CenterCal events in the park area which will deny or further limit public access to the beach and for launching and retrieving human powered craft. Significant deterrent to use. |
| SSL-2 | Seaside Lagoon | Decreased toddler wading area | Significant – at mid-tide loss is at least 75% of current wading area. Limits use from current capacity.. |
| SSL-3 | Seaside Lagoon | Exposure to surge | HAZARDOUS/SIGNIFICANT – key attraction of current lagoon is the safety of no surge or wave action. Deterrent to use. |
| SSL-4 | Seaside Lagoon | Exposure to tide | HAZARDOUS/SIGNIFICANT – Lifeguards cannot rope off safe depth for toddler wading as in current lagoon. Tide changes will significantly impact safe toddler wading area. Deterrent to use. |

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| SSL-5 | Seaside Lagoon | Exposure to breakwater rocks | HAZARDOUS/SIGNIFICANT – Large breakwater rocks on north and south end of proposed swim area would attract toddlers. Wet rocks, large holes, sharp edges combined with surge and tidal changes represents a significant hazard not present in current lagoon. Deterrent to use. |
| SSL-7 | Seaside Lagoon | Inconvenient parking | SIGNIFICANT – Parking in parking structure is a deterrent as it creates difficulty in moving family and gear to and from the lagoon. Visitors would have to negotiate parking structure, commercial shops, an active road and a pedestrian promenade before arriving at the lagoon. During summer weekends, limited parking could mean parking significant distances away which would deter utilization. Proposed parking configuration would not support buses used by school, church and similar groups who use the lagoon. Limit from current capacity and deterrent to current use levels. |

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| SSL-8 | Seaside Lagoon | Loss of security fence | SECURITY/SIGNIFICANT – Current fence provides families confidence their children cannot exit beach area unaccompanied and provides confidence the children are protected from strangers outside the park. Elimination of the fence eliminates the security assurance for parents. Deterrent and increased safety risk. |
| SSL-9 | Seaside Lagoon | Swimming with boat traffic | HAZARDOUS/SIGNIFICANT – The EIR suggests older children/adults would swim in harbor. Boat traffic would have difficulty seeing swimmers. Very dangerous situation. If, alternately, swimming is limited to current hand launched boat ramp breakwater area, the area is too small for recreational swimming. The breakwater rocks on the sides represent a hazard to adventurous older children especially with the elimination of the water slides at the current lagoon. Hazardous and/or limiting capacity – deterrent to use. |

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| SSL-10 | Seaside Lagoon | Sea lion haul out potential | SIGNIFICANT/HAZARDOUS - Sea lions have been reported in the Marina parking lot. With the colony growing it is foreseeable that subdominant males would haul out on the beach. Waders, SUP'ers, and kayakers launching through or returning through sea lions would be hazardous and would violate MMPA. City officials are unlikely to be available at all hours. And there would be no means to call for help for a returning kayakers or SUP'er. |
| SSL-11 | Seaside Lagoon | Monthly water testing | HEALTH RISK/ SIGNIFICANT - The CUP requires monthly testing water quality testing in summer and quarterly thereafter. This does not provide adequate health protection to prevent/ minimize exposure to unhealthy, untreated harbor waters. The city only has a one day data point on harbor water quality. Hazardous/deterrent. |
| SSL-12 | Seaside Lagoon | Swim area silting | SIGNIFICANT – The EIR does not require the depth of swim area to be maintained. Swim area is already much smaller, losing more would increase impact. |
| SSL-13 | Seaside Lagoon | Loss of play fountains and water slides | SIGNIFICANT/HAZARDOUS – Children love playing in the fountains and water slides. Loss of these amenities would decrease attraction of facility. Also children likely to be attracted to breakwater rocks for entertainment in the water. |

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| SSL-14 | Seaside Lagoon | Exposure to untreated harbor waters | HEALTH RISK/SIGNIFICANT – Waters north and south of the harbor fail health testing 25% of the time. City has only taken health related water quality tests on one day in harbor. Limited circulation combined with proximity to sea lion barge and bird guano on harbor breakwater rocks increases risk of unhealthy water. Flushing action of tide would be ineffective since ocean waters have questionable healthiness. |
| SSL – CUMULATIVE ASSESSMENT | | SEASIDE LAGOON CUMULATIVE IMPACT | HAZARDOUS, SIGNIFICANT, AVOIDABLE - Sum of impacts represent a significant and avoidable impact. **MITIGATION: maintain park usable open space in current configuration and same or similar water feature and provide convenient and adequate parking.** |

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| WP-1 | Waterfront Parking | Insufficient parking | SIGNIFICANT - Waterfront area parking assessment ignored recreational uses and current evidence of saturation of current parking with current development. Current city documents show over 200 parking spaces allocated to Seaside Lagoon, 120 parking spaces for Basin 3 slips and Sportfishing boat passengers, and 67 parking spaces for boat trailers. Parking demand did not include these requirements or other demands of recreational users such as SUP'ers and kayakers. Current lots are at capacity on summer weekends. Parking increase is insufficient to accommodate current uses plus added commercial development. Parking is inconvenient for recreational uses too far, dangerous street crossings, improperly configured for long water vessels...Artificially limits access to long existing recreational and coastal dependent uses. Difficulty of parking configuration represents a real deterrent to recreational uses. Replacement parking for lost Herondo parking not adequately defined. Mentions Triton Oil parking lot but that is far from Herondo and is already allocated to serve Shade Hotel and Cheesecake Factory. MITIGATION – more parking. Define Herondo parking space replacement. Surface level parking set aside |

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| MMBR-1 | Mole B Boat Ramp | Parking – loss of over 70 current parking spaces, insufficient trailer parking | SIGNIFICANT – Parking analysis not provided. Insufficient parking for concurrent boating, launching and outrigger canoe club activities especially on summer weekends. City states that they will provide a parking attendant but has not revealed how that would remedy inadequate parking. City ignores growth of demand as economy recovers and population increases. No overflow parking defined or analyzed. Proposed reservation system would be ineffective. Proposed parking does not comply with State Guidelines and when added together the lack of parking is compounded. |
| MBBR-2 | Mole B Boat Ramp | Loss of 25-36 current, occupied boat slips | SIGNIFICANT – Current large boat slip utilization is currently at or near capacity. Demand for larger slips is expected to increase. Compounded by move of commercial vessels out of Basin 3 and potential elimination of slips in Basin 3. Decrease from current capacity. Ignore growth of demand as economy recovers. |

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| MBBR-3 | Mole B Boat Ramp | Basin 1 Fairway location – Hazard to Navigation | HAZARDOUS/SIGNIFICANT – Location at western end of narrow Basin 1 fairway puts trailer boat in in a cross wind situation and at a location with a blind turn and heavy boat and SUP traffic. Insufficient maneuvering space for queuing. Queuing dock/hoist dock is right in Galveston wall blind spot. Numerous well qualified boaters, ex-harbor masters, and lifeguards testified to the dangers that are denied by the city. City statements of early launches do not account for family boating and jet ski launches which would be during peak fairway utilization. Jetski's difficulty in maneuvering well at slow speed is well documented. This is exacerbated with infrequent jet skiers.<br><br>Mole B location MAXIMIZES interaction with existing boating traffic. Must utilize Basin 1 fairway and main harbor fairway. Trailer boats must traverse entire length of harbor to reach harbor mouth.<br><br>HAZARDOUS, INSUFFICIENT CAPACITY – deterrent to use. MITIGATION – Mole D boat ramp addresses parking, maneuverability, capacity and safety. Mole C boat ramp addresses safety but not capacity and maneuverability/ traffic impacts. |

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| MBBR-4 | Mole B Boat Ramp | Crosswind | HAZARDOUS/SIGNIFICANT – Prevailing wind direction would blow vessels with motor problems into adjoining slips endangering the vessel in question and those downwind. Jet skiers have limited maneuverability at low speeds exacerbating this situation. |
| MBBR-5 | Mole B Boat Ramp | Impacts on adjacent existing recreational uses | SIGNIFICANT – in addition to severe lack of parking during weekends and other peak use periods, the reconfiguration to accommodate the boat ramp reduces Moonstone Park and the room available for the outrigger canoe club operations. This could shut down the 46 year old, 300 member outrigger canoe club and decrease the public parkland. The city already fails its own parkland standard and the reduction of Moonstone Park is further exacerbated by the reduction of usable space at Seaside Lagoon.<br><br>MITIGATION – Mole D boat ramp. |

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| MBBR-6 | Mole B Boat Ramp | Elimination of emergency helicopter airlift | HAZARDOUS/SIGNIFICANT – The City Council included the requirement for helicopter access to Mole B to support Harbor Patrol/lifeguard/Coast Guard emergency airlift operations related to the Harbor Patrol and Lifeguard docks and building on this Mole.. This capability was used July 6th to get a diver to a hyperbaric chamber on Catalina. The proposed configuration precludes meeting this stated requirement and puts the lives of the public at risk.<br><br>MITIGATION: Mole D Boat Ramp |
| MBBR-7 | Mole B Boat Ramp | Vehicular ingress and egress | HAZARDOUS/SIGNIFICANT – Mole B vehicular movement is hampered by two narrow lanes with parking on both sides and between the lanes. Ingress to the site is hampered by a limited turn pocket to get off Harbor Drive. Queueing to launch or return, especially on busy days when the parking is at or over capacity could result in traffic impacts on Harbor Drive and on all traffic, including emergency vehicle traffic into and out of the Mole to support Harbor Patrol and Lifeguard operations.<br><br>MITIGATION: Mole D Boat Ramp. |

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| MBBR-Cumulative Assessment | | Mole B Boat Ramp Cumulative Assessment | HAZARDOUS/SIGNIFICANT/ IMMITIGABLE - Mole B is the worst alternative for a boat ramp in King Harbor. It will have significant impacts on long term existing recreational uses of the harbor. It presents hazards to navigation. And it impairs emergency activities critical to safe harbor operation. Of all alternatives, Mole B represents most transit distance and interaction with main fairways and existing boat traffic in harbor. **SUPERIOR ALTERNATIVES**: Moles C and D represent safer and less impactful solutions. Mole D addresses traffic and capacity issues. Mole C does not. |
| MCBR-1 | Mole C Boat Ramp | Parking | LESS THAN SIGNIFICANT WITH MITIGATION– the Mole C Boat Ramp parking does not meet state guidelines. Also data from the Cabrillo boat ramp show traffic nearly every weekend would exceed proposed parking. MITIGATION: Overflow parking would have to be identified to meet expected and future needs. Potential sites include the Triton Oil site and the trailer parking east of Seaside Lagoon. However, both of these sites are currently slated for other uses. Moving overflow parking further away renders the solution untenable. |

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| MCBR-2 | Mole C Boat Ramp | Cross winds | SIGNIFICANT – prevailing cross winds would blow vessels with motor / operator problems away from ramp into rocks or the Seaside Lagoon swim/kayak/SUP area. PARTIAL MITIGATION: Configuring a breakwall east of the ramp would eliminate the risk to swimmers, kayakers, SUP'ers. |
| MCBR -3 | Mole C Boat Ramp | Maneuvering/Impact on existing SUP/ Kayak launch area | LESS THAN SIGNIFICANT WITH MITIGATIONS – The turn basin is the best location for a boat ramp due to the ability to maneuver with ample space outside the main traffic lanes. However, proximity to the Seaside Lagoon swim and launch area make this specific area heavily trafficked by human powered watercraft. MITIGATION: Can be mitigated by building a breakwall that separate traffic. Bouys in the water do NOT mitigate the risk as engine failure or operator error puts human powered craft at risk. Jet skis in particular are known for their poor maneuvering as low speeds.<br><br>Proximity to harbor mouth minimizes interaction with existing harbor traffic. |

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| MCBR-4 | Mole C Boat Ramp | Traffic/accessibility | SIGNIFICANT – Mole C suffers from the same limited turn pocket off of Harbor Drive that Mole B does. However, the roadway down Mole C is wider and does not have parking between and both sides of each lane. So it is better than Mole B. And since the Harbor Patrol is not on Mole C, emergency vehicle traffic is less of an impact. However, the planned parking structure and new road will bring more traffic into this immediate vicinity and Beryl is a major access road for the harbor. The traffic impacts are less than a boat ramp at Mole B but more than a ramp at Mole C. |
| MCBR-5 | Mole C Boat Ramp | Surge | LESS THAN SIGNIFICANT WITH MITIGATIONS – Harbor surge study is obsolete and should be reaccomplished with modern modeling techniques. However this is the highest surge alternative. MITIGATIONS: Curtail launching in large surge conditions. Or add a breakwall to diminish surge. Mole D boat ramp is better protected from surge. |

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| MCBR-Cumulative Assessment | | Mole C Boat Ramp Cumulative Assessment | A Mole C boat ramp is environmentally superior to Mole B. The turn basin is the best solution waterside as it provides ample maneuvering and queueing space outside of high traffic lanes. However, the location still has immitigable impacts to traffic. The Crab Shack lease makes this alternative more expensive or it delays the solution unnecessarily. |
| MDBR-1 | Mole D Boat Ramp | Parking | SUPERIOR SOLUTION – Mole D already houses 67 trailer boat parking spots exceeding state guidelines for a two lane boat ramp. These parking spots can be relocated closer to the ramp site. |
| MDBR-2 | Mole D Boat Ramp | Prevailing winds | SUPERIOR SOLUTION – prevailing winds would push vessels that have lost the ability to maneuver back to the launch point. No potential impact on other boats or slips. |
| MDBR-3 | Mole D Boat Ramp | Maneuvering/Impacts on other recreational uses | SUPERIOR SOLUTION – Turn basin is best location as it affords ample maneuvering and queueing space outside of traffic lanes. If configured properly, ramp traffic would be well clear of Basin 3 Fairway and Sportfishing pier (for whale watching and Sportfishing vessel boarding). Least impact and largest safety margin for SUP and kayak traffic and launch points. |

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| MDBR-4 | Mole D Boat Ramp | Traffic Accessibility/ Impact | SUPERIOR SOLUTION – Trailer traffic off of Harbor Drive is not a major cross intersection with Harbor Drive. Traffic is easily separable from traffic for other uses. No long narrow mole traffic maneuvering issues. Ample room for turn radius and other maneuverability requirements. |
| MDBR-5 | Mole D Boat Ramp | Surge | LESS THAN SIGNIFICANT WITH MITIGATION – Surge models are outdated and should be reaccomplished with new modern modeling techniques. Better protected from surge than Mole C. No major wave damage in this area since outer breakwall was built higher and thicker. If major storm would create damage here, a boat ramp is cheaper to replace than a commercial building. MITIGATION: Ramp can be closed if surge conditions become dangerous. A breakwall could be added to reduce surge substantially. |
| MDBR-6 | Mole D Boat Ramp | Visual impacts | ENVIRONMENTALLY SUPERIOR SOLUTION – Using the south end of Mole D for boat ramp parking would preserve and enhance views from Czuleger Park. |
| MDBR-7 | Mole D Boat Ramp | Boat Hoist | SUPERIOR SOLUTION – Current boat hoist could be retained with no additional coast. |

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| MDBR-8 | Mole D Boat Ramp | Site connectivity | LESS THAN SIGNIFICANT – Pedestrian bridge can still be accommodated. Waterfront promenade could include view points on either side of the ramp, similar to solution proposed at Seaside Lagoon in current EIR/project. Promenade could provide two routes, one across the ramp/ parking area for low utilization periods (similar to pedestrian crossing at Boat Yard crane access), and provide an alternate routing from International Boardwalk directly to sport fishing pier area. |
| MDBR-9 | Mole D Boat Ramp | Economic assessment | SUPERIOR SOLUTION - Only potential impacts to current leaseholds is Samba, which is on short term lease. Proposed Market Hall could be moved to a number of locations. Pacifica recommended a pier area location in their vision. Could also be in the International Boardwalk area where R10, Paddle House, Marina Offices and Captain Kidd's are located. Other alternatives available as well. |

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| MDBR-Cumulative Assessment | Mole D Boat Ramp CUMULATIVE ASSESSMENT | ENVIRONMENTALLY AND ECONOMICALLY SUPERIOR ALTERNATIVE – Mole D is the superior location and represents the most balanced compromise of capacity, impacts and economic viability. A Mole D location has the least impact on long standing recreational uses in the harbor. The turn basin is the safest location from a maneuvering and boat traffic perspective. Mole D boat ramp would be the shortest transit to harbor mouth and is less surge than Mole C. And Mole D is the only location with adequate parking space. Mole D represents the least traffic impact as well. Economically, the site is available with no lease buy out at end of Samba current short term lease. No cost to retain current boat hoist. Solution best preserves views from Czuleger Park.<br><br>Before CenterCal project, in 2007 combined City staff, Harbor Commission and Harbor Boater representatives selected Mole D as best site in Harbor for a boat ramp. Original harbor boat ramp was located at Mole D. |

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| EX-1 | Exclusivity | Stated objective of development is to attract more affluent customers. Impact to lower cost uses reduces availability and desirability of harbor/pier area. | SIGNIFICANT – Project marketing states it seeks to attract higher income visitors. The project negatively impacts the uses that have the most regional draw. Exclusionary parking exacerbates the situation. MITIGATION – re balance project to emphasize enhance and increase uses that cater to all income levels. |
| TR-1 | Traffic | Traffic analysis not provided | The public cannot complete traffic assessment until requested analyses are provided. |
| TR-2 | Traffic | Traffic analysis ignores infrastructure constraints. Under predicts impacts | SIGNIFICANT – the roads in the project area cannot handle the projected traffic increases despite EIR claims to the contrary. Evidence provided demonstrates conditions today exceed those projected after project completion.<br><br>MITIGATION- reduce project, improve infrastructure, or adjust mix of uses to eliminate impacts. |

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| TR-3 | Traffic | Lack of parking exacerbates traffic impacts | SIGNIFICANT – The project does not include sufficient parking for the proposed uses. As we experience on summer weekend at the harbor and the beach, this increases traffic as visitors circle parking areas and finally move into neighborhoods to find parking. This impact is not evaluated in the EIR, yet there is ample evidence and testimony that it happens today.<br><br>MITIGATION – provide adequate parking. Define offsite parking for non-coastal dependent uses.. Or downsize the development. |
| MS-1 | Massing and Scale | Massing and scale exceeds that of harbor and surrounding uses. Creates a virtual wall between the public and the harbor. | SIGNIFICANT - impacts desirability of bike track and area in general. Violate zoning. MITIGATION – scale back and better spread development between harbor and AES site. Moving parking structure offsite. |
| VI - 1 | View Impacts | Massing and density of development along Harbor Drive create a virtual wall of development drastically limiting views from Harbor Drive | SIGNIFICANT – more than 85% of current views blocked. More if you include landscaping.<br><br>MITIGATION – decrease harbor-side development. Increase width of view corridors substantially. |

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| CI-1 | Cumulative Impacts | City still refuses to assess cumulative impacts which result in understated impacts | SIGNIFICANT – City has failed to address cumulative impacts described by multiple parties including the City of Hermosa Beach. Foreseeable projects are ignored and instead regional growth numbers defined over a large area are applied to the project without regard to reasonableness. This invalid practice artificially underrepresents cumulative impacts to the public.<br><br>MITIGATION – city reaccomplish assessments including foreseeable projects identified by multiple. Entities. |
| VI-2 | View Impacts | Market Hall and hotel area development block substantial amount of views from Czuleger Park particularly mid and lower Czuleger Park. | SUBSTANTIAL - EIR does not assess view impacts from majority of park.<br><br>MITIGATION – reduce size of market hall and hotel area development. Or move market hall and hotel area development to reopen views. |

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| BP-1 | Bike path | Bike path solution dangerous | HAZARDOUS SUBSTANTIAL – Proposed bike path adds three street crossing for all bicyclists in both directions. Does not connect with Harbor Drive Bike Track. Design adds several busy and hazardous intersection with parking structure entrances and exits.<br><br>MITIGATION – redesign to west side of new road. Address each parking structure exit crossing. |
| BP-2 | Bike Path | Shared use dangerous | HAZARDOUS SUBSTANTIAL – EIR still pretends it is safe to commingle pedestrian traffic and bike traffic so they can claim increased accessibility. Yet the current pier area crossing and pier areas at Hermosa and Manhattan require bicyclists to walk during peak periods. Bike peaks will occur at pedestrian peaks in shopping area precluding any substantive bike utilization.<br><br>MITIGATION – separate bike traffic from pedestrian traffic in shopping areas. |

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| LC-1 | Legal Compliance | Project violate numerous state and local laws and requirements | SUBSTANTIAL – multiple violations of Coastal Act, Redondo Beach Local Coastal Program and Municipal Code.<br><br>MITIGATION – redesign project to better balance coastal dependent uses with general commercial uses. See recommended project alternative. |

## DEVELOPMENT CAP ASSESSMENT

The City's response and interpretation of the development cap defined in the zoning is a convenient interpretation that supports their desired solution but is not well based on key factors related to establishment of this zoning and the specific terms used. In the zoning that was put before the voters, the city used two clear and distinct terms. Whenever they were referring to floor area ratio for development the city used the specific term "floor area, gross" or "gross floor area". And floor area gross is clearly defined elsewhere in the zoning code (though that part of the code was never put in front of the voters) to exclude parking. However, wherever the city referred to the total development cap for the CC zoned properties, it repeatedly used the term "floor area". City staff never created a definition for this term. Nor was this term described to the voters. Because this zoning was established by a vote of the people of Redondo, it is the understanding and interpretation of the voters when they voted on the zoning that matters, rather than some interpretation by planning staff years later.

Since there was no definition of "floor area" in any material before the voter (including the ballot materials and in the campaign literature) and the city distinctly and exclusively used "floor area, gross" or "gross floor area" elsewhere in the zoning before the voters, it is only natural for the voter to conclude that all additional "cumulative development" would be included in the development cap. Absent a specific definition it is unreasonable to conclude the public would

think the advertised development cap would exclude parking. That would mean the public voted to allow the city an unlimited amount of parking structure development. That is not a reasonable conclusion. The assertion that the general public did not believe that the zoning development cap did not apply to parking structures is evidenced by the vast majority of public comments that specifically take issue with new parking structure. If the city meant the development cap did not include parking structures, why did the city not use the term "gross floor area" or "floor area, gross" as they do so many other places in the zoning?. If the city meant for the development cap to use it should have used their defined term "floor area, gross." The City did not. Yet, in the same zoning change, the city repeatedly uses "floor area, gross" elsewhere.

The ballot text chosen by the city also provides an indicator of what the residents thought they were voting for. The ballot language for Measure G asked: "Shall the Coastal Land Use Plan and the Zoning Ordinance for the Coastal Zone for the AES Power Plant, the Catalina Avenue corridor and the Harbor/Pier areas of the City of Redondo Beach be amended to provide for major changes in existing policies and development standards including: affirming Coastal Commission recommendations, **limiting total development**, height limitations, **floor area ratio limitations**, permitting parks on the AES site and gaining local authority to issue coastal development authority." This question in the ballot clearly separates floor area limitations (which use floor area, gross) from total development limits. It is unreasonable to conclude that the residents interpreted "limiting total development" to exclude parking structures.

The City cites an example of questions during the deliberations of the Harbor Commission on the Measure G zoning, but it mischaracterizes the question. The question in that case was whether parking is included in Floor Area Ratio calculations. That answer is clearly "no". The question was not whether parking structures were included in the 400,000 sq ft cumulative development cap. City staff then opines that figures given out for Shade Hotel did not include the floor area related to parking. Firstly, the Shade Hotel does not have parking as part of its structure. Parking is surface parking and offsite parking. Secondly, even if it did at the time, the cap was so far away from being "filled" the public did not pay attention. Clearly, the Shade Hotel

would be below the cap. So the fact that staff "got away" with their interpretation in this case is hardly evidence of what the public understood when they voted for the current zoning language.

## HUMAN POWERED WATER VESSEL ACCESS

1. The FEIR continues to ignore the impacts of the project parking configuration on the accessibility for the growing number of people who use the harbor to launch stand-up paddleboards (SUPs) and kayaks.

2. GROWING NUMBER OF SUP AND KAYAK PARTICIPANTS. Both SUP and kayak fishing are growing sports and more and more people participate in these activities. These activities are especially popular on summer weekends, but are also popular on weekdays. The times of peak use vary by type of participant. During the weekday, mornings and right after work hours represent peak usage. During weekends users are spread throughout the day. In the morning and evening kayak fishermen launch in greater numbers. SUP'ers who SUP for a workout generally launch early on weekends to take advantage of calm seas. Families, recreational users, and yoga SUP'ers launch midday as the air temperature warms up. While the comments to the FEIR chastise BBR for not supplying numbers, the public does not have the resources to collect this data. However, the city is well award of the growth of SUP'ing and kayak fishing based on city meetings on SUP harbor traffic conflicts, SUP rental concessions, and on the Palos Verdes peninsula MLPA proceedings. In fact recent minutes from Harbor Commission meeting document that both city staff and Harbor Commissioners are aware of the growth of SUPing in the harbor. If the city wants to accurately scope the number of SUP'ers and kayakers using the current hand launch boat ramp, the City should have characterized the weekday and weekend traffic. BBR has previously provided industry statistics that show the year over year continued participation growth in the SUP sport. But the FEIR response demonstrates the city did not consider or accept this evidence.

3. PARKING AND ACCESS A DETERRENT. While businesses like Tarsans provide new SUP'ers access to the harbor, those who own their own SUP's have limited launch options in the harbor. If an SUP'er also leases a boat slip, he or she can launch in their marina. And some businesses have provided limited private SUP storage for a monthly fee. But the vast majority have to use the current hand launch boat ramp. Today, these users can drive up to the hand launch boat ramp, drop off their equipment and park within sight of their equipment. The access road configuration is isolated from other harbor uses and precludes anyone stealing the dropped off equipment without the owner seeing the activity. Ample parking is available at the end of the access road on surface level parking. Because of the close proximity, many just carry their equipment from the parking spot to the launch point.

   The FEIR shows a configuration that represents a major deterrent to SUP'ers and kayakers. The option of parking your vehicle and carrying your equipment to the launch point is eliminated. There are a limited number of nearby surface level parking spaces. And the CUP has not reserved these spaces for these recreational uses. Therefore it is reasonable to conclude that users would be forced to park in parking structures. The height of SUV's with an SUP or kayak on top would likely preclude the ability to even enter the parking structure. But even if a user could, they would then have to cart their equipment through the parking structure as elevators cannot hold standard SUP's or kayaks. Parking structures are not designed for people to walk down the ramps. It would be dangerous for users as there are many blind spots and drivers are preoccupied looking for an available parking spot. The length of the boards and kayaks would also risk regular damage to vehicles and/or the SUP or kayak, especially carbon fiber SUP's and kayaks. Just the distance added by negotiating the levels of the parking structure represents a major deterrent. But then, once free of the parking structure, the user would then have to navigate through two rows of shops and restaurants, cross the new street, and multiple pedestrian/bike paths to get to the reconfigured Seaside Lagoon. Then amidst all the

people and bike traffic on the pedestrian/bike esplanade, the user would have to negotiate two 90 degree turns with equipment over 9 feet long and some 14 feet or longer and go down a set of stairs to reach the beach and launch. This represents a significant risk of injury to people and damage to property, landscaping and kayaks/SUP's.

The FEIR attempts to remedy this by providing a drop off point and some lock boxes. But the FEIR fails to describe the dimension of these lockboxes or how they would work. Are they lockers with a door and key? Lockers that would fit the length of SUP's and kayaks and the height of their skegs, decks and bow and stern rocker, would be huge. How many would be required? If it is not a locker, it would be difficult to secure paddles, PFD's, fishing gear, and other equipment. How do the users get the locks and keys? What happens if someone "camps" in a locker – preventing its use by other? How much does a locker cost? . No other harbor has a locker system for users who come to launch their SUP or kayak. Without proper definition of this solution, it is impossible to evaluate its viability as a realistic solution. And without characterizing the traffic, how does the city determine how many lockers are required? Neither the CUP nor the FEIR define the number of lockers.

Even assuming the city could create and manage such a complex system, the process would deter users. It would take on the order of 10 minutes to offload a vehicle; carry all the equipment to a locker negotiating people who are shopping, dining, walking and biking; carefully load all the equipment into the locker to preclude damage to the equipment; and returning to your vehicle. The same would be true on the return trip. So the simple act of loading and offloading one's equipment from their vehicle would take 20 minutes. But now the user must find parking in the parking structure. Based on the limited parking provided (see parking section) it is likely the user would have to search the few ground level parking spots, then try the harbor parking structure, then try the other parking structures further south. It is easily foreseeable that on a busy weekend this process and walking back to the launch point would take half an hour or more. Even more frustrating is that the user may not find any parking space – totally wasting their

time- or have to pay even more for valet parking.

This represents a significant access issue that is far, far worse than the situation today. The only reasonable conclusion is that the plan described in the FEIR would be a significant impact and would serve as a deterrent to users.

4. SHARED SPACE WITH SEASIDE LAGOON USERS – Navigating beach area with playing toddlers is a danger. Creating a safe lane for departing and returning both on land and in water would significantly reduce parkland and water area usable to Seaside Lagoon visitors. The beach increases the potential for sea lion interaction (see Sea Lion section). Also, the FEIR describes the Seaside Lagoon being used for a significant number of events. Events would preclude or significantly impact the ability of SUP'ers and kayakers to access the launch point. This situation does not exist today because the launch area and access are physically separated from the Seaside Lagoon park area.

5. COMBINATION WITH THE TRAILER BOAT LAUNCH RAMP – City staff contemplate launching kayaks and SUP's off the proposed boat ramp on Mole B. First off, this solution already suffers from insufficient parking (see Boat Ramp section). But that aside, the ramp would have to have a separate floating dock for launching and retrieving SUP's and kayaks. The floating dock height for boats is too high for safely launching kayaks. Floating docks designed for kayak and SUP launching are closer to the water to facility save boarding and offloading. Launching by walking down the concrete ramp itself is dangerous as the ramps quickly become too slick for safe footing. Also, SUP's and kayaks "beaching" or launching from a concrete ramp would be easily damaged. Launching beside a trailer boat ramp is dangerous. The proximity to task saturated boaters trying to launch or retrieve their vessel is dangerous. Kayakers and kneeling beginner SUPers, in particular, sit close to the water and may not be visible. Boaters waiting for a chance to return will jockey for position in waters just outside the launch

creating further risk of collision. Jet skis are known for their poor handling at low speeds. And in the case of Mole B, the blind spot created by the Galveston wall combined with boat ramp traffic and normal Basin 1 traffic all represent significant danger to any kayaker or SUPer using the facility. This is a deterrent and hazard in general but especially to families who want to kayak or SUP together.

6. SUMMARY – The following table summarizes the assessment of attributes of the human powered watercraft launch solutions proposed in the FEIR. In summary, the solutions proposed increase hazards and are a significant deterrent to SUP'ers and kayakers. Compared to the situation today, the FEIR proposals represent a SIGNIFICANT IMPACT to use of the harbor for SUP'ers, kayakers, and users of other types of human powered watercraft.

| Solution Attribute | Assessment | Comparison to current situation |
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| **Park in parking structure** | Deterrent – distance, time, potential lack of parking or use of valet. No parking demand assessed for SUP and kayak users. | Significant impact |
| **SUP/Kayak Locker** | Unproven, lack of detail, number not specified, dubious viability, deterrent | Significant impact |
| **Access** | Dangerous – length of SUPs/ kayaks, negotiating roads, walkways, 90 degree turns and stairs risks injury to people and damage to equipment and facilities.<br><br>Awkward to maneuver.<br><br>Deterrent. | Significant impact |

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| **Shared Beach** | Potential hazard to toddlers.<br>Reduction in usable beach and water area.<br>Increased risk of sea lion interaction.<br>Events will inhibit or prevent access.<br>Deterrent. | Significant Impact |
| **Combination with trailer boat ramp** | Insufficient parking.<br>Dangerous solution.<br>Deterrent. | Significant Impact |

## SEASIDE LAGOON

The FEIR continues to ignore city documents that define the unique attraction of the current configuration of Seaside Lagoon and the deterrents and impacts represented by the proposed configuration.

According to a staff report dated November 20, 2007, entitled "Seaside lagoon Operation and Facility Planning" city staff meetings with Coastal Commission staff concluded that "any replacement facility must include a water recreation amenity and be regional-serving." The current design reduces access and desirability for regional visitors.

1. UNIQUE ATTRACTION FEATURES ELIMINATED - BBR has previous provided references to City documents that highlight the unique attributes of the current Seaside Lagoon. The sand bottomed salt water pool combined with the sand beach, play fountains, and sliding boards provide a toddler friendly environment – constant water depth with roped in wading areas, lifeguards surrounding all sides of the pool, play fountains in the pool for kids to play in, fenced-in safe environment, concession window for food from Ruby's at the outer boundary of the park. The fenced in park provides

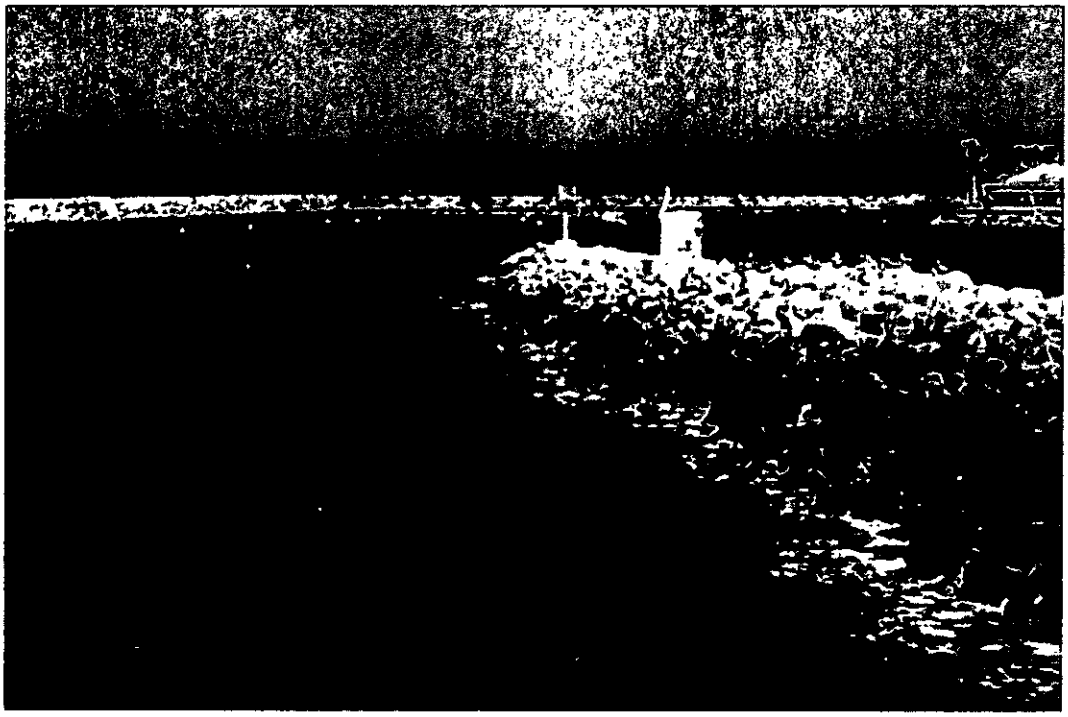
security for children, keeps children from wandering off, limits stranger access to children, and allows control for events without impacting use of the hand launch boat ramp.

In addition to previously submitted evidence of the unique attributes of Seaside Lagoon, a November 20,2007 City Staff Administrative Report entitled "Seaside Lagoon Operation and Facility Planning" calls the Lagoon a "uniquely designed recreational aquatic park".

The proposed solution eliminates these attributes. City staff have admitted the childrens' day camps will not likely survive the reconfiguration. Tidal changes preclude the definition of a safe wading area for toddlers. Access for lifeguards is limited to one side of the swim feature. Toddlers playing next to and around breakwater rocks bordering the beach and swim area creates new risks and hazards. The elimination of fencing prevents the use for private parties and creates interference between public events and the launching of SUP's and kayaks.

***The elimination of the very elements that make Seaside Lagoon unique would reduce the attractiveness to current users. It is reasonable to conclude that attendance would drop dramatically.***

2. HARBOR WATER QUALITY – The current Seaside Lagoon is treated with chlorine and is designed to meet public pool standards, filtering total water volume 6x per day, and tested to meet public pool standards. The city failed to perform water quality testing of the harbor in the proposed Seaside Lagoon area. Instead the city relied on data from water testing south of the pier. BBR and the City provided evidence that these waters fail water quality testing over 25% of the time in both dry and wet weather conditions. The most recent Heal the Bay Beach Report Card rated these waters an F and it made the "Beach Bummer" list. The city states this is because of a specific outflow condition from the Hyperion plant, but Heal the Bay clearly states this as a possible cause. There is no




conclusive analysis to support this conclusion. In fact, as submitted previously, these waters have failed in previous years without the referenced outfall condition.

The City responded to DEIR comments from BBR by performing water quality testing on a single day in April at a point near the proposed swim area. During this time, ocean waters in the vicinity also passed water quality testing, yet we know they fail 25% of the time. Clearly a single data point on a single day is insufficient to conclude or even speculate the prevailing water quality of the harbor swim location. Wind conditions and direction, water temperature, sea state, boating activity, amount of daylight, air temperature, presence of sea lions – all these variables affect pathogenic activities in harbor waters. It would take several years of data to be able to accurately assess the suitability of harbor waters for toddlers and swimmers. The City has known of its plan to move the swim feature to harbor waters for years, yet they only did a single water quality test on a single day. Toddlers are especially susceptible to water born pathogens. Any parent concerned about the health of their children would be deterred by the untreated

harbor waters compared to the treated waters of the current Seaside Lagoon.

The city and CenterCal advertise that the proposed swim area will be "flushed" by tidal action every 48 hours. Firstly, that hardly compares to treated waters that are recirculated, filtered and chlorinated six times per day. Secondly, that "flushing" analysis assumes a non-biological contaminant released in the harbor that is not present outside the harbor. Biological pathogens breed. So the contaminant is not a fixed amount in this case. In the right conditions pathogens multiply rapidly. And if the ocean waters contain these same pathogens no amount of tidal action would result in a change in pathogen contamination of the swim area. City provided data shows the waters outside the harbor suffer from poor water quality over 25% of the time. Data previously provided by BBR shows water quality north of the harbor failing 25% of the time. Again these exceedances occurred in both wet and dry weather conditions. The city and EIR have not explained how ocean water that fails water quality tests would be able to "flush" clean the proposed swim area.

While the city uses the explanation that preventing runoff from the harbor parking area would reduce pollution, that would only affect wet season events, when it is unlikley the area would be used by swimmers anyway. The city ignores other sources of contamination: boating activities; sea lion, birds and sea life defecating, and garbage being blown in by the prevailing winds. The city contradicts itself, it explains that the large number of birds at the pier may affect the water quality failures just south of the pier (the test data originally provided by the city), but they ignore that the harbor breakwalls attract many more birds. In fact many birds roost on the breakwaters. And tides and rains wash that excrement into the harbor waters. The city is silent on the failures north of the harbor. The city does try to compare our harbor with Dana Point that generally has better water quality than Cabrillo or MDR internal beaches, but Dana Points Baby Beach is much bigger, much more open and is not in close proximity to main channel boating traffic, a fishing pier, and a sea lion barge. In fact Heal the Bay advises families to avoid beaches in enclosed waters including harbors.

*Birds roosting on breakwall. Guano evident on breakwall rocks. Rains, surge, waves wash guano into harbor waters.*

The city has made statements about the porosity of the harbor breakwall helping the cleansing action, but it is just as likely the rocks are a source of pathogens that would decrease water quality. In the absence of water quality testing, the city's conclusion is merely conjecture.

It is interesting to note that the one day of testing done by the City actually shows harbor waters near the harbor mouth are much more healthy than waters at the proposed swimming area. There Total Dissolved Solids and Coliform/eColi count at the proposed swim area is more than 2.5x that of the waters closer to the harbor mouth. Fecal coliform testing was invalid, according to the lab report because too much time had lapsed from sampling to testing.

***3.***

Proposed mitigation – the City states it will monitor water quality of the proposed swim feature. But the CUP only requires testing once per month during the summer and quarterly in the winter. The limited frequency of this testing does not afford any protection to the public. Ocean waters are tested weekly.. **Given the absence of historical data, this testing requirement is inadequate and negligent.**

***The city has known its plan to open Seaside Lagoon for years, but failed to perform any water quality testing until BBR commented on the DEIR. The city cannot demonstrate that the proposed solution is as safe as the current Seaside Lagoon conditions because it failed to do the proper testing and analysis. The city offers speculation not evidence. The city's proposed water quality testing is inadequate and negligent given the lack of data on harbor water quality.***

4. YEAR ROUND OPENING – The City advertises that the opening of the Seaside Lagoon year round would increase the use of the park. This conclusion is not supported by evidence. BBR previously provided City provided attendance data for Seaside Lagoon. The data clearly showed a dramatic drop off in attendance at the beginning and end of the season. Dropping air temperatures, increases in mid day wind velocity, lower water temperatures and school activities all contribute to reduced usage during the fall, winter, and spring months. The city opines that parents may take their kids to wade during warm offseason days. This ignores the demands of the school year and deterrent represented by cold water temps and offseason wind velocities. The City also concludes parents may take their kids to just play on the beach, but they can do this today on any beach in the SouthBay. The city even contradicts itself... In its response to the harbor water quality issue the city responds " lagoon users are less likely to engage in swimming in wet winter months." If the Seaside Lagoon were a big attraction in the off season, the city could open it year round or for extended season. The fact that the city has not extended the Seaside Lagoon season demonstrates that off season demand is low. Attempts to open the park for attractions such as ice skating have failed as well. There is no evidence that opening the Seaside Lagoon year round would make up for the lack of amenities that make the Seaside Lagoon unique and attractive to nearly 100,000 total users per year today. In fact, **the City's CUP requirement for water quality testing demonstrates the city believes use in the non-summer season will be extremely limited – the city only requires testing once per quarter in the off season.**

As for SUP'er and kayaker access, these users already have year round access. When the small craft hand launch dock is removed for repair in the winter, SUPers and Kayakers use the asphalt path into the water in the immediate vicinity of the hand launch boat ramp or they use the boat hoist dock to launch. Opening up Seaside Lagoon year round does not represent an increase in access for SUPers/kayakers because they have year

round access today. ***As discussed in the Human Powered Watercraft section, the proposed project will actually have a detrimental and significant impact to access, safety and use by SUP'ers and kayakers.***

5. REDUCTION IN USABLE PARK SIZE – The proposed reconfiguration of Seaside Lagoon dramatically reduces the usable public open space in the park. One third of the current park footprint is paved over with a new access road for the CenterCal development, a few surface level parking spaces, the pedestrian esplanade, and new structures. The new road and parking represent a zoning violation unless the road and parking are dedicated to the park uses. Likewise the loss in space to "concessions" is a violation unless those concessions are primarily dedicated to serve the park uses. Added to this hard reduction is the impact of tides. The usable area of the park will be defined by the high tide line. Sand below this level will remain wet and be undesirable for a family to use as their spot on the beach. BBR provided city provided data on Seaside Lagoon attendance. This showed peak weeks average over 1300 Seaside Lagoon guests per day. While the city failed to produced daily use data, weekend use on these peak weeks would clearly surpass this number of guests. ***The reduction in usable grass and beach space significantly impacts the ability of the park to serve the current peak number of families and reduces the attractiveness to current users. The only reasonable conclusion is that the use of Seaside Lagoon by families with toddlers and other children will decrease in the proposed configuration.***

   In fact, history shows that the city has been reducing the side of Seaside Lagoon for quite some time. An August 19, 2003 Staff Report entitled "Approval of New Lead and All Related Documents Between the City of Redondo Beach and MCC Redondo Beach II LLC for the Leashold at Redondo Beach Marina" clearly shows that the city allocated 2.5 acres for parking for Seaside Lagoon Park:

> *"In exchange for operating the hoist, Redondo Beach Marina also operates the 2 ½ acre Seaside Lagoon parking lot, collects the revenues and absorbs the expenditures associated with the lot and the hoist."*

The lease agreement included with the staff report clearly states:

> *"C. Adjacent to the Leased Premises is a parcel of land (the "Adjacent Land") that is used for parking, including parking for the boat hoist and the recreational area known as the "Seaside Lagoon."*

In fact, the agreement demonstrates that even back in 2003, the city realized parking would get saturated in the Harbor area:

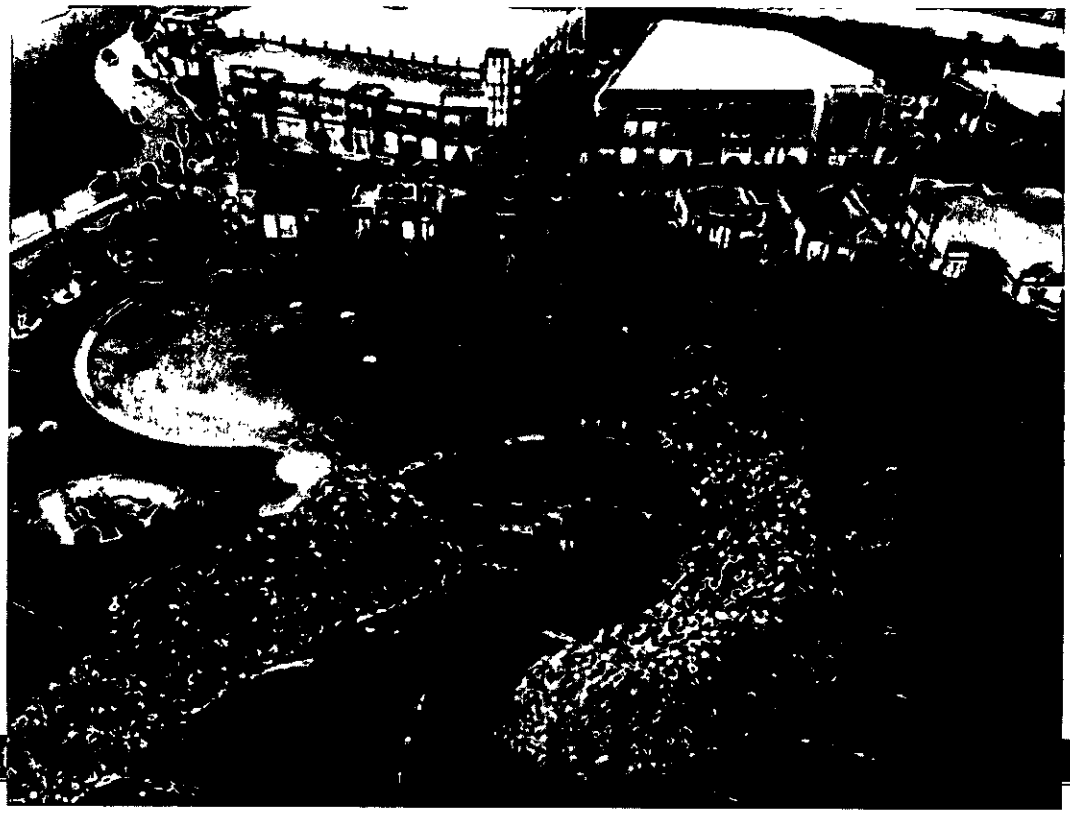
> *"In order to provide additional parking for Seaside Lagoon, MCC will cooperate with the City in developing a plan to use the Triton Oil site as overflow parking for Seaside Lagoon and other nearby uses."*

This demonstrates that the parking for Seaside Lagoon was specifically setaside outside the park security fence. Thus the paving over of the usable park area in the proposed plan represents a much more substantive decrease in the land area set aside for this recreational use than just the park boundary. **The actual loss in total park area, parking AND usable public open space is closer to 3.5 acres out of a total of 5.5 acres – a 64% loss in space allocated to Seaside Lagoon.** In fact, it shows

that the city recognized the 2.5 acres of parking was insufficient and that they were exploring overflow parking nearby.

The City Staff report on future options for the Seaside Lagoon dated November 20, 2007 entitled "Seaside Lagoon Operation and Facility Planning" defined "decision guideposts" consistent with state law and city zoning. "Rehabilitated or new facilities should be planned within an overall property size similar to that of existing facilities." "Rehabilitated or new facilities should provide equal or more aggregate recreational value."

6. USABLE WATER AREA - Today Seaside Lagoon is predominantly an attraction for families with children. Adults primarily use the waters to play with their children. The Seaside Lagoon is not designed as a lap pool. Toddlers are confined to wading areas that are consistently the same depth and are clearly marked by ropes and floats. Older children with the ability to swim can play in the deeper waters and use the water slides.



BBR previously provided an analysis of the usable water area assuming swimming would be prohibited outside the small breakwater protecting this area of the harbor from direct wave action. The city says the BBR analysis did not include the width of the breakwall that would be eliminate, however, BBR did include this added area in the analysis.

The reconfigured swim area described in the DEIR cannot define a safe wading are for toddlers due to changing tides and surge conditions. And the proximity of breakwater rocks presents an additional hazard to toddlers. While toddlers today enjoy wading depths over more than 3/4ths of the perimeter of the current pool, in the proposed configuration, toddlers could only access one side of the swim area safely. If an area is roped off for SUP/kayak access to provide a safe demarcation from toddlers, this usable swim area is reduced even further. The elimination of slides and interactive water fountains reduces the attractiveness of the swim area to both toddlers and older children. Indeed, CenterCal's model of their development shows how small the wading actually would be and the proximity to dangerous breakwall rocks. The sandy beach area is approximately the same size as the current Lagoon pool. Clearly the wading area and swim area are much reduced in area and volume.

While adult swimmers may choose to swim in the harbor from this point, swimming outside the small enclosing breakwater represents a real hazard to the swimmer. Swimmers are not very visible to boaters and outside the small breakwater, the swimmer will be in well used navigable waterways. We find it it doubtful the Harbor Patrol would allow any appreciable swim area. It would be far, far safer for an adult swimmer wanting to swim for a workout to enter off a beach and swim just outside the surf line. That is exactly what open water swimmers do today. And the city assessment even admits this. It is extremely unlikely adults who frequently swim in open waters for their work out would change their behavior and swim to and from the Seaside Lagoon. And if any do, they will not be great in number.

Therefore, it is reasonable to conclude any swimmers would be confined to the small enclosing breakwater. Tidal action will significantly impact the usable depth of even this small area. As the image that follows demonstrates, this depth will also be subject to silting. The current hand launch boat ramp area has been silting in for years. On low tides people can now walk to the hand launch boat ramp from the shore. And while the city claims otherwise surge and rain runoff will move beach sand into the swim area. There is no feature designed into the project to prevent this erosion over time. The proposed beach is heavily sloped. When it rains or when harbor waters surge onto the beach, the beach sands will erode into the swim area. So absent dredging the small swim area will only grow smaller and smaller with each year.

***The design of the proposed swim area reduces the usable area for those who use the current Seaside Lagoon the most and reduces its attractiveness due to loss of play amenities and increase in hazards. It is extremely unlikely that the loss of these users would be replaced by open water swimmers. The***

***only reasonable conclusion is that the design proposed will decrease the use of the swim feature.***

7. SUMMARY – The following table summarizes the proposed attribute of the Seaside Lagoon Reconfiguration, the assessment of that attribute, and the comparison to the current configuration. The only reasonable conclusion is thatUn the proposed reconfiguration will reduce the family use of this area by eliminating the very attributes that make the current Seaside Lagoon unique and attractive to families with small kids and by reducing its usable size overall. Furthermore, the city has presented no evidence that the harbor waters are safe for toddlers and adults during the peak summer months. Indeed the only data presented in this process. would reasonably force the conclusion that the facility would be closed over 25% of the time . While the new configuration may provide a spot for CenterCal to host its promotional activities, the residents of California will lose a unique and well attended regional family attraction that provides a safe stepping stone for kids to migrate to recreation in beach waters.

| Attribute | Assessment | Comparison to Current Conditions |
|---|---|---|
| Unique attributes eliminated | Elimination of sand bottomed salt water pool, fountains and slides decreases attractiveness.<br><br>Elimination of fence reduces attractiveness due to risks of children wandering off and more exposure to strangers.<br><br>Deterrent | Significant impact |

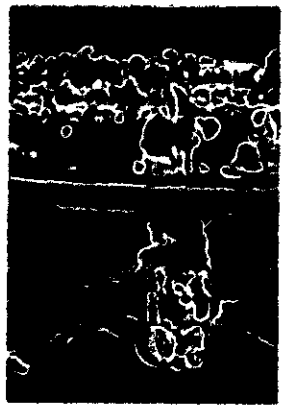
| | | |
|---|---|---|
| **Harbor water quality is unknown** | The city has provided no evidence that harbor waters are safe to swim in. One day of testing on an off season day is insufficient to draw conclusions. Data provided by the city only supports conclusion that feature would closed 25% or more of the time.<br><br>Deterrent | Water quality is known. Water is treated. Water volume is circulated 6x per day.<br><br>Significant Impact |
| **Year round opening** | No increase in access for SUP/Kayak users<br>Evidence shows little swimming demand on offseason. | Year round access currently not provided due to lack of demand.. |
| **Reduction is usable park size** | Usable land area size substantially reduced due to development and tidal changes.<br><br>Deterrent | Significant impact.<br>Violation of zoning. |
| **Reduction in usable water area** | Toddler wading area variable and reduced substantially<br><br>Hazards increased by tidal depth changes, surge, and exposure to sea wall and breakwater rocks.<br><br>Silting and erosion will further reduce swim area without dredging.<br><br>Deterrent | Significant impact. |

The Waterfront's treatment of Seaside Lagoon violates the will of voters. As shown zoning text would have voters thinking they voted to protect, enhance and expand Seaside Lagoon. And

campaign material by Measure G proponents hammered this point home:

Redondo Beach Voters
Protect Seaside Lagoon Forever
Yes on G

Supported By:
Save Our Seaside.com • Redondo Beach Un[illegible].com
Redondo Moms For Measure G.com • Green For Redondo.com
Redondo Beach Firefighters Association • Redondo Beach Police Officers Association



Yes For Protecting Seaside Lagoon From Potential Development

Measure G Validates Seaside Lagoon Park Zoning

Fact: Yes on G locks in place Public Park Zoning for 3 ½ acres of primo oceanfront land that can never be up-zoned for private development without another vote of the people

## WATERFRONT PARKING

The city response to waterfront parking concerns basically attempt to explain away their current plan rather than address the substantiated concerns submitted by BBR and others.

1. SIZE AND LOCATION OF PARKING STRUCTURES – The city attempts to justify location of the parking structure at Beryl and Harbor. It fails to address the configuration and location that force the new road and surface parking to pave over a substantial portion of Seaside Lagoon Park. ***Relocation and/or reconfiguration could have preserved the park in its entirety.***

2. PARKING FOR RECREATIONAL USERS – The city attempts to explain away why recreational uses are not included in the parking demand numbers. Primarily, the city says the parking demand numbers for other uses would account for the parking needed by recreational users. This is a false conclusion. Firstly, not all recreational users patronize the other uses. People going to Seaside Lagoon today regularly pack their lunches and even the city admits in her EIR text that they bring their own coolers. People coming in after work to get in an SUP workout do not frequently stop by and get a drink at another harbor business. Secondly, if anything, any recreational users that frequent the other businesses, should INCREASE the parking required for those businesses. But this approach is just as faulty. Thirdly the number of people per vehicle is dependent on the primary purpose for the visit, not a secondary or tertiary purpose.

   ***The parking demand be reaccomplished to include recreational uses. Parking should be based on the primary purpose for the visit. And then some of that may be decremented based on some evaluation of a dual purpose visit***

   Most SUP'ers working out after work will come one per vehicle. Seaside Lagoon users

would have a higher per car factor. A November 20, 2007 staff report entitled " Seaside Lagoon Operation and Facility Planning" states:

*"Parking for the facility is available in an adjacent 2.25 acre lot that is owned by the City, but operated privately by the Redondo Beach Marina Leaseholder, and contains 207 spaces for cars...."*

Previous staff reports cited in the Seaside Lagoon section of this report, shows that the city considered the 2.5 acres east of Seaside Lagoon was allocated as Seaside Lagoon parking.

Likewise the City's lease with MarVentures specified the number of parking spaces for commercial boats and recreational boaters in Basin 3. From the August 19th, 2003 staff report entitled "Approval of a New Lease for Redondo Beach Marina":"

*"MCC would allocate on a non-exclusive basis, 110 parking spaces to maritime operations. (60 for sport fishing, etc. and 50 for slips) as well as space for showers/*

| Parking Generator | x per day | Max (boats) | Peak concurrent | People/car | Concurrent Parking Allocation |
|---|---|---|---|---|---|
| Voyager | 2 | 125 | 120 | 2.5 | 48 |
| Indian | Varies | 24 | 15 | 2 | 8 |
| Betty G | Varies | 10 | 7 | 2 | 4 |
| Highliner | Varies | 10 | 7 | 2 | 4 |
| | | | | | |
| SUP's | | 75 | 25 | 1.25 | 20 |
| Kayakers | | 25 | 12.5 | 1.25 | 10 |
| | | | | | |
| Seaside Lagoon | | 1500 | 750 | 3 | 250 |
| | | | | | |
| Monstad Fishing | | 20 | 20 | 1.5 | 13 |
| Sportfishing Pier Fishing | | 10 | 10 | 1.5 | 7 |
| | | | | | |
| Beach/Other | | 150 | 150 | 4 | 38 |
| Board House | | 15 | 15 | 1.25 | 12 |
| TOTAL: | | 1964 | 1131.5 | | 412 |

*lockers and sport fishing sales."*
These numbers coincide estimates for parking demand for recreational uses that BBR submitted but was never addressed.

.

BBR's numbers should be incremented to account for growth in these activities based on the expected population growth for the region and the growing participation rate for these recreational uses.

The city falsely states that current parking is largely vacant and that only three weekends per year is parking saturated. BBR has provided photographic evidence that parking has a much higher use rate that the city admits. While we agree most weekdays have a lower parking utilization rate, nice weekends throughout the year generate utility rates that are much closer to capacity than indicated by the city. And during summer months nearly every summer weekend results in very high to over capacity parking utilization in the harbor and pier. In fact on social media one resident commented that she had to abort an anniversary dinner at Kinkaids as they spent 40 minutes looking for nearby parking. They got stuck in the parking structure line ups for others looking for parking.

As to access for the recreational uses, the City fails to accurately portray the conditions. It is true that today kayakers and SUP'ers who drop off their equipment at the hand launch boat ramp must park some distance away, but the city fails to assess that the current access road is not a through road. Users can only enter and depart the access road adjacent to the Sportfishing pier. The kayaker/SUPer can see this entrance/exit point at any time while parking. This road is used almost exclusively for users of the small hand launch boat ramp (along with pedestrians, joggers, and bicyclists).. And the equipment is dropped off on the actual dock – it is not in the way of pedestrians, bicyclists and joggers who also use the path for access.

These attributes are not repeated in the CenterCal project. The drop off point is two way

road used by all visitors to the mall. While the owner is off looking for parking, anyone could stop throw the SUP, kayaking and/or fishing equipment on their roof rack or the bed of their truck and make off without the owner ever seeing the crime. And there is the added risk of a kid or other pedestrian tripping over, stepping on or otherwise accidentally or maliciously damaging the equipment. While the EIR discusses a locker system, there is no description as to number, configuration or management of the limited number of lockers. We have previously discussed all the shortcomings of this approach.

Today, recreational users can park immediately adjacent to their intended use. In the EIR project description, users may have to park up to a quarter mile away in a parking structure and have to negotiate streets crossings, pedestrian traffic, bike traffic and shops and restaurants to reach their recreational activity. ***Any reasonable assessment that would conclude the parking configuration represents a significant impact to recreational, coastal dependent uses of the waterfront.***

3. PARKING FOR THE BOAT LAUNCH RAMP – The city continues to use its data on the current boat hoists to justify a ridiculously low number of parking spaces for the new boat ramp. Multiple residents, boater group representatives and fishing group representatives have testified that they do not use the boat hoists for a variety of reasons including the reliance on a hoist operator, limited hours of operation, limited hoist capacity, and vessels that are not made to regularly hoist. If the Coastal Commission felt the hoists were not a deterrent, why do they require a ramp in the first place?

The city continually relies on long term averages to justify its choices. Staff have admitted they know peak uses are much higher. In fact that city has that data to show the fallacy of their justification. Another averaging fallacy the city attempts to use is taking the total number of lanes of boat launch facility and dividing it by the number of launches per day.

While this may be a valid way to justify how many boat ramp lanes you need, the city then twists this data to justify number of parking spaces per ramp. So if there were 10 launches per day in a facility with 10 ramps, the city would erroneously conclude that that only 1 parking space per lane is required. The two are independent variables. The total number of launches not the total number of lanes should be the indicator of parking demand.

Data provided by the city on boat ramp utilization rates show weekend traffic rates throughout the year are significantly higher than the city concludes. It is reasonable to assume that due to a midpoint location between MDR and Cabrillo Boat Ramp, Redondo's boat ramp can expect to attract about a third of the current traffic from each side and add the unserved users who reside in close proximity to King Harbor. In fact, because Redondo is much closer to Catalina, to prime fishing grounds off Palos Verdes and the spectacular views of PV's coastline, Redondo would capture a larger share of MDR traffic. It is also likely that the convenience of a nearby boat launch ramp would incentivize more nearby residents to buy a trailer boat or jet ski, who otherwise would not have due to the distance and traffic to get to Cabrillo or Marina Del Rey. As provided earlier, the boating industry is showing an increase in sales. And finally, the region still is experiencing population growth that has accelerated with the reversal of the economic downturn. When you combine the convenience, the population growth, the boating industry's increased sales and the recover of the economy, it is only prudent to provide more parking to accommodate the foreseeable growth. Instead, the city is providing less than the minimum of the minimum range defined in California Department of Boating and Waterways Guidelines and uses misleading and inaccurate averaging techniques to justify it. And to add insult to injury, they are calling this parking shared with other boating uses that would peak at the same time.

A more appropriate assessment and determination of parking requirements was conducted by Dana Point for their harbor revitalization. Determination of parking was based on peak uses not average. Redondo should do the same.

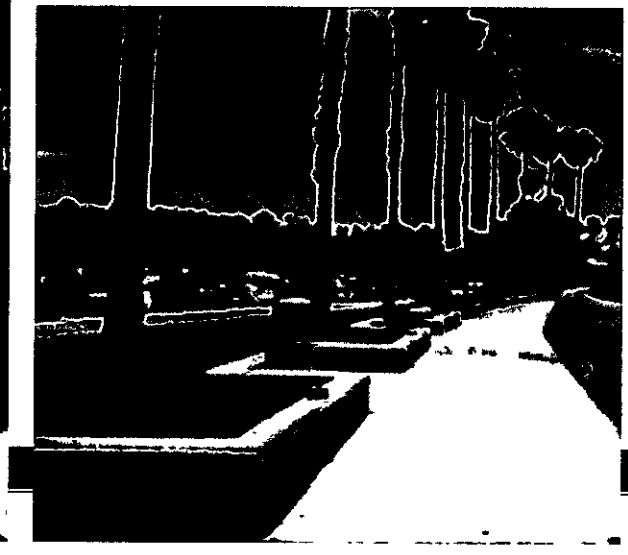
***Currently City zoning requires 67 double length parking spots for the boat hoists. The city kept this in the zoning that went before the voters and the Coastal Commission. To substantial cut that requirement while building a boat ramp that is designed to attract more users is contrary to the goal of installing a boat ramp. As a minimum, the City should require 30 trailer spaces per lane and meet the guidelines for guest parking as well.***

4. TOTAL PARKING FOR THE PROPOSED PROJECT – The city admits that the project does not meet RBMC individual parking standards. It then misleadingly compares to off season weekday utilization statistics. By the city's assessment, nearly every harbor in the US would have an excess of parking spaces. But again BBR previously provided photographic evidence that the parking lot utilization on weekends – even winter weekends exceeds what the city would have us believe in the EIR. So then the city uses ULI data to conveniently declare that a parking deficit has turned into a parking surplus. The city wrongly uses time of day assessments and misapplied them. For example, the city concludes recreational uses do not peak at the same time as other uses. That is not supported by the actual peak uses in our harbor. Recreational uses peak in the hours after work during weekdays and at mid day on weekends. The same peaks of most of the other uses described in the project. The fact of the matter is, if the development is successful, the parking required to serve the commercial uses during summer weekends combined with unaccounted for recreational uses during a summer weekend will more than saturate the parking. We see at or near capacity conditions today on summer weekends. The ULI analysis does not take into account that this is a waterfront. The large number of people who come to the harbor today is evidence that it is the waterfront location, not the commercial development that determines total draw and when that draw peaks. The ULI peak use and shared parking data is not valid for application to the situation at the waterfront.

This project doubles commercial development while only increasing parking by 7%. Unless the proposed development dramatically underperforms, there is no way to reasonably draw the conclusion that the parking provided by the project is sufficient for all uses.. The CUP proposed allows CenterCal to define large blocks of this already limited parking for valet parking, which will only further exacerbate the parking shortage.

The City responds to the comment about the lack of any assessment of recreational parking demand by stating the demand is accounted for by the commercial development. This is a laughable response. The beach area of Redondo experiences overflow conditions every summer weekend. Yet there is not one commercial use on the beach. The fact of the matter is the harbor and its recreational uses would have a substantial demand without any commercial development. But the city fails to attribute a single parking space for any recreational uses.

BBR has previously presented pictorial evidence of harbor and pier parking on non-holiday weekends exceeding City claims of excess parking capacity. Here are additional pictures evidencing the high demand for and utilization of parking without the increased development on non-holiday weekends in May, June, and July:



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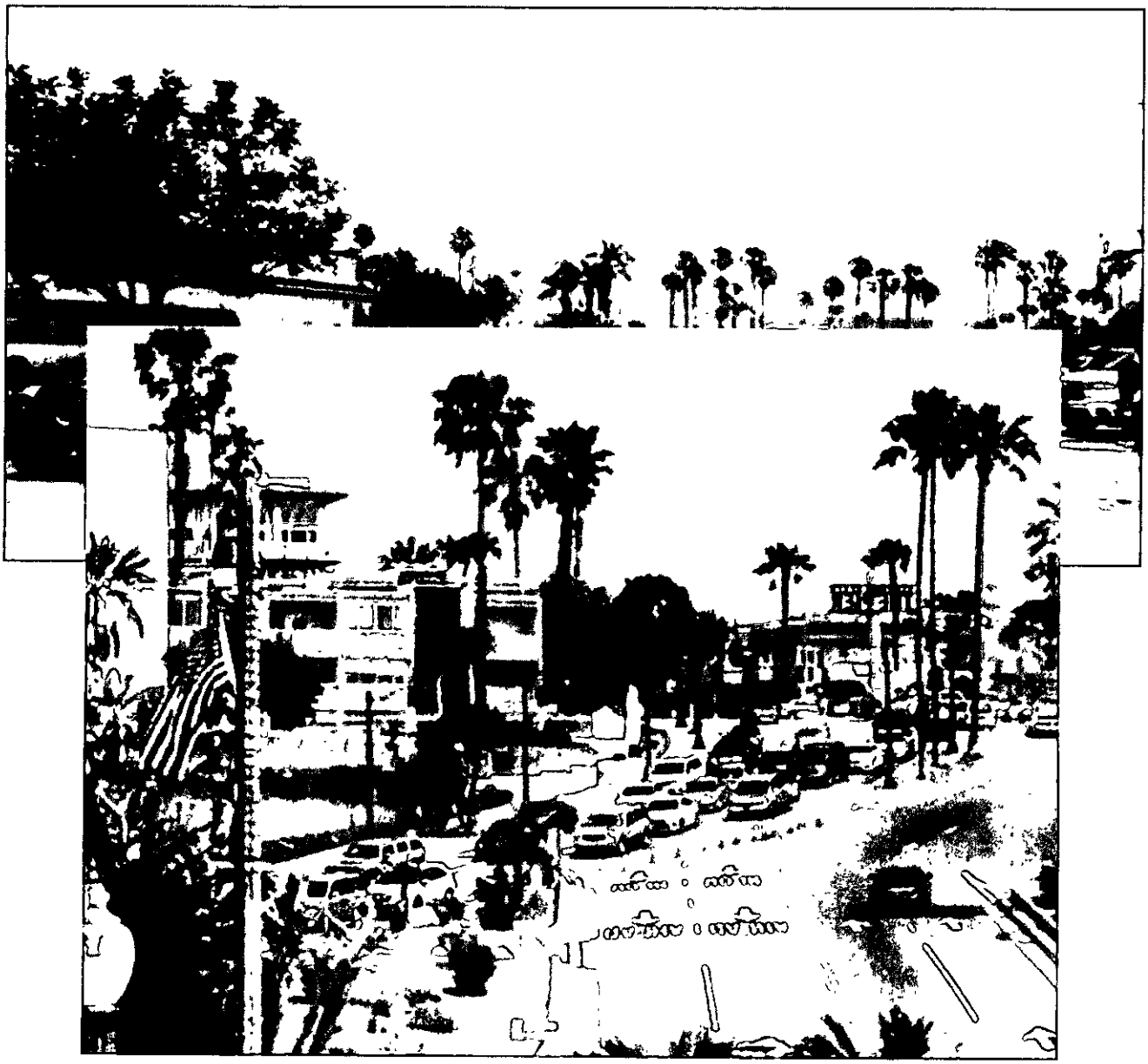


## BOAT RAMP

Th Harbor Commission approved the FEIR, Statement of Overriding Considerations, CUP and other documents without understanding the final configuration, impacts and mitigations for a Mole B boat ramp. The configuration recommendations changed up to the date of the final approval and still the city admitted to open issues.

As Lanakila, Nahoa, former and current lifeguards, two former harbor masters, and many boaters and boater organizations testified the elimination of car parking results in reduced parking, insufficient to support the demand; the configuration represents a safety hazard; the elimination of boat slips is a signficant impact, and the traffic on the mole represents a safety hazard. Nahoa and Lanakila both testified they cannot operate in reduced space and parking configuration presented by staff. These are all significant impacts.

Several commissioners expressed their decision was based on fiscal considerations and that the impacts could be worked out later. If after three years of working the project, the City has been unable to define mitigations to the substantive impacts described, how is the public to have confidence that the city will magically be able to derive any real mitigations in the future? Relying on future definition of mitigations is a CEQA violation. The EIR must specify the mitigations to impacts in the document itself. Yet the EIR does not even assess any of these impacts as a significant impact.

Staff's recommendation ignores their own staff reports on EIR proceedings which clearly state the assessment of Boat Ramp location and configuration is critical to the total project definition. The zoning requires a boat ramp with any major project.

***Finalizing the CenterCal Waterfront project EIR and entitlements without first finalizing the boat ramp configuration, impacts, and mitigations could result in***

***eliminating the only boat ramp alternatives that would mitigate the impacts.. This EIR cannot and should not be finalized or approved without a thorough vetting of final configuration of the boat ramp andthe analysis of impacts and mitigations.. The public cannot assess the impacts of the Waterfront EIR without knowing the end solution for the location and broad configuration of the boat ramp.***

***Additionally, the City's inability to close on a solution for the boat ramp demonstrates it is prioritizing the non-coastal dependent uses proposed by CenterCal over the best location for this coastal dependent use. Every public discussion of the boat ramp resulted in the turn basin, Moles C or D as the ideal location for access, parking, safety, and proximity to the harbor entrance. But to build these solutions right would impact CenterCal's proposed development. The appellants maintain the optimal boat ramp placement configuration and size should be designed first and the rest of the project should be built around it. This is a harbor. Harbor uses should come first.***

It is also important to note that prior to the whole CenterCal project, City Staff, Harbor Commissioners and representatives of the boating community concluded that Mole D was the best site for a boat ramp of all sites in the harbor. According to the August 30, 2007 article in the Beach Reporter entitled "City studies feasibility of building a new public boat ramp", by Sascha Bush:

*"For several years, the city has been actively evaluating several sites within King Harbor to locate the best possible site for a public-access boat launch ramp. The Harbor Area Working Group – a committee made up of two council members, city staff, and boaters – had identified the side at Mole D as having the most potential development of the ramp. The location provides the most convenient in/out water access, offers more space for watercraft to maneuver safely without creating excess traffic and compared to other sites in the harbor it enjoys the most shelter from the existing breakwater."*

1. MOLE B BOAT RAMP LOCATION – The Mole B location for the boat ramp is a new and major change to the DEIR. Mole B was rejected in the DIER and recently proposed configuration was never fully vetted in the CEQA process. This alternative, unless withdrawn, demands the recirculation of the DEIR with this option more throughly vetted, described and analyzed.

While the EIR conveniently removes the helipad requirement in the EIR to squeeze in all the uses city staff advocate packing into Mole B, the City Council conclusion on the Mole B Master Plan directed city staff to include the helipad. City Harbor/Fire Officials argued its necessity from a public safety perspective. On July 5th, 2011, the City Council approved a Mole B Master Plan that included a helipad. The helipad remains a requirement in the Mole B Master Plan to this date. Just recently, a SCUBA diver suffering from the bends was brought to Mole B to be helicoptered to they hyperbaric chamber on Catalina. From The Beach Reporter:

"Man airlifted to Catalina Island after diving injury in King Harbor

Megan Barnes Jul 6, 2016

A man injured while diving in Redondo Beach's King Harbor was airlifted to Catalina Island for treatment in a hyperbaric chamber Wednesday afternoon, authorities said.

Redondo Beach Baywatch lifeguards responded at about 12:15 p.m. to a 9-1-1 call of a man with "dive-related injuries," said Los Angeles County Lifeguards spokeswoman Lidia Barillas. Further details were not available.

Hyperbaric chambers are used to treat decompression sickness—or "the bends"—a condition in which scuba divers who ascend too quickly after prolonged exposure to water pressure experience pain from nitrogen causing bubbles in their blood.

Barillas said she did not know what the man's specific injuries were. His name was not released.

Redondo Beach Harbor Patrol, firefighters and Los Angeles County sheriff's deputies also responded to the incident, picking the injured diver up at Moonstone Park, an outcropping that separates two King Harbor boat basins."

In addition to the loss of the helipad, trailer boats and other traffic blocking the incoming and outgoing lanes of the Mole due to overflowing traffic would block Fire Department ingress and egress to and from the Harbor Patrol station on Mole B. It is clear, that the location of a boat ramp on Mole B would jeopardize first responder response times.

King Harbor boaters have separately provided a litany of concerns based on the surprise assessment of yet another Mole B solution. These include blind spots created by the galveston wall, the narrow heavily trafficked fairway, the proximity to numerous main fairway activities, the limited parking and parking conflicts with existing uses, limited space and conflicts associated with returning boaters circling in the main and Basin 1 fairways while awaiting their turn to dock, and the large boats across the narrow fairway backing out into the boat ramp area. In its assessment of the Mole D boat ramp alternative, the DEIR called the potential of maneuvering hazards with commercial boats at the sportfishing pier to be a "signficant impact". The Mole D location is out of any traffic fairways and any professional skipper of a commercial vessel is certainly capable of safely maneuvering around trailer boaters in the relatively huge area of the turn basin. But with recreational boaters and kayakers and SUP'ers somehow the EIR concludes that backing right into an active, narrow fairway with a galveston wall blind spot in close proximity to SUP'ers and recreational boaters is not a hazard or significant impact. This clearly demonstrates the bias that has crept into the EIR assessments.

Harbor boater representatives and Lanakila Outrigger Canoe Club requested a workshop on the Mole B location due to surprise changes from the DEIR and continuing changes to the proposed configuration. The City refused, but Councilman Bill Brand offered his monthly community meeting as a venue to discuss the City's recommendation. The Assistant City Manager and Harbor Economic Director attended a standing room only meeting in a 120 seat conference room. Resident Sheila Lamb volunteered to take minutes, since the city refused to send clerical staff. BBR has scanned in those raw minutes and submitted them to the public record. The testimony overwhelmingly opposed the Mole B location. Substantive concerns mainly

concerned inadequate parking, safety, and inability of the Outrigger Club to continue operations. Lanakila provided a very informative video that demonstrated the space needed to move their outrigger canoes both into the harbor and out of parking area to participate in offsite competitions. The video also demonstrated parking demand that largely filled the area targeted for trailer parking. Testimony from current and former lifeguards and a former harbor master from Marina Del Rey highlighted the safety concerns with this location – site lines, cross winds, narrow fairway, lack of adequate queueing space, heavy traffic, proximity to large boats, and long transit to the harbor entrance. The former Marina Del Rey harbor master attested that Marina Del Rey explored moving their boat ramp to the end of a well used fairway and that solution was abandoned for safety reasons. This event is well documented in numerous newspaper articles. This testimony by well qualified attendees contradicts City staff's stated findings of their consultant.

Then again at the Harbor Commission meeting, former Redondo Beach Deputy Harbormaster Dornberg testified that if he were called on to place blame on a vessel collision at the proposed Mole B ramp, he would not find either party at fault, rather he would put the city at fault for the unsafe design. Commissioner Dalton stated he felt uncomfortable that there was no public workshops on the proposed configuration. He added that there were plenty of meetings on the boat ramp location for this project and the consensus was Mole C. And Commissioner Keidser in her dissenting vote stated that based on her experience boating in that area, the Mole B boat ramp is dangerous.

Base on all the evidence and testimony, it appears Mole B was selected for fiscal reasons and not for safety, capacity, or boater benefit reasons.

Staff's proposed solution eliminates up to 36 boat slips that are currently occupied by recreational and commercial vessels. The city states that the boats would be moved to other currently vacant boat slips, but the city has failed to demonstrate that the number of vacant slips are adequately sized to accommodate the displaced boat, several of which are amongst the largest boats in the harbor. Calls to the King Harbor marinas reveals no vacancies for large slips

and little vacancy in the medium slip sizes. This impact would be exacerbated by City's stated intent to move the large commercial vessels out of Basin 1 to mitigate impacts of the proposed pedestrian bridge. The solution ignores the fact that the vacancies that do exist today are a result of the recession. Prior to the recession 40 foot slips were on a 10 year and over waiting list by all the marinas. An article in the LA Times on May 7, 2009, entitled "Demand for boat slips in Marina Del Rey is drying up" by Andrew Blankstein, the article describes how the souring economy had impacted slip demand in Marina Del Rey. However, in Redondo Beach, the demand remained solid. "Jason McMullin...of King Harbor Marina,...said all of their 820 boat slips are occupied and there is a waiting list for boats over 30 feet." " At nearby Port Royal Marina, office manager Marion Harding said revenue has been steady even through the downturn. And for small boats or large yachts, there are no vacancies, she said. Those looking to park the largest vessels have to wait a decade." In fact Port Royal, refused to add any more people to the waiting list. Staff now states that they don't see demand for slips or trailer boating increasing, but that is contrary to boating industry performance.

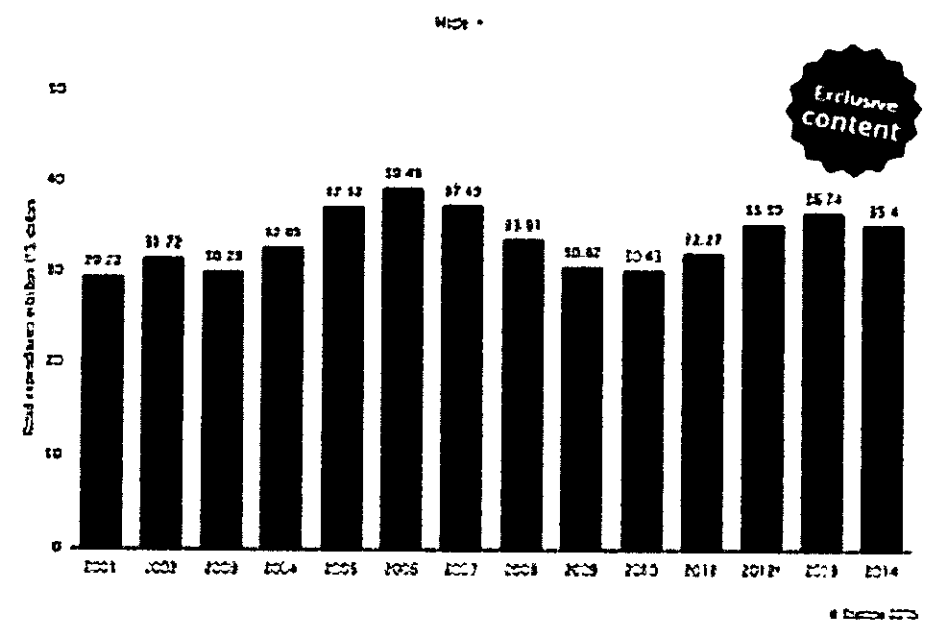
On November 14, 2007, City Consultant Moffatt and Nichol, submitted a memorandum to the City of the Redondo Beach entitled "Redondo Beach Boat Ramp Launch Ramp Facility Feasibility Memo". In this memo, Moffatt and Nichol states, *"Trailerable boats account for the overwhelming majority of vessels registered in the State of California, and the demand for boat launching facilities along the coastline in populous areas is every increasing with population growth." "The launch ramp facility is envisioned to be a popular amenity, and overflow parking opportunities will need to be explored to further accommodate peak use periods."*

In fact, the Department of Boating and Ways shows total pleasure boat registration in 2015 to be 90,342 boats. This number dwarfs other counties, with San Diego County being second at 55,680 pleasure boats. The EIR and city staff claim Marina Del Rey is oversized for the demand, yet Marina Del Rey continues to apply and receive grant monies to upgrade their launch ramp to and to increases capacity. In November 2014, Marina Del Rey was awarded a $300K grant to upgrade its boat launching facility. That grant is for the plans and specifications. County

Officials estimate they will invest $2.9M for the upgrade according to an article in The Log dated January 7, 2015 by Parimal M. Rohit entitled "LA County Supervisors accept $380,000 in grants for Marina Del Rey upgrades, law enforcement". The project does a number of upgrades including an additional floating boat queue dock to better accommodate peak boating traffic. According to the application, the improvements would increase boat launching capacity by 22%. So while city staff state Marina Del Rey's launch ramp is underutilized, the. County is trying to increase its capacity substantially.

Despite city staff claim to the contrary, the boating industry has shown several years of recovery from the impacts of the recession. Statistica, a Company that researches industry trends and sells the data, shows that the industry is recovering from a low new boat sales revenue in 2010 recovering through 2014.

**Retail volume of the recreational boating market in the United States from 2001 to 2014 (in billion U.S. dollars)**



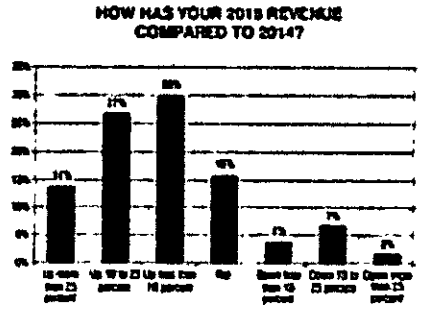
According to "Boating Industry" Magazine, a December 30, 2015 article by Jonathan Sweet entitled " 2016 Boating Industry Forecast", the outlook for the boat manufacturer sales will continue to improve on 2014 and 2015 sales increases.

*"Industry estimates put 2015 unit growth in the high single-digit percentage range, with similar numbers expected for next year.*

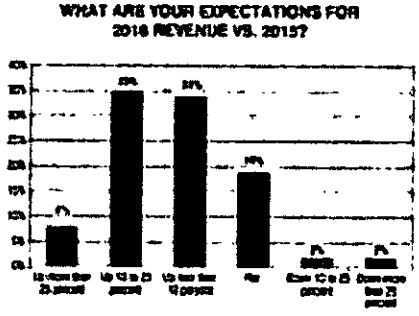
*'2015 is going to go into the book as a pretty good year... And as we look at 2016, we're looking at another strong year,' said Thom Dammrich, president of the National Marine Manufacturers Association.*

*Many of the broader economic indicators are healthy which is helping the industry recover from the downturn."*

From the article we can see the industry's growth from 2014 and expectations for 2016. 73% of new boat retailers saw growth over 2014 and 77% expected 2016 sales to exceed 2015 sales.



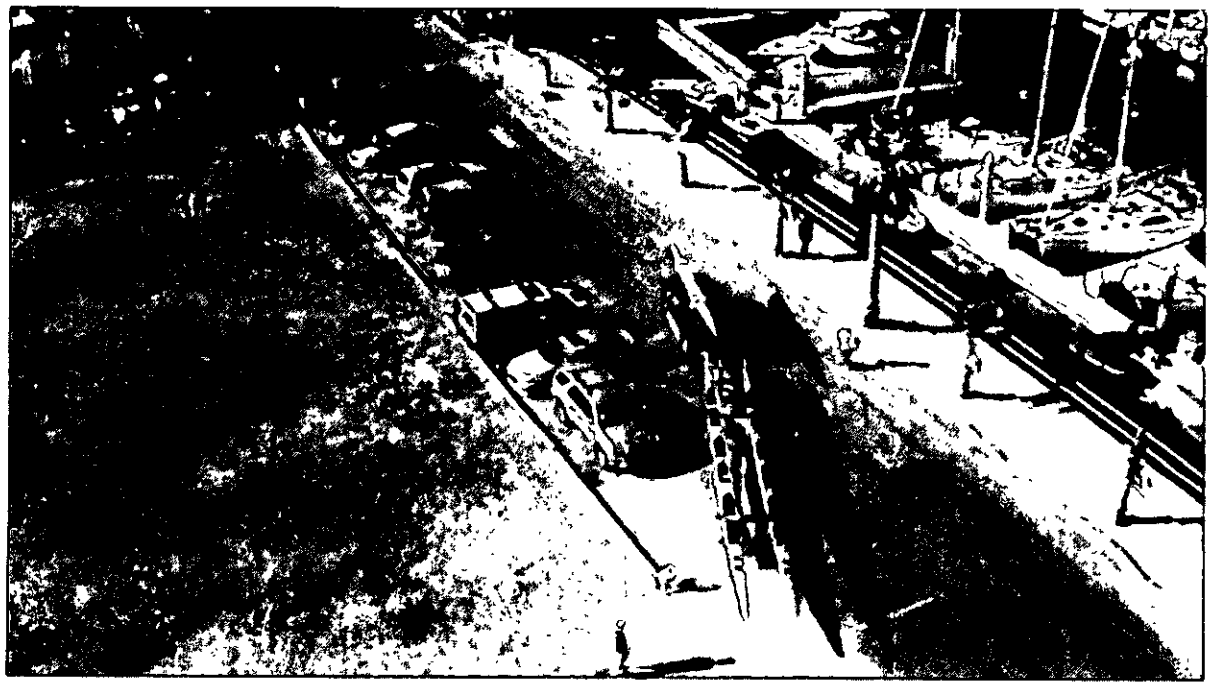

Click image to view larger (Source: Boating Industry survey)




Click image to view larger (Source: Boating Industry survey)

The staff recommendation eliminates current Mole B boater parking, all of the Mole B boater overflow parking, and much of the Moonstone Park and Lanakila parking. The city presents overhead images of parking utilization during unspecified dates and times, but these images misrepresent summer weekend utilization. There is insufficient parking for all the combined uses during the normal summer weekend days, much less peak weekends. Lanakila provided clear evidence that during summer weekends and evenings the parking utilization is much higher than depicted by the City staff.

As stated in the Human Powered Watercraft section, adding the hand launch boat ramp at this location would be dangerous and would only exacerbate the parking demand shortfall.

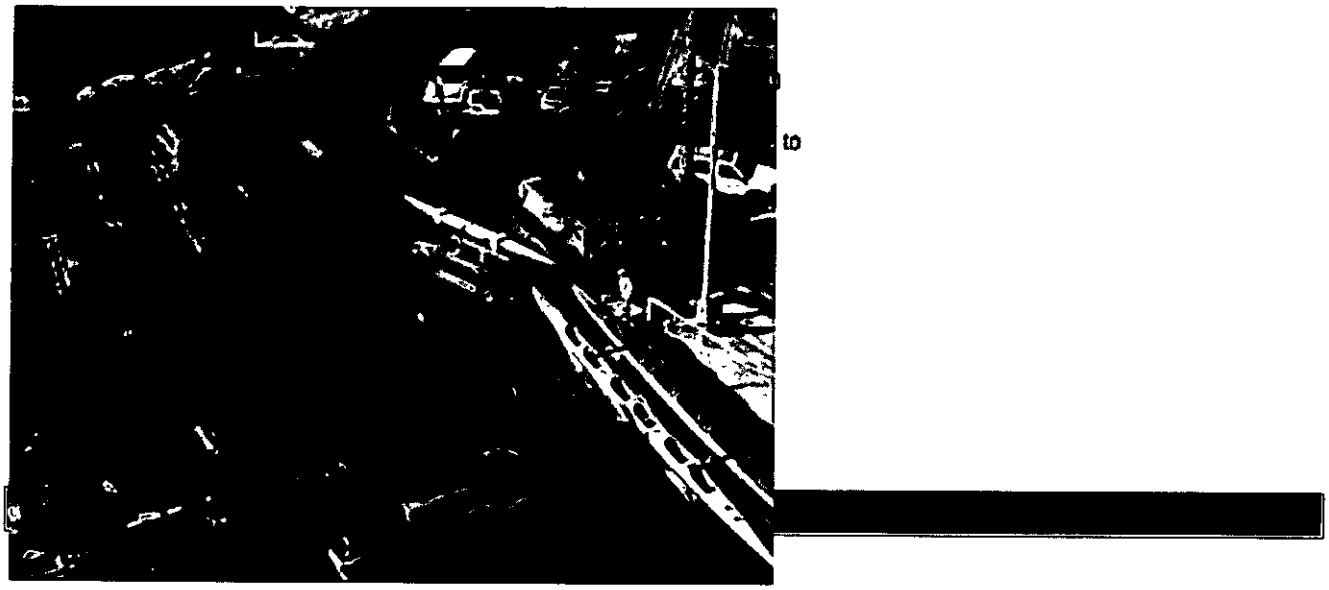


The Lanakila Outrigger Canoe Club has submitted a letter to the city stating that the proposed Mole B location would shut down their club. There is insufficient space to meet all the competing goals for the site and the loss of space and parking would prevent their club from operating. Lanakila provided images of parking that contradict City assertions that the parking on Mole B is underutilized and sufficient to meet all requirements. Lanakila alone represents a

54 to 78 parking space demand on Mole B. And their demand would peak on summer weekend when the parking demand for trailer boating, human powered watercraft, and recreational boaters renting slips would peak. Siting the boat ramp on Mole B as proposed would shut down an internationally renown and international competition winning outrigger club that has resided in our harbor since 1970 and is enjoying increasing membership.

Images from Lanakila Outrigger Canoe club show that parking that city staff have proposed be used for boat trailers is utilized for today by various harbor users. It also demonstrates the amount of maneuvering space required to navigate the Mole. The lower photo shows why the parking proposed by city staff in the Moonstone Park area would prohibit the club from moving their canoes to participate in races. While here they could clear the spaces normally used by Lanakila members, if you reduce parking the spots in this area would provide parking for those that rent slips and their guests – Lanakila could no longer ensure a safe route out of and into the outrigger storage area. The city is attempting to cram to many uses into too small a space.

Even in social media, everyday residents supporting the project know the Mole B boat ramp will not have sufficient capacity to meet demand:



The EIR's parking utilization analysis of Mole B relies on a parking study from over 16 years ago. It then resorts to counting parked cars in overhead aerial photographs on 22 random dates spanning 22 years without any indication as to the time of day the images were taken. Of these dates, 12 were weekends and 5 were unspecified. Only 5 were weekends when most boaters use the facility. Only 6 days were in the summer, which is peak season for boating activities. One cannot draw any reasonable conclusions from this mish mash of data from as long as 22 years ago. This makes it all the more evident that the city has not performed an adequate analysis of the parking demand or the impacts for a Mole B boat ramp.

| EIR Mole B Parking Image Date | Day of the Week |
|---|---|
| May 30, 1994 | Monday |
| November 30, 2003 | Sunday |
| April 28, 2004 | Wednesday |
| Summer 2005 | Indeterminate |
| December 3, 2005 | Saturday |
| March 15, 2006 | Wednesday |
| April 24, 2007 | Tuesday |
| July 30, 2007 | Monday |
| January 8, 2008 | Tuesday |
| May 24, 2009 | Sunday |
| Summer, 2009 | Indeterminate |
| November 14, 2009 | Saturday |
| Summer 2010 | Indeterminate |
| March 7, 2011 | Monday |
| Summer 2012 | Indeterminate |

| | |
|---|---|
| October 13, 2012 | Saturday |
| April 16, 2013 | Tuesday |
| April 23, 2014 | Wednesday |
| Summer 2014 | Indeterminate |
| February 18, 2015 | Wednesday |
| March 23, 2015 | Monday |
| February 2, 2016 | Tuesday |

The EIR continues to try to justify reduced trailer parking by using the misleading metric of demand per lane. In this metric, the city takes the average daily use and divides it by the number of facility lanes. Firstly, multiple commenters have pointed out and the city admitted that average daily use is in and of itself is misleading. Summer weekends, holidays, and special events drive numbers that far exceed daily averages. Even staff was forced to admit they have a problem with peak days. In fact, Cabrillo ramp daily data shows the utilization exceeds staff proposed latest parking configurations for trailers on Mole B, 59 days out of the year – mostly weekend days. To divide a useless number by the number of lanes at the ramp facility yields another useless number. In this case, the data may be showing you need every single parking space, but you have too many lanes at that facility. To illustrate, if you have 10 launches at a 10 lane boat ramp with 10 trailer spaces – You would have an at capacity parking facility and 1 launch per lane ramp utilization. The EIR would have us believe, if we reduce that same facility to one lane, we would only need one parking spot – yet parking demand was at capacity. This demonstrates the uselessness of this metric wrt parking demand.

While city staff continues to modify the Mole B concept, the EIR is constrained to 22 trailer parking spots, one of which is a washdown spot. The Harbor Commission passed the EIR with a significant impact betting on the future. This is not appropriate. The EIR's approval must be based on what is in the actual EIR.

***The Mole B solution results in significant impacts to long term recreational and commercial uses of the surrounding area. The location and configuration included in the EIR represent multiple hazards as well. This solution should be thrown out due to the wide ranging significant impacts and hazards.***

***When you look at the cumulative facts and evidence that have come to light, one can easily conclude that City staff has lost their objectivity. They seem so married to executing the CenterCal solution, that they twist information to fit their desired outcome and ignore blatant contradictions to their findings.***

2. MOLE D BOAT RAMP OPTION – Mole D in the vicinity of the current Samba's restaurant provides the best alternative for the siting of a boat ramp. This was the original site of the original boat ramp. It was damaged by a storm, but the harbor breakwall has since been reinforced and increased in height. In 2007, a joint committee consisting of Harbor Boater representatives, city staff, city council and harbor commissioners concluded Mole D was the best and least impactful location for a boat ramp. A November 20, 2007 staff report entitled "Seaside Lagoon Operation and Facility Planning" reported on the results of subsequent feasibility analysis. "The feasibility analysis has been competed...and demonstrates that the south end of Mole D is a viable location for a public boat launch ramp and that one could be installed with minimal disruption to other Mole D users." There is ample parking space available including 67 existing double length trailer parking spaces that could be relocated to the immediate vicinity. The lack of development affords ample space for maneuvering, washdown areas, and guest parking. The ramp would offload into the turn basin where trailer boat maneuvering would not interfere with the main fairway or Basin 3 fairway. It is in close proximity to the harbor mouth decreasing the exposure to increased boat traffic in and through the harbor. The city could continue to offer a boat hoist for solo, senior and disabled boaters who avoid boat ramps. And it is a short drive off of Harbor Drive that would not impact access to any access to Mole C uses, such as Seaside Lagoon, Portofino Inn, and Portofino Marina. An added benefit is a boat ramp here would preserve views through the southern tip of Mole D from Czuleger Park and Basin 3 of

the harbor and ocean. A breakwater should be required for this location to mitigate waves and surge, but one should be required for any location along Mole C and D. The solution would require moving Samba's, but that is no more impactful than any other location examined by the city. For example, the Mole C site would require the movement of Joe's Crab Shack.

***The city's primary reason for avoiding this logical solution is that it would reduce the amount of space available for development of non-coastal dependent uses.***

The Mole D boat ramp alternative assessment concluded proximity to the fairway from basin 3 or the sportfishing pier could create a potential safety hazard. The DEIR labels this potential safety hazard a "significant impact".

The finding on Mole D is not supported by the facts and by findings of the previous boater/ harbor commission/city council/city staff joint committee conclusion in 2007. There is ample maneuvering room in the turn basin and prevailing winds would not push trailer boats into any fairway. The professional captains of commercial vessels are certainly skilled enough to maneuver around and through the trailer boaters. But still the DEIR concludes this safety risk is a "significant impact".

However the EIR conveniently ignores this very same risk in their Mole B EIR findings. In this case maneuvering directly into well trafficked fairways is required with much, much less space and prevailing winds that would create a hazard to downwind vessels in slips and queueing vessels. Former Harbor Masters from Redondo and Marina Del Rey, local boating organization representatives, local boaters, and current and former lifeguards who have worked in King Harbor have attested to the safety risks of the proposed configuration. The city contradicts itself in stating this situation is not a significant impact while deeming the Mole D situation a "significant impact". Once again, this assessment demonstrates the bias that has crept into the analysis and findings in the EIR.

Finally, the EIR bias becomes more evident in the assessment that a Mole D boat ramp does not meet project objectives. The DEIR and EIR conclude that no pedestrian bridge would be built... Yet there is nothing inherent in the boat ramp at Mole D that would preclude this bridge. It states that it would project the site connectivity objective, but commercial development could be placed to make the connectivity contiguous through the harbor section and up to the pedestrian bridge. The EIR ignores that the promenade interruption occurs at the Seaside Lagoon and that a similar solution could be implemented at the Mole D boat ramp. As discussed elsewhere in this document financing of infrastructure improvements does not have to totally rely on the commercial development.

The projects paves over Seaside Lagoon for commercial use access. It forces formally separate recreational uses to use the same smaller space. It eliminates convenient parking for recreational users. It ignores recreational use parking demand. It blocks 85% of public views from Harbor Drive. It adds "concessions" that take up the already reduced usable public open space in the Seaside Lagoon public park. And it now tries to force too many recreational uses into the tiny space of Mole B. The pedestrian bridge limits access to Basin 3 boaters. And the project eliminates a well beloved and well used Seaside Lagoon saltwater sand bottomed pool and forces toddlers to wade in untreated and untested harbor waters. Why must all trades result in negative impacts to the recreational coastal dependent uses?

3. MOLE C BOAT RAMP LOCATION – Mole C boat ramp location represents too much compromise for the ramp and existing users. The site is too small to provide sufficient parking for the trailer boaters and their guests. The long narrow access down Portofino Way would be shared with Portofino Inn, Baleen, Portofino Marina, Rocky Point kayak and SUP rentals, Seaside Lagoon, Shade Hotel parking at the Triton Oil site, the new street through the development and the new parking structure on the corner of Portofino and Harbor. Portofino Inn's convention hall is right next door to the boat ramp and there is concern about boat ramp noise impacting events like weddings held in this facility. The location in close proximity to proposed Seaside Lagoon swim area and the current hand launch boat ramp, make this location

a hazard to recreational users of the hand launch ramp or future swim feature without costly reconfiguration of breakwaters.

It interesting to note, this has been the site of choice for over two years. Now suddenly, a few weeks before the EIR is released, the City suddenly remembers that Joe's Crabshack has a long term lease that the city can't afford to buy out? Not credible.

5. MOLE A BOAT RAMP LOCATION – Mole A would just be a dumb location. A boat ramp here would displace King Harbor Yacht Club which would force them to shutdown or move. Moving the yacht club creates rippling impacts to recreational uses to where ever the club is moved. Waves overtop the outer break wall here and would threaten people, boats, the boat launch facility itself and vehicles. Just south of the proposed site, the waters have shoaled to the point where they are dry on extreme low tides. This presents a hazard to navigation for users who are often infrequent users of their vessel, task saturated just after launch or awaiting retrieval, and who would not necessarily have a good understanding of the harbor. The road to Mole A requires a quick turn off of Harbor Drive barely south of Herondo. It then would have to snake through multiple 90 degree turns to get onto the road back to Mole A. This is tight maneuvering for a vehicle trailer combinations. Finally, this location is used for many popular boating, sailing, outrigger canoeing and SUP activities in the harbor that would create a conflict and hazard with boats launching into this part of the harbor.

6. MANNED KIOSK CONTROL AND RESERVATION SYSTEM

The city shows it demonstrates the Mole B solution for a boat ramp facility does not provide adequate parking. The city allows itself the option of manned kiosk control, closing the boat ramp, and/or using a reservation system. Multiple avid boaters have testified they have never seen a reservation system for a boat ramp. Boaters will not know there is a reservation system until they have already arrived. This favors local boaters who frequent the harbor and know the "game". But the city provides zero details on how this would work. Would there be a fee? How would one prove their reservation? How long in advance can one make a reservation? What

happens with no-shows? An undersized boat ramp will discourage non-locals from risking the investment in time and energy to come to Redondo to launch. Clearly, the city has demonstrated they know the boat ramps planned are inadequate from a capacity perspective. And they have provided no evidence their unproven and counterintuitive remedies would be effective or fair.

6. SUMMARY – Other than placement on Mole D, placement of the boat ramp in any other location in the harbor represents significant impacts to long existing coastal dependent recreational uses of the harbor. ***Since the zoning requires a new boat ramp with the CenterCal development, the determination of the final location of the boat ramp is essential information required in evaluating the Waterfront EIR. Approving the EIR as written and granting CenterCal entitlements would eliminate the best and least impactful location for a boat ramp and forces significant impacts on other parts of the harbor. Mole D is the logical location for the boat ramp. It would allow a properly sized and designed boat ramp facility; and, the only real impacts would be on non-coastal dependent commercial uses. The EIR should be held in abeyance until a final solution for the boat ramp is defined and evaluated.***

## EXCLUSIVITY

Throughout the proceedings CenterCal, CenterCal supporters and several elected officials have used public forums and social media to paint that the public is scared by the type of people the harbor area and especially the pier attract.

**Fred Bruning, CenterCal CEO, August 29th, in Daily Breeze:**

*"From the greater community, we heard, 'I never go to the waterfront anymore. It's rundown. It's just a bunch of bars. I wouldn't go there after dark.' " he said. "And we found people wanted to reconnect with the waterfront, but there wasn't anything to reconnect with right now."*

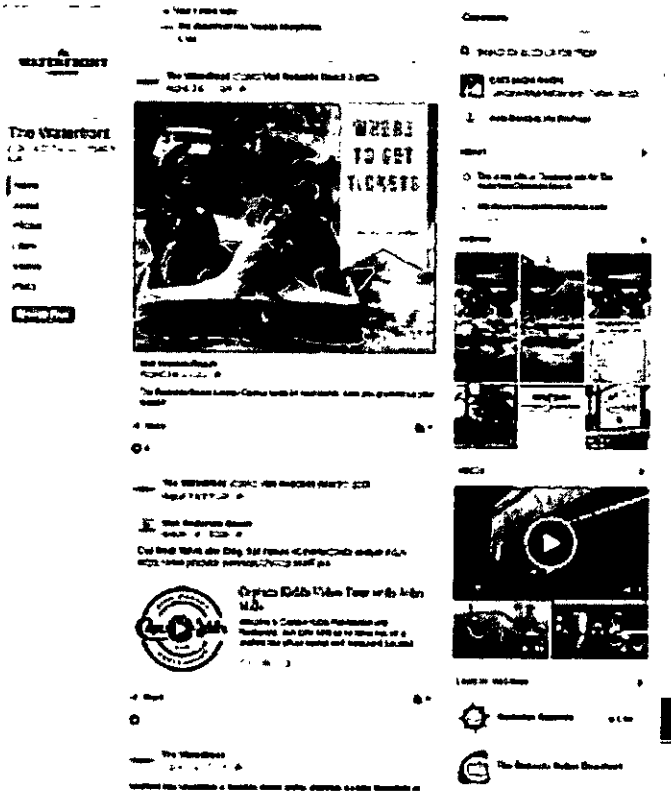
*Locals told Bruning they would perhaps go to Kincaid's restaurant once a year, or stop into Quality Seafood on the occasional Saturday, but they would leave immediately after.*

*" 'Because there's bad people there,' comments like that," he said.*

**Arnette Travis, CenterCal's 'CREW" leader on Facebook:**

*" It's scary on weekends and not reflective of Redondo's demographics."*

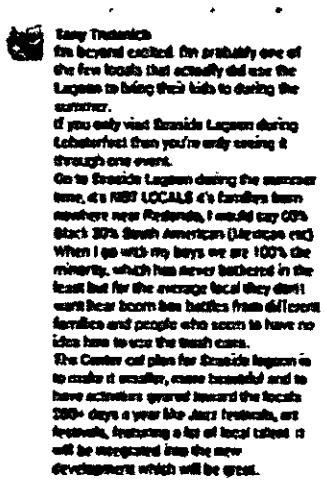
Tony Trutanich is a member of the family that old the Old Tony's restaurant on the pier. He is an administrator of a pro-CenterCal Facebook page called "Redondo Harbor Boardwalk and Market Place". Trutanich has stated on multiple occasions that he works with and represents the position of CenterCal. Additionally, CenterCal's Waterfront Facebook site provides a direct



[redacted]

link to Trutanich's Facebook site. The following image shows the Waterfront link to the Harbor Boardwalk site in the lower right hand corner.

Mr. Trutanich's post below on the Boardwalk Harbor Facebook site demonstrates the goal to exclude outsiders from the harbor and pier area.



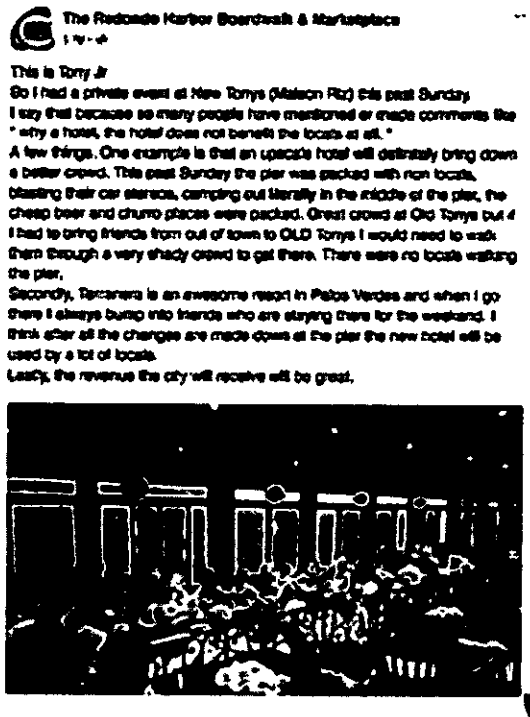
Tony Trutanich

I'm beyond excited. I'm probably one of the few locals that actually did use the Lagoon to bring their kids to during the summer.

If you only visit Seaside Lagoon during Lobsterfest then you're only seeing it through one event.

Go to Seaside Lagoon during the summer time, it's NOT LOCALS it's families from anywhere near Redondo, I would say 60% Black 30% South American (Jamaican etc) When I go with my boys we are 100% the minority, which has never bothered in the least but for the average local they don't want hear boom box battles from different families and people who seem to have no idea how to use the trash cans.

The Center cut plan for Seaside lagoon is to make it smaller, more beautiful and to have activities geared toward the locals 300+ days a year like Jazz festivals, art festivals, featuring a lot of local talent. It will be integrated into the new developments which will be great.



The Redondo Harbor Boardwalk & Marketplace

This is Tony Jr

So I had a private event at New Tonys (Malaon Ritz) this past Sunday

I say that because so many people have mentioned or made comments like " why a hotel, the hotel does not benefit the locals at all. "

A few things. One example is that an upscale hotel will definitely bring down a better crowd. This past Sunday the pier was packed with non locals, blasting their car stereos, camping out literally in the middle of the pier, the cheap beer and churro places were packed. Great crowd at Old Tonys but if I had to bring friends from out of town to OLD Tonys I would need to walk them through a very shady crowd to get there. There were no locals walking the pier.

Secondly, Terranea is an awesome resort in Palos Verdes and when I go there I always bump into friends who are staying there for the weekend. I think after all the changes are made down at the pier the new hotel will be used by a lot of locals.

Lastly, the revenue the city will receive will be great.

Share

Aug 16

More recently:

A recent post on the Harbor Not a Mall Facebook site shows that residents supporting the CenterCal development understand the Mole B boat ramp solution is a deterrent to use from those outside the community:

> **Jamie Davis** I think it's genius, the ramp satisfies the requirement, but will keep the masses away due to its small size.
> If it were 4 lane, people would complain that our harbor is not big enough to have all those additional boats cruising through.
> Like · Reply · Message · 1 hr

And another comment on the Redondo Harbor Boardwalk and Marketplace shows more project supporters citing the desire that the project exclude non-locals:

> **Gene Solomon** Tony, Can you please describe the differences-by sight-between a Redondo resident and a "non local". Do you not welcome all people to your restaurant? Do you think the City should not welcome everyone to the harbor?
> 14 hrs · Edited
>
> > **Timothy Oconnell** No the city should not welcome all people to the harbor . Let Santa Monica do that
> > 8 hrs

The marketing brochure being floated by CenterCal's tenant sourcing partner, The McDevitt Company shows that the move to exclude regional minorities from the harbor and pier is more than just local marketing rhetoric. The following phrases from the marketing brochure paint a picture of anything but and inclusive waterfront development:

*"A hub of social vitality for people who choose to live in this **affluent** community"*

*"Full service restaurants with a diverse collection of cuisine and dining experiences to create a vibrant and **sophisticated** nightlife scene."*

*"**Elevated**-yet-relaxed restaurants""*

*"One-of-a-kind shops and established **best-in-brands**..."*

*"The Waterfront offers a nice relevant environment for **distinctive** brands to reach **exceptional** consumers who have chosen to live/work/play just steps from the beach."*

*" **Unique** retailers placed in a **sophisticated** yet laid back environment"*

*"**Best in class** health. beauty, and lifestyle amenities."*

*"Retail/restaurant **hand picked** to resonate with the **sophisticated**, yet laid back culture of the South Bay"*

The brochure then lays out the the demographics with terms like "*urban chic, connoisseurs, top rung, laptops and lattes, trendsetters, Pacific Heights, wealthy seaboard suburbs, and silver and gold*", most of the inland neighborhoods are designated "*all others*".

For comparison the lease opportunity advertising for Shoreline Village in Long Beach, reads "*Styled after a quaint Cape Cod fishing village, Shoreline Village is a family friendly destination by day the develops a sense of romance when night falls.*" "*Refreshments available at the village range from casual to sophisticated.*" "*Kids of all ages can experience the magic of Shoreline Village's carousel or practice their hoop skills in the arcade.*" The site goes on to stress affordability and family experiences. The difference in marketing is a marked difference and is more inclusive rather than exclusive.

The City's market study analysis performed by AECOM and included in the DEIR as an attachment further demonstrates the project is aimed at more affluent customers. The hotel is described as a "boutique hotel" designed to "*create and promote a stylish, luxurious, aspirational, or advantage-grade ambiance.*" "*Boutique hotels will typically command a*

*higher ADR than other hotel properties, with a premium up to 20 to 30 percent above market pricing for competitive properties.*" The analysis describes the movie theater as a "specialty or luxury cinema". "*The specialty cinemas target affluent and older movie going demographic and to some degree families.*" "*The higher price point compared to traditional theaters indicates the market area is wider yet capture rate is lower.*"

The proposed Master Conditional Use Permit would allow CenterCal to establish exclusive parking through valet parking. This is simply another way of excluding recreational and less affluent harbor users from access to the limited parking. Furthermore the city contemplates a "reservation system" for the boat ramp and "SUP lockers" for SUPers to protect their SUP's while they find parking. While both of these are deterrents to those who do not frequent the harbor area, the City is silent on what the cost of these services would be. Charging for these services would just further the exclusive environment of the harbor and pier area. The under capacity boat ramps advocated by staff are just another form of exclusivity, setting those who cannot afford slips from using the harbor. The limited size of the boat ramp facility is directly impacted by staff and CenterCal's desire for more non-coastal dependent upscale commercial uses.

***In summary, what is currently an extremely popular attraction for people from all backgrounds and all income levels, is being transformed into a more exclusive and sophisticated development targeting more affluent people. It is predominant in CenterCal social media rhetoric as well as their marketing for tenants and selection of uses.***

***The more affordable recreational opportunities are all negatively impacted by the development, Seaside Lagoon, access and parking for fishing, access for stand up paddling and kayaking, access and parking for passengers on whale watching and sportfishing boats, forcing the outrigger canoe club to shut down, and the staff's preferred alternatives for the boat ramp artificially limit the boat launching availability and capacity for those who cannot afford a slip in the harbor.***

## TRAFFIC

Despite a public records request, it does not appear that the city has provided all data, analysis and calculations related to the weekend traffic analysis for the protect. The appellants were unable to find the LOS calculations. Therefore this traffic analysis is not complete due to unreasonable time constraints and missing information. In fact, when the public records request was resubmitted, the City responded that they needed more time to supply the actual traffic analyses. This delay means the appellants cannot complete our traffic assessment in time to submit this appeal. However, we will submit what we are able to comment on.

The proposed mitigations to traffic impacts create unsafe conditions by eliminating medians and decreasing lane widths at complicated saturated major intersections such as PCH/Herondo/ Catalina/190th.

CenterCal and the city have both stated that underperforming uses of the project would be repurposed. The movie theater was specifically given as an example. The conversion of a movie theater to a like sized retail or restaurant would increase traffic and parking demand. However, it is unlikely if a use such as the movie theater fails, the city would find anything but that a repurposing of the huge facility was required despite any impact on parking and traffic. Indeed Redondo has experienced this type of repurposing in the harbor already. The 60,000 sq ft Pier Plaza development on top of the pier parking structure was to be retail and restaurant uses. But after the development failed, the city has allowed it to be used mostly for office space that has nothing to do with coastal dependent uses or visitor serving commercial uses.

Despite comments in the DEIR, the city has failed to incorporate the real world constraints on traffic infrastructure into their assessment of traffic in the project area. The EIR merely responds that it has met minimum requirements. This renders the city's assessment of impacts inaccurate and understated. Rather than repeat all the infrastructure constraints, BBR references the traffic section submitted in its comments on the DEIR and summarizes them

below.

| Infrastructure constraint | Impact on traffic capacity |
|---|---|
| Harbor Drive extremely narrow lane | Reduces traffic capacity |
| Street parking along Harbor Drive | Parking movements reduce Harbor Drive traffic capacity, exacerbated by narrow lanes |
| Sharrows on Harbor Drive | Bike traffic in lane reduces traffic capacity. Nominal bicycle speeds are under 10 MPH. No passing lane as there is on Hermosa Ave. |
| Short turn pockets from Harbor Drive onto Yacht Club Way, Marina Way, and Portofino Way. | Turn traffic regularly blocks south bound lane creating backups and reducing traffic capacity. |
| No turn pockets at driveway entrances | South bound traffic on Harbor Drive comes to standstill whenever someone stops to enter a driveway. Exacerbated by two way bike traffic on the bike track and pedestrian traffic on the sidewalk. |
| Traffic conflict on center turn lane at Port Royal entrance and Beryl Drive. | The short distance between Beryl Drive and the Port Royal parking entrance creates conflicts between northbound traffic trying to enter Port Royal parking lot and the traffic queue of southbound drivers turning east onto Beryl. |
| Four way stop at Ruby's parking lot entrance. | Backs up traffic for over a quarter mile on summer weekends – through Beryl/Harbor intersection. |
| Short road segments – Torrance Catalina to Pier Parking, Torrance Catalina to Broadway, Torrance Broadway to PCH, Beryl Harbor to Catalina, PCH Catalina to 190th. | Short road segments cannot store enough traffic, creates back ups upstream, significantly reduces capacity and LOS at related intersections and upstream road segments and intersections. Gridlock occurs regularly on weekends. |

| | |
|---|---|
| Bike Track | Bike track has two way traffic which reduces gaps for vehicles turning into or exiting driveways. Exacerbates traffic blockages on Harbor Drive. Further exacerbated by pedestrian traffic on busy weekends and evenings. |

Submitted and included photographic evidence shows these conditions clearly cause traffic backups today, although the EIR would have us believe that Harbor Drive and other traffic flows very well today. This evidence makes it very clear that the EIR traffic analysis cannot accurately predict future traffic as conditions today are worse those predicted in the EIR for post project traffic.

And the Waterfront Plan only exacerbates the conditions noted above:

- It adds more parking driveways and three new road entrances
- It adds a very complex intersection where the new road connects to Harbor Drive. This intersection will have a driveway entrance in close proximity, a bike path that requires two intersection crossings to get to the bike track, and circling parking traffic.
- Insufficient parking will increase traffic on Harbor Drive above that assessed in the EIR as traffic circles looking for parking. In normal mall parking lots, circling traffic can stay off public streets and stay within the parking lot. That is not possible with the Waterfront design, so circling traffic will have to renter Harbor Drive and Portofino way increasing traffic and turn movements that must cut through the bike track.
- The Shade Hotel (not part of Waterfront Project) valet parking will double guest traffic. For each guest arrival and departure, Shade Staff will have to cross the bike track and travel on Harbor Drive and Portofino to valet guest cars.

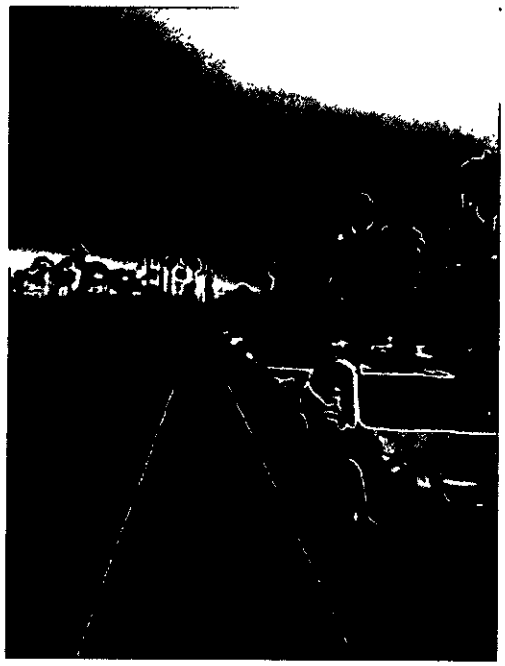
The city continues to use trip generation tables instead of actual traffic counts to characterize

current traffic and determine the change in traffic trips with the new development. The city has repeatedly stated the harbor and pier businesses are underperforming. Use of the trip generation tables rather than real data or discounted trip generation numbers artificially lowers the impacts assessed on each intersection which then ripples into misrepresentation of LOS.

It appears the weekend analysis adds predicted weekend traffic of the increased development to weekday traffic counts. The city knows and supplied photographic evidence documents that weekend traffic to and from the harbor area is substantially heavier than weekday peak hour traffic.

One way to test models is to compare them to real world observed conditions. The photos that follow show a current gridlock condition on Harbor Drive that the DEIR traffic calculations say should not exist even after cumulative development and the Waterfront project are fully built out. But this demonstrates the impact of the infrastructure limitations that are not included in the traffic calculations and modeling. The images show Sunday mid morning traffic on an overcast mid July Sunday. The images show traffic on Harbor Drive backing up from the stop sign at the southern harbor parking entrance all the way back through the Beryl/Harbor/ Portofino intersection. The rear of the back up was about a quarter mile from the start of the back up. This situation is the definition of gridlock. And this occurrence is not an anomaly. This is a regular weekend and weekday rush hour occurrence. Traffic flow has broken down because one intersection cannot handle the traffic flow and starts to affect flow through preceding intersections. The EIR does not examine this three way stop sign controlled entrance or any entrance/exit of to the parking structures or driveways of this project even though it is foreseeable that these will determine traffic flow capacity of the Harbor Drive and the new road. Since the assessment does not accurately represent the current conditions and traffic flow, the predictions post project completion cannot be trusted or counted as valid. Again, the City analysis does not account for well known and documented infrastructure limitations and conditions. And as pointed out in the initial DEIR response, the project increases in driveways, repeat traffic circling looking for parking, and the poor bike path configuration will only compound the errors that are evident by looking at current conditions.

Also note, the first image shows that despite City EIR claims to the contrary, parking in the harbor is already near capacity on a non-holiday weekend.



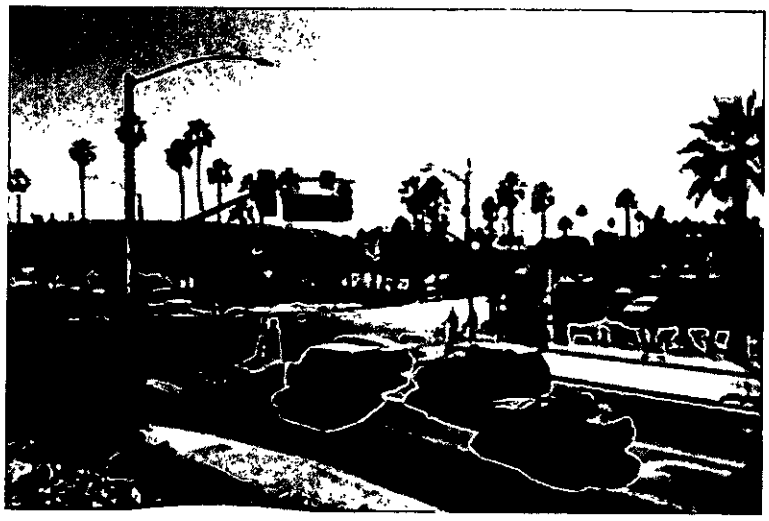
## MASSING/SCALE AND DECEPTIVE RENDERINGS

CenterCal renderings and marketing videos released to the City, press and public were specifically designed to hide the real mass and compactness of the site. Recently, CenterCal released images of their model of the project. Again, they showed convenient perspectives. But after public pressure, CenterCal opened up their model for public viewing at their offices 8 miles away during limited hours. A CenterCal rep had to be present to control the messaging. But what has come out of that is pictures from the public that show the true massing of the project and that massing is not similar to the scale of surrounding development.

The following pictures show a massing and scale that is not experienced in Redondo except for mall sites and industrial sites. This first image shows how massive and dominating the project will look from Harbor Drive.

This second image focuses more on just Harbor Drive. The project represents a virtual wall between residents and the harbor. This is how most residents will experience the development most of the time.

Here is a current image taken from a similar angle from the balcony at Redondo Hotel. The before and after images of massing and development are shocking. Yet the EIR concludes massing is consistent and there are no significant view impacts. Our previous DEIR comments address the dramatic impact on views.



This rendering demonstrates some of the manipulation practiced in the EIR and City/CenterCal representations to the public. Note the beach looks wide, endless north to south. And it looks deep, it looks like hundreds of yards to any sizable development. Palm trees dominate the skyline.

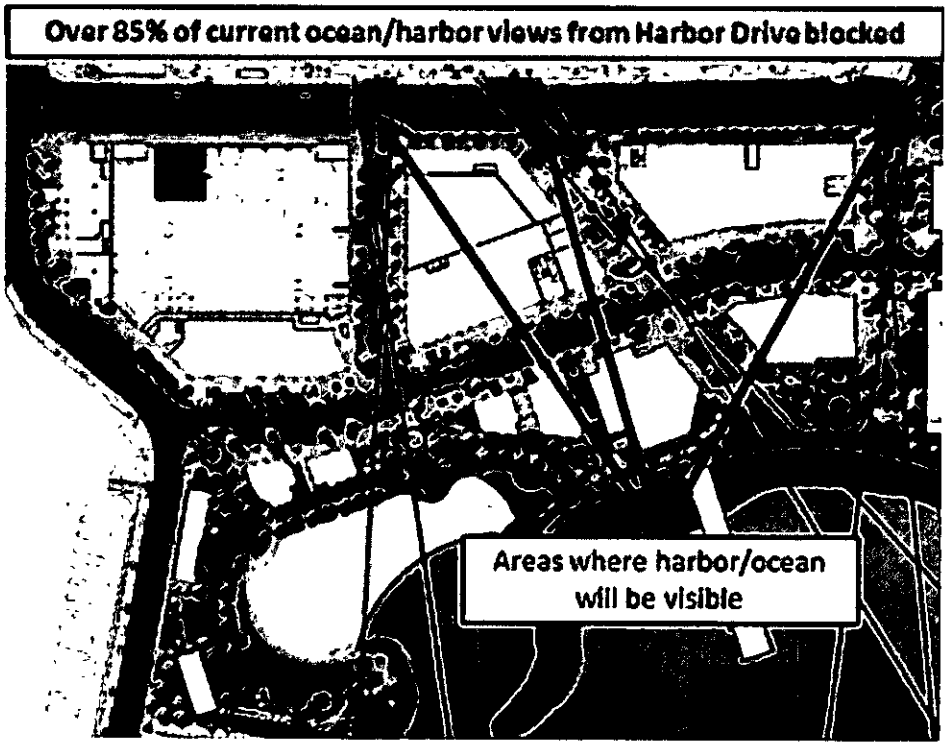
The next image is a photo of the scale model. This image clearly shows a much smaller beach/ harbor water interface tightly framed by breakwater boulders. It shows a much more constrained beach much closer to the development. And it shows how the massive parking

structure/commercial building and the theater building will loom over the small beach area. Buildings not palm trees will dominate the skyline for any who use the Seaside Lagoon beach. The model brings the massing into a real perspective.

## VIEW IMPACTS

The city incorrectly assesses the comments wrt to view impacts. Standing at any point along S Harbor Drive in the project area, any observer has some view of the harbor, the ocean, boats in the harbor, and/or the cliffs of Palos Verdes. The site assessment provided by BBR used the plan views provided by CenterCal and were generous in that they did not assess all the views blocked by landscaping in few slivers of view corridor left in the proposed development. In fact the view blockage is over 85% even with the new sliver in the parking structure and the slight

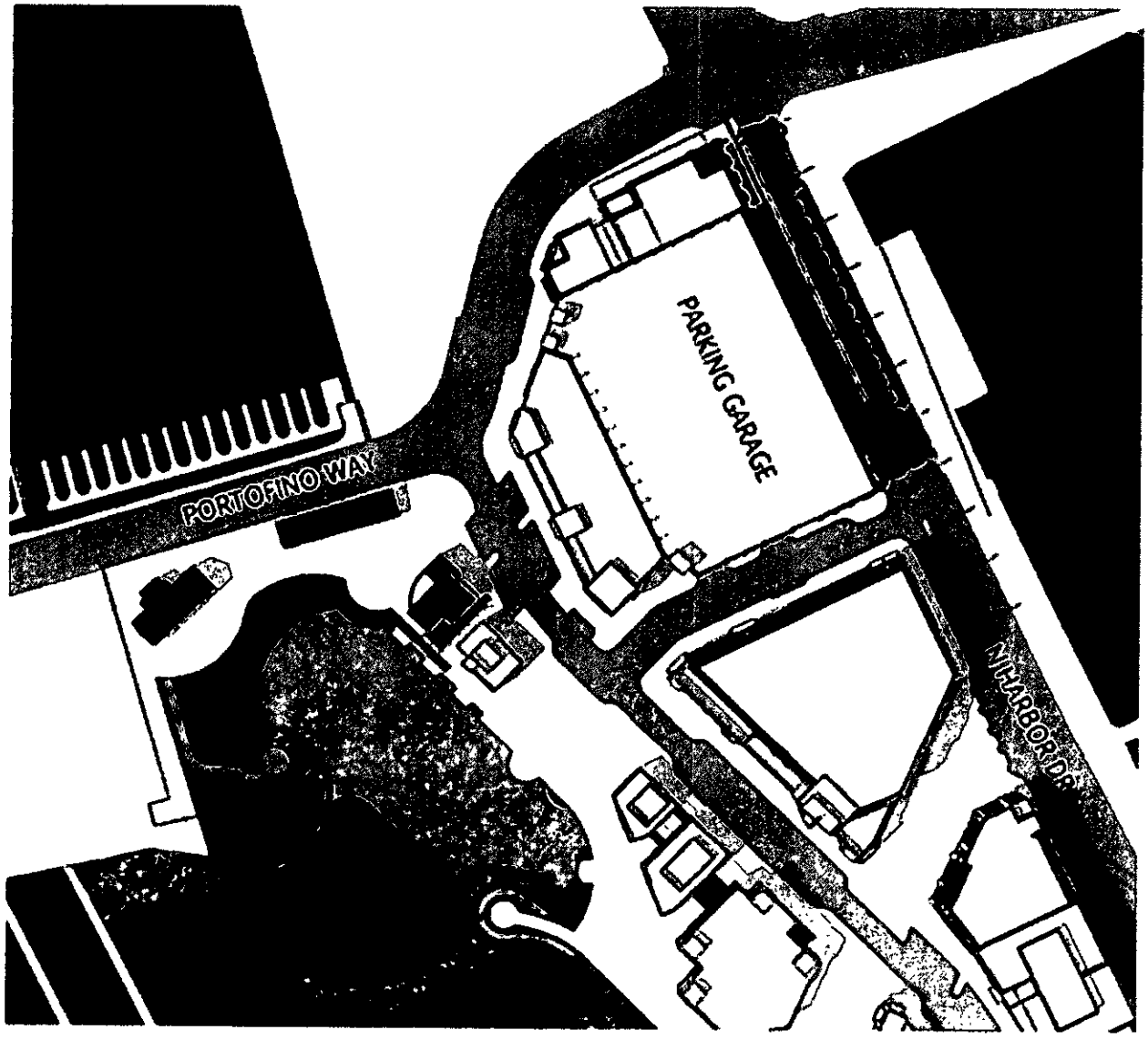
parking structure setback from Portofino/Harbor intersection. The city's assessment that 60% of the views are still available under the development are not supported by any evidence. The city's assessment relies on view points and angles that were specifically selected to provide a favorable assessment. Had the EIR chosen key views of Catalina, the cliffs of PV, the Harbor entrance, from hotel guest perspectives, the evaluation would have demonstrated a significant impact. This shows the role City staff have now taken as advocates which biases their assessment and inputs into the EIR.




Commissioner Jackson noted how the development created an "urban canyon" feel along South Harbor Drive. The CenterCal model of their development clearly demonstrates the visual wall of development. This is how most residents and visitors will experience the harbor without actually entering the mall development.

Commissioner Jackson also commented that not only would bikers and joggers on Harbor Drive feel like they are in an urban canyon but they would also be in a darkened shadow of the development. This shading analysis by the City shows residents and visitors on Harbor Drive

would be in a shadow for most of the afternoon and evening most of the year. The EIR laughingly calls this shading a benefit because of its cooling affect. The EIR must be concluding that since the massive buildings block the cooling sea breezes, block the sun makes up for it.



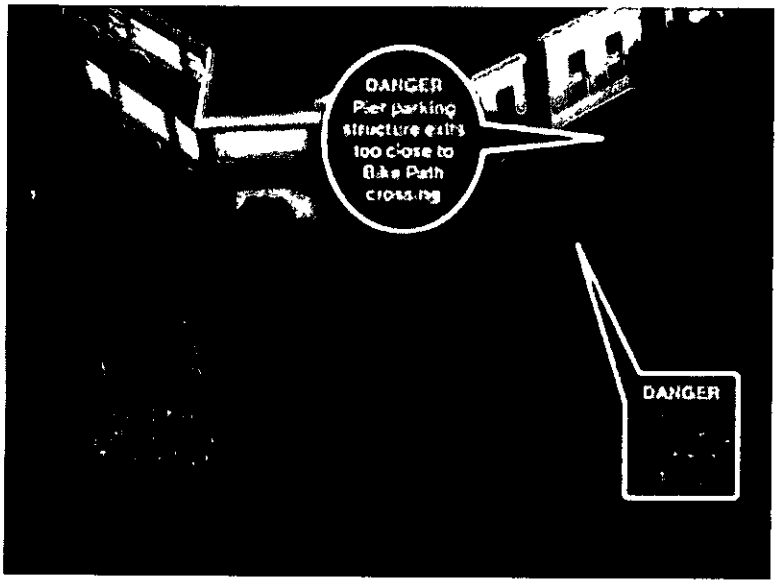

FALL / SPRING EQUINOX 3PM
MARCH 20 / SEPTEMBER 23

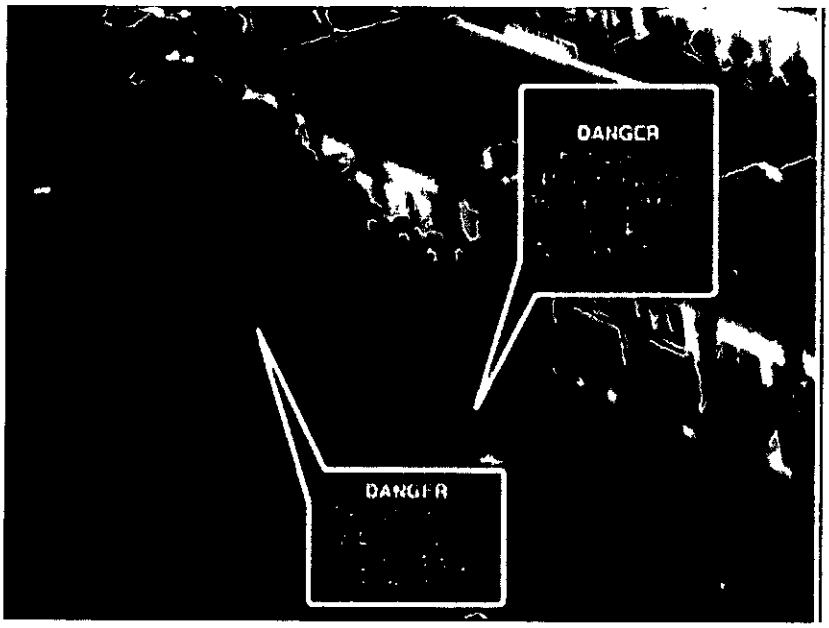
The Heart of the City EIR evaluated a Market Hall at the same location the the Waterfront project depicts one. The HOC EIR showed a significant view impact from mid Czuleger Park, the view impact gets worse as one gets down to the plaza at the base of the park.

## BIKE PATH

The City recently completed a new bike track on the west side of Harbor Drive. In the April 16, 2013, city staff administrative report entitled "Herondo Street/Harbor Drive Gateway Improvement Project Design", the City clearly states their goaL to "remove potential conflicts between bicyclists, vehicles, and pedestrians at the north and south ends of the North Harbor Drive" and to "improve regional bicycle facility connectivity.

The proposed bike path on the east side of the new road joining Torrance Blvd to Harbor Drive reintroduces dangerous street crossings that the city just paid over $4M to eliminate on Harbor Drive. While the original double crossing requirement only affected north bound bike traffic at either end of Harbor Blvd, the proposed bike path requires bike traffic in BOTH directions to make the dangerous crossing twice and the northern crossing requires crossing two streets (see second image of bike path from the CenterCal model). This solution is WORSE than the situation just remedied on Harbor Drive. The City should define alternate solution that eliminates any bike traffic crossing the new road. This is a dumb and dangerous design. The City should not have allowed it to make it to the FEIR. But it serves as yet another indicator that the commercial uses were given priority to all recreational uses in the project area. Photos of CenterCal's model highlight the poor design. In addition to the safety issue with crossing three streets and multiple new parking driveways, the new bike path would undo the goal of the Harbor Drive Bike Track to improve connectivity with regional bicycle facilities – the strand on either end of the Harbor/Pier Area.

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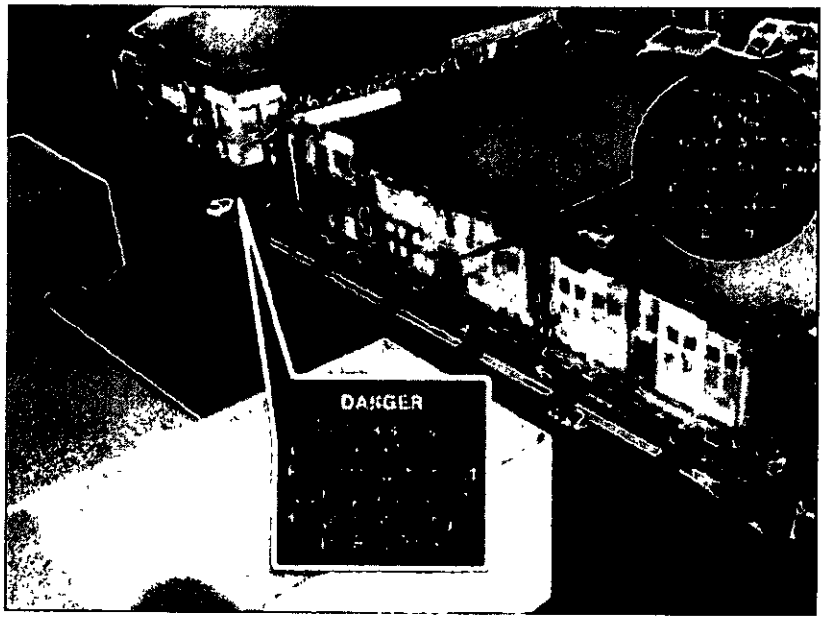
DANGER


DANGER

The city still allows the pedestrian path through the development to be labeled as a bike path. A recent study presented to the city council demonstrates the city understands the conflicts between pedestrians and bicyclists create hazards. And this study was just for the parking structure. The conflicts of people shopping and eating in the harbor area especially on the sloped drawbridge represents an even greater risk. It is deceptive and irresponsible for the city to allow the claim that the pedestrian path through the development would ever be a realistic and safe bike path.

## EIR MASTER RESPONSE AES POWER PLANT SITE:

The EIR essentially states any assessment of future development on AES site is speculative. While the City cannot predict with precision what will be built on the AES site, the City can make a middle of the road assessment that would provide a basis for determining the cumulative impacts. The City know something will be done with that property. In speaking with developers bidding to buy the AES property, we know the upper end of development is just below what was defeated in Measure B. We also know from AES proceedings with the CEC that if they rebuild their power plant, we know the footprint and that AES' intent is to repurpose the majority of their property. A reasonable assessment would be to halve Measure B development for the assessment. This is a midpoint between the Measure A, Measure B and the potential buildout of a new powerplant plus a mixed use development. The EIR responds that the repurposing of the AES site would occur well after the Waterfront timeline, but that is not necessarily true. The current plant rarely runs and AES' contract with SCE expires in 2018. It is an old, inefficient plant and SCE and the ISO prefer more modern plants that can respond more quickly and efficiently to peak demands. So it is highly likely that AES could begin any repurposing in 2018. Right now, the City has an issue with a lease in the pier parking structure that does not expire until the late 2020's. So it is foreseeable that both projects would be going on in parallel. Many

of the impacts of the Waterfront Project could be relieved by integrating a solution with the AES site.

## EIR MASTER RESPONSE CUMULATIVE ANALYSIS:

The EIR relies on regional projected growth rates in population, jobs, and traffic derived by SCAG. However, the numbers used in this study for Redondo Beach demonstrate that they understate the results for our city. Page 32 of the Regional Transportation Plan Growth Appendix (referenced in the EIR response) shows a job increase of just 1,500 jobs from 2008 numbers. Yet the EIR and CenterCal both assess that this project alone will generate nearly that entire growth number. This demonstrates that using regional assessments does not provide a realistic assessment based on the facts available on this and upcoming projects.

Hermosa Beach provided a list of current projects that the City ignored by stating the regional growth statistics accounted for the increase, however the SCAG documents cited by the City did

**Table 2**
**PLAN Hermosa Nonresidential Development Capacity**

| Land Use Designation | Acres | Existing Building Sq Ft (2015) | New Building Sq Ft (2015–2040) | Total Building Sq Ft (2040) |
|---|---|---|---|---|
| Neighborhood Commercial | 3 | 93,900 | 8,800 | 102,700 |
| Community Commercial | 38 | 976,200 | 154,500 | 1,130,700 |
| Recreational Commercial | 7 | 226,300 | 176,500 | 402,800 |
| Gateway Commercial | 24 | 595,200 | 231,700 | 826,900 |
| Service Commercial | 5 | 82,800 | 22,100 | 104,900 |
| Light Industrial | 6 | 132,000 | 36,800 | 168,800 |
| Total | 83 | 2,106,400 | 630,400 | 2,736,800 |

not include the growth inducing General Plan amendment that is currently undergoing CEQA analysis. This plan dramatically increases commercial uses in the immediate vicinity of the project. The following table is taken directly from Hermosa Beach's description of the land use

changes in their Plan Hermosa:

This represents a 30% increase in commercial development, which will drive proportional increases in traffic that far exceed SCAG regional projections especially when combined with trips generated by the Waterfront Project. And because Hermosa is on one square mile the traffic impacts will be focused in close proximity to the Waterfront and the traffic it generates.

When the known projects and zoning changes outpace the regional projections, the Agency should use the known projects for cumulative impacts. To do otherwise would under represent the future traffic impacts. This is particularly critical because the Highway Capacity Manual clearly shows that as intersections reach their level of saturation, small increases make large changes in Level of Service. The EIR applauds itself in including much smaller projects in their projections, but then ignores large projects that the City knows would impact traffic assessments.

The city fails to apply the SCAG population growth data to demand for any of the recreational uses in the harbor and the sizing of those facilities and resources.

## ASSESSMENT OF PROJECT OBJECTIVES AS STATED IN EIR:

The EIR establishes objectives that do not reflect the priorities and mandates of the Coastal Act and Redondo Beach LCP, LUP, and zoning policies, regulations and requirements. The following table demonstrates examples of the issues with how the EIR treats and interprets the project objectives.

| Objective (Section 1.2.5 EIR) | EIR Interpretation Issue | Examples |
|---|---|---|

| | | |
|---|---|---|
| Optimize the full potential of approximately 36 acres of the Redondo Beach Waterfront by providing a distinctive high quality mixed-use environment to support the City's ongoing economic and recreational revitalization of the Waterfront, reducing seasonality, and renewing a source of pride for the community that honors Redondo Beach's rich history and family-friendly beach culture. | City repeatedly maximizes commercial non-coastal dependent development at the expense of recreational uses. Waterfront recreational activities will be seasonal regardless of solution. Fewer people participate in cold seas with cold, windy weather. Project ignores "family friendly beach culture." The city ignores the "distinctive, high quality" part of the objective. | Elimination of family-friendly elements of Seaside Lagoon. Justifying impacts using "highest and best use" – a real estate term for most revenue generation – when the Coastal Act charges the city to balance the competing uses. The box-like large buildings of the development are not "high quality" architecture or design. |
| Reestablish a vibrant Waterfront destination that serves the local community and attracts residents and visitors by providing a viable and cohesive mix of distinctive<br>first class water and landside amenities that support and augment a variety of year round coastal-oriented recreational opportunities. | Traffic gridlock; dumb and dangerous, new bike path design; high end shops and restaurants; and negative impacts to all recreational uses reduces visitor and recreational users. The waterside amenities are hardly first class. Coastal oriented recreational uses will decline in offseason due to shorter days, school demands, colder and windier weather and colder seas. | Proposed bike path must make thre,e 90 degree, street crossings to reach Harbor Drive Bike Track. Design that made Seaside Lagoon truly unique and family friendly are gone in new configuration. Project cannot accommodate bus traffic for groups that have historically used Seaside Lagoon in the summer. Proposed boat ramp configuration, capacity and location is hardly "first class:. |
| Increase net financial return to provide for the repair and replacement of aging and obsolete infrastructure (e.g., Pier Parking Structure), improvements to operational onsite water quality, adaptation to address sea level rise, enhancement of public safety, public amenities, and an upgrade of the deteriorated visual character of the Waterfront. | Increase net financial return does not equate to "highest and best use". City is still obligated to balance development and enforce the LCP and Coastal Act requirements related to public access and prioritization, preservation and enhancement of coastal dependent uses. | Forcing commercial boats out of Basin 3. Substandard size, configuration and location of boat ramp. Artificial elimination of boat ramp location alternatives that are less impactful. Use of "highest and best use" to justify impacts. |
| Effectuate the goals and objectives of the City's Local Coastal Program, which provide for the development of up to 400,000 net new square feet of commercial development in the Waterfront area. | Even the statement of this goal shows the bias against recreational uses and public open space. It avoids highlighting requirements to preserve, enhance and where possible expand coastal dependent recreational uses, protect views, protect access to coastal resources and uses, and to ensure scale is appropriate. | The LCP allows up to 400,000 sq ft of development across the entire harbor. It does not require we meet that cap. And nowhere does it say it is appropriate to cram 72% of the cap (if you exclude parking structures) into just 22% of the harbor area. The absence of other key elements of the LCP in this goal is telling. |
| Leverage a public-private partnership that generates sufficient revenues to support a coordinated revitalization of the Waterfront. | Generation of "sufficient" funds is subjective and is dependent on overall financing strategies. This goal does not drive "highest and best use". | Highest and best use is used as justification for impacts. Coastal Act requires agency to balance competing requirements. In every case when this EIR makes a trade if favors the commercial development over the recreational and coastal dependent uses. |
| Create a project with readily accessible and easily identifiable pedestrian connections, transit connections, and conveniently located parking facilities providing access by foot, bike, bus and car to a synergistic mix of commercial and recreational uses. | EIR neglects to evaluate sufficient and "conveniently located" parking facilities for any of the recreational uses. Proposed development optimizes auto traffic while proposing dangerous solutions for bicycling and pedestrian traffic. | Zero allocation of parking demand for Seaside Lagoon visitors, kayakers, and SUP'ers. Forcing recreational users with bulky and unwieldy equipment to park in parking structures. Dumb and dangerous design of new bike path through pier area. Commingling pedestrian and bike traffic. |
| Restore and enrich the community's connection to the Waterfront by providing improved connectivity to and along the Waterfront via enhanced pedestrian, bicycle, and motorized vehicle access, including the completion of a missing link in the California Coastal trail. | EIR does not adequately analyze the constraints of the traffic infrastructure. New Harbor Drive intersections and driveways will impede connectivity by automobile. Bicycle and pedestrian solutions are dangerous. Community connectivity is actually impeded. | Wall of development along Harbor Drive physically separates community from harbor. Bike path in pier area is a dangerous configuration. Commingling bike and pedestrian traffic is dangerous. |

The bias reflected in the statement and interpretation of project objectives results in a biased assessment of alternatives that better meet Coastal Act and Redondo local requirements and represent a viable, environmentally superior alternative. For example, Mole D is truly the superior alternative for boat ramp location. But the EIR uses the convenient application of the biased objectives to rule out this option.

## ALTERNATIVES ASSESSMENT:

The EIR evaluation of alternatives relies largely on subjective statements without substantiation, convenient interpretation of project objectives, and/or a loose discussion of fiscal viability.

**Fiscal impacts and viability** – The City rests on its desire to have most of the public infrastructure funded by the developer. The City ignores other funding alternatives that are fiscally viable. These alternatives would allow the city to achieve an environmentally superior project that better balances commercial development and its impacts to coastal dependent uses of the harbor. City Staff are aware of these alternatives. A City Staff Report dated January 19th, 2016 and the attached consultant assessment from KNN clearly demonstrate that the City understands there are other funding alternatives. Testimony from KNN representative and his responses to the Council also demonstrate City Council and staff understand that there are many fiscal options. The public, particularly Mr. Martin Holmes, have testified to examples of more balanced development achievable with the city funding more infrastructure costs through a viable debt structure.

For example, the city's engineering consultant, Walker Restoration, told city council on 19 January 2016 that the city could extend the parking structure infrastructure life another 15 years for $18 million in maintenance or rebuild the parking structure entirely for $50 million. At that meeting city staff claimed that total infrastructure repairs ranged from $37.5 million to $108 million. Meanwhile the city financial consultant, KKN Public Finance, provided four financing options that would provide the city with funding to complete the necessary infrastructure repairs. One attractive option used $3 million annual profit from the Harbor Enterprise as

leverage to secure $54 million for upgrades. Since that $54 million of financing falls within the $37.5 - $108 million range, it is clear that the city could finance infrastructure upgrades if they chose to do so. The city is not forced to approve the CenterCal plan as its one and only method to pay for the infrastructure. There are other options.

Some might claim that using the $3 million annual Harbor Enterprise profits to pay for the infrastructure would remove that money from the general fund and strain city resources. That claim is suspect. At the 3 August 2016 CenterCal open house, CEO Fred Bruning told the audience that he believes the 524,000 square foot project would bring $6 million to the city a year through rent, sales tax, and property tax. Presumably a half-sized 262,000 square foot project could yield $3 million a year to the city. Therefore if the city chose to finance the $54 million of infrastructure on their own, the $3 million cost of financing could be balanced with $3 million income from the half-sized project. The half-sized project would revitalize the infrastructure and businesses without over developing the harbor. The negative impacts could be mitigated with a smaller, balanced development without straining the city budget. That would be a true public-private partnership. Such an option was also examined in the reduced density alternative. This alternative was explained away as infeasible and convenient interpretations of project objectives were used to further rule out this option.

The public cannot provide more detailed assessment as the city has not yet released the details of the terms of agreement with CenterCal including lease agreements, parking revenue agreements, infrastructure cost funding agreements, and similar pertinent items.

The Harbor Commission staff wrongly approved the EIR without having access to this critical data which would have allowed an informed assessment of the alternatives and their feasibility.

Additionally, city staff has suddenly changed its story on fiscal viability of a Mole C boat ramp. Suddenly, after more than 2 years of deliberation, the Joe's Crab Shack lease is an issue. The lease has not changed. Yet the City has provided no explanation as to why this is suddenly an

insurmountable fiscal impact. This impact should have been known and evaluated in the DEIR. And on the same issue, the City ignores a less costly AND less impactful boat ramp location: Mole D.

**Site Connectivity** – The city uses the objective of site connectivity to eliminate a Mole D boat ramp alternative. Yet the City itself supports the opening of Seaside Lagoon to the harbor which creates the same type of break in site connectivity that a Mole D boat ramp would. This demonstrates the City's lopsided use of this objective in evaluating a Mole D boat ramp. Just as is the case with the opening of Seaside Lagoon, the public promenade could include public view decks on both sides of the ramp, and a continuation of the promenade behind the ramp. Commercial development connectivity could easily be achieved with the commercial development in the area of the current R-10, Captain Kidd's, and Marina offices. This example shows the bias that has permeated the City's assessment of alternatives. What is deemed acceptable for what the city advocates, is suddenly unacceptable in other alternatives.

## SUPERIOR ALTERNATIVES:

The "Reduced Density Alternative" is a viable and environmentally superior solution. The City has applied its bias in evaluating this alternative. This alternative should be reevaluated with a less biased assessment against project objectives. This alternatives achieves a better balance as required by CEQA Guideline 15021.

On June 28th, prior to EIR release, residents submitted an initiative they named the King Harbor CARE Act. This initiative provides additional zoning requirements that can be used to assess an environmentally superior alternative. The King Harbor CARE Act specifies zoning details that would address most of the concerns expressed in this document. It forces a better balance of commercial development and its impacts on coastal dependent recreational uses. The City should consider an alternative that conforms with this initiative. While a City Consultant stated the "Reduced Density Alternative" essentially evaluates the King Harbor CARE Act, that is

not accurate. The reduced density alternative included development that would violate the King Harbor CARE Act. This alternative should be evaluated by the city.

During Harbor Commission deliberations, BBR presented an environmentally superior alternative that was not addressed or assessed. BBR presented the following as a superior and better balanced alternative to the massive development and understated impacts of the city staff recommended alternative or primary project description:

- Full sized or expanded Seaside Lagoon preserving or expanding current public open space land and water area within park. Swimming/wading/play water feature with sand bottom and direct beach access for at least a portion of the facility separate from harbor waters. 250 surface level parking spots contiguous with boundary of park. City shall explore land area and facility expansion to include a non-profit or public aquatic facility for storing, teaching, and renting human powered watercraft.

- Separate human powered boat launch with current facility road access and gradual sloping ramp to sand bottom from existing road. A minimum of 50 spaces nearby surface level parking for users.

- Two lane boat ramp on Mole D at or around Samba with a minimum of 60 trailer spaces through the southern end of the mole to preserve views from Czuleger Park. Retain operational boat hoist. Boat ramp shall not adversely impact existing recreational uses of harbor.

- Pedestrian Promenade to be built up to each side of the Mole D boat ramp with observation pad on either side. Promenade to have two paths – one across boat ramp, for low utilization periods and one from boat hoist area to Sportfishing pier area for busy ramp periods.

- Retention of Sportfishing pier and all slips in Basin 3. No reduction in slips permitted for this project. 120 parking space shall be allocated for basin 3 in close proximity to slips

and without crossing an active road. 60 surface level parking spaces shall be allocated for the Sportfishing pier fishermen and public disembarking on Sportfishing or whale watching vessels in close proximity to the Sportfishing pier. Accommodation of a tall ship at the sport fishing pier shall be investigated and implemented if feasible.

- Pedestrian bridge permitted but not required. Must be able to open within 10 minutes of call up for any vessel seeking access or egress to Basin 3.

- Bike path through project must connect directly with bike track without crossing east to west or visa versa.

- No new parking structure is permitted in the harbor area. No new public road shall be established connecting Harbor Drive to Torrance Blvd. And access road for public safety vehicles is permitted.

- Market Hall is permitted either in the vicinity of the pier parking structure or at the location of R10, Paddle House, Captain Kidd's, and Marina office area.

- Commercial development increase is permitted as allowed by Measure G and the other requirements stated in this alternative. Parking and traffic to be able to serve peak concurrent uses of all commercial development. Parking to be segregated from recreational/commercial coastal dependent uses. No sharing is permitted between general commercial development and recreational/commercial coastal dependent uses except that recreational users may use commercial parking.

- Redevelopment of International Boardwalk is permitted.

- Mole B to be developed per existing Master Plan.

- At least 40% of current views from Harbor Drive to be preserved including views of harbor, ocean, PV coastline and Catalina Island.

# STATEMENT OF OVERRIDING CONSIDERATIONS ASSESSMENT:

Comments to the Statement of Overriding Considerations

| Section | Statement | Issue | Resolution |
|---|---|---|---|
| 1 | Resident testimony on business activities | City cherry picks comments and ignores comments related to near capacity utilization of pier and harbor area facilities. **Council and public cannot verify this claim without real data.** | Findings about business activities should be based on statistics - vacancies, revenues, etc year over year. |
| 1 | Enhancements include a small boat ramp | Key details of boat launch ramp including impacts and capacity are still in discussion. **How can the city make this claim while still deliberating on key boat ramp details and potential impacts to long standing recreational uses of the harbor?**<br><br>**Statement shows City has determined conclusions in absence of evidence.**<br><br>**Council and public cannot determine whether city claim is factual.** | Assessment cannot be concluded until key details of the ramp are finalized. |

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| 1 | Enhancements include Seaside Lagoon configuration | City provides no analysis that Lagoon reconfiguration would increase use or even sustain current use. City has not provided analysis of harbor water quality except on one day. Proposed development shrinks usable wading and land area and eliminates key recreational attributes that even the city has stated made the attraction unique. Proposed project makes parking inconvenient and cannot accommodate buses from groups. Proposed solution introduces hazards to toddlers that would be a deterrent to use. City staff has admitted reconfiguration would eliminate day camp utilization. **Without this data the Council and public cannot verify this claim.** | Conduct year round study of harbor water quality wrt public health/ swimming activities. City to address areas of concern and demonstrate reconfiguration is a true enhancement that would continue to annually attract over 80,000 daily visitors (families bringing their children to enjoy the water feature), provide day camp for nearly 600 children. |
| 1 | Enhancements to bike path | Proposed solution includes 3 new dangerous road crossings after taxpayers just spent over $4M to eliminate this hazard on Harbor Drive. Proposed bike path does not connect with bike track, it is on the wrong side of the street<br><br>Proposed commingled bike/ pedestrian path is a hazard not an enhancement. City staff reports show recognition of danger when commingling bike traffic with pedestrian traffic particularly with visitors. | Current condition is safer. City should rectify the dangerous design prior to making claims of enhancement. City should require more view protections and decrease height and massing so close to bike path at both ends of the project. |

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| | | Proposed solution eliminates ocean/harbor views and puts the bike path in shadows in the early afternoon.<br>Tall development extremely close to bike path is a deterrent and ruins the experience of riding next to the harbor and pier. **Evidence presented in public comments contradicts city findings. Council should not accept this statement without project changes.** | |
| 1 | Enhancement to pedestrian paths on waters edge. | Enhancement is overstated. Commingling with bike traffic is hazardous. Despite EIR claims to the contrary people can and do access the waterfront throughout the site today. | Eliminate hazardous commingling of bike and pedestrian traffic. Make factual statements about current levels of accessibility. |
| 1 | AECOM report | City fails to admit the report highlighted significant risks . competition and lack of visibility. Consultant testified that he did not analyze impact of limited traffic infrastructure. City study showed a minor underperformance of the development would result in negative city cash flow. The City has not released the details of leasing and other key financial terms to the public or to the Council. **The Council cannot assess the citys claim without this critical information.** | Release city financial terms and conditions with the applicant. Release city financial analyses. |

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| 2 | Increased net financial return, funding of infrastructure upgrades | The city has not provided a recent assessment of return to the public. Early assessments show potential for a negative cash flow for a relatively minor underperformance of the project. City has not released critical details to verify this statement such as lease term agreements and other financial agreements with the applicant; commitments as to which party is responsible to fund what infrastructure enhancements. **City ignores other potential funding sources and combinations of strategies that achieve infrastructure upgrades without far less impact to coastal dependent uses than the current project. Council and Public have not been provided the information to validate this claim by the city.** | Provide details to the Council and to the public. Demonstrate that less impactful alternatives are not feasible. |

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| 3 | Development Cap | City has provided convenient interpretation of Measure G zoning that excludes new parking structure development. This interpretation was not before the voters when<br><br>Measure G was put on the ballot. The average voter would have no reason to believe that the development cap did not include the huge new parking structure. The voter intent is what should prevail in interpreting the zoning since it was only effective withvoter approval. Project violates zoning cap with this reasonable interpretation. **Council should reject project until it conforms to development cap.** | City should produce evidence that the information in front of the voters clearly demonstrated that parking structures were excluded from the Measure G development cap. |

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| 3 | Effectuate goals and objectives of LCP | Project is lopsided and unbalanced. The city has pencil- whipped their assessment of impacts to coastal dependent recreational and commercial uses, views and accessibility. Evidence produced by the public shows the substantial negative and unmitigated impacts. The city prioritized the non-coastal dependent commercial development over coastal dependent uses. The city ignored goals related to massing and scale. Even if the city did correctly interpret the development cap, the goals and objectives stated in the LCP would prevent concentrating 72% of the development cap for the whole harbor into much less than 22% of the harbor area. **Council have been presented evidence showing the city assessment to be inaccurate. Council should reject the statement and the project and force the project back for better balance and compliance.** | Reject the project as presented. Send it back for redesign in compliance balancing all goals and objectives of the LCP. |
| 3 | Bicycle oriented development | This statement is simply inaccurate. The proposed bike path, the location of new driveways and parking structure exits and entrances are all designed to prioritize automobile access by customers of the commercial development. **Council should reject this false statement.** | Redesign bike path, driveways, and parking structure entrances and exits to prioritize bike traffic. |

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| 3 | Equal open space | The EIR counts mall accoutrements, pedestrian pathways, and open space and landscaping that is unusable or undesirable for public use in order to trump up the claim that eliminating 1/3rd of the current usable public parkland is not a significant impact. To add insult to injury, the reduction in public parkland is primarily due to the installation of a public road whose primary purpose is circulation in the commercial development. **Council should reject this misleading assessment and claim.** | Redesign the project to preserve all of the usable open space of the existing public park land. The City and Measure G proponents advertised that Measure G would save Seaside Lagoon park from development ·forever·. This design does not reflect that commitment to the public. |
| 3 | Surface level parking | City refuses to acknowledge that every harbor and marina needs surface level parking. The loss of convenient parking is a deterrent to access to coastal dependent uses and thus violates our LCP and the Coastal Act. **Council should reject this claim and assessment.** | Redesign the project with adequate and convenient parking for long established and any new coastal dependent uses, including the required boat ramp. |
| 4 | CenterCal "most qualified" applicant | Subjective assessment. CenterCal has never performed a waterfront project or a resort. Other applicants had. CenterCal expertise is retail development. Not harbors and piers. **Council should reject this subjective and unsupported statement.** | Correct statement. |

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| 4 | Highest and best use | The City is charged with applying the Coastal Act to these public lands not ensure "highest and best use". The harbor is public property largely managed on behalf of the residents of California. Per the Coastal Act, the City's objective should be to protect this limited resource paid for with taxpayer money's for the uses for which it was primarily built. The harbor is the only one in 25 miles of coastline. It was built to provide coastal dependent boating and recreational access to the ocean. That is the highest and best use in this case.<br><br>Commercial development should be a secondary and complimentary use to support the primary raison d'etre. **Council should reject this statement as it does not accurately reflect the responsibilities of the city and the commitment required by the LCP and Coastal Act.** | Delete statement |
| 4 | New annual tax revenue | The city keeps repeating this, yet it has provided no public substantiation. The city has not released financial terms with CenterCal. Previous analysis showed a negative cash flow with relatively minor underperformance by the commercial development. **Council should reject this statement as the city has not provided the necessary evidence to support it.** | City should make the details of the financial agreements with the applicant and the analyses of revenues and costs through construction and out through operation. |

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| 5 | Restore community's connection with the waterfront | Pacific Avenue reconnection . contradicts previous statements about a bicycle and pedestrian oriented development.<br><br>Pedestrian bike connectivity already exists and is well used despite city claims to the contrary. **Council should require the statements to be more accurate. However, this objective does not justify the significant impacts of the project and the Council should reject this statement in supporting that conclusion.** | Statement is not justification for significant impacts to long standing and well used coastal dependent uses of the harbor. |

## ASSESSMENT OF FINDINGS

**Assessment of Finding that the Staff Recommended Alternative is not significantly different from those analyzed in the Draft EIR.**

This finding does not hold water. The DEIR eliminated Mole B as a potential boat ramp site due to the environmental impacts including:

- Significant impacts on emergency services
- Disruption of ingress and egress for land vehicles from the Harbor Patrol buiding
- Eliminating use of the helipad
- Removal of boat slips

- Removal of marina parking stalls
- Removal of section of Moonstone Park

Because it ruled out Mole B from the start, the DEIR is incomplete in any more detailed assessment of the Mole B option.

The proposed reconfiguration of a Mole B Boat Ramp is still undergoing changes and is not included in or assessed by the Final EIR. But even as it undergoes changes the evolving configuration still includes the significant impacts above and adds the potential of shutting down operations of the Lanakila and Nahoa Outrigger Canoe clubs that have been on Mole B since 1970. These clubs are growing, with Lanakila having grown to over 300 members. They provide free paddling opportunities to members of the public and serve as a strong coastal dependent recreational resource for all ages.

The Commission's finding cannot be true. The DEIR found that the impacts of a Mole B Boat Ramp were significant. And now the EIR and the Commission's approval of the EIR conclude magically that what was once a significant impact is no longer an impact. In fact, the proposed configuration exceeds the impacts evaluated in the EIR.

This finding should be voided. And the EIR should be rereleased in compliance with CEQA requirements. The final solution is one the DEIR explicitly voided as too impactful. Added to this is the fact that the final configuration is evolving... neither the public nor the Commission can know what the true impacts really are.

**Finding of adequate street access**

Details submitted in the traffic section of this document show that the at traffic analysis is flawed. Conditions today along Harbor Drive are worse than predicting by the traffic analysis after full project build out. The EIR has not identified or required any mitigations that would affect the traffic issues documented on Harbor Drive. Therefore, the only conclusion is the

significant impacts experienced today will only get worse with the increased traffic of the project.

**Finding of no adverse affect on abutting properties.**

Abutting properties with visitor serving commercial and recreational uses suffer blocked views, traffic gridlock, noise, and a massive wall of development. Czuleger Park visitors will have views blocked by diners at the Market Hall and guests swimming at the rooftop pool of the hotel.

**Finding that the Project conforms to the LUP, LCP and zoning.**

As shown throughout this document, the project does not conform with the requirements of the LUP, LCP, zoning, and the California Coastal Act.

## HARBOR COMMISSION DESIGN REVIEW ASSESSMENT

Harbor Commission design review approval failed to adequately consider the criteria and enforce the purpose for the design review as required by Redondo Beach Municipal Code 10-2.2502. These include the assessment of the massing and scale of the development, traffic congestion and traffic visibility, pedestrian safety, design compatibility, impacts to public health and safety, enhancement of visual quality of the neighborhood, avoiding box like appearance, and ensuring appropriate physical proportions. The preceding sections of this document clearly show the project design does not meet these criteria and the Harbor Commission did not adequately assess the project in light of each of these criteria as they passed it without substantive change.

## MASTER CONDITIONAL USE PERMIT ASSESSMENT:

The Harbor Commission made numerous changes to the CUP late at night long after most of the public had left the public meeting. As of the date of this document, the final CUP

language was unavailable for public review. A video of the public meeting is not available for public view either on the City's website.

## CITY OFFICIALS HAVE BECOME BIASED ADVOCATES FOR THE PROJECT

Mayor Aspel appears in the promotional video produced by CenterCal. He also stated at his annual State of the City address that those opposed to the project were a "sour grapes organization". From a Beach Reporter article by Kelcie Pegher on February 2, 2016 in an article entitled "Redondo Beach Mayor Steve Aspel pokes at opponents during State of the City address":

*" 'There's a group – they call themselves grass-roots. They're not a grass-roots organization. They're a sour grapes organization,' Aspel said, a not-so-subtle dig at Rescue Our Waterfront, billed as a community group supporting a 'more balanced revitalization' of the waterfront."*

Mayor Aspel vetoed a council approved discussion about putting the project to a vote of the people. And he subsequently he vetoed a council approved simple financial assessment of CenterCal.

At the Chamber of Commerce meeting where he announced he was running for mayor again, Aspel stated, *"If it were up to me we would be digging holes and getting bulldozers out there right now with our partner CenterCal."*

Councilmembers Horvath and Emdee lobbied to have Hermosa's city council hear CenterCal's marketing pitch on their project. Both attended the Hermosa Council pitch by CenterCal. And Councilmember Emdee presented an advocacy briefing to the Independent Cities Association on June 25th, 2016. The slides she presented included headings like "A Bright Tomorrow" and with the exception of three slides, all slides were CenterCal marketing slides with CenterCal logos. On one of the three slides that were not from a CenterCal

marketing pitch, Council member Emdee misrepresented the city's options as essentially do the Waterfront project as described or get a voter financed infrastructure bond. City consultant KKN provided an assessment that projected a variety of options for city financing. This report is in a staff report to City Council date January 19th, 2016. However, Emdee only chose to include the most politically distasteful option.

Similarly we find City staff cherry picking data that supports their desired conclusions supporting the development while ignoring blatant evidence to the contrary as has been pointed out throughout this report. The bias is evident in the inconsistencies in evaluating impacts of the city recommended alternative and previous documented findings on similar situations. The following table shows several examples of impact determination inconsistencies:

| Impact | Previous finding | Waterfront Project Finding |
|---|---|---|
| Visual impacts | Heart of the City – similar wall of development deemed significant impact | Not significant |
| Bike path crossing Harbor Drive | Bike Track project – dangerous conflict and connectivity issue | Concludes more crossings improves safety |
| Bike path parking lot crossings | EIR – current path parking garage single vehicle crossing – hazardous | EIR – multiple new driveway and parking garage crossings – safe |
| Bike pedestrian commingling | Analysis of bike path signage in parking structure – commingle dangerous at peak times | EIR – safe. City might limit hours later. But takes credit as increasing bike access |
| Boat maneuvering | DEIR Mole D assessment – turn basing proximity to commercial boats docking at Sportfishing Pier – Hazardous, significant impact | Mole B EIR assessment – proximity to recreational boats and SUP's in narrow busy fairway – no safety concern, no impact |

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| Parking | MarVentures Lease – parking spaces numerically set aside for Seaside Lagoon, Sportfishing boats and boat slips in Basin 3, Seaside Lagoon overflow parking at Triton oil site. | EIR – No parking assessed for recreational users. Claims they are accounted for in commercial use parking requirements |
| Seaside Lagoon | Parks and Rec Element of General Plan, HOC EIR – Unique regional resource that should be preserved and expanded | Eliminate unique elements combine it with SUP/Kayak launch, pave over a third for parking – "enhancement" |
| Site Connectivity | EIR is silent on break in waterfront promenade at the proposed reconfiguration of Seaside Lagoon wrt project objectives. | EIR uses the interruption of the waterfront promenade as a violation of project objectives. Arbitrarily concludes pedestrian bridge would not be built. Ignores that commercial could still be configured to create contiguous connectivity. |

When one looks at the hard to follow format of the EIR (which is different than any previous EIR the city has produced), the lack of specificity in what is supposed to be a project EIR, the major changes even post EIR release, the attempt to segregate the boat ramp evaluation from the rest of the project, the inconsistent assessment of impacts, and the refusal to engage the public on the major changes, one can easily draw the conclusion that City staff and elected proponents have become advocates for the project and have lost their objectivity.

**This process should be stopped. The project should be fully and properly documented complete with the required boat ramp. The impacts should be reevaluated using reasonable evidence. And the entire EIR should be rereleased as a draft for a full and proper public review.**

**But more importantly, the project should be sent back to the drawing board.**

**Recreational and coastal dependent uses should be prioritized as required by state and local law. The boat ramp should be designed and placed to provide adequate capacity and a safe solution. And after those are done, the commercial development should be designed around those solutions and in compliance with local and state laws, regulations and requirements. This would achieve the balance demanded by CEQA Guideline 15021.**

Appellants James A. Light, et al. hereby submit the following addendum to our appeal, which provides further explanation and clarification for several points and issues with respect to our contention that the Harbor Commission abused its discretion when it certified the final environmental impact report for the Waterfront project.

**BUILDING A BETTER REDONDO'S STANDING IN THIS CASE:**

Building a Better Redondo, Inc. is a California nonprofit corporation dedicated to preserving and enhancing resident quality of life in the City of Redondo Beach and the surrounding South Bay communities; promoting participation of City residents and community organizations in City land use and zoning proceedings and in activities aimed at preserving and improving resident quality of life for the enjoyment of all citizens; educating the public on the scope and the adverse effects associated with the rezoning in the Harbor area; and defending and enforcing the public's desire and right to vote on this rezoning and all other major changes in allowable land use as may be approved by the City Council. BBR's directors and officers all are City residents, electors and taxpayers. BBR also played an instrumental role in ensuring the successful passage of measure DD and obtaining a court order commanding the City Council to place Measure G on the November 2010 ballot.

**IMPACT UTL-2:**

The water supply assessment in appendix M contains a fatal methodological flaw. When calculating available potable water supply after a period of multiple dry years, the analysis states, without explanation, that "demand is assumed to decrease by 15% of the estimated baseline demand for 2015." (Appendix M p. 28.) The analysis provides no basis for this assumption and provides no description of the factors that would actually reduce the demand. This assumption also conflicts with official projections for growth in the region; the Waterfront project alone will increase demand by 143.6 acre feet per year. (DEIR at p. 3.14-28.)

Based on this "assumed" decrease, Table 14 in Appendix M projects that the estimated drought demand will remain 11,400 acre feet per year for 2016 and 2017, while the supply is projected to be 11,864 acre feet per year for 2016 and 11,866 for 2017. (Appendix M p. 29.) However, since the 15 % decreased demand assumption is not predicated on fact and is unsubstantiated, i.e., cannot factor as "substantial evidence" (Pub. Resources Code, § 21082.2), the projected demand will actually be 13,411 acre feet per year. This far exceeds the projected available supply in Table 14 as well as the projections in table 7-4 (at page 86) of the Hermosa-Redondo District's 2015 Urban Water Management Plan, which estimates that only 12,978 acre feet per year will be available by 2020 after a third dry year.

Additionally, the projected *cumulative* impact of the project and other related demands in the Hermosa-Redondo system are projected to be 13,820 acre feet per year by 2020. (Table 3.14-10, DEIR p. 3.14-29.) This far exceeds both the projected supply listed in Appendix M as well as the projected supply listed in the District's 2015 Urban Water Management Plan. Therefore, the final EIR's conclusion that cumulative water supply impacts are insignificant has no factual or legal basis.

**IMPACT AQ-1:**

The SCAQMD has set daily construction and operational emissions thresholds for lead at 3 pounds per day. However, the EIR provides no information about the total quantities of lead emissions associated with this project. Instead, the EIR ends its analysis with the conclusory remark that "lead is not discussed further in this analysis" because "lead has been well below regulatory thresholds for decades and the proposed project is not a source of lead-based paint." (DEIR p. 3.2-9.) This analysis ignores potential serious environmental impacts caused by emissions of lead form the project site. In fact, this analysis conflicts with the statement on page 3.7-5 of the draft EIR (in footnote 1), which states that "the project would involve demolition and renovation of existing on-site structures, which, due to their age, may contain asbestos and lead-based paints and materials . . . ." Additionally, studies have found that "soil lead levels are highest" in the areas around "busy streets." (See Rosen, *Lead in the Home Garden and Urban Soil Environment* at p. 1, available at <http://conservancy.umn.edu/bitstream/handle/11299/93998/2543.pdf?sequence=1&isAllowed=y>.)

Additionally, the cumulative impact analysis provides no quantitative comparison between emissions from the Waterfront project and emissions from other, neighboring sources in the neighborhood. Because there is no quantitative comparison, there is no way to know that combined emissions from this project and related projects are cumulatively insignificant.

**IMPACT GHG-1:**

In this portion of its Greenhouse Gas analysis, the EIR utilizes a two-part threshold of significance. At the time the EIR was drafted, this threshold had been *proposed* by the SCAQMD, though it was not formally adopted by the SCAQMD. The first part of the threshold analysis looks to whether the total project emissions per year divided by the total number of employees servicing the project exceeds 4.6 MTCO2e per year; if emissions exceed that threshold, they are considered significant. In other words, if there are 10 employees that service a project, the total annual emissions cannot exceed 46 MTCO2e per year. The second part of the threshold analysis looks to whether the ***total*** project emissions exceed 25,000 MTCO2e per year; if emissions exceed that threshold, they are considered significant.

As a preliminary matter, the thresholds that are utilized by this EIR are out-of-date. The 25,000 MTCO2e per year threshold was proposed by the Stakeholder Working Group in November 2009. (See DEIR p. 3.6-14.) In 2010, the SCAQMD's GHG CEQA Significance Threshold Working Group proposed a three-tiered system for GHG emissions thresholds. For "projects of all land use types" (Tier 3), the working group stated that CO2e emissions should not exceed 3,000 tons per year. The EIR projects that the net total emissions associated with the project will be equivalent to 5,072.66 MTCO2e per year, which far exceeds the 3,000 MTCO2e per year threshold. (DEIR p. 3.6-17.)

The EIR ultimately concludes that greenhouse gas emissions associated with the project do not rise above the threshold of significance because the per service population emissions will only equal 3.51 MTCO2e per year. (DEIR p. 3.6-17.) This is calculated by dividing projected net emissions increase of 5,041.82

MTCO2e per year by the projected net increase of 1,438 employees at the project site. (*Ibid.*) However, the EIR provides no explanation for or justification for its assumption that the project will include a net increase of 1,438 employees. (*See* DEIR p. 3.6-17.) If, for example, the project only brings in 1,093 new employees, then the per service emissions will actually be 4.61 MTCO2e per year, which would exceed the threshold of significance. Be

**IMPACT GHG-2:**

The Waterfront EIR uses the same methodology that was found to be "unsupported" and "misleading" in the California Supreme Court's recent opinion in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204 (***CBD***). In *CBD*, to determine whether the project's GHG emissions were significant, the EIR analyzed whether the emissions "would impede achievement of A.B. 32's goals" of reducing statewide emissions by 29% (from "business as usual" projections) by the year 2020. The EIR there determined that the project's estimated "actual annual" emissions were 31% lower than the project's business as usual (**BAU**) projections. Because the project's 31% reduction (below business as usual projections) was greater than the statewide goal of 29% reductions in GHG production by 2020, the EIR concluded that "the project's likely greenhouse gas emissions will not impede achievement of A.B. 32's goals and are therefore less than significant for CEQA purposes." (*Id.* at p. 218.) The California Supreme Court ruled that, as applied, this methodology did not support the EIR's conclusion that the project would have less than a significant environmental impact. Although the Court accepted the Department of Fish and Wildlife's choice of A.B. 32 consistency as a significance criterion, it ruled that there was no substantial evidence to support the EIR's conclusion that "*project-level* reduction of 31 percent in comparison to business as usual is consistent with achieving A.B. 32's *statewide* goal of a 29 percent reduction from business as usual . . . ." (*Id.* at p. 225, emphasis in original].) The Court emphasized that A.B. 32 did not equate the "*statewide* level of reduction effort[s] to the percentage of reduction that would or should be required from *individual projects*," and that "the required percentage reduction from business as usual" may be different "for an individual project as for the entire state population and economy." (*Id.* at pp. 225-226, emphasis in original.)

In this case, the Waterfront EIR makes the same error as the EIR in *Center for Biological Diversity v. Department of Fish & Wildlife*. First, it uses the California Air Resources Board's Statewide Scoping Plan's statewide goals as the basis for the GHG significance threshold for Impact GHG-2. The Scoping Plan set a reduction target of "15 percent below the BAU scenario for municipal emissions" by the year 2020. (DEIR p. 3.6-20.) The EIR compares "business as usual" projected total emissions and compares those to the projected totals for the "proposed project." (DEIR p. 3.6-19.) The EIR states that difference between the business as usual projections (32,421.44 MTCO2e per year) and the total emissions for the proposed project 2020 buildout scenario (24,586.70 MTCO2e per year) represents a 24.17% reduction in emissions from the business as usual scenario. (*Ibid.*) Because this total represents a greater reduction than the statewide goal of 15 percent, the EIR concludes that the greenhouse gas emissions do not constitute a significant environmental impact. (*Ibid.*) The very methodological error that vitiated the EIR in *CBD* vitiates the Waterfront EIR.

Furthermore, the EIR's selected 15% reduction target below the BAU scenario for municipal emissions is too low a threshold of significance, and we caution reliance on it at this time to determine the significance of the project's direct emissions, as well as cumulative greenhouse gas emissions. The EIR states that the 15% reduction target is based on *AB 32*, the landmark Global Warming Solutions Act of 2006, which required the state to bring down greenhouse gas emissions by 2020 to what they had been in 1990. But the new target for reducing the state's emissions of greenhouse gases is *40% below 1990 levels by 2030*. On April 29, 2015, California's Governor Jerry Brown issued an executive order to set this new target (Executive Order B-30-15.) So does *SB 32*, as it requires the Air Resources Board to approve statewide greenhouse gas emissions limits equivalent to 40% below 1990 levels by 2030. SB 32 has already been approved by the Assembly Appropriations Committee.

# Referenced Material

Comments to the Statement of Overriding Considerations

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| | | track, it is on the wrong side of the street. Proposed commingled bike/pedestrian path is a hazard not an enhancement. City staff reports show recognition of danger when commingling bike traffic with pedestrian traffic particularly with visitors. Proposed solution eliminates ocean/harbor views and puts the bike path in shadows in the early afternoon. Tall development extremely close to bike path is a deterrent and ruins the experience of riding next to the harbor and pier. **Evidence presented in public comments contradicts city findings. Commission should not accept this statement without project changes.** | project. |
| 1 | Enhancement to pedestrian paths on water's edge. | Enhancement is overstated. Commingling with bike traffic is hazardous. Despite EIR claims to the contrary people can and do access the waterfront throughout the site today. | Eliminate hazardous commingling of bike and pedestrian traffic. Make factual statements about current levels of accessibility. |
| 1 | AECOM report | City fails to admit the report highlighted significant risks – competition and lack of visibility. Consultant testified that he did not analyze impact of limited traffic infrastructure. City study showed a minor underperformance of the development would result in negative city cash flow. The City has not released the details of leasing and other key financial terms to the public or to the commission. **The Commission cannot assess the city's claim without this critical information.** | Release city financial terms and conditions with the applicant. Release city financial analyses. |
| 2 | Increased net financial return, funding of infrastructure upgrades | The city has not provided a recent assessment of return to the public. Early assessments show potential for a negative cash flow for a relatively minor underperformance of the project. City has not released | Provide details to the Commission and to the public. Demonstrate that less impactful alternatives are not feasible. |

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| | | critical details to verify this statement such as lease term agreements and other financial agreements with the applicant; commitments as to which party is responsible to fund what infrastructure enhancements. **City ignores other potential funding sources and combinations of strategies that achieve infrastructure upgrades without far less impact to coastal dependent uses than the current project. Commissioners and Public have not been provided the information to validate this claim by the city.** | |
| 3 | Development Cap | City has provided convenient interpretation of Measure G zoning that excludes new parking structure development. This interpretation was not before the voters when Measure G was put on the ballot. The average voter would have no reason to believe that the development cap did not include the huge new parking structure. The voter intent is what should prevail in interpreting the zoning since it was only effective with voter approval. Project violates zoning cap with this reasonable interpretation. **Commissioners should reject project until it conforms to development cap.** | City should produce evidence that the information in front of the voters clearly showed that parking structures were excluded from the Measure G development cap. |
| 3 | Effectuate goals and objectives of LCP | Project is lopsided and unbalanced. The city has pencil-whipped their assessment of impacts to coastal dependent recreational and commercial uses, views and accessibility. Evidence produced by the public shows the substantial negative and unmitigated impacts. The city prioritized the non-coastal dependent commercial development over coastal dependent uses. The city ignored goals related to massing | Reject the project as presented. Send it back for redesign in compliance balancing all goals and objectives of the LCP. |

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| | | and scale. Even if the city did correctly interpret the development cap, the goals and objectives stated in the LCP would prevent concentrating 72% of the development cap for the whole harbor into much less than 22% of the harbor area. **Commissioners have been presented evidence showing the city assessment to be inaccurate. Commissioners should reject the statement and the project and force the project back for better balance and compliance.** | |
| 3 | Bicycle oriented development | This statement is simply inaccurate. The proposed bike path, the location of new driveways and parking structure exits and entrances are all designed to prioritize automobile access by customers of the commercial development. **Commissioners should reject this false statement.** | Redesign bike path, driveways, and parking structure entrances and exits to prioritize bike traffic. |
| 3 | Equal open space | The EIR counts mall accoutrements, pedestrian pathways, and open space and landscaping that is unusable or undesirable for public use in order to trump up the claim that eliminating 1/3rd of the current usable public parkland is not a significant impact. To add insult to injury, the reduction in public parkland is primarily due to the installation of a public road whose primary purpose is circulation in the commercial development. **Commissioners should reject this misleading assessment and claim.** | Redesign the project to preserve all of the usable open space of the existing public park land. The City and Measure G proponents advertised that Measure G would save Seaside Lagoon park from development "forever". This design does not reflect that commitment to the public. |
| 3 | Surface level parking | City refuses to acknowledge that every harbor and marina needs surface level parking. The loss of conveninent parking is a deterrent to access to coastal dependent uses and thus violates our LCP and the Coastal Act. **Commissioners should reject** | Redesign the project with adequate and convenient parking for long established and any new coastal dependent uses, including the required boat ramp. |

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| | | **this claim and assessment.** | |
| 4 | CenterCal "most qualified" applicant | Subjective interpretation. CenterCal has never performed a waterfront project or a resort. Other applicants had. CenterCal expertise is retail development. Not harbors and piers. **Commissioners should reject this subjective and unsupported statement.** | Correct statement. |
| 4 | Highest and best use | The harbor is city property largely managed on behalf of the residents of California. The City's objective should be to protect this limited resource paid for with taxpayer money's for the uses for which it was primarily built. The harbor is the only one in 25 miles of coastline. It was built to provide coastal dependent boating and recreational access to the ocean. That is the highest and best use in this case. Commercial development should be a secondary and complimentary use to support the primary raison d'etre. **Commissioners should reject this statement as it does not accurately reflect the responsibilities of the city and the commitment required by the LCP and Coastal Act.** | Delete statement |
| 4 | New annual tax revenue | The city keeps repeating this, yet it has provided no public substantiation. The city has not released financial terms with CenterCal. Previous analysis showed a negative cash flow with relatively minor underperformance by the commercial development. **Commissioners should reject** | City should make the details of the financial agreements with the applicant and the analyses of revenues and costs through construction and out through operation. |

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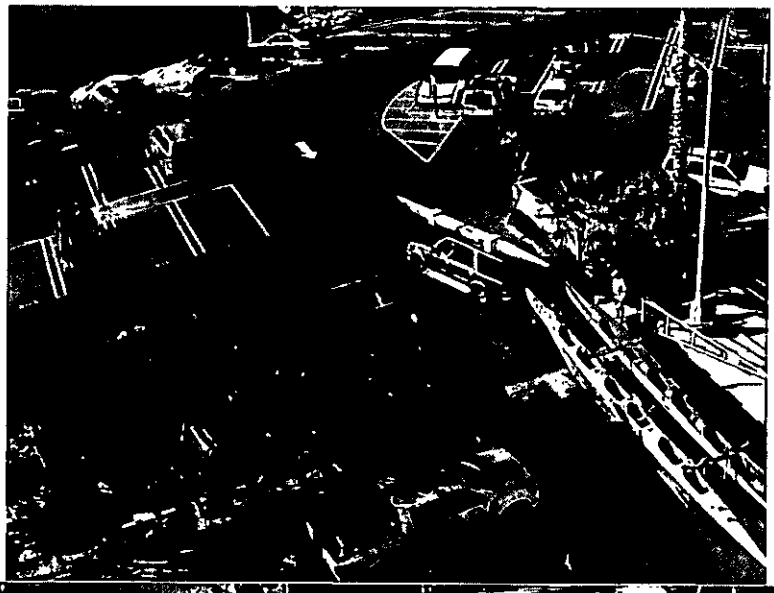
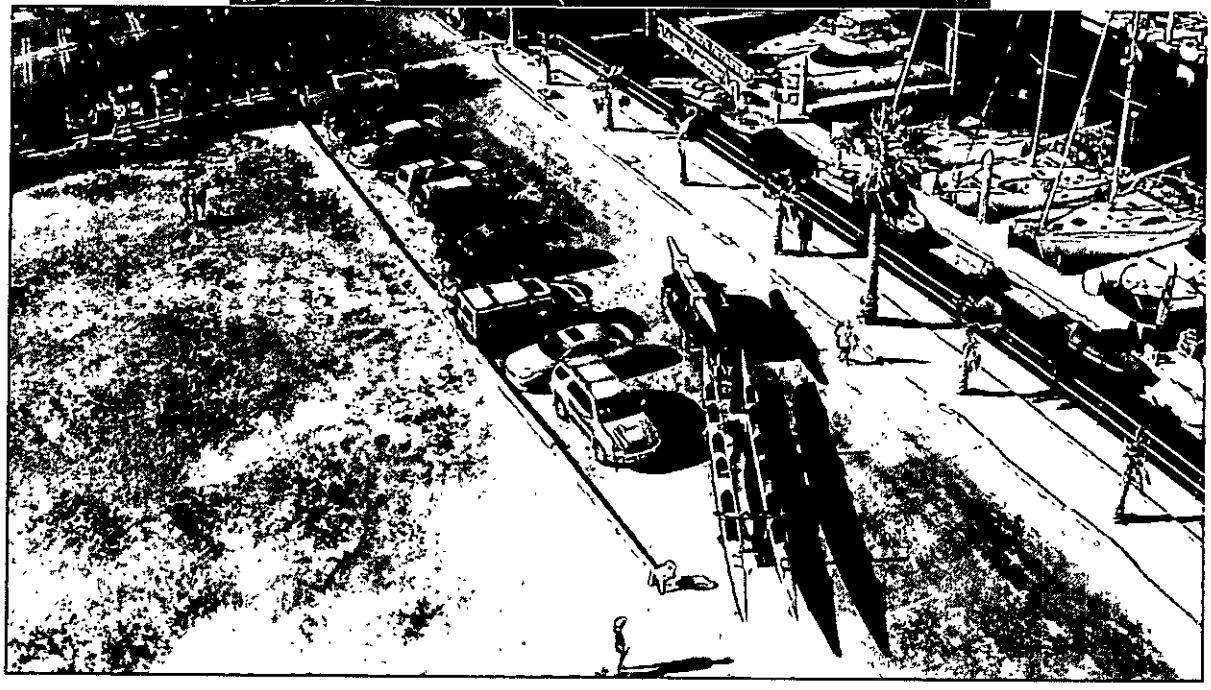
| | | **this statement as the city has not provided the necessary evidence to support it.** | |
| 5 | Restore community's connection with the waterfront | Pacific Avenue reconnection – contradicts previous statements about a bicycle and pedestrian oriented development. Pedestrian bike connectivity already exists and is well used despite city claims to the contrary. **Commissioners should require the statements to be more accurate. However, this objective does not justify the significant impacts of the project and the Commission should reject this statement in supporting that conclusion.** | Statement is not justification for significant impacts to long standing and well used coastal dependent uses of the harbor. |

Images from Lanakila Outrigger Canoe club show that parking that city staff have proposed be used for boat trailers is utilized for today by various harbor users. It also demonstrates the amount of maneuvering space required to navigate the Mole. The lower photo shows why the parking proposed by city staff in the Moonstone Park area would prohibit the club from moving their canoes to participate in races. While here they could clear the spaces normally used by Lanakila members, if you reduce parking the spots in this area would provide parking for those that rent slips and their guests – Lanakila could no longer ensure a safe route out of and into the outrigger storage area. The city is attempting to cram to many uses into too small a space.





Trade Only Today
DAILY NEWS FOR MARINE INDUSTRY PROFESSIONALS

# Boat sales up 6.8 percent in 2015

Posted on March 9th, 2016Written by Jack Atzinger

Growth in U.S. recreational boat sales slowed during the fourth quarter, but builders and dealers sold 15,477 more boats in all of 2015 than they did the year before, marking the fourth straight year of gains for the recovering industry.
Full-year sales rose 6.2 percent to 159,116 boats in the main segments and 6.8 percent to 244,116 industrywide from 2014, Statistical Surveys reported today.

The data are from all 50 states and include up-to-date reports from the Coast Guard on documented vessels, providing a complete picture of the industry's 2015 performance.

"It's continual moderate growth, like we've been seeing for the past few years," Statistical Surveys sales director Ryan Kloppe said.

Fourth-quarter sales were 5.3 percent higher in the main segments, but up just 2.8 percent overall, leaving the industry slightly below the high-end forecast of an 8 percent gain for the year.

Forecasts are for a sales gain of 5 to 6 percent this year.

"I think that is very doable," Kloppe said. "I think you'll see those segments continue to strive. The bigger-boat categories are doing well, and the mainstays continue to do so as well."

Three categories from the main segments — aluminum fishing and pontoon boats, and 11- to 50-foot fiberglass outboard boats — and personal watercraft carried the industry last year, accounting for more than 191,000 sales, or more than three-fourths of the nationwide total.

Fiberglass outboard boats were the top seller among the main segments: 47,021 were sold, an 8.7 percent gain from the prior year. A total of 45,104 fishing boats were sold, representing a 6.6 percent increase, and 44,406 pontoon boats were sold, giving that category a 6.9 percent gain.

PWC led all categories across the industry as 54,934 were sold. That segment was the only one that topped 50,000 sales.

Sales of ski and wakeboard boats rose 9.7 percent to 7,825 and jetboat sales climbed 24.9 percent — the highest percentage gain of any category — to 4,446.

The only category in the main segments that posted lower sales was 14- to 30-foot inboard and sterndrive boats, a lagging group that has shown signs of life in recent months. Sales in the category were 7.4 percent lower for the year, at 12,061.

Florida, which leads the nation nearly every month, finished the year atop the states with 29,252 sales. Texas was second with 21,129, Michigan was third with 13,530, Minnesota was fourth with 11,094, and Wisconsin was fifth with 10,214.

The rest of the top 10 were North Carolina (9,130); New York (8,612); Alabama (8,209); Louisiana (7,914); and California (7,469).

Among the top 10 states, only Louisiana had fewer sales in 2015 than the year before, and Kloppe said 18 of the top 20 exceeded their 2014 totals.

Sales in all three of the industry's bigger-boat categories were higher. Among 31- to 40-foot cruisers, sales rose 1.1 percent to 1,464. Sales of 41- to 65-foot yachts rose 10.6 percent to 1,045 and sales of 66-foot and larger yachts rose 8.6 percent to 190.

Sailboat sales fell 7.7 percent for the year to 2,411.

# Comments to The Waterfront Draft Environmental Impact Report

18 Jan 16

Submitted by:

James Light,
Building a Better Redondo,
Redondo Residents for Responsible Revitalization
Rescue Our Waterfront,
and the
South Bay Parkland Conservancy

on behalf of

The People of Redondo Beach
and
The Users of King Harbor and the Pier

R4

BUILDING A BETTER REDONDO
Quality and balance over quantity

RESCUE OUR WATERFRONT

South Bay Parkland Conservancy
LEAVING A LEGACY OF OPEN SPACE

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# 1. Executive Summary

**Bottom Line Up Front (BLUF)**

- The project definition is not mature enough for a Project Level DEIR.
  - The DEIR presents so many significant alternatives and options, it is impossible for the public to assess all potential combinations and permutations.

- The DEIR shows obvious bias toward the development

- The DEIR analysis is significantly flawed and much of it needs to be reaccomplished with better project maturity and definition

- The proposed project violates the Coastal Act, Redondo Beach General Plan, and the Local Coastal Program

- The project represents significant impacts to existing coastal dependent recreational and commercial uses of the harbor

- The project represents megalithic development on the waterfront. The harbor area takes an unfair brunt of the development as the development is increased by 1000%

- The reconnection of Torrance Blvd and Harbor Drive primarily serves through traffic while causing unavoidable and significant noise impacts to existing residential development, hotel guests and boaters in Basin 3.

- The proposed land swap with the State Lands Commission is not in the best interest of the People of California

- The project and the alternatives prioritize commercial development at the expense of existing coastal dependent recreational and commercial uses of the harbor

- There was insufficient time for the public to assess new studies published by the city on the evening of 15 January 16.

The wide implications of the project alternatives (particularly the boat ramp alternatives), the demonstrated significant impacts on coastal dependent harbor uses, the upcoming lease renewal for King Harbor Marina, the impending Hermosa Beach General Plan update, and the change in AES property status combined require the City to go back to the drawing board and develop an integrated plan for the entire waterfront. The DEIR does not reflect the combined impacts of all these concurrent land use changes in the immediate vicinity of the project.

An integrated plan would allow the opportunity to define an outcome that achieves the city's revenue goals while distributing impacts so that the coastal dependent uses are not unduly absorbing the substantial impacts of the final project(s).

Waterfront revitalization and increased revenue streams for the city can be accomplished without overdeveloping this relatively small area of the Redondo waterfront. Infrastructure maintenance and refurbishment funding tools and mechanisms have not been fully explored and vetted. Combining smaller changes over a broader area can accomplish the same objectives without the negative impacts and risk on our harbor and its coastal dependent uses. Additionally, ***new consultant studies related to the Pier Parking Structure condition and city financing options was just published by the city on the evening of January 15th. This data may affect the viability of less impactful alternatives, but there is insufficient time for the public to digest this new data.***

The Project Objectives are stated in such a way that any more reasonable and balanced alternative is automatically ruled out. The Project Objectives should be restated and the primary objective should be to truly increase and enhance coastal dependent recreational and commercial uses of our harbor. Anything else should be a means to that end.

### 1.1. Mitigations and requirements from the Measure G EIR

The Waterfront project results from a zoning ballot measure, Measure G, that established new zoning constraints on the project itself. Measure G used the approve Heart of the City Environmental Impact Report (HOC EIR) as its CEQA impact assessment. This EIR included specific mitigations and requirements that were not incorporated into the project.

### 1.2. Inadequate specificity of project and potential impacts

The Waterfront Draft Environmental Impact Report (DEIR) is meant to meet CEQA requirements for a specific project. Unfortunately, the project description and the assessed impacts in the DEIR are inadequate for the public to understand and evaluate the realistic impacts of the development. The project description provides a wide range of variability in the final project that results in a wide range of impacts. Examples of the wide variation of alternatives in the main body of the DEIR include:

- Potential elimination of the sport fishing pier
- Potential elimination of half the slips in Basin 3
- 8 alternatives of which the 8th includes 7 alternatives for boat ramp location internal to itself.

Boat ramp location is a substantial impact on the integrated assessment of project impacts. Thus the public would have to evaluate 56 potential variations of the project

just on the formal alternatives. And when one adds in the variables introduced by the sport fishing pier and slip elimination, that produces a whopping 224 major variations of the project. Obviously, the DEIR did not adequately evaluate the impacts of all the combinations and permutations afforded by substantive variables allowed in the project description. Therefore ***the public is not afforded the adequate time or information to assess the impacts of the potential project outcomes.***

Reasonable assessment of the project impacts requires a more final definition of the project and a much reduced subset of variables. ***This Project definition and impact assessment is not mature enough for impact evaluation and for the granting of development entitlements.***

### 1.3. Approach to comments to DEIR

The project was assessed assuming the primary project as assessed in the bulk of the DEIR: The Seaside Lagoon open to the harbor, the trailer boat ramp at the Joe's Crab Shack site and other items as depicted in plan views provided despite claims they may be altered. Comments that follow are limited to this assessment. ***There is insufficient data, time, means and information for the public to conduct any reasonable assessment of all the variation allowed by the project description and alternatives listed in the DEIR.***

### 1.4. Summary of issues and concerns with the DEIR

The following table provides an executive summary of the people's concerns and issues with the project as described and impacts evaluated by the DEIR.

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Project description | - Too many options and alternatives built into project description that could have substantive impact on the assessment of environmental impacts<br>- Is not an adequate definition of the project<br>- Project definition immature<br>- Impacts of alternative, particularly alternative boat ramp locations is not adequately assessed. | - ***Public cannot reasonably respond to all combinations and permutations possible***<br>- ***DEIR should be redone with more specificity*** |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Visual Resources | - DEIR cherry picks favorable views while ignoring obvious significant view impacts.<br>- DEIR contradicts findings in previous city EIR<br>- The lack of detail in the DEIR, combined with conflicting images, and convenient observation points makes it impossible for the public to evaluate view impacts and compliance. | ***Objective and reasonable conclusion is that there are significant view impacts.***<br><br>- Reaccomplish DEIR view assessments<br>- Redesign project to protect at least 50% of current views from Harbor Drive.<br>- Redesign project to protect harbor views from Czuleger Park. |
| Aesthetic Resources | - DEIR ignores massing impact<br>-weighs development over views | ***Massing ruins quaint feel of harbor and represents a significant impact.***<br>- Redesign project to reduce massing. Eliminate huge megalithic buildings. |
| Proposed California State Lands Commission land exchange | - Not in the best interest of the residents of California as it exchanges open waterfront space the city wants to develop for submerged land in Basin 3 is already protected as a navigable waterway by Federal Law | ***An alternative plan or land swap should be proposed that actually provides a benefit to the people of California*** |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Vehicular Traffic | - DEIR misrepresents increase in traffic<br>- DEIR ignores cumulative impacts<br>- DEIR failed to assess impact of short road segments and turning queue blockages of primary access roads<br>- DEIR failed to assess weekend traffic - peak traffic for both recreational and retail/restaurant/ entertainment uses<br>- DEIR failed to properly evaluate impact of traffic flow for new parking structure and complex intersection of Pacific, Harbor and the exit of the project in the harbor area<br>- New bike track produces significant impacts to Harbor Drive traffic capacity. Impacts are not adequately evaluated in the traffic assessment.<br>- Reconnection of Harbor Drive to Torrance Blvd primarily serves through traffic, not project internal traffic flow. | ***- Substantial reassessment of traffic impacts required to account for critical conditions of traffic infrastructure that represent significant limitations on capacity.***<br>***- Traffic impacts are worse than stated in the DEIR. Doubtful the stated mitigations will address all issues.***<br>***- Weekend traffic must be assessed.***<br>***- The reconnection of Torrance Blvd and Harbor Dr would primarily service through traffic. The impacts do not justify it. Eliminate the reconnection.*** |
| Bike Circulation - main bike route through project | - Proposed configuration requires bike traffic to oppose vehicle traffic flow on Torrance Blvd<br>- Proposed configuration requires two hazardous traffic crossings at complicated intersections exacerbated by new unfamiliar visitors<br>- Proposed configuration exacerbates loss of harbor views from Harbor Drive bike path | ***- Significant impact to bicyclist safety and views***<br>***- Project should be redesigned to eliminate dangerous double crossing of Pacific Ave and ensuring safety while riding against Torrance Blvd traffic flow***<br>- Project should be redesigned to protect at least 50% of current ocean and harbor views. |
| Bike Circulation - secondary route through project | - DEIR makes absurd assumption that heavy bike traffic and pedestrian traffic could commingle on same paths.<br>- Currently prohibited on similar areas of pier and harbor and Hermosa's pier area<br>- Would create hazardous conditions for pedestrians and bicyclists. Children would be at particular risk. | ***- Eliminate co-use of pedestrian paths by bicyclists for safety reasons.***<br>***- Redo DEIR assessment accordingly*** |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Parking | - Inadequate parking for trailer boaters at boat ramp - current zoning requires 67 double length trailer parking spots for boat hoist<br>- No parking requirements assessed for Seaside Lagoon visitors, paddle boarders, kayakers, pier fisherman, and passengers of whale watching and sport fishing commercial vessels.<br>- Inadequate parking location for slip leasers, paddle boarders, and kayakers. Current plan represents a deterrent to recreational uses of the waterfront. | - ***Significant impact to recreational use of harbor*** - Parking requirements are understated and inadequate for recreational uses of harbor waters.<br>- Additional spaces should account for growing SUP, kayak, whale watching, sport fishing, and Seaside Lagoon usage<br>- Parking should be reconfigured to support and encourage recreational uses of waterfront.<br>- Since putting in boat ramp is meant to increase trailer boat use, should accommodate 30 double length trailer spots per lane and single parking spaces for guests |
| Recreational Access - Traffic | - If properly evaluated, the traffic generated by the new development will impact access to coastal dependent recreational uses of the harbor<br>- Particularly around the Portofino Way, Harbor Drive intersection | - ***Negative impacts on coastal dependent recreation would be significant***<br>- ***Mitigations such as substantive increase in road capacity in the area or scaling back development should be implemented*** |
| Recreational Access - Parking | - Inadequate parking for trailer boaters at boat ramp<br>- No parking requirements assessed for Seaside Lagoon, Paddle boarders, kayakers, whale watchers, sport fishing vessel passengers, and pier fishermen.<br>- Inadequate/inconvenient parking location for slip leasers, paddle boarders, and kayakers. Current plan is a deterrent to recreational uses of the waterfront. | - ***Negative impact on coastal dependent recreation would be significant***<br>- Increase parking or decrease development<br>- Reconfigure parking to support and encourage coastal dependent recreational uses of the waterfront |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Recreational Amenities - reconfigured Seaside Lagoon | - Seaside Lagoon loses 1/3 of its usable open parkland to a road, parking spaces and 5 new retail/ restaurant lease spaces<br>- Previous EIR and zoning mandated Seaside Lagoon expansion<br>- Swimming pool, fountains, and slides are removed<br>- According to consultant, no lifeguards are planned<br>- Kids forced to swim in untreated harbor waters - the DEIR did not include any water quality testing of harbor waters at all.<br>- Area of harbor water entry known collector of floating trash<br>- Potential for sea lion use is understated. Mitigation plan approval by NOAA low probability as demonstrated on similar situations at other Southern California beaches<br>- Harbor waters not tested for water quality as part of the DEIR<br>- Swimming area of harbor is undefined. If just to end of current breakwater, swimming area will be much smaller than current lagoon. If larger, there is safety concern as turn basin as it is used by boaters to drop sail<br>- Tide dramatically affects usable land portion of park<br>- Tide affects usable swim area of park<br>- **Significant hazards** if boat ramp is located as shown in main analysis of DEIR - new breakwater would hide SUP'ers and kayakers to trailer boaters leaving breakwater<br>- Dredging of swim area has not been assessed, area shoals currently<br>- **DEIR wrongly assesses open space amenities in private commercial development make up for loss of public parkland and coastal dependent recreation** | - ***Impact to recreational use of Seaside Lagoon significant***<br>- ***Project creates hazards to coastal recreation not currently present***<br><br>**Mitigations should include**<br>- Preventing any new development from encroaching on the current park envelope<br>- Expanding parkland to adjacent Joe's Crab Shack site as stated in previous EIR<br>- Retaining a pool feature<br>- Retaining a water entry for kayakers and SUP'ers<br>- Relocating the trailer boat ramp or breakwater to mitigate safety hazard with SUP'ers and kayakers<br><br>**If the only swimming feature is to use harbor waters**<br>- Perform water quality testing so public understands the impact<br>- Evaluate impact of shoaling and frequency dredging would be required<br>- Require lifeguards<br>- Define swimming area and controls so that public can assess impact<br>- Perform tidal assessment to assess area changes in both swimming area and land area<br>- Assess number of daily users the reconfiguration could reasonably accommodate, ensure it meets or exceeds current capacity<br>- If beach entry retained, plan pre-approved by NOAA and state authorities to drive sea lions off the beach, so the public can evaluate the impact |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Hand launch boat ramp | - Insufficient parking to support current and growing number of SUP'ers and Kayakers<br>- Lack of access to safely offload equipment within reasonable distance to water entry/exit point<br>- Distances to parking create theft opportunities for expensive equipment - deters users<br>- Distances to parking and requirement to move equipment to and from parking structure and cross active road and active shopping and restaurant areas increases risk of injuries and damage to equipment<br>- If sea lions haul out, could lose ability to launch or return<br>- Sea lion haul out creates safety concerns and could prevent use of entry/exit point<br>- Proximity to trailer boat ramp presents a hazard to SUP'ers and kayakers. New breakwater creates blind spot for trailer boaters. | - ***Project represents a significant impact to a popular and growing use of the harbor***<br><br>**Mitigations should include:**<br>- Adequate reserved parking in close proximity to launch point without crossing active roads and shopping dining areas<br>- If beach entry retained, plan pre-approved by NOAA and state authorities to drive sea lions off the beach, so the public can evaluate the impact<br>- Locate trailer boat ramp to another part of the harbor or reconfigure breakwater to eliminate blind spots and dangers of mixing motor vessel traffic with human powered vessel traffic<br>- Alternatives that collocate hand launch with trailer boat launch should be prohibited. |
| Trailer Boat launch - primary location | - Inadequate parking for trailer boaters at boat ramp - current zoning requires 67 double length trailer parking spots for boat hoist<br>- Hazardous configuration and proximity to proposed hand launch boat beach access creates conflicts and blind spots<br>- Traffic uses will be concentrated on Portofino Way and Harbor Drive in this vicinity, creates access deterrent to trailer boaters<br>- Tight configuration of boat ramp area creates hazards that would substantially increase risk of damage to boats, trailers, vehicles and boat ramp infrastructure | - ***Project represents a significant impact to boating by creating hazards that do not exist today and by artificially limiting the capacity of the boat ramp***<br><br>**Mitigations should include:**<br>- Providing adequate number of parking spaces, minimum of 30 pull through double trailer spaces per ramp and adequate single spaces for guests<br>- Adequate maneuvering space to reduce risk of damage<br>- Reconfiguration or movement of boat ramp to eliminate blind spots and other hazards related to SUP/Kayak launch area<br>- Redo traffic analysis and assess mitigations to ensure traffic is not a deterrent to use of boat ramp |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Trailer Boat Ramp - alternate locations | - Letter to King Harbor Yacht Club members demonstrates domino effect of alternate locations is not adequately addressed in DEIR. For example, movement of KHYC building to Mole B to accommodate boat ramp on Mole A would impact parking and or Moonstone Park and Lanikila Outrigger Canoe uses of Mole B. These impacts are not assessed in the DEIR and affect areas beyond to stated scope of the project area defined and evaluated in the DEIR. | - ***Insufficient data in the DEIR for the public to fully understand and evaluate impacts of alternate locations of boat ramp***<br>- Select final location and configuration of boat ramp and redo DEIR to access specific and comprehensive impacts |
| Basin 3, Redondo Beach Marina slips | - Potential halving of slip space reduces coastal dependent recreation and commercial use of harbor and navigable waters<br>- Limited hours of operation of proposed drawbridge substantially impact both recreational and commercial uses of Basin 3 also increases risk of life of property and life in emergency<br>- Parking configuration substantial deterrent to commercial and recreational uses of slips. Crossing active roads and negotiating parking structures while transporting boating gear introduces hazards and deterrents.<br>- Inadequate number of parking spaces could prevent access to boats and slips. | - ***Significant impact to coastal dependent recreational and commercial use of Basin 3 slips.***<br>***Project should be redesigned to eliminate impacts to use of Basin 3***<br>- Require full replacement of current slips<br>- Provide 24 hour operation of drawbridge with rapid response<br>- Protect / prioritize parking and convenient access to Basin 3 slips. |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Cumulative impacts | - Cumulative impacts not adequately assessed for known projects in work<br><br>Known projects include:<br>- Reuse of AES power plant site or building of new AES power plant<br>- Completion of Shade Hotel - increased traffic and unique impact of valet parking from Shade Hotel to parking lot off Portofino Way<br>- New tenants filling in Green Street development that has been largely vacant during traffic counts for project<br>- New Sketchers Headquarters project in Hermosa Beach on PCH<br>- New General Plan for Hermosa Beach that substantially increases commercial uses (over 600,000 sq ft) near project area | - ***Comprehensive, integrated plan and EIR should be developed for entire waterfront not just sq. with current project. DEIR inadequately addresses significant cumulative impacts of known projects***<br><br>***As a minimum the DEIR should be reaccomplished to address realistic cumulative impacts:***<br><br>- DEIR should use Measure B zoning of AES site to evaluate impacts from that site<br>- DEIR should assess some bounding level of reuse of the SCE right of way that would become available for development once power generation ceases on AES site |
| Land use violations | - Total development exceeds development cap set by zoning and LCP.<br>- View protections required by zoning are ignored. Violates zoning, LCP and Coastal Act<br>- Expansion of Seaside Lagoon required by HOC EIR ignored<br>- Paving over public park for new private commercial development road violates zoning, LCP and Coastal Act<br>- Substantial impacts to coastal recreational and commercial use of the harbor violates zoning, LCP and Coastal Act<br>- Project violates city parking requirements and artificially constrains access to coastal resources violating zoning, LCP and Coastal Act.<br>- Project clearly prioritizes private commercial development at the expense of coastal dependent commercial and recreational uses. | - ***Project should be redefined to eliminate violations of zoning, LCP and Coastal Act.***<br>- ***A DEIR should be reaccomplished on a compliant project.*** |

| Item | Issue/Concern | Conclusion |
|---|---|---|
| Biological Impacts | - Redondo has not met LCP requirements to protect nesting birds such as Herons | - ***The DEIR should mandate the method of study, assessment and reporting of trees impacted through the life of the project and define protections inline with the LCP requirements.*** |

## 1.5. Summary Recreational Impact Comparison

The following table summarizes a comparison of the recreational impact of the proposed project against today's situation. This is a subjective analysis based on the assessment included and detailed in this document.

The following grades are used for each assessment:
- slightly worse
- - moderately worse
- -- significantly worse
+ slighter better
+ + moderately better
+ ++ significantly better

| Recreational Element | | Current | Proposed Project |
|---|---|---|---|
| Visual | Views from Harbor Dr | +++ | --- |
| | Views from the Promenade | - | + |
| | Views from Czuleger Park | +++ | --- |
| Aesthetics | Massing | +++ | --- |
| | Aesthetics | -- | ++ |
| Walking | Harbor Perimeter | + | ++ |
| | Bridge | --- | +++ |
| | Harbor Drive | ++ | --- |
| Bicycling | Biking Torrance Blvd | ++ | --- |

| Recreational Element | | Current | Proposed Project |
|---|---|---|---|
| | Biking International Bdwlk | +++ | -- |
| | Biking through pier area | - | -- |
| Seaside Lagoon Park | Capacity of Seaside Lagoon Pool | +++ | --- |
| | Kids water play features | +++ | --- |
| | Swim water quality | +++ | untested but will be worse-- |
| | Kids' swim safety | +++ | --- |
| | Usable park land area | +++ | -- varies with tide |
| | Lagoon parking accessibility and availability | +++ | --- parking space requirement not included |
| | Sea Lion Impact on Lagoon use | +++ | --- |
| | Lagoon Year Round Use | -- | + |
| Hand launch boat dock | Hand launch availability | +++ | + |
| | Hand launch drop off | +++ | --- |
| | Hand launch parking | +++ | --- parking space requirement not included |
| | Sea lion impact on launch or return | - | --- |
| Boating | Recreation boater - slip number | + | If halved --- If not + |

| Recreational Element | | Current | Proposed Project |
|---|---|---|---|
| | Recreation boater - slip use 24 x7 | +++ | -- drawbridge limited operation |
| | Commercial boater slop use 24x7 | +++ | --- drawbridge limited operation will drive out commercial boats |
| | Boaters - slip access | + | --- through shopping and restaurants |
| | Boaters - slip parking | ++ | --- |
| | Trailer boaters usability | -- | +++ |
| | Trailer boaters capacity/parking | +++ | --- |
| | Trailer boaters hazardous conflict with paddlers | +++ | --- based on primary location |
| Boat Ramp Mole A alternative | Potential Impact to Mole C | +++ | --- |
| Sport fishing pier | Availability for recreational uses | ++ | --- (no replacement) or +++ (rebuild) |
| | Access to parking | +++ | --- |
| **TOTAL** | | **61 + 13 -** | **14 to 18 + 54 to 60 -** |

While it is unfair to compare the Current Condition positives to the Project Plan negatives since they are not independent, it is fair to compare the the positives to positives or to the positive/negative ratio for each situation. It is clear the proposed project has a significant impact on the existing recreational uses of the harbor in every category.

## 1.1. Project Alternatives

The project alternative assessments are tainted by the impact assessments earlier in the DEIR and are therefore flawed. **The Project Objectives are written in such a way as to prioritize non-coastal dependent uses of the waterfront at the expense of existing coastal dependent uses in the harbor. This in and of itself represents a violation of the Coastal Act and Redondo's Local Coastal Program.**

The DEIR examines alternatives that are outside the defined scope of the DEIR project. For example, the Mole A boat ramp alternatives appear to be the recommended choice for the boat ramp location. Recent evidence shows the city, yacht club and leaseholder are considering moving the existing yacht club facility on Mole A to Mole B, which would impact public parking, Moonstone Park and/or the existing outrigger canoe club. These locations are outside the scope of the DEIR and the impacts of these alternatives are not fully defined or assessed. **This renders the DEIR insufficient for public review.**

The boat ramp alternatives in particular are only assessed at the very surface level and seem to ignore important weighting factors. For example, the alternatives propose no breakwall for any of the alternative locations, yet most of the locations receive heavy surge making use of the boat ramp dangerous and would represent a high likelihood of regular damage to the floating docks at the ramp. These impacts are ignored.

This document proposes two additional alternatives, however because of flaw in the objectives and the opportunity to achieve those objectives now across the whole harbor, AES property, and power line right of way, **the appropriate approach is to define a superior alternative that integrates the uses and objectives over the entire waterfront area.**

The two recommended alternatives both include expansion of Seaside Lagoon, reduction of harbor area commercial development, elimination of the Pacific Road connection, and an alternative location for the boat ramp.

Each of these alternatives is designed to fully comply with the Coastal Act and Redondo's General Plan and Local Coastal Program while balancing the project and increasing both coastal dependent uses and commercial uses.

## 1.2. Conclusion and Summary

***The project violates Redondo Beach zoning, previous EIR requirements, the Local Coastal Plan (LCP) and Coastal Act. The project description is too vague for the public to reasonably evaluate its impact.*** The project is not ready for public assessment until it is compliant with local and state requirements and adequately described for reasonable evaluation. ***The current DEIR should be withdrawn from public review and comment and reaccomplished.***

But more disturbing, while the DEIR is intimidating in its volume and is advertised to be the most thorough accomplished by the city, it misses or avoids key and obvious assessments and evaluation. ***This leads one to believe the DEIR is crafted to intentionally, artificially reduce impacts and deceive the public and other agencies that must assess this project. The fact that city staff approved this for public release implies a complicity in this act.***

# 2. Project Description

## 2.1. Project background

The DEIR goes through an extensive history of the site. It is not our intent to repeat a separate version of that history here. However, there are key facts that are important to the assessment of this EIR.

This project relies on the zoning passed by the residents of Redondo. This zoning was called Measure G. To pass this zoning, the city relied on an EIR written and approved for a previous zoning and specific plan called Heart of the City (HOC). Due to resident referendum movement, the Heart of the City zoning was rescinded but its EIR was not. This HOC EIR included environmental assessments that dramatically contradict what is contained in the Waterfront DEIR. It also contained mandatory mitigations and conditions that are ignored in the Waterfront Project and its DEIR. These differences will be detailed in the Land Use assessment section of this document.

Due to City Charter requirements Measure G zoning was put to a vote of the people. The documents and campaign material are critical to the assessment of the project with respect to its compliance with the Measure G zoning. When the projects takes license with interpretations of the zoning, it is necessary to assess this interpretation in light of the facts and materials that were before the voters. Interpretations must be congruent with the voter intent as evidenced by the materials available at the time.

Later sections will address the Measure G development cap and the loss of 1/3rd of the Seaside Lagoon Park and why any current interpretation of the zoning is incongruent with the information before the voters.

## 2.2. Maturity of the Project Description

This DEIR is not for a zoning change, it is for a specific project. The city intends to approve development entitlements based on this DEIR. While ambiguity and variability are expected with an EIR related to zoning, much more specificity is demanded of the final project DEIR and EIR. Unfortunately, the project as described in the DEIR are widely variable, making it impossible for the public to adequately understand the impacts of this project.

The drawings and information included in the DEIR have many contradictions. Examples include:

- The plan view (Figure 8) and elevation view (Figure 6) of the Market Hall. The plan view portrays a relatively small second floor, while the elevation shows a much wider second floor. Configuration of second floor development is critical to the assessment of view impacts from Czuleger Park. The ambiguity prevents this assessment.

- The number of parking spaces for the boat ramp varies between 20 and 40 spaces.
- Every elevation and plan view is caveated that it is conceptual only.

The public cannot assess the real impacts with this level of ambiguity, which should not exist in a final project DEIR. But this DEIR is even worse.

The DEIR includes 8 defined alternatives, with the 8th alternative being 7 alternate sites for the trailer boat ramp. This 8th alternative could apply to any of the previous alternatives. On top of that, the DEIR allows two other major alternatives not described in the formal alternatives. One is the potential elimination of the Sport Fishing Pier. The second is the elimination of half the slips in Basin 3. Each of these alternatives drive substantive changes in the impacts on one another that cannot be assessed in a vacuum.

For example, it has recently been revealed that the alternative to move the boat ramp location to Mole A could drive the move of King Harbor Yacht Club to Mole C. (See Figure 1) Mole B includes a Coastal Commission mandated public park, an outrigger canoe club, the Harbor Patrol building, and parking for all uses including slips on either side of Mole B. Obviously, the impacts of moving King Harbor Yacht Club to Mole B are not addressed in the DEIR. Nor are the traffic safety and viability of two way boat ramp traffic negotiating the intersection of Yacht Club Way and Harbor Drive, just yards away from the critical Herondo/Harbor Drive intersection and then maneuvering down the multiple tight 90 degree turns of the very narrow Yacht Club Way, analyzed.

All told, the public would have to assess 224 combinations and permutations of alternatives. The DEIR does not do this. The public cannot reasonably be expected to have the means, the data, nor the time to accomplish this assessment.

### 2.2.1. Conclusions on the maturity of the project and DEIR

Since the City intends to award development entitlements based on the final EIR that would result from this DEIR, the public would not have the opportunity or capacity to adequately assess or address the impacts of any resultant final project. **Comments to this Draft EIR cannot be construed as an opportunity for public comment and the city respond to community concerns and inputs on the final project.**

***The project is not adequately defined for a specific project impact analysis. And the DEIR does not and cannot reasonably reflect the impacts the public can expect. The DEIR should be withdrawn and reaccomplished after more final project details are definitized.***

December 11, 2015

King Harbor Yacht Club

Dear Members,

The Marina Interface Committee working on the proposed Boat ramp location wants to provide you with some perspective on the overall Boat ramp issues and the actions under consideration.

The boat ramp location is a complex matter. Previous legislation (Measure G) requires a boat ramp be built in King Harbor so the City can get approvals to proceed with a major waterfront redevelopment project known as Center Cal. Various ramp locations have been analyzed in the past and are being considered today. We believe the City's preferred location, known as alternative 8, appears to be on Mole A. Mole A is the land where KHYC is currently located. Common sense dictates keeping full KHYC facilities and operations on Mole A, along with a public launch ramp is not compatible. The ultimate ramp location decision may not be finalized for some months with the EIR process and Coastal Commission Hearings having a strong influence on the outcome.

Your committee's goal is to help the City find a logical ramp location that is efficient and safe for boaters, while protecting the future of KHYC activities and community contributions. KHYC factors to be considered include future operations efficiency, Club costs current and ongoing, along with major capital expenses, length of future lease period, etc.

Our decision considerations have been accelerated by recent meetings with Marina Cove Limited (MCL). MCL, who is trying to negotiate its own new 66 year lease, states that the City greatly favors a Mole A location for the ramp. MCL would like to accommodate the City's desires and has asked us to agree, as their subtenant under this new 66 year lease, to move most of our activities to Mole B. Mole B is the land where the Harbor Building and Moonstone Park are located. The City's proposal shows the dry boat storage and the Youth Foundation remaining on Mole A along with certain docks, and the hoists which would be moved east. MCL has stated they would build us the shell of a new building. MCL would provide equivalent dockage and we might be able to acquire slips. We would lose approximately 40 parking spaces, but this might be partly offset by acquiring boat slips for our members.

In response to the previous discussions, we submitted a proposed Letter of Intent (LOI) on November 18 to MCL. A few LOI highlights are as follows:

- partly accept the MCL proposal and agree to move to Mole B if the City gets approval for the ramp to be built on Mole A
- If we move to Mole B we need equivalent facilities to our current set up, all located on Mole B.
- We would receive our own set of slips
- If Mole A approval is not received and construction does not start by a given date, then KHYC will receive a new 66 year lease directly with the City for our existing location. This would be upon agreed terms and with our own slips. We would have to build a new facility, or modernize the current clubhouse, in what is known as "consideration" for the 66 year lease.
- These terms are reasonable since we are helping MCL and the City solve major problems.

The next steps require we find out if our LOI proposal is accepted by MCL and the City. The final DEIR public comment review meeting will be held on January 9, 2016. We must provide KHYC comments in that Jan. 9 meeting for public record and possible use in a review by the coastal commission. If we cannot find a satisfactory solution involving Mole B, then we will have to object to the proposed Mole A ramp location.

Please keep in mind any agreements will be subject to a vote of the membership. Should we not come to agreement with the City, we need your help in testifying at the January 9 DEIR public meeting to be held at the Crown Plaza Hotel. We would ask you to fill out a comment form which will be available at the club, and deliver it in person at the meeting. Comment forms can also be emailed to katie.owston@redondo.org prior to January 9, 2016. Should you wish to discuss the form and your proposed comments, you may contact any of the Club officers, directors, or Marina Interface Committee members.

Sincerely,

Your Marina Interface Committee:
Debbie Helling, Bob Duncan, Karl Keldser, John Alden, Marty Burke, Jim Murrell, Steve Rasak, Dick Whilden, Dennis Groat, and Kelly McMartin

*Figure 1: Letter detailing potential move of King Harbor Yacht Club to Mole B.*

# 3. Cumulative Impacts

Cumulative impacts affect nearly every area of environmental assessment. Therefore, this document discusses the DEIR's treatment of cumulative impacts once in this current section.

CEQA requires the assessment of cumulative impacts of known concurrent and impending development projects. While the DEIR includes some generic population and traffic growth trends assessed for broad regional areas, it neglects to assess projects already in development and those foreseeable and in process to some extent.

**The DEIR sites that it has included some projects that represent cumulative impacts, but it never shows how or where those specific project traffic increases are applied.**

## 3.1. Shade Hotel

The Shade Hotel is nearing completion. It was under construction when the traffic assessment for the DEIR was accomplished. The DEIR used the Shade Hotel Initial Environmental Study for traffic assessment, however there has been a change that would have a substantive impact on traffic that was not accounted for in the IES. As the project was being constructed, the developer received approval from the city to alter the parking accommodations. The approved solution requires valets to move guest vehicles between the hotel and a new parking lot off of Portofino Way. This is in close proximity to traffic using the Waterfront's new parking structure and the boat ramp. The solution approximately doubles traffic caused by the hotel and should be specifically assessed in the DEIR trip generation and traffic analyses.

## 3.2. New Hermosa Beach General Plan

Hermosa Beach is in the process of updating its General Plan. Their DEIR is currently in work and scheduled for release in February 2016. The City has broadly released its plan in the Scoping Document for the DEIR and other documents. Figure 2. shows the non-residential use summary from this scoping document.

**Table 2**
**PLAN Hermosa Nonresidential Development Capacity**

| Land Use Designation | Acres | Existing Building Sq Ft (2015) | New Building Sq Ft (2015–2040) | Total Building Sq Ft (2040) |
|---|---|---|---|---|
| Neighborhood Commercial | 3 | 93,900 | 8,800 | 102,700 |
| Community Commercial | 38 | 976,200 | 154,500 | 1,130,700 |
| Recreational Commercial | 7 | 226,300 | 176,500 | 402,800 |
| Gateway Commercial | 24 | 595,200 | 231,700 | 826,900 |
| Service Commercial | 5 | 82,800 | 22,100 | 104,900 |
| Light Industrial | 6 | 132,000 | 36,800 | 168,800 |
| Total | 83 | 2,106,400 | 630,400 | 2,736,800 |

***Figure 2: Hermosa General Plan Update includes substantial increase in commercial development in close proximity to Redondo's waterfront***

Hermosa Beach is a relatively small community (about 1 square mile) directly bordering the harbor area of Redondo Beach. Adding 630,000 sq. ft of commercial development anywhere in Hermosa will have significant traffic impacts on PCH, Harbor Drive/ Hermosa Avenue, and Herondo/190th Street, all main arterials feeding the harbor area.

### 3.3. AES Property

The AES property is immediately adjacent to Harbor Drive just north of the Waterfront Project. Any change in land use would result in increased traffic and potentially other impacts in the harbor area. AES has entered into an agreement with the city that would allow AES time to find a developer for its property in exchange for halting progress on its application to build a new power plant. This is AES' second attempt to sell its property for uses other than power generation. The first effort resulted in a ballot Measure, Measure B, which defined a mix of commercial and residential uses for its property. This ballot measure was narrowly defeated and could be used as the upper limit of impact assessment of repurposing of the AES property.

***The city had modified the DEIR consultant contract to include assessment of the impacts of Measure B, but according to a city response to a Public Records Act request, this assessment was not "retained".*** The city has not responded to a public records request to show any change of contract that might have relieved the contractor from producing this analysis.

But in reality, the repurposing of the AES site creates a domino affect for the land up the SCE transmission Right of Way paralleling Herondo/190th. Repurposing this land would have a direct impact on traffic and other environmental impacts as well.

This situation cries for and residents have demanded a new comprehensive, integrated

plan for the waterfront. When combined with the discussion of moving the boat ramp to other parts of the harbor and its rippling affect on impacts and land uses, the prudent solution would be to pull the current DEIR and evaluate a comprehensive, integrated plan and its impacts for repurposing and revitalizing the entire waterfront and the SCE Right of Way.

***Regardless, the upper level impacts of repurposing the AES site can and should be assessed as cumulative impacts in conjunction with the Waterfront project.***

### 3.4. Other projects

In addition to the major cumulative impacts cited above, there are several sizable projects on the PCH corridor in Redondo and Hermosa Beach that will incrementally impact traffic on this main arterial. The projects include:

- Expansion of the Sketchers Headquarters in Hermosa Beach
- An assisted living facility at the Knob Hill school site

Cumulatively, these projects could have substantive impacts to key intersections on the PCH arterial and should be included in the DEIR traffic assessment.

### 3.5. Cumulative impacts conclusion

***The logical and reasonable conclusion is that the substantial amount of concurrent activity in the project vicinity should drive an integrated waterfront plan to address the entire harbor/pier area, the AES property and the transmission Right of Way.*** For example, view and recreational impacts in the harbor could be mitigated and even enhanced by moving a portion of the parking and intensive harbor area development to the AES property while still achieving the city's goals for the project.

Barring this logical and reasonable track, the DEIR should as a minimum include an assessment of the cumulative impacts of all these foreseeable projects.

## 4. Visual and Aesthetic Resources

### 4.1. Visual Resources

The DEIR understates the substantive view impacts of the proposed development. Observation Points chosen for the Harbor Area from Harbor Drive and Czuleger Park were chosen in such a way as to show the few remaining views from these well used public access areas. This choice of Key Observation Point is deceptive as is the evaluation of "no significant impact".

### 4.1.1. Harbor Drive

Harbor Drive is well used by pedestrians, runners, skaters and bicyclists as the closest street paralleling the coast through this section of the coast. Today from the southern terminus of Harbor Drive to Portofino Way, views of the harbor, boats, ocean, cliffs of Palos Verdes, and, when conditions permit, even Catalina Island are visible 100% of the way. Figure 3 shows a typical view from Harbor Drive.

***Figure 3: Typical view of harbor breakwater, ocean, cliffs of Palos Verdes, and a faint Catalina Island from Harbor Drive.***

The biggest impediment to the view is Capt Kidd's, which is the only building built right against Harbor Drive in this section of the Harbor. But even here, oblique views will show masts of boats in the harbor, and as one travels to either side of the building, more and more of the harbor and ocean becomes visible. And while the DEIR states the views are poor quality due to the parking lot in between, Figure 3 makes it quite evident the coastal views are quite visible even with cars and SUV's in the parking lots.

This section of Harbor Drive is critical because as you move north current development blocks most views of the ocean and harbor. Cheesecake Factory, the new Shade Hotel, and Blue Water Grill block most of the harbor views. And the very north end, there is no view of the harbor as it is blocked by Spectrum (now BayClub), Tarsans, the boat yard, Marina Apartments, and the SeaLab complex. ***This current development makes the views at the south end of Harbor Drive even more critical.***

**Based on the project plan view included in the DEIR, the proposed development would conservatively block 80% of the current views from Harbor Drive** as shown in Figure 4.

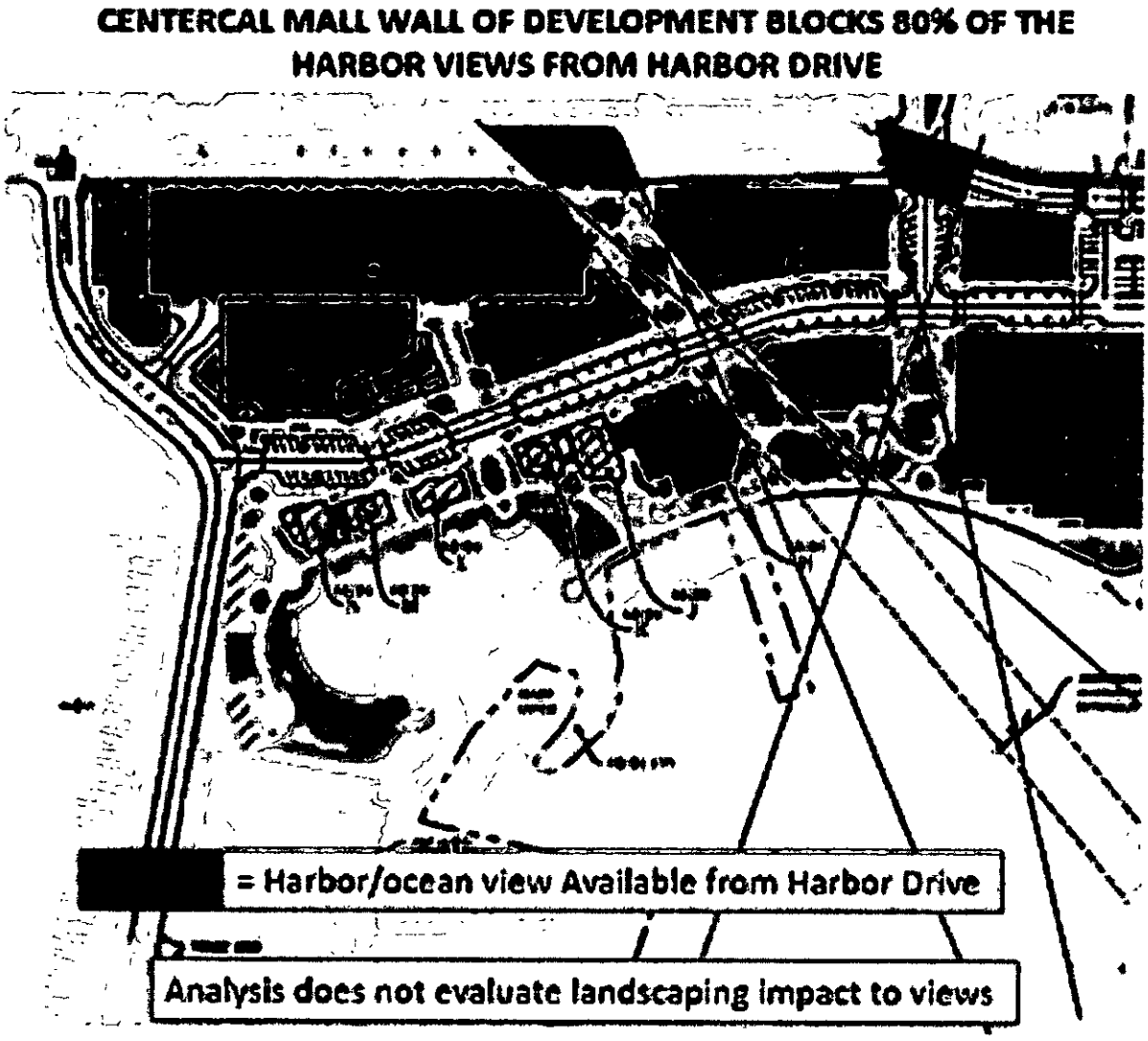



***FIGURE 4: Sight Analysis of CenterCal project shows 80% of views blocked from Harbor Drive. Sight analysis does not evaluate impact of landscaping and other visual impediments.***

The 80% impact is conservative as the site analysis does not take into account landscaping, signage, seating umbrellas, and other visual impediments in the development that will only exacerbate the substantive loss of public views from the last public street paralleling the coast in this area.

Interestingly enough, the only key observation points chosen for the DEIR were chosen to coincide with the center of the only two view slivers through the development. Had the DEIR fairly and reasonably evaluated the view impacts, the view assessments would show an even more dramatic impact. Because the proposed development along

Harbor

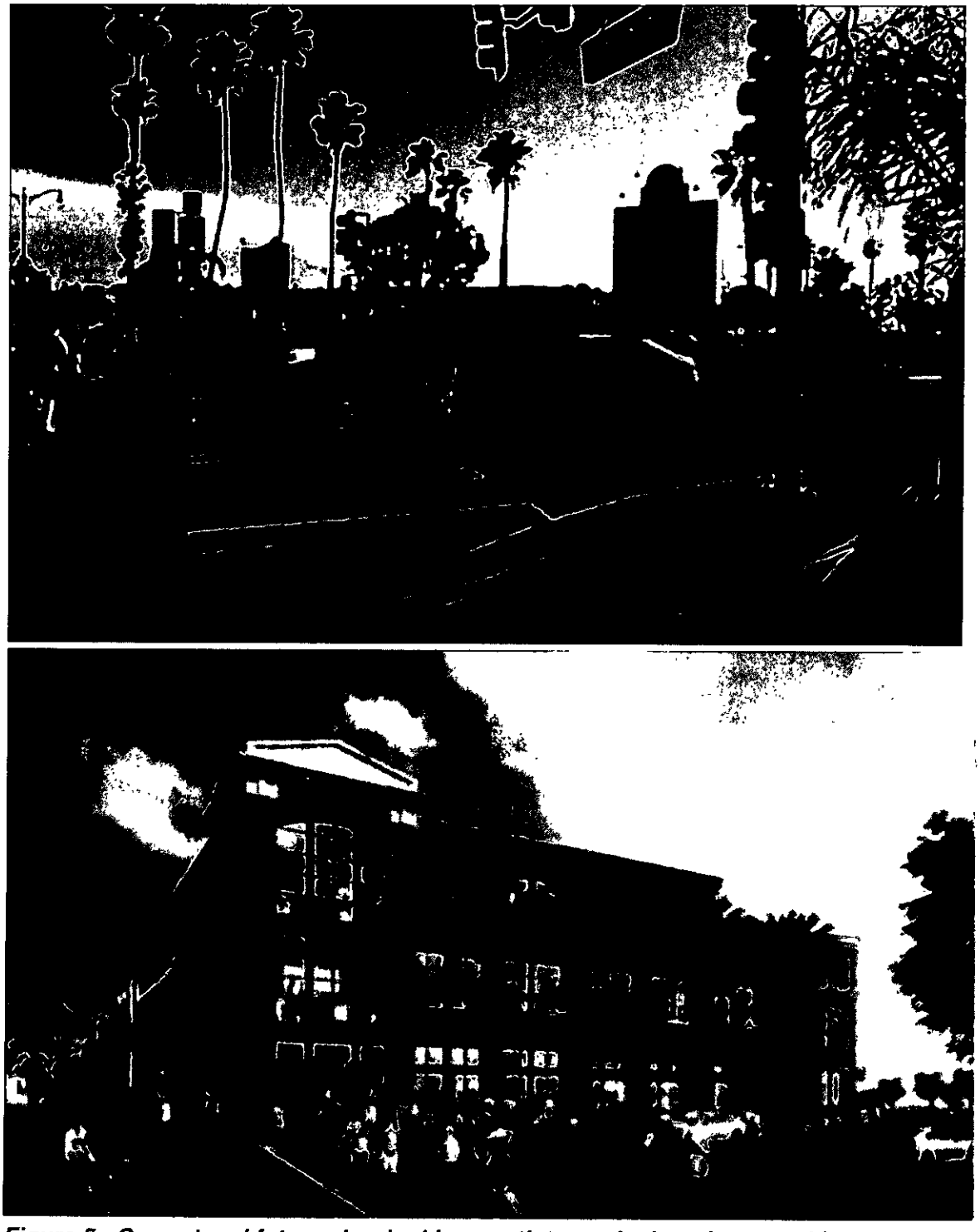


***Figure 5: Current and future view looking south toward edge of new parking structure. Note the image in the DEIR is taken from a higher vantage point to hide the overbearing height of the new structure.***

Drive is built right up against Harbor Drive, including a huge, unbroken, three story parking structure and a two story movie theater; the pedestrians and bicyclists lose much of the view of the sky and would have to look very high to even see the sky. Shadows from these megalithic buildings will cloak most of the sidewalk and bike path by 2 PM.

The DEIR only includes one view of the huge parking garage and retail, office and commercial spaces connected to it and that is from its most complimentary angle. Conveniently, the DEIR neglects to show the current view from this same viewpoint. Figure 5 shows a side-by-side comparison that the DEIR neglected to depict.

Although Figure 5 does not make it obvious, the current view of Dedication Park also includes views of the ocean. The image of the parking structure shown in the DEIR neglects to include new buildings added to the Seaside Lagoon, which would further block this view with structures to the right side (west) of the parking structure. A view from the bike path looking at this megalithic building that covers more than 1.4 acres and is up to 45 feet in height would demonstrate what an overbearing feeling this structure would impose on pedestrians and bikers transiting this area.

Figure 5b demonstrates the magnitude of the impact in a 3D engineering block model of the parking structure and movie theater. And, Figure 5c shows the same view today. Across those parking lot the DEIR does not like is the harbor mouth, the ocean, and the cliffs of Palos Verdes. If visibility were better, the end of Catalina Island would be visible just beyond the end of PV. Certainly this beats the view and experience of being 30 feet away from a 45 foot tall parking structure followed by a two story movie theater hugging the bike track as far as the eye can see.

While the DEIR does not evaluate this significant urbanization of harbor views significant, the HOC EIR does - demonstrating the pro-project bias built into this DEIR.

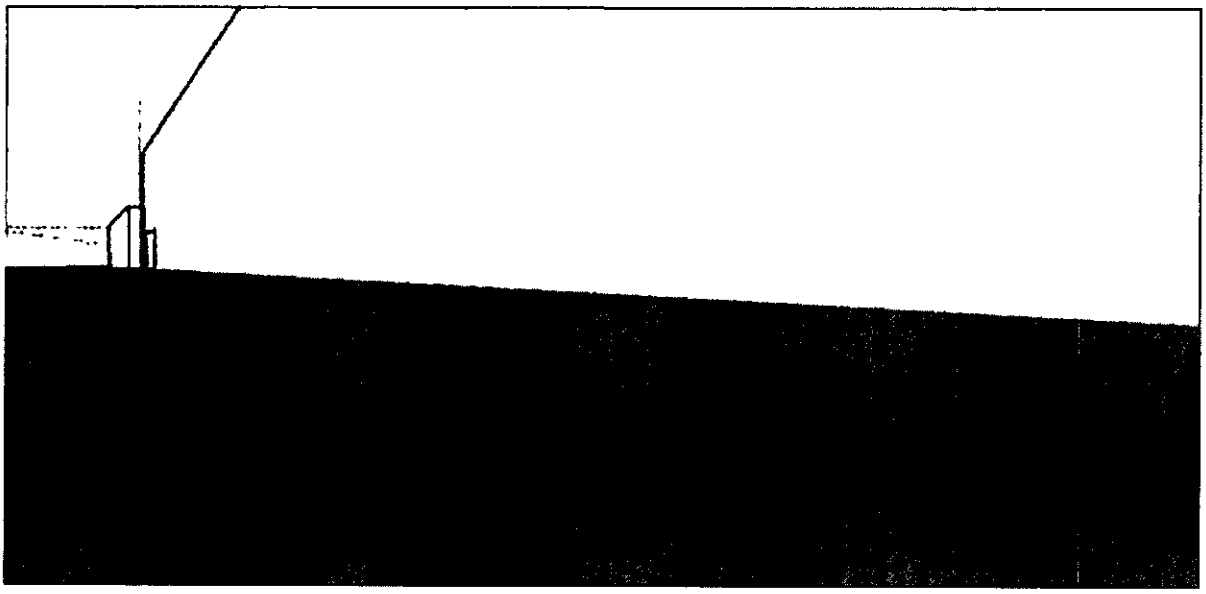


***Figure 5b: 3D engineering block model of proposed parking structure and movie theater demonstrates overwhelming massiveness and shadow a bike rider would experience riding south on the bike path around 3PM. The DEIR somehow concludes this is not a significant view or aesthetic impact.***

***Figure 5c: Same view down bike path today. Harbor mouth, ocean, cliffs of PV are all in view. Certainly much better view than a 45 foot parking structure followed by a two story movie theater 30 feet away and as far as the eye can see.***

### 4.1.2. Views from Czuleger Park

The views from Czuleger Park were specifically protected by the Coastal Commission. This requirement is now contained in the Local Coastal Program:

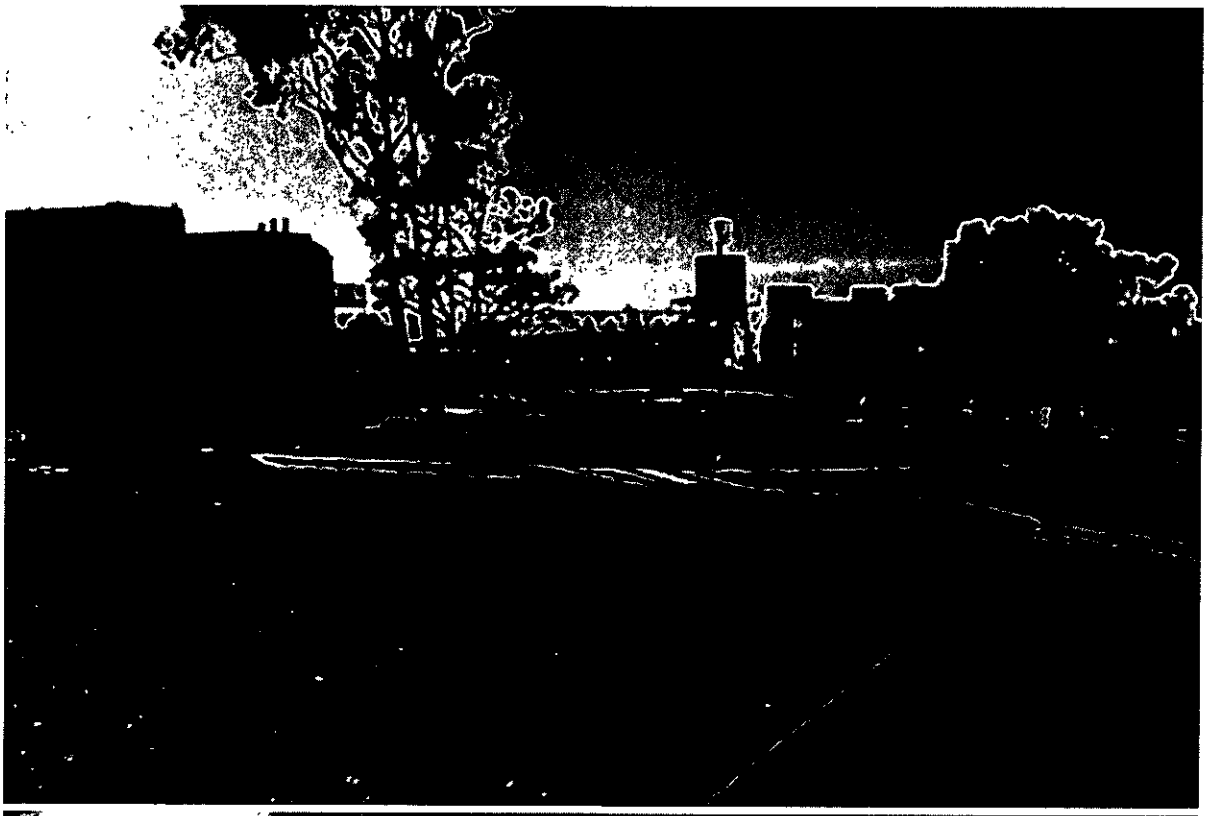
> *"Views from Czuleger Park shall be protected by ensuring that two story buildings are not clustered or lined up in a manner that creates a wall-like impact on views from the park."*[1]

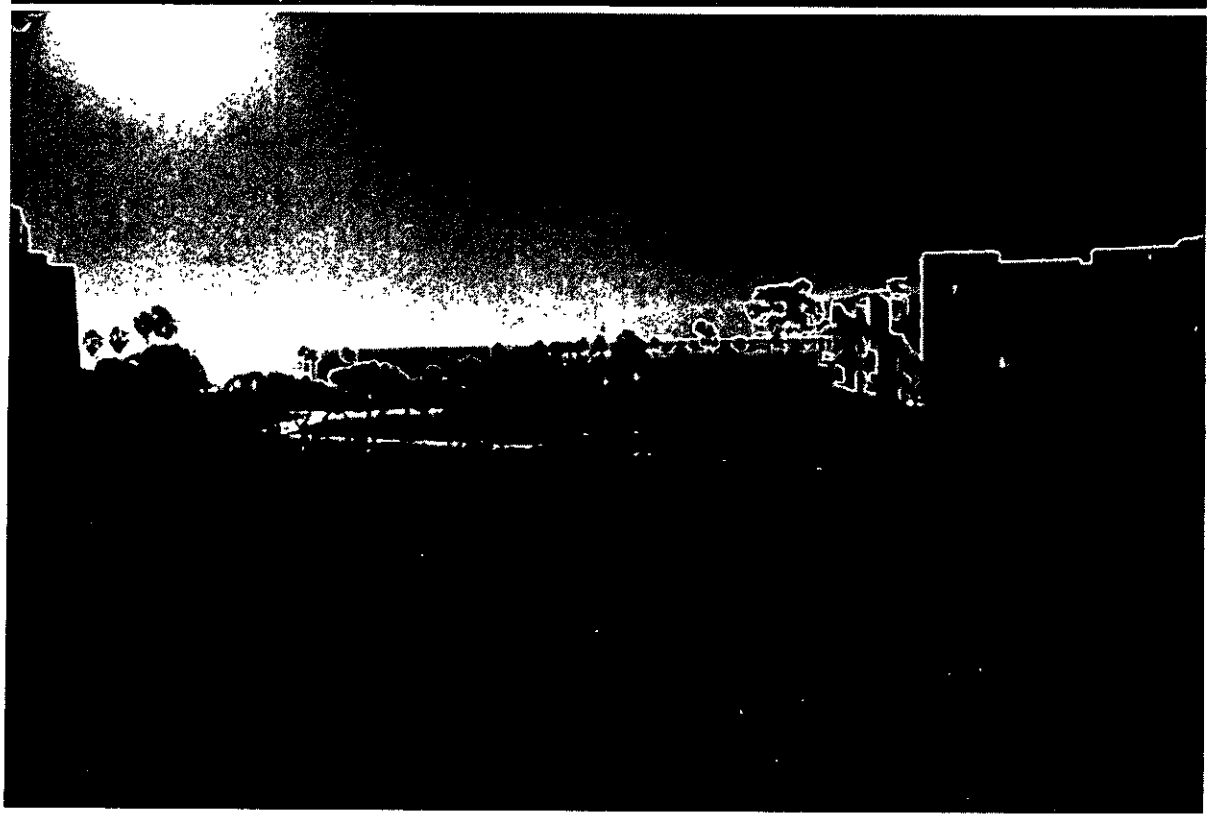
In the same way the DEIR selected artificially favorable key observation points for the views from Harbor Drive, it does the same for the views evaluated from Czuleger Park.

The observation point chosen for Czuleger is at the extreme northern portion high up in the park. And two of the views selected from this key observation point purposefully look at existing condominium buildings. The only selected view of the ocean was chosen to conveniently look south beyond the majority of the harbor.

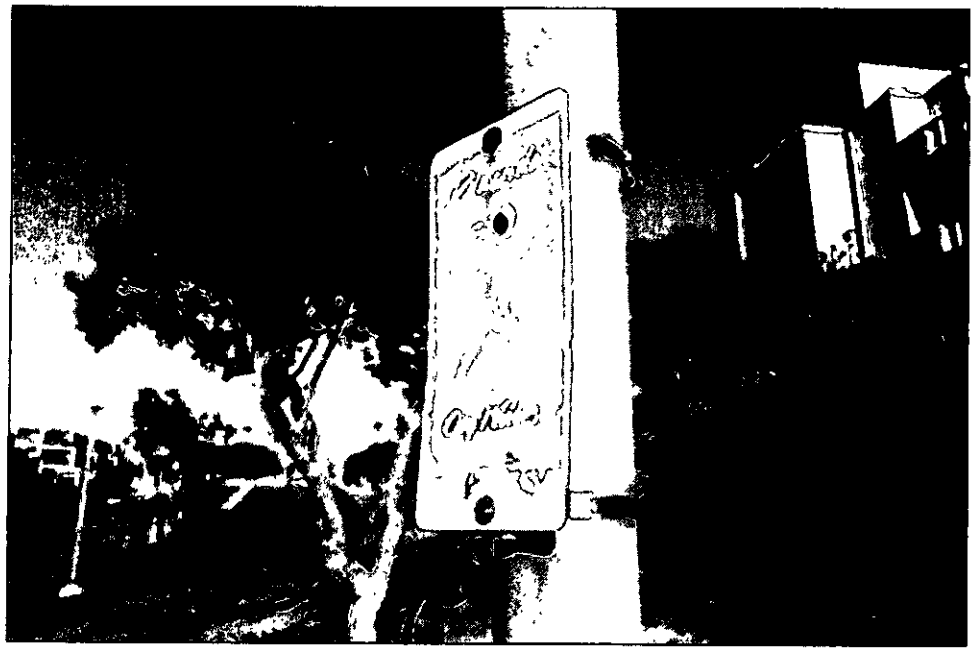
This choice is deceptive as it avoids the most impactful views from better used areas of the park. The following images show the view as one proceeds down the walkway through Czuleger Park, from one of the central park benches, and from the bottom of park overlooking the harbor. Each has significant view of the harbor area that is not reflected in the DEIR visual impact assessment.

[1] Redondo Beach Local Coastal Program 10-5.814 b. 1.





The next image shows that the City has named this path a "Redondo City Walk" . As such substantive view impacts would be significant.



And here is an image from the bottom of the park, overlooking the harbor.

It is important to note that this southern tip of the Harbor (the current boat hoist structures provide an easy point of reference in the preceding images) will be almost entirely filled with a two story market hall. Thus, any views that currently show the south end of the harbor, would be dominated by the proposed market hall. Figure 6 shows the DEIR depiction of the two story market hall dominating the southern tip of the harbor.

***Figure 6: Two story market hall dominates the southern tip of the harbor as shown in a waterside view from the DEIR.***

Figure 7 shows the openness of the south end of the harbor today. It is dominated by the parking for the boaters using Redondo Beach Marina and the restaurants in this part of the harbor.

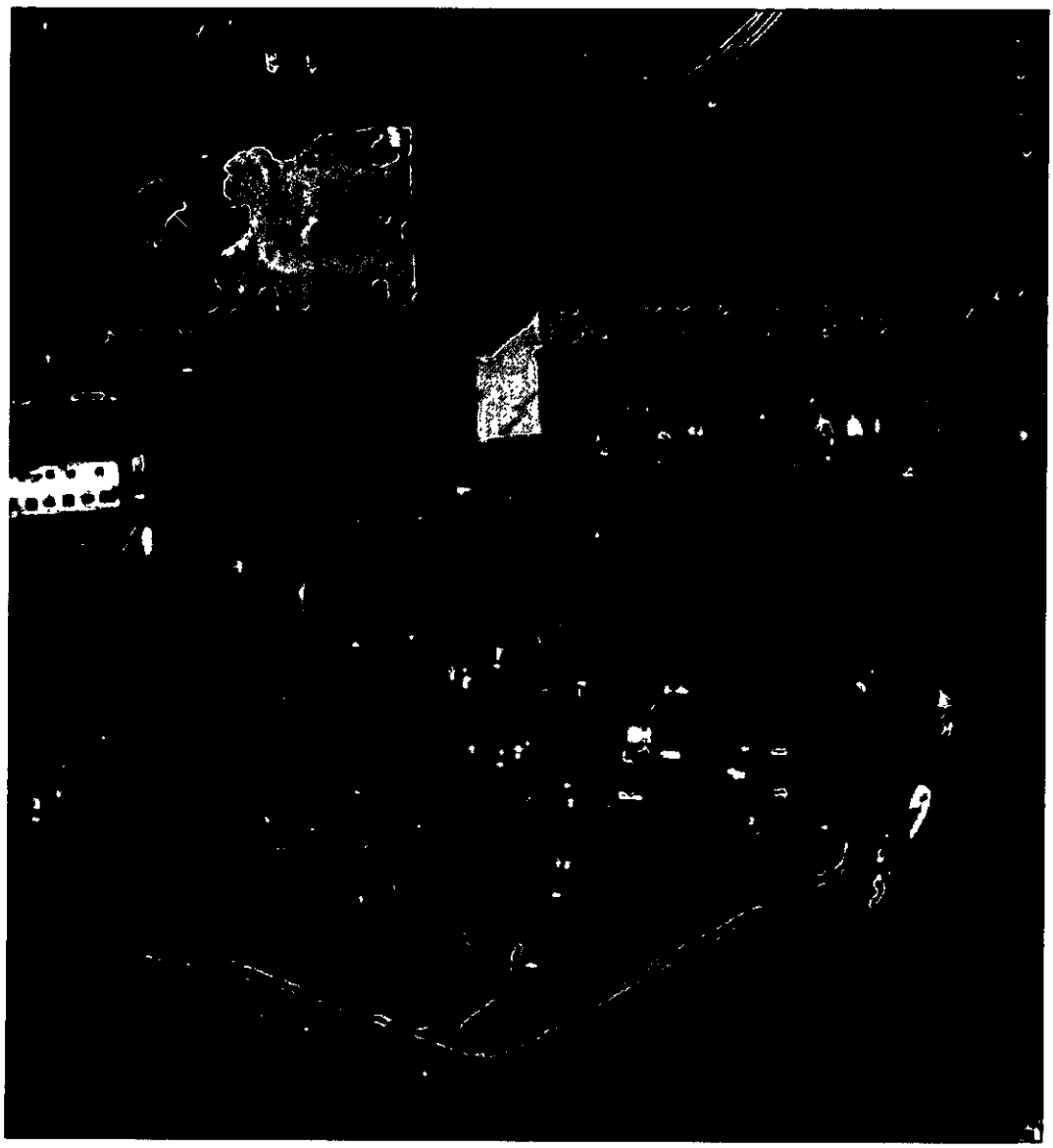


***Figure 7: Current southern tip of the harbor is relatively undeveloped, allowing open views from Czuleger Park.***

Figure 8 shows the dramatic increase in development on this part of the harbor represented by the megalithic Market Hall as depicted in the DEIR. The scale of the market hall becomes obvious from a plan view:

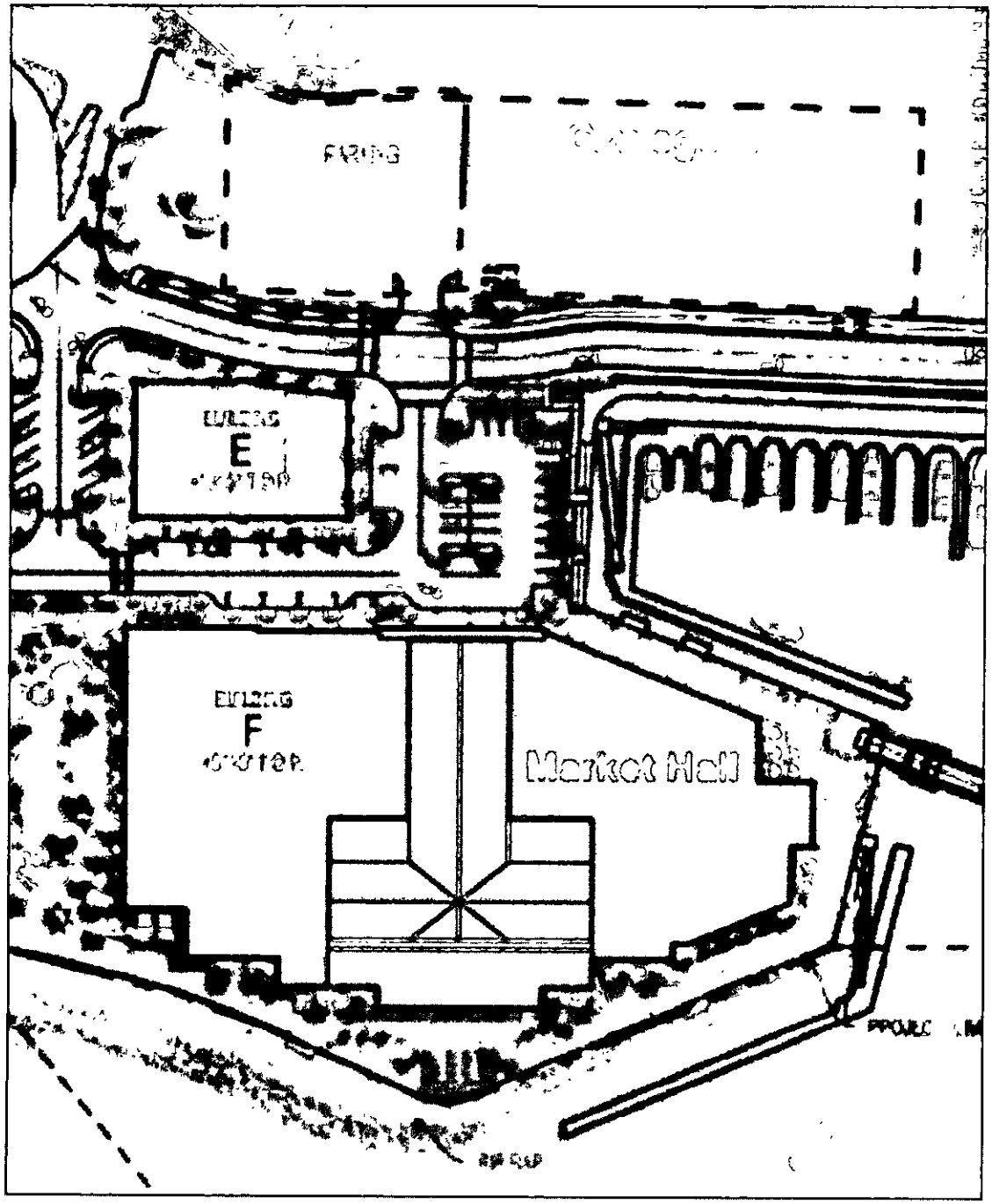



***Figure 8: The proposed Market Hall fills the entire southern tip of the harbor and will dominate most views from Czuleger Park. (from The Waterfront DEIR)***

While the Waterfront DEIR did not do the view impact assessment justice, the Measure G Final EIR (HOC EIR) for the zoning change for this area gives us a much better idea of what a two story market hall in this part of the harbor would do to views from Czuleger Park. Figure 9 is from this earlier EIR and shows the before and after effect

for a two story market hall. It seems the DEIR observation points were purposefully chosen to mask the substantive view impacts showing again its bias toward the development.

***Figure 9: Previous city Final EIR shows the real impact of two story development in south end of the harbor on views from Czuleger Park. This view shows much more ocean and harbor view impact than the convenient view chosen for the Waterfront DEIR. Lower in the park, the impact would be worse.***

A more objective and balanced assessment of the views from Czuleger park would have included more observation points from more utilized areas at various elevations. And as shown by the previous EIR, views from these observations points would be substantively affected by the huge, two story market hall on the southern tip of the harbor. The vagueness of the DEIR combined with its very selective observation points, makes it almost impossible for residents to evaluate compliance with height limitations and view impacts in the southern part of the harbor.

### 4.1.3. Views from the Bike Path through the Parking Structure

Today, the coastal bike path is routed through the seaward edge of parking structure. As such, even though the bicyclist is inside the parking structure, he or she still enjoys views of the ocean and pier as shown in Figure 10.

***Figure 10: View from the bike path through the parking structure.***

The DEIR makes much ado about the improvement of the bike path on the east side of the parking structure. This plan actually creates some safety concerns covered in later sections, but it also totally hides any coastal views until the bicyclist exits the hotel development area as shown in Figure 11. Even when the bicyclist exits the hotel area, he or she must look across two lanes of active car traffic. The dominant view features will be the massive two story market hall and the three stories of hotel and shops at the north end of the pier area . And as noted before the development blocks 80% of the

views from Harbor Drive. The plan as proposed turns the ride from a coastal bike ride to an urban bike ride.

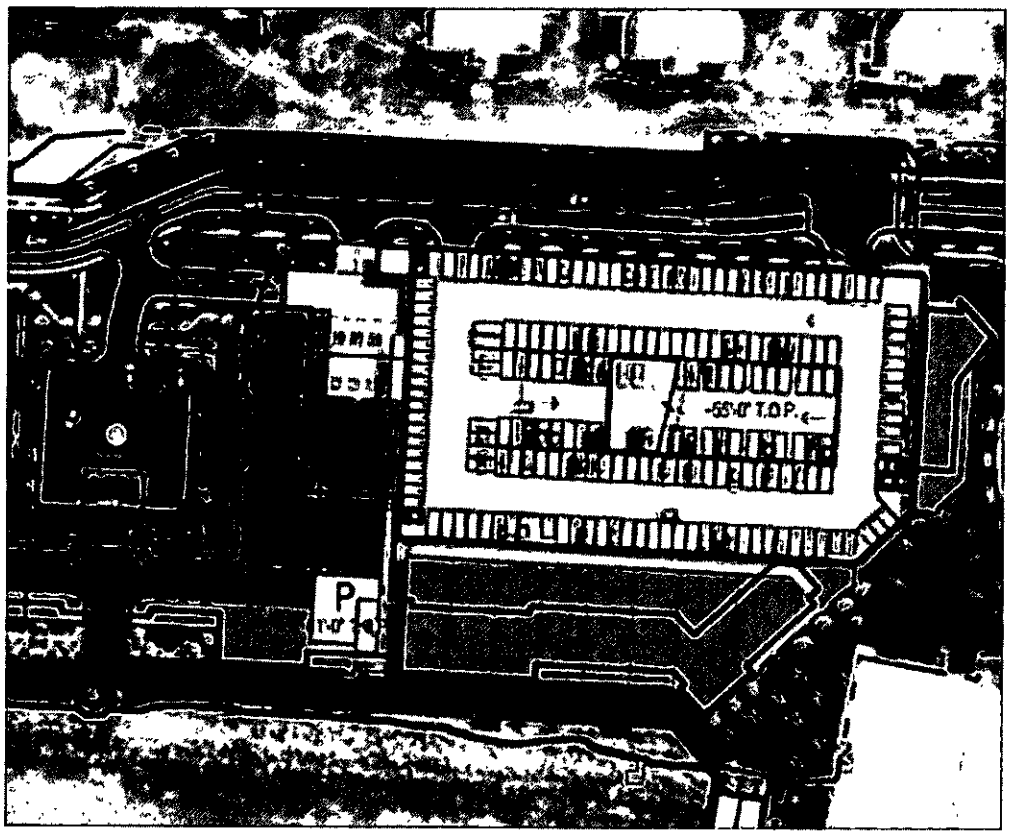



***Figure 11: Development plan routes coastal bike route (red line) behind hotel development in the pier area. This combined with 80% view loss along Harbor Drive is a significant impact. (from The Waterfront DEIR)***

### 4.1.4. Views from within the development

Pedestrian views from within the development will be very similar to those today. There is already a pedestrian path along the water's edge throughout the entire harbor and pier area. In fact, this path in the harbor is well used by pedestrians and joggers year round. One unique harbor view that may disappear, is the view from the sport fishing pier. The pier is optional based on the DEIR. The DEIR does not assess the lost view from this unique perspective in the harbor. Figure 12 shows the view from the end of the current sport fishing pier. The view offered by the project's proposed pedestrian drawbridge would be unique. But this pedestrian bridge creates significant impacts to boats in Basin 3 as discussed later.

The aesthetics of the interior pedestrian harbor/ocean views would improve somewhat with the project. Today the splash wall impedes views for children, the promenade in many areas is just asphalt, and the pier's handrails need replacement. Most of the

issues can be improved without the massive overdevelopment and its impacts on existing coastal dependent recreational uses of the waterfront.

***Figure 12: View of the harbor entrance, cliffs of PV, and Catalina from the end of the sport fishing pier, which could be removed without replacement according to the DEIR.***

The DEIR also discusses the view for bicyclists from this promenade along the harbor's edge, but it is doubtful that bicyclists will be allowed to actually ride on this promenade for safety reasons. This is covered in more detail later in this document, but today bicyclists must dismount when crossing the pier entrance. Similarly, bicyclists must dismount during busy pedestrian periods on the Hermosa Strand near their pier. It is unreasonable to assume bicycling would be allowed on the promenade given the current safety concerns.

### 4.1.5. View impact assessment inconsistent with previous city findings

When the city passed the current zoning that would allow the development proposed in this DEIR, it utilized a Final EIR for a zoning called Heart of the City. The Heart of the City (HOC) zoning would have allowed less development than currently proposed in the southern area in this DEIR. Yet the HOC Final EIR (HOC EIR) concluded the view

impacts from Harbor Drive and Czuleger Park would have been Significant and Unavoidable as shown in Figure 13. In fact, when Measure G zoning was brought to the Coastal Commission for approval, the Commission strengthened the protection of views from Czuleger Park. Despite this requirement from the Coastal Commission, the DEIR avoids reasonable and objective assessment of the view impacts from Czuleger Park by choosing a convenient northern observation point in the park that can barely see the harbor. Now, add the lack of objective assessment of the real view impacts from Harbor Drive and it brings the DEIR assessment even more in question. ***The loss of 80% of the harbor and ocean views from Harbor Drive combined with the view impacts of the market hall from Czuleger Park should objectively and reasonably be evaluated a significant impact.***

| | | | |
|---|---|---|---|
| Visual Resources (Section III.A) | Due to increased waterfront development, the proposed project will block views, particularly from the Seascape Condominiums. Views from Hermosa Street and Pacific Coast Highway would change due to AES site reconfiguration, but would not necessarily be adversely impacted. Increased development density would increase light and glare. Specific Plan design standards address potential light and glare impacts and specify visual characteristics of new development within the project area. | VIS-1 The City shall revise the Specific Plan to limit the development of two-story structures in the southern portion of the Village Core South in exchange for increased height in other portions of the Village Core that have less impact on views. Views from Czuleger Park shall be protected by ensuring that two-story buildings are not clustered or lined up in a manner that creates a wall-like impact on views from the park. | Significant and unavoidable |

***Figure 13: Previous HOC EIR shows impacts significant despite mitigations. Also the Market Hall as depicted in the DEIR violates the proposed mitigation by creating a wall-like impact on views from Czuleger Park.***

## 4.2. Aesthetic Resources

The DEIR complains that the surface level parking degrades the aesthetics of the views from Harbor Drive. Yet the vast majority marinas and harbors across the United States require surface level parking so that boaters have reasonable access to their boat slips and launch points considering the gear they must lug back and forth from their vehicle to the slip or launch point. And, it is this very feature that affords the public the ocean and harbor views from Harbor Drive. Certainly, blocking nearly all views of the harbor and ocean with a megalithic parking structure and movie theater is not an aesthetic improvement, though the DEIR would have us think it is.

Current facilities in the project area are in need of maintenance, but this situation has been created purposefully by the city. All leaseholders have been put on short term leases, and no prudent business person or financial institution will sink money into the aesthetics of a facility with no chance to recoup that investment. Likewise, the city has deferred maintenance and refurbishment of harbor/pier facilities and failed to follow the recommendations of its own consultants in maintaining key structures such as the pier parking structure. So while there is no doubt the aesthetics of the facilities could be improved, the improvement would not require and does not justify hiding the whole area behind massive over development.

One of the elements the CEQA calls out under aesthetics is the assessment of massing.

In the pier area, the pier parking structure turns into a massive three story vertical hotel, retail, restaurant wall lining its seaward side, creating an imposing unbroken wall of development. But the southern harbor area takes the brunt of the development impact. ***The development in this portion of the project goes up a whopping 1000%*** as shown in Figure 14.

| Harbor Section Growth Assessment | Current As Built (sq ft) | CenterCal Mall Project (sq ft) | Increase (sq ft) |
|---|---|---|---|
| Commercial Development | 48,399 | 290,297 | 241,898 |
| Parking Structures | 0 | 261,000 | 261,000 |
| Total Development | 48,399 | 551,297 | 502,898 |

**Figure 14: Development assessment for the harbor area of the project. Over 10x the current development on the ground today!** (Current and proposed square footage data from DEIR project description)

The western face of the pier parking structure becomes a three story solid wall of hotel, retail, restaurant development jutting straight up from and dominating the pedestrian promenade in this area. The new three story parking structure takes up over 1.4 acres of what is today open surface parking for Seaside Lagoon and Dedication Park, the gateway to the harbor. The two story market hall covers nearly the entire southern tip of the harbor, well over 1 acre of ground. And the two story, 700 seat theater completes the virtual wall of development separating Redondo residents from our harbor. All of these are huge megalithic buildings. The aesthetic goes from a quaint harbor to a massive RDE development that one can find many, many other places in the South Bay. It will hard to tell a harbor is still behind this development from Harbor Drive.

| Building | North/South Longest Dimension (ft) | East/West Longest Dimension (ft) |
|---|---|---|
| New parking structure | 660 | 250 |
| Theater | 360 | 125 |
| Market Hall | 430 | 220 |
| Pier Parking Structure and Hotel/ Retail/Restaurant Facade | 820 | 320 |
| Total length of these structures North to South | 2,270 | Total length of site North to South = 2,680 ft (excluding Torrance Blvd Circle) |

***Figure 14B: Four megalithic structure dominate site north to south*** *(estimated from DEIR Figure 2-8)*

Building dimensions estimated from the DEIR project plan view reveal that four megalithic buildings dominate the site from north to south. Figure 14B shows the estimated dimensions of these massive structures. Figure 14C shows DEIR depictions of the three largest. These buildings do not overlap north to south, so their additive length is approximately 2,270 ft. The whole project site north to south from Portofino Way to the north side of the Torrance Circle is about 1,280 ft. That means the development represented by these four megaliths takes up 85% of the project length north to south. The only real views through this wall of development are the fairway leading into Basin 3, the two driveways into the harbor area, and the 70ft diagonal AES right of way. The project creates a massive wall of development between the residents and the harbor.

***Figure 14C: Three of the four new megalithic structures from DEIR elevations.*** *(all images from The Waterfront DEIR)*

While there is no denying that the harbor and pier would benefit from investment, it is unreasonable to conclude that replacing what we have with this proposed massive over development is an aesthetic improvement. And there are plenty of alternatives to this project if aesthetic enhancement is the objective.

Indeed revitalization of the Harbor is already occurring without the over development represented by the Waterfront Project. Here is a partial list of projects completed or in work throughout the harbor area:

- Refurbishment of Redondo Landing

- New Barney's Beanery
- New George Freeth statue
- New A Basq Restaurant
- New Slip Bar and Grill
- New King Harbor Brewery Tasting Room
- New Board House
- New R-10 restaurant
- Refurbished boat hoist
- Refurbished all Seaside Lagoon Facilities
- New extension to the dinghy dock
- New mooring field in the harbor
- New sea lion barge in the harbor
- New Meistrell statue
- New parking lot on Triton Oil dirt site
- Renovation of Portofino Inn, Baleen, and Conference facility
- Renovation of Portofino Marina
- Renovation of Crown Plaza lobby area
- Total renovation of Redondo Hotel
- New Harbor Master facility
- New parking lot expansion for Bay Club (formerly Spectrum)
- Refurbishment of King Harbor Apartment building
- New Tarsans SUP shop
- New award winning bike track and landscaping
- New artwork at new bike track entrance
- Replacement and maintenance of Monstad Pier pilings

Longer leases and strategic reinvestment by the city combined with attraction of key tenants would revitalize the harbor without over development and all the negative impacts on coastal dependent recreational uses of the harbor.

# 5. Land Use Conflicts

## 5.1. Project Exceeds Zoning Cumulative Development Cap

Redondo's zoning and Local Coastal Plan (LCP) places a strict limit on the increase in development across the harbor:

> ***"Cumulative development for Commercial Recreation district sub-areas 1-4 shall not exceed a net increase of 400,000 square feet of floor area based on existing land use on April 22, 2008."***

This cap is repeated for each Commercial Recreation District sub area in Redondo's harbor zoning.

According to the DEIR project description, the total project would increase total development to over 417,000 square feet as shown in Figure 15.

| CenterCal Mall Project Growth Assessment | Current As Built (sq ft) | CenterCal Mall Project (sq ft) | Increase (sq ft) |
|---|---|---|---|
| Commercial Development | 219,881 | 523,929 | 304,048 |
| Parking Structures | 495,000 | 608,340 | 113,340 |
| Total Development | 714,881 | 1,132,269 | 417,388 |

***Figure 15: Net development increase exceeds 400,000 sq. ft zoning cap***

As described in the DEIR the demolished octagonal building, represents 13,945 sq. ft of previous development which must be subtracted from this figure. The net development total would then be 403,443 sq. ft. on its own just exceeding the development cap. But one must include the development increases in other parts of the harbor including the Shade Hotel and the new Harbor Master Facility. According to the DEIR these two developments account for 37,011 ft of the zoning cap, bringing the total to 440,454 sq. ft. However, the DEIR wrongly subtracts the square footage of the old Harbor Master Facility, which has yet to be demolished. Until this is torn down it accounts for an additional 1,728 sq. ft of net new development bringing us to a grand total of **442,182 sq. ft.** ***Therefore the proposed project development exceeds the zoning cumulative development cap by 43,182 sq. ft and violates the zoning cap.***

### 5.1.1. Parking structure zoning cap discussion

DEIR calculations of the zoning cap neglect to address the parking structures. We assume the city would argue that parking areas are not included in floor area calculations. Yet, there is nothing in the Measure G text for the LCP or zoning or in the Measure G ballot supplement that describes or defines "floor area" as excluding parking areas or any other elements of buildings.

Research of city zoning reveals no definition of "floor area". Though it was NOT included in any Measure G text or ballot/campaign materials, the zoning ordinance does define the specific term, "floor area, gross" which is ***exclusively*** used to calculate "floor area ratio" (FAR). The zoning ordinance definition of "floor area, gross" does specifically exclude parking, but the cumulative zoning cap does not use FAR or "floor area, gross" as its delimiter.

> "***Zoning Ordinance 10-5.402 Definitions***
> *For the purposes of this chapter, certain words and terms used in this chapter are construed and defined in subsection (a) of this section. For the purpose of procedures relating to Coastal Development Permits, words and terms are defined in Section 10-5.2204 of this chapter.*

***(a) Definitions...***

*(76)* ***"Floor area, gross".*** *In calculating gross floor area, all horizontal dimensions shall be taken from the exterior faces of walls, including covered enclosed porches, but not including the area of inner courts or shaft enclosures. For purposes of Article 10, use of the phrase "gross floor area" will include shaft enclosures.*

*a. Uses in nonresidential zones. Gross floor area shall mean the floor area of the ground floor and any additional stories, and the floor area of mezzanines, lofts, and basements of a structure.* ***Gross floor area shall not include any area used exclusively for vehicle parking*** *and loading, enclosed vertical shafts, or elevators.*

*(77) "Floor area ratio" or "F.A.R." shall mean the numerical value obtained through dividing the* ***gross floor area*** *of a building or buildings located on a lot by the total area of such lot.*

**Had the city meant for the development cap to exclude parking structures and parking areas, the City should have specified their definition of "Floor Area" or used the specific term "Floor Area, Gross" in the cumulative development cap text before the Coastal Commissioners and the voters. The city did neither.**

Furthermore, the actual language on the ballot states:

> *"Shall the Coastal Land Use Plan and the Zoning Ordinance for the Coastal Zone for the AES Power Plant, the Catalina Avenue corridor and Harbor/Pier areas of the City of Redondo Beach be amended to provide for major changes in existing policies and development standards including: affirming Coastal Commission recommendations,* ***limiting total development****, height limitations,* ***floor-area-ratio limitations****, permitting parks on the AES site and gaining additional local authority to issue coastal development authority?"*

Here the statement clearly says "limiting total development". Excluding parking structures from this assessment would not "limit total development". Additionally note the clear differentiation the city demonstrates by listing both "total development limitations" and "floor-area-limitations". **For the city to conveniently assert that the Measure G cumulative development cap, assessed by the Coastal Commission and voters prior to 2011, now suddenly and magically excludes parking structures represents a dishonest, and misleading bait and switch.**

The City may claim the ballot supplement pamphlet included the current total square footage of current development and that voters should have been able to derive from this total square footage that parking structures were excluded, but this is a spurious argument. The city did not break down their calculation so that the voters could have

seen that parking structures were not included in this total. Even if they did, the public can easily contend this city calculation was simply in error based on the text and definitions in the Measure G text.

There is no campaign literature or public testimony in which the city or Measure G advocates clarified or defined the development cap as being exclusive of parking structures. But nearly all campaign literature, advertising and statements supporting Measure G touted its control of development as shown by sample campaign literature that follow:

| **Measure G – Redondo's Waterfront Revitalization Plan**<br>* California Coastal Commission approved by 11-1 vote July 9, 2009 * | **YES Vote** |
|---|---|
| Inspires Revitalization without Increasing Taxes | ☑ |
| Allows Public Park & Recreational Uses on Power Plant Land * | ☑ |
| Requires Adding New Public Open Space, Waterfront Plazas & Esplanades * | ☑ |
| Prohibits Public Park & Recreational Uses on Power Plant Land | |
| Mandates Preserving & Enhancing Public Views of the Water * | ☑ |
| Protects & Improves Recreational & Boating Facilities * | ☑ |
| Establishes Seventeen New Environmental & Coastal Act Protection Policies * | ☑ |
| Prohibits New Residential Development on Power Plant Land & Harbor-Pier Area * | ☑ |
| Restricts Development in Harbor-Pier Area to less than half the maximum density permitted in Riviera Village and Downtown Manhattan Beach * | ☑ |
| Restricts Building Heights Site Appropriately to 1-3 stories in Harbor-Pier Area * | ☑ |
| Permits High-rise Residential in Harbor Area + Unknown Traffic Impacts | |
| Limits Total New Building Square Footage in Harbor-Pier Area * | ☑ |

**Mike Gin - Mayor of Redondo Beach**

*"Measure G protects our Harbor from over development yet allows for revitalization without raising taxes. It ensures the future economic vitality of our Harbor and supports the recommendations of the California Coastal Commission."*

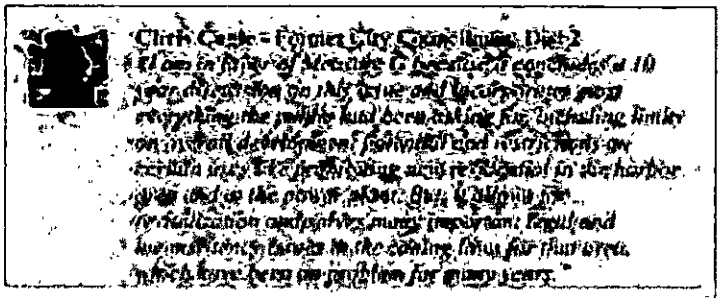


***Figure 16: Campaign literature heavily touts development cap and limitations on overall development, but never states new parking structures would be excluded from that cap.***
The message communicated by proponents of Measure G and elected officials was that Measure G included a firm cap on all building development. There is never any mention or caveat that it would allow an unlimited amount of parking structure development on top of that cap.

When all the facts of what was before the voters when they approved Measure G are combined, the objective and unbiased conclusion is that there was nothing that would have caused the voters to believe parking structures were excluded from the cumulative development cap.

## 5.2. Land Use and Seaside Lagoon Park

### 5.2.1. Heart of the City EIR and Seaside Lagoon

As noted previously, the City relied on the Heart of the City EIR as its EIR for Measure G zoning. The HOC EIR highlighted the recreational value of the Seaside Lagoon Park:

> *"Public workshops conducted as part of the Project effort recognized this area* [Seaside Lagoon] *as one of the most precious and well-used public spaces in the City."* [2]

The HOC EIR called out specific policies designated to address the recreational impacts of the zoning"

> *"Open Space in the Project polices include the designation of formal recreational spaces within the plan area. These polices include...*
>
> - ***Expansion of the Seaside Lagoon "***[3]

The HOC EIR showed the plan to execute this policy was to expand the Seaside Lagoon park into the Joe's Crab Shack leasehold as shown in Figure 17. Also note the

[2] Heart of the City Final EIR, page III-156

[3] HOC Final EIR, page III-168

plan spelled out increasing visibility through the development by creating green open space from Harbor Drive through to the Seaside Lagoon Park.

> *"Other improvements are identified in the Project as projects that could occur as the area is developed. These include* ***realignment of Portofino Way to improve the visibility of the entrance to Seaside Lagoon from Harbor Drive, improvements to Seaside Lagoon access, character, and size****...."*[4]

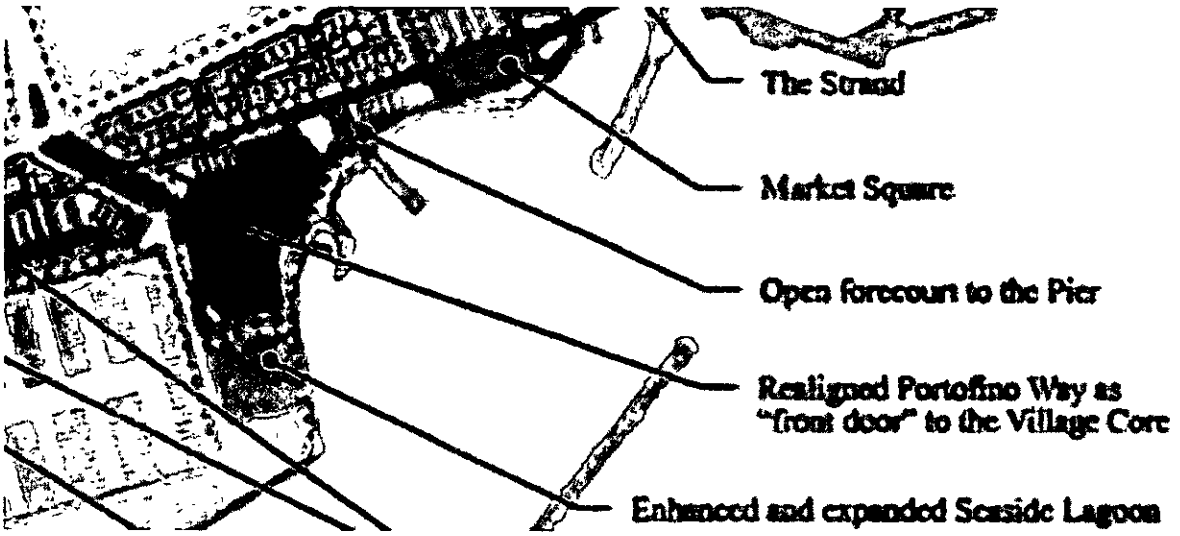



***Figure 17: HOC EIR, used as the Measure G EIR, shows expansion of Seaside Lagoon Park onto Joe's Crab Shack site. Also note visual connection and open space corridor from reconfigured Beryl/Harbor intersection as gateway to the harbor.***

Finally, the HOC EIR specifically called out mandatory mitigation measures to address the impacts if the development on recreation. Those mitigations were in addition to expansion of the Seaside Lagoon park:

> *"5. Mitigation Measures*
>
> ***The following measures are required to address impacts on recreational resources:***
>
> *REC-1 The City shall explore opportunities for development of active public and commercial recreational facilities within the Project area* ***in addition to the expansion of Seaside Lagoon.*** *..."* [5]

---

[4] HOC Final EIR, page III-170

[5] HOC Final EIR, page III-172b

As later sections of this document will show, the proposed project represents significant adverse impacts to coastal dependent recreational uses of the harbor. The zoning EIR recognized this and required expansion of Seaside Lagoon. The proposed project and DEIR ignore this HOC EIR mitigation requirement by shrinking Seaside Lagoon Park rather than expanding it. Thus the project does not comply with mandatory requirements of the HOC EIR.

### 5.2.2. Redondo Land Use Ordinances and Seaside Lagoon

The **Parks and Recreation Element of the City's General Plan** establishes ***3 acres of parkland per 1000 residents as the City's standard***. Even including the County Beach the city has been unable to achieve this standard. In fact, the city is losing ground. Since publication of the current Parks and Recreation element, city has gained residents while decreasing park space. The city has ended the lease of the Knob Hill facility which accounted for .52 acres of parkland.

When the standard was established in 2004 the City was at a ratio of 2.35 acres of parkland per 1000 residents. Based on 2014 estimates of city population and reducing the Knob Hill parkland, ***that ratio has dropped to 2.27 acres per 1000 residents***. According to a study funded by the California State Coastal Conservancy, Redondo Beach had a lower parkland ratio than any other beach city in our vicinity as shown in Figure 18.

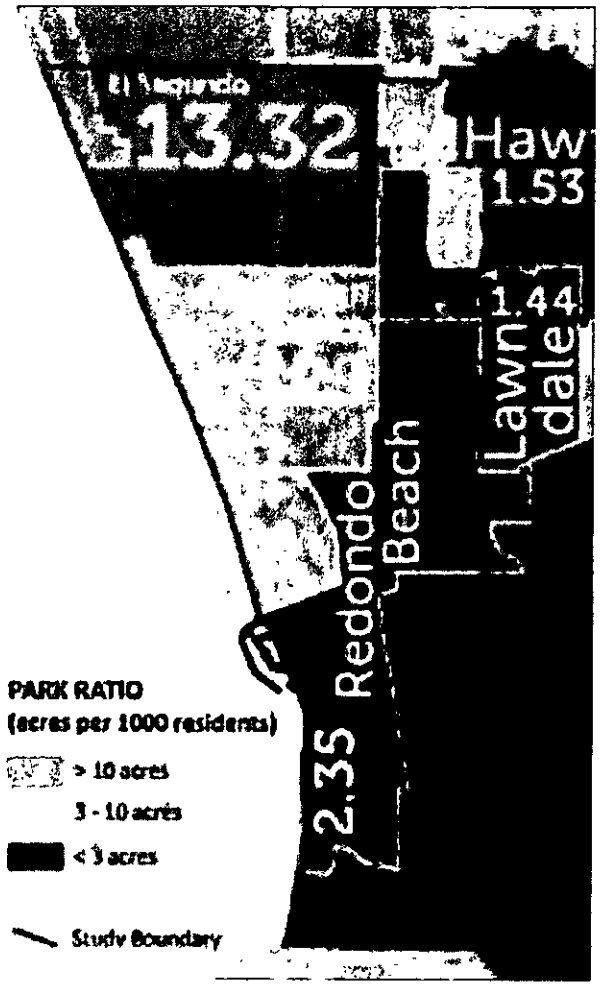



***Figure 18: Parkland ratio of South Bay beach cities. Redondo is considered "underserved" by state standards and has never met its own city standard.***[6]

Legislation passed in 2008 enacted the Statewide Park Program (Public Resources Code §5642) that **defined underserved communities as having a ratio of less than three acres of parkland per 1000 residents.** By this definition, Redondo Beach is "underserved". Paving over what little usable parkland Redondo has exacerbates this situation.

The General Plan, Park and Recreations element supports the state and city standard assessment. This element is filled with evaluations, policies and implementation plans that call for expansion of parkland and in particular the preservation and enhancement of Seaside Lagoon Park. The Parks and Recreation element summarizes public input to

[6] Re envisioning Open Space; Connecting Multifunctional Landscapes throughout the South Bay; prepared for the California State Coastal Conservancy by 606 Graduate Studio, Cal State Polytechnic University, 2011, Figure 3.13

the element:

> *"There is a **deficit of parks and recreational facilities** in the City. **Additional parks and recreation facilities are needed to adequately serve** the current and future populations of Redondo Beach. The City is approaching build-out, and there are few available vacant parcels remaining to develop new parkland or recreational facilities. It will be necessary to supplement the existing inventory with other types of recreational resources."*[7]

The Parks and Rec Element then goes on to establish objectives and policies. The following apply to the Seaside Lagoon.

> *"Objective: It shall be the objective of the City of Redondo Beach to:*
>
> *8.2a **Maintain and enhance existing recreation resources, maximize recreation opportunities, improve accessibility to the coastline, provide view corridors to the beach and marina from the surrounding area**, and restore a sense of place in the Coastal Zone.*
>
> *Policies It shall be the policy of the City of Redondo Beach to:*
>
> *8.2a.4 Consider **expanding**, and providing entrance,* **visibility, *and other improvements to Seaside Lagoon."***[8]

The Local Coastal Plan calls out the general uses and intent of specific parkland in the Coastal Zone:

> *"Parks and open space include Veteran's Park (at the southwest corner of Torrance Boulevard and South Catalina Avenue) and Czuleger Park (within the "Village" west of the intersection of North Catalina Avenue and Carnelian Street), and **Seaside Lagoon** (near the waterfront south of Portofino Way). The primary permitted use is parks, open space, and recreational facilities, and accessory uses such as rest rooms, storage sheds, concession stands, recreational rentals, etc."*

The **Local Coastal Plan implementing ordinance**,10-5.800 generally covers the protection and expansion of coastal recreational uses. As this is covered elsewhere in

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[7] General Plan, Parks and Recreation Element page 3-167

[8] General Plan, Parks and Recreation Element, page 3-176

more detail, it won't be covered in more detail here, other than to summarize that shrinking Seaside Lagoon violates this zoning requirement.

Ordinance 10-5.1110 provides a table of permitted and conditional uses for areas zoned "P-PRO", Public - Parks, Recreation, and Open Space. Concessions are a permitted use and parking is a conditional use. ***The zoning does not allow private roads primarily serving commercial development as either a permitted or conditional use.***

The plan description and documentation provided in the DEIR represent a substantive conflict with the City's General Plan, Local Coastal Plan and Local Implement Ordinance. The plan describes a Seaside Lagoon park in which approximately one third of the park is paved over to provide a private road for the commercial development, parking spaces to be shared with the private commercial development and five additional "concession stands" in addition to the current Seaside Lagoon facilities. The usable public open space has shrank. The pool is filled in and the kids fountains and slides are eliminated. What remains of the useable public open space expands and shrinks with the tide.

Parking currently is shared with Redondo Beach Marina and does not intrude into the park footprint. Currently, food concessions and SUP rentals are provided without encroaching on the limited public park space. The proposed project impacts the public recreational park for amenities primarily serving the commercial development. In other words, ***the project prioritizes private, non-coastal dependent commercial uses over the existing public, recreational, and coastal dependent uses.***

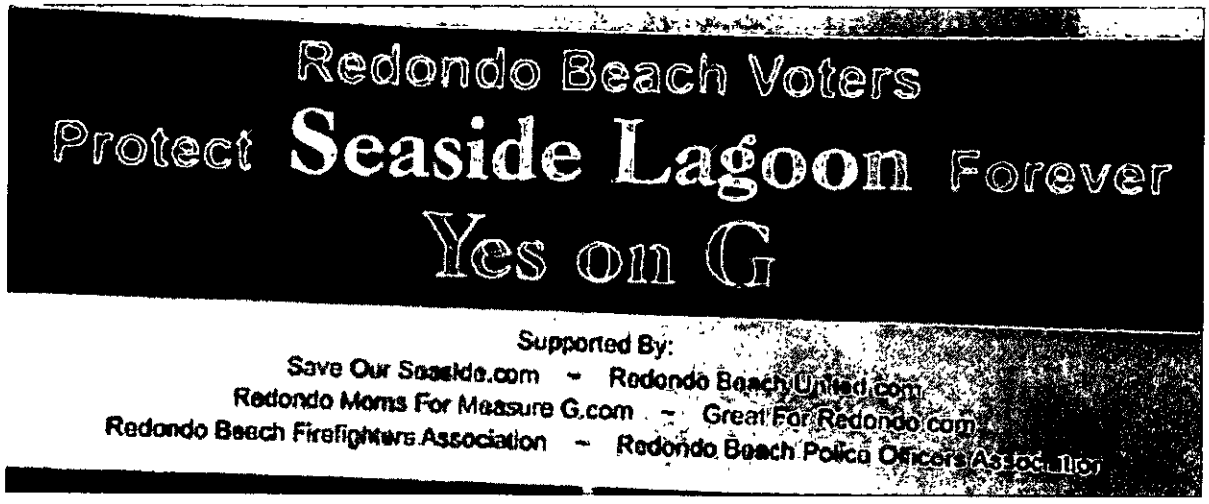
***While city policies and zoning call for expansion and enhancement of parkland in general and specifically Seaside Lagoon, this plan decreases the size and usability to make room for a private road serving the commercial development and a few shared parking spaces.*** Nowhere does the zoning ordinance permit private roads as a permitted use of public parkland. Certainly out of the over 100 lease spaces in the private commercial development, five could be set aside to serve Seaside Lagoon without encroaching on the limited public parkland. ***The negative impacts on the designated public parkland is inconsistent with the stated intent and written policies applicable city policy, zoning, and governance documents.***

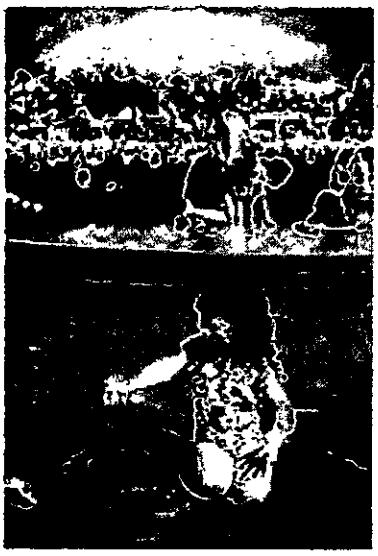
### 5.2.3. Measure G Voter intent on Seaside Lagoon

While Measure G did not actually affect the zoning for Seaside Lagoon, the campaigns for the measure, endorsed by most of the City Council, heavily touted that Measure G was the "only way" to protect Seaside Lagoon "forever".

As shown by the Heart of the City EIR, the General Plan Parks and Recreation Element, public testimony on the assessment of future alternatives for Seaside Lagoon, and other public meetings, Seaside Lagoon is well beloved by the people of Redondo. Using it as a rallying cry in the campaign for Measure G shows that the proponents of the current zoning intended to attract votes by highlighting the preservation of the Seaside Lagoon. The current plan does not meet the campaign promises of the Measure G campaign including current and former elected officials.

The images that follow show how the campaign material promised the preservation of the Seaside Lagoon and protection from private development.

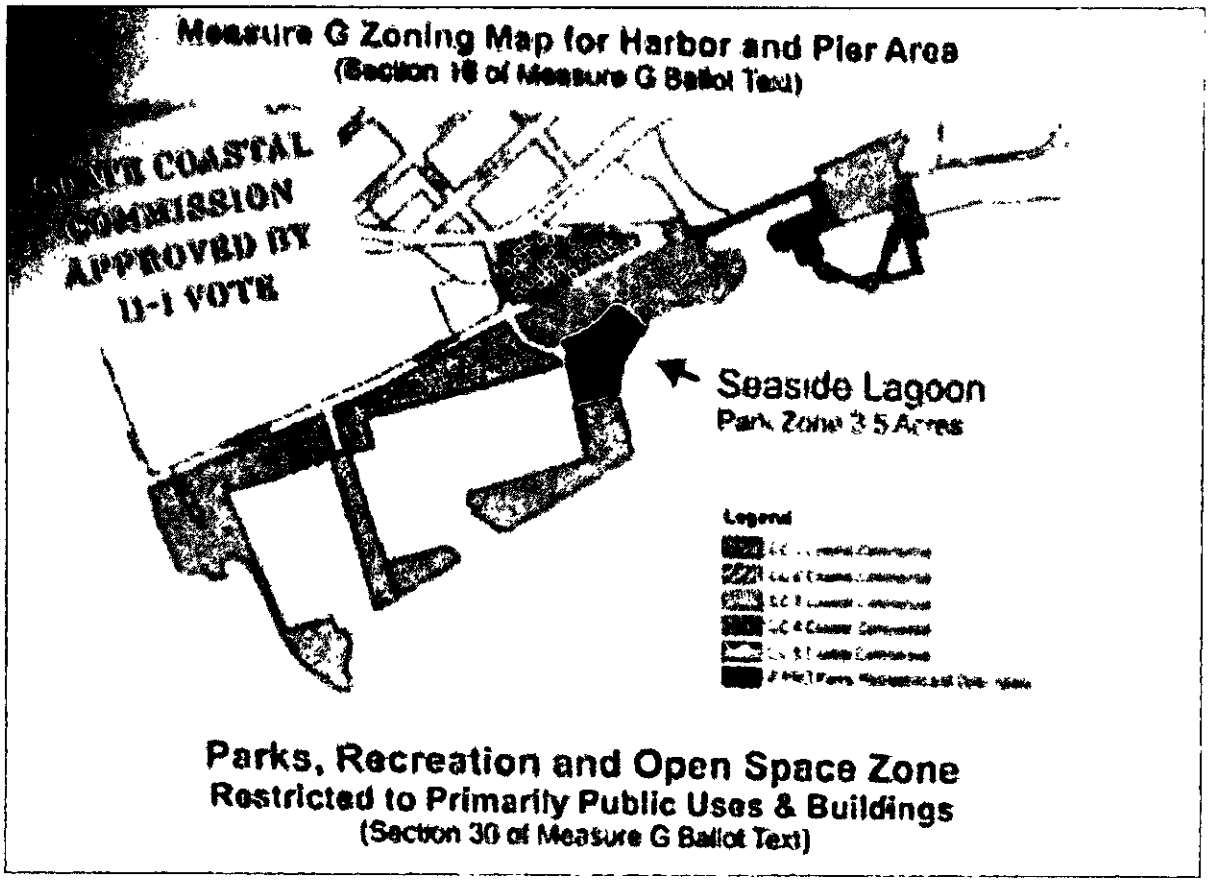




Yes For Protecting Seaside Lagoon From Potential Development

# Measure G Validates Seaside Lagoon Park Zoning

Fact: Yes on G locks in place Public Park Zoning for 3 ½ acres of prime oceanfront land that can never be up-zoned for private development without another vote of the people




But perhaps most telling the ballot argument by Councilmen Aspel, Kilroy, Aust, and Mayor Gin published in ballot materials,

> *" They KNOW that the Seaside Lagoon cannot be converted to any other use without a public vote."*[9]

The project description includes private commercial lease spaces, private parking and a private road supporting commercial development on 1/3rd of Seaside Lagoon while filling in the actual lagoon itself and eliminating the lifeguards, kids fountains, and water slides. The project is inconsistent with Redondo Beach zoning and policy and the advertised intent of Measure G zoning in election materials.

### 5.2.4. Coastal Act and Seaside Lagoon

Since the California Coastal Commission has approved the city's Local Coastal Program, the city is now charged with enforcing not just the LCP, but also compliance with the California Coastal Act.

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[9] "Rebuttal to the Argument Against Measure G" published in election ballot booklet

As a unique, salt water, sand bottom recreational beach/pool feature drawing its water from the ocean/harbor itself and recycling it back into the harbor, the Seaside Lagoon is a coastal dependent recreational use as defined by the Coastal Act:

> *"**Section 30101 Coastal-dependent development or use***
> *Coastal-dependent development or use" means any development or use which requires a site on, or adjacent to, the sea to be able to function at all."*

Indeed, based on its uniqueness, its specific call out in the Redondo Coastal Land Use Program, and its documented popularity (over 81,000 daily users, nearly 600 children enrolled in day camps, and over 70 events in 2015[10]), the Seaside Lagoon qualifies as a "sensitive coastal resource" per the Coastal Act:

> ***Section 30116 Sensitive coastal resource areas***
>
> *"Sensitive coastal resource areas" means those identifiable and geographically bounded land and water areas within the coastal zone of vital interest and sensitivity. "Sensitive coastal resource areas" include the following: ...*
>
> *(b) Areas possessing significant recreational value...."*

The Coastal Act explicitly prioritizes coastal dependent recreation over non-coastal dependent commercial uses.

> ***Section 30001.5 Legislative findings and declarations; goals***
>
> "*The Legislature further finds and declares that the basic goals of the state for the coastal zone are to:*
>
> *(c) Maximize public access to and along the coast and **maximize public recreational opportunities in the coastal zone** consistent with sound resources conservation principles and constitutionally protected rights of private property owners.*
>
> *(d) **Assure priority for coastal-dependent and coastal-related development over other development on the coast**. ..."*

[10] City of Redondo Beach statistics provided in response to a California Records Act Request, Appendix A

The Coastal Act specifically protects public coastal-dependent recreational uses:

> **"Section 30220 Protection of certain water-oriented activities**
>
> *Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses."*

As will be further discussed in the "Recreation" section of this document, the elimination of the salt water pool, kids' fountains, and water slides, the elimination of lifeguards, the reduced size of the usable public open space, and the combined use by SUP'ers and kayakers all represent a significant negative impact to current coastal dependent, water-oriented recreational activities. This is a clear violation of Section 30220.

> **"Section 30221 Oceanfront land; protection for recreational use and development**
>
> *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area."*

Seaside Lagoon and the hand launch boat ramp are both well-used, existing recreational uses and development of the waterfront. And city statistics and commentary by Harbor Patrolmen and boaters in public meetings demonstrate the demand for these resources is growing. Indeed, the DEIR itself states the development will attract more people to the area and cites the growth of stand up paddling. Thus reducing the usable public parkland and capacity of the recreational uses overall represents another clear violation of the Coastal Act, this time Section 30221.

> "**Section 30252 Maintenance and enhancement of public access**
>
> The location and amount of new development should **maintain and enhance public access** to the coast by ...
>
> (4) providing **adequate parking facilities**...."

Today, Seaside Lagoon and the hand launch boat ramp utilize 3 acres of surface level parking shared with the Redondo Beach Marina and its lessees. Parking is in close proximity to the Seaside Lagoon and boat launch and both have convenient drop off access directly adjacent to the use. The project defined in the DEIR is over 200 parking spaces short of Redondo parking standards - yet writes this deficit off as no significant

impact. Later sections of this report will show that ***the parking assessment in the DEIR does not include any allocation for Seaside Lagoon users, users of the hand launch boat ramp, fishermen using the sport fishing pier, or those embarking from the sport fishing pier for whale watching or sport fishing***. So the REAL deficit is much greater than that assessed in the DEIR. Furthermore, the vast majority of that parking would be in a four level parking structure across the new private road and through multiple commercial lease spaces.

The Coastal Commission staff opined on the shared parking when considering a specific development permit in the harbor:

> *"The location and amount of new development should further maintain and enhance public access to the Harbor area by providing adequate parking facilities to serve the needs of new development, and by assuring that no net loss of existing parking facilities to the area will occur as a result of permitted new development.* ***Given the importance of the Seaside Lagoon area as a public recreational facility, adequate nearby parking facilities to serve this area should be preserved.***"[11]

It is apparent that the Seaside Lagoon Park boundaries and recreational uses were a secondary consideration to the DEIR proposed commercial development in the harbor area. The fact that the recreational users of the Seaside Lagoon and surrounding recreations resources demonstrates the low priority placed on coastal dependent recreation in the current project. ***The location of the parking; the difficulty in negotiating a four level parking structure, an active public road and shopping area with gear and equipment; and the insufficient number of parking spaces all deter recreational access and thus reflect a clear violation of Section 30252 of the Coastal Act.***

### 5.2.5. Seaside Lagoon Land Use Compliance Summary

The negative impacts to the Seaside Lagoon public parkland and the repurposing of a significant portion of the public parkland for a private road servicing a private commercial development represent a violation of the Coastal Act, the City's General Plan Parks and Recreation Element, the City's Local Coastal Program and its implementing ordinances. These impacts clearly violate the will of the voters and residents of Redondo as documented in campaign literature and the discussion in the

[11] Coastal Commission Staff Report on Application 5-97-379, 29 Jan 1998, pages 8 and 9

Parks and Recreation Element. The project should be redesigned to preserve and enhance this unique coastal recreational feature.

### 5.3. Other Land Use Conflicts

The project described in the DEIR is dominated by hotel, restaurants, and a movie theater development. The project provides the developer and city the option to eliminate 50% of the boat slips in the project and eliminate the sport fishing pier. It decreases the usable public parkland and eliminates the salt water, sand bottom swimming pool, kids' fountains and waterslides. The pedestrian bridge is given priority over boater access to Basin 3 impacting its use for recreational and commercial boaters by limiting the hours they can leave or enter the slips they lease. Even the enhancement of adding a boat ramp is shortchanged in allocated parking space and in the location primarily assessed in the DEIR, put at odds with paddle boarders and kayakers. And to add insult to injury, the DEIR does not even assess any parking requirements for the users of the Seaside Lagoon, the kayakers and the paddle boarders. And what parking is provided is not conducive to these uses.

Clearly the commercial development and its requirements were given priority over coastal dependent recreational and commercial uses. This is a violation of City and State policies, regulations and ordinances.

Redondo zoning ordinance:

> *"10-5.800 Specific purposes, CC coastal commercial zones.*
>
> *In addition to the general purposes listed in Section 10-5.102, the* ***specific purposes of the CC coastal commercial zone regulations*** *are to:*
>
> > *(a)* ***Provide for the continued evolution and use of the City's coastal-related commercial-recreational facilities and resources*** *for the residents of Redondo Beach and surrounding communities, while ensuring that uses and development are compatible with adjacent residential neighborhoods and commercial areas;*
> >
> > *(b) Provide for the* ***development of coastal-dependent land uses*** *and uses* ***designed to enhance public opportunities for***

***coastal recreation**, including commercial retail and service facilities **supporting recreational boating and fishing**, and to encourage uses which:*

> *(1) Are **primarily oriented toward meeting the service and recreational needs of coastal visitors, boat users, and coastal residents seeking recreation,***
>
> *(2) Are active and pedestrian-oriented while meeting the need for **safe and efficient automobile access and parking,***
>
> *(3) Have a **balanced** diversity of uses **providing for both public and commercial recreational facilities,***
>
> *(4) **Provide regional-serving recreational facilities for all income groups** by including general commercial and recreational use categories,*
>
> *(5) **Provide public access** to nearby coastal areas, and*
>
> *(6) **Protect coastal resources**;*

The project described in the DEIR clearly violates 10-5.800.

Likewise, the project conflicts with the bolded areas of the General Plan Parks and Recreation Element that follow:

> *"Objective: It shall be the objective of the City of Redondo Beach to:*
>
> *8.2a **Maintain and enhance existing recreation resources, maximize recreation opportunities, improve accessibility to the coastline, provide view corridors to the beach and marina from the surrounding area,** and restore a sense of place in the Coastal Zone.*
>
> *Policies It shall be the policy of the City of Redondo Beach to: ...*
>
> *8.2a.2 **Increase recreational boating opportunities for visitors and residents.***

*8.2a.3 Evaluate potential* ***improvements to and facilities for Moonstone Park*** *using input from the boating community, Commissioners, and Harbor Department Staff.*

*8.2a.4 Consider* ***expanding, and providing entrance, visibility, and other improvements to Seaside Lagoon."***[12]

*"8.2b.5* ***Minimize parking conflicts at parks.*** *..."* [13]

Recreational resources are negatively impacted by the proposed project. The new boat ramp is artificially constrained by a decrease in trailer parking spaces from the current amount and from reasonable standards. Access is impacted by the traffic, lack of parking and the deterrent of forcing boaters, kayakers, paddle boarders, and Seaside Lagoon visitors to lug their equipment and supplies through four levels of a parking structure, through shopping areas, and across active streets. The potential reduction of slips decreases boating opportunities as does the limited hours of the pedestrian bridge. And of course the project does not expand or provide visibility of Seaside Lagoon.

The project also ignores the Parks and Recreation Element Implementation Programs:

***"Enhance the entry and visibility of Seaside Lagoon from North Harbor Drive.***

***Expand land area of Seaside Lagoon."*** [14]

The project ignores the policies required by the HOC EIR:

*"Open Space in the Project polices include the designation of formal recreational spaces within the plan area. These polices include...*

- *A 35,000-square-foot paved or waterfront plaza at Mole D that includes* ***one side open to the water*** *and defined on three sides by buildings oriented towards the Plaza space (Market Square)*

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[12] General Plan, Parks and Recreation Element, page 3-176

[13] General Plan, Parks and Recreation Element, page 3-178

[14] General Plan, Recreation and Park Element, 3-181

- ***Expansion of the Seaside Lagoon*** "[15]

The Redondo Beach Land Use Plan, which is part of the Local Coastal Program calls for the preservation and expansion of coastal dependent land uses and to ensure development is harmonious with existing development.

*D. "Land Use Policies*

*The following policies, in conjunction with the land use development standards in Section C above, set forth land use guidelines for development in the City's Coastal Zone.*

*1)* ***Coastal dependent land uses will be encouraged*** *within the Harbor-Pier area. The City will* ***preserve and enhance these existing facilities and encourage further expansion of coastal dependent land uses****, where feasible.*

*2) New development, additions or major rehabilitation projects within the Harbor-Pier area shall be sited and designed to:*

*b)* ***Preserve and enhance public views of the water from*** *the moles, pier decks, publicly accessible open space and* ***Harbor Drive****.*

*c) Be* ***consistent and harmonious with the scale of existing development,....*** *"[16]*

The project described in the DEIR shows no evidence of the city even attempting to comply with these policies. The total development more than doubles what is on the ground today in the combined pier and harbor area, and in the harbor area it represents 10x the current development on the ground. The vast majority of the development is non-coastal dependent shopping, entertainment and restaurants. And the parks and recreational amenities are artificially diminished and constrained by the overabundance of non-coastal dependent development. And it is hard to comprehend how one could call 10x the development in the harbor as consistent and harmonious with existing development.

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[15] HOC Final EIR, page III-168

[16] Redondo Land Use Plan, page 6

This document has previously cited the stated priorities of the Coastal Act, so they are not repeated here. But there are other sections of the Coastal Act that are violated in the project described by the DEIR.

> *"**ARTICLE 3 RECREATION***
> ***Section 30220 Protection of certain water-oriented activities***
>
> ***Coastal areas suited for water-oriented recreational activities** that cannot readily be provided at inland water areas **shall be protected for such uses**."*

Our harbor was created solely for water-oriented recreational activities. The use of the harbor for boating, kayaking, stand-up paddling, fishing and similar water dependent uses are a protected use. The current project described by the DEIR negatively impacts these uses as detailed elsewhere in this document.

> ***"Section 30221 Oceanfront land; protection for recreational use and development***
>
> *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area."*

Our harbor is the only recreational harbor in the 25 miles of coastline between Marina Del Rey and Cabrillo Marina in the Port of LA. The population density of LA county makes this a valuable and extremely limited regional asset. As evidenced by public meetings on the harbor and as documented in the DEIR use of the harbor for Stand Up Paddle boarding is exploding. And while recreational boating had taken a hit in the recession, it is experiencing growth again now the economy is expanding.

The DEIR states that the reduction in slips in Basin 3 would be no impact because there are 50 slips available elsewhere in the harbor today. This position takes convenient advantage of the recent recession's impacts on slip availability and ignores the recovering economy and history of slip availability in King Harbor. Prior to the recession, there was a years long waiting list for slips in all marinas in King Harbor. Vacancies were quickly filled. The foreseeable future demand for slips is growing not declining.

The project eliminates 67 pull-through trailer parking places and only includes 20 at the new boat ramp per the parking evaluation in the DEIR. The Coastal Commission

required a boat ramp to encourage more trailer boating than the boat hoists do. Shrinking the trailer parking to less than the state guidelines for two lanes would artificially constrain the use of the boat ramp. This violates CEQA priorities and requirements by reducing capacity from what exists today.

The project described in the DEIR does not allow total evaluation of the amount of commercial recreational uses included in the project. But commercial land uses overall are eclipsed by the space dedicated to hotel, restaurant and entertainment uses. And the private marina uses are negatively impacted by these other uses and their amenities. The DEIR describes the option to halve the number of slips in the Basin 3 marina. Convenient, prioritized parking for slip leasers is eliminated. And access to the slips is dramatically impacted by the proposed development. Finally, the limited hours and low height of the pedestrian bridge prioritizes non-coastal dependent shopping and restaurant uses over uses of the marina. This clearly violate Section 30222 of the Coastal Act.

> ***Section 30222 Private lands; priority of development purposes***
>
> *The use of private lands suitable for visitor-serving* ***commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority*** *over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

In much of the harbor, the uplands are actually waterfront and includes the Basin 3 marina. Thus any support to the marina is in the uplands. Additionally all parking for the Seaside Lagoon and hand launch boat ramp users is in the uplands. Section 30223 prioritizes the use of uplands areas for coastal recreational uses when necessary. The parking included in the project does not include an assessment for parking for Seaside Lagoon users and users of the small hand launch boat ramp, yet it is already 200 parking spaces short of Redondo requirements. As noted before, access to all recreational users of the harbor is negative impacted. These conditions violate Section 30223, 30224 and 30234 of the Coastal Act:

> ***Section 30223 Upland areas***
>
> *Upland areas* ***necessary to support coastal recreational uses shall be reserved*** *for such uses, where feasible.*

***Section 30224 Recreational boating use; encouragement; facilities***

*Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors,* ***limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities****, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.*

***Section 30234 Commercial fishing and recreational boating facilities***

***Facilities serving the commercial fishing and recreational boating industries shall be protected*** *and, where feasible, upgraded. Existing commercial fishing and recreational boating harbor space* ***shall not be reduced*** *unless the demand for those facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, where feasible, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry.*

***Section 30234.5 Economic, commercial, and recreational importance of fishing***

*The economic,* ***commercial, and recreational importance of fishing activities shall be recognized and protected.***

The impact to commercial fishing and whale watching boats is not evaluated in the DEIR. Commercial fishing includes true commercial fishing vessels as well as boats that charge to take recreational fishermen out to fish. The limited and poor configuration of the parking, the limited and awkward access to slips, and the limited hours and low height of the pedestrian bridge could be devastating to commercial fishing and whale watching. This could be mitigated by moving the commercial fishing out of Basin 3 and providing space in other marinas, but this is not cited as a mandatory mitigation in the DEIR. Also, the basin is not the preferred location of most recreational boaters due to lack of openness of this marina already. This condition is exacerbated by the dramatic increase in development and the new road, the awkward access, the limited and inconvenient parking, and the limited hours of bridge operation. Overall the impact to commercial fishing is not consistent with the cited sections of the Coastal Act.

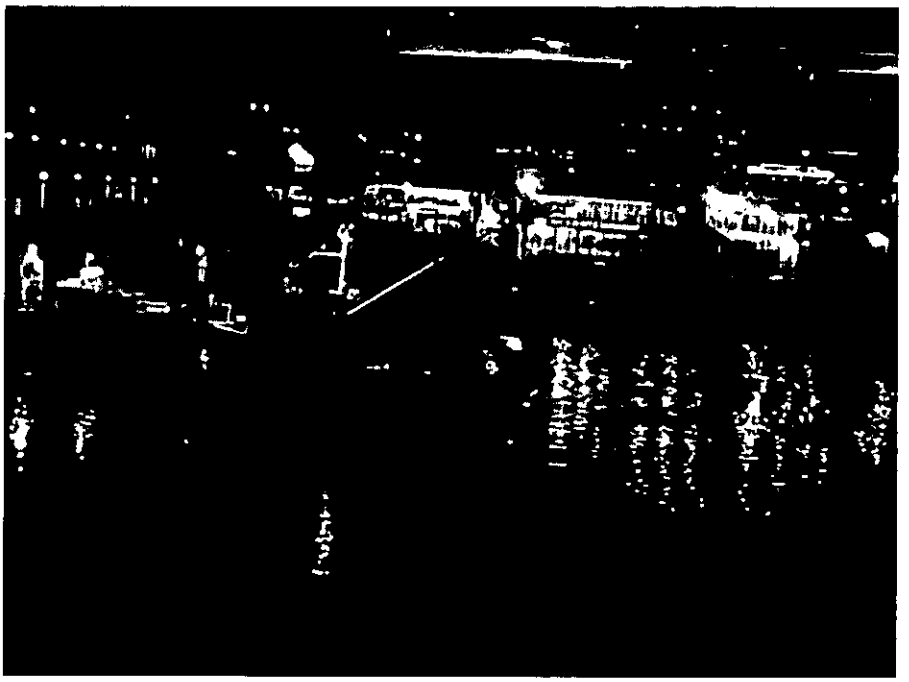

***Figure 19: Commercial fishing boat returns to Basin 3 late in the evening. Limited pedestrian drawbridge hours would preclude commercial fishing from this basin.***

***Figure 20: Commercial fishing vessels dominate Basin 3 giving it a unique charm. The the pedestrian drawbridge and halving of slips would drive these users out of the basin.***

***Section 30251 Scenic and visual qualities***

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

***Section 30252 Maintenance and enhancement of public access***

*The location and amount of new development should maintain and enhance public access to the coast by ...(4) providing adequate parking facilities or providing substitute means of serving the development with public transportation...*

As stated on previous occasions, the project described in the DEIR prioritizes non-coastal dependent development over coastal dependent development and existing coastal dependent uses. Coastal dependent uses like the trailer boat ramp, the launch point for paddlers and kayakers and the Seaside Lagoon are all crammed tightly together in a small area of the project with insufficient and inconvenient parking and access. The colocation of these uses creates hazards that don't exist today. And of course the best evidence of the prioritization is the road required to support the commercial development paving over a large portion of Seaside Lagoon Park rather than taking up the commercial space allocation. As a harbor the Coastal Act clearly requires coastal recreational and boating uses are given priority over the non-coastal dependent commercial uses:

***Section 30255 Priority of coastal-dependent developments***

***Coastal-dependent developments shall have priority over other developments on or near the shoreline.*** *Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate,* ***coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.***

***The project described in the DEIR is not compliant with the Coastal Act and the City's Local Coastal Program, Land Use Plan and Implementing ordinances.*** The priorities are backwards. Per the Coastal Act the harbor area should prioritize commercial and recreational boating, stand up paddling, kayaking, fishing, and use of the unique coastal amenity, the Seaside Lagoon. Instead the project prioritizes the non-coastal dependent uses at the expense of existing coastal dependent uses.

Parking is configured to support the commercial development and is inconvenient and a deterrent to recreational uses of the harbor. Parking for the trailer boats is less than one third of what exists today and is below state guidelines. The assessment for parking requirements ignores stand up paddlers, kayakers and users of Seaside Lagoon. The recreational value of Seaside Lagoon is impacted as the pool is filled in, lifeguards, the kids' water fountains, and water slides are eliminated. The road required to support the commercial development paves over a significant portion of the usable land in Seaside Lagoon Park. Recreational users are crammed into one small area of the project creating use conflicts and hazards that do not exist today. Seaside Lagoon is also paved over for a few extra surface level parking spots that are not reserved for Lagoon users. Where Seaside Lagoon is served by nearby restaurants today, the plan takes up more park space by building concessions on what today is usable parkland. And the parkland is configured such that it shrinks as the tide rises. The sport fishing pier is optional. The project could eliminate half the boat slips. Parking and access to the slips is inconvenient. And use of the marina is limited by the hours of operation of the pedestrian bridge servicing the commercial development. **When you put all these facts together, it is clear the project is not compliant with the Coastal Act and City Local Coastal Program requirements. It turns an area that is primarily a harbor into a Restaurant, Retail, Entertainment development that significantly and artificially limits and impacts the capacity and desirability of coastal dependent recreational and commercial uses of the harbor.**

***The DEIR is deficient as it does not accurately reflect these significant impacts nor does it put any real effort into identifying potential alternatives and mitigations. The project priorities conflict with the Coastal Act.***

### 5.4. Proposed Land Swap with the California State Lands Commission

The DEIR proposes a land swap of a portion of Mole D for Basin 3. This swap is not in the best interest of the residents of California. Today, Californians enjoy the protected uses of both Mole D and Basin 3. As an established navigable water, Basin 3 is already protected by Federal Law, 33 U.S. Code Chapter 9 - PROTECTION OF NAVIGABLE

WATERS AND OF HARBOR AND RIVER IMPROVEMENTS GENERALLY.

The trade would provide residents protection for waters already protected and eliminate protections for a beloved coastal asset in our harbor. It is clear the DEIR proposes this swap because the developer intends to dramatically repurpose this area for intensive, private, commercial uses.

The proposed swap does not comply with PUBLIC RESOURCES CODE - PRC DIVISION 6. PUBLIC LANDS PART 1. ADMINISTRATION AND CONTROL OF STATE LANDS CHAPTER 4. Administration and Control of Swamp, Overflowed, Tide, or Submerged Lands, and Structures Thereon; ARTICLE 1. Administration and Control Generally Section 6307.

> *6307. (a) The commission may enter into an exchange, with any person or any private or public entity, of filled or reclaimed tide and submerged lands or beds of navigable waterways, or interests in these lands, that are subject to the public trust for commerce, navigation, and fisheries, for other lands or interests in lands, if the commission finds that* ***all*** *of the following conditions are met:*
>
> *(1) The exchange is for one or more of the purposes listed in subdivision (c).*
>
> *(2)* ***The lands or interests in lands to be acquired in the exchange will provide a significant benefit to the public trust.***
>
> *(3) The exchange does not substantially interfere with public rights of navigation and fishing.*
>
> *(4) The monetary value of the lands or interests in lands received by the trust in exchange is equal to or greater than that of the lands or interests in lands given by the trust in exchange.*
>
> *(5) The lands or interest in lands given in exchange have been cut off from water access and no longer are in fact tidelands or submerged lands or navigable waterways, by virtue of having been filled or reclaimed, and are relatively useless for public trust purposes.*
>
> ***(6) The exchange is in the best interests of the state.***
>
> *(b) Pursuant to an exchange agreement, the commission may free the lands or interest in lands given in exchange from the public trust and shall impose the public trust on the lands or interests in lands received in exchange.*
>
> *(c) An exchange made by the commission pursuant to subdivision (a)* ***shall be for one or more of the following purposes****, as determined by the commission:*
>
> *(1) To improve navigation or waterways.*

*(2) To aid in reclamation or flood control.*

*(3) To enhance the physical configuration of the shoreline or trust land ownership.*

*(4) To enhance public access to or along the water.*

*(5) To enhance waterfront and nearshore development or redevelopment for public trust purposes.*

*(6) To preserve, enhance, or create wetlands, riparian or littoral habitat, or open space.*

*(7) To resolve boundary or title disputes.*

*(d) The commission may release the mineral rights in the lands or interests in lands given in exchange if it obtains the mineral rights in the lands or interests in lands received in exchange.*

*(e) The grantee of any lands or interests in lands given in exchange may bring a quiet title action under Chapter 7 (commencing with Section 6461) of Part 1 of Division 6 of this code or Chapter 4 (commencing with Section 760.010) of Title 10 of Part 2 of the Code of Civil Procedure.*

As stated previously, this exchange is not in the best interest of the public trust or the state as it proposes a trade for existing navigable waters that are already protected. Furthermore, the exchange does not meet any of the requirements of subparagraph (c).

- The exchange does not improve navigation or waterways. In fact the proposed project has negative impacts on navigation of the waterways by limiting access with a drawbridge that operates limited hours.
- The exchange does not aid in reclamation of flood control.
- The exchange does not enhance the physical configuration of the shoreline or trust land ownership.
- The exchange does not enhance public access to or along the water. The area already provides access along and to the water. In fact the density and intensity of development will impede access to and along the water.
- The exchange does not enhance waterfront development for public trust purposes. In fact the project increases the private commercial development of this section of the harbor.

- The exchange does not preserver, enhance or create wetlands, riparian or littoral habitat, or open space. In fact, public open space will be reduced in this section of the harbor. Particularly parking for recreational uses of the harbor will be negatively impacted.

•The exchange does not resolve boundary disputes.

If the City desires a land swap with the California State Lands Commission, it should protect the interests of the people of California. The proposed deal represents a net loss to the people of California.

# 6. Recreational Use Impacts

As previously described in the Land Use section, Redondo has never achieved its standard of 3 acres of parkland per 1000 residents. By state standards Redondo is "underserved" for parkland even when counting the county beach as Redondo parkland.

This lack of recreational resources is mirrored by public testimony noted in city documents.

> *"King Harbor*
> *Many participants in the Public Input Program indicated that they valued the marina. Some participants requested improvements to further increase the appeal of this City resource. They felt the harbor should be a destination point. Participants suggested that* ***more recreational opportunities*** *be made available for the general public including areas for picnicking, trails, and/or a promenade along the edge of the marina. Participants felt that additional facilities, such as a* ***museum, skateboard park, and athletic fields*** *should be constructed to attract visitors and residents. In addition, participants suggested integrating* ***more green space in the harbor****. "*[17]

Note the emphasis on recreation and useable public open space and public attractions. More restaurants, movie theaters, retail shopping and hotels are not mentioned.

> *"New Parkland & Recreation Facilities*
> *The majority of residents who were interviewed said they believed* ***additional parkland and recreational facilities*** *would benefit the City. However, participants acknowledged that Redondo Beach is fairly built-out and that very little vacant land remains for park development. Participants requested that the City* ***prioritize green space acquisition in the harbor area.*** *A number of sites and buildings were suggested during the Public Input Program as potential*

[17] General Plan, Parks and Recreation Element, pages 3-161,162

*locations for new parkland and/or recreation facilities, including the AES power plant site, City yards, the former Camacho's restaurant, the octagonal building near the harbor, and vacant occupancies on the pier."*[18]

Again, the clear cry for more parkland and recreational facilities is evident. The Comacho site is now the Shade Hotel. This Octagonal building referenced was demolished and is currently used for "Summer Movies at the Pier" public events. This project, however, fills this public space with dining, retail and hotel uses rather than capitalizing on it as a usable public space. And the pier is adding development not public usable space.

*"General Themes:*
*There is a* ***deficit of parks and recreational facilities*** *in the City.* ***Additional parks and recreation facilities are needed to adequately serve the current and future populations of Redondo Beach.*** *The City is approaching build-out, and there are few available vacant parcels remaining to develop new parkland or recreational facilities. It will be necessary to supplement the existing inventory with other types of recreational resources."*[19]

Clearly, the lack of public parkland and recreation is a recurring theme. As we will demonstrate in this section, the proposed project has significant impacts on existing coastal-dependent recreational uses of the harbor. And we should remember, this is a harbor built for recreational boaters with taxpayer money. The project should not impact the very purpose for which the harbor was built.

## 6.1. Thresholds of Significance

As written DEIR would not assess negative impacts to current recreational uses as a significant impact. It only assesses a significant impact if it would drive overuse and deterioration of an existing recreational asset or if it added a recreational feature that would have adverse environmental impact.

The DEIR fails to highlight a key threshold of significance - **any impact of the proposed development that would limit, deter or eliminate existing recreational resources and their capacities today, particularly coastal-dependent recreational resources, would represent a significant impact.**

As will be shown in this section, there are multiple recreational uses that will be significantly impacted due to development intrusion and constraints on the recreational use, reduced accessibility, insufficient and inconvenient parking, creation of hazardous conditions, and/or decreased appeal and usability of the recreational resource.

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[18] General Plan, Parks and Recreation Element, page 3-163

[19] General Plan, Parks and Recreation Element page 3-167

These impacts of the proposed project violate state and local land use regulations as described in the land use section of this document, and they should result in an assessment of significant impact with proposed mandatory mitigations.

### 6.2. Recreational use of Seaside Lagoon

Seaside Lagoon is a unique coastal-dependent recreational attraction that provides a very controlled, waveless and tideless seawater, sand bottom pool complete with lifeguards, kids' play fountains, small kids roped off play area, and water slides surrounded by a sand beach, grassy areas, barbecues, play equipment, volley ball court, picnic tables, umbrellas and a lanai. Water quality is maintained to public swimming pool standards and is regularly tested. Dressing rooms and restrooms are provided onsite. Food is available from Ruby's restaurant which has a service window for the park right on the parks eastern border. Ruby's does not reside within the parks boundaries.

Parking is immediately adjacent to the facility on 3 acres of city property. This parking lot is shared by trailer boaters and visitors to the sport fishing pier, hand launch boat ramp, and other commercial uses in the vicinity. Parking is not on the designated parkland itself.

Due to the safe and controlled environment and unique sand bottom and beach the park is very well used by families from a wide region. In fact, the park is probably the most attended park in Redondo during the months it is open. Based on data provided by the City (see Appendix A), the park had:

- **81,328 day guests**
- **589 kids participating in day camps**
- **73 events**

Other major annual events include 4th of July, Lobster Fest, Paddlefest, Ohana Fundraiser, and Sea Fair. On average, the Seaside Lagoon accommodated 753 visitors per day. **On peak weeks, this average jumped to 1,218 visitors per day.** Peak day counts were unavailable from the city. And on average the Seaside Lagoon supported over four events per week.

The attendance statistics alone demonstrates the popularity of this unique, coastal dependent, recreational parkland, but it is also reflected in public testimony.

> *"Public workshops conducted as part of the Project effort recognized this area [Seaside Lagoon] as one of the* ***most precious and well-used public spaces*** *in the City."* [20]

[20] Heart of the City Final EIR, page III-156

*"... Because of its popularity, participants would like to see the Lagoon **enlarged**, longer operating hours, more off-season events, a better snack facility, and a larger and more secure storage facility....."*[21]

### 6.2.1. Impact of replacing pool with harbor swim feature and combining uses with the hand launch boat dock

#### 6.2.1.1. Swim feature water quality

Currently, the water quality of the saltwater in the seawater pool is maintained by filtering and chlorination. The pool quality is monitored and maintained at standards of any public pool in California. Staff reports to city council show very low fecal and general coliform counts, well within state standards.

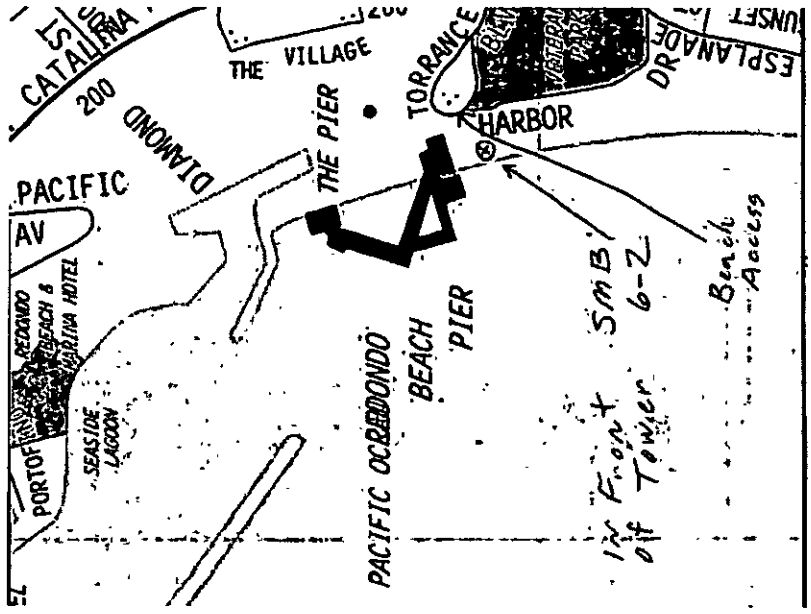


***Figure 21: City records act response shows location of water quality testing utilized by DEIR well outside harbor waters. Obviously, these tests cannot be used to determine water quality at the proposed Seaside Lagoon water entry in the harbor.***

The project would have swimmers using harbor waters instead. But **the water quality of the harbor water has not been evaluated.** According to a City response to a California Public Records Request (see Appendix B), the DEIR did not conduct or use any test data from harbor waters. Rather, where the DEIR does address water quality, it utilizes data from a site south of the horseshoe pier, well outside the harbor over 0.4

[21] General Plan, Parks and Recreation Element, pages 3-161,162

miles from the proposed Seaside Lagoon harbor entry (see Figure 21). One can hardly draw any real conclusions from these water tests, except that the waters in the harbor are most likely worse on any occasion due to the harbor's limited water exchange, boating impacts, the large resident sea lion population, and bird droppings washing off the break walls.

Swimming beaches inside harbors have some of the worst track records of water quality on the coast. The Cabrillo beach inside the Port of LA breakwater has had consistent water quality issues despite spending millions on replacing sand and adding water exchange and circulation pumps.

> *"Heal the Bay remains concerned with the poor water quality still observed at Cabrillo Beach harbor side Beach, despite extensive water quality improvement projects including: replacement of beach sand in the intertidal zone, removal of the rock jetty, installation of water circulation pumps, and installation of bird exclusion devices. With more than $15 million invested in improving water quality at Cabrillo's harbor- side, the beach is still violating TMDL limits. In a last-ditch effort towards improving beach water quality at the inner beach, the City of Los Angeles has agreed to:*
>
> *1) expand existing bird exclusion structure into the tidal zone and across the beach face;*
>
> *2) design and implement an improved water circulation system; and*
>
> *3) commence an in-depth source identification study to potentially identify and mitigate sources of bacteria.*
>
> *The bird exclusion structure and circulation system are scheduled to be completed by the end of 2012."*[22]

Despite the expenditure of over $15M, Cabrillo Beach harbor side has continued to exceed safe swimming limits and is rated one of the top 10 worst beaches every year. (see Figure 22)

> *"2. Mother's Beach, Marina del Rey*
> *With another year of extremely poor water quality, Mother's Beach, in Marina del Rey, moved up the Beach Bummer list from 3rd place to 2nd. It appears that the installed circulation devices are not doing enough to improve water quality at Mother's Beach.* ***As with most enclosed waterbodies throughout the state,***

[22] Heal the Bay, 2011-2012 Beach Report Card

***poor water quality is exacerbated by poor water circulation. Three of the top Beach Bummers are located with enclosed waterbodies.***"[23]

*"Inner Cabrillo Beach in San Pedro is the prime example of* ***poor water quality caused by the poor circulation of an enclosed waterbody. In contrast, outer Cabrillo Beach (ocean side, 400 feet away) received A/A+ grades throughout the year.***"[24]

This shows that not only does water quality dramatically change inside and outside a harbor but also that enclosed bodies both north and south of Redondo Beach suffer from regular water quality issues that would prevent swimming.

**FIGURE 4-1: GRADES FOR POPULAR ENCLOSED BEACHES 2014-2015**

| Baby Beach, Dana Point | Summer Dry | Winter Dry | Wet Weather |
|---|---|---|---|
| West end | A | A | A |
| Buoy line | A | [illegible] | A |
| Swim area | A | D | B |
| East end | B | B | F |
| **Mother's Beach, Marina del Rey** | | | |
| Playground area | F | F | F |
| Lifeguard tower | F | F | F |
| Between tower/boat dock | F | F | F |
| **Inner Cabrillo Beach, San Pedro** | | | |
| Harborside at restrooms | D | B | F |
| Harborside at boat launch | B | A | F |

***Figure 22: Heal the Bay Beach Report Card shows the repeated poor quality of beaches in enclosed waters***

The DEIR study shows that water exchange rates in the this part of the harbor would take about two days to clear a pollution event. And there is no data to say how often the water quality thresholds would be violated per year. But there is ample data that shows harbors north and south of Redondo Beach have repeated water quality issues that would prevent swimmers from using the Seaside Lagoon as the project proposes.

We also have specific conditions that are unique to our site. One is the proximity to the Sea Lion barge. Sea Lion defecation in the vicinity of the protected lagoon entry is likely

[23] Heal the Bay 2014-2015 Beach Report Card

[24] Heal the Bay 2014-2015 Beach Report Card

to impact water quality substantially. Likewise prevailing winds blow garbage in the protected area and break water tends to trap the garbage as evidenced in Figures 23 and 24. Should the new trailer boat ramp be upwind of this site, the oil, gas, trash and other pollutants associated with the boats and boaters would be blown straight into the Seaside Lagoon entry to the harbor and trapped there by the break water further exacerbating this situation.

***Figure 23: Watermelon rind and kelp trapped in rocks at location where Seaside Lagoon would be open to harbor.***

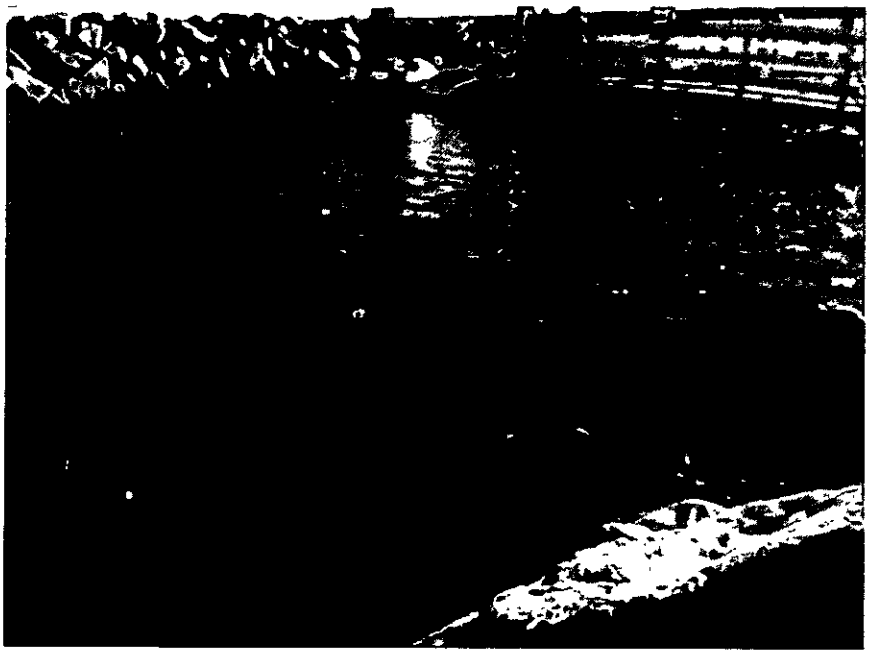

***Figure 24: Floating water bottles, trash and kelp blown into proposed Seaside Lagoon entry by prevailing winds and trapped by break wall.***

Lacking specific test data over long periods of time, it is reasonable to conclude that the water quality at the proposed Seaside Lagoon entry to the harbor is likely to regularly exceed safe standards. Certainly, ***the project should not be approved without proactively proving the water quality in the harbor would be consistently safe for swimmers.*** Finding out after-the-fact, that the water quality precludes most swimming, would be too late.

**6.2.1.2. Impacts on use of reconfigured Seaside Lagoon for swimming**

Currently, Seaside Lagoon is attractive to parents for the following attributes:

- Clean water filtered and treated water
- Sandy beach and pool - simulates ocean beach without risk
- Gently sloping depth with roped off area for small children
- Plenty of lifeguard protection
- Slides and water fountains to keep kids entertained
- Enclosed area to prevent kids from wandering off
- Lack of tidal and wave action, sand bars, etc.
- Food convenient to site
- Close parking - don't have to lug gear far
- Close restrooms

It is clear that multiple attributes make the current Seaside Lagoon such a popular recreational area. Figure 25 compares each of these attributes and a couple added attributes to assess the impact of the proposed reconfiguration.

| Attribute | Current Configuration | Proposed Configuration |
|---|---|---|
| Size water area | Stable, proven adequate for current attendance | Likely much smaller, and changes dramatically with tide, dredging likely required to maintain depth |
| Size usable beach/grass | Stable, proven adequate for current attendance | Changes dramatically with tide, park over is 1/3 smaller |
| Sandy beach and water feature | yes | yes |
| Water Quality | Controlled | Likely to exceed safe limits regularly |

| Attribute | Current Configuration | Proposed Configuration |
|---|---|---|
| Depth | Non-changing, roped off area for wading kids | Changes dramatically with tide, cannot rope off safe depth |
| Lifeguard protection | Yes on all sides | No according to DEIR consultant, limited to shallow end even if there are lifeguards |
| Slides and water fountain features | Yes | No |
| Enclosed to keep kids protected and controlled | Yes | No |
| Tide and wave dangers | No | Tide and sand bar depth changes, not likely to be significant waves |
| Food availability | Yes, concession external to park boundaries. | Yes, but concession cuts into beach area available |
| Close parking | Yes | No, will have to fight for space in parking structure and lug kids and gear through the parking structure, through a shopping area and across an active street |
| Close restrooms | Yes | Yes |
| Potential Sea Lion haul out | No | Yes |
| Conflict with other harbor users | No | Yes |

***Figure 25: Comparison of key attributes of Seaside Lagoon as is and as proposed. Clearly, the features that make the lagoon attractive for parents are significantly impacted by proposed plan.***

**Swimming area size** - There is no discussion about how swimming would be controlled in the reconfigured Seaside Lagoon. It is unlikely the city would allow swimmers in the turn basin, whether or not the trailer boat ramp remains in the primary position discussed in the DEIR. Swimmers are not very visible to boaters and especially boaters

occupied with dropping sail or avoiding other vessels. Thus the reasonable assumption is swimming would be limited to inside the small breakwater at the site. This is actually a very small area that would change substantially in depth with tide as shown in Figures 26 and 27.

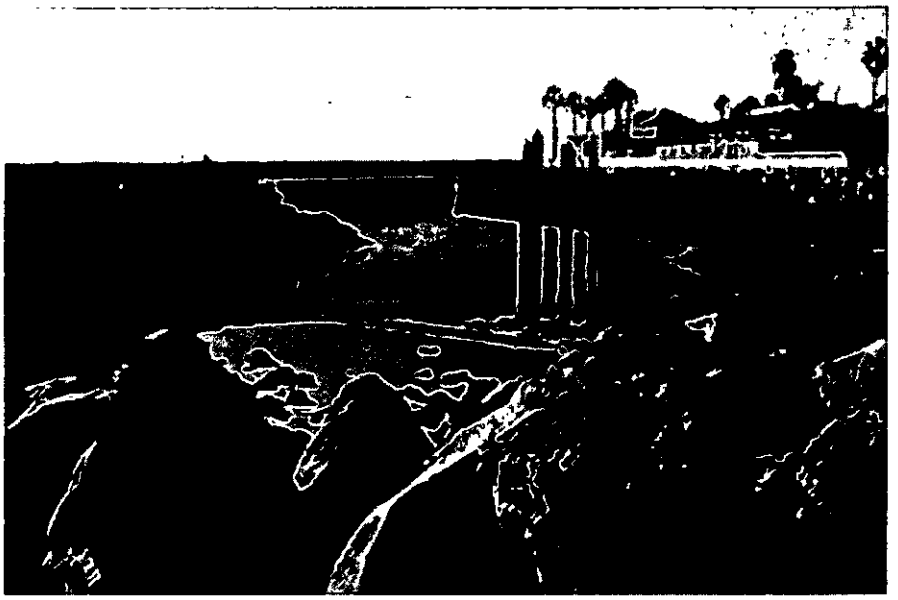

***Figure 26: Note how small the area bounded by the breakwater on the left is. Also this shot at low tide shows the dramatic affect tide will have on depth and size of the water area.***

***Figure 27: The impact of tide is very apparent in this image. At mid tide, the water is up to the inner break wall with no sand bottom showing (see Figure 24)***

Estimates based on the DEIR plan views and the known dimensions of the current configuration show the swim area going from about 400' x 140' in today's configuration to about 140' x 150' at mid-tide in the proposed configuration. This represents a dramatic loss in swim area. An unknown variable ignored by the DEIR is how much this area will shoal over time (as evidenced in Figure 27) and how much redredging would be required to maintain usable depths at low tides. Also it is likely sand on the beach would have to be replenished as it is pulled into the harbor by tides, waves, and rain runoff. The DEIR is silent on all of these very real concerns related to the long term usability and maintainability of the proposed configuration.

Regardless, the loss of the many attributes that make the current lagoon attractive to families with young children disappear in the proposed configuration. Even if the water areas were the same size, attendance would never achieve the levels of today.

### 6.2.1.3. Impact of combining water recreational uses

The DEIR does not have solid facts and figures on harbor use by Stand Up Paddlers, kayakers and outrigger canoers. According to the Recreational Boating and Fishing Foundation the sport of kayak fishing has grown to 1.978M people in the US. Stand Up Paddle boarding has exploded. According to the 2015 Special Report on Paddle sports, Stand Up Paddle boarding has grown every year since 2010, when the industry consortium started gathering statistics. Participation is currently at 2.8M people who went on 13.7M outings in 2014. According to census data, 2% of the population in the Pacific states participate in Stand Up Paddling. This trend has been noted in recent public forums about SUP'ing in King Harbor.

> *"Stand-up paddling is not a fad," he [Gene Smith, owner of Tarsan Stand-up Paddle boards] said. He compared the sport's growth to that experienced by snowboarding. "When people tell me they think it's a fad, I ask them 'Do you ski, or snowboard?'"*
>
> *Harbor Patrol Tim Dornberg confirmed the shop owners' belief in the sports staying power.*
>
> *"I've been a boater for 40 years and a harbor patrolman for 25 years and I've never seen a sport grow exponentially like stand-up paddling," he said. "I'm on my fourth paddle board," he added.*[25]

[25] " Stand-up paddlers in Redondo Harbor get boaters, harbor patrol support" , Easy Reader, Oct 17, 2012

By any objective measure both sports are popular activities in King Harbor. The DEIR study on current boat traffic did not have any actual counts of use of the current hand launch boat dock. It estimates 50 launches per day on peak weekends. In our experience, this count seems low. Ownership is growing as the sport grows and the hand launch is the only publicly available, legal, launch point in the calm harbor waters. The DEIR estimates at least 200 SUP rentals on peak weekends.

While the DEIR project description lacks any detail about how the shared water feature would be used for swimming and for a kayaking/paddle boarding launch point, there are only two real alternatives.

One alternative would be to allow both uses to mingle. This would be hazardous to kids swimming and playing near beginning paddle boarders or kayak fishermen. Beginner paddle boarders fall without being able to control where their board is going, where their paddle goes and where they themselves fall. Playing children could easily be struck by the paddle, the paddle or the board. Likewise, with kayak fishermen, small kids could grab equipment on the kayak and injure themselves or damage the equipment. So this approach introduces real hazards that don't occur today.

The second alternative would be to divide the water by float lines to designate a swimming portion and a portion for the kayakers/paddlers. As discussed in the previous section, the size of the usable water area drops dramatically in the DEIR proposed project. This solution would further exacerbate the loss of usable water area.

No matter which solution is implemented, it makes the area less desirable for parents of small children and artificially constrains the use of the Seaside Lagoon. And the inconvenient parking is likely to impact both uses.

#### 6.2.1.4. Beach reconfiguration impacts

The proposed reconfiguration of Seaside Lagoon shrinks the usable portion of the park by 1/3rd. That area is then subject to tides. The DEIR clearly shows the dramatic loss of beach area at high tide, but even at low tide the usable area is smaller than today. The fence is gone, so the comfort of having kids confined to a controlled area is gone as well. There is an active roadway crossing the park in extremely close proximity to the park beach and there is exposure to strangers. It is questionable whether day camps could operate in this smaller and less controlled environment. The loss of usable beach and the loss of the controlled area combined with the close proximity of the road, and strangers impact the appeal of the park for families with young children. Add kayakers and SUP'ers traversing the area with their equipment and gear and the problem is only exacerbated. ***In response to a California Public Records Act Request, the City responded that they had no estimate of the loss of usable parkland land area based on the proposed project. The DEIR does not provide any evaluation of the impact of the loss of usable beach area either.***

### 6.2.1.5. Parking configuration impacts

Currently families can park immediately adjacent to the Seaside Lagoon in a 3 acre surface parking lot. SUP'ers and kayakers can access the hand launch boat ramp by the access road (as shown in Figure 28), drop off their gear and equipment and park immediately adjacent to the ramp while keeping their gear in sight. Anyone trying to pilfer the equipment would have to load it in a vehicle and head out the only exit to the hand launch boat ramp in full view of the owner. And the distance from the surface parking to the hand launch ramp is a short distance - easy to carry an SUP or wheel a kayak if a user does not want to drop off their equipment right at the dock.

***Figure 28: SUP'ers lined up to offload their SUP's at the hand launch boat ramp. Users must turn around to exit as their is no exit in the direction the vehicles are pointing. Stealing a dropped off board or kayak would be difficult due to this configuration.***

While the proposed reconfiguration shows approximately 40 to 50 surface parking spaces in near proximity to the Seaside Lagoon. The DEIR is silent as to how these parking space may be restricted, but it is doubtful the parking could be effectively managed to support on Seaside Lagoon users. Regardless, with an average of 753 users per day, not counting the kids camp or private events, and assuming conservatively that users would come four to a car, on the order of 175 car spaces would be required. And then the stand up paddlers, kayakers and other users need to

be added. None of these users are included in the parking assessment in the DEIR. The only remaining parking is some of the few surface parking spaces further south in the private road or the parking structure.

Families going to the Seaside Lagoon for the day would have to negotiate their kids and all their toys and gear through the parking garage, through shops and restaurants, and then across an active road and parking spaces to reach the park. Other than day camp users, it is unlikely parents would drop off their kids and then find parking.

Stand up paddlers and kayakers would face similar problems. Hauling a kayak or SUP through a parking garage, through shops and restaurants, across an active road and parking spaces to reach the beach is asking for gear and vehicle damage and exposing shoppers and restaurant goers to being whacked in the head by a kayak, paddle, fishing gear, or an SUP. It is doubtful that kayakers and SUP'ers would drop off their board, kayak and equipment and then leave to find parking. The nearby road makes it very easy to pilfer equipment and leave before anyone finds out.

***The loss of nearby surface level parking is a real and significant deterrent to use of the park by those who use it the most today.***

**6.2.1.6. Trailer Boat Ramp Impacts to swimmers and paddlers**

While the DEIR discusses several alternatives for the location of the trailer boat ramp, most of the DEIR treats the ramp location as the current Joe's Crab Shack site adjacent to the Seaside Lagoon Park. The DEIR study recommends other locations to prevent the risk of hazardous interactions between the boats and paddlers. While it suggests a potential mitigation of a buoy line separating exiting and entering traffic, this only mitigates part of the problem.

The breakwater required to calm waters at the boat ramp would create a blind spot for boaters who would not be able to see paddlers returning to the Seaside Lagoon launch point. This blind spot combined with task saturation when getting underway creates a hazardous condition. Perhaps more alarming is that both the boater and paddler may be neophytes unused to rules of the road and how to handle their watercraft to quickly resolve a dangerous crossing action.

And finally, the pollutants and trash that are inevitable from the boat ramp would be blown right into the swimming area by prevailing winds.

Locating the trailer boat ramp in close proximity to paddle craft is a dangerous situation and should be avoided no matter where the boat ramp is ultimately located.

**6.2.1.7. Sea Lion Haul Out at Seaside Lagoon**

The opening of Seaside Lagoon to the harbor exposes the lagoon to potential use as a Sea Lion haul out. Sea Lions have hauled out at similar beaches in Cabrillo and Marina Del Rey. The close proximity of the growing number of sea lions using the Sea Lion barge increases the potential for haul out on the beach of the reconfigured Seaside

Lagoon. Indeed, the current Marina Manager has already encountered sea lions in the parking lot inside of the current Seaside Lagoon.

> *"We have a problem," said Leslie Page, the property manager of Redondo Beach Marina. "I've had five of them wandering around the parking lot. I had one knock on the front door of the marina office next to R10 Social House (restaurant)."*[26]

The DEIR admits there may be a problem. And the statement above certainly shows the possibility to be foreseeable. The DEIR states the city will have a management plan approved. It is questionable such a plan would be approved. Two communities in Southern California have been unsuccessful in convincing state and federal officials to approve their plans to move pinnipeds off their beaches.

And even if the City does get such approval, what will be the reporting mechanism and response time? Kayak fishermen go out very early in the morning. Most SUP'ers go out after work during the weekdays. That is a long and expensive time to keep a public official available to chase off a sea lion. And **how is a returning paddler to contact the appropriate authority. The operational details should be available to public so they may assess the real impacts.**

Interaction of sea lions with children is dangerous. Many kids have little fear of the cute, friendly looking creatures. And imagine the situation where you have kids on one side and a paddler coming into the confined waters. ***A sea lion that feels trapped is a dangerous sea lion.***

**The DEIR states interactions are minimized by the change in configuration, but that makes no sense.** Certainly the current configuration prevents any interaction between the sea lions and the users of Seaside Lagoon. ***Clearly, the less impactful solution is to keep Seaside Lagoon separate from the harbor waters.***

***If the City is determined to open the Seaside Lagoon, approval of the management plan and addressing the operational issues should be mandatory prior to the final EIR so that the public can fully assess the impact.***

### 6.2.1.8. Impacts of Seaside Lagoon reconfiguration on pedestrians

The current Seaside Lagoon configuration allows pedestrians to be right on the water's edge with great view of the harbor and launching and returning paddlers. It provides a contiguous path out to Portofino Way where pedestrians can walk along the water at the Portofino Marina in either direction. This promenade is well used by pedestrians and joggers today as shown in Figure 29. It could use some sprucing up but is well used and well liked.

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[26] "Sea Lion Population in King Harbor is 'out of control' "; Daily Breeze, Carly Dryden; April 24, 2015

***Figure 29: Pedestrians enjoying waterside path behind Seaside Lagoon on a cool winter day***

The configuration described in the DEIR routes the pedestrian path in amongst shopping and restaurant lease spaces with a road and parking very nearby and sand between the path and the waterfront. It then routes straight out to Portofino Way as depicted in the DEIR without returning to waterfront. Yet elsewhere, the DEIR evaluates that the current lack of the pedestrian path at the Joe's Crabshack site as a negative. The DEIR seems to ignore this with the primary project assessment and shows its pro-development bias.

The walk path today better meets the stated requirements of the zoning which is to have a pedestrian path along the waterfront. We can certainly make the current path far more attractive without all the overdevelopment and impacts of the proposed project.

### 6.2.1.9. Impact of opening Seaside Lagoon year round

The DEIR makes a big deal about opening Seaside Lagoon year round, as though that would suddenly facilitate more use of the park. Opening Seaside Lagoon year round would have little impact.

First, paddlers already can launch year round without fee and they have better parking and access today than in the proposed project. So the current conditions are better for paddlers of all types.

As to swimmers using Seaside Lagoon, once school starts and the weather and water get cool, not many would use the Lagoon in its current configuration. Attendance drops

off rapidly at both ends of the season based on city data. That is why the Lagoon closes for the year. Opening up the lagoon to the harbor introduces all of the negatives already discussed and does not represent any realistic increase in potential usage.

From a fee perspective, the fees are low and certainly attendance does not appear to be deterred by charging the current fees.

When you evaluate against all the criteria, shrinking the Seaside Lagoon usable park area, making parking inconvenient, and opening it up to tidal, untreated harbor waters is a significant negative impact on the most used park in Redondo Beach. The fact that the DEIR concludes otherwise shows the bias that has influenced the conclusions. And you see yet again how the private commercial development has been prioritized over the public, coastal dependent recreational uses of the harbor.

### 6.2.1.10. Open space in development replaces Seaside Lagoon loss

Consultants, CenterCal and City officials have tried to portray the open space amenities of the retail, restaurant development as an equitable replacement for the loss of Seaside Lagoon usable park space.

First, much of the open space attributed to the retail/restaurant development exists today. For example, the perimeter pedestrian promenade, the open space on the pier, and the plaza leading into the current sport fishing pier all exist today. In fact, much of the usable open space today is covered over by development in the proposed plan such as Pad 2 on the Pier; the site of the old octagonal building currently used for outdoor public movies; the broad deck above the international boardwalk; and potentially the sport fishing pier. So in actuality, there is a net loss of publicly usable open space throughout the project area.

Second, much of the new plan's open space in the harbor area is simply amenities to serve the retail, restaurant development - a "Bellagio type" water feature, places to sit and eat outdoors for the nearby restaurants, a play area for kids. These amenities can be found at nearly every mall in the area. They are hardly equivalent of public parkland and especially a unique recreational park like Seaside Lagoon today.

Third, the uses provided in the retail/restaurant area of the project are neither public parkland nor are they coastal dependent recreational uses. Again, they are simply amenities for the shopping and dining.

***It is deceptive for the proponents of this development and the consultants who developed the DEIR to try to paint some equivalency between the shopping/ dining area open space amenities of the proposed project and the loss of usable space in Seaside Lagoon public parkland.***

## 6.3. Recreational use of new boat ramp

### 6.3.1. DEIR Primary Assessment

The Coastal Commission has mandated a trailer boat launch ramp be built with any new development in the harbor. The Commission feels that boat hoists currently used in King Harbor intimidate and deter trailer boaters from using King Harbor and that a boat ramp would increase usage.

The South Coast region has the highest boat ownership in the US. In 2001, the total ownership was at 245,380 owners. The projection for 2020 was an increase to 320,691 owners. The state predicted a need for 10 to 48 more boat ramps in our region.[27] Redondo is the only harbor in the 25 miles of coastline between Marina Del Rey and Cabrillo Marina in the Port of the LA. With well renown fishing spots like Rocky Point, there is no doubt there is a pent up demand for a boat ramp in King Harbor.

As spelled out under the Land Use evaluation of this document, current Redondo zoning requires 67 trailer parking spaces for the boat hoists. The parking analysis evaluates only 20 such spaces. Marina Del Rey currently has an 8 lane boat ramp with over 200 trailer spaces and Cabrillo Beach currently has a 3 lane boat ramp with over 100 trailer spaces. The California Department of Boating and Waterways' "Layout Design and Construction Handbook for Small Craft Boat Launching Facilities" calls for a minimum of 20 to 30 trailer parking spaces per lane. ***Restricting the proposed Redondo ramp to just 20 trailer spaces artificially limits the capacity of any planned boat ramp and represents a reduction in capacity from the current infrastructure.*** Given the pent up demand, the ramp should have at least 30 spaces per lane and it would reasonable to require a minimum of two lanes.

The DEIR specifically calls out space restrictions as limiting factors in the alternatives for the boat ramp. **This is a clear indication that the project prioritizes the non-coastal dependent shopping, restaurant, hotel and theater uses over the use of the harbor for boating.** This prioritization is the reverse of that required by the Coastal Act and the Local Coastal Program approved for Redondo as detailed in the Land Use section of this document.

Having to negotiate most of the way down the narrow Portofino Way, and then turning into the space constricted ramp parking lot only to find there are no parking spaces would be a very frustrating situation and generate needless traffic of a vehicle/trailer combination on very constricted roadways in the harbor area. This increases congestion, increases potential of accidents and increases the likelihood that frustrated boaters would be artificially deterred from using the ramp in the future. The situation is exacerbated by the location of the new parking structure further consolidating traffic congestion on these key and very constrained intersection.

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[27] California Boating Facility Needs Assessment Volume V, October 15, 2002

Add the proximity hazards represented by the paddlers launching from Seaside Lagoon and it only builds the case that this is a bad location for a new boat ramp.

The primary location at the Joe's Crab Shack site presents extreme challenges and is not the best alternative for recreational use of the harbor for boating. The site is too small and inconvenient from an access perspective. It represents a hazard to paddlers and swimmers.

### 6.3.2. DEIR Alternatives Assessment

The DEIR format makes it very difficult for the public to fully understand the full implications of each boat ramp alternative. Rather than describing each in full with its impacts, the alternatives are spread out through each individual DEIR assessment area, making it very challenging to integrate the information.

The DEIR exacerbates the confusing formatting by making broad and vague statements such as siting the boat ramp on Mole D would increase development on the northern section of the harbor, but then contradicts itself on how much development this would actually mean - it increases density but cuts back on development... how much in each case? Would deletion of the road allow recovery of Seaside Lagoon space? The public cannot know because the DEIR does not describe it. The alternative shows no lay down of the proposed alternative. The public cannot possibly assess the impacts based on this vague description. Moles A and B are not even included in the Project Scope. This DEIR is all over the map.

The assessments are not well supported. Some bias seems to have crept into a very shallow analysis. All but the primary alternative assess no breakwater, yet surge in the harbor, especially at Moles C and D is substantial and it would seem use of the ramps without new breakwaters would be unsafe. Also it would seem any floating docks would suffer battering that would require substantial maintenance. The assessments on other impacts like views for Mole D options are impossible to evaluate because no plan views of the resulting development are included. The hazards of the Mole D double ramp seem exaggerated. The ramp is far enough from the Basin 3 fairway to reduce risk. And professional boat skippers could easily use the far side of the sport fishing pier without posing any danger to paddlers using the hand launch boat ramp area. Also there is the question of whether the Mole D double ramp option could be moved somewhat more south to improve the space from the sport fishing pier. Another glaring missing assessment is that of the ability to maneuver vehicles with trailers in the recommended reconfiguration. Lack of maneuvering room increases traffic congestion on project roadways and creates property and personnel safety hazards in the ramp parking areas.

In the DEIR, Mole A comes out as a winner, but the assessment does not account for impacts of moving the yacht club to Mole B. It does not seem feasible to operate the yacht club and the boat ramp, especially the two lane boat ramp from the same site.

Additionally, the yacht club removes its floating docks every winter to prevent storm damage, it does not seem there was any assessment of this in the Mole A alternatives.

This represents a project DEIR. ***The City should pick a location for a boat ramp and then THOROUGHLY assess the project against that location. It is obvious the entire description of the impacts of the alternatives are not included in the DEIR.*** Figure 1, presented in the very beginning of this document presents a substantive change to the Mole A alternative that was neither fully described nor fully assessed for impacts. The description of alternative sites and sizes of the boat ramp opens more questions than it answers.

***This project DEIR description is not complete nor is its analysis thorough or consistent enough with respect to alternatives for the public to understand the project and assess its impacts.***

### 6.4. Recreational use of Basin 3 slips

Recreational use of Basin 3 slips is significantly impacted by this development. Unless the surface parking spots in the back of the Market Hall are reserved for boaters, the boaters are forced to trek through shopping and restaurants, across active streets, and through parking structures to get their gear and guests back and forth to their boats. The canyon created by the walling off of International Boardwalk and the development on the west side of the basin will echo the new traffic noise from the new Pacific Avenue into this echo chamber. And the limited hours of the pedestrian bridge will impact the desirability of these slips and impact safety. Boaters cannot always determine when they must return - weather, sickness, injury, shoreside emergencies, and mechanical failures can require a return anytime. The limited hours of the drawbridge affect any boater with a boat over 10 feet high at any point. Overall, the project makes these slips very undesirable to recreational or commercial users of the Basin.

Reducing slips is obviously a negative impact on recreational boaters. While the DEIR writes off the impact by saying there are currently slips available elsewhere in the harbor, pre recession there was a multi year waiting list for a slip at all marinas in King Harbor. With the economic recovery, we should realistically expect no different.

The project proposed by the DEIR is a significant impact to recreational boaters despite the DEIR's claims to the contrary.

### 6.5. Bike path usage

The bike track along Harbor Drive is complete. So the project does nothing to improve the bike path usage in this area. It does however make it more hazardous by introducing the driveway for the new parking structure and the street exit at Pacific and Harbor.

The claims of improvement of the bike path in the pier parking area are dubious. First,

the bike path on the south end of the project is routed against traffic on Harbor Drive. It then continues behind the hotel and parking structure on the far side of the new Pacific Avenue with traffic, the parking structure and the hotel between the bikes and the ocean.

This route does preclude walking your bike through the pier entry, but it adds the double hazard of having to cross the new Pacific Ave twice once on the south side of the project and once on the north side where it joins with the busy and confusing intersection of Pacific and Pacific and Harbor Drive and the new road in the harbor shopping area.

The taxpayers just spent $4.7M to move the bike track to the west side of Harbor Drive to avoid two crossings on Harbor Drive, one would think this project would not just move that very same problem to the new Pacific Drive reconnection. The project should be redone to keep bike traffic on the west side of Pacific to avoid the double crossing.

That still does not eliminate the impact of losing views of the ocean and pier while riding behind the hotel and parking structure. And along Harbor Drive, views of the harbor and ocean are decimated by the wall of development right along Harbor Drive with the megalithic parking structure and movie theater and other shops and restaurants.

As to the secondary bike path shared with pedestrians and crossing the pedestrian bridge, that proposal is deceptive. See Figure 30. Currently bike riders cannot even ride across the entrance to the pier. Redondo Beach Municipal Code 12-2-07 prohibits it. Similarly, bicyclists must dismount near the Hermosa Pier for blocks due to the hazards of bicycling with pedestrians. Even so, this area experiences repeated bicyclist/pedestrian collisions. This is especially hazardous with children and elderly pedestrians. It is simply unrealistic to try to portray that riding bikes can coexist with pedestrians in an active shopping, dining area.

DEIR Appendix L-1, Transportation Impact Study, page 20 actually points out current shared pedestrial/bicyclist spaces where bicyclists must dismount for pedestrian safety. ***It is odd that the same DEIR ignores this safety precaution when assessing the secondary bike routes through the new project. This is yet another obvious indication of the bias that has manifested in this DEIR.***

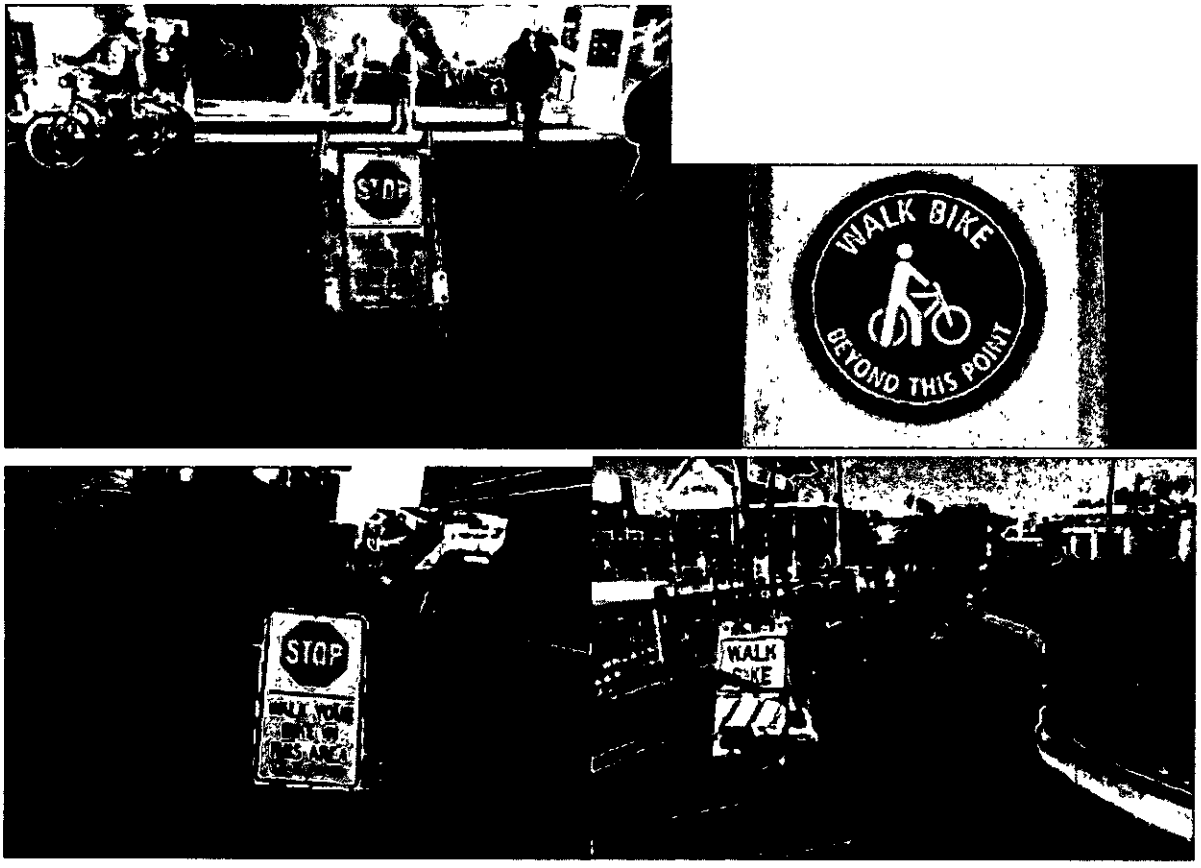


*Figure 30: Riding bike on harbor and pier pedestrian paths - not realistic, unsafe*

**Overall, the project negatively impacts bicycling with new driveway crossings, increased traffic crossing the bike track, and the odd routing to the far side of the new Pacific Avenue. At the very least, the new bike path through the hotel area should be routed to the west side of the new Pacific Ave. Any statements about the bicyclists sharing the same path as pedestrians should be removed. It is unsafe, unrealistic and deceptive.**

## 6.6. Recreational impacts of the sport fishing pier removal

The sport fishing pier in the harbor is a well loved and well used recreational asset that provides unique views, fishing inside the pier without having endanger ones self on the rock breakwaters, it provides a unique restaurant experience with local ownership and flavor, and it provides easy direct access for whale watchers and sport fishermen to board commercial vessels. Figure 31 shows a typical morning at the pier, families fishing together and waiting to get into Polly's on the Pier. The fisherman's shop on the sport fishing pier is the only shop in the harbor and pier of its kind. Neophytes can rent equipment there to get their first taste of marine sport fishing.

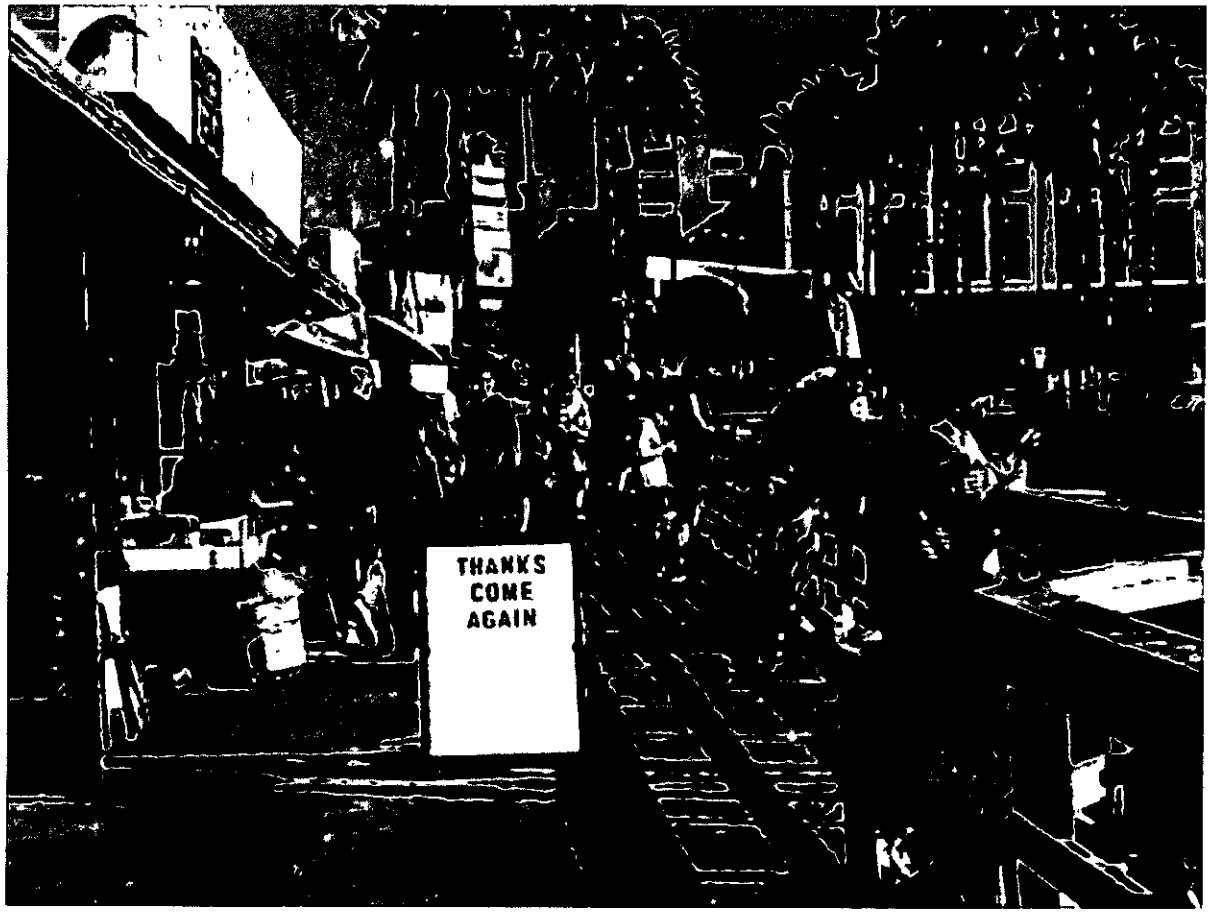


***Figure 31: A typical morning on the sport fishing pier: families fishing together, people walking out for the view, and family and friends waiting to get into Polly's on the Pier.***

The close proximity of the pier parking lot makes this a favorite fishing spot for those who have mobility challenges. It is a favorite for families with small children just learning to fish.

Aesthetically the pier has the charm of old wooden piers. It looks like it belongs in a harbor.. and has the feel of the historic Monterey harbor but on a much smaller scale. Figure 32 shows the view of the pier from the pedestrian promenade.

Obviously, removal of the sport fishing pier is a negative impact on this recreational and open space asset on the harbor side of the development. Loss of the proximity of surface level parking will negatively impact this attraction as well.

***Figure 32: The sport fishing pier provides a charming aesthetic to viewers from the pedestrian promenade and surrounding uses.***

**The assessment of the condition of the pier seems to be overly negative and suspect.** The Monstad Pier portion of the Horseshoe Pier and the Balboa pier are both wooden piers that have survived since the early 1900's. The sport fishing pier is decades younger and protected from heavy storm action. Maintenance and refurbishment are not even discussed, which also makes this assessment suspect. **There is no independent professional assessment of the condition of the pier.** It seems a convenient excuse to eliminate the cost of maintaining this well loved asset and used recreational asset.

***Loss of the sport fishing pier would be yet another negative impact of the proposed retail, restaurant, and entertainment on coastal dependent recreational uses in the harbor. The repair, refurbishment or replacement of the sport fishing pier should be mandatory under the project.***

### 6.7. Pedestrian assessment

While the DEIR makes much ado about the pedestrian promenade, in reality other than some aesthetics, the only real improvement is the pedestrian bridge. Yet the pedestrian bridge brings with it huge maintenance and operational costs while still negative impacting commercial and recreational boat use in Basin 3. Pedestrians can already circumnavigate the waterfront from the outer edge of the pier all the way to Joe's Crabshack today - and many do. And in two areas, the current configuration gets you closer to the waterfront that the project - in the International Boardwalk area and behind Seaside Lagoon. Clearly, the project makes it more aesthetically pleasing, but that can be accomplished without the massive overdevelopment and negative impacts represented by the project.

# 7. Traffic, access, parking and circulation impacts

## 7.1. Parking

As will be shown in the sections that follow parking represents a very significant impact to existing coastal dependent recreational uses of the harbor. **The parking provided is insufficient to meet the demand and the configuration presents risks and deterrents to recreational users of the harbor.**

***The project should be redesigned to prioritize sufficient, convenient, surface level parking for recreational users of the harbor area.***

Though evaluated in the visual impacts section, we repeat: ***the megalithic new parking structure at one of the main entrances to the harbor area represents a significant view and aesthetic impact to the whole harbor area.***

***The fact that the DEIR does not evaluate or even acknowledge these blatant shortcomings and impacts is yet more evidence of the bias that has crept into this evaluation.***

### 7.1.1. Parking need assessment

The parking assessment in the DEIR already admits the parking plan is over 200 space shy of Redondo requirements. While the plan increase retail, restaurant, hotel, office and entertainment development by 140%, the parking only grows by 8%. Somehow, the DEIR tries to wave this off and concludes there is no impact.

**The plan includes zero parking assessment for paddlers who own their own equipment and launch out of the Seaside Lagoon area. And it does not account for the current level of use of the Seaside Lagoon.** As mentioned earlier, the Seaside Lagoon attracts an average of 753 visitors per day. Even a conservative four visitors per car estimate yields a need for 188 additional parking spaces on an average

day, peak weeks that would jump to 304 parking spaces. Though the DEIR has no counts for paddlers using the hand launch dock, it estimates 50. At most paddlers would come 2 to a vehicle, so that is an additional 25 parking spaces required.

**Neither is there any evaluation for parking for fishermen and whale watchers who board at the sport fishing pier or in Basin 3. These numbers should certainly be available from the sport fishing and whale watching commercial vessels.**

***These values bring the parking deficit to OVER 400 to 500 parking spaces short of realistic requirements.***

Another class of pier parking structure users is totally ignored as well: those using the beach just south of the pier. As can be seen in Figure 33, the beach just south of the pier is the most populated beach area in Redondo. Due to the lack of available parking many of these beach goers park in the pier parking structure. The parking assessment does not account for these users.

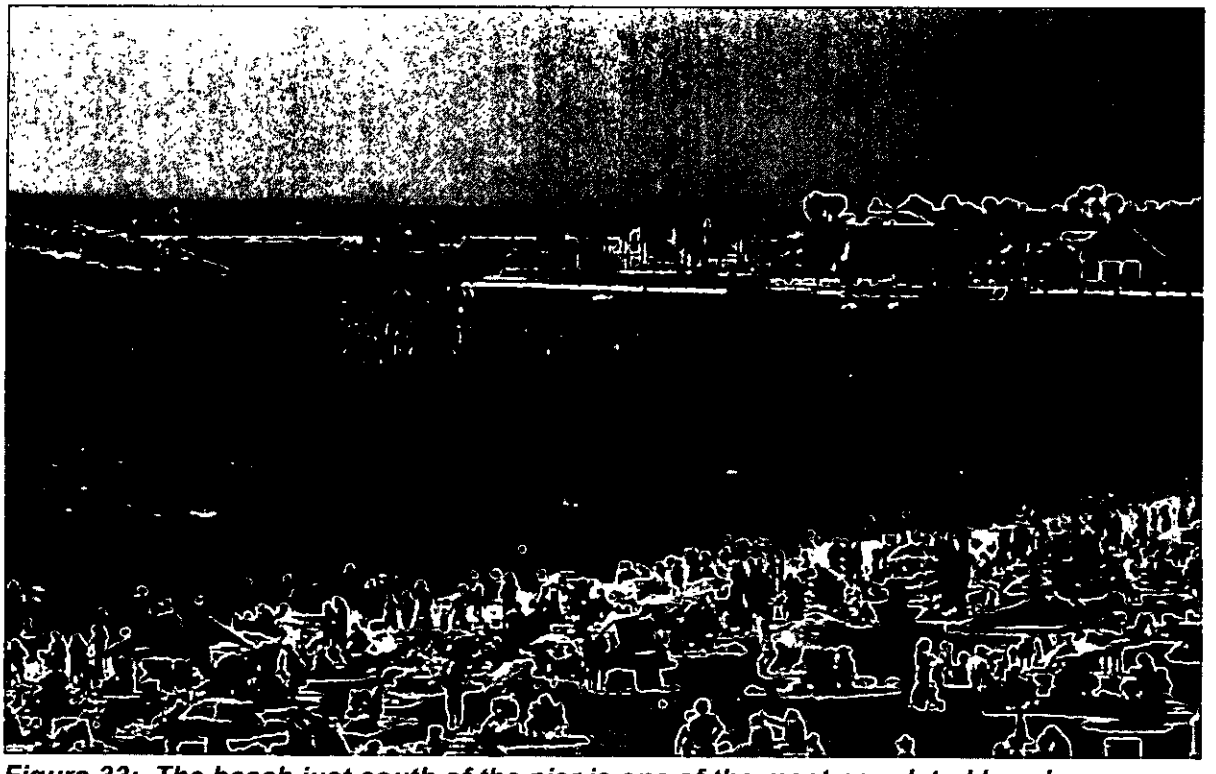

***Figure 33: The beach just south of the pier is one of the most populated beaches on summer weekends and holidays. Due to insufficient parking, many use the pier parking.***

The problem is many of the uses share the same peak utilization times. Weekends and particularly summer weekends and holidays will be peak days for all uses. Today the parking lots are near capacity on summer weekends. Adding over 300,000 sq. ft of additional high parking demand uses while only adding 8% more parking spaces is laughable and will create regular parking overflow conditions. While shoppers and

restaurant goers have plenty of nearby options, those intending to use the harbor for recreation are out of luck.

***The users who will suffer the impacts of the parking deficit the most are the coastal dependent recreational users of the harbor... another example of the commercial non-coastal dependent development negatively impacting coastal dependent recreational uses.***

The parking assessment for the trailer boat ramp assesses 20 trailer parking places and 20 single spaces. As stated previously, the state design guidelines call for a minimum of 20 to 30 trailer spaces per ramp lane. It then proscribes additional single parking for guests, ADA compliant parking, and parking for wash-down. **For the pent up need in our part of the coastline, 20 trailer spots is insufficient.**

Finally, the DEIR traffic analysis calls for eliminating parking spaces on Herondo Drive to mitigate traffic impacts of the development. However, it reserves replacement of those parking spaces to some undefined future. The replacement parking should be identified in the DEIR so that the people can evaluate the real impacts of the lost of this popular parking so close to the beach and the coastal bike path. ***The DEIR is deficient in not defining this replacement parking.***

***When all these exclusions are viewed in totality, it becomes clear, the lack of parking becomes a limiting factor artificially limiting access to coastal dependent recreational uses of the harbor, Seaside Lagoon Park, piers and beach in the project area. This is a blatant violation of the Coastal Act as described in the Land Use section.***

### 7.1.2. Parking configuration

As discussed repeatedly in the recreational assessment, the consolidation of parking in the harbor area to a vertical parking structure is a deterrent to recreational uses in the harbor.

When one studies the parking analysis and square footages of the different parking structures in the project, it becomes apparent that current parking in the pier area was forced into the harbor area to accommodate the hotel and commercial development on the westward side of the pier area parking structure. Once again, this is solid evidence that the project prioritizes the commercial development over the coastal dependent recreational uses that already exist in the harbor today.

While the harbor area does have about 100 surface level parking spots, the need of recreational boaters who lease a slip, of the users of the Seaside Lagoon, of fishermen using the sport fishing pier and the sport fishing boats, and paddlers launching from the Seaside Lagoon area would demand more than this number of surface level parking spots on their own. The plan does NOT reserve these spots for these users anyway.

Thus these recreational users would be forced to fight for parking in parking structures and must traverse through the parking structures themselves with all their equipment, gear, kids, etc - in most cases they will not be able to fit their gear and equipment into the parking structure elevators. Then once they trek through the active traffic in the parking structure they must negotiate through shopping and restaurant areas, cross the active new street cutting through the harbor, across more shopping and restaurants to finally reach their intended recreation. There is very good reason marinas and harbors have ample, nearby surface level parking. While parking structures are fine for shopping centers (although data supports that most shoppers dislike parking structures) it is a major deterrent for those who would have to lug kayaks, SUP's, fishing gear, boating supplies and their family through the parking structure and development.

Indeed, the configuration is hazardous as it exposes the risk of vehicle and equipment damage; physical injuries from carrying heavy equipment so far, hitting a pedestrian with a kayak or SUP, and the risk of crossing an active street while visibility is impeded from carrying all the gear.

***The parking configuration is a real and significant negative deterrent to coastal dependent uses that exist today in the harbor area.***

### 7.1.3. Private parking impacts

The project turns public parking into private parking. This commonly results in preferential treatment of users willing to pay more through valet parking. Valet parking would increase the accessibility impacts of those who use the pier and nearby beach for recreational uses including swimming and wading at the beach and fishing from the pier by favoring more wealthy patrons of the commercial development. Likewise, there is no discussion as to whether any of this parking would be set aside for the exclusive use of hotel guests. Typically, a hotel operator would not want their patrons to have to hunt for limited parking at one of three parking structures spread across the entire project. Allocating a significant portion of the pier parking structure to hotel uses would represent preferential treatment at the expense of those who use the parking structure to park for recreation on the pier and nearby beach.

## 7.2. Traffic assessment

### 7.2.1. Blatant flaws in the approach and analysis

HCM/ICU intersection assessments assume traffic free flows into the intersection in question and is not impeded by conditions downstream of the intersection.

> *"The automobile methodology does not explicitly account for the effect of the following conditions on intersection operation:*
>
> - *Turn bay overflow; ...*
> - *Demand starvation due to a closely spaced upstream intersection;*
> - *Queue spillback into the subject intersection from downstream intersection;*

- *Queue spillback from the subject intersection into an upstream intersection;...*
- *Through lane (or lanes)added just just upstream or dropped just downstream if the intersection; and*
- *Storage of shared-lane left-turning vehicles within the intersection to permit bypass by through vehicles in the same lane."*[28]

All of these conditions exist throughout the streets supporting traffic flow to, from and through, this proposed project. When interviewed at a City DEIR meeting, the consultant admitted that the city required only the basic analysis. In fact, the traffic counts do not record turn lane overflows, through lane traffic blockages, downstream flow impediments... all conditions that would be the worse at peak traffic hours.

***This alone renders the traffic assessments provided in the DEIR worthless.***

### 7.2.2. Harbor Drive Configuration

While the Bike Track project along Harbor Drive is a great upgrade for bicyclists, it creates significant traffic capacity constraints that are not accounted for in the DEIR analysis.

**Sharrows**, road markings that encourage bicyclists to ride in the middle of a traffic lane, now exist on the through lanes of Harbor Drive and on one lane in each direction of Hermosa Avenue. Studies in Copenhagen indicate the speed of the average cyclist is 9.6 MPH. **The DEIR traffic analysis does not account for this drop in hourly lane capacity.**

**Short Turn Queues for road intersections -** The reconfiguration of Harbor Drive has resulted in extremely short right turn queues for road intersections... optimistically most can store only 2-3 cars. And of course any trailer-vehicle combination would limit the storage capacity to one vehicle. During peak hours these turn queues already overflow into the south bound through lane of Harbor Drive blocking through traffic. For example, hourly class schedules at The Bay Club cause an inflow of traffic at Marina Drive during peak evening rush hour. Incoming members block through traffic waiting for the light. Right turn on red is prohibited due to the bike track traffic in both directions which also tends to peak on weekdays during rush hours. **The traffic study does not account for these blockages of the through lane.**

**Zero right turn queue storage for driveway entrances -** There are currently seven driveways on the west side of Harbor Drive in the project area. Figure 34 shows a typical driveway entrance. None of these driveways have any southbound, right turn lane. A single car turning into these driveways blocks traffic. The two way traffic on the

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[28] HCM 2010, Highway Capacity Manual, Volume 3: Interrupted Flow; Transportation Research Board of the National Academies; pages 18-29 and 18-30.

bike path combined with pedestrian traffic create this situation regularly particularly at rush hour and on weekends. The busy entrances to Cheesecake Factory and the parking lot entrance near Capt. Kidd's suffer from this condition frequently. **The traffic analysis does not account for these conditions that impede the traffic capacity of the through lanes.**

***Figure 34: No turn queue for southbound traffic into Tarsans Driveway. Typical of all driveways along Harbor Drive. Note sharrow behind vehicle, narrow lane, and close proximity to parking. All these conditions limit capacity. Also note how the driver favors driving on the line for the center turn lane. This is typical in this section of Harbor Drive due to the narrowness of the lane.***

**Conflicts for use of the center turn lane -** The short distances between driveways and intersections creates conflicts for the use of the center turn lane. For example, the left turn queue to turn onto Beryl Drive heading east often blocks the ability for north bound Harbor Drive Traffic to turn into the marina parking lot driveway. Drivers wanting to make this turn must then stop in the northbound lane until the traffic clears the southbound left turn queue.

**Northbound driveway entry challenges** - The challenge of northbound vehicles trying to cross southbound traffic, bi-directional bicycle lane traffic and pedestrian traffic

results in frustrated drivers pulling across the southbound lane, blocking traffic until they get a gap in bicycle and pedestrian traffic. This type of back up occurs frequently at the parking lot entrance near Capt. Kidd's.

**Conflicts for traffic turning left when exiting driveways** - Again, drivers frustrated by the long wait to get a perfect gap in pedestrian, two way bicycle and two way vehicle traffic will often pull into the southbound lane of Harbor Drive blocking traffic until they can fit into a gap in north bound traffic.

**These conditions not only impede the real traffic capacity of Harbor Drive, but they also represent a real safety hazard.** Intensifying traffic demand in this area without addressing these fundamental issues only exacerbates both the risk and and overall capacity of the roadway.

**The new parking structure and 10x increase in harbor development will dramatically increase the traffic demand in this critically constrained area. The driveway for the new parking structure will create a new major impact unless the driveway is signalized. Even if signalized the short road segment storage capacity between the new driveway and the Beryl/Portofino Way intersection will only further impede the capacity in this is area.** ***The traffic analysis contains zero assessment for these conditions.***

### 7.2.3. Short Road Segment Impacts

Key ingress and egress roads from this development suffer from critically short road segments. During heavy demand, these segments fill to capacity and prevent more vehicles from entering the segment during their green light. This often results in residual vehicles stuck blocking through lanes until the downstream signal changes to let the short segment clear. These short segments occur on Beryl between Catalina and Harbor Drive, Torrance Blvd between Catalina and Broadway and between Broadway and PCH, and on northbound PCH between Catalina and 190th/Herondo. Figure 35 shows an example of a short road section that limits intersection capacity. ***While these overflowing intersection conditions are the definition of gridlock, the traffic analysis does not account for these conditions in either the upstream or downstream intersections impacted. This leads to an artificially inflated LOS grade for an intersection.***

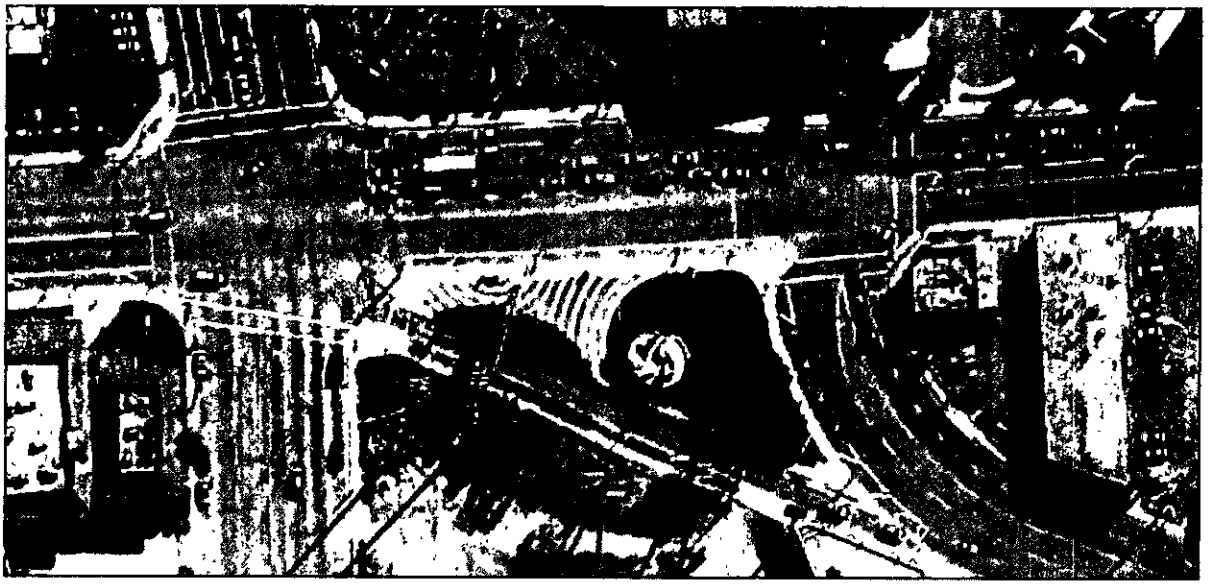

***Figure 35: Example of short road segment at PCH and Herondo/190th. Note segment storage overflow into intersection of Catalina and PCH. These conditions are not reflected in the traffic analysis.***

### 7.2.4. Summary of real conditions that were not factored into the traffic analysis

Figure 36 summarizes the real road conditions that negatively impact traffic capacity of the project area but that were not accounted for in the traffic analysis.

| Driving along | Entering | Direction | Turn Movement | Queue Storage | Limitations |
|---|---|---|---|---|---|
| Harbor Drive | Yacht Club Way | South Bound | Right Hand Turn Lane | 2 - 3 cars | Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Tarsans/Boatyard Drive Way | South Bound | Right Turn Main Lane | 0 cars | Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Marina Way | South Bound | Right Hand Turn Lane | 2-3 cars | Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |

| | | | | | |
|---|---|---|---|---|---|
| Harbor Drive | Port Royal Marina Parking | South Bound | Right Turn Main Lane | 0 cars | Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Shade Hotel Entrance | South Bound | Right Turn Main Lane | 0 cars | Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Cheesecake Factory Entrance | South Bound | Right Turn Main Lane | 0 cars | Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Port Royal Marina Parking | South Bound | Right Turn Main Lane | 0 cars | Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ ped traffic |
| Harbor Drive | Portofino Way | South Bound | Right Hand Turn Lane | 2-3 cars, 1 car/trailer | Extremely Narrow Lane, wide turn needed for vehicles with trailers Frequent turn lane overflows blocking through traffic |
| Harbor Drive | New Parking Structure Entrance/Exit | South Bound | Not Available | Not Available | If not signalized, similar limitations to other non signalized intersections |
| Harbor Drive | Southern Parking Entrance | South Bound | Right Turn Main Lane | 0 | **Significant blockages due to left turns from northbound lane/ Pacific often block southbound lane waiting for bike/ped traffic,** any right turns block through traffic waiting for bikes/peds |
| Harbor Drive | Port Royal Marina Parking | North bound | Left Hand Turn Lane | Variable | On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl, dangerous negotiating southbound vehicle and bikes and peds from both directions, **frequent stops across south bound lane** |

| | | | | | |
|---|---|---|---|---|---|
| Harbor Drive | Cheesecake Factory Entrance | North bound | Left Hand Turn Lane | Variable | Dangerous negotiating southbound vehicle and bikes and peds from both directions, **frequent stops across southbound lane** |
| Harbor Drive | Shade Hotel Entrance | North bound | Left Hand Turn Lane | Variable | Dangerous negotiating southbound vehicle and bikes and peds from both directions, **frequent stops across southbound lane** |
| Harbor Drive | Port Royal Marina Parking | North bound | Left Hand Turn Lane | Variable | Dangerous negotiating southbound vehicle and bikes and peds from both directions, **frequent stops across southbound lane** |
| Harbor Drive | Tarsans/Boatyard Drive Way | North bound | Left Hand Turn Lane | Variable | Dangerous negotiating southbound vehicle and bikes and peds from both directions, **frequent stops across southbound lane** |
| Harbor Drive | Beryl St | South Bound | Left Hand Turn Lane | Variable | On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl |
| Beryl Drive | Catalina | East Bound | Segment | 18 cars through, 2- 3 vehicles left and right onto Catalina, conflicts for center lane turns into hotel and Salvation Army | Heavy conflict with center turn lane for Redondo Hotel and Salvation Army, **Total segment length less than 400 feet,** Can only hold 18 cars in through lane (less with trailers), 2 to 3 cars in either turn lane. Entire segment fills on busy days. |

| | | | | | |
|---|---|---|---|---|---|
| Beryl Drive | Harbor | West bound | Segment | 18 cars through,18 vehicles right onto Harbor, conflicts for center lane turns left onto harbor, | Heavy conflict with center turn lane for Redondo Hotel and Salvation Army, **Total segment length less than 400 feet,** Can only hold 18 cars in through lane (less with trailers) and right turn lane, 2 to 3 cars in left turn lane. Entire segment fills on busy days. Frequently blocks all access to Salvation Army and Redondo Hotel from eastbound turns |
| Catalina | Pacific | North bound | Left Hand Turn Lane | 3- 4 cars, 2 vehicles with trailers | **Extremely dangerous turn across two lanes of Catalina south Bound, short distance to intersection adds risk** |
| Pacific | Catalina | East Bound | Right Turn Only | NA | **Extremely dangerous stop unsignalized intersection, short distance and poor sight makes turn risky, frequent illegal left turn lanes by tourists who did not know it was right turn only** |
| Torrance Blvd | Catalina to Broadway | East Bound | Segment | 2-3 cars left and right turn | TOTAL SEGMENT ONLY 300 FEET ONLY - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light |
| Torrance Blvd | Broadway to PCH | East Bound | Segment | 5 cars left turn | TOTAL SEGMENT ONLY 300 FEET ONLY - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light. Vehicles desiring to go north on PCH often get blocked out from left turn lane due to through queue blocking entire turn lane - causes full signal cycle delay. Left turn lane can overflow onto through lane blocking through traffic. |

| | | | | | |
|---|---|---|---|---|---|
| PCH | Catalina to 190th | South Bound | Segment | 27 cars thru to north, 8 east turn | Choke point when PCH goes to two lanes on northbound side |

***Figure 36: Significant road segments, intersections, and driveway impediments ignored for in the DEIR traffic assessment. DEIR assessment artificially optimistic.***

### 7.2.5. No weekend analysis

The vast majority of land uses proposed in the project and existing today generate their peak traffic on the weekends. ITE Trip Generation Tables show dramatic increases for movie theaters, retail and restaurant uses on weekends - up to a 51% increase in trips for Saturday Peak hour (see Figure 37). Recreational boating, paddling, sportfishing, Seaside Lagoon attendance, and whale watching uses all increase on the weekend. ***The fact that the traffic analysis does not include weekend traffic counts and assessments represents a huge hole in the traffic assessment.***

| Comparison of weekday to weekend trip generation | | | | | | | |
|---|---|---|---|---|---|---|---|
| ITE Land Use | Land Use Description | Size | Units | TOTAL WEEKDAY (DEIR) | TOTAL SATURDAY* | WEEKDAY PEAK (DEIR) | SATURDAY PEAK* |
| 820 | Retail | 97 | KSF | 6,658 | 9,064 | 587 | 857 |
| 444 | Theater | 700 | seats | 1,260 | 1,568 | 49 | 322 |
| 931 | Quality Restaurant | 128 | KSF | 11,514 | 12,032 | 959 | 1,385 |
| 932 | Hi Turn Restaurant | 45 | KSF | 5,722 | 7,127 | 443 | 633 |
| 310 | Hotel | 130 | rooms | 1,062 | 1,365 | 78 | 113 |
| 710 | Office | 60 | KSF | 662 | 148 | 89 | 26 |
| | | | **TOTAL:** | **26,878** | **31,303** | **2,205** | **3,336** |
| **Percentage increase from weekday DEIR analysis:** | | | | | **16%** | | **51%** |
| *All values derived from ITE Trip Generation Tables, 9th Edition | | | | | | | |

***Figure 37: Comparison of weekday trip generation to weekend trip generation shows dramatic increases in traffic at a time PCH in Hermosa is constrained to two lanes in each direction***

Concurrent with this peak traffic generation, bicycle and pedestrian traffic will peak as well. And traffic constraints of the main arterial, PCH, through Hermosa Beach are impacted as the arterial is constrained to two lanes in each direction all day on weekends.

Clearly, the DEIR is deficient in not evaluating weekend traffic generation and impacts of this huge development.

### 7.2.6. Cumulative impacts

As mentioned in a previous section, the traffic analysis ignores known projects that would have a significant cumulative impact on traffic. These include:

- The new General Plan Update for Hermosa Beach that adds over 600,000 sq. ft of commercial development in close proximity to the project
- The Sketcher Headquarters Expansion
- The AES property reuse - Measure B should be used as an upper limit for assessment

Others have been noted as well in the Cumulative Impacts section. For example, the reconfiguration of Shade Hotel requires offsite parking and valeting of cars. This impact has not been assessed.

**The traffic study should be reaccomplished accounting for these known upcoming projects.**

### 7.2.7. Traffic Impact Study Comments

While the previous sections describe blatant shortcomings of the traffic analysis that render its results worthless and artificially optimistic, we will include some other flaws in our assessment of the traffic impact study.

**7.2.7.1.** Table 8 existing V/C values do not correlate with those of Table 6.

**7.2.7.2.** The study states it relies on Shade Hotel traffic analyses. The configuration of Shade Hotel parking has changed in a way that will impact traffic significantly, particularly in the Portofino/Harbor Drive intersection. The new configuration has Shade Hotel valeting cars back and forth between the hotel and a new parking lot off of Portofino Way on the former Triton Oil site. This will effectively double traffic and increase turn traffic onto and out of Portofino Way.

**7.2.7.3.** The study states it uses current pedestrian and bicycle traffic counts. The development should dramatically increase both types of traffic especially since the traffic study also reduces traffic trips due to the mixed use nature of the development.

**7.2.7.4.** The trip length assessment does not make sense. It assesses that the trip lengths will be relatively short. The City says it the current development underperforms because it is not getting enough patronage, and their stated intent is to attract customers from nearby cities. It cites employment statistics from a relatively short radius as the justification for short trips. If this number of local employees are available today, the harbor should be more successful without the dramatic increase in development proposed by the project. For the development to be successful at this scale, it will have to draw customers from a much wider draw area and this would result in increased trip lengths.

**7.2.7.5.** Analyzing the impact of the reconnection of Pacific Ave on intersection utilization, it appears that the heaviest use of the new street would be to service through traffic from the north side of the project. According to Figure 2 in the Traffic study, 100% of Harbor Drive Southbound traffic that currently turns east on Beryl diverts to going straight through to the south.

This new connection is advertised as being required to connect the two sides of the project, but the traffic allocation model does not reflect that at all. The new road generates significant and unavoidable noise impacts. If the road is largely used for through traffic, then the impact can be mitigated by deleting the road.

**Providing a new route for cut through traffic is not desirable. It creates unnecessary impacts and just moves congestion problems. The results of the traffic modeling show we should delete the new road connection.**

**7.2.7.6.** The traffic volumes for Harbor Dr/Pacific Ave appear twice (20 and 35) and the drawn configuration, reported counts and future projections make no sense. In intersection 20, Harbor Drive and Pacific are not a cross intersection. The peak hour existing volumes for the turn movements make no sense. It would have us believe that the south bound Harbor Drive traffic makes 134 evening turns onto the non existent westbound Pacific Drive. Intersection 35 shows a western leg of Pacific Drive with a T intersection to Harbor Drive... this does not exist. If the intersection is meant to be the Catalina and Pacific Ave intersection, the traffic counts seem low for through traffic on Catalina (0 in the southerly direction).

**7.2.7.7. Trip Generation**

**The methodology for determining new trip generation is fundamentally flawed.** It takes ***some*** of the existing uses and calculates their trip generation from ITE Trip generation tables. It then takes the project trip generation for some uses, subtracts the future from the current and uses that number to base the rest of the future analysis on. ***This approach understates the traffic growth.***

The City has repeatedly complained that our harbor and pier are underperforming. If they are underperforming, they should be generating fewer trips than successful uses would. Using trip generation tables to characterize current traffic would then over predict current traffic. Subtracting the over predicted current traffic from the future traffic projection would result in artificially lowering the expected traffic growth.

The proper way to make this assessment is to bound the current project area key intersections. Use current traffic counts for the current traffic. The future traffic generation should be calculated for ***all*** the uses that will reside in that same area after project completion. That results in a realistic assessment of traffic impact.

***The current methodology understates traffic growth and that then is perpetuated and magnified in the intersection capacity utilization and LOS analyses resulting in under predicted traffic impacts.***

### 7.2.7.8. Reasonableness Check - Reconnection of Harbor Drive to Torrance Blvd.

The model appears to have some basic flaws. Analyzing one intersection for example, Harbor/Portofino (intersection number 15), highlights those flaws. The intersection is a key access point to the new 161,000 sq ft parking structure and about 100 surface level parking spots for the north side of the project, plus the traffic for the new boat ramp, plus the traffic for the valet parking for Shade Hotel entering and leaving the new parking lot on the north side of Portofino Way (the former Triton Oil site). This area of the harbor, according to the DEIR will go from 48,399 sq ft of primarily commercial development on the ground today to a whopping 290,297 sq ft of commercial development. That is a 600% growth in the development. And that is going from what the city describes as poor performing current development. Yet this intersection does NOT see the same relative growth in trips into this area of the harbor.

DEIR Figure 4 shows the new traffic generated by the project allocated to this intersection. There is a significant amount of traffic going down Portofino Way from southbound Harbor Drive and westbound Beryl. Yet despite 6x the growth in harbor development, the new parking structure and the new boat ramp, not a single new vehicle trip turns into Portofino Way from northbound Harbor Drive. From this assessment, reconnecting Harbor Drive to Torrance Blvd appears to have little utility from a project. Likewise, only 66 additional vehicle proceed straight through the intersection toward the pier. ***This does not seem to justify the great expense and unavoidable impacts of the new Pacific Ave reconnection.***

This situation is exacerbated when looking at DEIR Figure 8 for the same intersection. While the project only generates 66 new vehicle trips through Harbor to the south (figure 4), the through trips of the project plus cumulative impacts jumps to 452 vehicles (Figure 8) from 186 vehicles today (DEIR Figure 1). **This shows that the vast majority (75%) of the increased traffic, 200 new trips, southbound through this intersection are purely through trips.**

**This conclusion is further substantiated by comparing the westward traffic counts of Beryl at Harbor.** Although the Harbor area has 6x the growth, the total west flow for all movements only goes up by 4 vehicles. Examining the turn movements shows a dramatic drop in the northbound turns from Beryl. And this drop is offset by a dramatic rise in through traffic from south to north through the intersection. At the same time the turn traffic into Portofino way represent no gain from current turn traffic, just 11 vehicle. **Again, analysis shows that the new connection primarily serves through traffic.**

***The reconnection of Harbor to Torrance has just made the harbor a new arterial south. This negatively impacts recreational uses of the harbor by impact access.***

***Again, the minor benefit (66 cars) to the project does not justify the dramatic increase in harbor area traffic and the significant and unavoidable noise impacts to Basin 3, Hotel guests and the boaters in Basin 3.***

But that is not the only oddity when analyzing this intersection. With the 600% increase in development and the primary access to the new parking structure, Shade Hotel parking lot, new boat ramp, and the surface level parking in the harbor area of the project being off of Portofino way, the traffic entering and leaving Portofino Way as assessed in DEIR Figure 8, shows an unbelievably low increase in trips.

| Movement | Current Traffic (DEIR Figure 1) | Traffic with project and cumulative impacts (Figure 8) | Increase |
|---|---|---|---|
| West on Portofino from southbound Harbor | 39 | 116 | 2 9x |
| West on Portofino across Harbor Blvd | 113 | 203 | 1.8x |
| East on Beryl across Harbor Dr | 118 | 271 | 2.3x |
| West of Portofino from northbound Harbor Dr | 11 | 11 | 0x |

***The low multiplier in trips into and out of Portofino does not make sense in light of the dramatic increase in development and uses in this part of the harbor.***

And that is only further exacerbated by another factor that would increase traffic....increased internal trips caused when the surface parking is full. This can be seen at any mall. Most drivers want to park as close as possible to their end destination. And certainly, the vast majority of guests will want to avoid the parking structure. This will drive visitors to first drive through the surface level parking along the new internal street prior to trying the parking structure. In most malls, this is not a big traffic impact on key access roads, cars will just circle within the parking lot and/or parking structure without reentering a street. Here, when the few surface parking spots are full, a visitor must leave the internal street and return via Harbor Drive northbound to return to the parking structure crossing southbound Harbor Drive traffic. This obvious, predictable, and inevitable traffic is not incorporated into the model results.

***A basic practice by engineers using models is to validate the model against common sense. Here the model results do not stand up to simple common sense assessment. It is obvious that even beyond the under predicted trip increase, the trip and turning movement allocations of the model under state the realistic impacts of this project. The traffic analysis and modeling needs to be reaccomplished.***

### 7.2.7.9. Comparison to Related Traffic Assessments

The 2009 Traffic Element Assessment specifically modeled the Measure G zoning that resulted in the current project. The assessment of 2030 traffic with this added zoning is dramatically different that that assessed here. Figure 38 shows this assessment. It concludes much more serious impacts on intersections for which this project defines no mitigations. The rippling affect of the errors of the DEIR assessment become apparent in this comparison.

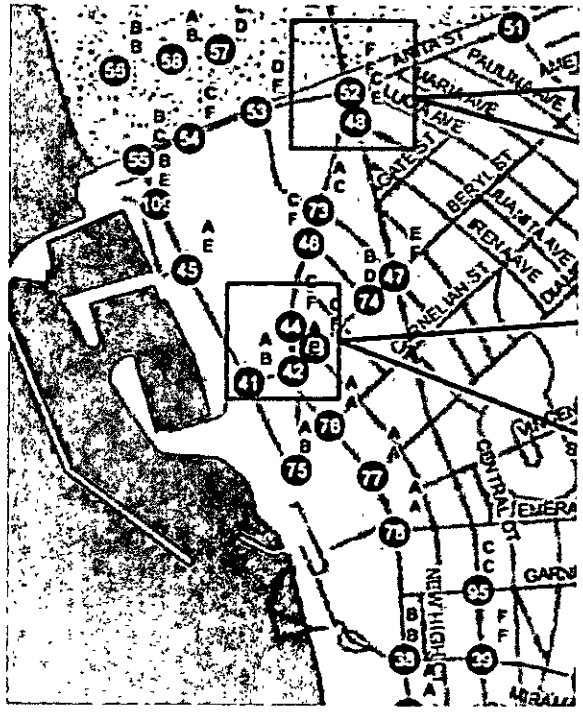


**Figure 38: Circulation Element traffic analysis shows much greater impacts**[29]

When Measure G zoning was put on the ballot, the city did a much more detailed and formal assessment and again even with proposed mitigations, the results are much worse than the DEIR assesses. See Figure 39.

[29] City of Redondo Beach Circulation Element, 2030 Traffic Assessment, November 2009

**TABLE T20**
**AS-BUILT PLUS PROJECT CONDITIONS WITH MITIGATIONS**
**INTERSECTION LEVELS OF SERVICE AND IMPACT ANALYSIS**
**(ICU METHODOLOGY)**

| Intersection | As-Built Conditions | | | | As-Built plus Project Conditions with Mitigations | | | | As-Built plus Project Conditions with Mitigations Impact | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | | AM Peak Hour | | PM Peak Hour | |
| | LOS | V/C | LOS | V/C | LOS | V/C | LOS | V/C | Change in V/C | Sig Impact | Change in V/C | Sig Impact |
| 1. PCH & Anita/Hermosa Street | E | 0.924 | E | 0.917 | E | 0.951 | F | 1.153 | 0.027 | Yes | 0.236 | Yes |
| 2. PCH & Catalina Avenue | B | 0.673 | E | 0.931 | B | 0.689 | E | 0.999 | 0.016 | No | 0.068 | Yes |
| 4. PCH & Beryl Street | D | 0.856 | E | 0.953 | E | 0.901 | F | 1.038 | 0.045 | Yes | 0.085 | Yes |
| 5. Catalina Avenue & Beryl Street | A | 0.390 | B | 0.636 | A | 0.550 | E | 0.967 | 0.160 | No | 0.331 | Yes |
| 7. PCH & Torrance Boulevard | D | 0.893 | E | 0.907 | D | 0.873 | E | 0.909 | -0.020 | No | 0.002 | Yes |

Note: *Bold italics indicate ICU improved by mitigation measures*

***Figure 39: Measure G specific traffic assessment. This further supports that the DEIR analysis is flawed significantly.***[30]

### 7.2.7.10. Circulation Safety Assessment

**Public safety response** - The DEIR highlights that the reconnection of Pier and Harbor would facilitate faster public safety response times. The enhancement is overblown. The fire department is represented on both sides of the development area. The fire station at Pearl and Broadway is in close proximity to the pier and hotel area down Torrance Blvd and using access ways to the top level Hotel parking. There is only one more intersection down Torrance Blvd to reach the harbor area. There are also fire and lifeguard personnel on Mole C in close proximity from the harbor side.

The police patrol an area on either side of the development and the police station is on Diamond very close to the harbor. The pier side currently maintains a police station and the project plan calls for a replacement for this station.

So there is little time impact from the lack of connectivity between the two streets currently and the situation would not change significantly with the project, were the project to exclude the reconnection.

***The reconnection may actually impede response time.*** The new Pacific Avenue does not appear to have any shoulder. And it has no center turn lane. It is often bounded by development and walls on both sides. With heavy through traffic in both

[30] Measure G Supplemental Ballot Information, City of Redondo Beach; November 2, 2010

directions and a stop sign and a bike path crossing at each end, emergency response trying to use this route could easily be stuck while the traffic clears. There is no way to use a center turn lane to split the traffic, a shoulder for drivers to pull over, and no way to turn around or exit the narrow roadway once you are in it.

# 8. Biological Impacts

Redondo Beach's Local Coastal Program includes specific restrictions on trimming or removing trees with nesting birds that represent protected species. Multiple local bird watchers have reported violations of these restrictions, but Redondo seems to ignore the reports.

Here is a published report that appeared as a letter to the editor in The Beach Reporter , July 15th, 2015:

> *Tree trimming troubles*
>
> *It is a violation of state and federal law to trim or cut trees or shrubs while night herons and great blue herons are nesting, but there are regular violations of these laws in the South Bay. Two years ago, palms on the Esplanade were "trimmed" drastically after the night herons had nested. Young herons not yet able to fly fell to the ground and were killed by cars or dogs within a day or two. A few herons returned to the Esplanade last year. More arrived this year. I am concerned that the "trimming" will begin again soon.*
>
> *There has also been illegal trimming of palms in Portofino and King Harbor while the great blue herons are nesting. After the first trimming in Portofino this year, one pair of herons relocated to palms closer to the ocean. After a few weeks, these palms and only these palms were trimmed. It is clear then that the herons were being targeted. Last week, in King Harbor, three adjacent palms in which a pair of great blue herons was nesting were cut drastically.*
>
> *So who trimmed the trees? The city of Redondo Beach? King Harbor? The homeowners on the Esplanade? It would be good to know so they can be advised not to do so again during nesting season. If the problem is bird poop on cars, then put up signs advising drivers that they may want to use car covers as coastal birds nest here.*
>
> *Elizabeth Courtenay*
> *Manhattan Beach*

Given the observed track record, local bird enthusiasts do not trust the city or CenterCal to protect these birds that are a true asset of our harbor area. **The DEIR should detail how the City and CenterCal will survey, document, and report the trees to be**

**impacted by construction prior to construction and during construction as nesting season arises.**

# 9. DEIR Alternatives Assessment

The combination of land use alternatives combined with the options for boat ramp locations creates too many combinations and permutations to be adequately assessed.

Looking at just the basic land use alternatives, the alternatives assessment is flawed due to the faulty impact assessment of the DEIR. Once the impact assessments of the proposed project are reasonably and more accurately represented, the comparison of alternatives should be reaccomplished.

The Project Objectives are stated in such a way that more reasonable and balanced alternative is automatically ruled out. The Project Objectives should be restated and the primary objective should be to truly increase and enhance coastal dependent recreational and commercial uses of our harbor. Anything else should be a means to that end.

Waterfront revitalization and increased revenue streams for the city can be accomplished without overdeveloping this relatively small area of the Redondo waterfront. Infrastructure maintenance and refurbishment funding tools and mechanisms have not been fully explored and vetted. Combining smaller changes over a broader area can accomplish the same objectives without the negative impacts and risk on our harbor and its coastal dependent uses.

# 10. Summary, Recommendations, and Conclusions

## 10.1. Summary

The analysis of the DEIR reveals the following:

- a large number of impacts to coastal dependent commercial and recreational uses that were understated or missed by the DEIR
- a large number of combinations and permutations of options and alternatives that are not fully vetted or explained
- significant impacts of some alternatives are not assessed and fall outside the defined project area
- several key analyses are flawed and/or missing, many conclusions are drawn without substantiation and do not stand up to scrutiny

## 10.2. Recommended Alternatives

This project is broken. The city and developer are trying to pack too much development into too small a site. When the impacts are reasonably evaluated, it becomes obvious.

With the AES site available for redevelopment and the lease renewal for King Harbor Marina nearing, an integrated plan for the entire waterfront should be developed including the entire harbor and pier area, the AES property, the power line right of way, and properties bordering AES and the right of way (the dirt farm, bank, mini storage, etc.)

Spreading revenue generating uses across this entire area could fund the infrastructure improvements without all the negative impacts in the harbor.

However, given that city has repeatedly refused to take this logical and most efficient, effective and least impactful path, we submit several Harbor Pier alternatives for evaluation. The basic objective of these alternatives is to revitalize the waterfront and expanding and balancing recreational and commercial uses with the negative impacts.

### 10.2.1. Alternative A

- Infrastructure refurbishment and upgrades, no reconnection of Pacific
- Pier and current Parking structure similar - repurpose octagonal pad for public open space or institution (aquarium, museum)
- Harbor
  - Eliminate parking structure
  - Expand park to Joes Crabshack site
  - Explore non-profit for Newport Aquatic Center (NAC)- like facility
  - Leave Seaside Lagoon disconnected explore alternative water features (pool)
  - Reduce development increase to 50,000 sq. ft, revamp International Boardwalk
  - Construct 2 lane boat ramp on Mole D with 40 parking spots
- Refurbish sport fishing pier
- Bring in tall ship
- Scrap the bridge and refurbish Basin 3 marina

### 10.2.2.Alternative B

- Infrastructure refurbishment and upgrades, no reconnection of Pacific
- Pier and current Parking structure similar - repurpose octagonal pad for public open space or institution (aquarium, museum)
- Harbor
  - Eliminate parking structure
  - Expand park to Joes Crabshack site
  - Explore non-profit for Newport Aquatic Center (NAC)- like facility
  - Leave Seaside Lagoon disconnected explore alternative water features (pool)
  - Reduce development increase to 50,000 sq. ft, revamp International Boardwalk
- Refurbish sport fishing pier
- Bring in tall ship
- Construct 2 lane boat ramp on Mole A with 40 parking spots
- Move KHYC to Mole B (if parking for other uses not impacted)
  - Move Moonstone park to Joe's Crabshack site and connect with expanded Seaside Lagoon

## 10.2. Conclusions

- The project definition is not mature enough for a Project Level DEIR

- The DEIR shows obvious bias toward the development

- The DEIR analysis is significantly flawed and much of it needs to be reaccomplished with better project maturity and definition

- The proposed project violates the Coastal Act and Redondo General Plan and Local Coastal Program

- The project represents significant impacts to existing coastal dependent recreational and commercial uses of the harbor

- The project represents megalithic development on the waterfront. The harbor takes an unfair brunt of the development as the development is increased by 1000%

- The reconnection of Torrance Blvd and Harbor Drive primarily serves through traffic while causing unavoidable and significant noise impacts to existing residential development, hotel guests and boaters in Basin 3.

- The proposed land swap with the State Lands Commission is not in the best interest of the People of California

- The project and the alternatives prioritize commercial development at the expense of existing coastal dependent recreational and commercial uses of the harbor

The wide implications of the project alternatives (particularly the boat ramp alternatives), the demonstrated significant impacts on coastal dependent harbor uses, the upcoming lease renewal for King Harbor Marina, and the change in AES property status all for the City to go back to the drawing board and develop an integrated plan for the entire waterfront.

This would allow the opportunity to define an outcome that achieves the city's revenue goals while distributing impacts so that the coastal dependent uses are not unduly absorbing the substantial impacts of the final project(s).

# APPENDIX A: CITY RESPONSE TO SEASIDE LAGOON PUBLIC RECORDS REQUEST

Public Records Request – Case # 24631

1) Seaside Lagoon visitors broken out by day for the 2015 season.

Response: The City maintains weekly totals for Seaside Lagoon attendance. Attendance for summer 2015 is attached.

2) Does the number provided in the response below include special events, private events, and kid's camps?

Response: Attendance figures for Breakwater Camp at Seaside Lagoon or special and private events are not included in the attendance figure #1. The attendance for 2015 Camp is attached. Attendance figures are not recorded for special or private events at Seaside Lagoon.

3) Please provide a list of the special events, public and private, and kid's camps held at the Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are included in the total provided in the response below.

Response: Attached is the report on 2015 special and private events at Seaside Lagoon. Attendance figures are not recorded or estimated.

**Seaside Lagoon**
**Weekly Attendance Report**
**Summer 2015**

| Week | Weekly Attendance |
|---|---|
| 5/23 – 5/29 | 1,331 |
| 5/30 – 6/5 | 918 |
| 6/6 – 6/12 | 1,659 |
| 6/13 – 6/19 | 3,085 |
| 6/20 – 6/26 | 5,087 |
| 6/27 – 7/3 | 7,970 |
| 7/4 – 7/10 | 8,299 |
| 7/11 – 7/17 | 7,461 |
| 7/18 – 7/24 | 5,516 |
| 7/25 – 7/31 | 8,532 |
| 8/1 – 8/7 | 7,495 |
| 8/8 – 8/14 | 6,917 |
| 8/15 – 8/21 | 6,405 |
| 8/22 – 8/28 | 4,320 |
| 8/29 – 9/4 | 3,878 |
| 9/5 – 9/7 | 3,455 |
| | |
| Total | 81,328 |

# Registration Summary Report

Printed: [illegible]

Activity: Breakwater Day Camp
Registrations, and Withdrawals, and Transfer In, and Transfer Out, and Cancellations

Session: 2015 Spring Registration Session
Courses Suppressed: Yes

Brochure Section:

| | # Reg | # WLD | Transfer In | Transfer Out | Cancellation | Net | Fee | Extra Fee | Total |
|---|---|---|---|---|---|---|---|---|---|
| Camps | | | | | | | | | |
| Breakwater Day Camp (BWDC) | | | | | | | | | |
| Total: Breakwater Day Camp | 563 | 74 | 0 | 0 | 0 | 563 | $96,892.00 | $2,128.00 | $99,020.00 |
| Total: Camps | 563 | 74 | 0 | 0 | 0 | 563 | $96,892.00 | $2,128.00 | $99,020.00 |
| Report Total: | 563 | 74 | 0 | 0 | 0 | 563 | $96,892.00 | $2,128.00 | $99,020.00 |

# Facility Usage Report

Printed: 29 Dec 2015 10:19 AM

Booking Types: Rental/Class Reg/Course/Membership/Visit; Include Subfacilities: Yes
Date from: Thursday, January 01, 2015 — Date to: Thursday, December 31, 2015
Facility: Luau Shelter — Complex: Seaside Lagoon
Facility Option: Facility — Rental Status: Closed/Tent/Tentative

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| **Complex: Seaside Lagoon** | | | | |
| **Facility: Luau Shelter** — Hours Avail: 8760.00 | | | | |
| Date: 05 Mar 2015 | | | | |
| Function: General Rental | 1:00 | $496.46 | $15.48 | $511.94 |
| Total for Date: 05 Mar 2015 | 1:00 | $496.46 | $15.48 | $511.94 |
| Date: 07 May 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $150.00 | $1,050.00 |
| Total for Date: 07 May 2015 | 6:00 | $900.00 | $150.00 | $1,050.00 |
| Date: 10 May 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 10 May 2015 | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 17 May 2015 | | | | |
| Function: Private Party | 7:00 | $500.00 | $0.00 | $500.00 |
| Total for Date: 17 May 2015 | 7:00 | $500.00 | $0.00 | $500.00 |
| Date: 24 May 2015 | | | | |
| Function: General Rental | 5:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 24 May 2015 | 5:00 | $750.00 | $0.00 | $750.00 |
| Date: 25 May 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $112.50 | $1,612.50 |
| Total for Date: 25 May 2015 | 14:00 | $1,500.00 | $112.50 | $1,612.50 |
| Date: 27 May 2015 | | | | |
| Function: General Rental | 5:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 27 May 2015 | 5:00 | $350.00 | $0.00 | $350.00 |
| Date: 28 May 2015 | | | | |
| Function: General Rental | 1:00 | $350.00 | $0.00 | $350.00 |
| Function: General Rental | 1:00 | $4,500.00 | $0.00 | $4,500.00 |
| Total for Date: 28 May 2015 | 2:00 | $4,850.00 | $0.00 | $4,850.00 |
| Date: 29 May 2015 | | | | |
| Function: General Rental | 5:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 29 May 2015 | 5:00 | $350.00 | $0.00 | $350.00 |
| Date: 03 Jun 2015 | | | | |
| Function: General Rental | 1:00 | $189.00 | $0.00 | $189.00 |
| Function: General Rental | 1:00 | $552.00 | $0.00 | $552.00 |
| Total for Date: 03 Jun 2015 | 2:00 | $741.00 | $0.00 | $741.00 |
| Date: 04 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 04 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 08 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Function: General Rental | 8:00 | $1,600.00 | $0.00 | $1,600.00 |

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(Printed: 22 Dec 2015, 10:19 AM)
User: [illegible]

## Facility Usage Report

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Total for Date: 06 Jun 2015 | 12:00 | $2,400.00 | $0.00 | $2,400.00 |
| Date: 07 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 07 Jun 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 08 Jun 2015 | | | | |
| Function: General Rental | 4:00 | $180.00 | $0.00 | $180.00 |
| Total for Date: 08 Jun 2015 | 4:00 | $180.00 | $0.00 | $180.00 |
| Date: 09 Jun 2015 | | | | |
| Function: General Rental | 8:00 | $550.00 | $0.00 | $550.00 |
| Total for Date: 09 Jun 2015 | 8:00 | $550.00 | $0.00 | $550.00 |
| Date: 10 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $375.00 | $0.00 | $375.00 |
| Total for Date: 10 Jun 2015 | 6:00 | $375.00 | $0.00 | $375.00 |
| Date: 11 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 11 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 12 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $375.00 | $0.00 | $375.00 |
| Function: General Rental | 4:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 12 Jun 2015 | 10:00 | $1,275.00 | $0.00 | $1,275.00 |
| Date: 13 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 5:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 13 Jun 2015 | 11:00 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 14 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 14 Jun 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 18 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 18 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 19 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 19 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 22 Jun 2015 | | | | |
| Function: Shadowridge Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 22 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 23 Jun 2015 | | | | |
| Function: Shadowridge Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 23 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 24 Jun 2015 | | | | |
| Function: Shadowridge Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 24 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 25 Jun 2015 | | | | |
| Function: Shadowridge Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 25 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 26 Jun 2015 | | | | |
| Function: Shadowridge Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |

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User: [illegible]

**Facility Usage Report**

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Function: General Rental | 8:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 26 Jun 2015 | 16:30 | $900.00 | $0.00 | $900.00 |
| Date: 27 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $85.00 | $835.00 |
| Total for Date: 27 Jun 2015 | 6:00 | $750.00 | $85.00 | $835.00 |
| Date: 30 Jun 2015 | | | | |
| Function: General Rental | 1:00 | $2,803.00 | $0.00 | $2,803.00 |
| Function: General Rental | 1:00 | $197.69 | $0.00 | $197.69 |
| Total for Date: 30 Jun 2015 | 2:00 | $3,000.69 | $0.00 | $3,000.69 |
| Date: 07 Jul 2015 | | | | |
| Function: General Rental | 1:00 | $523.00 | $0.00 | $523.00 |
| Total for Date: 07 Jul 2015 | 1:00 | $523.00 | $0.00 | $523.00 |
| Date: 10 Jul 2015 | | | | |
| Function: General Rental | 0:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 10 Jul 2015 | 0:00 | $350.00 | $0.00 | $350.00 |
| Date: 11 Jul 2015 | | | | |
| Function: General Rental | 0:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 11 Jul 2015 | 12:00 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 16 Jul 2015 | | | | |
| Function: General Rental | 7:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 1:00 | $218.00 | $0.00 | $218.00 |
| Function: General Rental | 1:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 16 Jul 2015 | 9:00 | $2,468.00 | $0.00 | $2,468.00 |
| Date: 17 Jul 2015 | | | | |
| Function: General Rental | 11:00 | $1,500.00 | $0.00 | $1,500.00 |
| Function: General Rental | 1:00 | $72.00 | $0.00 | $72.00 |
| Total for Date: 17 Jul 2015 | 12:00 | $1,572.00 | $0.00 | $1,572.00 |
| Date: 18 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 18 Jul 2015 | 12:00 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 23 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $550.00 | $0.00 | $550.00 |
| Total for Date: 23 Jul 2015 | 6:00 | $550.00 | $0.00 | $550.00 |
| Date: 25 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 25 Jul 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 28 Jul 2015 | | | | |
| Function: General Rental | 1:00 | $577.00 | $0.00 | $577.00 |
| Total for Date: 28 Jul 2015 | 1:00 | $577.00 | $0.00 | $577.00 |
| Date: 01 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 01 Aug 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 07 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 07 Aug 2015 | 6:00 | $900.00 | $0.00 | $900.00 |
| Date: 08 Aug 2015 | | | | |

*Printed: 22 Dec 2015, 10:19 AM*
*User: [illegible]*

**Facility Usage Report**

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Function: General Rental | 6.00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 09 Aug 2015 | 6.00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 09 Aug 2015 | | | | |
| Function: General Rental | 6.00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 09 Aug 2015 | 6.00 | $750.00 | $0.00 | $750.00 |
| Date: 14 Aug 2015 | | | | |
| Function: General Rental | 1.00 | $451.00 | $0.00 | $451.00 |
| Total for Date: 14 Aug 2015 | 1.00 | $451.00 | $0.00 | $451.00 |
| Date: 15 Aug 2015 | | | | |
| Function: General Rental | 4.00 | $900.00 | $0.00 | $900.00 |
| Function: General Rental | 8.00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 15 Aug 2015 | 12.00 | $2,400.00 | $0.00 | $2,400.00 |
| Date: 16 Aug 2015 | | | | |
| Function: General Rental | 5.00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 16 Aug 2015 | 5.00 | $900.00 | $0.00 | $900.00 |
| Date: 21 Aug 2015 | | | | |
| Function: General Rental | 6.00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 21 Aug 2015 | 6.00 | $350.00 | $0.00 | $350.00 |
| Date: 22 Aug 2015 | | | | |
| Function: General Rental | 14.00 | $1,500.00 | $65.00 | $1,565.00 |
| Total for Date: 22 Aug 2015 | 14.00 | $1,500.00 | $65.00 | $1,565.00 |
| Date: 28 Aug 2015 | | | | |
| Function: General Rental | 1.00 | $256.00 | $0.00 | $256.00 |
| Total for Date: 28 Aug 2015 | 1.00 | $256.00 | $0.00 | $256.00 |
| Date: 29 Aug 2015 | | | | |
| Function: General Rental | 6.00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 29 Aug 2015 | 6.00 | $750.00 | $0.00 | $750.00 |
| Date: 30 Aug 2015 | | | | |
| Function: General Rental | 6.00 | $750.00 | $30.00 | $780.00 |
| Total for Date: 30 Aug 2015 | 6.00 | $750.00 | $30.00 | $780.00 |
| Date: 05 Sep 2015 | | | | |
| Function: General Rental | 0.00 | $0.00 | $0.00 | $0.00 |
| Total for Date: 05 Sep 2015 | 0.00 | $0.00 | $0.00 | $0.00 |
| Date: 05 Sep 2015 | | | | |
| Function: General Rental | 0.00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 05 Sep 2015 | 0.00 | $750.00 | $0.00 | $750.00 |
| Date: 12 Sep 2015 | | | | |
| Function: General Rental | 14.00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 12 Sep 2015 | 14.00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 13 Sep 2015 | | | | |
| Function: General Rental | 14.00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 13 Sep 2015 | 14.00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 17 Sep 2015 | | | | |
| Function: General Rental | 6.00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 17 Sep 2015 | 6.00 | $900.00 | $0.00 | $900.00 |
| Date: 18 Sep 2015 | | | | |
| Function: General Rental | 6.00 | $900.00 | $0.00 | $900.00 |

Printed: 22 Dec 2015 10:16 AM
User: [illegible]

**Facility Usage Report**

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Total for Date: 18 Sep 2015 | 0.00 | $900.00 | $0.00 | $900.00 |
| Date: 18 Sep 2015 | | | | |
| Function: General Rental | 12.00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 18 Sep 2015 | 12.00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 20 Sep 2015 | | | | |
| Function: General Rental | 14.00 | $300.00 | $583.75 | $1,883.75 |
| Total for Date: 20 Sep 2015 | 14.00 | $300.00 | $583.75 | $1,883.75 |
| Date: 04 Oct 2015 | | | | |
| Function: Special Event | 10.00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 04 Oct 2015 | 10.00 | $750.00 | $0.00 | $750.00 |
| Date: 11 Oct 2015 | | | | |
| Function: General Rental | 0.00 | $900.00 | $125.00 | $1,075.00 |
| Total for Date: 11 Oct 2015 | 0.00 | $900.00 | $125.00 | $1,075.00 |
| Date: 17 Oct 2015 | | | | |
| Function: General Rental | 14.00 | $1,500.00 | $1,200.00 | $2,700.00 |
| Total for Date: 17 Oct 2015 | 14.00 | $1,500.00 | $1,200.00 | $2,700.00 |
| Date: 19 Dec 2015 | | | | |
| Function: General Rental | 6.00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 19 Dec 2015 | 6.00 | $750.00 | $0.00 | $750.00 |
| Total for Facility: Lotus Shelter | 473.20 | $59,625.35 | $2,756.73 | $62,482.68 |
| Total for Complex: Seaside Lagoon | 473.20 | $59,625.35 | $2,756.73 | $62,482.68 |
| Report Totals: | 473.20 | $59,625.35 | $2,756.73 | $62,482.68 |

# APPENDIX B: DEIR Water Quality Responses from City of Redondo Beach

Eleanor Manzano
City Clerk

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 318-0656
fax 310 374-0220

December 14th 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 10th, 2015, please be advised of the following:

Request #1: Are the results you sent me the ones referred to in the DEIR? If not please send those results including location and dates.

**Response**: Per our Engineering Department, the results we sent are the water quality samples referred to in the DEIR.

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you,

*Khatirah Nazif*

More to See redondo BEACH

Eleanor Manzano
City Clerk

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 318-0656
fax 310 374-0220

December 10th 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of November 30th, 2015, please be advised of the following:

Request #1: I request harbor water quality data for the past three years. I am asking for any data about sampling in the harbor including dates and locations of the samples.

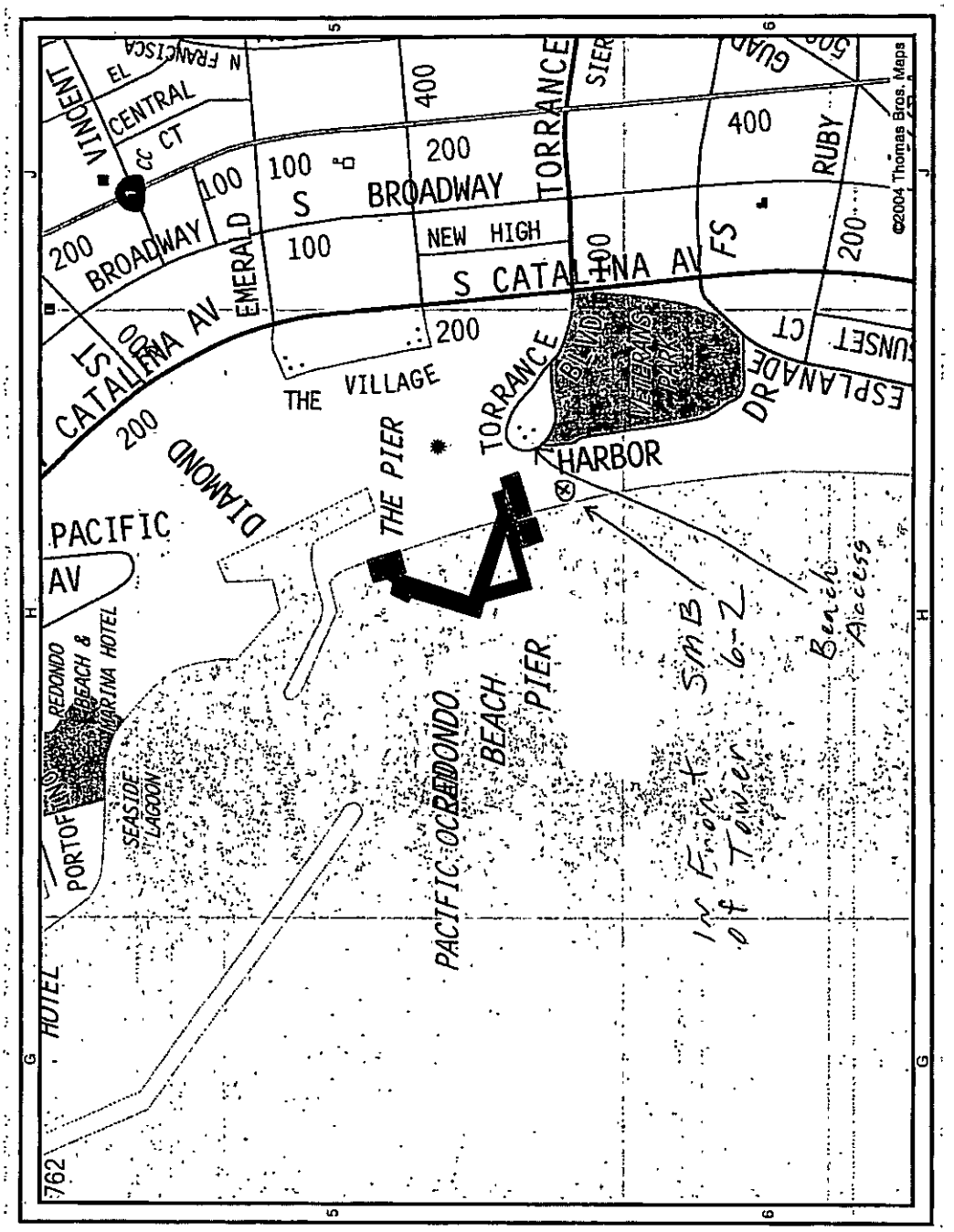
**Response**: Per our Engineering Department, please see attached water quality monitoring data for site SMB 6-2 with sampling result unit and the sampling location map.

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you,

*Khatirah Nazif*

Location of Water Quality Tests Used in DEIR


VINCENT
EL
CENTRAL
CC CT
N FRANCISCA
BROADWAY
S BROADWAY
EMERALD
NEW HIGH
S CATALINA AV
CATALINA AV
ST
THE VILLAGE
TORRANCE
SIER
GUAD
RUBY
FS
SUNSET CT
ESPLANADE DR
BLVD
VETERANS PARK
HARBOR
THE PIER
DIAMOND
PACIFIC
AV
REDONDO BEACH & MARINA HOTEL
PORTOFINO
SEASIDE LAGOON
HOTEL
PACIFIC OCREDONDO BEACH PIER
SMB 6-2
Beach Access
In Front of Tower
762
©2004 Thomas Bros. Maps

| Sample Date | Enterococcus Unit (count per 100 ml) | Fecal Coliform Unit (count per 100 ml) | Total Coliform Unit (count per 100 ml) |
|---|---|---|---|
| 7/2/2012 | 30 | 10 | 10 |
| 7/9/2012 | 10 | 110 | 278 |
| 7/16/2012 | 10 | 10 | 121 |
| 7/23/2012 | 10 | 144 | 242 |
| 7/30/2012 | 10 | 717 | 1570 |
| 8/1/2012 | 10 | 158 | 221 |
| 8/6/2012 | 75 | 41 | 74 |
| 8/13/2012 | 10 | 20 | 135 |
| 8/20/2012 | 109 | 164 | 561 |
| 8/23/2012 | 31 | 173 | 213 |
| 8/27/2012 | 10 | 223 | 345 |
| 9/3/2012 | 86 | 1309 | 3076 |
| 9/5/2012 | 10 | 203 | 231 |
| 9/10/2012 | 10 | 74 | 296 |
| 9/17/2012 | 135 | 594 | 3654 |
| 9/19/2012 | 272 | 146 | 379 |
| 9/21/2012 | 10 | 31 | 153 |
| 9/24/2012 | 10 | 120 | 148 |
| 10/1/2012 | 187 | 457 | 512 |
| 10/3/2012 | 528 | 520 | 772 |
| 10/5/2012 | 20 | 108 | 131 |
| 10/8/2012 | 31 | 209 | 826 |
| 10/15/2012 | 73 | 98 | 359 |
| 10/22/2012 | 52 | 10 | 247 |
| 10/29/2012 | 10 | 161 | 2489 |
| 11/5/2012 | 241 | 323 | 886 |
| 11/7/2012 | 31 | 246 | 749 |

| | | | |
|---|---|---|---|
| 11/12/2012 | 63 | 275 | 633 |
| 11/19/2012 | 75 | 86 | 295 |
| 11/26/2012 | 31 | 85 | 292 |
| 12/3/2012 | 488 | 530 | 1500 |
| 12/10/2012 | 10 | 10 | 201 |
| 12/17/2012 | 10 | 20 | 202 |
| 12/24/2012 | 20 | 10 | 158 |
| 12/31/2012 | 41 | 144 | 305 |
| 1/7/2013 | 109 | 31 | 317 |
| 1/14/2013 | 10 | 10 | 30 |
| 1/21/2013 | 63 | 86 | 216 |
| 1/28/2013 | 63 | 20 | 275 |
| 2/4/2013 | 31 | 146 | 187 |
| 2/11/2013 | 10 | 10 | 63 |
| 2/18/2013 | 10 | 20 | 52 |
| 2/25/2013 | 10 | 10 | 10 |
| 3/4/2013 | 10 | 20 | 20 |
| 3/11/2013 | 86 | 292 | 836 |
| 3/18/2013 | 20 | 20 | 75 |
| 3/25/2013 | 10 | 30 | 120 |
| 4/1/2013 | 20 | 74 | 209 |
| 4/8/2013 | 86 | 86 | 146 |
| 4/15/2013 | 10 | 10 | 10 |
| 4/22/2013 | 10 | 10 | 10 |
| 4/29/2013 | 20 | 63 | 134 |
| 5/6/2013 | 20 | 10 | 52 |
| 5/13/2013 | 10 | 10 | 173 |
| 5/20/2013 | 10 | 10 | 75 |
| 5/27/2013 | 10 | 10 | 131 |
| 6/3/2013 | 10 | 10 | 206 |

| | | | |
|---|---|---|---|
| 6/10/2013 | 20 | 41 | 1031 |
| 6/17/2013 | 10 | 10 | 61 |
| 6/24/2013 | 10 | 10 | 40 |
| 7/1/2013 | 20 | 84 | 280 |
| 7/8/2013 | 63 | 120 | 260 |
| 7/15/2013 | 20 | 74 | 440 |
| 7/22/2013 | 10 | 987 | 987 |
| 7/24/2013 | 10 | 10 | 85 |
| 7/29/2013 | 10 | 30 | 73 |
| 8/5/2013 | 10 | 120 | 360 |
| 8/12/2013 | 10 | 10 | 155 |
| 8/19/2013 | 161 | 173 | 480 |
| 8/21/2013 | 10 | 158 | 609 |
| 8/26/2013 | 63 | 230 | 350 |
| 9/2/2013 | 10 | 10 | 41 |
| 9/9/2013 | 63 | 110 | 173 |
| 9/16/2013 | 10 | 10 | 130 |
| 9/23/2013 | 160 | 250 | 530 |
| 9/25/2013 | 62 | 85 | 110 |
| 9/30/2013 | 20 | 10 | 20 |
| 10/7/2013 | 97 | 120 | 270 |
| 10/14/2013 | 10 | 10 | 150 |
| 10/21/2013 | 150 | 380 | 1100 |
| 10/23/2013 | 160 | 140 | 390 |
| 10/28/2013 | 10 | 10 | 10 |
| 11/4/2013 | 52 | 97 | 173 |
| 11/11/2013 | 10 | 41 | 74 |
| 11/18/2013 | 10 | 63 | 200 |
| 11/25/2013 | 10 | 380 | 580 |
| 12/2/2013 | 52 | 310 | 1100 |

| | | | |
|---|---|---|---|
| 12/9/2013 | 10 | 10 | 75 |
| 12/16/2013 | 120 | 310 | 1300 |
| 12/18/2013 | 20 | 110 | 510 |
| 12/23/2013 | 10 | 41 | 960 |
| 12/30/2013 | 120 | 140 | 1600 |
| 1/2/2014 | 10 | 210 | 1300 |
| 1/6/2014 | 10 | 96 | 620 |
| 1/13/2014 | 10 | 63 | 400 |
| 1/20/2014 | 180 | 97 | 4100 |
| 1/22/2014 | 52 | 110 | 4100 |
| 1/27/2014 | 97 | 260 | 5500 |
| 2/3/2014 | 330 | 410 | 500 |
| 2/5/2014 | 30 | 10 | 10 |
| 2/10/2014 | 10 | 20 | 121 |
| 2/17/2014 | 86 | 240 | 290 |
| 2/24/2014 | 41 | 60 | 760 |
| 3/3/2014 | 10 | 20 | 75 |
| 3/10/2014 | 10 | 31 | 320 |
| 3/17/2014 | 310 | 280 | 890 |
| 3/19/2014 | 10 | 10 | 160 |
| 3/24/2014 | 20 | 230 | 290 |
| 3/31/2014 | 10 | 10 | 30 |
| 4/7/2014 | 10 | 10 | 10 |
| 4/14/2014 | 10 | 10 | 10 |
| 4/21/2014 | 10 | 20 | 51 |
| 4/28/2014 | 10 | 20 | 52 |
| 5/5/2014 | 10 | 10 | 20 |
| 5/12/2014 | 10 | 10 | 10 |
| 5/19/2014 | 10 | 10 | 41 |
| 5/26/2014 | 10 | 10 | 41 |

| | | | |
|---|---|---|---|
| 6/2/2014 | 10 | 10 | 30 |
| 6/9/2014 | 20 | 10 | 10 |
| 6/16/2014 | 41 | 63 | 500 |
| 6/23/2014 | 10 | 10 | 75 |
| 6/30/2014 | 10 | 20 | 400 |
| 7/7/2014 | 10 | 10 | 51 |
| 7/14/2014 | 10 | 10 | 210 |
| 7/21/2014 | 10 | 41 | 200 |
| 7/28/2014 | 85 | 31 | 1455 |
| 8/4/2014 | 63 | 61 | 168 |
| 8/11/2014 | 20 | 63 | 187 |
| 8/18/2014 | 10 | 161 | 388 |
| 8/25/2014 | 94 | 663 | 9804 |
| 8/27/2014 | 10 | 10 | 51 |
| 9/1/2014 | 10 | 862 | 19863 |
| 9/4/2014 | 10 | 31 | 616 |
| 9/8/2014 | 10 | 130 | 4800 |
| 9/15/2014 | 171 | 275 | 12033 |
| 9/17/2014 | 10 | 10 | 345 |
| 9/22/2014 | 121 | 670 | 9208 |
| 9/24/2014 | 145 | 958 | 24196 |
| 9/26/2014 | 512 | 107 | 1664 |
| 9/28/2014 | 41 | 52 | 315 |
| 9/29/2014 | 97 | 110 | 1576 |
| 10/6/2014 | 31 | 75 | 530 |
| 10/13/2014 | 10 | 10 | 41 |
| 10/20/2014 | 10 | 20 | 247 |
| 10/27/2014 | 41 | 265 | 432 |
| 11/3/2014 | 84 | 108 | 1063 |
| 11/10/2014 | 441 | 1022 | 1354 |

| | | | |
|---|---|---|---|
| 11/12/2014 | 20 | 233 | 650 |
| 11/17/2014 | 20 | 10 | 131 |
| 11/24/2014 | 20 | 148 | 910 |
| 12/1/2014 | 41 | 41 | 279 |
| 12/8/2014 | 573 | 1439 | 5794 |
| 12/10/2014 | 602 | 1274 | 2187 |
| 12/12/2014 | 379 | 201 | 1842 |
| 12/15/2014 | 63 | 41 | 181 |
| 12/22/2014 | 393 | 379 | 1421 |
| 12/24/2014 | 63 | 201 | 839 |
| 12/29/2014 | 10 | 20 | 31 |
| 1/5/2015 | 20 | 84 | 332 |
| 1/12/2015 | 10 | 10 | 85 |
| 1/26/2015 | 10 | 10 | 98 |
| 2/2/2015 | 31 | 131 | 294 |
| 2/9/2015 | 63 | 98 | 605 |
| 2/16/2015 | 75 | 122 | 638 |
| 2/23/2015 | 41 | 31 | 52 |
| 3/2/2015 | 12997 | 19863 | 24196 |
| 3/4/2015 | 1112 | 2359 | 4611 |
| 3/6/2015 | 20 | 85 | 216 |
| 3/9/2015 | 75 | 75 | 548 |
| 3/16/2015 | 109 | 195 | 397 |
| 3/18/2015 | 265 | 173 | 399 |
| 3/23/2015 | 10 | 10 | 75 |
| 3/30/2015 | 31 | 75 | 402 |
| 4/6/2015 | 10 | 10 | 211 |
| 4/13/2015 | 10 | 10 | 144 |
| 4/20/2015 | 10 | 10 | 228 |
| 4/27/2015 | 10 | 10 | 10 |

| | | | |
|---|---|---|---|
| 5/4/2015 | 31 | 75 | 204 |
| 5/11/2015 | 10 | 52 | 317 |
| 5/18/2015 | 10 | 10 | 63 |
| 5/25/2015 | 10 | 10 | 1430 |
| 6/1/2015 | 10 | 10 | 262 |
| 6/8/2015 | 10 | 243 | 327 |
| 6/15/2015 | 10 | 10 | 189 |
| 6/22/2015 | 10 | 10 | 63 |
| 6/29/2015 | 10 | 10 | 220 |
| 7/6/2015 | 10 | 41 | 640 |
| 7/13/2015 | 10 | 62 | 984 |
| 7/20/2015 | 10 | 63 | 602 |
| 7/27/2015 | 10 | 10 | 110 |
| 8/3/2015 | 10 | 95 | 119 |
| 8/10/2015 | 10 | 10 | 181 |
| 8/17/2015 | 10 | 41 | 395 |
| 8/24/2015 | 10 | 10 | 30 |
| 8/31/2015 | 52 | 63 | 512 |
| 9/7/2015 | 10 | 20 | 185 |
| 9/14/2015 | 10 | 63 | 865 |
| 9/21/2015 | 10 | 199 | 910 |
| 9/28/2015 | 86 | 1951 | 3169 |
| 9/30/2015 | 10 | 1430 | 12997 |
| 10/2/2015 | 31 | 350 | 5012 |
| 10/5/2015 | 10 | 98 | 691 |
| 10/12/2015 | 10 | 1012 | 5748 |
| 10/14/2015 | 161 | 1860 | 6131 |
| 10/16/2015 | 1081 | 15531 | 24196 |
| 10/19/2015 | 110 | 329 | 5012 |
| 10/21/2015 | 10 | 480 | 12997 |

| | | | |
|---|---|---|---|
| 10/23/2015 | 63 | 638 | 5794 |
| 10/26/2015 | 10 | 703 | 4786 |
| 11/2/2015 | 10 | 52 | 206 |
| 11/9/2015 | 41 | 238 | 913 |
| 11/16/2015 | 148 | 269 | 788 |
| 11/18/2015 | 134 | 31 | 127 |
| 11/20/2015 | 20 | 10 | 218 |

# Appendix C: City Public Records Act Response to Harbor Village Traffic Analysis

**Lupe Cazares** January 7, 2016 at 4:08 PM

To: James Light Cc: Khatirah Nazif, Eleanor Manzano.

RE: Redondo Beach - Customer Service Center case number 24636

Mr. Light,

Please see below the response from the Community Development Department:

Traffic consulting services were initiated for the AES Harbor Village project but not completed as this project failed. No preliminary draft traffic information was retained by the City for this project.

Thank you,

Lupe Cazares

**From:** Jim Light [mailto:jim.light1@verizon.net]
**Sent:** Wednesday, December 23, 2015 9:39 AM
**To:** Lupe Cazares <Lupe.Cazares@redondo.org>
**Cc:** Khatirah Nazif <Khatirah.Nazif@redondo.org>; Eleanor Manzano <Eleanor.Manzano@redondo.org>
**Subject:** Re: Redondo Beach - Customer Service Center case number 24636

Thank you for the response. The contract with CDM Smith was modified to require the generation of the requested data. If the contract was subsequently modified to delete this requirement, I request the documentation of this contract change.

Jim Light

# Appendix D: City Public Records Act Response regarding Seaside Lagoon Park

**Eleanor Manzano**
City Clerk

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 318-0656
fax 310 374-0220

December 22, 2015

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 15, 2015, please be advised of the following:

Request #1: "Per the California Public Records Act, I request the following follow up information to the response below:"

1. 1) Seaside Lagoon visitors broken out by day for the 2015 season.

2. 2) Does the number provided in the response below include special events, private events,
   and kid's camps?

3. 3) Please provide a list of the special events, public and private, and kid's camps held at the
   Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are

included in the total provided in the response below.

4. 4) Please provide the acreage of the Seaside Lagoon in the Waterfront Project DEIR that is free from any new development. Please provide that number at high tide, medium tide and low tide.

Response: Per our Community Services Department, Responses to items 1, 2, & 3 are attached in a single .pdf file.

For item 4: We anticipate more time is needed. Accordingly, pursuant to Government Code Section 6253(c), the City of Redondo Beach is requesting an additional fourteen (14) days.

Please contact our office at (310) 318-0656 with any further questions.
Thank you,
Lupe Cazares

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# Facility Usage Report

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Total for Date: 06 Jun 2015 | 12:00 | $2,400.00 | $0.00 | $2,400.00 |
| Date: 07 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 07 Jun 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 08 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $30.00 | $380.00 |
| Total for Date: 08 Jun 2015 | 6:00 | $350.00 | $30.00 | $380.00 |
| Date: 09 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $550.00 | $0.00 | $550.00 |
| Total for Date: 09 Jun 2015 | 6:00 | $550.00 | $0.00 | $550.00 |
| Date: 10 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $375.00 | $0.00 | $375.00 |
| Total for Date: 10 Jun 2015 | 6:00 | $375.00 | $0.00 | $375.00 |
| Date: 11 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 11 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 12 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $375.00 | $0.00 | $375.00 |
| Function: General Rental | 4:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 12 Jun 2015 | 10:00 | $1,275.00 | $0.00 | $1,275.00 |
| Date: 13 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 5:59 | $900.00 | $0.00 | $900.00 |
| Total for Date: 13 Jun 2015 | 11:59 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 14 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 14 Jun 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 16 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 16 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 19 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 19 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 22 Jun 2015 | | | | |
| Function: Breakwater Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 22 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 23 Jun 2015 | | | | |
| Function: Breakwater Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 23 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 24 Jun 2015 | | | | |
| Function: Breakwater Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 24 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 25 Jun 2015 | | | | |
| Function: Breakwater Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |
| Total for Date: 25 Jun 2015 | 9:30 | $0.00 | $0.00 | $0.00 |
| Date: 26 Jun 2015 | | | | |
| Function: Breakwater Day Camp | 9:30 | $0.00 | $0.00 | $0.00 |

## Seaside Lagoon
## Weekly Attendance Report
## Summer 2015

| Week | Weekly Attendance |
|---|---|
| 5/23 – 5/29 | 1,331 |
| 5/30 – 6/5 | 918 |
| 6/6 – 6/12 | 1,659 |
| 6/13 – 6/19 | 3,085 |
| 6/20 – 6/26 | 6,087 |
| 6/27 – 7/3 | 7,970 |
| 7/4 – 7/10 | 6,299 |
| 7/11 – 7/17 | 7,461 |
| 7/18 – 7/24 | 5,516 |
| 7/25 – 7/31 | 8,532 |
| 8/1 – 8/7 | 7,495 |
| 8/8 – 8/14 | 6,917 |
| 8/15 – 8/21 | 6,405 |
| 8/22 – 8/28 | 4,320 |
| 8/29 – 9/4 | 3,878 |
| 9/5 – 9/7 | 3,455 |
| | |
| Total | 81,328 |
| | |

# Registration Summary Report

*Printed: 17 Dec 2015, 04:01 PM*

*User: ccass*

Activity: Breakwater Day Camp
Registrations, and Withdrawals, and Transfer In, and Transfer Out, and Cancellations

Session: 2015 Spring Registration Session
Courses Suppressed: Yes

Brochure Section

| | # Reg | # W/D | Transfer In | Transfer Out | Cancellation | Net | Fee | Extra Fee | Total |
|---|---|---|---|---|---|---|---|---|---|
| **Camps** | | | | | | | | | |
| **Breakwater Day Camp (BWDC)** | | | | | | | | | |
| **Total: Breakwater Day Camp** | 663 | 74 | 0 | 0 | 0 | 589 | $96,892.00 | $2,128.00 | $99,020.00 |
| **Total: Camps** | 663 | 74 | 0 | 0 | 0 | 589 | $96,892.00 | $2,128.00 | $99,020.00 |
| **Report Total:** | 663 | 74 | 0 | 0 | 0 | 589 | $96,892.00 | $2,128.00 | $99,020.00 |

# Facility Usage Report

*Printed: 22 Dec 2015, 10:19 AM*
*User: ccass*

Booking Types: Rentals/QuickRez/Courses/Maint/Admin/Holiday
Date from: Thursday, January 01, 2015
Facility: Luau Shelter
Facility Option: Facility
Include Subfacilities: Yes
Date to: Thursday, December 31, 2015
Complex: Seaside Lagoon
Rental Status: Closed/Firm/Tentative

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| **Complex: Seaside Lagoon** | | | | |
| **Facility: Luau Shelter** **Hours Avail: 8760:00** | | | | |
| Date: 05 Mar 2015 | | | | |
| Function: General Rental | 1:00 | $496.46 | $15.48 | $511.94 |
| Total for Date: 05 Mar 2015 | 1:00 | $496.46 | $15.48 | $511.94 |
| Date: 07 Mar 2015 | | | | |
| Function: General Rental | 8:00 | $900.00 | $150.00 | $1,050.00 |
| Total for Date: 07 Mar 2015 | 8:00 | $900.00 | $150.00 | $1,050.00 |
| Date: 16 May 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 16 May 2015 | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 17 May 2015 | | | | |
| Function: Private Party | 7:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 17 May 2015 | 7:00 | $900.00 | $0.00 | $900.00 |
| Date: 24 May 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 24 May 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 25 May 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $112.50 | $1,612.50 |
| Total for Date: 25 May 2015 | 14:00 | $1,500.00 | $112.50 | $1,612.50 |
| Date: 27 May 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 27 May 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 28 May 2015 | | | | |
| Function: General Rental | 1:00 | $350.00 | $0.00 | $350.00 |
| Function: General Rental | 1:00 | $4,500.00 | $0.00 | $4,500.00 |
| Total for Date: 28 May 2015 | 2:00 | $4,850.00 | $0.00 | $4,850.00 |
| Date: 29 May 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 29 May 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 03 Jun 2015 | | | | |
| Function: General Rental | 1:00 | $189.00 | $0.00 | $189.00 |
| Function: General Rental | 1:00 | $552.00 | $0.00 | $552.00 |
| Total for Date: 03 Jun 2015 | 2:00 | $741.00 | $0.00 | $741.00 |
| Date: 04 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 04 Jun 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 06 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Function: General Rental | 6:00 | $1,500.00 | $0.00 | $1,500.00 |

*Printed: 22 Dec 2015, 10:19 AM*
*User: ccass*

**Facility Usage Report**

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 26 Jun 2015 | 15:30 | $900.00 | $0.00 | $900.00 |
| Date: 27 Jun 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $85.00 | $835.00 |
| Total for Date: 27 Jun 2015 | 6:00 | $750.00 | $85.00 | $835.00 |
| Date: 30 Jun 2015 | | | | |
| Function: General Rental | 1:00 | $2,803.00 | $0.00 | $2,803.00 |
| Function: General Rental | 1:00 | $197.89 | $0.00 | $197.89 |
| Total for Date: 30 Jun 2015 | 2:00 | $3,000.89 | $0.00 | $3,000.89 |
| Date: 07 Jul 2015 | | | | |
| Function: General Rental | 1:00 | $523.00 | $0.00 | $523.00 |
| Total for Date: 07 Jul 2015 | 1:00 | $523.00 | $0.00 | $523.00 |
| Date: 10 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 10 Jul 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 11 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 11 Jul 2015 | 12:00 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 16 Jul 2015 | | | | |
| Function: General Rental | 7:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 1:00 | $218.00 | $0.00 | $218.00 |
| Function: General Rental | 1:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 16 Jul 2015 | 9:00 | $2,468.00 | $0.00 | $2,468.00 |
| Date: 17 Jul 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Function: General Rental | 1:00 | $72.00 | $0.00 | $72.00 |
| Total for Date: 17 Jul 2015 | 15:00 | $1,572.00 | $0.00 | $1,572.00 |
| Date: 18 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 18 Jul 2015 | 12:00 | $1,650.00 | $0.00 | $1,650.00 |
| Date: 23 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $550.00 | $0.00 | $550.00 |
| Total for Date: 23 Jul 2015 | 6:00 | $550.00 | $0.00 | $550.00 |
| Date: 25 Jul 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 25 Jul 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 28 Jul 2015 | | | | |
| Function: General Rental | 1:00 | $577.00 | $0.00 | $577.00 |
| Total for Date: 28 Jul 2015 | 1:00 | $577.00 | $0.00 | $577.00 |
| Date: 01 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 01 Aug 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 07 Aug 2015 | | | | |
| Function: General Rental | 6.00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 07 Aug 2015 | 6.00 | $900.00 | $0.00 | $900.00 |
| Date: 08 Aug 2015 | | | | |

*Printed: 22 Dec 2015, 10:19 AM*
*User: ccass*

**Facility Usage Report**

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Function: General Rental | 6:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 08 Aug 2015 | 6:00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 09 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 09 Aug 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 14 Aug 2015 | | | | |
| Function: General Rental | 1:00 | $451.00 | $0.00 | $451.00 |
| Total for Date: 14 Aug 2015 | 1:00 | $451.00 | $0.00 | $451.00 |
| Date: 15 Aug 2015 | | | | |
| Function: General Rental | 4:00 | $900.00 | $0.00 | $900.00 |
| Function: General Rental | 8:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 15 Aug 2015 | 12:00 | $2,400.00 | $0.00 | $2,400.00 |
| Date: 16 Aug 2015 | | | | |
| Function: General Rental | 5:00 | $900.00 | $0.00 | $900.00 |
| Total for Date: 16 Aug 2015 | 5:00 | $900.00 | $0.00 | $900.00 |
| Date: 21 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $350.00 | $0.00 | $350.00 |
| Total for Date: 21 Aug 2015 | 6:00 | $350.00 | $0.00 | $350.00 |
| Date: 22 Aug 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $65.00 | $1,565.00 |
| Total for Date: 22 Aug 2015 | 14:00 | $1,500.00 | $65.00 | $1,565.00 |
| Date: 28 Aug 2015 | | | | |
| Function: General Rental | 1:00 | $256.00 | $0.00 | $256.00 |
| Total for Date: 28 Aug 2015 | 1:00 | $256.00 | $0.00 | $256.00 |
| Date: 29 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 29 Aug 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 30 Aug 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $30.00 | $780.00 |
| Total for Date: 30 Aug 2015 | 6:00 | $750.00 | $30 00 | $780.00 |
| Date: 05 Sep 2015 | | | | |
| Function. General Rental | 6:00 | $0.00 | $0.00 | $0.00 |
| Total for Date: 05 Sep 2015 | 6:00 | $0.00 | $0.00 | $0.00 |
| Date. 06 Sep 2015 | | | | |
| Function: General Rental | 6:00 | $750 00 | $0.00 | $750.00 |
| Total for Date: 06 Sep 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| Date: 12 Sep 2015 | | | | |
| Function. General Rental | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 12 Sep 2015 | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 13 Sep 2015 | | | | |
| Function. General Rental | 14:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 13 Sep 2015 | 14:00 | $1,500 00 | $0.00 | $1,500.00 |
| Date: 17 Sep 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $0.00 | $900 00 |
| Total for Date: 17 Sep 2015 | 6:00 | $900.00 | $0.00 | $900.00 |
| Date: 18 Sep 2015 | | | | |
| Function General Rental | 6:00 | $900.00 | $0.00 | $900.00 |

*Printed: 22 Dec 2015, 10:19 AM*
*User: ccass*

## Facility Usage Report

| | Duration | Fee Amount | Extra Fee Amt. | Total Revenue |
|---|---|---|---|---|
| Total for Date: 18 Sep 2015 | 6:00 | $900.00 | $0.00 | $900.00 |
| Date: 19 Sep 2015 | | | | |
| Function: General Rental | 13:00 | $1,500.00 | $0.00 | $1,500.00 |
| Total for Date: 19 Sep 2015 | 13:00 | $1,500.00 | $0.00 | $1,500.00 |
| Date: 20 Sep 2015 | | | | |
| Function: General Rental | 14:00 | $900.00 | $983.75 | $1,883.75 |
| Total for Date: 20 Sep 2015 | 14:00 | $900.00 | $983.75 | $1,883.75 |
| Date: 04 Oct 2015 | | | | |
| Function: Special Event | 10:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 04 Oct 2015 | 10:00 | $750.00 | $0.00 | $750.00 |
| Date: 11 Oct 2015 | | | | |
| Function: General Rental | 6:00 | $900.00 | $125.00 | $1,025.00 |
| Total for Date: 11 Oct 2015 | 6:00 | $900.00 | $125.00 | $1,025.00 |
| Date: 17 Oct 2015 | | | | |
| Function: General Rental | 14:00 | $1,500.00 | $1,200.00 | $2,700.00 |
| Total for Date: 17 Oct 2015 | 14:00 | $1,500.00 | $1,200.00 | $2,700.00 |
| Date: 19 Dec 2015 | | | | |
| Function: General Rental | 6:00 | $750.00 | $0.00 | $750.00 |
| Total for Date: 19 Dec 2015 | 6:00 | $750.00 | $0.00 | $750.00 |
| **Total for Facility: Luau Shelter** | **473:29** | **$59,685.35** | **$2,796.73** | **$62,482.08** |
| **Total for Complex: Seaside Lagoon** | **473:29** | **$59,685.35** | **$2,796.73** | **$62,482.08** |
| **Report Totals:** | **473:29** | **$59,685.35** | **$2,796.73** | **$62,482.08** |

**Eleanor Manzano**
City Clerk

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 318-0656
fax 310 374-0220

January 7, 2016

SENT VIA EMAIL: jim.light1@verizon.net

Dear Mr. Light:

Further to your request of December 15, 2015, please be advised of the following:

Request #1: "Per the California Public Records Act, I request the following follow up information to the response below:"

1. 1) Seaside Lagoon visitors broken out by day for the 2015 season.

2. 2) Does the number provided in the response below include special events, private events,
   and kid's camps?

3. 3) Please provide a list of the special events, public and private, and kid's camps held at the
   Seaside Lagoon for the 2015 season. Please provide the specific number for each event and if that is not available, an estimate. Also state whether the numbers provided in this answer are included in the total provided in the response below.

4. 4) Please provide the acreage of the Seaside Lagoon in the Waterfront Project DEIR that is free from any new development.

Please provide that number at high tide, medium tide and low tide.

Response 1-3: Per our Community Services Department, Responses to items 1, 2, & 3 were sent to you on December 22, 2015.

Response 4: **Per our Community Development Department, Some preliminary-draft investigations concerning acreages for the Seaside Lagoon were considered but not ultimately completed nor retained. The City does not have records of the requested information. It is anticipated that subsequent specific development plans would include acreage details of the Seaside Lagoon.**

We find this fulfills your request. Please contact our office at (310) 318-0656 with any further questions.

Thank you, Lupe Cazares

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# Appendix E: Referenced Documents Provided Separately

- Heart of the City Final EIR
- Measure G Ballot Supplement
- City of Redondo Beach Circulation Element
- City of Redondo Beach Parks and Recreation Element
- Measure B Text
- City of Hermosa Beach, Plan Hermosa Briefing
- CA Department of Boating and Waterways, LAYOUT, DESIGN AND CONSTRUCTION HANDBOOK FOR SMALL CRAFT BOAT LAUNCHING FACILITIES

## CITY PROCESS DESIGNED TO HINDER, DETER, AND LIMIT RESIDENT REVIEW, PARTICIPATION, AND COMMENT

The City produced a nearly 1500 page FEIR package that is heavily cross referenced in a format never before used by the city on a project of zoning change of this magnitude. The city continues change key elements of the project, especially the boat ramp location and configuration. The city is recommending bifurcating the approvals of the CenterCal project and the boat ramp, however, this move may eliminate the environmentally superior solution for the boat ramp and combined development. The city has not provided all the analysis on traffic. And the city relies on old studies and models for key impact assessments. The city has not conducted adequate analysis of safety and environmental impacts. For example after years of deliberation, the city has only a one day data point on harbor water quality for public swimming. And even today, the project description allows too much variability for a final project approval. The public has insufficient description and data to fully understand the true impacts of the final project.

### INSUFFICIENT TIME/MOVING TARGET –

The public cannot reasonably comment on a changing or I'll defined project.

### CHALLENGING FORMAT –

The complex cross-referencing renders the EIR much more difficult to understand, analyze and respond. By referring back to the DEIR, the city forces residents to look through nearly 8000 pages of information. The new format alone drives the need for more time for reasonable review.

## INCOMPLETE DATA–

The city has not provided full traffic analysis as requested nor has it completed adequate analysis of parking, traffic, harbor water quality, and recreational impacts of the devleopment.

A final note on missing data – BBR sent in a public records act request for any new analyses,studies and data generated since the DEIR was published. The city responded that all is available in the DEIR. BBR has been unable to find the detailed assessment of LOS for weekend conditions. The city responded to a second request specificially for the detailed LOS assessment and now the city has responded it needs more time. BBR cannot respond to an analysis the city has not made available..

## SUMMARY

BBR has been unable to fully analyze all data provided in and with the EIR.. BBR will continue to send in findings despite the expiration of the city's review period.
But regardless of the city responses, ***the EIR is not sufficient to define the impacts of a project that is at the entitlements stage. The appropriate action is to properly definitize the project including the location and configuration of the boat ramp, the final decision on the Sportfishing pier, and the number of slips to be reduced by the project. The city should and redo the impact analysis and rerelease as a Draft EIR.***

# FEIR IMPACT ASSESSMENTS

***BBR has been unable to complete a through review of all the information contained in the EIR. A top level analysis of the topics that follow is included based on the level of understanding that was achievable in the time period allotted.***

# IMPACT SUMMARY

| | Infrastructure or Amenity | Impact | Level of Impact |
|---|---|---|---|
| CDC-1 | Cumulative Development Cap | Project exceeds cumulative development cap. It consolidates too much of the cap into too small an area. | SIGNIFICANT – violation of state and local law. |
| HPWVA-1 | Human Powered Water Vessel access | Insufficient and inconvenient parking and access | No parking was assessed for these users despite growing popularity. City only speculates at use rate. Parking in parking structure is a deterrent to use. Proposed mitigations are unproven, not reasonable and are predictably not viable. |
| HPWVA-2 | Shared launch area with wading toddlers | Danger to toddlers. If lane is roped off it further limits usable space for toddlers. | SIGNIFICANT – Hazardous conditions are a deterrent to utilization. |
| HPWVA-3 | Shared launch site or close proximity to boat ramp | Danger to human powered water craft users. Dangers include improperly designed dock float (too high) or use of slippery boat ramp. Danger of trailer boater not seeing or being unable to avoid contact with human powered vessle. | HAZARDOUS SIGNIFICANT – dangerous solution. Uses should not be collocates in close proximity. Danger is a deterrent. To use. |

| | | | |
|---|---|---|---|
| SSL-1 | Seaside Lagoon | Decreased usable public parkland | SIGNIFICANT – Redondo is park poor by its own standard. This decreases usable parkland. Open space in commercial area is not configured to replace lost usable public parkland. EIR states there will be CenterCal events in the park area which will deny or further limit public access. |
| SSL-2 | Seaside Lagoon | Decreased toddler wading area | Significant – at mid tide loss is about 75% of wading area. |
| SSL-3 | Seaside Lagoon | Exposure to surge | HAZARDOUS/SIGNIFICANT – key attraction of current lagoon is the safety of no surge or wave action. |
| SSL-4 | Seaside Lagoon | Exposure to tide | HAZARDOUS/SIGNIFICANT – Lifeguards cannot rope off safe depth for toddler wading as in current lagoon. Tide changes will significantly impact safe toddler wading area. |
| SSL-5 | Seaside Lagoon | Exposure to breakwater rocks | HAZARDOUS/SIGNIFICANT – Large breakwater rocks on north and south end of proposed swim area would attract toddlers. Wet rocks, large holes, sharp edges combined with surge and tidal changes represents a significant hazard not present in current lagoon. |

| | | | |
|---|---|---|---|
| SSL-6 | Seaside Lagoon | Shared with hand launch vessels | HAZARDOUS/SIGNIFICANT – Kayaks and SUPs (especially beginners) launching and returning through wading toddlers is a hazard not present in current lagoon, especially when combined with surge.<br><br>Roping off launch area as separate from wading area further decreases usable wading area exacerbating that impact. |
| SSL-7 | Seaside Lagoon | Inconvenient parking | SIGNIFICANT – Parking in parking structure is a deterrent as it creates difficulty in moving family and gear to and from the lagoon. Visitors would have to negotiate parking structure, commercial shops, an active road and a pedestrian promenade before arriving at the lagoon. During summer weekends, limited parking could mean parking significant distances away which would deter utilization. Proposed parking configuration would not support buses used by school, church and similar groups who use the lagoon. |
| SSL - 8 | Seaside Lagoon | Loss of security fence | SECURITY/SIGNIFICANT - Families with children have confidence children cannot exit beach area alone and are protected from strangers outside the park. |

| | | | |
|---|---|---|---|
| SSL-9 | Seaside Lagoon | Swimming with boat traffic | HAZARDOUS/SIGNIFICANT – The EIR suggest older children/adults would swim in harbor. Boat traffic would have difficulty seeing swimmers. Very dangerous situation. If swimming is limited to current hand launched boat ramp breakwater area, the area is too small for recreational swimming. The breakwater rocks on the sides represent a hazard to adventurous older children and adults. |
| SSL-10 | Seaside Lagoon | Sea lion haul out potential | SIGNIFICANT/HAZARDOUS - Sea lions have been reported in the Marina parking lot. With the colony growing it is foreseeable that subdominant males would haul out on the beach. Waders, SUP'ers, and kayakers launching through or returning through sea lions would be hazardous and would violate MMPA. City officials are unlikely to be available at all hours. And there would be no means to call for help for a returning kayakers or SUP'er. |
| SSL-11 | Seaside Lagoon | Monthly water testing | HEALTH RISK/ SIGNIFICANT - The mitigation plan requires monthly testing. This does not provide adequate health protection to prevent/ minimize exposure to unhealthy, untreated harbor waters. |

| | | | |
|---|---|---|---|
| SSL-12 | Seaside Lagoon | Swim area silting | SIGNIFICANT – The EIR does not require the depth of swim area to be maintained. Swim area is already much smaller, losing more would increase impact. |
| SSL-13 | Seaside Lagoon | Loss of play fountains and water slides | SIGNIFICANT/HAZARDOUS – Children love playing in the fountains and water slides. Loss of these amenities would decrease attraction of facility. Also children likely to be attracted to breakwater rocks for entertainment in the water. |
| SSL-14 | Seaside Lagoon | Exposure to untreated harbor waters | HEALTH RISK/SIGNIFICANT – Waters north and south of the harbor fail health testing 25% of the time. City has only taken health related water quality tests on one day in harbor. Limited circulation combined with proximity to sea lion barge and bird guano on harbor breakwater rocks increases risk of unhealthy water. Flushing action of tide would be ineffective since ocean waters have questionable healthiness. |
| SSL – CUMULATIVE ASSESSMENT | | SEASIDE LAGOON CUMULATIVE IMPACT | HAZARDOUS, SIGNIFICANT, AVOIDABLE - Sum of impacts represent a significant and avoidable impact. **MITIGATION: maintain park usable open space in current configuration and same or similar water feature and provide convenient and adequate parking.** |

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|---|---|---|---|
| WP-1 | Waterfront Parking | Insufficient parking | SIGNIFICANT - Waterfront area parking assessment ignored recreational uses and current evidence of saturation of current parking with current development. Parking increase is insufficient to accommodate current uses plus added commercial development. Parking is inconvenient for recreational uses to far, dangerous street crossings, improperly configured for long water vessels...Artificially limits access to long existing recreational and coastal dependent uses. Difficulty of parking configuration represents a real deterrent to recreational uses. MITIGATION – more parking. Surface level parking set aside for recreational uses in vicinity of use. |
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| MMBR-1 | Mole B Boat Ramp | Parking – loss of over 70 current parking spaces, insufficient trailer parking | SIGNIFICANT – Parking analysis not provided. Insufficient parking for concurrent boating, launching and outrigger canoe club activities especially on summer weekends. City states that they will provide a parking attendant but has not revealed how that would remedy inadequate parking. City ignores growth of demand as economy recovers and population increases. No overflow parking defined or analyzed. Proposed reservation system would be ineffective. Proposed parking does not comply with State Guidelines and when added together the lack of parking is compounded. |
| MBBR-2 | Mole B Boat Ramp | Loss of 25-36 current, occupied boat slips | SIGNIFICANT – Current large boat slip utilization is currently at or near capacity. Demand for larger slips is expected to increase. Compounded by move of commercial vessels out of Basin 3 and potential elimination of slips in Basin 3. |

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| MBBR-3 | Mole B Boat Ramp | Basin 1 Fairway location – Hazard to Navigation | HAZARDOUS/SIGNIFICANT – Location at western end of narrow Basin 1 fairway puts trailer boat in in a cross wind situation and at a location with a blind turn and heavy boat and SUP traffic. Insufficient maneuvering space for queuing. Queuing dock/hoist dock is right in Galveston wall blind spot. Numerous well qualified boaters, ex-harbor masters, and lifeguards testified to the dangers that are denied by the city. City statements of early launches do not account for family boating and jet ski launches which would be during peak fairway utilization. Jetski's difficulty in maneuvering well at slow speed is well documented. This is exacerbated with infrequent jet skiers.<br><br>Mole B location MAXIMIZES interaction with existing boating traffic. Must utilize Basin 1 fairway and main harbor fairway. Trailer boats must traverse entire length of harbor to reach harbor mouth. |
| MBBR-4 | Mole B Boat Ramp | Crosswind | HAZARDOUS/SIGNIFICANT – Prevailing wind direction would blow vessels with motor problems into adjoining slips endangering the vessel in question and those downwind. Jet skiers have limited maneuverability at low speeds exacerbating this situation. |

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| MBBR-5 | Mole B Boat Ramp | Impacts on adjacent existing recreational uses | SIGNIFICANT – in addition to severe lack of parking during weekends and other peak use periods, the reconfiguration to accommodate the boat ramp reduces Moonstone Park and the room available for the outrigger canoe club operations. This could shut down the 46 year old, 300 member outrigger canoe club and decrease the public parkland. The city already fails its own parkland standard and the reduction of Moonstone Park is further exacerbated by the reduction of usable space at Seaside Lagoon. |
| MBBR-6 | Mole B Boat Ramp | Elimination of emergency helicopter airlift | HAZARDOUS/SIGNIFICANT – The City Council included the requirement for helicopter access to Mole B to support Harbor Patrol/lifeguard/Coast Guard emergency airlift operations related to the Harbor Patrol and Lifeguard docks and building on this Mole.. This capability was used July 6th to get a diver to a hyperbaric chamber on Catalina. The proposed configuration precludes meeting this stated requirement and puts the lives of the public at risk. |

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| MBBR-7 | Mole B Boat Ramp | Vehicular ingress and egress | HAZARDOUS/SIGNIFICANT – Mole B vehicular movement is hampered by two narrow lanes with parking on both sides and between the lanes. Ingress to the site is hampered by a limited turn pocket to get off Harbor Drive. Queueing to launch or return, especially on busy days when the parking is at or over capacity could result in traffic impacts on Harbor Drive and on all traffic, including emergency vehicle traffic into and out of the Mole to support Harbor Patrol and Lifeguard operations. |
| MBBR-Cumulative Assessment | | Mole B Boat Ramp Cumulative Assessment | HAZARDOUS/SIGNIFICANT/ IMMITIGABLE - Mole B is the worst alternative for a boat ramp in King Harbor. It will have significant impacts on long term existing recreational uses of the harbor. It presents hazards to navigation. And it impairs emergency activities critical to safe harbor operation. Of all alternatives, Mole B represents most transit distance and interaction with main fairways and existing boat traffic in harbor. **SUPERIOR ALTERNATIVES**: Moles C and D represent safer and less impactful solutions. |

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| MCBR-1 | Mole C Boat Ramp | Parking | LESS THAN SIGNIFICANT WITH MITIGATION– the Mole C Boat Ramp parking does not meet state guidelines. Also data from the Cabrillo boat ramp show traffic nearly every weekend would exceed proposed parking. MITIGATION: Overflow parking would have to be identified to meet expected and future needs. Potential sites include the Triton Oil site and the trailer parking east of Seaside Lagoon. However, both of these sites are currently slated for other uses. Moving overflow parking further away renders the solution untenable. |
| MCBR-2 | Mole C Boat Ramp | Cross winds | SIGNIFICANT – prevailing cross winds would blow vessels with motor / operator problems away from ramp into rocks or the Seaside Lagoon swim/kayak/SUP area. PARTIAL MITIGATION: Configuring a breakwall east of the ramp would eliminate the risk to swimmers, kayakers, SUP'ers. |

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| MCBR -3 | Mole C Boat Ramp | Maneuvering/Impact on existing SUP/ Kayak launch area | LESS THAN SIGNIFICANT WITH MITIGATIONS – The turn basin is the best location for a boat ramp due to the ability to maneuver with ample space outside the main traffic lanes. However, proximity to the Seaside Lagoon swim and launch area make this specific area heavily trafficked by human powered watercraft. MITIGATION: Can be mitigated by building a breakwall that separate traffic. Bouys in the water do NOT mitigate the risk as engine failure or operator error puts human powered craft at risk. Jet skis in particular are known for their poor maneuvering as low speeds.<br><br>Proximity to harbor mouth minimizes interaction with existing harbor traffic. |

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| MCBR-4 | Mole C Boat Ramp | Traffic/accessibility | SIGNIFICANT – Mole C suffers from the same limited turn pocket off of Harbor Drive that Mole B does. However, the roadway down Mole C is wider and does not have parking between and both sides of each lane. So it is better than Mole B. And since the Harbor Patrol is not on Mole C, emergency vehicle traffic is less of an impact. However, the planned parking structure and new road will bring more traffic into this immediate vicinity and Beryl is a major access road for the harbor. The traffic impacts are less than a boat ramp at Mole B but more than a ramp at Mole C. |
| MCBR-5 | Mole C Boat Ramp | Surge | LESS THAN SIGNIFICANT WITH MITIGATIONS – Harbor surge study is obsolete and should be reaccomplished with modern modeling techniques. However this is the highest surge alternative. MITIGATIONS: Curtail launching in large surge conditions. Or add a breakwall to diminish surge. |

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| MCBR-Cumulative Assessment | | Mole C Boat Ramp Cumulative Assessment | A Mole C boat ramp is environmentally superior to Mole B. The turn basin is the best solution waterside as it provides ample maneuvering and queueing space outside of high traffic lanes. However, the location still has immitigable impacts to traffic. The Crab Shack lease makes this alternative more expensive or it delays the solution unnecessarily. |
| MDBR-1 | Mole D Boat Ramp | Parking | SUPERIOR SOLUTION – Mole D already houses 67 trailer boat parking spots exceeding state guidelines for a two lane boat ramp. These parking spots can be relocated closer to the ramp site. |
| MDBR-2 | Mole D Boat Ramp | Prevailing winds | SUPERIOR SOLUTION – prevailing winds would push vessels that have lost the ability to maneuver back to the launch point. No potential impact on other boats or slips. |
| MDBR-3 | Mole D Boat Ramp | Maneuvering/Impacts on other recreational uses | SUPERIOR SOLUTION – Turn basin is best location as it affords ample maneuvering and queueing space outside of traffic lanes. If configured properly, ramp traffic would be well clear of Basin 3 Fairway and Sportfishing pier (for whale watching and Sportfishing vessel boarding). Least impact and largest safety margin for SUP and kayak traffic and launch points. |

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| MDBR-4 | Mole D Boat Ramp | Traffic Accessibility/ Impact | SUPERIOR SOLUTION – Trailer traffic off of Harbor Drive is not a major cross intersection with Harbor Drive. Traffic is easily separable from traffic for other uses. No long narrow mole traffic maneuvering issues. Ample room for turn radius and other maneuverability requirements. |
| MDBR-5 | Mole D Boat Ramp | Surge | LESS THAN SIGNIFICANT WITH MITIGATION – Surge models are outdated and should be reaccomplished with new modern modeling techniques. Better protected from surge than Mole C. No major wave damage in this area since outer breakwall was built higher and thicker. If major storm would create damage here, a boat ramp is cheaper to replace than a commercial building. MITIGATION: Ramp can be closed if surge conditions become dangerous. A breakwall could be added to reduce surge substantially. |
| MDBR-6 | Mole D Boat Ramp | Visual impacts | ENVIRONMENTALLY SUPERIOR SOLUTION – Using the south end of Mole D for boat ramp parking would preserve and enhance views from Czuleger Park. |
| MDBR-7 | Mole D Boat Ramp | Boat Hoist | SUPERIOR SOLUTION – Current boat hoist could be retained with no additional coast. |

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| MDBR-8 | Mole D Boat Ramp | Site connectivity | LESS THAN SIGNIFICANT – Pedestrian bridge can still be accommodated. Waterfront promenade could include view points on either side of the ramp, similar to solution proposed at Seaside Lagoon in current EIR. Promenade could provide two routes, one across the ramp/parking area for low utilization periods (similar to pedestrian crossing at Boat Yard crane access), and provide an alternate routing from International Boardwalk directly to sport fishing pier area. |
| MDBR-9 | Mole D Boat Ramp | Economic assessment | SUPERIOR SOLUTION - Only potential impacts to current leaseholds is Samba, which is on short term lease. Proposed Market Hall could be moved to a number of locations. Pacifica recommended a pier area location in their vision. Could also be in the International Boardwalk area where R10, Boardhouse, Marina Offices and Captain Kidd's are located. Other alternatives available as well. |

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| MDBR-Cumulative Assessment | Mole D Boat Ramp CUMULATIVE ASSESSMENT | ENVIRONMENTALLY AND ECONOMICALLY SUPERIOR ALTERNATIVE – Mole D is the superior location and represents the most balanced compromise of capacity, impacts and economic viability. A Mole D location has the least impact on long standing recreational uses in the harbor. The turn basin is the safest location from a maneuvering and boat traffic perspective. Mole D boat ramp would be the shortest transit to harbor mouth and is less surge than Mole C. And Mole D is the only location with adequate parking space. Mole D represents the least traffic impact as well. Economically, the site is available with no lease buy out at end of Samba current short term lease. No cost to retain current boat hoist. Solution best preserves views from Czuleger Park.<br><br>Before CenterCal project, in 2007 combined City staff, Harbor Commission and Harbor Boater representatives selected Mole D as best site in Harbor for a boat ramp. Original harbor boat ramp was located at Mole D. |

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| EX-1 | Exclusivity | Stated objective of development is to attract more affluent customers. Impact to lower cost uses reduces availability and desirability of harbor/pier area. | SIGNIFICANT – Project marketing states it seeks to attract higher income visitors. The project negatively impacts the uses that have the most regional draw. Exclusionary parking exacerbates the situation. MITIGATION – re balance project to emphasize enhance and increase uses that cater to all income levels. |
| TR-1 | Traffic | Traffic analysis not provided | BBR cannot complete traffic assessment until requested analyses are provided. |
| TR-2 | Traffic | Traffic analysis ignores infrastructure constraints. Under predicts impacts | SIGNIFICANT – the roads in the project area cannot handle the projected traffic increases despite EIR claims to the contrary. Evidence provided demonstrates conditions today exceed those projected after project completion.<br><br>MITIGATION- reduce project, improve infrastructure, or adjust mix of uses to eliminate impacts. |

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| TR-3 | Traffic | Lack of parking exacerbates traffic impacts | SIGNIFICANT – The project does not include sufficient parking for the proposed uses. As we experience on summer weekend at the harbor and the beach, this increases traffic as visitors circle parking areas and finally move into neighborhoods to find parking. This impact is not evaluated in the EIR, yet there is ample evidence and testimony that it happens today.<br><br>MITIGATION – provide adequate parking. Define offsite parking. Or downsize the development. |
| MS-1 | Massing and Scale | Massing and scale exceeds that of harbor and surrounding uses. Creates a virtual wall between the public and the harbor. | SIGNIFICANT - impacts desirability of bike track and area in general. Violate zoning. MITIGATION – scale back and better spread development between harbor and AES site. Moving parking structure offsite. |
| VI - 1 | View Impacts | Massing and density of development along Harbor Drive create a virtual wall of development drastically limiting views from Harbor Drive | SIGNIFICANT – more than 85% of current views blocked.. More if you include landscaping.<br><br>MITIGATION – decrease harbor-side development. Increase width of view corridors substantially. |

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| CI-1 | Cumulative Impacts | City still refuses to assess cumulative impacts which result in understated impacts | SIGNIFICANT – City has failed to address cumulative impacts described by multiple parties including the City of Hermosa Beach. Foreseeable projects are ignored and instead regional growth numbers defined over a large area are applied to the project without regard to reasonableness. This invalid practice artificially underrepresents impacts to the public.<br><br>MITIGATION – city reaccomplish assessments including foreseeable projects identified by multiple. Entities. |
| VI-2 | View Impacts | Market Hall and hotel area development block substantial amount of views from Czuleger park particularly mid and lower Czuleger Park. | SUBSTANTIAL - EIR does not assess view impacts from majority of park.<br><br>MITIGATION – reduce size of market hall and hotel area development. Or move market hall and hotel area development to reopen views. |
| BP-1 | Bike path | Bike path solution dangerous | HAZARDOUS SUBSTANTIAL – Proposed bike path adds three street crossing for all bicyclists in both directions. Does not connect with Habor Drive Bike Track.<br><br>MITIGATION – redesign to west side of new road. |

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| BP-2 | Bike Path | Shared use dangerous | HAZARDOUS SUBSTANTIAL – EIR still pretends it is safe to commingle pedestrian traffic and bike traffic so they can claim increased accessibility. Yet the current pier area crossing and pier areas at Hermosa and Manhattan require bicyclists to walk during peak periods. Bike peaks will occur at pedestrian peaks in shopping area precluding any substantive bike utilization.<br><br>MITIGATION – separate bike traffic from pedestrian traffic in shopping areas. |
| LC-1 | Legal Compliance | Project violate numerous state and local laws and requirements | SUBSTANTIAL – multiple violations of Coastal Act, Redondo Beach Local Coastal Program and Municipal Code.<br><br>MITIGATION – redesign project to better balance coastal dependent uses with general commercial uses. See recommended project alternative. |

## DEVELOPMENT CAP ASSESSMENT

The City's response and interpretation of the development cap defined in the zoning is a convenient interpretation that supports their desired solution but is not well based on the factors of the matter. In the zoning that was put before the voters, the city used two clear and distinct terms. Whenever they were referring to floor area ratio for development the city used the specific term "floor area, gross" or "gross floor area". And floor area gross is clearly defined to exclude parking. However, where ever the city referred to the total development cap for the CC

areas they repeatedly used the term "floor area". City staff never created a definition for this term. Because this zoning was established by a vote of the people of Redondo, it is the understanding and interpretation of the voters when they voted on the zoning that matters, rather than some interpretation by planning staff years later.

Since there was no definition of "floor area" in any material before the voter (including the ballot materials and in the campaign literature) and the city distinctly and exclusively used "floor area, gross" or "gross floor area" elsewhere in the zoning before the voters, it is only natural for the voter to conclude that all additional "cumulative development" would be included in the development cap. Absent a specific definition it is unreasonable to conclude the public would think the advertised development cap would exclude parking. That would mean the public voted to allow the city an unlimited amount of parking structure development. That is not a reasonable conclusion. The assertion that the general public did not believe that the zoning development cap did not apply to the parking structure is evidenced by the vast majority of public comments that specifically take issue with new parking structure. If the city meant the development cap did not include parking structures, why did the city not use the term "gross floor area" or "floor area, gross" as they do so many other places in the zoning?. If the city meant for the development cap to use they should have used their defined term "floor area, gross." The City did not.

The ballot text chosen by the city also provides an indicator of what the residents thought they were voting for. The ballot language for Measure G asked: "Shall the Coastal Land Use Plan and the Zoning Ordinance for the Coastal Zone for the AES Power Plant, the Catalina Avenue corridor and the Harbor/Pier areas of the City of Redondo Beach be amended to provide for major changes in existing policies and development standards including: affirming Coastal Commission recommendations, **limiting total development**, height limitations, **floor area ratio limitations**, permitting parks on the AES site and gaining local authority to issue coastal development authority." This question in the ballot clearly separates floor area limitations (which use floor area, gross) from total development limits. It is unreasonable that the residents interpreted "limiting total development" to exclude parking structures.

The City cites an example of questions during the deliberations of the Harbor Commission on the Measure G zoning, but it mischaracterizes the question. The question in that case was whether parking is included in Floor Area Ratio calculations. That answer is clearly no. The question was not whether parking structures were included in the 400,000 sq ft cumulative development cap. City staff then opines that figures given out for Shade Hotel did not include the floor area related to parking. Firstly, the Shade Hotel does not have parking as part of its structure. Parking is surface parking and offsite parking. Secondly, even if it did at the time, the cap was so far away from being "filled" the public did not pay attention. Clearly, the Shade Hotel would be below the cap. So the fact that staff "got away" with their interpretation there is hardly evidence of what the public understood when they voted for the current zoning language.

## HUMAN POWERED WATER VESSEL ACCESS

1. The FEIR continues to ignore the impacts of the project parking configuration on the accessibility for the growing number of people who use the harbor to launch stand-up paddleboards (SUPs) and kayaks.

2. GROWING NUMBER OF SUP AND KAYAK PARTICIPANTS. Both SUP and kayak fishing are growing sports and more and more people participate in these activities. These activities are especially popular on summer weekends, but are also popular on weekdays. The times of peak use vary by type of participant. During the weekday, mornings and right after work hours represent peak usage. During weekends users are spread throughout the day. In the morning and evening kayak fishermen launch in greater numbers. SUP'ers who SUP for a workout generally launch early on weekends to take advantage of calm seas. Families, recreational users, and yoga SUP'ers launch midday as the air temperature warms up. While the comments to the FEIR chastise BBR for not supplying numbers, BBR does not have the resources to collect this data. However, the city is well award of the growth of SUP'ing and kayak fishing based on city meetings on SUP harbor traffic conflicts, SUP rental concessions, and on the Palos

Verdes peninsula MLPA proceedings. If the city wants to accurate scope the number of SUP'ers and kayakers using the current hand launch boat ramp, the City should have characterized the weekday and weekend traffic. BBR has previously provided industry statistics that show the year over year continued participation growth in the SUP sport.

3. PARKING AND ACCESS A DETERRENT. While businesses like Tarsans provide new SUP'ers access to the harbor, those who own their own SUP's have limited launch options in the harbor. If an SUP'er also leases a boat slip, he or she can launch in their marina. And some businesses have provided limited private SUP storage for a monthly fee. But the vast majority have to use the current hand launch boat ramp. Today, these users can drive up to the hand launch boat ramp, drop off their equipment and park within sight of their equipment. The access road configuration is isolated from other harbor uses and precludes anyone stealing the dropped off equipment without the owner seeing the activity. Ample parking is available at the end of the access road on surface level parking. Because of the close proximity, many just carry their equipment from the parking spot to the launch point.

   The FEIR shows a configuration that represents a major deterrent to SUP'ers and kayakers. The option of parking your vehicle and carrying your equipment to the launch point is eliminated. There are limited number of nearby surface level parking spaces. And the city has not reserved these spaces for these recreational uses. Therefore it is most likely that users would have to park in parking structures. The height of SUV's with an SUP or kayak on top would likely preclude the ability to even enter the parking structure. But even if a user could, they would then have to cart their equipment through the parking structure as elevators cannot hold standard SUP's or kayaks. Parking structures are not designed for people to walk down the ramps. It would be dangerous for users as there are many blind spots and task saturation for drivers looking for a parking spot. The length of the boards and kayaks would also likely risk in regular damage to vehicles and the SUP or kayak, especially carbon fiber SUP's and kayaks. Just the distance added by negotiating the levels of the parking structure represents a

major deterrent. But then, once free of the parking structure, the user would then have to navigate through two rows of shops and restaurants, cross the new street, and multiple pedestrian/bike paths to get to the reconfigured Seaside Lagoon. Then amidst all the people and bike traffic on the pedestrian/bike esplanade, the user would have to negotiate two 90 degree turns with equipment over 9 feet long and some 14 feet or longer and go down a set of stairs to reach the beach and launch. This represents a significant risk of injury to people and damage to property, landscaping and kayaks/ SUP's.

The FEIR attempts to remedy this by providing a drop off point and some lock boxes. But the FEIR fails to describe the dimension of these lockboxes or how they would work. Are they lockers with a door and key? Lockers that would fit the length of SUP's and kayaks and the height of their skegs, decks and bow and stern rocker, would be huge. If it is not a locker, it would be difficult to secure paddles, PFD's, fishing gear, and other equipment. How many would be provided? How do the users get the locks and keys? What happens if someone "camps" in a locker – preventing its use by others. No other harbor has a locker system for users who come to launch their SUP or kayak. Without proper definition of this solution, it is impossible to evaluate its viability as a realistic solution. And without characterizing the traffic, how does the city determine how many lockers are required? Neither the CUP nor the FEIR define the number of lockers.

Even assuming the city could create and manage such a complex system, the process would deter users. It would take on the order of 10 minutes to offload a vehicle; carry all the equipment to a locker negotiating people who are shopping, dining, walking and biking; carefully load all the equipment into the locker to preclude damage to the equipment; and returning to your vehicle. The same would be true on the return trip. So the simple act of loading and offloading one's equipment from their vehicle would take 20 minutes. But now the user must find parking in the parking structure. Based on the limited parking provided (see parking section) it is likely the user would have to search the few ground level parking spots, then try the harbor parking structure, then try the

other parking structures further south. It is easily foreseeable that on a busy weekend this process and walking back to the launch point would take half an hour or more. Even more frustrating is that the user cannot find any parking space or have to pay even more for valet parking.

This represents a significant access issue that is far, far worse than the situation today. The only reasonable conclusion is that the plan described in the FEIR would be a significant impact and would serve as a deterrent to users.

4. SHARED SPACE WITH SEASIDE LAGOON USERS – Navigating beach area with playing toddlers is a danger. Creating a safe lane for departing and returning both on land and in water significantly reduces parkland and water area usable to Seaside Lagoon visitors. The beach increases the potential for sea lion interaction (see Sea Lion section). Also, the FEIR describes the Seaside Lagoon being used for events. This would preclude or significantly impact the ability of SUP'ers and kayakers to access the launch point. This situation does not exist today because the launch area and access are physically separated from the Seaside Lagoon park area.

5. COMBINATION WITH THE TRAILER BOAT LAUNCH RAMP – City staff contemplate launching kayaks and SUP's off the proposed boat ramp on Mole B. First off, this solution already suffers from insufficient parking (see Boat Ramp section). But that aside, the ramp would have to have a separate floating dock for launching and retrieving SUP's and kayaks. The floating dock height for boats is too high for safely launching kayaks. Floating docks designed for kayak and SUP launching are closer to the water to facility save boarding and offloading. Launching by walking down the concrete ramp itself is dangerous as the ramps quickly become too slick for safe footing. Also, SUP's and kayaks "beaching" or launching from a concrete ramp would be easily damaged. Launching beside a trailer boat ramp is dangerous. The proximity to task saturated boaters trying to launch or retrieve their vessel is dangerous. Kayakers in particular sit

close to the water and may not be visible. Boaters waiting for a chance to return will jockey for position in waters just outside the launch creating further risk of collision. Jet skis are known for their poor handling at low speeds. And in the case of Mole B, the blind spot created by the Galveston wall combined with boat ramp traffic and normal Basin 1 traffic all represent significant danger to any kayaker or SUPer using the facility. This is a deterrent and hazard in general but especially to families who want to kayak or SUP together.

6. SUMMARY – The following table summarizes the assessment of attributes of the human powered watercraft launch solutions proposed in the FEIR. In summary, the solutions proposed increase hazards and are a significant deterrent to SUP'ers and kayakers. Compared to the situation today, the FEIR proposals represent a SIGNIFICANT IMPACT to use of the harbor for SUP'ers, kayakers, and users of other types of human powered watercraft.

| Solution Attribute | Assessment | Comparison to current situation |
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| **Park in parking structure** | Deterrent – distance, time, potential lack of parking or use of valet. | Significant impact |
| **SUP/Kayak Locker** | Unproven, lack of detail, number not specified, dubious viability, deterrent | Significant impact |
| **Access** | Dangerous – length of SUPs/ kayaks, negotiating roads, walkways, 90 degree turns and stairs risks injury to people and damage to equipment and facilities.<br><br>Awkward to maneuver.<br><br>Deterrent. | Significant impact |

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| **Shared Beach** | Potential hazard to toddlers.<br>Reduction in usable beach and water area.<br>Increased risk of sea lion interaction.<br>Events will inhibit or prevent access.<br>Deterrent. | Significant Impact |
| **Combination with trailer boat ramp** | Insufficient parking<br>Dangerous solution<br>Deterrent. | Significant Impact |

## SEASIDE LAGOON

The FEIR continues to ignore city documents that define the unique attraction of the current configuration of Seaside Lagoon and the deterrents and impacts represented by the proposed configuration.

1. UNIQUE ATTRACTION FEATURES ELIMINATED - BBR has previous provided references to City documents that highlight the unique attributes of the current Seaside Lagoon. The sand bottomed salt water pool combined with the sand beach, play fountains, and sliding boards provide a toddler friendly environment – constant water depth with roped in wading areas, lifeguards surrounding all sides of the pool, play fountains in the pool for kids to play in, fenced-in safe environment, concession window for food from Ruby's at the outer boundary of the park. The fenced in park provides security for children, keeps children from wandering off, limits stranger access to children, and allows control for events without impacting use of the hand launch boat ramp.

   In addition to previously submitted evidence of the unique attributes of Seaside Lagoon, a November 20,2007 City Staff Administrative Report entitled "Seaside Lagoon Operation

and Facility Planning" calls the Lagoon a "uniquely designed recreational aquatic park".

The proposed solution eliminates these attributes. City staff have admitted the childrens' day camps will not likely survive the reconfiguration. Tidal changes preclude the definition of a safe wading area for toddlers. Access for lifeguards is limited to one side of the swim feature. Toddlers playing next to and around breakwater rocks bordering the beach and swim area creates new risks and hazards. The elimination of fencing prevents the use for private parties and creates interference between public events and the launching of SUP's and kayaks.

***The elimination of the very elements that make Seaside Lagoon unique would reduce the attractiveness to current users. It is reasonable to conclude that attendance would drop dramatically.***

2. HARBOR WATER QUALITY – The current Seaside Lagoon is treated with chlorine, designed to meet public pool standards, filtering total water volume 6x per day, and tested to meet public pool standards. The city failed to perform water quality testing of the harbor in the proposed Seaside Lagoon area. Instead the city relied on data from water testing south of the pier. BBR and the City provided evidence that these waters fail water quality testing over 25% of the time in both dry and wet weather conditions. The most recent Heal the Bay Beach Report Card rated these waters an F and it made the "Beach Bummer" list. The city states this is because of a specific outflow condition from the Hyperion plant, but Heal the Bay clearly states this as a possible cause. There is no conclusive analysis to support this conclusion. In fact, as submitted previously, these waters have failed in previous years without the referenced outfall condition.

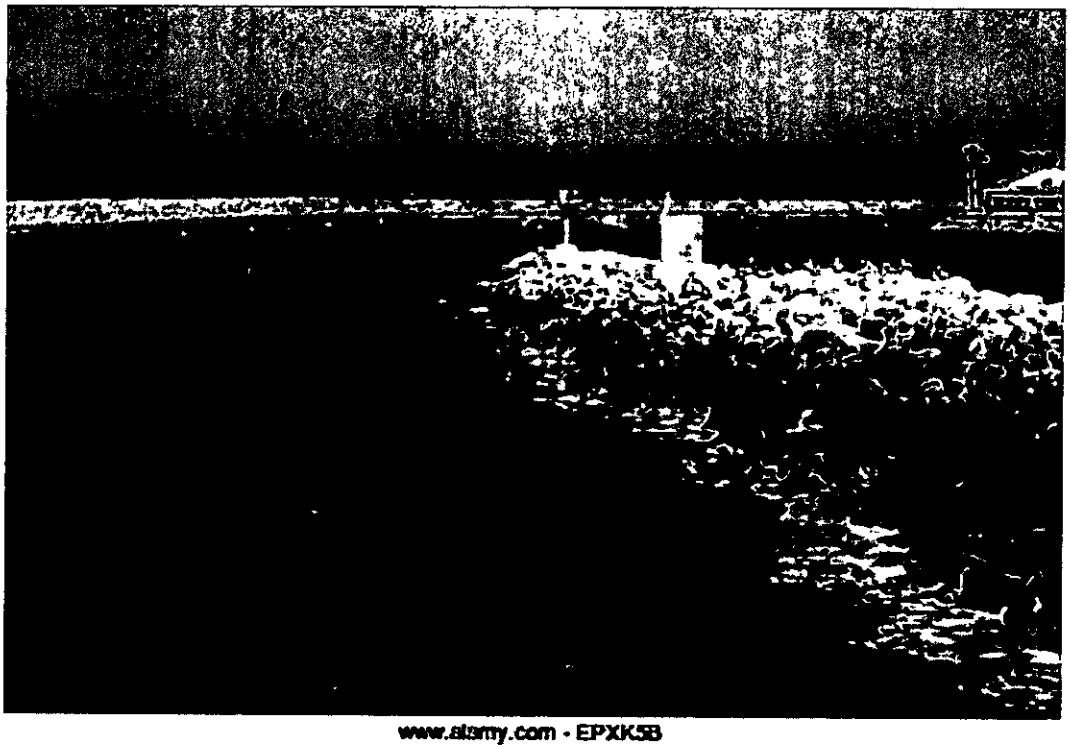
The City responded to DEIR comments by BBR by performing water quality testing on a single day in April at a point near the proposed swim area.. Clearly a single data point on a single day is insufficient to conclude or even speculate the prevailing water quality of

the harbor swim location. Wind conditions and direction, water temperature, sea state, boating activity, amount of daylight, air temperature, presence of sea lions – all these variables affect pathogenic activities in harbor waters. It would take several years of data to be able to accurately assess the suitability of harbor waters for toddlers and swimmers. Toddlers are specifically more susceptible to water born pathogens. Any parent concerned about the health of their children would be deterred by the untreated harbor waters compared to the treated waters of the current Seaside Lagoon.

The city and CenterCal advertise that the proposed swim area will be "flushed" by tidal action every 48 hours. Firstly, that hardly compares to treated waters that are recirculated, filtered and chlorinated six times per day. Secondly, that "flushing" analysis assumes a non-biological contaminant released in the harbor that is not present outside the harbor. Biological pathogens breed. So the contaminant is not a fixed amount in this case. In the right conditions pathogens multiply rapidly. And if the ocean waters contain these same pathogens no amount of tidal action would result in a change in pathogen contamination of the swim area. City provided data shows the waters outside the harbor suffer from poor water quality over 25% of the time. Data previously provided by BBR shows water quality north of the harbor failing 25% of the time. Again these exceedances occurred in both wet and dry weather conditions.

While the city uses the excuse that preventing runoff from the harbor parking area would reduce pollution, that would only affect wet season events, when it is unlikley the area would be used by swimmers anyway. The city ignores other sources of contamination: boating activities; sea lion, birds and sea life defecating, and garbage being blown in by the prevailing winds. The city explains that the large number of birds at the pier may affect the water quality south of the pier (the test data originally provided by the city), but they neglect that the harbor breakwalls attract many more birds. In face many birds roost on the breakwaters. And tides and rains wash that excrement into the harbor waters. The city is silent on the failures north of the harbor. The city does try to compare our harbor with Dana Point that generally has better water quality than Cabrillo or MDR

internal beaches, but Dana Points Baby Beach is much bigger, much more open and is not in close proximity to main channel boating traffic, a fishing pier, and a sea lion barge. In fact Heal the Bay advises families to avoid beaches in enclosed waters including harbors.




Birds roosting on breakwall. Guano evident on breakwall rocks. Rains, surge, waves wash guano into harbor waters.

The city has made statements about the porosity of the harbor breakwall helping the cleansing action, but it is just as likely the rocks are a source of pathogens that would decrease water quality.

***The city has known its plan to open Seaside Lagoon for years, but failed to perform any water quality testing until BBR commented on the DEIR. The city cannot demonstrate that the proposed solution is as safe as the current Seaside***

***Lagoon conditions because it failed to do the proper testing and analysis. The city offers speculation not evidence.***

3. YEAR ROUND OPENING – The City advertises that the opening of the Seaside Lagoon year round would increase the use of the park. This conclusion is not supported by evidence. BBR previously provided City provided attendance data for Seaside Lagoon. The data clearly showed a dramatic drop off in attendance at the beginning and end of the season. Dropping air temperatures, increases in mid day wind velocity, lower water temperatures and school activities all contribute to reduced usage during the fall, winter, and spring months. The city opines that parents may take their kids to wade during warm offseason days. This ignores the demands of the school year and deterrent represented by cold water temps and offseason wind velocities. The City also concludes parents may take their kids to just play on the beach, but they can do this today on any beach in the SouthBay. The city even contradicts itself... In its response to the harbor water quality issue the city responds " lagoon users are less likely to engage in swimming in wet winter months." If the Seaside Lagoon were a big attraction in the off season, the city could open it year round or for extended season. The fact that the city has not extended the Seaside Lagoon season demonstrates that off season demand is low. Attempts to open the park for attractions such as ice skating have failed as well. There is no evidence that opening the Seaside Lagoon year round would make up for the lack of amenities that make the Seaside Lagoon unique and attractive to nearly 100,000 total users per year today.

As for SUP'er and kayaker access, these users already have year round access. When the small craft hand launch dock is removed for repair in the winter, SUPers and Kayakers use the asphalt path into the water in the immediate vicinity of the hand launch boat ramp or they use the boat hoist dock to launch. Opening up Seaside Lagoon year round does not represent an increase in access for SUPers/kayakers because they have

year round access today. ***As discussed in the Human Powered Watercraft section, the proposed project will actually have a detrimental and significant impact to access, safety and use by SUP'ers and kayakers.***

4. REDUCTION IN USABLE PARK SIZE – The proposed reconfiguration of Seaside Lagoon dramatically reduces the usable public open space in the park. One third of the current park footprint is paved over with a new access road for the CenterCal development, a few surface level parking spaces, the pedestrian esplanade, and new structures. The new road and parking represent a zoning violation unless the road and parking are dedicated to the park uses. Likewise the loss in space to "concessions" is a violation unless those concessions are primarily dedicated to serve the park uses. Added to this hard reduction is the impact of tides. The usable area of the park will be defined by the high tide line. Sand below this level will remain wet and be undesirable for a family to use as their spot on the beach. BBR provided city provided data on Seaside Lagoon attendance. This showed peak weeks average over 1300 Seaside Lagoon guests per day. While the city failed to produced daily use data, weekend use on these peak weeks would clearly surpass this number of guests. ***The reduction in usable grass and beach space significantly impacts the ability of the park to serve the current peak number of families and reduces the attractiveness to current users. The only reasonable conclusion is that the use of Seaside Lagoon by families with toddlers and other children will decrease in the proposed configuration.***

   In fact, history shows that the city has been reducing the side of Seaside Lagoon for quite some time. An August 19, 2003 Staff Report entitled "Approval of New Lead and All Related Documents Between the City of Redondo Beah and MCC Redondo Beach II LLC for the Leashold at Redondo Beach Marina" clearly shows that the city allocated 2.5 acres for parking for Seaside Lagoon Park:

*"In exchange for operating the hoist, Redondo Beach Marina also operates the 2 ½ acre Seaside Lagoon parking lot, collects the revenues and absorbs the expenditures associated with the lot and the hoist."*

The lease agreement included with the staff report clearly states:

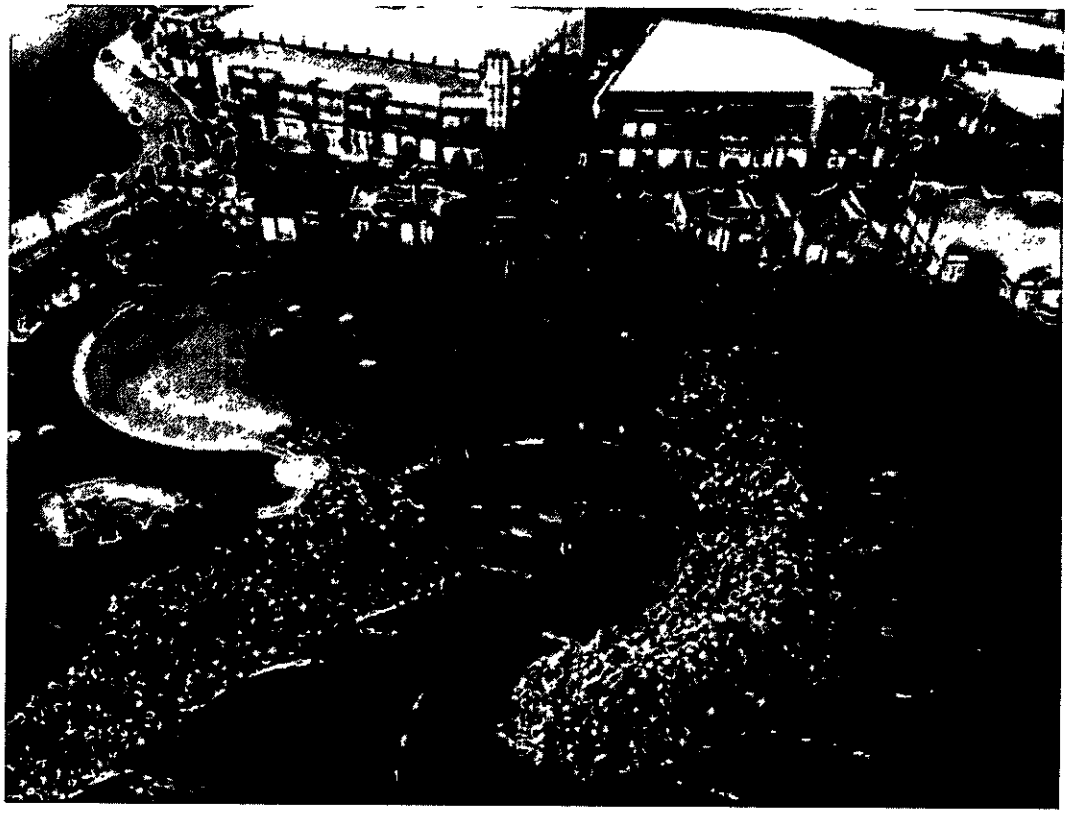
*"C. Adjacent to the Leased Premises is a parcel of land (the "Adjacent Land") that is used for parking, including parking for the boat hoist and the recreational area known as the "Seaside Lagoon."*

In fact, the agreement demonstrates that even back in 2003, the city realized parking would get saturated in the Harbor area:

*"In order to provide additional parking for Seaside Lagoon, MCC will cooperate with the City in developing a plan to use the Triton Oil site as overflow parking for Seaside Lagoon and other nearby uses."*

This demonstrates that the parking for Seaside Lagoon was specifically setaside outside the park security fence. Thus the paving over of the usable park area in the proposed plan represents a much more substantive decrease in the land area set aside for this recreational use than just the park boundary. **The actual loss in total park area, parking AND usable public open space is closer to 3.5 acres out of a total of 5.5 acres – a 64% loss in space allocated to Seaside Lagoon.** In fact, it shows that the city recognized the 2.5 acres of parking was insufficient and that they were exploring overflow parking nearby.

5. USABLE WATER AREA - Today Seaside Lagoon is predominantly an attraction for families with children. Adults primarily use the waters to play with their children. The Seaside Lagoon is not designed as a lap pool. Toddlers are confined to wading areas that are consistently the same depth and are clearly marked by ropes and floats. Older children with the ability to swim can play in the deeper waters and use the water slides.



BBR previously provided an analysis of the usable water area assuming swimming would be prohibited outside the small breakwater protecting this area of the harbor from direct wave action. The city says the BBR analysis did not include the width of the breakwall that would be eliminate, however, BBR did include this added area in the analysis.

The reconfigured swim area described in the DEIR cannot define a safe wading are for

toddlers due to changing tides and surge conditions. And the proximity of breakwater rocks presents an additional hazard to toddlers. While toddlers today enjoy wading depths over more than 3/4ths of the perimeter of the current pool, in the proposed configuration, toddlers could only access one side of the swim area safely. If an area is roped off for SUP/kayak access to provide a safe demarcation from toddlers, this usable swim area is reduced even further. The elimination of slides and interactive water fountains reduces the attractiveness of the swim area to both toddlers and older children. Indeed, CenterCal's model of their development shows how small the wading actually would be and the proximity to dangerous breakwall rocks. The sandy beach area is approximately the same size as the current Lagoon pool. Clearly the wading area and swim area are much reduced in area and volume.

While adult swimmers may choose to swim in the harbor from this point, swimming outside the small enclosing breakwater represents a real hazard to the swimmer. Swimmers are not very visible to boaters and outside the small breakwater, the swimmer will be in well used navigable waterways. We find it it doubtful the Harbor Patrol would allow any appreciable swim area. It would be far, far safer for an adult swimmer wanting to swim for a workout to enter off a beach and swim just outside the surf line. That is exactly what open water swimmers do today. It is extremely unlikely adults who frequently swim in open waters for their work out would change their behavior and swim to and from the Seaside Lagoon. And if any do, they will not be great in number.

Therefore, it is reasonable to conclude any swimmers would be confined to the small enclosing breakwater. Tidal action will significantly impact the usable depth of even this small area. As BBR previously submitted, this depth will also be subject to silting. The current hand launch boat ramp area has been silting in for years. On low tides people can now walk to the hand launch boat ramp from the shore. And while the city claims otherwise surge and rain runoff will move beach sand into the swim area. There is no

feature designed into the project to prevent this erosion over time. The proposed beach is heavily sloped. When it rains or when harbor waters surge onto the beach, the beach sands will erode into the swim area. So dredging the small swim area will only grow smaller and smaller with each year.

***The design of the proposed swim area reduces the usable area for those who use the current Seaside Lagoon the most and reduces its attractiveness due to loss of play amenities and increase in hazards. It is extremely unlikely that the loss of these users would be replaced by open water swimmers. The only reasonable conclusion is that the design proposed will decrease the use of the swim feature.***

6. SUMMARY – The following table summarizes the proposed attribute of the Seaside Lagoon Reconfiguration, the assessment of that attribute, and the comparison to the current configuration. The only reasonable conclusion is thatUn the proposed reconfiguration will reduce the family use of this area by eliminating the very attributes that make the current Seaside Lagoon unique and attractive to families with small kids and by reducing its usable size overall. Furthermore, the city has presented no evidence that the harbor waters are safe for toddlers and adults during the peak summer months. Indeed the only data presented in this process. would reasonably force the conclusion that the facility would be closed over 25% of the time . While the new configuration may provide a spot for CenterCal to host its promotional activities, the residents of California will lose a unique and well attended regional family attraction that provides a safe stepping stone for kids to migrate to recreation in beach waters.

| Attribute | Assessment | Comparison to Current Conditions |
|---|---|---|

| | | |
|---|---|---|
| **Unique attributes eliminated** | Elimination of sand bottomed salt water pool, fountains and slides decreases attractiveness.<br><br>Elimination of fence reduces attractiveness due to risks of children wandering off and more exposure to strangers.<br><br>Deterrent | Significant impact |
| **Harbor water quality is unknown** | The city has provided no evidence that harbor waters are safe to swim in. One day of testing on an off season day is insufficient to draw conclusions. Data provided by the city only supports conclusion that feature would closed 25% or more of the time.<br><br>Deterrent | Water quality is known. Water is treated. Water volume is circulated 6x per day.<br><br>Significant Impact |
| **Year round opening** | No increase in access for SUP/Kayak users<br>Evidence shows little demand on offseason. | Year round access currently not provided due to lack of demand.. |
| **Reduction is usable park size** | Usable land area size substantially reduced due to development and tidal changes.<br><br>Deterrent | Significant impact.<br>Violation of zoning. |

| | | |
|---|---|---|
| **Reduction in usable water area** | Toddler wading area variable and reduced substantially<br><br>Hazards increased by tidal depth changes, surge, and exposure to sea wall and breakwater rocks.<br><br>Silting and erosion will further reduce swim area without dredging.<br><br>Deterrent | Significant impact. |

## WATERFRONT PARKING

The city response to waterfront parking concerns basically attempt to explain away their current plan rather than address the substantiated concerns submitted by BBR and others.

1. SIZE AND LOCATION OF PARKING STRUCTURES – The city attempts to justify location of the parking structure at Beryl and Harbor. It fails to address the configuration and location that force the new road and surface parking to pave over a substantial portion of Seaside Lagoon Park. ***Relocation and/or reconfiguration could have preserved the park in its entirety.***

2. PARKING FOR RECREATIONAL USERS – The city attempts to explain away why recreational uses are not included in the parking demand numbers. Primarily, the city says the parking demand numbers for other uses would account for the parking needed by recreational users. This is a false conclusion. Firstly, not all recreational users patronize the other uses. People going to Seaside Lagoon today regularly pack their

lunches and even the city admits in her EIR text that they bring their own coolers. People coming in after work to get in an SUP workout do not frequently stop by and get a drink at another harbor business. Secondly, if anything, any recreational users that frequent the other businesses, should INCREASE the parking required for those businesses. But this approach is just as faulty. Thirdly the number of people per vehicle is dependent on the primary purpose for the visit, not a secondary or tertiary purpose.

***The parking demand be reaccomplished to include recreational uses. Parking should be based on the primary purpose for the visit. And then some of that may be decremented based on some evaluation of a dual purpose visit***

Most SUP'ers working out after work will come one per vehicle. Seaside Lagoon users would have a higher per car factor. A November 20, 2007 staff report entitled " Seaside Lagoon Operation and Facility Planning" states:

*"Parking for the facility is available in an adjacent 2.25 acre lot that is owned by the City, but operated privately by the Redondo Beach Marina Leaseholder, and contains 207 spaces for cars...."*

Previous staff reports cited in the Seaside Lagoon section of this report, shows that the city considered the 2.5 acres east of Seaside Lagoon was allocated as Seaside Lagoon parking.

Likewise the City's lease with MarVentures specified the number of parking spaces for commercial boats and recreational boaters in Basin 3. From the August 19th, 2003 staff report entitled "Approval of a New Lease for Redondo Beach Marina":"

*"MCC would allocate on a non-exclusive basis, 110 parking spaces to maritime*

*operations. (60 for sport fishing, etc. and 50 for slips) as well as space for showers/ lockers and sport fishing sales."*

These numbers coincide with BBR estimates for parking demand for recreational uses:

| Parking Generator | # per day | Max (boats) | Peak concurrent | People/car | Concurrent Parking Allocation |
|---|---|---|---|---|---|
| Voyager | 2 | 125 | 120 | 2.5 | 48 |
| Indian | Varies | 24 | 15 | 2 | 8 |
| Betty G | Varies | 10 | 7 | 2 | 4 |
| Highliner | Varies | 10 | 7 | 2 | 4 |
| | | | | | |
| SUP's | | 75 | 25 | 1.25 | 20 |
| Kayakers | | 25 | 12.5 | 1.25 | 10 |
| | | | | | |
| Seaside Lagoon | | 1500 | 750 | 3 | 250 |
| | | | | | |
| Monstad Fishing | | 20 | 20 | 1.5 | 13 |
| Sportfishing Pier Fishing | | 10 | 10 | 1.5 | 7 |
| | | | | | |
| Beach/Other | | 150 | 150 | 4 | 38 |
| Board House | | 15 | 15 | 1.25 | 12 |
| TOTAL: | | 1964 | 1131.5 | | 412 |

These numbers should be incremented to account for growth in these activities based on the expected population growth for the region.

The city falsely states that current parking is largely vacant and that only three weekends per year is parking saturated. BBR has provided photographic evidence that parking has a much higher use rate that the city admits. While we agree most weekdays have a lower parking utilization rate, nice weekends throughout the year generate utility rates that are much closer to capacity than indicated by the city. And during summer months nearly every summer weekend results in very high parking utilization in the harbor and pier. In fact on social media one resident commented that she had to abort an

anniversary dinner at Kinkaids as they spent 40 minutes looking for nearby parking. They got stuck in the parking structure line ups for others looking for parking.

As to access for the recreational uses, the City fails to accurately portray the conditions. It is true that today kayakers and SUP'ers who drop off their equipment at the hand launch boat ramp must park some distance away, but the city fails to assess that the access road is not a through road. It has one entrance and exit point that the owner of the dropped off equipment has in view at all times. This road is used almost exclusively for users of the small hand launch boat ramp. And the equipment is dropped off on the actual dock – it is not in the way of pedestrians, bicyclists and joggers who also use the path for access. These attributes are not repeated in the CenterCal project. The drop off point is two way road used by all visitor to the mall. While the owner is off looking for parking, anyone could stop throw the equipment on their roof rack or the bed of their truck and make off without the owner ever seeing the crime. And there is the added risk of a kid or other pedestrian tripping over, stepping on or otherwise accidentally or maliciously damaging the equipment. While the EIR discusses a locker system, there is no description as to number, configuration or management of the limited number of lockers.

Today, recreational users can park immediately adjacent to their intended use. In the EIR project description, users may have to park up to a quarter mile away in a parking structure and have to negotiate streets crossings, pedestrian traffic, bike traffic and shops and restaurants to reach their recreational activity. ***Any reasonable assessment that would conclude the parking configuration represents a significant impact to recreational, coastal dependent uses of the waterfront.***

3. PARKING FOR THE BOAT LAUNCH RAMP – The city continues to use its data on the current boat hoists to justify a ridiculously low number of parking spaces for the new boat

ramp. Multiple residents have testified that they do not use the boat hoists for a variety of reasons including the reliance on a hoist operator, limited hours of operation, and vessels that are not made to regularly hoist. If the Coastal Commission felt the hoists were not a deterrent, why do they require a ramp in the first place?

The city continually relies on long term averages to justify its choices. Staff have admitted they know peak uses are much higher. In fact that city has that data to show the fallacy of their justification. Another averaging fallacy the city uses is taking the number of lanes of boat launch facility and dividing it by the number of launches per day. While this may be a valid way to justify how many boat ramps you need, the city then twists this data to justify number of parking spaces per ramp. So if there were 10 launches per day in a facility with 10 ramps, the city would erroneously conclude that that only 1 parking space per lane is required. The two are independent variables. The total number of launches not the total number of lanes should be the indicator of parking demand.

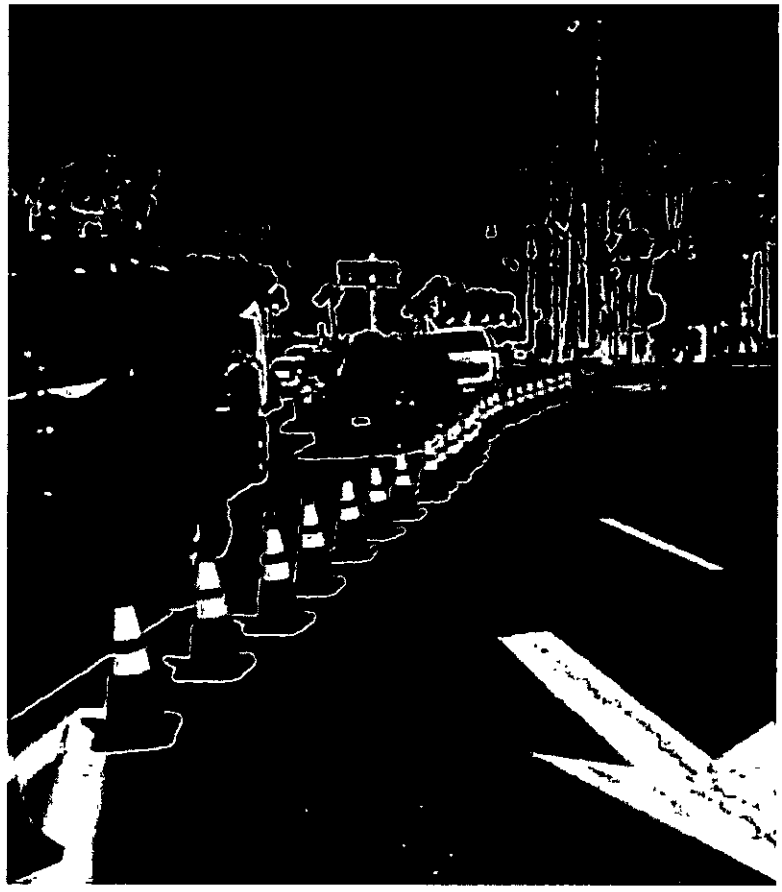
Data provided by the city on boat ramp utilization rates show weekend traffic rates throughout the year are significantly higher than the city concludes. It is reasonable to assume that due to a midpoint location between MDR and Cabrillo Boat Ramp, Redondo's boat ramp can expect to attract about a third of the current traffic from each side and add the unserved users who reside in close proximity to King Harbor. In fact, because Redondo is much closer to Catalina, to prime fishing grounds off Palos Verdes and the spectacular views of PV's coastline, Redondo would capture a larger share of MDR traffic. It is also likely that the convenience of a nearby boat launch ramp would incentivize more nearby residents to buy a trailer boat or jet ski, who otherwise would not have due to the distance and traffic to get to Cabrillo or Marina Del Rey. As provided earlier, the boating industry is showing an increase in sales. And finally, the region still is experiencing population growth that has accelerated with the reversal of the economic

downturn. When you combine the convenience, the population growth, the boating industry's increased sales and the recover of the economy, it is only prudent to provide more parking to accommodate the foreseeable growth. Instead, the city is providing less than the minimum of the minimum range defined in California Department of Boating and Waterways Guidelines and uses misleading and inaccurate averaging techniques to justify it. And to add insult to injury, they are calling this parking shared with other boating uses that would peak at the same time.

A more appropriate assessment and determination of parking requirements was conducted by Dana Point for their harbor revitalization. Determination of parking was based on peak uses not average. Redondo should do the same.

***Currently City zoning requires 67 double length parking spots for the boat hoists. The city kept this in the zoning that went before the voters and the Coastal Commission. To cut that by more than a third while building a boat ramp that is designed to attract more users is contrary to the goal of installing a boat ramp. As a minimum, the City should require 30 trailer spaces per lane and meet the guidelines for guest parking as well.***

4. TOTAL PARKING FOR THE PROPOSED PROJECT – The city admits that the project does not meet RBMC individual parking standards. It then misleadingly compares to off season weekday utilization statistics. By the city's assessment, nearly every harbor in the US would have an excess of parking spaces. But again BBR previously provided photographic evidence that the parking lot utilization on weekends – even winter weekends exceeds that the city would have us believe in the EIR. So then the city uses ULI data to conveniently declare that a parking deficit has turned into a parking surplus. The city wrongly uses time of day assessments and misapplied them. For example, the city concludes recreational uses do not peak at the same time as other uses. That is not



supported by the actual peak uses in our harbor. Recreational uses peak in the hours after work during weekdays and at mid day on weekends. The same peaks of most of the other uses described in the project. The fact of the matter is, if the development is successful, the parking required to serve the commercial uses during summer weekends combined with unaccounted for recreational uses during a summer weekend will more than saturate the parking. We see at or near capacity conditions today on summer weekends. This project doubles commercial development while only increasing parking by 7%. Unless the proposed development dramatically underperforms, there is no way to reasonably draw the conclusion that the parking provided by the project is sufficient for all users. The CUP proposed allows CenterCal to define large blocks of this already limited parking for valet parking, which will only further exacerbate the parking shortage.

The City responds to the comment about the lack of any assessment of recreational

parking demand by stating the demand is accounted for by the commercial development. This is a laughable response. The beach area of Redondo experiences overflow conditions every summer weekend. Yet there is not one commercial use on the beach. The fact of the matter is the harbor and its recreational uses would have a substantial demand without any commercial development. But the city fails to attribute a single parking space for any recreational uses.

BBR has previously presented pictorial evidence of harbor and pier parking on non-holiday weekends exceeding City claims of excess parking capacity. Here is an additional picture evidencing the demand for parking without the increased development:

## BOAT RAMP

The Final EIR text is confusing as it contradicts itself. In the project description, the table indicates that the boat ramp would be in an unnamed location in the Turn Basin, which would mean Mole C or D. But the Staff Recommended Alternative concludes Mole B is the best location for the ramp. But staff has already introduced new changes since the release of the final EIR and now advocates separating the Boat Ramp location and evaluation from the Project EIR. Regardless, the location of the boat ramp is critical to the "Waterfront" project. Whether it is included in the project area or elsewhere in the harbor, the zoning requires a boat ramp, the location of the boat ramp has significant impacts on access, circulation, recreation, and coastal dependent uses no matter where it is placed.

Staff's recommendation ignores their own staff reports on EIR proceedings which clearly state the assessment of Boat Ramp location is critical a

***Finalizing the CenterCal Waterfront project EIR and entitlements without first finalizing the boat ramp location could result in suboptimal boat ramp placement, public hazards and increased impacts to coastal dependent recreational commercial use. This EIR***

***cannot and should not be finalized or approved without a thorough vetting of final placement in the analysis of impacts and the public input. The public cannot assess the impacts of the Waterfront EIR without knowing the end solution for the location and broad configuration of the boat ramp.***

***Additionally, the City's inability to close on a solution for the boat ramp demonstrates it is prioritizing the non-coastal dependent uses proposed by CenterCal over the best location for this coastal dependent use. Every public discussion of the boat ramp resulted in the turn basin, Moles C or D as the ideal location for access, parking, safety, and proximity to the harbor entrance. But to build these solutions right would impact CenterCal's proposed development. BBR maintains the optimal boat ramp placement configuration and size should be designed first and the rest of the project should be built around it. This is a harbor. Harbor uses should come first.***

It is also important to note that prior to the whole CenterCal project, City Staff, Harbor Commissioners and representatives of the boating community concluded that Mole D was the best site for a boat ramp of all sites in the harbor. According to the August 30, 2007 article in the Beach Reporter entitled "City studies feasibility of building a new public boat ramp", by Sascha Bush:

*"For several years, the city has been actively evaluating several sites within King Harbor to locate the best possible site for a public-access boat launch ramp. The Harbor Area Working Group – a committee made up of two council members, city staff, and boaters – had identified the side at Mole D as havinG the most potential development of the ramp. The location provides the most convenient in/out water access, offers more space for watercraft to maneuver safely without creatinG excess traffic and compared to other sites in the harbor it enjoys the most shelter from the existing breakwater."*

1. MOLE B BOAT RAMP LOCATION – The Mole B location for the boat ramp is a new and major change to the DEIR. Mole B was rejected in the DIER and recently proposed

configuration was never fully vetted in the CEQA process. This alternative, unless withdrawn, demands the recirculation of the DEIR with this option more throughly vetted, described and analyzed.

While the city conveniently removed the helipad requirement to squeeze in all the uses they intend to pack into Mole B, the City Council conclusion on the Mole B Master Plan directed city staff to include the helipad. City Harbor/Fire Officials argued its necessity from a public safety perspective. On July 5th, 2011, the City Council approved a Mole B Master Plan that included a helipad. Just recently, a SCUBA diver suffering from the bends was brought to Mole B to be helicoptered to they hyperbaric chamber on Catalina. From The Beach Reporter:

"Man airlifted to Catalina Island after diving injury in King Harbor

Megan Barnes Jul 6, 2016

A man injured while diving in Redondo Beach's King Harbor was airlifted to Catalina Island for treatment in a hyperbaric chamber Wednesday afternoon, authorities said.

Redondo Beach Baywatch lifeguards responded at about 12:15 p m. to a 9-1-1 call of a man with "dive-related injuries," said Los Angeles County Lifeguards spokeswoman Lidia Barillas. Further details were not available.

Hyperbaric chambers are used to treat decompression sickness—or "the bends"—a condition in which scuba divers who ascend too quickly after prolonged exposure to water pressure experience pain from nitrogen causing bubbles in their blood.

Barillas said she did not know what the man's specific injuries were. His name was not released.

Redondo Beach Harbor Patrol, firefighters and Los Angeles County sheriff's deputies also responded to the incident, picking the injured diver up at Moonstone Park, an outcropping that separates two King Harbor boat basins."

In addition to the loss of the helipad, trailer boats and other traffic blocking the incoming and outgoing lanes of the Mole due to overflowing traffic would block Fire Department ingress and

egress to and from the Harbor Patrol station on Mole B. It is clear, that the location of a boat ramp on Mole B would jeopardize first responder response times.

King Harbor boaters have separately provided a litany of concerns based on the surprise assessment of yet another Mole B solution. These include blind spots created by the galveston wall, the narrow heavily trafficked fairway, the proximity to numerous main fairway activities, the limited parking and parking conflicts with existing uses, limited space and conflicts associated with returning boaters circling in the main and Basin 1 fairways while awaiting their turn to dock, and the large boats across the narrow fairway backing out into the boat ramp area.

Harbor boater representatives and Lanakila Outrigger Canoe Club requested a workshop on the Mole B location due to surprise changes from the DEIR and continuing changes to the proposed configuration. The City refused, but Councilman Bill Brand offered his monthly community meeting as a venue to discuss the City's recommendation. The Assistant City Manager and Harbor Economic Director attended a standing room only meeting in a 120 seat conference room. Resident Sheila Lamb volunteered to take minutes, since the city refused to send clerical staff. BBR has scanned in those raw minutes and will submit them separately. The testimony overwhelmingly opposed the Mole B location. Substantive concerns mainly concerned inadequate parking, safety, and inability of the Outrigger Club to continue operations. Lanakila provided a very informative video that demonstrated the space needed to move their outrigger canoes both into the harbor and out of parking area to participate in offsite competitions. The video also demonstrated parking demand that largely filled the area targeted for trailer parking. Testimony from current and former lifeguards and a former harbor master from Marina Del Rey highlighted the safety concerns with this location – site lines, cross winds, narrow fairway, lack of adequate queueing space, heavy traffic, proximity to large boats, and long transit to the harbor entrance. The former Marina Del Rey harbor master attested that Marina Del Rey explored moving their boat ramp to the end of a well used fairway and that solution was abandoned for safety reasons. This event is well documented in numerous newspaper articles. This testimony by well qualified attendees contradicts City staff's stated findings of their consultant.

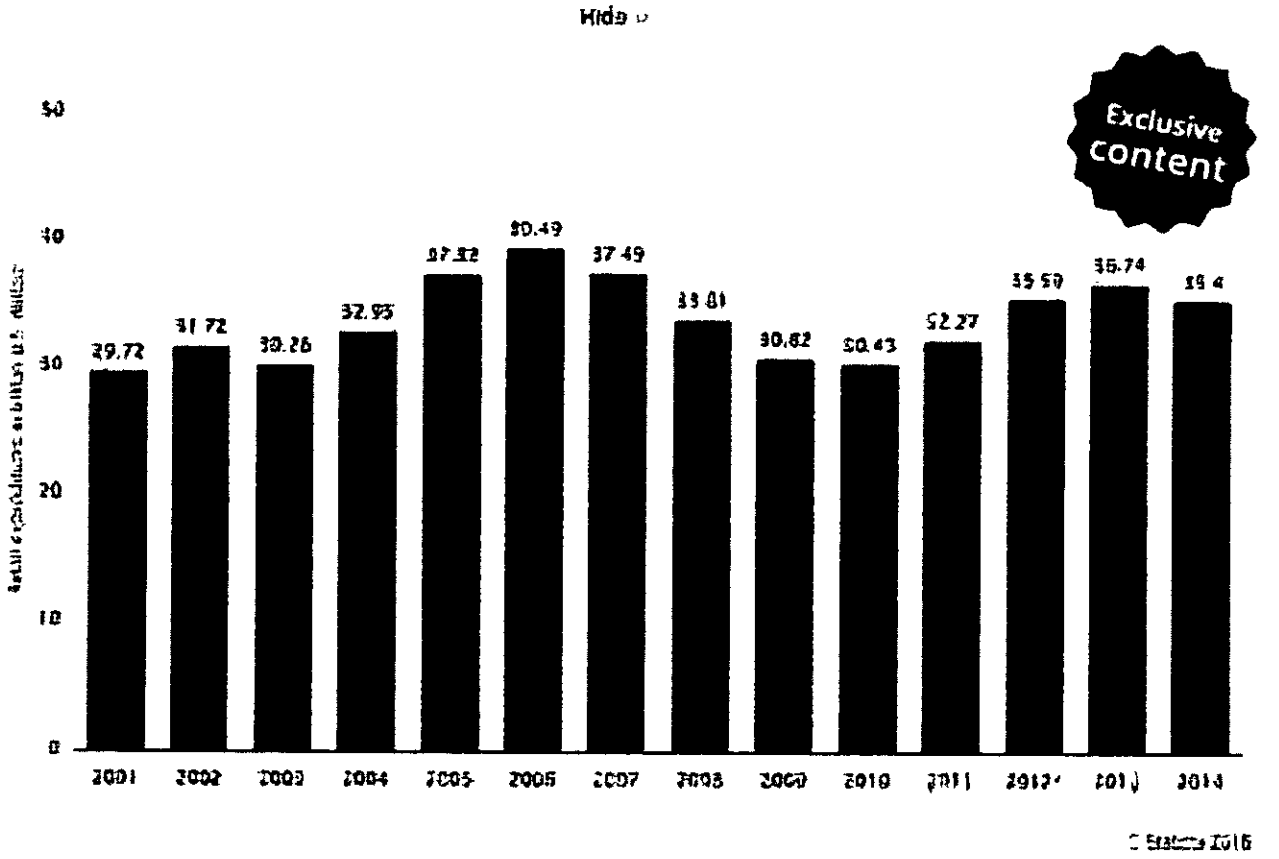
Staff's proposed solution eliminates up to 36 boat slips that are currently occupied by recreational and commercial vessels. The city states that the boats would be moved to other currently vacant boat slips, but the city has failed to demonstrate that the number of vacant slips are adequately sized to accommodate the displaced boat, several of which are amongst the largest boats in the harbor. Calls to the King Harbor marinas reveals no vacancies for large

**Retail volume of the recreational boating market in the United States from 2001 to 2014 (in billion U.S. dollars)**

This statistic shows the retail volume of the recreational boating market in the United States from 2001 to 2014. Total expenditures in the recreational boating market reached 32.27 billion U.S. dollars in 2011.

The recreational boating market includes sales of new and pre-owned outboard boats, outboard engines, boat trailers, inboard boats, ski and wakeboard boats, cruisers, sterndrive boats, canoes, kayaks, inflatables, personal watercrafts, jet boats, houseboats, and sailboats. Also included in the total market sales are accessory aftermarket sales and other related sales such as fuel, finance, insurance, docking and maintenance.

More statistics and facts on recreational boating



slips and little vacancy in the medium slip sizes. This impact would be exacerbated by City's stated intent to move the large commercial vessels out of Basin 1 to mitigate impacts of the proposed pedestrian bridge. The solution ignores the fact that the vacancies that do exist today are a result of the recession. Prior to the recession 40 foot slips were on a 10 year and over waiting list by all the marinas. In fact one, refused to add any more people to the waiting list. Staff now states that they don't see demand for slips or trailer boating increasing, but that is contrary to boating industry performance.

Statistica, a Company that researches industry trends and sells the data, shows that the industry is recovering from a low new boat sales revenue in 2010 recovering through 2014.

According to "Boating Industry" Magazine, a December 30, 2015 article by Jonathan Sweet entitled " 2016 Boating Industry Forecast", the outlook for the boat manufacturer sales will continue to improve on 2014 and 2015 sales increases.

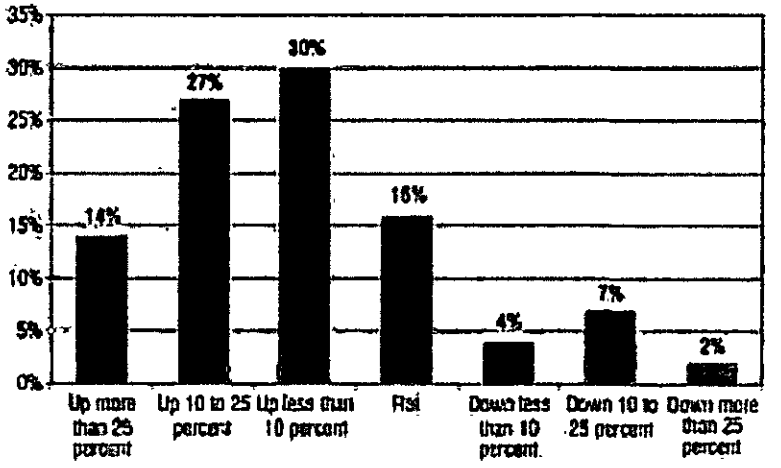
*"Industry estimates put 2015 unit growth in the high single-digit percentage range, with similar numbers expected for next year.*

*'2015 is going to go into the book as a pretty good year... And as we look at 2016, we're looking at another strong year,' said Thom Dammrich, president of the National Marine Manufacturers Association.*

*Many of the broader economic indicators are healthy which is helping the industry recover from the downturn."*

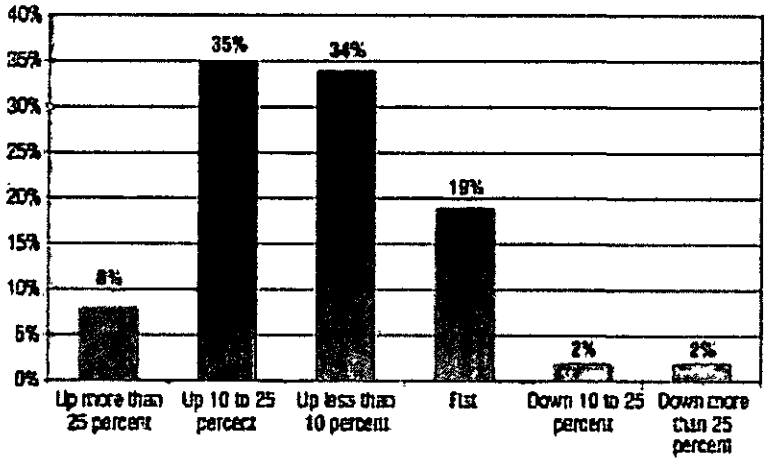
From the article we can see the industry's growth from 2014 and expectations for 2016. 73% of new boat retailers saw growth over 2014 and 77% expected 2016 sales to exceed 2015 sales.

**HOW HAS YOUR 2015 REVENUE COMPARED TO 2014?**




Click image to view larger (Source: Boating Industry survey)

**WHAT ARE YOUR EXPECTATIONS FOR 2016 REVENUE VS. 2015?**




Click image to view larger (Source: Boating Industry survey)

The staff recommendation eliminates current Mole B boater parking, all of the Mole B boater overflow parking, and much of the Moonstone Park and Lanakila parking. The city presents overhead images of parking utilization during unspecified dates and times, but these images misrepresent summer weekend utilization. There is insufficient parking for all the combined uses during the normal summer weekend days, much less peak weekends. Lanakila provided clear evidence that during summer weekends and evenings the parking utilization is much higher than depicted by the City staff.

As stated in the Human Powered Watercraft section, adding the hand launch boat ramp at this location would be dangerous and would only exacerbate the parking demand shortfall.

The Lanakila Outrigger Canoe Club has submitted a letter to the city stating that the proposed Mole B location would shut down their club. There is insufficient space to meet all the competing goals for the site and the loss of space and parking would prevent their club from operating. Lanakila provided images of parking that contradict City assertions that the parking on Mole B is underutilized and sufficient to meet all requirements. Lanakila alone represents a 54 to 78 parking space demand on Mole B. And their demand would peak on summer weekend when the parking demand for trailer boating, human powered watercraft, and recreational boaters renting slips would peak. Siting the boat ramp on Mole B as proposed would shut down an internationally renown and international competition winning outrigger club that has resided in our harbor since1970 and is enjoying increasing membership.

***The Mole B solution results in significant impacts to long term recreational and commercial uses of the surrounding area. The location and configuration included in the EIR represent multiple hazards as well. This solution should be thrown out due to the wide ranging significant impacts and hazards.***

***When you look at the cumulative facts and evidence that have come to light, one can easily conclude that City staff has lost their objectivity. They seem so married to***

***executing the CenterCal solution, that they twist information to fit their desired outcome and ignore blatant contradictions to their findings.***

2. MOLE D BOAT RAMP OPTION – Mole D in the vicinity of the current Samba's restaurant provides the best alternative for the siting of a boat ramp. This was the original site of the original boat ramp. It was damaged by a storm, but the harbor breakwall has since been reinforced and increased in height. There is ample park space available including 67 existing double length trailer parking spaces that could be relocated to the immediate vicinity. The lack of development affords ample space for maneuvering, washdown areas, and guest parking. The ramp would offload into the turn basin where trailer boat maneuvering would not interfere with the main fairway or Basin 3 fairway. It is in close proximity to the harbor mouth decreasing the exposure to increased boat traffic in and through the harbor. The city could continue to offer a boat hoist for solo, senior and disabled boaters who avoid boat ramps. And it is a short drive off of Harbor Drive that would not impact access to any access to Mole C uses, such as Seaside Lagoon, Portofino Inn, and Portofino Marina. An added benefit is a boat ramp here would preserve views through the southern tip of Mole D from Czuleger Park and Basin 3 of the harbor and ocean. A breakwater should be required for this location to mitigate waves and surge, but one should be required for any location along Mole C and D. The solution would require moving Samba's, but that is no more impactful than any other location examined by the city. For example, the Mole C site would require the movement of Joe's Crab Shack.

***The city's primary reason for avoiding this logical solution is that it would reduce the amount of space available for development of non-coastal dependent uses.***

3. MOLE C BOAT RAMP LOCATION – Mole C boat ramp location represents too much compromise for the ramp and existing users. The site is too small to provide sufficient parking for the trailer boaters and their guests. The long narrow access down Portofino Way would be shared with Portofino Inn, Baleen, Portofino Marina, Rocky Point kayak and SUP rentals, Seaside Lagoon, Shade Hotel parking at the Triton Oil site, the new street through the development and the new parking structure on the corner of Portofino and Harbor. Portofino

Inn's convention hall is right next door to the boat ramp and there is concern about boat ramp noise impacting events like weddings held in this facility. The location in close proximity to proposed Seaside Lagoon swim area and the current hand launch boat ramp, make this location a hazard to recreational users of the hand launch ramp or future swim feature without costly reconfiguration of breakwaters.

5. MOLE A BOAT RAMP LOCATION – Mole A would just be a dumb location. A boat ramp here would displace King Harbor Yacht Club which would force them to shutdown or move. Moving the yacht club creates rippling impacts to recreational uses to where ever the club is moved. Waves overtop the outer break wall here and would threaten people, boats, the boat launch facility itself and vehicles. Just south of the proposed site, the waters have shoaled to the point where they are dry on extreme low tides. This presents a hazard to navigation for users who are often infrequent users of their vessel, task saturated just after launch or awaiting retrieval, and who would not necessarily have a good understanding of the harbor. The road to Mole A requires a quick turn off of Harbor Drive barely south of Herondo. It then would have to snake through multiple 90 degree turns to get onto the road back to Mole A. This is tight maneuvering for a vehicle trailer combinations. Finally, this location is used for many popular boating, sailing, outrigger canoeing and SUP activities in the harbor that would create a conflict and hazard with boats launching into this part of the harbor.

6. MANNED KIOSK CONTROL AND RESERVATION SYSTEM

The city shows it understands its alternatives for a boat ramp facility do not provide adequate parking. The city allows itself the option of manned kiosk control, closing the boat ramp, and/or using a reservation system. Multiple avid boaters have testified they have never seen a reservation system for a boat ramp. Boaters will not know there is a reservation system until they have already arrived. This favors local boaters who frequent the harbor and know the "game". But the city provides zero details on how this would work. Would there be a fee. How would one prove their reservation? How long in advance can one make a reservation? What happens with no-shows? An undersized boat ramp will discourage non-locals from risking the

investment in time and energy to come to Redondo to launch. Clearly, the city has demonstrated they know the boat ramps planned are inadequate from a capacity perspective. And they have provided no evidence their unproven and counterintuitive remedies would be effective or fair.

6. SUMMARY – Other than placement on Mole D, placement of the boat ramp in any other location in the harbor represents significant impacts to long existing coastal dependent recreational uses of the harbor. ***Since the zoning requires a new boat ramp with the CenterCal development, the determination of the final location of the boat ramp is essential information required in evaluating the Waterfront EIR. Approving the EIR as written and granting CenterCal entitlements would eliminate the best and least impactful location for a boat ramp and forces significant impacts on other parts of the harbor. Mole D is the logical location for the boat ramp. It would allow a properly sized and designed boat ramp facility; and, the only real impacts would be on non-coastal dependent commercial uses. The EIR should be held in abeyance until a final solution for the boat ramp is defined and evaluated.***

## EXCLUSIVITY

Throughout the proceedings CenterCal, CenterCal supporters and several elected officials have used public forums and social media to paint that the public is scared by the type of people the harbor area and especially the pier attract.

Fred Bruning, CenterCal CEO, August 29th, in Daily Breeze: *"From the greater community, we heard, 'I never go to the waterfront anymore. It's rundown. It's just a bunch of bars. I wouldn't go there after dark,'" he said. "And we found people wanted to reconnect with the waterfront, but there wasn't anything to reconnect with right now."*

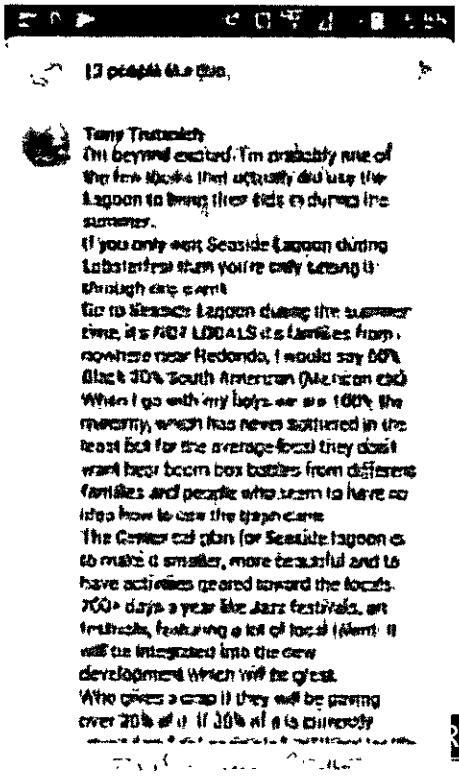
*Locals told Bruning they would perhaps go to Kincaid's restaurant once a year, or stop into Quality Seafood on the occasional Saturday, but they would leave immediately after.*

*" 'Because there's bad people there,' comments like that," he said.*

Arnette Travis, CenterCal's 'CREW" leader on Facebook:

*" It's scary on weekends and not reflective of Redondo's demographics."*

Tony Trutanich is a member of the family that old the Old Tony's restaurant on the pier. He is an administrator of a pro-CenterCal Facebook page called King Harbor Boardwalk and Market Place. Trutanich has stated on multiple occasions that he works with and represents the position of CenterCal. On the Boardwalk Facebook Site, Mr. Trutanich also echoed the anti-minority and anti-outsider sentiment reflected in the CenterCal development:



The marketing brochure being floated by CenterCal's tenant sourcing partner, The McDevitt Company shows that the move to exclude regional minorities from the harbor and pier is more than just local marketing rhetoric. The following phrases from the marketing brochure paint a picture of anything but and inclusive waterfront development:

*"A hub of social vitality for people who choose to live in this **affluent** community"*

*"Full service restaurants with a diverse collection of cuisine and dining experiences to create a vibrant and **sophisticated** nightlife scene."*

*"**Elevated**-yet-relaxed restaurants""*

*"One-of-a-kind shops and established **best-in-brands**..."*

*"The Waterfront offers a nice relevant environment for **distinctive** brands to reach **exceptional** consumers who have chosen to live/work/play just steps from the beach."*

*" **Unique** retailers placed in a **sophisticated** yet laid back environment"*

*"**Best in class** health, beauty, and lifestyle amenities."*

*"Retail/restaurant **hand picked** to resonate with the **sophisticated**, yet laid back culture of the South Bay"*

The brochure then lays out the the demographics with terms like "*urban chic, connoisseurs, top rung, laptops and lattes, trendsetters, Pacific Heights, wealthy seaboard suburbs, and silver and gold*", most of the inland neighborhoods are designated "*all others*".

For comparison the lease opportunity advertising for Shoreline Village in Long Beach, reads "*Styled after a quaint Cape Cod fishing village, Shoreline Village is a family friendly destination by day the develops a sense of romance when night falls.*" "*Refreshments available at the village range from casual to sophisticated.*" "*Kids of all ages can experience the magic of Shoreline Village's carousel or practice their hoop skills in the arcade.*" The site goes on to stress affordability and family experiences. The difference in marketing is a marked difference and is more inclusive rather than exclusive.

The City's market study analysis performed by AECOM and included in the DEIR as an attachment further demonstrates the project is aimed at more affluent customers. The hotel is described as a "boutique hotel" designed to "*create and promote a stylish, luxurious, aspirational, or advantage-grade ambiance.*" "*Boutique hotels will typically command a higher ADR than other hotel properties, with a premium up to 20 to 30 percent above market pricing for competitive properties.*" The analysis describes the movie theater as a "specialty or luxury cinema". "*The specialty cinemas target affluent and older movie going demographic and to some degree families.*" "*The higher price point compared to traditional theaters indicates the market area is wider yet capture rate is lower.*"

The proposed Master Conditional Use Permit would allow CenterCal to establish exclusive parking through valet parking. This is simply another way of excluding recreational and less affluent harbor users from access to the limited parking. Furthermore the city contemplates a "reservation system" for the boat ramp and "SUP lockers" for SUPers to protect their SUP's while they find parking. While both of these are deterrents to those who do not frequent the harbor area, the City is silent on what the cost of these services would be. Charging for these services would just further the exclusive environment of the harbor and pier area. The under capacity boat ramps advocated by staff are just another form of exclusivity, setting those who cannot afford slips from using the harbor. The limited size of the boat ramp facility is directly impacted by staff and CenterCal's desire for more non-coastal dependent upscale commercial uses.

***In summary, what is currently an extremely popular attraction for people from all backgrounds and all income levels, is being transformed into a more exclusive and sophisticated development targeting more affluent people. It is predominant in CenterCal social media rhetoric as well as their marketing for tenants and selection of uses.***

***The more affordable recreational opportunities are all negatively impacted by the development, Seaside Lagoon, access and parking for fishing, access for stand up paddling and kayaking, access and parking for passengers on whale watching and sportfishing boats, forcing the outrigger canoe club to shut down, and the staff's preferred alternatives for the boat ramp artificially limit the boat launching availability and capacity for those who cannot afford a slip in the harbor.***

## TRAFFIC

Despite a public records request, it does not appear that the city has provided all data, analysis and calculations related to the weekend traffic analysis for the protect. The author was unable to find the LOS calculations. Therefore this traffic analysis is not complete due to unreasonable time constraints and missing information. In fact, when the public records request was resubmitted, the City responded that they needed more time to supply the actual traffic analyses. This delay means BBR would not receive the information until after the comment period is closed. Therefore BBR cannot conclusively comment to the new information included

in the final EIR despite two proactive public records requests.

The proposed mitigations to traffic impacts create unsafe conditions by eliminating medians and decreasing lane widths at complicated saturated major intersections such as PCH/Herondo/ Catalina/190th.

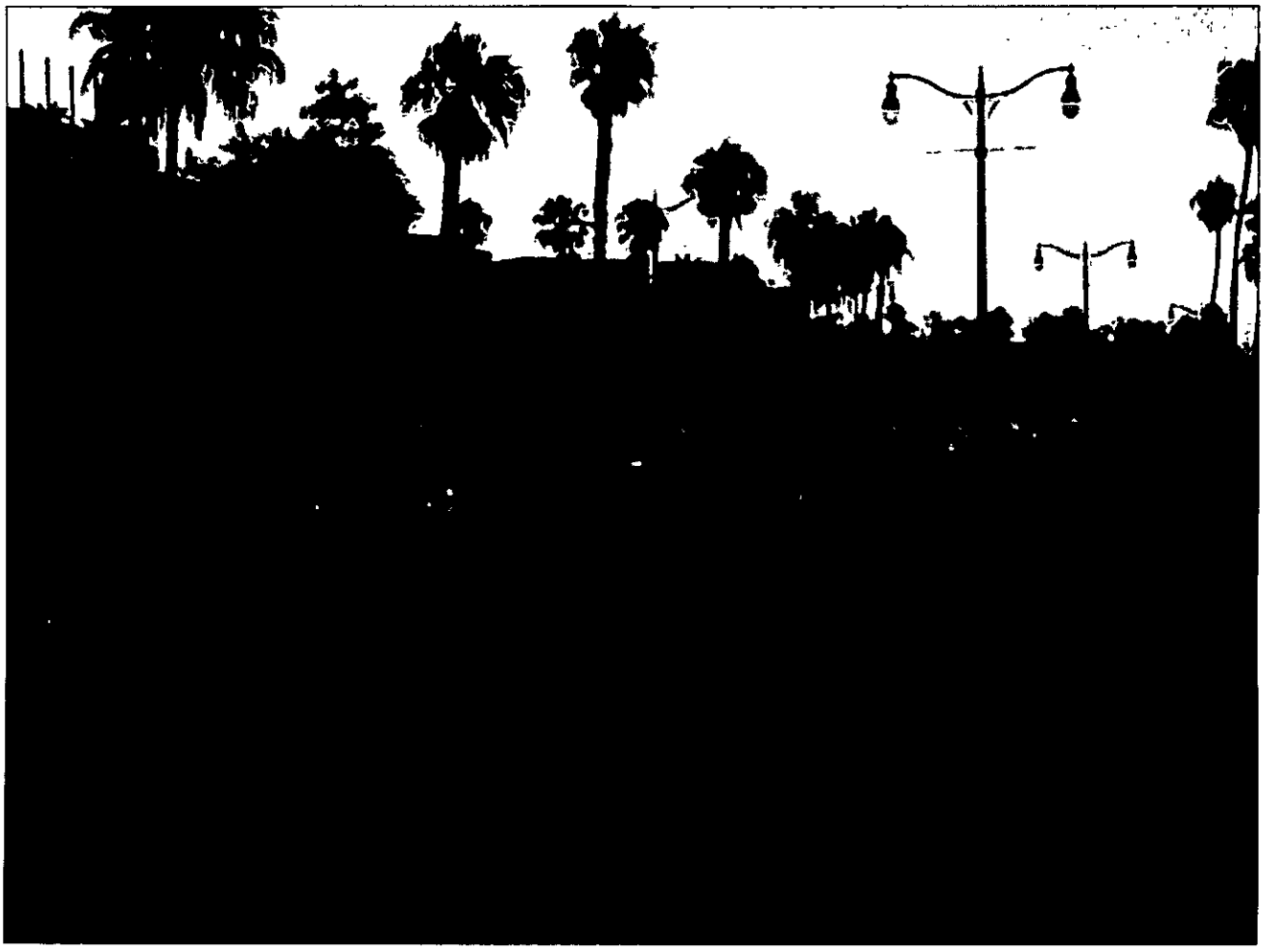
CenterCal and the city have both stated that underperforming uses of the project would be repurposed. The movie theater was specifically given as an example. The conversion of a movie theater to a like sized retail or restaurant would increase traffic and parking demand. However, it is unlikely if a use such as the movie theater fails, the city would find anything but that a repurposing of the huge facility was required despite any impact on parking and traffic. Indeed Redondo has experienced this type of repurposing in the harbor already. The 60,000 sq ft Pier Plaza development on top of the pier parking structure was to be retail and restaurant uses. But after the development failed, the city has allowed it to be used mostly for office space that has nothing to do with coastal dependent uses or visitor serving commercial uses.

Despite comments in the DEIR, the city has failed to incorporate the real world constraints on traffic infrastructure in the project area. This renders the city's assessment of impacts inaccurate and understated. Rather than repeat all the infrastructure constraints, BBR references the traffic section submitted in its comments on the DEIR. Likewise the city continues to use trip generation tables instead of actual traffic counts to characterize current traffic. The city has repeatedly stated the harbor and pier businesses are underperforming. Use of the trip generation tables rather than real data or discounted trip generation numbers artificially lowers the impacts assessed on each intersection which then ripples into misrepresentation of LOS.

One way to test models is to compare them to real world observed conditions. The photos that follow show a current gridlock condition on Harbor Drive that the DEIR traffic calculations say should not exist even after cumulative development and the Waterfront project are fully built out. But this demonstrates the impact of the infrastructure limitations that are not included in the traffic calculations and modeling. The images show Sunday mid morning traffic on an overcast

mid July Sunday. The images show traffic on Harbor Drive backing up from the stop sign at the southern harbor parking entrance all the way back through the Beryl/Harbor/Portofino intersection. The rear of the back up was about a quarter mile from the start of the back up. This situation is the definition of gridlock. And it is not an anomaly. This is a regular weekend and weekday rush hour occurrence. Traffic flow has broken down because one intersection cannot handle the traffic flow and starts to affect flow through preceding intersections. Since the assessment does not accurately represent the current conditions and traffic flow, the predictions post project completion cannot be trusted or counted as valid. Again, the City analysis does not account for well known and documented infrastructure limitations and conditions. And as pointed out in the initial DEIR response, the project increases in driveways, repeat traffic circling looking for parking, and the poor bike path configuration will only compound the errors that are evident by looking at current conditions.

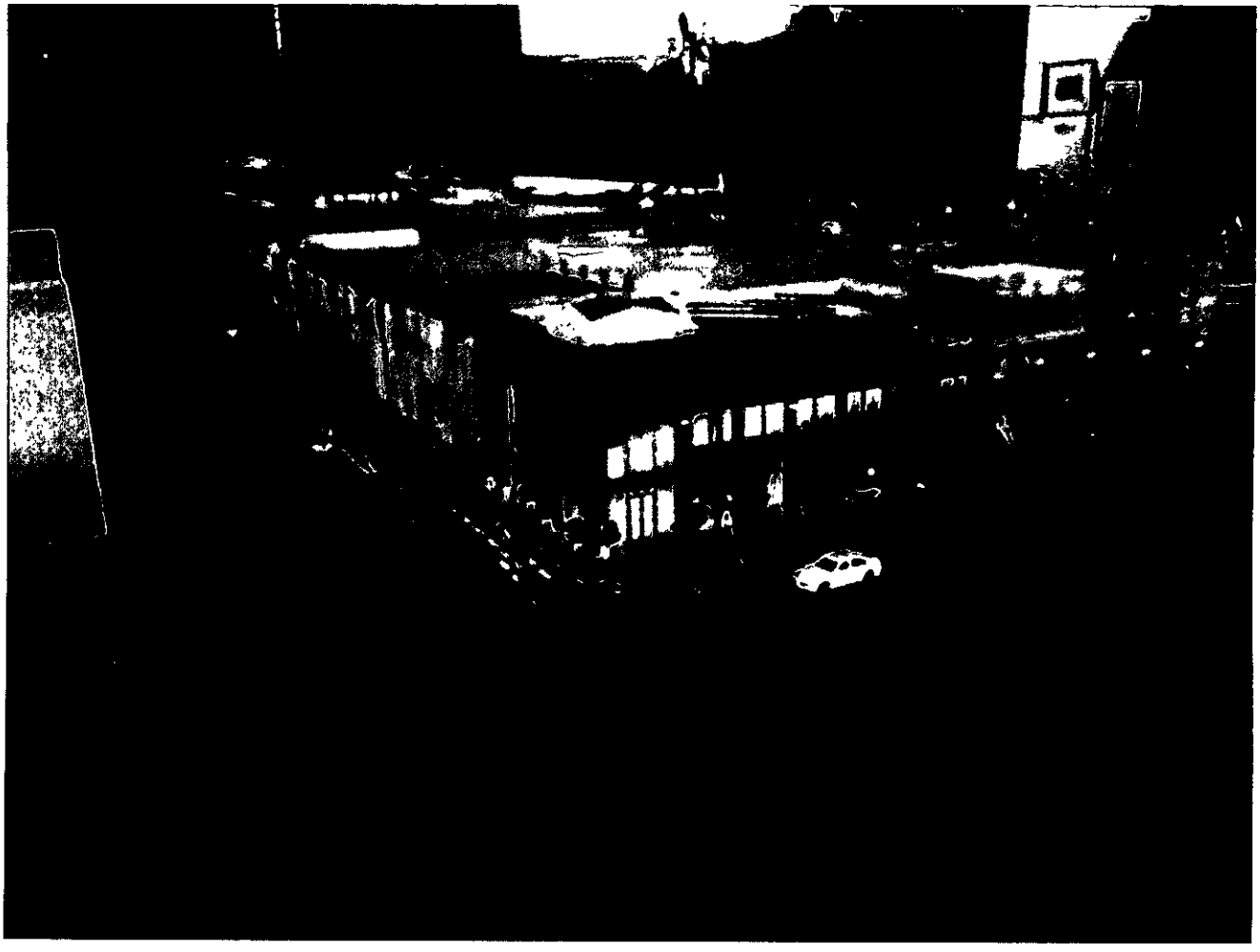
Also note, the first image shows that despite City EIR claims to the contrary, parking in the harbor is already near capacity on a non-holiday weekend.



## MASSING AND DECEPTIVE RENDERINGS

CenterCal renderings and marketing videos released to the City, press and public were specifically designed to hide the real mass and compactness of the site. Recently, CenterCal released images of their model of the project. Again, they showed convenient perspectives. But after public pressure, CenterCal opened up their model for public viewing at their offices 8 miles away during limited hours. A CenterCal rep had to be present to control the messaging. But what has come out of that is pictures from the public that show the true massing of the project.

The following pictures show a massing that is not experienced in Redondo except for mall sites and industrial sites. This first image shows how massive and dominating the project will look from Harbor Drive.

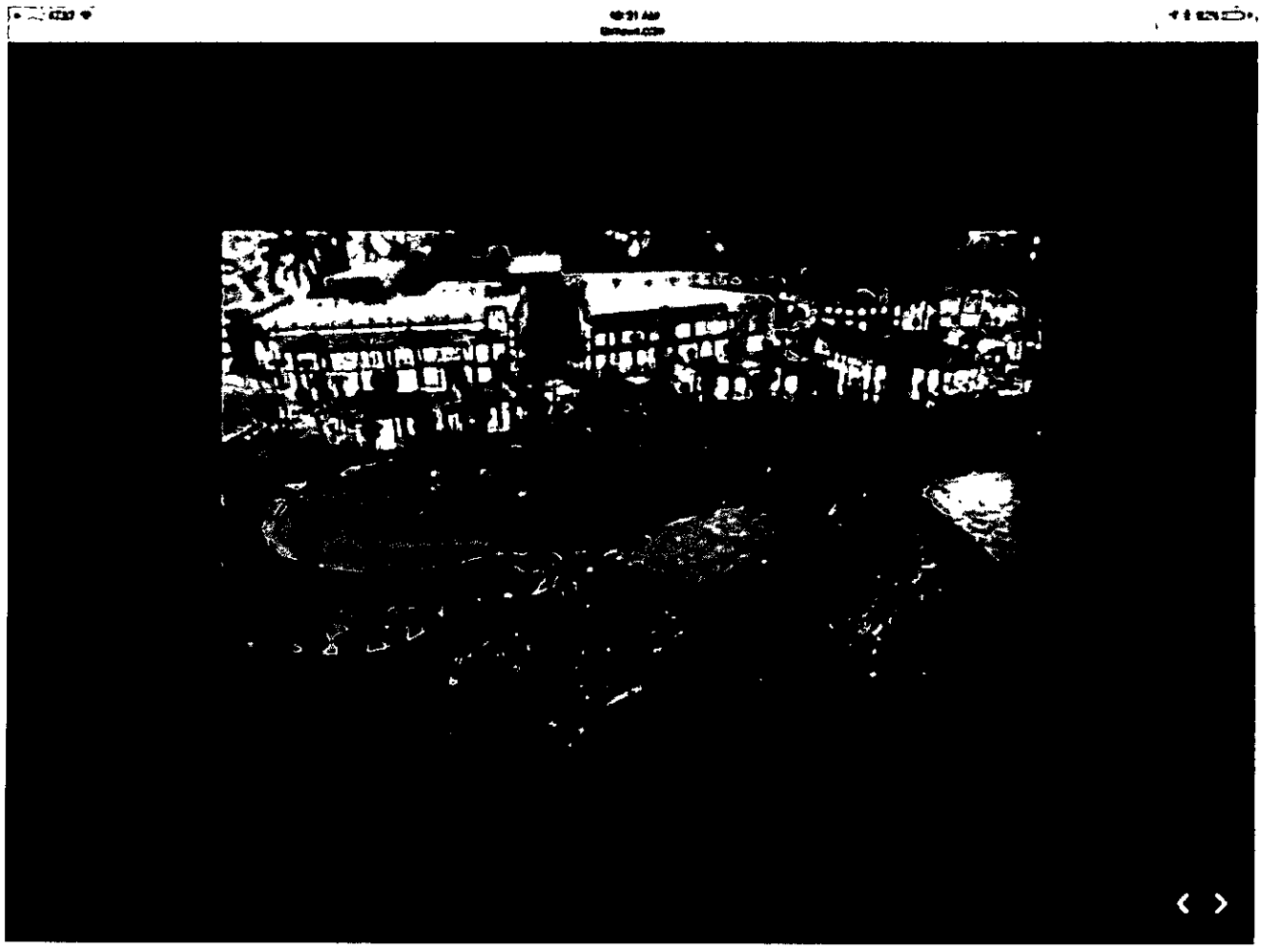


This second image focuses more on just Harbor Drive. The project represents a virtual wall between residents and the harbor. This is how most residents will experience the development most of the time.

Here is a current image taken from a similar angle from the balcony at Redondo Hotel. The before and after images of massing and development are shocking. Yet the EIR concludes massing is consistent and there are no significant view impacts. Our previous DEIR comments address the dramatic impact on views.

This rendering demonstrates some of the manipulation practiced in the EIR and City/CenterCal representations to the public. Note the beach looks wide, endless north to south. And it looks deep, it looks like hundreds of yards to any sizable development. Palm trees dominate the skyline.

The next image is a photo of the scale model. This image clearly shows a much smaller beach/ harbor water interface tightly framed by breakwater boulders. It shows a much more constrained beach much closer to the development. And it shows how the massive parking structure/commercial building and the theater building will loom over the small beach area. Buildings not palm trees will dominate the skyline for any who use the Seaside Lagoon beach. The model brings the massing into a real perspective.



## CUMULATIVE IMPACTS

The city provides an assessment that development on the AES property are speculative and that the city has chosen a generic growth assessment rather than assessing specific known projects. While the SCAG growth models project overall growth over a large area, that hardly means they are sufficient for specific areas with significant project activity. The city disregards major and cumulative projects that would stair step development above and beyond the broad averaged growth estimates of SCAG. The city fails to analyze that the known and foreseeable projects would fall within the SCAG growth estimates they used.

The AES property, the city knows that even if AES were to rebuild their power plant, they would have excess land that they would wish to repurpose. AES has repeatedly telegraphed this fact publicly. The City also knows AES desires to sell it land for development. Their Measure B would have allowed hundreds of condos and tens of thousands of feet of commercial development. AES had clearly shown its cards. The city should use the Measure B zoning as the upper cap of what will occur with the AES property.

The city of Hermosa Beach provided a list of projects and rezoning efforts that would impact traffic and intensity in the project area. The new zoning alone would allow over 600,000 sq ft of additional commercial development. The city should incorporate and assess the impacts of this change and the other projects cited by the City of Hermosa Beach.

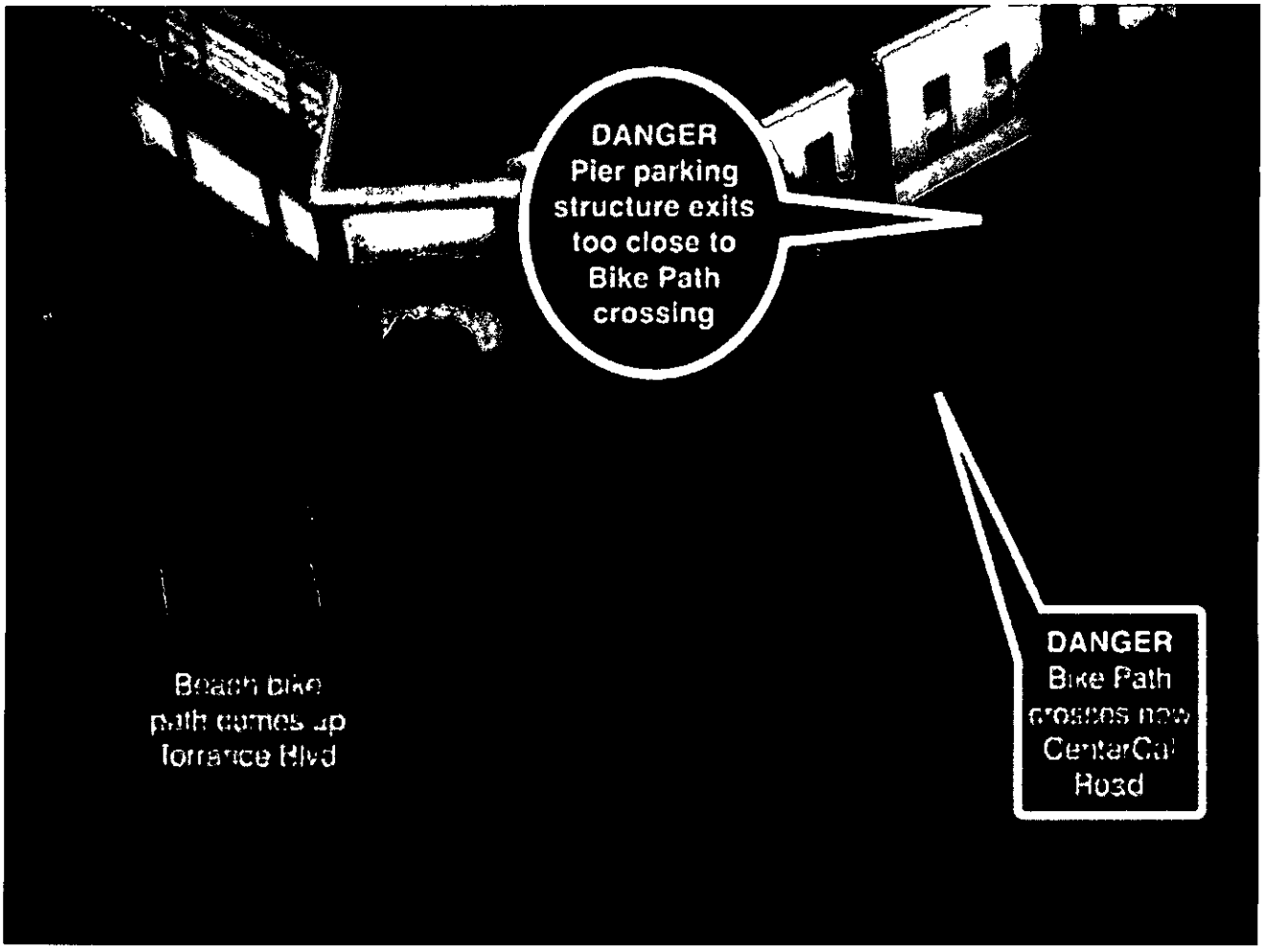
The city's refusal to assess known major project represents a violation of CEQA.

## VIEW IMPACTS

The city incorrectly assesses the comments wrt to view impacts. Standing at any point along S Harbor Drive in the project area, any observer has some view of the harbor, the ocean, boats in the harbor, and/or the cliffs of Palos Verdes. The site assessment provided by BBR used the plan views provided by CenterCal and were generous in that they did not assess all the views blocked by landscaping in few slivers of view corridor left in the proposed development. In fact the view blockage is over 85% even with the new sliver in the parking structure and the slight parking structure setback from Portofino/Harbor intersection. The city's assessment that 60% of the views are still available under the development are not supported by any evidence.

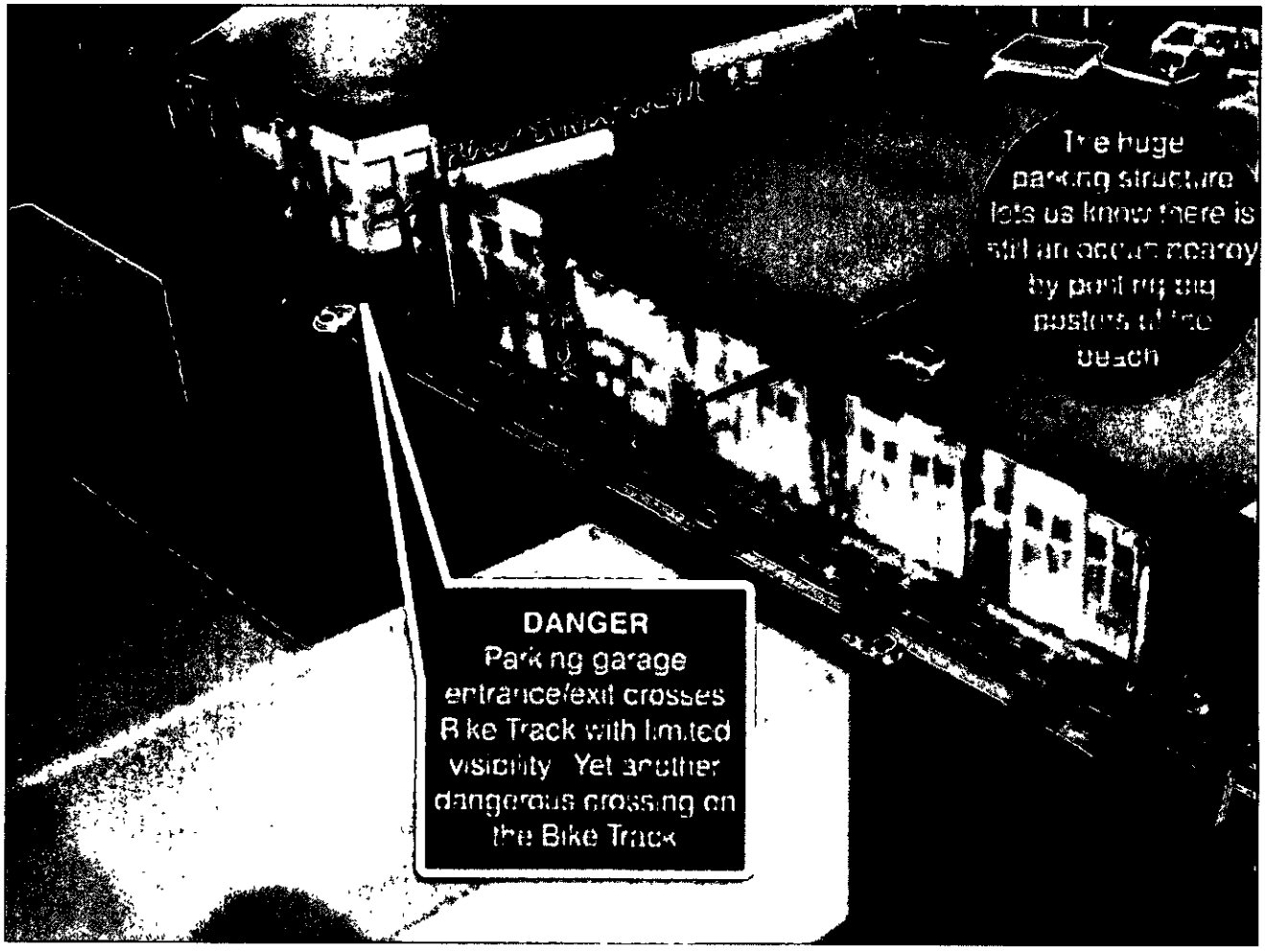
## BIKE PATH

The proposed bike path on the east side of the new road joining Torrance Blvd to Harbor Drive reintroduces dangerous street crossings that the city just paid over $4M to eliminate on Harbor Drive. While the original double crossing requirement only affected north bound bike traffic at either end of Harbor Blvd, the proposed bike path requires bike traffic in BOTH directions to make the dangerous crossing twice and the northern crossing requires crossing two streets (see




second image of bike path from the CenterCal model). This solution is WORSE than the situation just remedied on Harbor Drive. The City should define alternate solution that eliminates any bike traffic crossing the new road. This is a dumb and dangerous design. The City should not have allowed it to make it to the FEIR. But it serves as yet another indicator that the commercial uses were given priority to all recreational uses in the project area. Photos of CenterCal's model highlight the poor design.

DANGER
How does the Harbor Drive Bike Track connect to the new bike path??? No safe passage
DANGER
Bike Path crosses new CenterCal Road again at 4 way intersection




The city still allows the pedestrian path through the development to be labeled as a bike path. A recent study presented to the city council demonstrates the city understands the conflicts between pedestrians and bicyclists create hazards. And this study was just for the parking structure. The conflicts of people shopping and eating in the harbor area especially on the sloped drawbridge represents an even greater risk. It is deceptive and irresponsible for the city to allow the claim that the pedestrian path through the development would ever be a realistic and safe bike path.

# CONSISTENCY WITH APPLICABLE STATE AND LOCAL REQUIREMENTS

BBR stands by it original assessment provided in its DEIR comments. Every current coastal-dependent recreational and commercial use is negatively impacted by the proposed development. The new boat ramp design is artificially constrained by the prioritization of non-coastal dependent commercial development. The most used park in Redondo beach is paved over for access and parking for non-coastal dependent recreational uses and rendered much less attractive to its current users. There is no parking allocated, protected or assessed for recreational uses of the waterfront. Forcing recreational users into parking structure represents a deterrent and access limitation to those uses. Public views from Harbor Drive and Czuleger park are significantly impacted despite City claims to the contrary. And cumulative development cap is exceeded when one includes the new parking structure in the assessment as the city properly should. These all represent violation of California Coastal Act, the City's Local Coastal Plan and the City's zoning ordinances. BBR provided specific citations in its DEIR comments that still stand.

Furthermore the City has violated the CEQA process by improperly assessing impacts as demonstrated herein and in our original DEIR comments, by inadequate definition of the project, by introducing substantial new changes (especially Mole B boat ramp location) just prior to the release of the FEIR. The city has failed to account for cumulative impacts properly. And the City's formatting of the FEIR, the short time constraint, and the remaining variability allowed in the project at this late stage have made it impossible for the public to provide a thorough review and comment.

| Requirement | Summary | Inconsistency |
|---|---|---|
| Coastal Act 30001.5 | Goal of Coastal Act is to assure priority of coastal-dependent and coastal-related development over other development of the coast | EIR and project prioritize non-coastal dependent uses over existing and required coastal dependent uses |

| | | |
|---|---|---|
| **Coastal Act 30006** | Planning and implementation of programs should include widest opportunity for public participation | Last minute changes to EIR and project, complicated arrangement of EIR, short review period, missing data and reports, and slow response to public records requests artificially limit public participation |
| **Coastal Act 30006.5** | Sound and timely scientific recommendations are necessary. | EIR analysis relies on outdated data such as harbor surge data and incomplete data such as harbor water quality to justify conclusions that there is no impact. |
| **Coastal Act 30007.5** | Conflicts between policies to be resolved in manner of which is most protective of coastal resources | EIRand project resolve conflicts to favor non-coastal dependent commercial development |
| **Coastal Act 30105.5** | Definition of cumulative effects | EIR analysis ignores probable future projects. |

| | | |
|---|---|---|
| **Coastal Act 30211 and 30212** | Development shall not interfere with access | The traffic generated by the project combined with circulation infrastructure constraints interferes with access to access to coastal dependent activities.<br><br>The lack of sufficient and convenient parking interferes with the public's access to coastal dependent activities.<br><br>The creation of hazardous situations interferes with the public's access to coastal dependent activities and resources.<br><br>The decrease in size and capacity of coastal dependent activities and areas interfere's with the public's access to coastal dependent activities and resources. |
| **Coastal Act 30212.5** | Public parking area and facilities shall be distributed to mitigate social and other impacts of overcrowding and overuse | The project more than doubles commercial development while shrinking usable public parkland. The project fails to assess or provide adequate and convenient parking for existing and new coastal dependent uses. |

| | | |
|---|---|---|
| **Coastal Act 30213** | Encouragement of lower cost visitor and recreational facilities | Project designed to appeal to more affluent public. Unique recreational resources drawing all income level customers are negatively impacted by the project. |
| **Coastal Act 30214** | Legislative intent on implementation of public access policies | The project increases the intensity of site utilization to the point where it is a deterrent to those who want to enjoy coastal dependent uses. The project does not balance rights of public with that of developer/lessee. |
| **Coastal Act 30220** | Coastal areas suited for water-oriented recreational activities shall be protected for such uses. | Project develops harbor area such that water-oriented recreational uses are needlessly impacted. |
| **Coastal Act 30221** | Oceanfront land suitable for recreational use shall be protected for such use | Project redevelops oceanfront property in a manner that negatively impacts long established recreational uses |
| **Coastal Act 30222** | Use of private lands suitable for visitor serving and coastal recreational facilities shall have priority over general commercial development | The project prioritizes private retail, dining and entertainment uses over coastal recreational facilities. |
| **Coastal Act 30223** | Upland areas necessary to support coastal recreational uses shall be reserved for such uses | Uplands parking and vehicular access for coastal recreational uses are negatively impact by the project. |

| | | |
|---|---|---|
| **Coastal Act 30224** | Increased recreational boating use shall be encouraged | Project reduces slips and provides insufficient space for adequate boat ramp. Project eliminates sufficient boater parking. Project forces recreational boating uses in small area that reduces overall capacity and efficacy of long standing recreational boating uses. Parking to support existing recreational boating uses are insufficient and inconvenient to the point of acting as a deterrent. Limited hours of pedestrian bridge discourages recreational boaters. Project does not accommodate future growth of demand of recreational boating infrastructure and opportunities. |
| **Coastal Act 30234** | Facilities serving commercial fishing and recreational boating industries shall be protected and upgraded. Existing facilities shall not be reduced. | Project forces commercial and recreational vessels out of Basin 3 due to pedestrian bridge. Project eliminates slips for commercial and recreational vessels. Project allows elimination of nearly 50% of current slips in Basin 3 without any analysis to show demand no longer exists. |
| **Coastal Act 30234.5** | The economic, commercial, and recreational importance of fishing shall be protected. | The project provides insufficient parking for pier, commercial and charter boat fishermen. The project reduces usable commercial and recreational boat slips. |

| | | |
|---|---|---|
| **Coastal Act 30240** | Protection of sensitive habitat areas | The harbor area is known roosting place for multiple protected marine birds. Intensity of development will be a deterrent to future nesting/roosting. |
| **Coastal Act 30251** | Development shall be designed project views | Project blocks most public views from harbor drive. |
| **Coastal Act 30252** | Maintenance and enhancement of public access | Project prioritizes parking and access to retail, dining and entertainment uses over coastal dependent and coastal related uses. Inadequate parking to support current level or harbor recreation or for future growth in demand. Project decreases usable public parkland at Moonstone Park and Seaside Lagoon. |
| **Coastal Act 30255** | Coastal dependent development shall have priority over other development on or near the shoreline. | Coastal dependent uses, particularly the Seaside Lagoon and public boat ramp are negatively impacted by the prioritization of othe non-coastal dependent uses. |
| **Redondo Beach. Coastal Land Use Plan Section VI, Subsection C** | Cumulative development shall not exceed a net increase of 400,000 sq ft of floor area. | Project excludes new parking structure from analysis. Project and cumulative development exceeds cap. City interpretation does not reflect information presented to the voter when voters enacted this cap. |
| **Redondo Beach. Coastal Land Use Plan Section VI, Subsection C** | Protection of views from Czuleger Park | EIR does not adequately assess view impacts. Substantial impact on views from mid and lower sections of park by hotel/retail development in pier area and Market Hall in harbor area. |

| | | |
|---|---|---|
| **Redondo Beach, Coastal Land Use Plan Section VI, Subsection C** | New development shall Include view corridors from N Harbor Drive | Development blocks vast majority and most impactful public views from visitor serving hotels, Harbor Drive of harbor, ocean, coast of PV and Catalina Island. The development only affords narrow slivers of views and these are impacted by landscaping. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 1** | Coastal dependent land uses encouraged. Existing facilities preserved, enhanced and expanded where feasible. Public boat launch shall be built. Removal of existing uses shall be strongly discouraged unless determined uses are no longer necessary. | The project cuts slips without any analysis or projection of future needs. The city shrank usable land and water area of Seaside Lagoon and configured it to discourage use. The project reduces parking for commercial uses and makes it inconvenient further discouraging and artificially limiting use. Public boat ramp is suboptimized due to non-coastal dependent use prioritization. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 2 a)** | New development shall be designed to preserve and enhance public views from Harbor Drive | Project blocks vast majority of public views from Harbor Drive. |

| | | |
|---|---|---|
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 2 c)** | New development shall be designed to be consistent and harmonious with scale of existing development | Massing and scale are inconsistent with rest of harbor and surrounding area. Parking structure combined with commercial development increases development by 1000% in the harbor portion. Model shows massing is inconsistent and not harmonious with surrounding development. Lack of setbacks and buffers between massive structures exacerbates scale and massing inconsistencies. |
| **Redondo Beach, Coastal Land Use Plan, Section VI, Subsection D, Land Use Policy 17 and 18** | Development shall not impact environmentally sensitive habitat areas | Protected marine birds are known to nest in Palm trees throughout project. Size, scale, and intensity of project will impact nesting/roosting areas. |
| **Redondo Beach Municipal Code 10-5.800 (b)** | Provide development designed to enhance public opportunities for coastal recreation, including commercial retail and service facilities supporting recreational botany and fishing which primarily oriented toward meeting dees of visitors, boaters and residents seeking recreation; have balanced diversity of uses; provides regional serving recreation for all income groups, and protect coastal resources. | Development is designed to increase non-coastal dependent retail, dining and entertainment at the expense of recreational uses serving all income groups and businesses and facilities supporting those uses. |
| **Redondo Beach Municipal Code 10-5.1110** | Permitted and conditional uses of land zoned P-PRO | Permitted uses do not include public roads primarily serving private commercial development |

| | | |
|---|---|---|
| **Redondo Beach Municipal Code10-5.1706** | Parking regulations and Shared parking analysis | Shared parking analysis did not account for peak uses of proposed uses and for peak uses of recreational uses of harbor. Assessment did not consider impact of exclusionary valet parking. |

## SUPERIOR ALTERNATIVE:

Based on the evaluation provided in this report BBR presents the following as a superior and better balanced alternative to the massive development and understated impacts of the city staff recommended alternative or primary project description:

- Full sized or expanded Seaside Lagoon preserving or expanding current public open space land and water area within park. Swimming/wading/play water feature with sand bottom and direct beach access for at least a portion of the facility separate from harbor waters. 250 surface level parking spots contiguous with boundary of park. City shall explore land area and facility expansion to include a non-profit or public aquatic facility for storing, teaching, and renting human powered watercraft.

- Separate human powered boat launch with current facility road access and gradual sloping ramp to sand bottom from existing road. A minimum of 50 spaces nearby surface level parking for users.

- Two lane boat ramp on Mole D at or around Samba with a minimum of 60 trailer spaces through the southern end of the mole to preserve views from Czuleger Park. Retain operational boat hoist. Boat ramp shall not adversely impact existing recreational uses of harbor.

- Pedestrian Promenade to be built up to each side of the Mole D boat ramp with observation pad on either side. Promenade to have two paths – one across boat ramp, for low utilization periods and one from boat hoist area to Sportfishing pier area for busy ramp periods.

- Retention of Sportfishing pier and all slips in Basin 3. No reduction in slips permitted for this project. 120 parking space shall be allocated for basin 3 in close proximity to slips and without crossing an active road. 60 surface level parking spaces shall be allocated for the Sportfishing pier fishermen and public disembarking on Sportfishing or whale

watching vessels in close proximity to the Sportfishing pier. Accommodation of a tall ship at the sport fishing pier shall be investigated and implemented if feasible.

- Pedestrian bridge permitted but not required. Must be able to open within 10 minutes of call up for any vessel seeking access or egress to Basin 3.

- Bike path through project must connect directly with bike track without crossing east to west or visa versa.

- No new parking structure is permitted in the harbor area. No new public road shall be established connecting Harbor Drive to Torrance Blvd. And access road for public safety vehicles is permitted.

- Market Hall is permitted either in the vicinity of the pier parking structure or at the location of R10, Paddle House, Captain Kidd's, and Marina office area.

- Commercial development increase is permitted as allowed by Measure G and the other requirements stated in this alternative. Parking and traffic to be able to serve peak concurrent uses of all commercial development. Parking to be segregated from recreational/commercial coastal dependent uses. No sharing is permitted between general commercial development and recreational/commercial coastal dependent uses except that recreational users may use commercial parking.

- Redevelopment of International Boardwalk is permitted.

- Mole B to be developed per existing Master Plan.

- At least 40% of current views from Harbor Drive to be preserved including views of harbor, ocean, PV coastline and Catalina Island.

## CITY OFFICIALS HAVE BECOME BIASED ADVOCATES FOR THE PROJECT

Mayor Aspel appears in the promotional video produced by CenterCal. He also stated at his annual State of the City address that those opposed to the project were a "sour grapes organization". From a Beach Reporter article by Kelcie Pegher on February 2, 2016 in an article entitled "Redondo Beach Mayor Steve Aspel pokes at opponents during State of the City address":

*" 'There's a group – they call themselves grass-roots. They're not a grass-roots organization. They're a sour grapes organization,' Aspel said, a not-so-subtle dig at Rescue Our Waterfront,*

*billed as a community group supporting a 'more balanced revitalization' of the waterfront."*

Mayor Aspel vetoed a council approved discussion about putting the project to a vote of the people. And he subsequently he vetoed a council approved simple financial assessment of CenterCal.
Similarly we find City staff cherry picking data that supports their desired conclusions supporting the development while ignoring blatant evidence to the contrary as has been pointed out throughout this report.

***When one looks at the hard to follow format of the EIR (which is different than any previous EIR the city has produced), the lack of specificity in what is supposed to be a project EIR, the major changes even post EIR release, the attempt to segregate the boat ramp evaluation from the rest of the project, and the refusal to engage the public on the major changes, one can easily draw the conclusion that City staff and elected proponents have become advocates for the project and have lost their objectivity.***

**This process should be stopped. The project should be fully and properly documented complete with the required boat ramp. The impacts should be reevaluated using reasonable evidence. And the entire EIR should be rereleased as a draft for a full and proper public review.**

# Administrative Report

**Council Action Date: March 15, 2016**

**To:** **MAYOR AND CITY COUNCIL**

**From:** **TED SEMAAN, PUBLIC WORKS DIRECTOR**

**Subject:** **USE OF TECHNOLOGY TO BETTER REGULATE PEDESTRIAN AND BICYCLE TRAFFIC AT THE PIER**

## RECOMMENDATION

Receive and file the following report regarding the potential use of technology to better regulate pedestrian and bicycle traffic crossing where the beach bike path meets the south end of the pier for improved safety and traffic flow.

## EXECUTIVE SUMMARY

As part of the City's current Strategic Plan, the Public Works Director and the Information Technology Director are directed to explore and recommend to the City Council for consideration the potential use of technology to better regulate pedestrian and bicycle traffic crossing where the beach bike path meets the south end of the pier for improved safety and traffic flow. Staff has reviewed existing conditions at the Pier and has also researched the available tools that could assist in enhancing safety. These tools utilize both cutting edge technology as well as proven traditional traffic engineering techniques. Development of a specific modification project is ongoing, with the following potential enhancements currently identified:

- Installation of "WALK BIKES BEYOND THIS POINT" with flashing beacons that are actuated by heavy pedestrian volumes at key conflict points. Outside of the conflict points, cyclists will be allowed to resume riding in order to maintain an appropriate level of bicycle mobility.

- Installation of illuminated (flashing) STOP and warning signs at locations where vehicles cross the bike path and pedestrian pathways.

- Installation of flashing "YIELD TO PED" signs for the bike path at lower volume pedestrian crossings.

- Repaint and install new centerlines, lane lines and pavement markings (including pedestrian crossing ahead markings) for improved bike path guidance.

- Install additional signage, markings and barriers to keep pedestrians on pedestrian facilities instead of the bike path.

- Provide enhanced pedestrians crossing signage and markings.

Staff is preparing conceptual designs for these enhancements for presentation to the appropriate Commissions and then to the City Council. We expect to have the designs ready for review within 6 months.

## BACKGROUND

Within the Pier area, there are two Municipal Code Sections that apply to bicycle travel. RMBC Section 4-9.802b states the following:

> *Prohibited Activities - Bicycles. It is unlawful for any person to ride a bicycle within the area described in this article; provided, however, bicycle riding shall be permitted on any portion of said area designated as a bicycle path.*

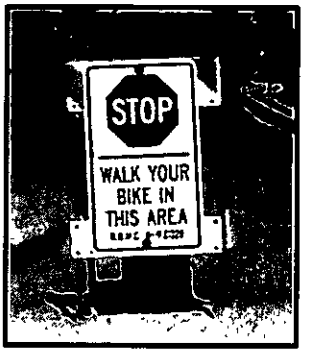
RBMC Section 12-2.07 also applies to bicycle travel and states the following:

> *Bicycle and skateboard riding is prohibited on any portion of any pier, wharf, public area, parking structure, or City-owned property where posted, except as may be otherwise provided for in this Code.*

Staff reviewed conditions along the bike path and pedestrians pathways generally located between the open-air parking lot at the southerly terminus of Pacific Avenue and the southerly entrance to the Pier (see Attachment 1). Field observations revealed that significant conflict can occur between vehicles, bicycles and pedestrians in the Pier and parking areas. Specific issues observed and potential mitigations include the following.

### Conflict During Heavily Congested Periods

There are current signs near the south end of the bike path that require cyclists to walk their bikes. This restriction applies to cyclists on the bike path between George Freeth Way and just north of the restroom pedestrian crossing. Cyclists can resume riding outside of these limits. These signs are theme-based, decorative and consistent with the overall Pier design. However they also have limited impact to bicyclists regarding the need for care and are easily lost amongst other signage nearby equipment and site furnishings. This can result in poor yielding compliance when required, frustration on the



part of both cyclists and pedestrians, and an increase in accident potential. During certain periods, additional signs are placed that emphasize the requirement to dismount bicycles.

Bicycle and pedestrian traffic can vary widely on a seasonal, daily and hourly basis. It is also heavily influenced by the weather, which can result in unusually heavy volumes when there are warm temperatures even during traditionally light months. During periods of substantial pedestrian activity, it is necessary to eliminate the conflict by requiring cyclists to dismount and walk through these areas. However when there is little or no pedestrian conflict, requiring cyclists to dismount will result in little benefit and would have little compliance. Field observation confirmed the lack of compliance from a percentage of cyclists when there was little perceived pedestrian conflict. A more effective approach would be to utilize a combination of clearly understandable dismount signage combined with flashing beacons that indicate when the requirement is in effect. The flashing beacons could be actuated by passive pedestrian detection, similar to what is utilized at traffic signals, or based on a timer. This actuation would eliminate the need for manual placement of the additional signs. A potential sign design is shown below and a conceptual implementation for southbound riders is illustrated In Attachment 2. A similar approach would be used for northbound riders as well. Outside of the dismount zone, 'RESUME RIDING" signs would be placed to inform cyclists.

Sign with Rapid Rectangular Flashing Beacon

Sign with Standard Flashing Beacon

**Vehicle Conflict with Pedestrians and Bicyclists**

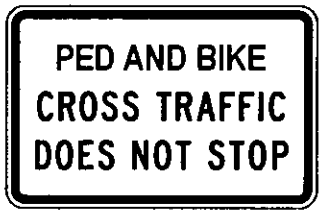
Vehicles cross both the bike path and the parallel pedestrian walkway at the north pier parking structure. There are two crossings: the east crossing provides one-way access for vehicles into this parking area and the west crossing provides for one-way exit from the parking area. Both locations have restricted visibility of cyclists and pedestrians, and would benefit from enhanced traffic controls.

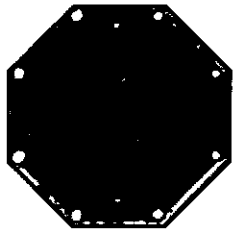
The westerly crossing has a posted stop control for vehicles, supplemented by a faded "STOP" pavement marking. Left-turns are prohibited due to the vehicle circulation pattern on the other side is one-way from left to right. As shown, the walls to this exit aisle abuts directly against the pedestrian pathway and bike path, limiting visibility. This is especially critical for pedestrians and cyclists

approaching from the east (left). To increase safety, additional enhancements to the traffic control devices at this location would be beneficial. The following identifies some of the devices that are being considered:

- Utilize a flashing stop sign to increase motorist awareness of the need to stop before continuing across the pedestrian and bike facilities;

- Install additional warning signage to notify motorists of the potential for encountering pedestrians and cyclists, and that they have the right-of-way; and,



- Repaint the "STOP" marking and install a limit line.

The easterly crossing, which provides vehicle entrance into the north pier parking area, presents a challenge for motorists turning right. They have a clear line-of-sight for cyclists and pedestrians approaching them from the west (front), but it is difficult to observe (and yield) to those approaching from the east (behind them). This location is illustrated below.

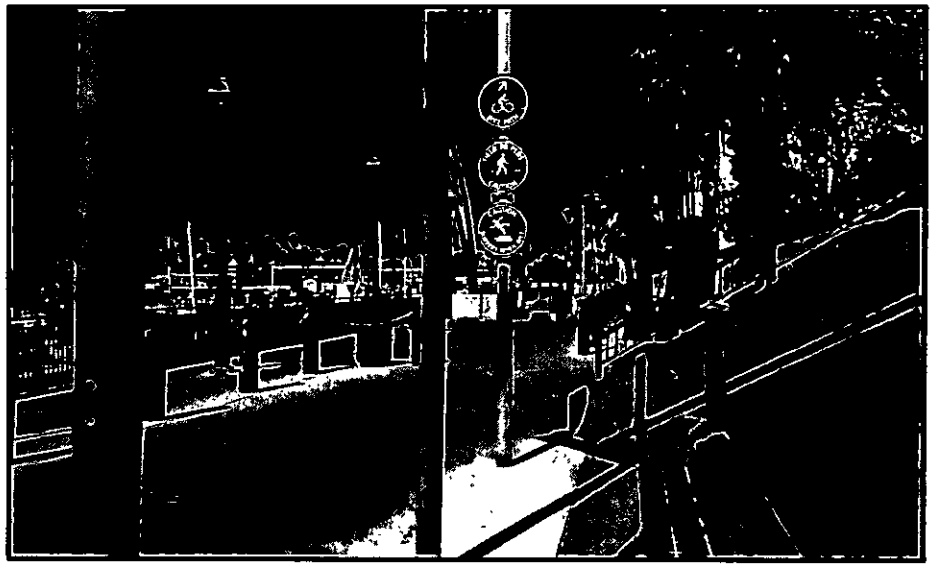
This location provides a good opportunity to increase warning signage to better alert motorists of the need to yield before turning, and could utilize detection technology in conjunction with flashing beacons when there are approaching pedestrians and cyclists.

Potential enhancements for the east crossing shown above include the following:

- Install warning signage to notify motorists of the potential for encountering pedestrians and cyclists from the right/rear;
- Utilize flashers with detection of approaching pedestrians and cyclists from the right/rear; and,
- Install bike path markings and pedestrian crosswalk pavement markings.

**Pedestrian Crossing Warnings**

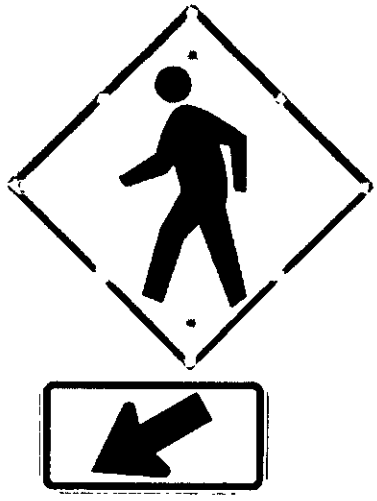
As with the signs instructing cyclists to walk their bikes through certain areas, the "YIELD TO PEDS" signs are also decorative and have the same limited impact to



bicyclists. To address this issue, the following modifications could be implemented:

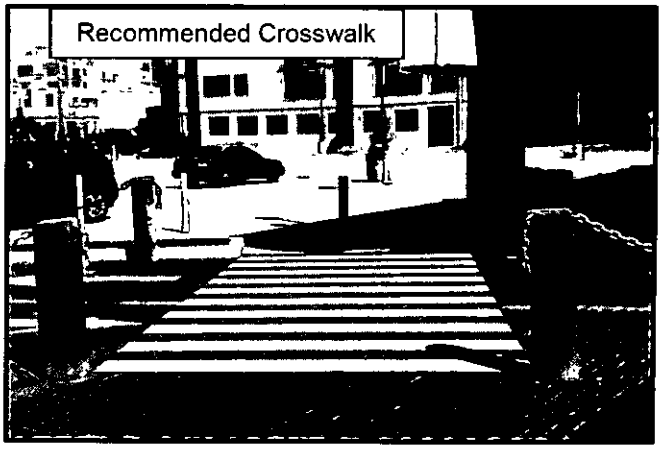
- Utilize more traditionally designed signs that have greater familiarity;
- Relocate signage to increase the visibility of the pedestrian crossing signs; and,
- Utilize flashers to emphasize the signs.

Potential signs that may be used at marked pedestrian crossings include:



Either sign, or one yet to be considered, can be equipped with a flasher that is either pedestrian actuated or operated with a timer.

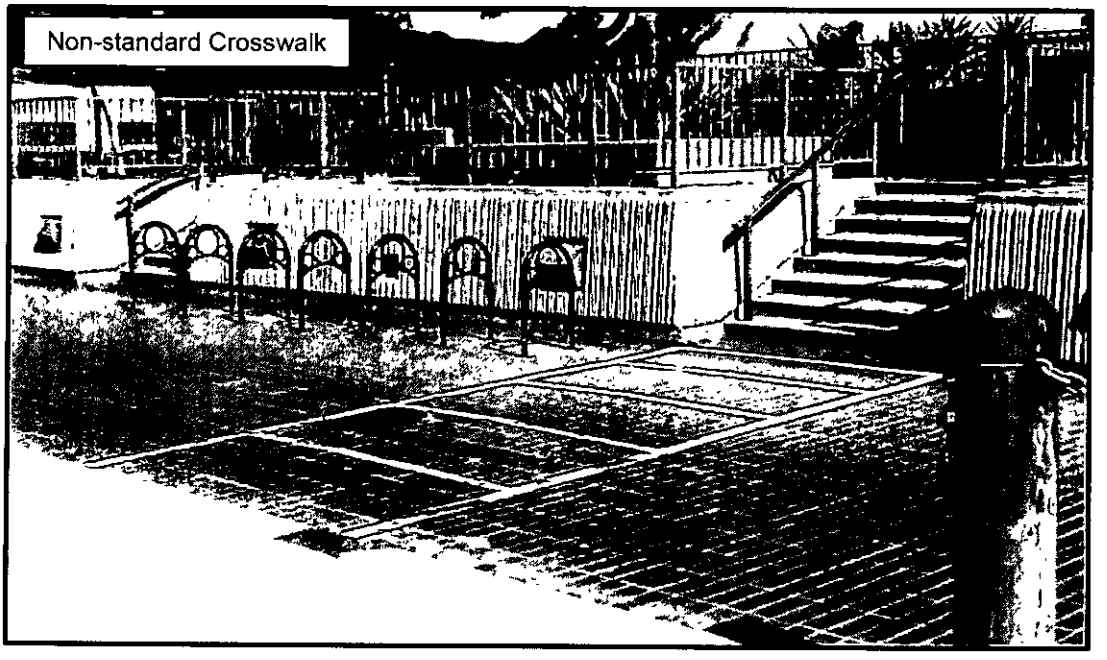
Additionally, pedestrian crosswalks vary in their design and locations, and are in many cases faded. Providing consistent crosswalk markings (size, design and location) will help provide better notification for cyclists of where pedestrians may be present. It would also better guide pedestrians to the appropriate crossing locations and would help reduce unexpected pedestrian entrance onto the bike path. This issue can be mitigated by:

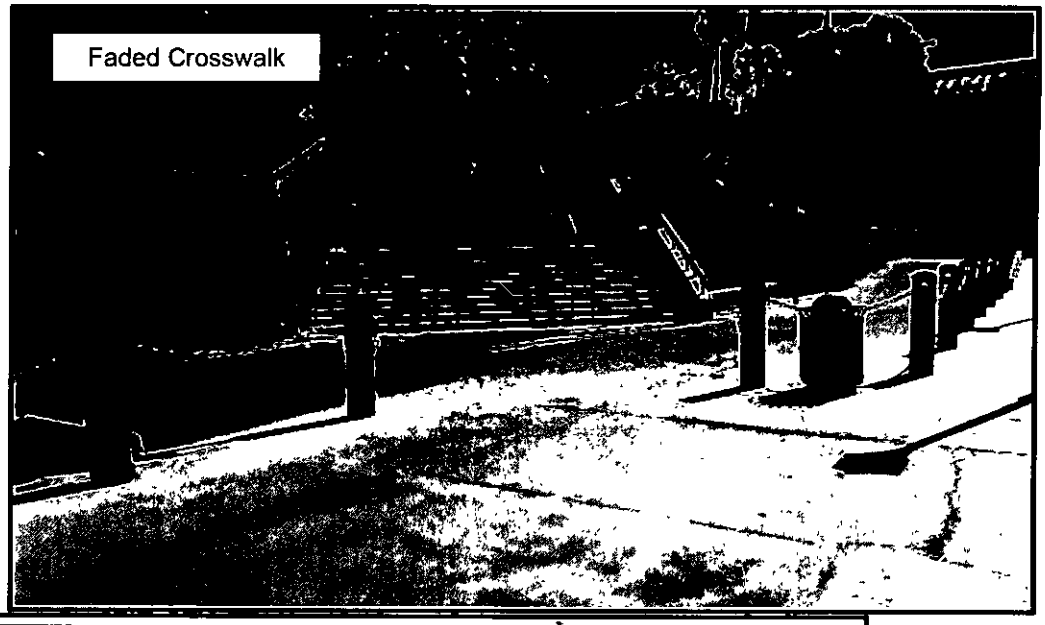


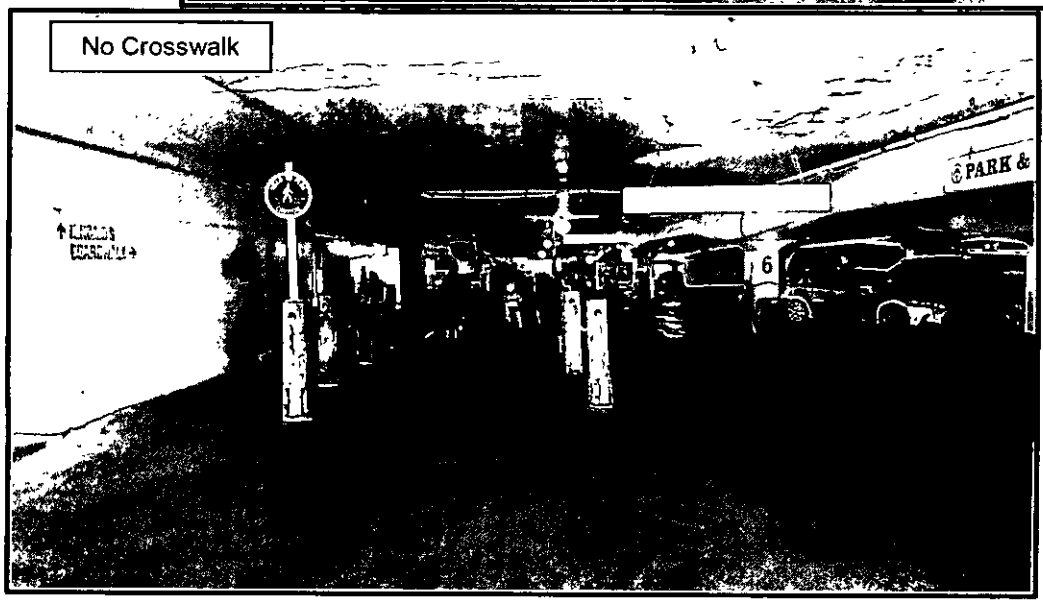

- Locate crosswalks at all locations where it is appropriate for pedestrians to cross the bike path;

- Repaint existing or install new crosswalks in a consistent manner, utilizing a high visibility continental design; and,

- Install pedestrian crossing ahead pavement markings on the bike path in advance of all crosswalks.

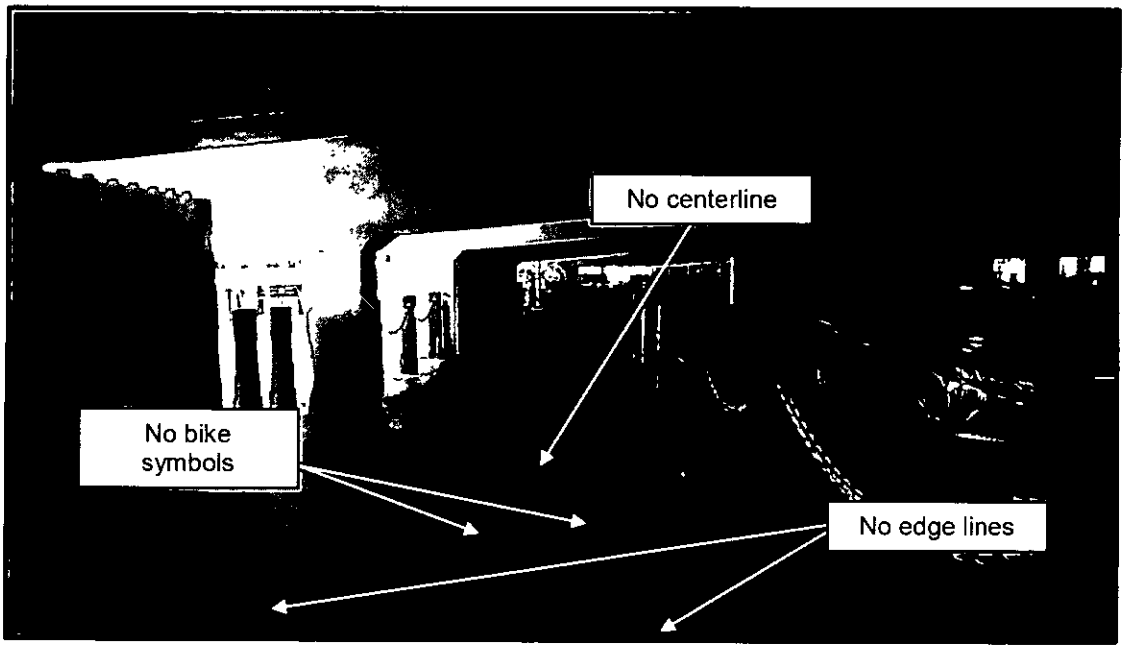


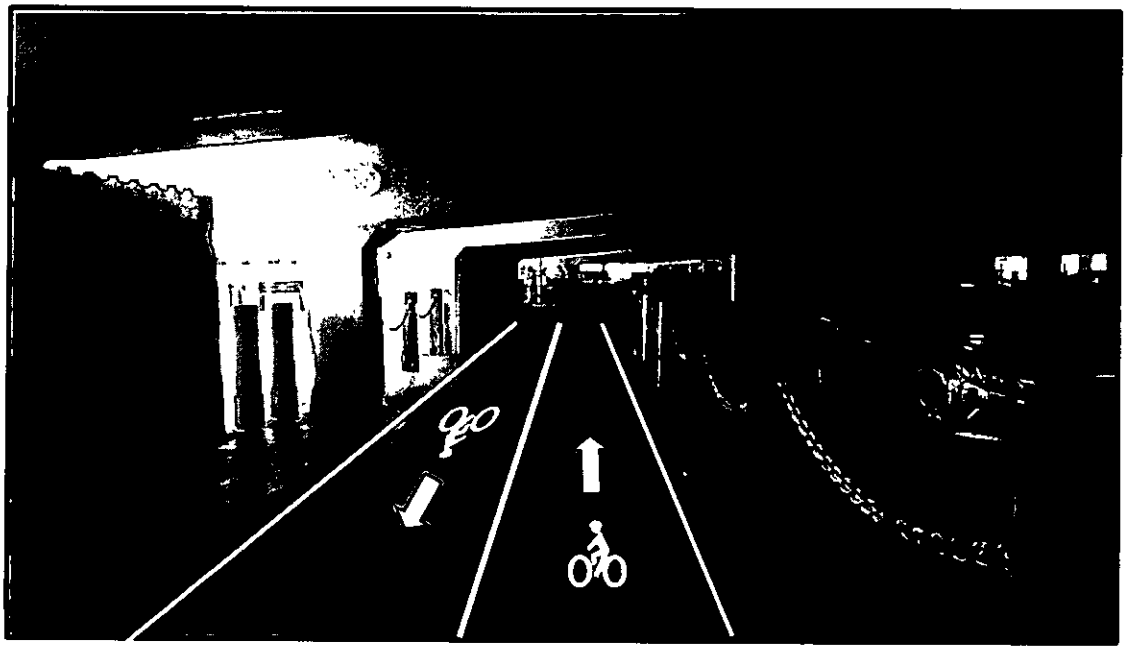

Faded Crosswalk


No Crosswalk
PARK &
6

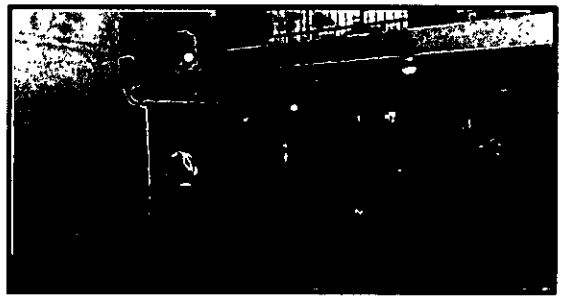
**Bike Path Markings**

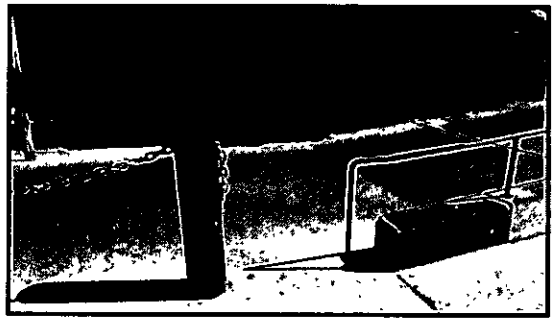
The centerlines striping, edge lines, bike path designation markings and other various markings on the bike path are faded, which reduces the guidance provided to cyclists. The lack of visible bicycle markings also reduces the visual notification to pedestrians that they are on a bicycle-only facility, which increases the undesirable occurrence of pedestrians walking on the bike path. To enhance safety and guidance, it would be beneficial to repaint these markings. In addition, installing additional markings, such as "PED XING AHEAD" in advance of the marked pedestrian crossings would enhance safety at these locations.



**Control Pedestrian Access to the Bike Path**





The bike path is designed as a bicycle-only facility, while pedestrians have adjacent or nearby facilities that are intended solely for their use as well. When pedestrians travel on the bike path, safety for both users is reduced and frustrations often occur. Due to the tourist nature of the Pier, many pedestrians are unfamiliar with the separate facilities and walk on the bike path due to confusion. This issue can be addressed by the following:

- Install and/or modify the signage and markings that guide pedestrians to facilities appropriate for their use;
- Reduce the width of pedestrian crossing areas to limit the occurrence of pedestrians mistakenly entering the bike path; and,
- Address openings in the existing pedestrian barriers that could be used by pedestrians to mistakenly enter the bike path.

## COORDINATION

This report has been coordinated between the Public Works and Information Technology Departments. Plan development will also be coordinated with the Police Department for input and consideration.

## FISCAL IMPACT

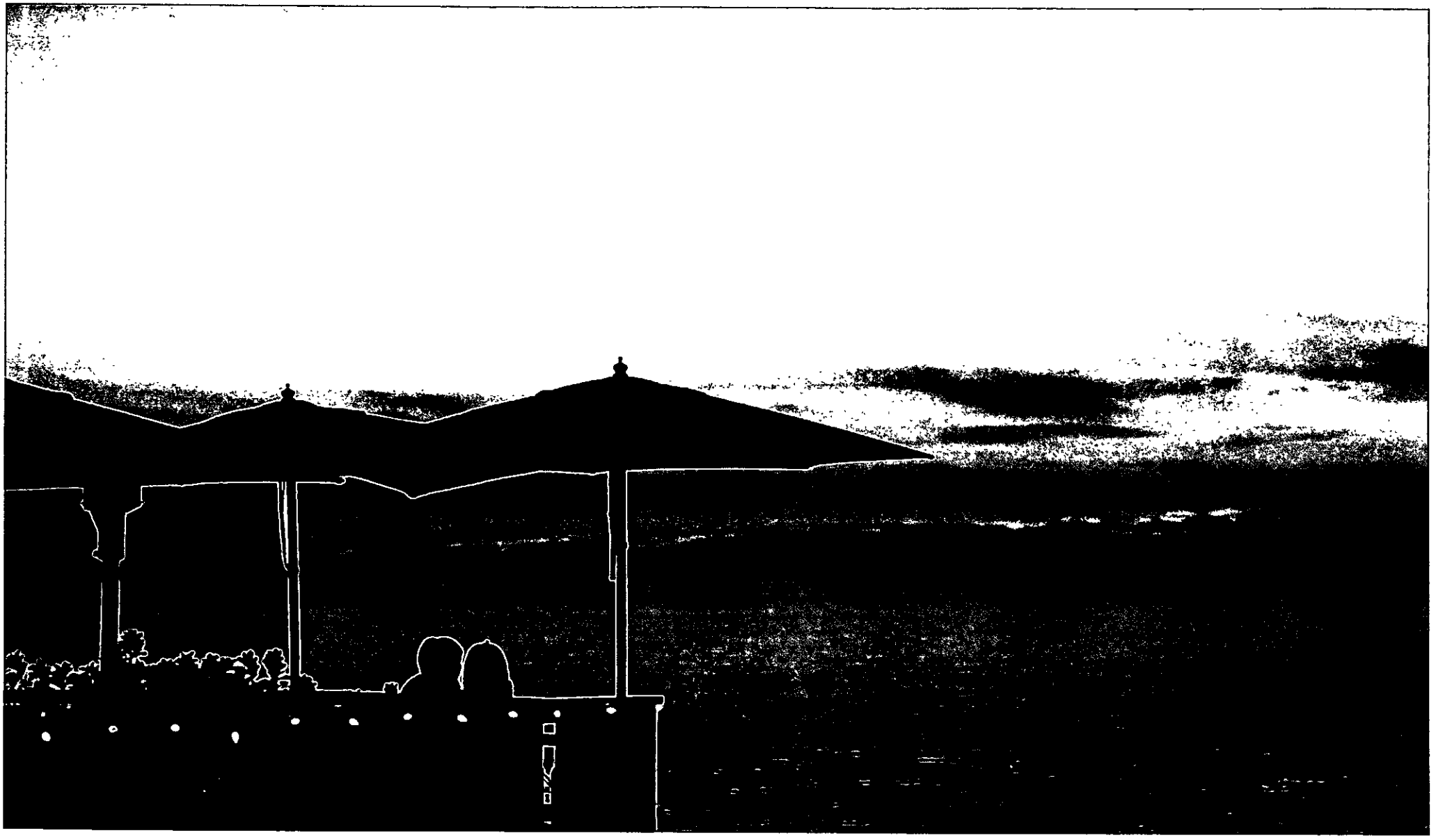
Staff is preparing conceptual designs for these enhancements for presentation to the appropriate Commissions and then to the City Council. The costs to install the recommended enhancements will be fully developed at that time. Funding to prepare the conceptual design is available in the Public Works Engineering Division operating budget.

Submitted by:
*Ted Semaan, Public Works Director*

Approved for forwarding by:
*Joe Hoefgen, City Manager*

jrydell

Attachments:
- Attachment 1 - Vicinity map
- Attachment 2 – Conceptual bike dismount layout

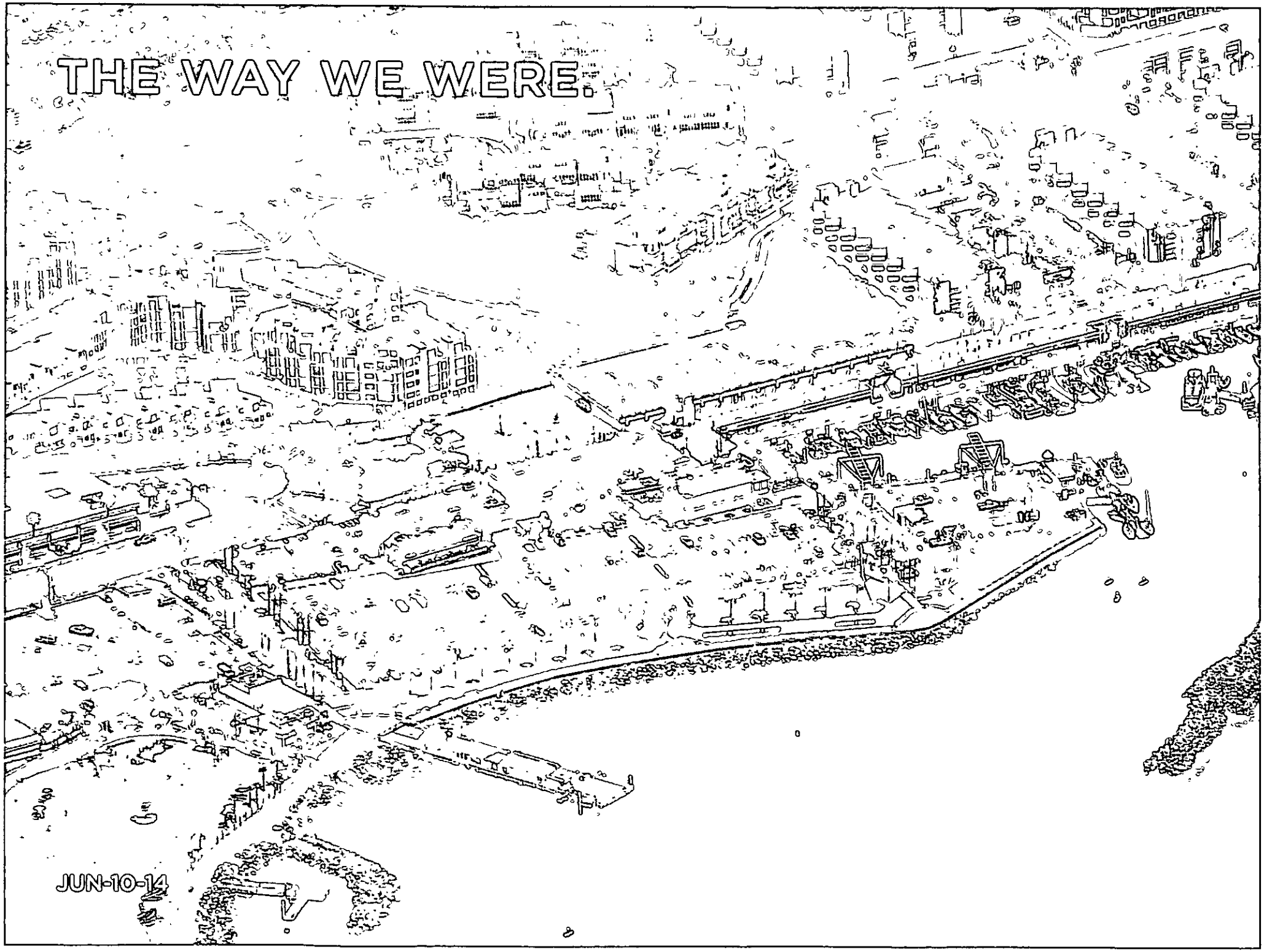


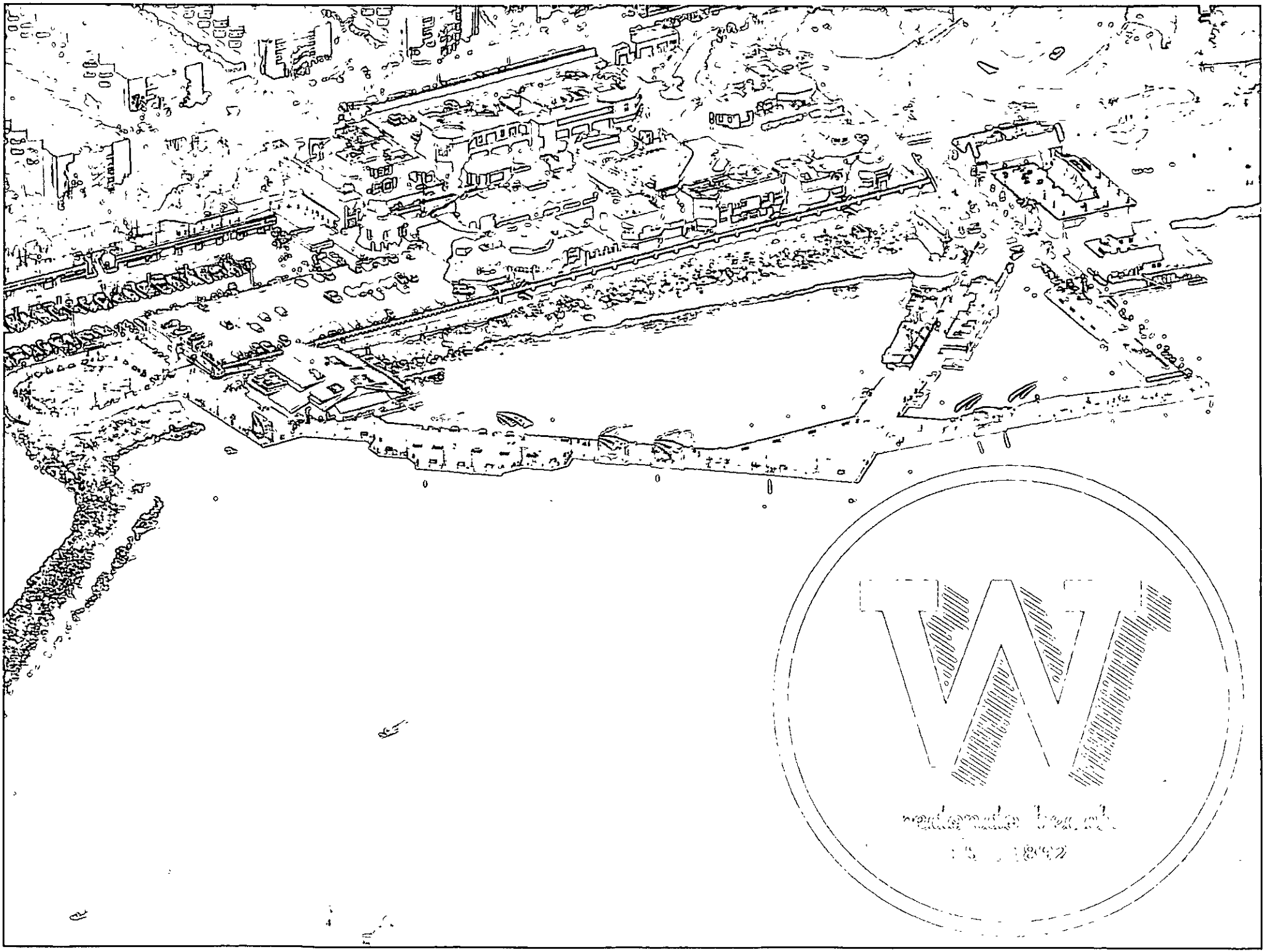
GOLDEN SAND.

SHIMMERING SUNSETS.

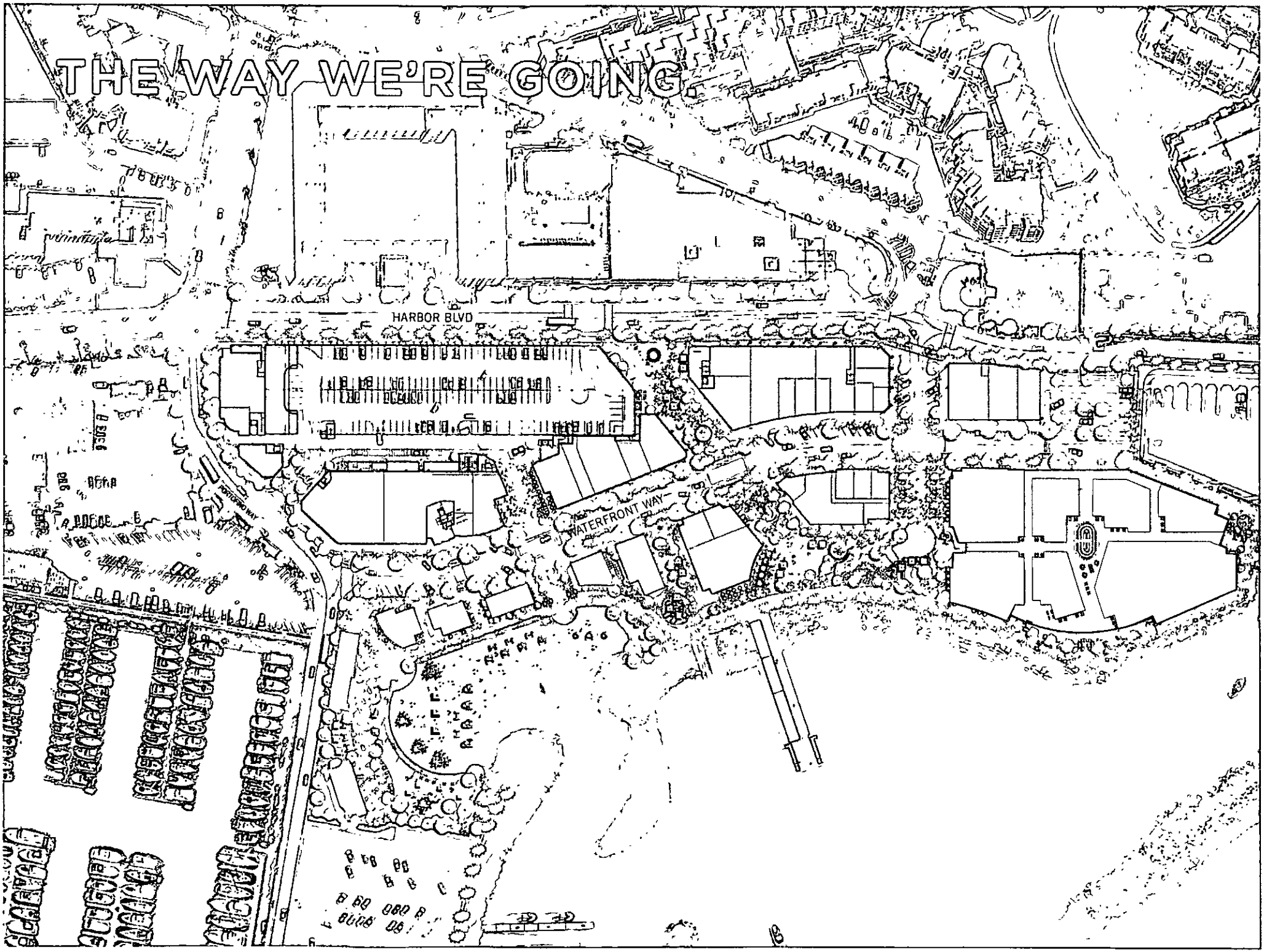
THE WATERFRONT: A MIXED USE COASTAL VILLAGE

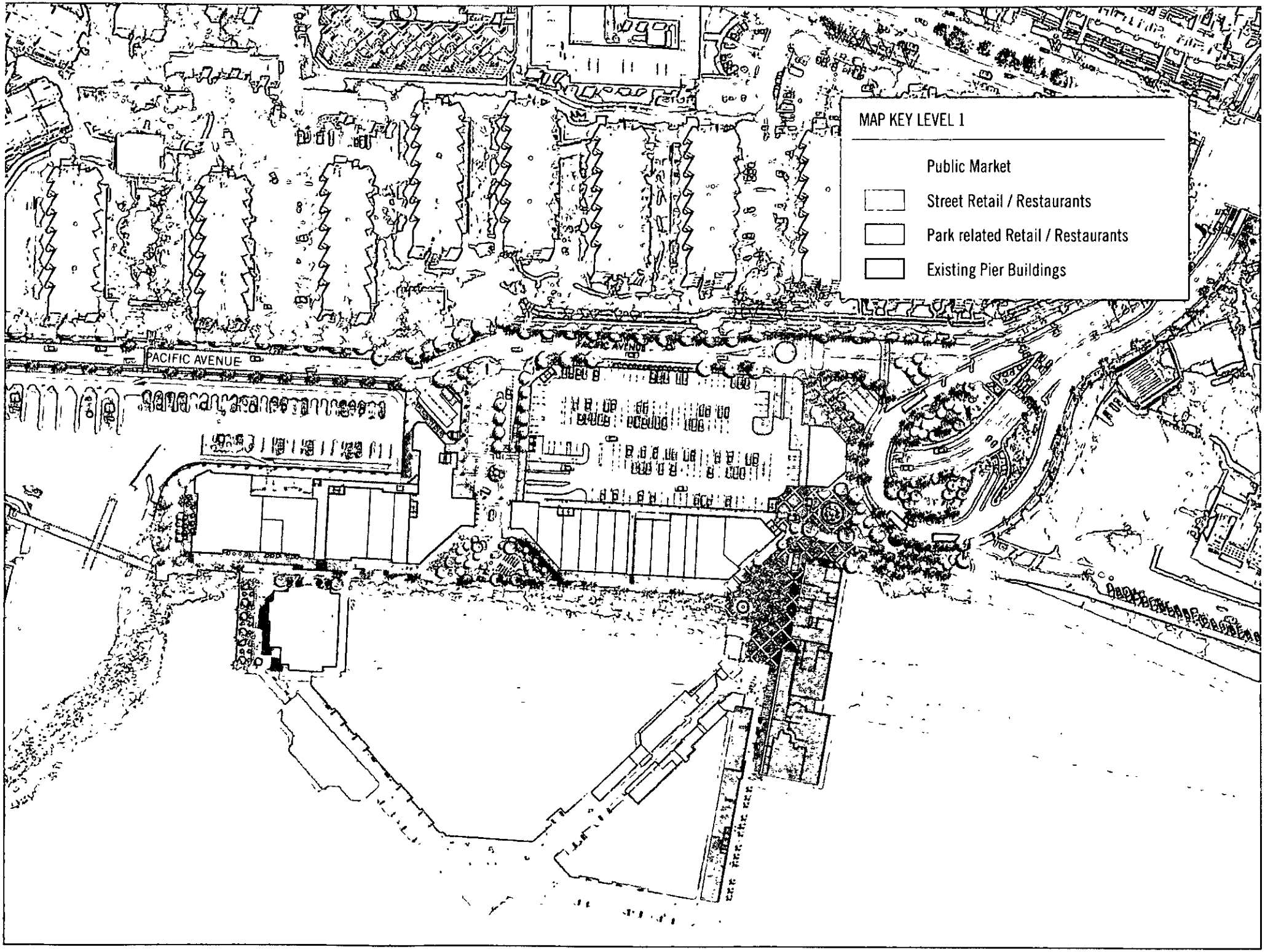
the
WATERFRONT
— redondo beach —

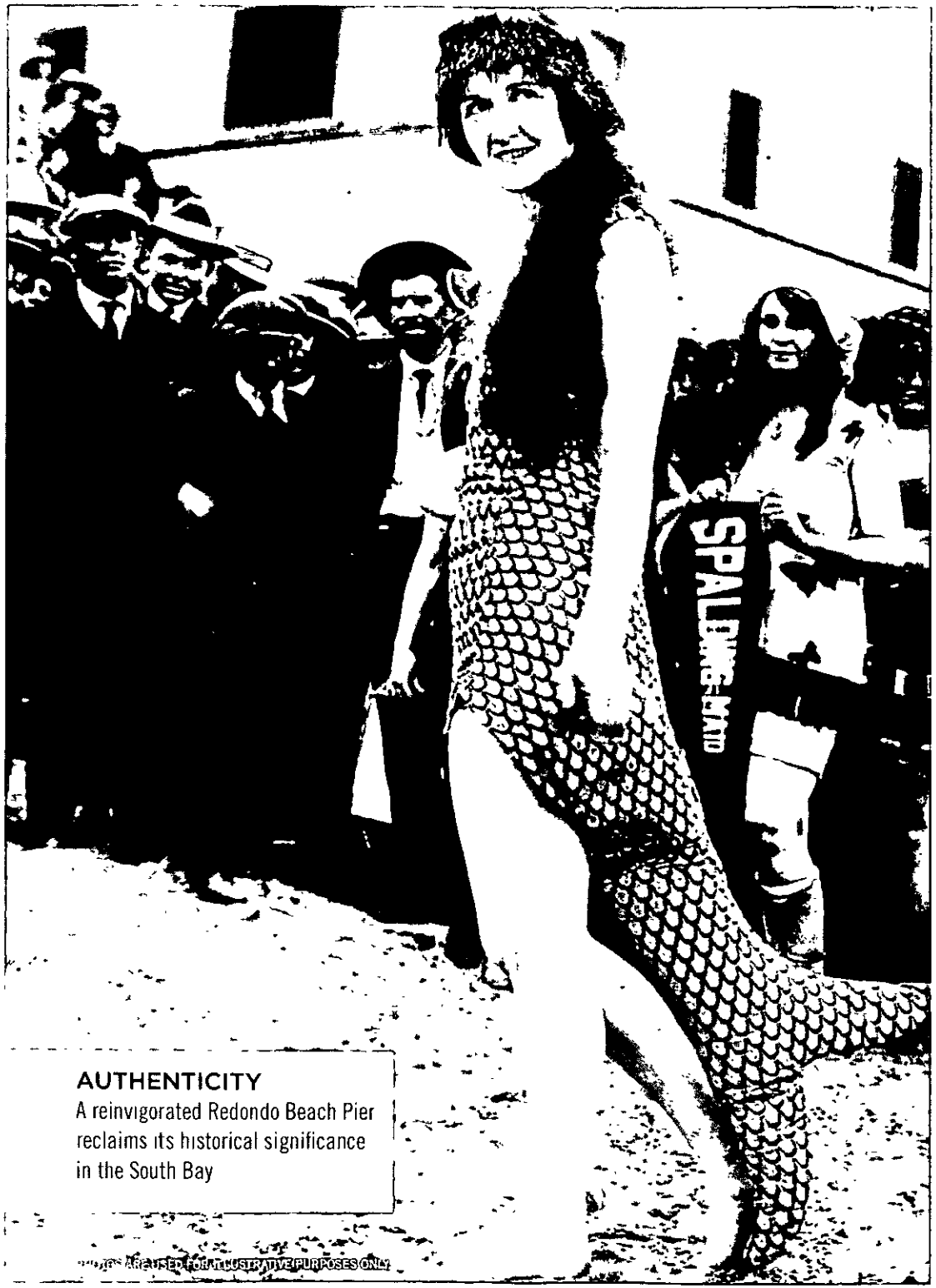

THE WAY WE WERE.
JUN-10-14



# THE WAY WE'RE GOING.




MAP KEY LEVEL 1
Public Market
Street Retail / Restaurants
Park related Retail / Restaurants
Existing Pier Buildings
PACIFIC AVENUE
PACIFIC AVENUE



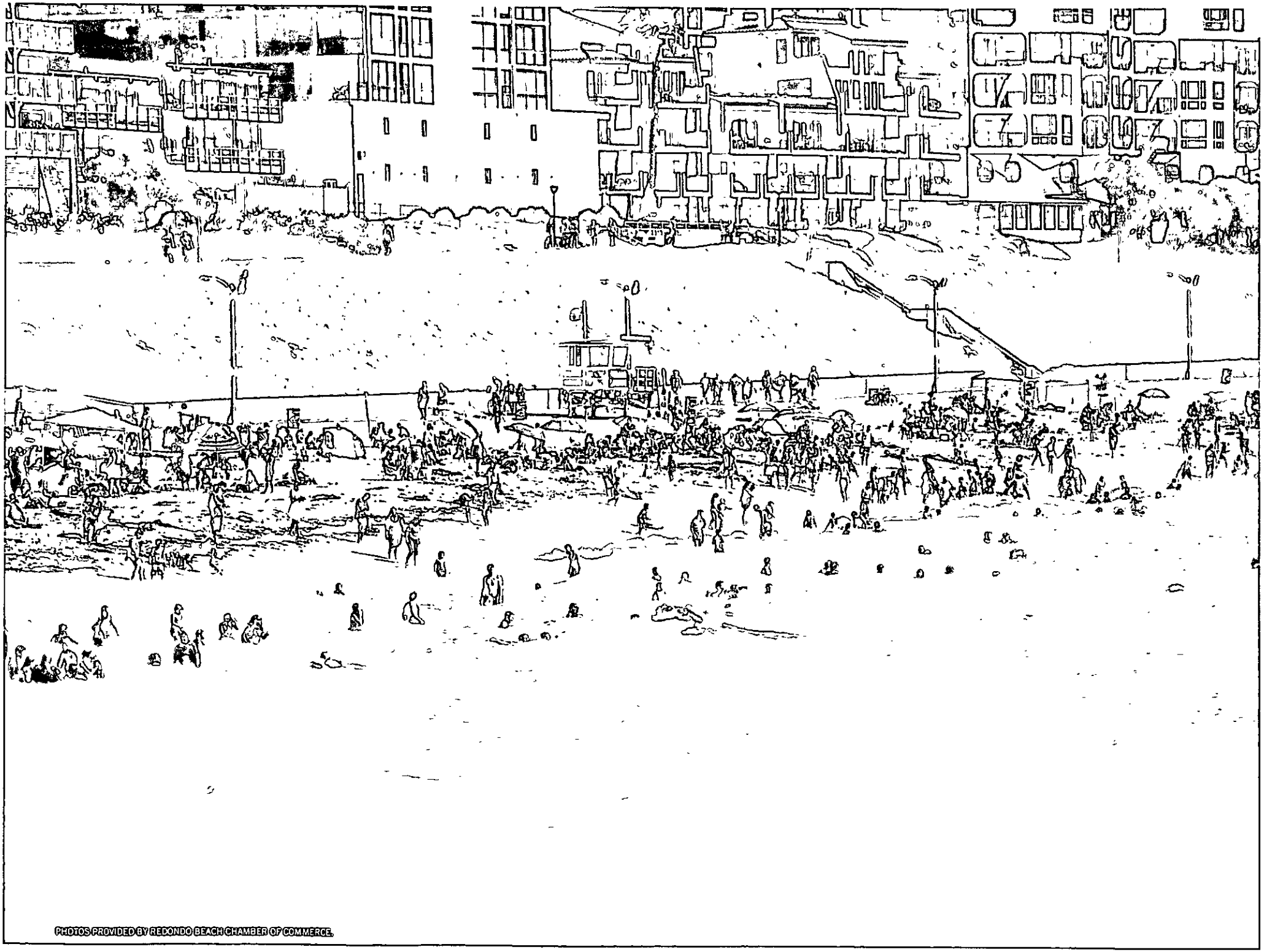

**AUTHENTICITY**
A reinvigorated Redondo Beach Pier reclaims its historical significance in the South Bay

IMAGES ARE USED FOR ILLUSTRATIVE PURPOSES ONLY

# REDONDO BEACH'S WARM, INVITING SAND, THE IRRIDESCENT SUNSETS OF THE PACIFIC OCEAN, AND THE SITES OWN ICONIC PIER PRESENT *THE* IDYLLIC BACKDROP.

CenterCal's transformational project, The Waterfront, will be the premier shopping, dining, and lifestyle destination in the South Bay. Nestled in the heart of the Los Angeles Metro area are some of the nation's most compelling beach communities that include Manhattan Beach and Palos Verdes.

Graced with exhilarating natural beauty and unique historic foundations, this 36-acre seaside project will attract throngs of locals, office workers, and tourists seeking its myriad of enriching offerings set in a breathtaking and authentic beach-town environment.



PHOTOS PROVIDED BY REDONDO BEACH CHAMBER OF COMMERCE.

# A NEW LIFESTYLE EXPERIENCE

In a time when consumers and brands alike crave impactful alternatives to interactions online or in contrived, cookie-cutter settings, the experience at The Waterfront will tap into the potential of the South Bay by answering many of the long-unmet lifestyle needs and wants of its community.

The project investment is estimated at $300M and will create a next-generation lifestyle environment: a modern waterfront experience that meets the evolving desires of today's consumers, while preserving the charm and authenticity of the historic pier and waterfront.

# ENGAGE

Convenient and comfortable. The Waterfront offers a distinctive collection of unique and essential goods, services, and lifestyle amenities.

## 12 ACRES OF RECREATION

parks and open space featuring open-air concerts, art exhibits, children's play areas, and pedestrian/bike paths

## PUBLIC LAGOON

with multi-generational water sports and beach activities

## MARKET HALL

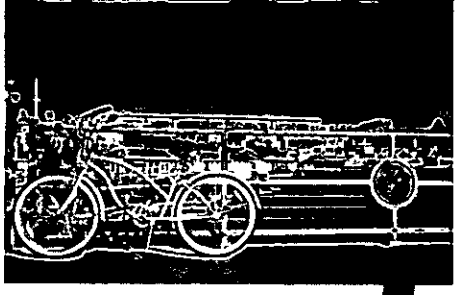
featuring local purveyors of the freshest Southern California fare

## BEST-IN-CLASS

health, beauty, and lifestyle amenities tailored to the South Bay lifestyle

## RETAIL/RESTAURANT

hand-picked to resonate with the sophisticated, yet laid-back culture of the South Bay



## HISTORIC PIER

restored and positioned with family-friendly offerings

## BOUTIQUE HOTEL

120-room oceanfront hotel with spa and beauty services

## CREATIVE OFFICE SPACE

with approximately of 50,000 sf of state-of-the-art innovative space

# SHOP

With its central-coastal location, The Waterfront offers a more relevant, convenient, and compelling environment for distinctive brands to reach the exceptional consumers who have chosen to live/work/play just steps from the beach.

**STREET RETAIL**
Unique retailers placed in a sophisticated yet laid-back environment

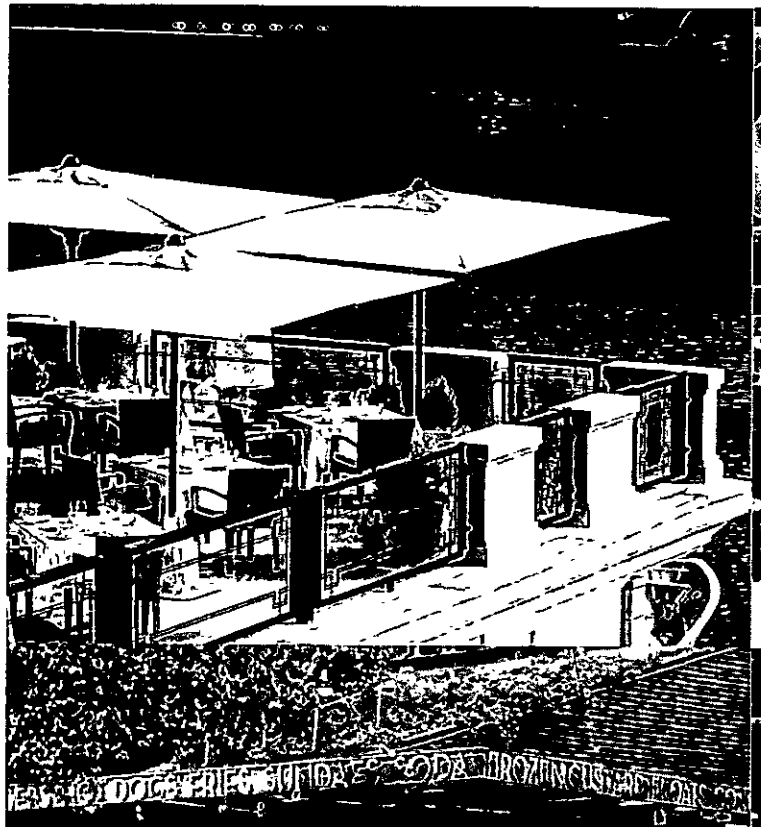
**EXCLUSIVE**
Local and regional merchants including Waterfront legacy tenants

PHOTOS ARE USED FOR ILLUSTRATIVE PURPOSES ONLY.

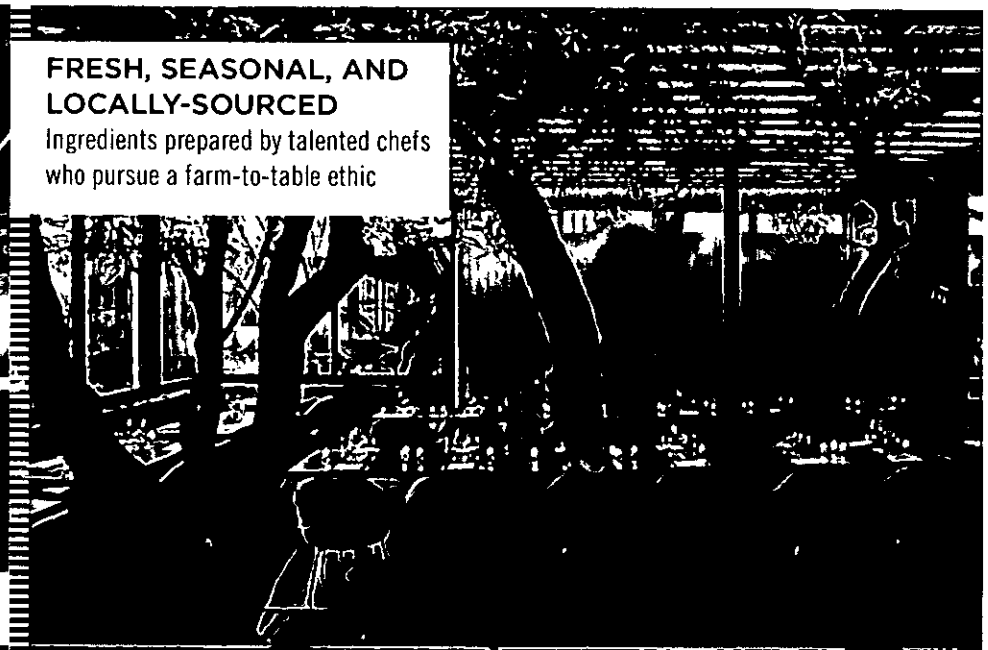
BEACH
BABE
ONE-OF-A-KIND
Shops, and established best-in-class brands
ATMOSPHERE
Beautifully landscaped paseos and walkways
PHOTOS ARE USED FOR ILLUSTRATIVE PURPOSES ONLY

# EAT

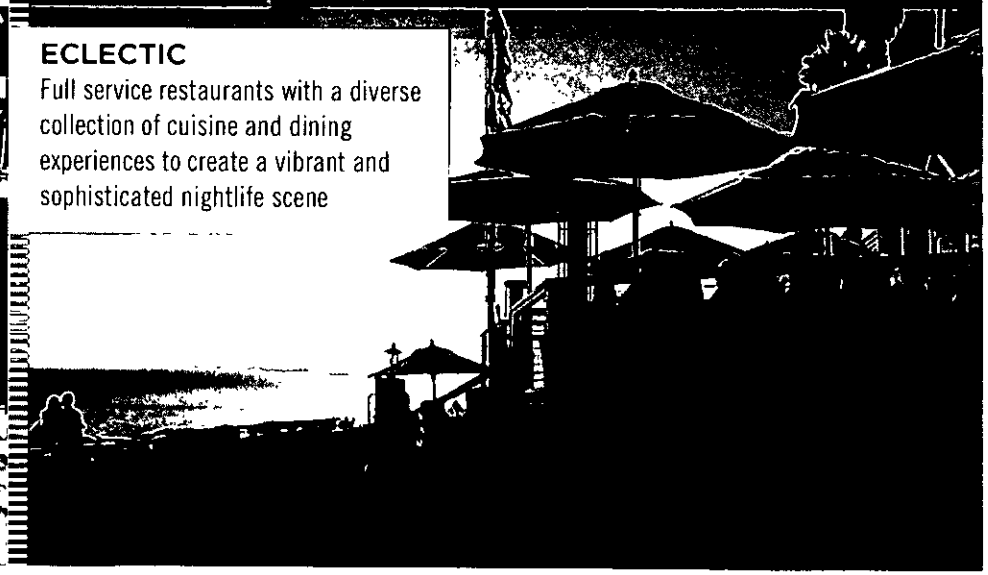
The Waterfront will draw local residents, office workers, and travelers to experience innovative dining in beautiful settings: cozy cafes, elevated-yet-relaxed restaurants, and open-air decks with views of sun, sea, and sky.

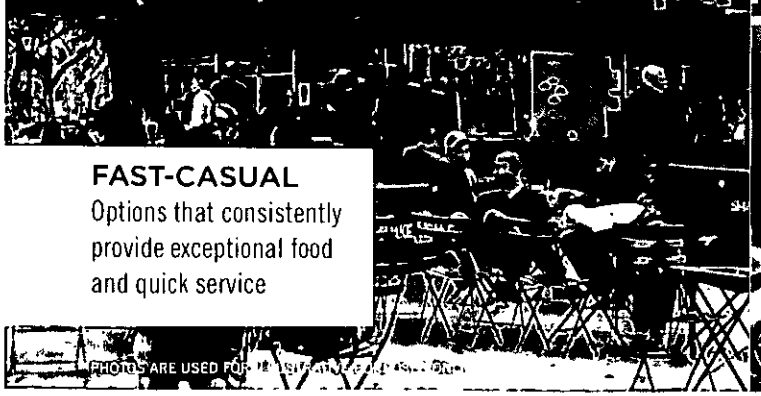


**FRESH, SEASONAL, AND LOCALLY-SOURCED**
Ingredients prepared by talented chefs who pursue a farm-to-table ethic



**ECLECTIC**
Full service restaurants with a diverse collection of cuisine and dining experiences to create a vibrant and sophisticated nightlife scene





**FAST-CASUAL**
Options that consistently provide exceptional food and quick service

PHOTOS ARE USED FOR

# MARKET

The Public Market will attract locals on a daily basis, and draw regional visitors as well as tourists from far and wide. Blending historic charm with modern urban energy, the Public Market will celebrate the abundance of California.

**ARTISAN**
Bakeries, butchers and charcuteries

**FRESH**
Fishmongers and regional farmers

**HOME GROWN**
Local purveyors of the finest fresh seafood, meats and organic produce

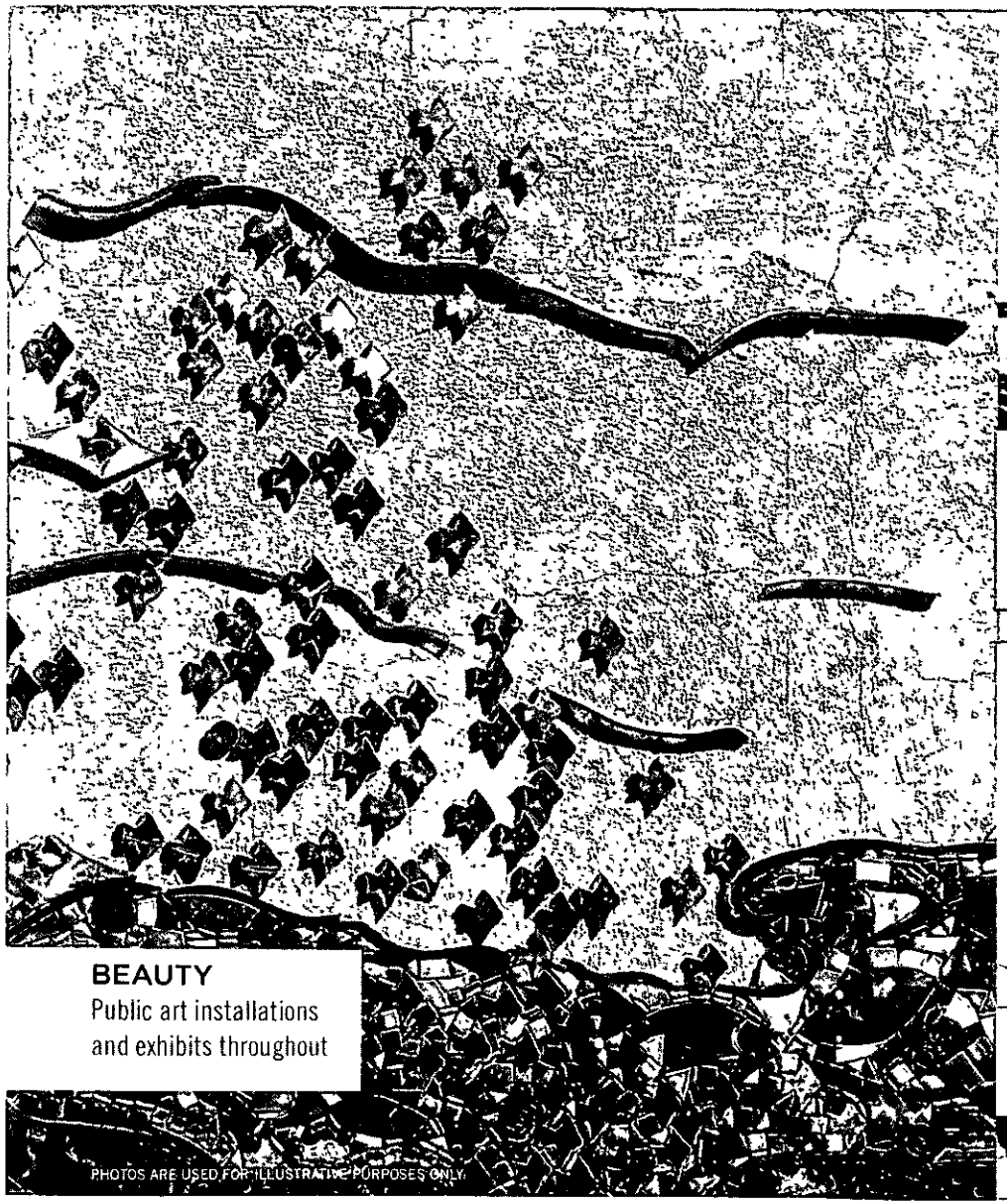
**LOCAL**
California wine merchants and craft breweries

**LEGACY**
Current Redondo Beach Waterfront tenants

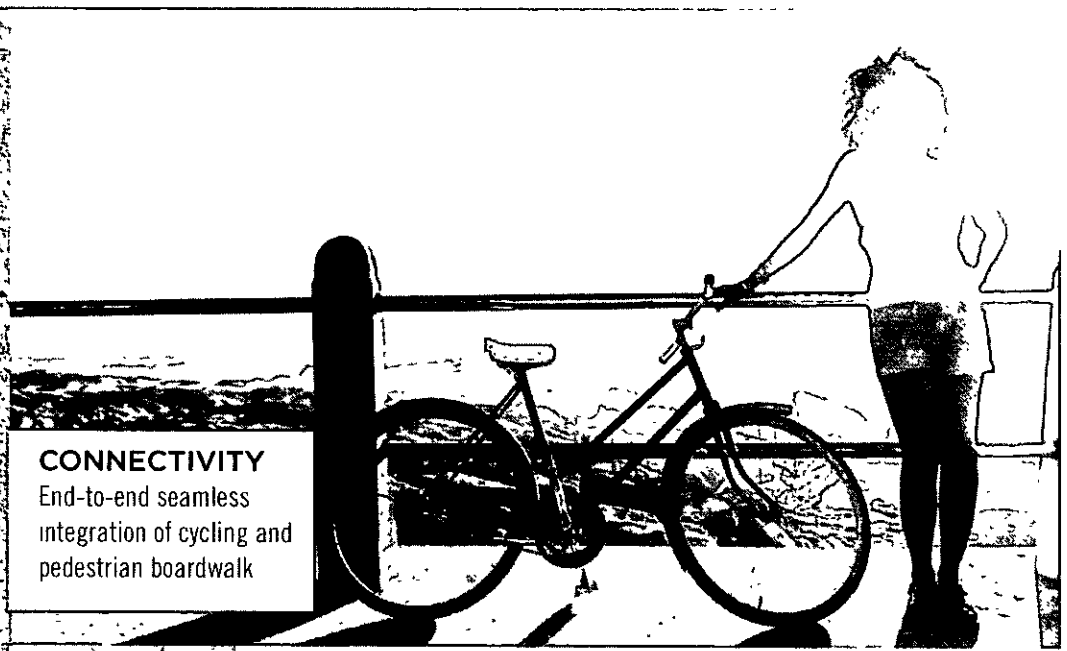
ILLUSTRATIVE PURPOSES ONLY.

# CONNECT

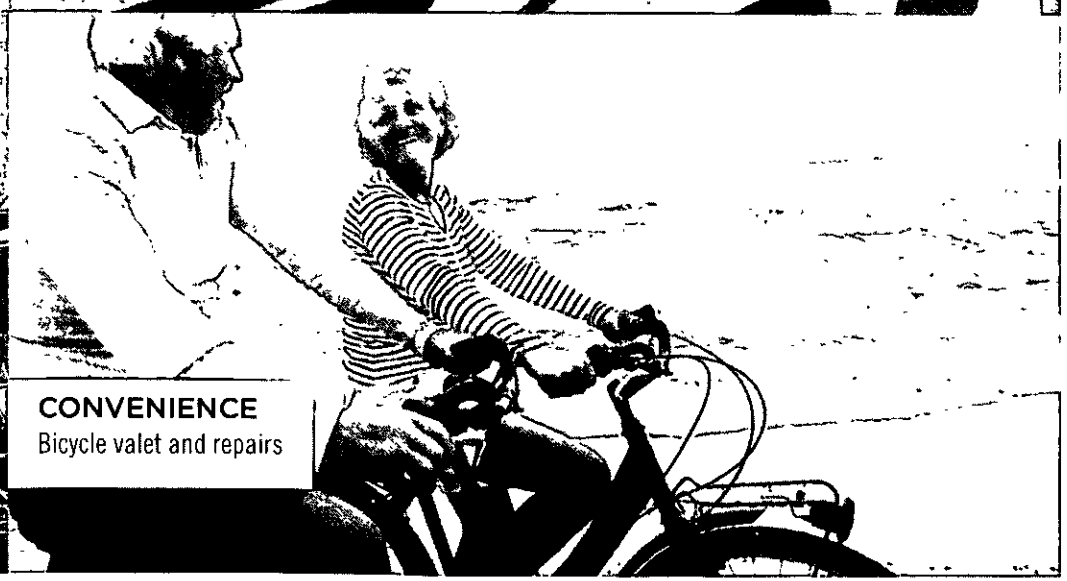
A hub of social vitality for the people who choose to live in these affluent communities. The beach lifestyle combined with healthy amenities and retail environments is the perfect reprieve from the harsh L.A. traffic.



**BEAUTY**
Public art installations and exhibits throughout



**CONNECTIVITY**
End-to-end seamless integration of cycling and pedestrian boardwalk



**CONVENIENCE**
Bicycle valet and repairs

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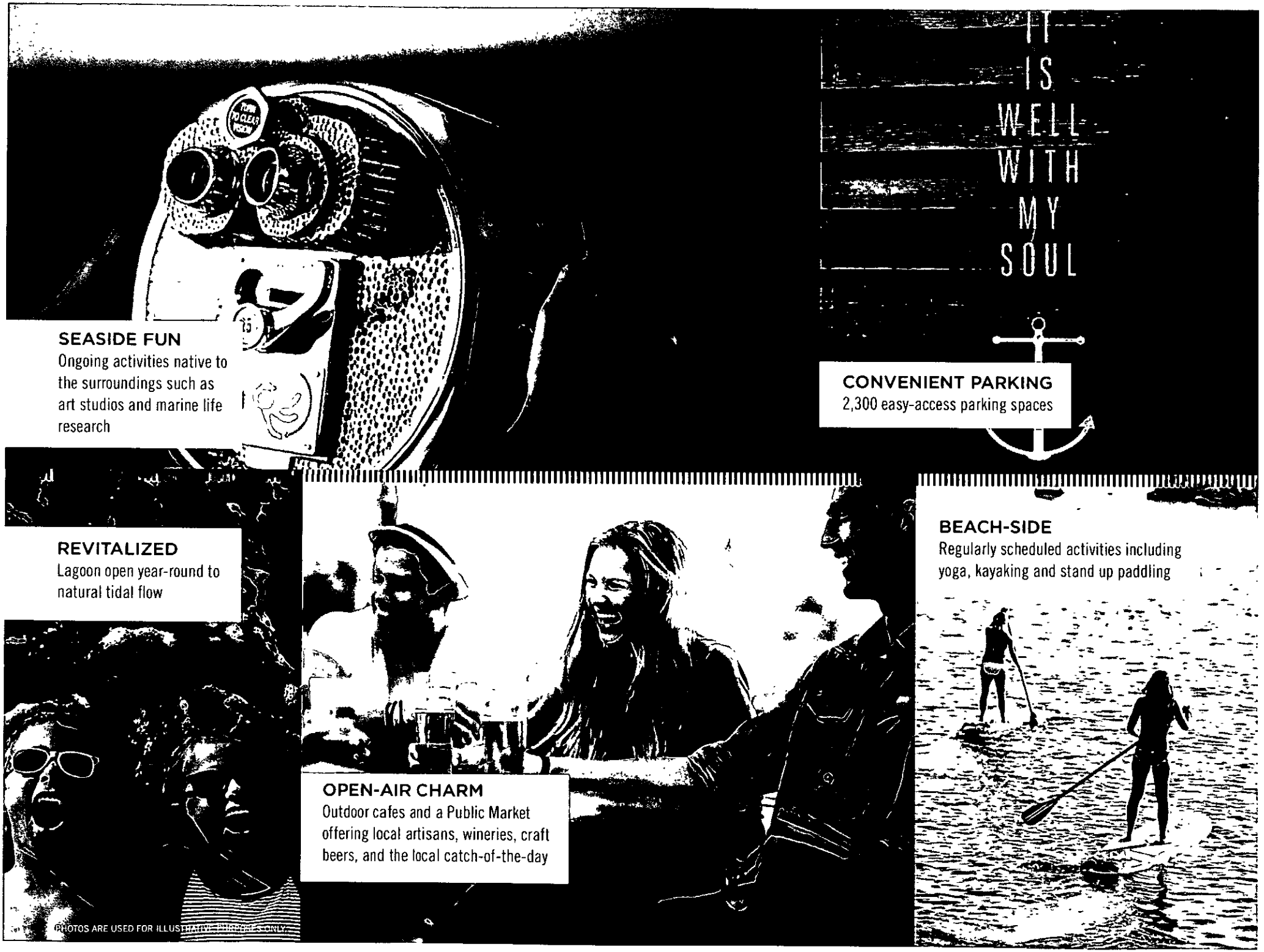
# IT IS WELL WITH MY SOUL



**SEASIDE FUN**
Ongoing activities native to the surroundings such as art studios and marine life research

**CONVENIENT PARKING**
2,300 easy-access parking spaces

**REVITALIZED**
Lagoon open year-round to natural tidal flow

**OPEN-AIR CHARM**
Outdoor cafes and a Public Market offering local artisans, wineries, craft beers, and the local catch-of-the-day

**BEACH-SIDE**
Regularly scheduled activities including yoga, kayaking and stand up paddling

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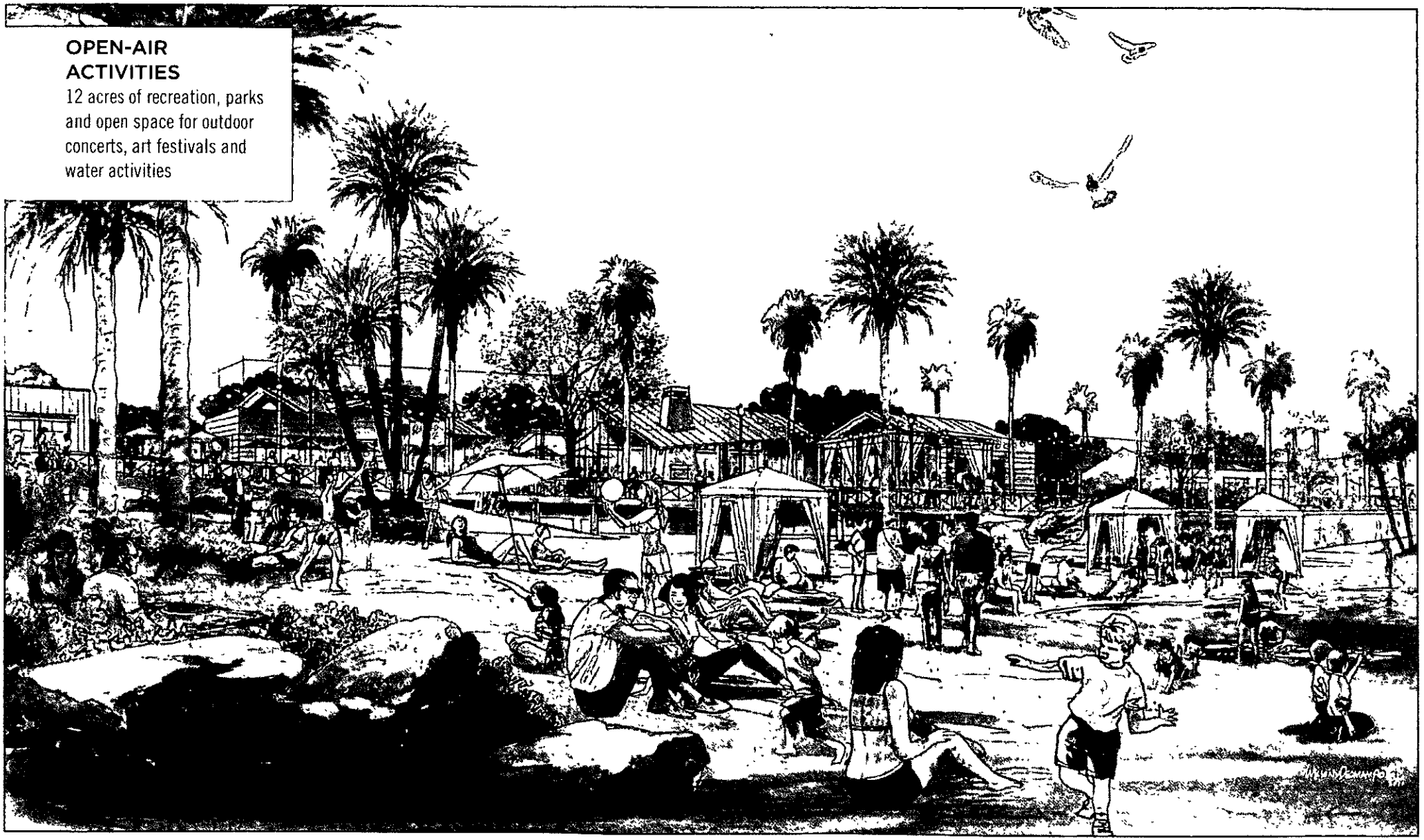
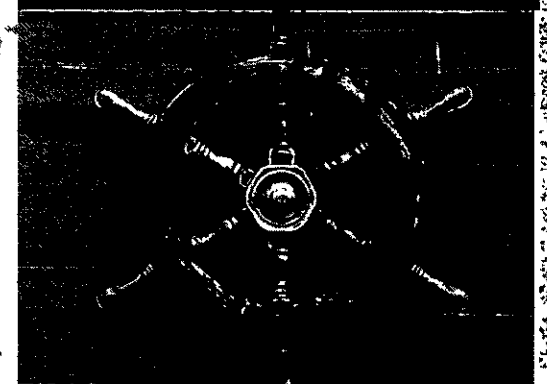
# PLAY

Sun, fresh air and the natural beauty of the site create a perfect backdrop for recreation with acres of parks, water features and open space.



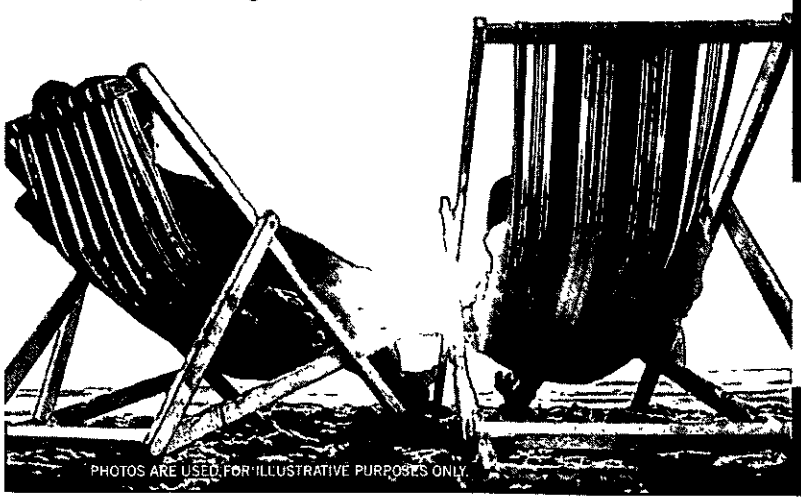
**OPEN-AIR ACTIVITIES**

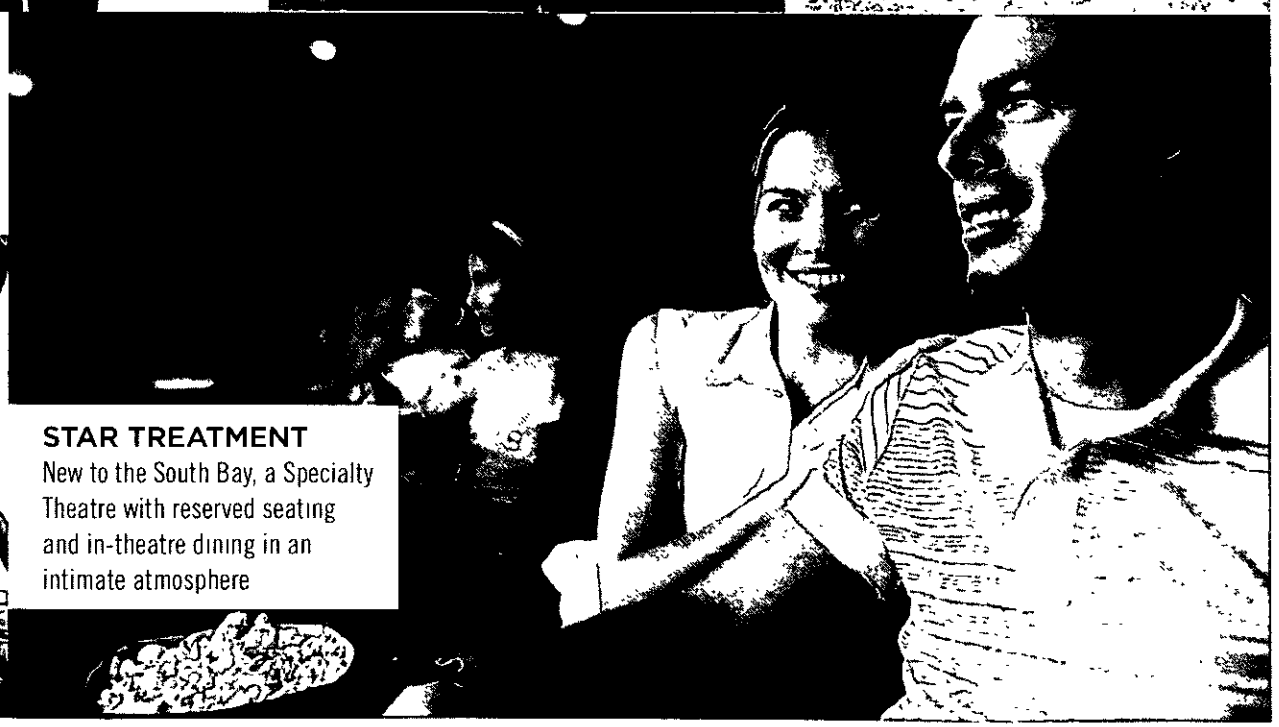
12 acres of recreation, parks and open space for outdoor concerts, art festivals and water activities



**EXPANDED**
Huge, 20-foot wide boardwalk enhances the Pacific Ocean experience and views

**MULTI-GENERATIONAL**
Parks and water amenities designed for the entire family to experience together





**STAR TREATMENT**
New to the South Bay, a Specialty Theatre with reserved seating and in-theatre dining in an intimate atmosphere

PHOTOS ARE USED FOR ILLUSTRATIVE PURPOSES ONLY.

# STAY

The perfect southern California escape, guests can enjoy breezy ocean-view rooms overlooking the sparkling waters of the Pacific Ocean.

**SOAK IN**
The four-star boutique oceanfront hotel experience with 120 guest rooms

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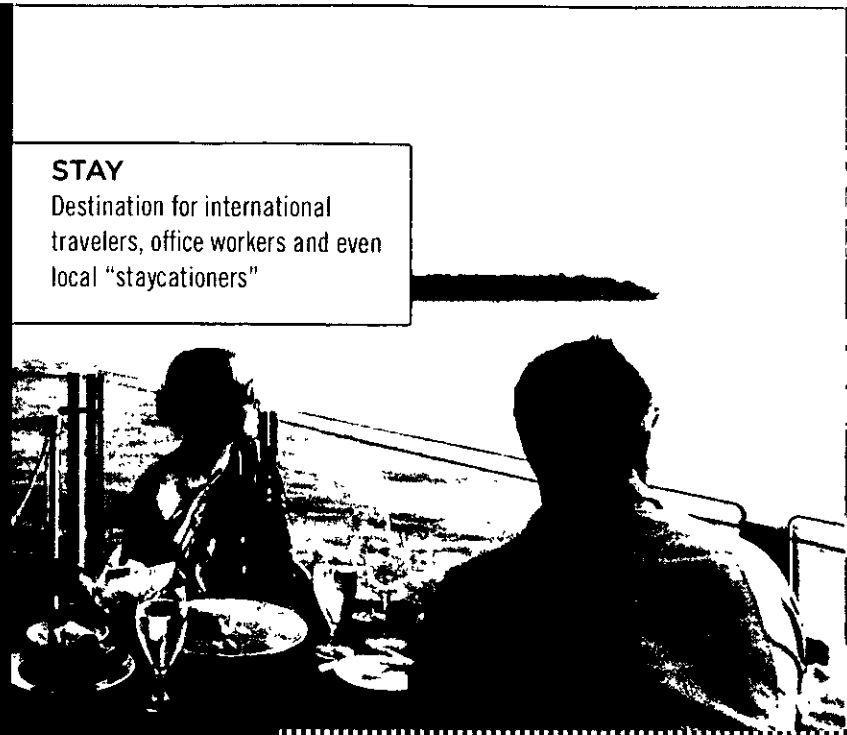
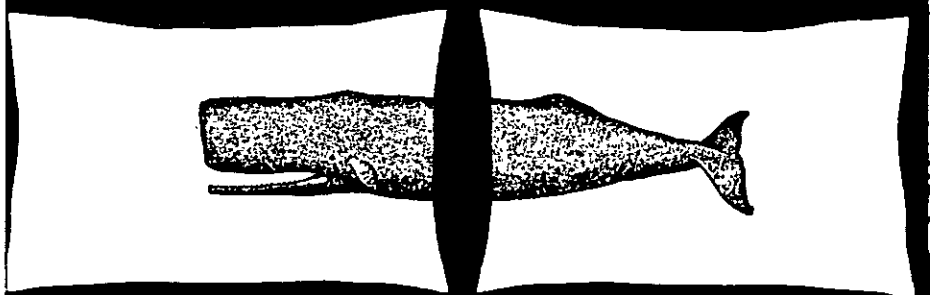
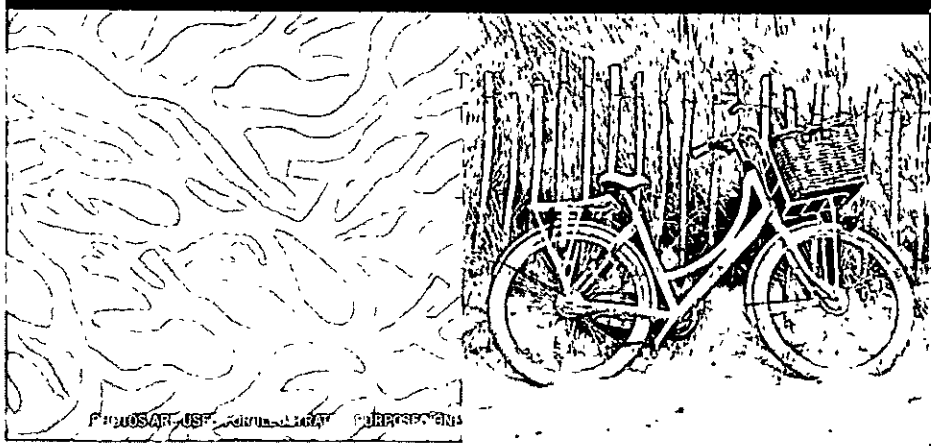
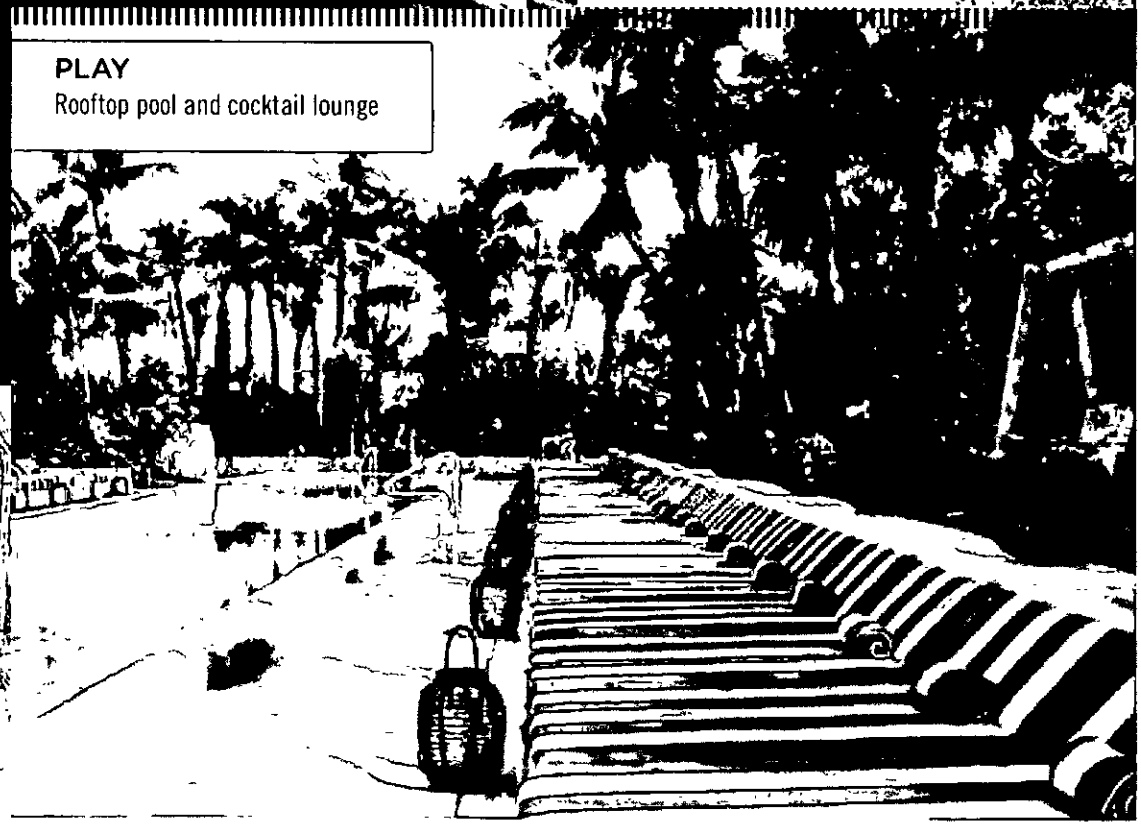
**RELAX**
Spa and beauty services



**STAY**
Destination for international travelers, office workers and even local "staycationers"



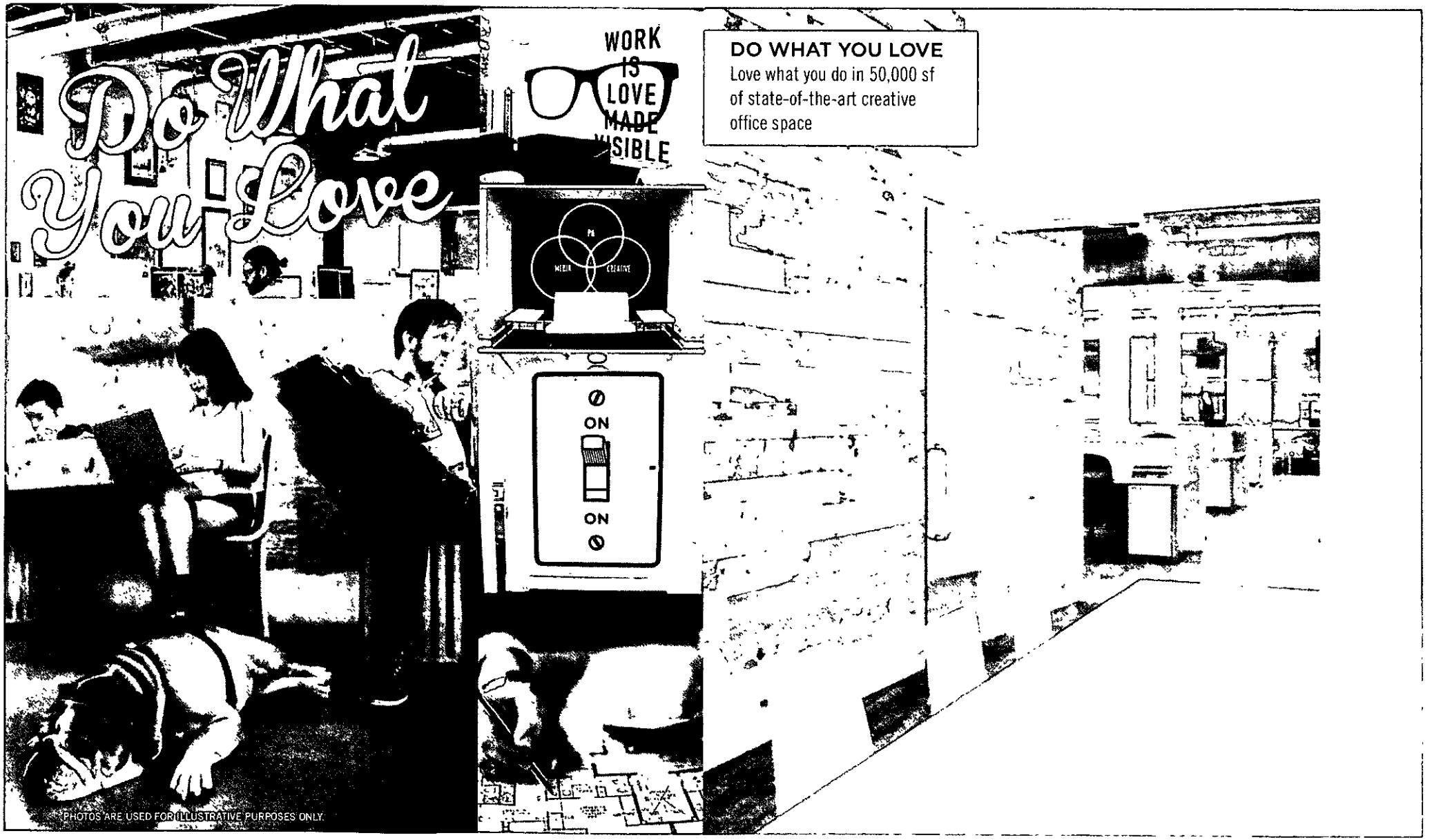




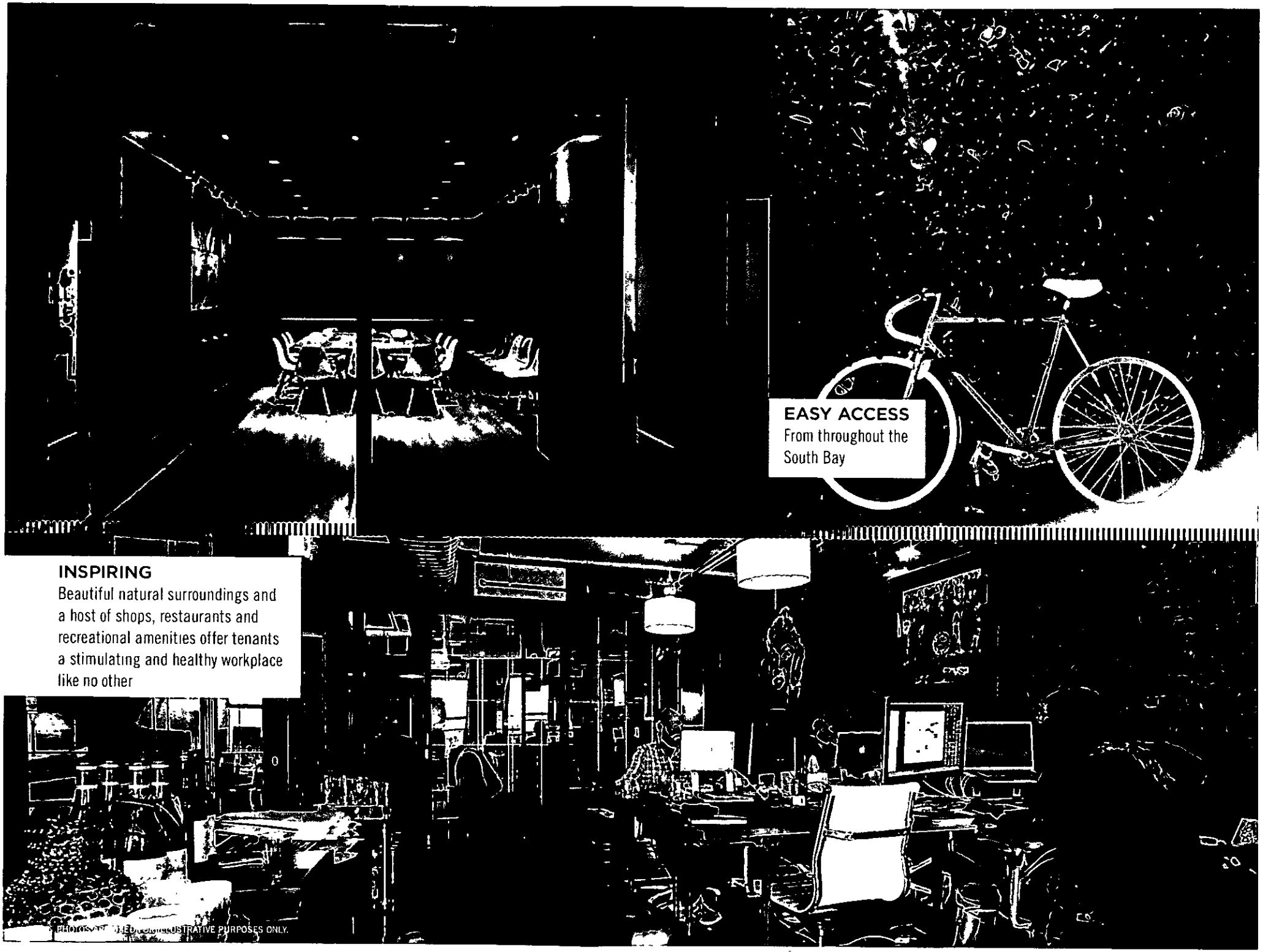
**PLAY**
Rooftop pool and cocktail lounge

# CREATE

Creative industries have become an economic force throughout the South Bay, commonly referred to as the new Silicon Beach. Offices are designed to attract cutting-edge companies in the fields of design, technology, media and new media, advertising, e-commerce and entertainment.




**DO WHAT YOU LOVE**
Love what you do in 50,000 sf of state-of-the-art creative office space

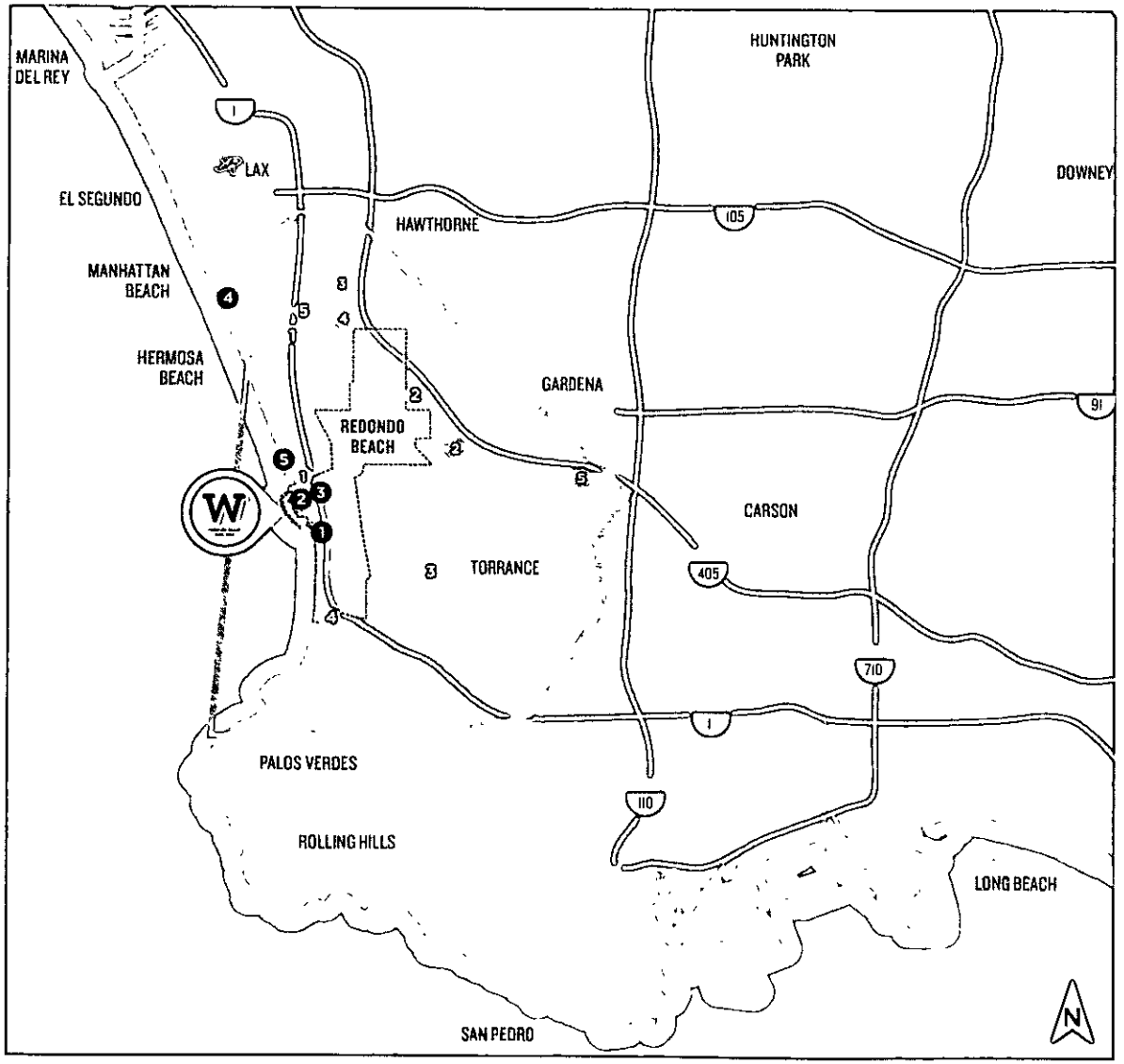


**EASY ACCESS**
From throughout the South Bay

**INSPIRING**
Beautiful natural surroundings and a host of shops, restaurants and recreational amenities offer tenants a stimulating and healthy workplace like no other

PHOTOS ARE USED FOR ILLUSTRATIVE PURPOSES ONLY.

# POINTS OF INTEREST
## WITHIN A 15 MINUTE DRIVE TIME




### SHOPPING

1. Manhattan Village
2. South Bay Galleria
3. Del Amo Fashion Center
4. Riviera Village
5. The Point/Plaza El Segundo

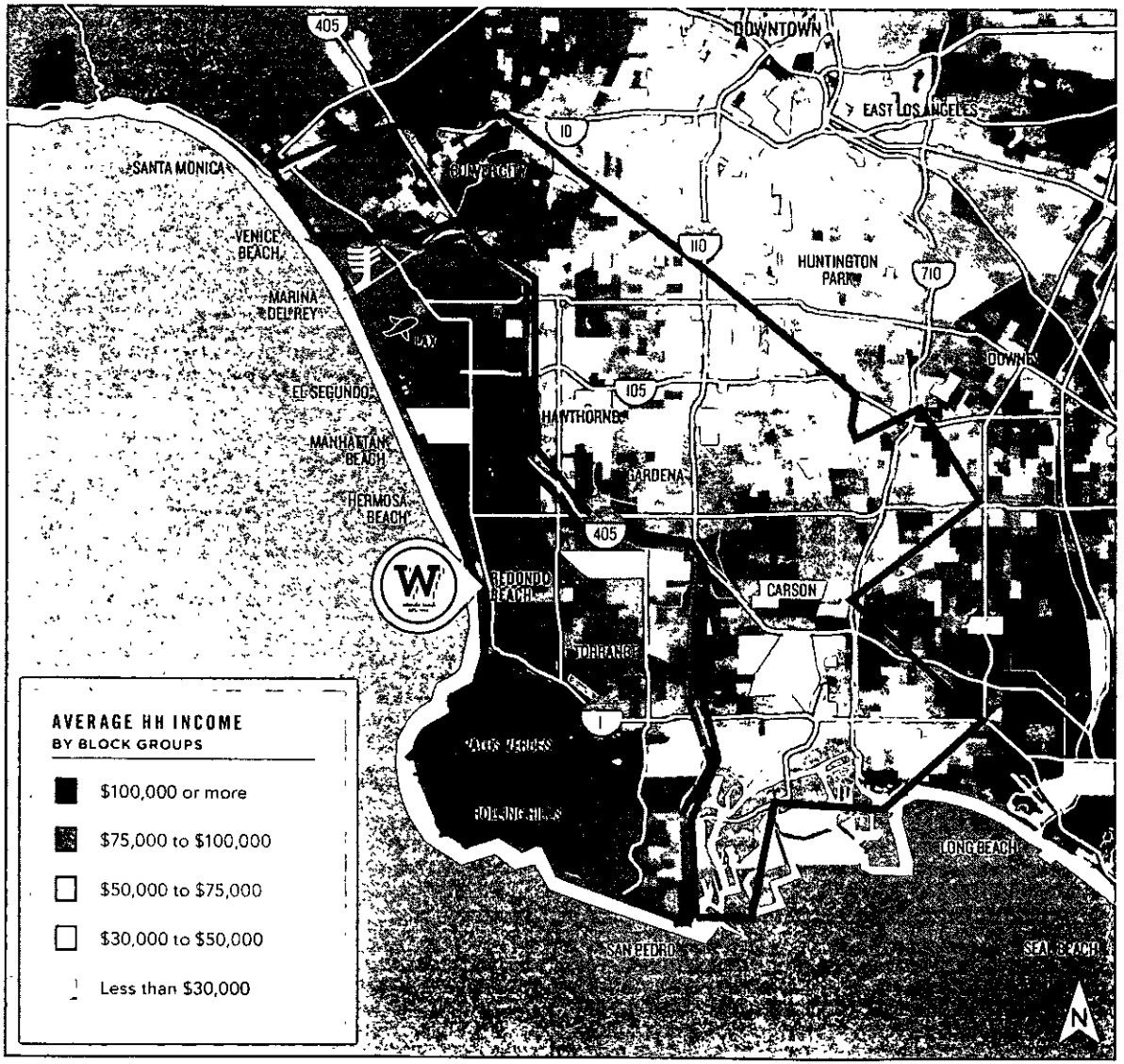
| HOTELS | # ROOMS |
|---|---|
| 1 Crowne Plaza Redondo Beach And Marina | 354 |
| 2 Portofino Hotel & Marina - A Noble House Hotel | 166 |
| 3 The Redondo Beach Hotel | 112 |
| 4 Shade Hotel (Opens Fall 2015) | 54 |
| 5 Beach House Hotel Hermosa Beach | 96 |

| EMPLOYERS | # EMPLOYEES |
|---|---|
| 1 City of Redondo Beach | 450 |
| 2 Boeing | 4,735 |
| 3 Raytheon | 7,302 |
| 4 Northrop Grumman (2 sites) | 5,827 |
| 5 Exxon Mobile Corp | 617 |

**TRADE AREA KEY**

- Redondo Beach City Boundary
- 20 Minute Drive Time Boundary

# DEMOGRAPHIC PROFILE
## PRIMARY AND SECONDARY TRADE AREAS




| | PRIMARY TRADE AREA | SECONDARY TRADE AREA |
|---|---|---|
| Population | 566,803 | 1,488,452 |
| Households | 223,115 | 471,720 |
| Median Age (Years) | 40.1 | 32.8 |
| Average Household Income | $117,190 | $64,215 |
| Median Household Income | $88,934 | $53,427 |
| Any College + | 48.5% | 21.9% |
| Total Employees | 329,067 | 498,534 |
| White Collar | 73.9% | 55.0% |

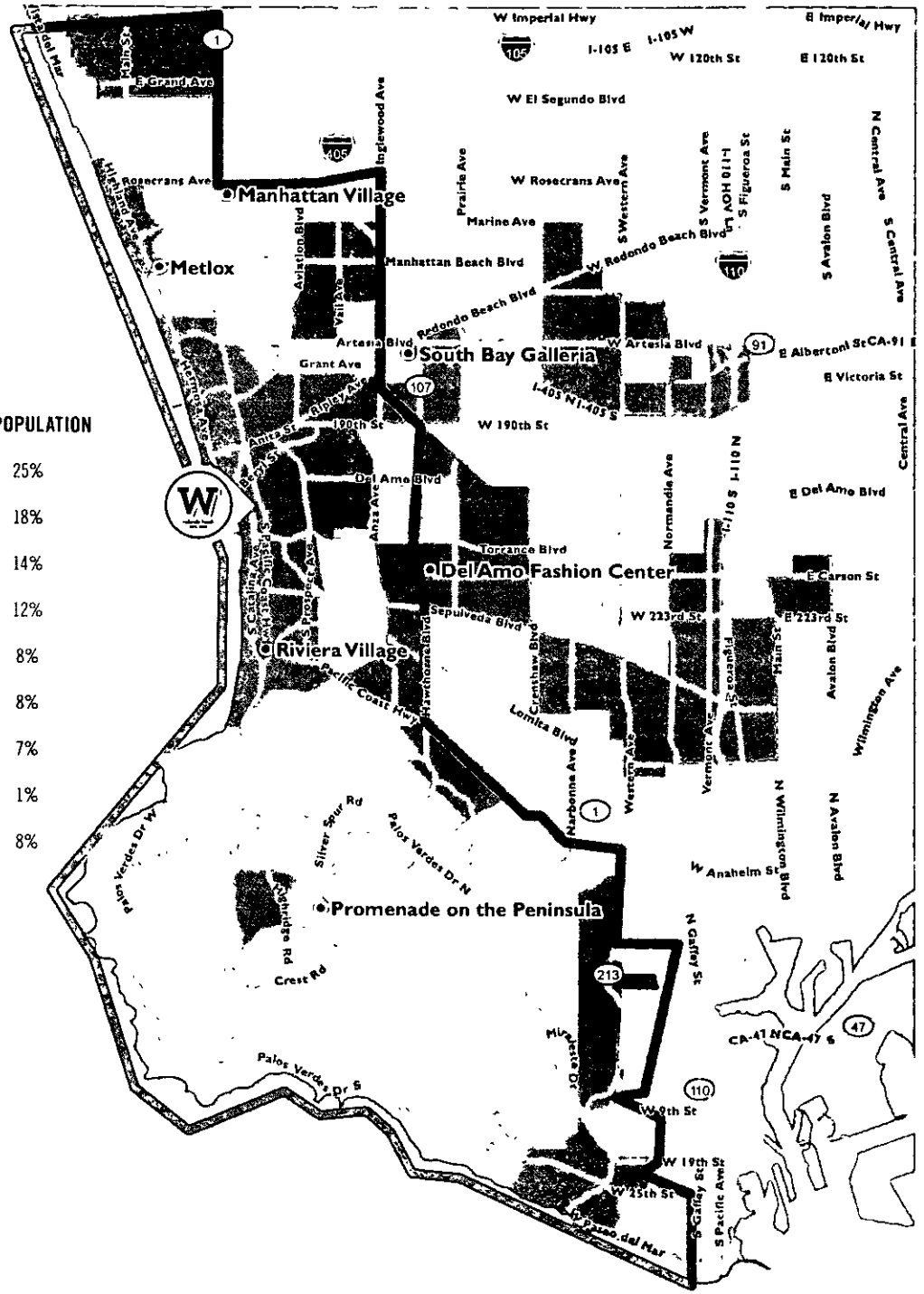
**TRADE AREA KEY**

Primary Trade Area Boundary

Secondary Trade Area Boundary

# THE FABRIC OF OUR TAPESTRY

| DESCRIPTION | POPULATION | MEDIAN AGE | HOUSEHOLDS | MEDIAN HH INC | % OF POPULATION |
|---|---|---|---|---|---|
| Urban Chic | 73,913 | 42 | 29,726 | $100,763 | 25% |
| Connoisseurs | 54,382 | 49 | 20,853 | $127,156 | 18% |
| Top Rung | 42,012 | 48 | 15,109 | $161,882 | 14% |
| Laptops & Lattes | 36,460 | 40 | 19,372 | $88,721 | 12% |
| Trendsetters | 25,417 | 37 | 10,822 | $71,273 | 8% |
| Pacific Heights | 22,717 | 42 | 8,582 | $72,692 | 8% |
| Wealthy Seaboard Suburbs | 19,898 | 46 | 7,061 | $102,000 | 7% |
| Silver & Gold | 2,213 | 57 | 1,026 | $76,585 | 1% |
| All Others | 23,541 | 41 | 9,608 | $72,876 | 8% |



# COMMUNITY PSYCHOGRAPHICS

Convenient and comfortable. The Waterfront offers a distinctive collection of unique and essential goods, services, and lifestyle amenities.

### URBAN CHIC (25%)
UPSCALE AVENUES
Prosperous, married-couple homeowners in different housing.

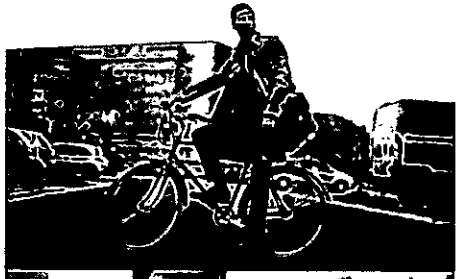


### TOP RUNG (14%)
HIGH SOCIETY
Affluent, well-educated, married-couple homeowners

### TREND SETTERS (8%)
SOLO ACTS
Urban young singles on the move.

### WEALTHY SEABOARD SUBURBS (7%)
HIGH SOCIETY
Affluent, well-educated, married-couple homeowners.

### CONNOISSEURS (8%)
HIGH SOCIETY
Affluent, well-educated, married-couple homeowners.



### LAPTOPS & LATTES (12%)
SOLO ACTS
Urban young singles on the move.

### PACIFIC HEIGHTS (8%)
UPSCALE AVENUES
Prosperous, married-couple homeowners in different housing.

### PACIFIC HEIGHTS (8%)
SENIOR STYLES
Senior lifestyles by income, age and housing type.

# A FRESH PERSPECTIVE

In 2004, Fred Bruning and Jean Paul Wardy announced the formation of CenterCal Properties, LLC.

A key factor in successfully creating value is to understand the product to be marketed. In the retail real estate industry, this means having the ability to thoroughly understand the requirements of the tenants and to effectively communicate the vision of the project to the tenants, government officials and lenders, all of whom share an integral role in the successful completion of any retail project.

Our company's mission is to find opportunities that will provide a secure return to its investors by creating solid and sustainable cash flow growth.

**"CREATING VALUE FOR RETAILERS AND COMMUNITIES"**

1600 EAST FRANKLIN AVENUE
EL SEGUNDO, CA 90245
310.563.6900
CENTERCAL.COM

**NOW LEASING**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**From:** Light, Jim
**Sent:** Monday, August 08, 2016 8:24 AM
**To:** 'eleanor.manzano@redondo.org'
**Cc:** 'Frank Angel'; Jim Light
**Subject:** Comments to Waterfront EIR

Eleanor,

Attached are minutes taken by Sheila Lamb on the Mole B boat ramp discussions at Bill Brand's Community Meeting on July 25th. I refer to these in my EIR comment submission. Please include in the public record on the Waterfront EIR proceedings.

VR,

**Jim Light**

Strategic Development

SAIC Inc.

*Office: 424.290.4069*

*Cell: 310.989.3332*

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Steve Colson -

1. Our kids use this area -
there will be more accidents -

2. Is this a forgone conclusion on Mole B

Bill - it isn't a done deal -

Gina De -

Took Jean Paul Wardy - our Migratory
Birds - can't take 200 ft up to a
migratory Bird nest

Henry Guzman -

A - 60-80 people per day & we're doing
it for 15-20 boats maybe

Leslie - Why not Mole D -
A - Breaks up connectivity in the harbor

Mike - Mole D is a the ref

Dennis Groat -

1. Where is the balance - ie. should be
done to accom Lani Kila
2. Using averages is not adequate
3. We need to be respectful b [illegible]
A - There could be days when we have

Sam Ederson

1. Whatever reason Mole B was not in
E/R -
2. Does this mean there will be a new
E/R - won't you need to do an amendment
to the E/R -
3. were not warring w/ each other -
4. all these issu

Gilbert 1. One lane - not sufficient
2. 2 lanes is

1. EIR - Using Mole C -
a. How quickly do we need to put in the ramp

Ian Bardine -
1. Orig plan had mole C
2. Cequa says you cant put a project in an less environmental place
3.
A - In juxtaposition

Josh Crayton -
1. It takes us as long to drive up from Irvine as it does to get into the Harbor -
2. Im seeing congestion and gridlock coming into the area - seeing a safety issue with congestion for emergency vehicles.

Ron Long - EMT -
1. Safety priority
2. Please state on record where your priority for safety is -
3.

We take direction from the city Council -

~~B~~ A - the environment impact is largely the same between Moles - under law our folks have done what is required -

Sara Burns - RB Sailing Club

1. we have 3 ~~[illegible]~~ small boats
2. we have no facility
3. A key demand will be a huge draw because getting into the open ocean. we also have the redondo upwelling
4. If we build it in Mole B we then could move it in 3 years. (Joe Crab Shack) It will not impact center calls

Dave Juran

1. Has there been any risk assessment with transient ~~[illegible]~~ boaters that are not experienced - we need a risk assessment v.s. Mole D where there is no risk for kids.

A -

Scott Davy -

1. Boater - staff for beaches / harbors / 40 year lift guard -
2. Highest & Best use - you can't put outrigger & boats ~~[illegible]~~ inland
3. Eliminating the slips - where are you going to move those people
4. Safety - Marina del Rey got shut down when they tried to move their ramp - your going to run into safety problems
5. Harbor patrol - will have difficult emergency access

Laura Zahn

1. Crab Shack - 15 years - are we capable of

2. If we can raise the 7 ml can we buy Jess.

Jeff Gilbert

1. Does State have min for 2 sport ramps

2. So we are not in alignment w/ the state.

A. No absolute but they have guidelines 20-30 park spaces per lane

3. Can we move outriggers to a better place?

a. It's a challenge to move to another place in harbor.

b. In 13 years Mole C may become available - we do

1. Concern - ~~30 boats~~ - Moonstone Park - what is a def. of a park? - Why can't this be a playground for kids, standings

A. If you contract a class w/ P&R - you could use Moonstone for your uses - It has a public use - if a private club provides a public program. 33%

Mark Hanson -

Comment 1. Mole B - Master Plan - says current users should be prioritized
2. Staging -
3. Blind wall - safety
4. Parking - poor -
5. We're going to similar to Marina del Rey -
6. Mole C - selected by C -
7. Problem will be now not in 13 years -
8. Lets buy out Joe Crab Shack and move to Mole C

Delia -

Comment - RB - we bought bldg we have a sail boat.
RE: Moonstone Park - 17 parking spaces -
Please explain who is
John LaRock - park inventory in RB
2.4 mil $ from Chevron - for Mole B -
But now there are conflicts re: this spot -
Parking will be v

Betty Lamato -

1. Conflicts w/ Lanakila -
a. Boaters will use parking
b. Lanakila - using parking
going to overflow
} same time

Wayne Craig -

Joe Crab Shack -
a. They don't think they're going to stay there
b. Will help w/ that -

6. Your destroying safety & best use for harbor connectivity.
7. Please address these issues before the EIR is approved

Q Harbor Com - public testimony will only be heard after commissions concerns addressed will they be valid?

John Comment - send comments can be sent to Katie Ostom

A - They won't make a decision.

Ross McKennon -
Doesn't a lease 'holder have property they could rent out

Eugen Solomon -
1. Measure G calls ~~for~~ to preserve & enhance harbor recreational uses - why are you sacrificing of
2. You are dissuaded

Gretchen Lloyd -
Way is Center Cal allowed to violate Measure G - if Center Cal adjusted to the harbor instead the other way around, Boating should be the priority -

A - There are alot of ways for the public to enjoy the w

Jas Crab Shack
1. They were not likely move from
~~these sites~~

Nils - Initiative -
1. Boater - dont use hoist here
2. Mole C - too expensive
3. Mole D - fully owned by the city -
(break in your walk)
4.
Answer -
Mole D - many concerns - there are
constraints - susceptibility to storm
surg - more challenges ~~the~~ operationally

Kim - Concerned mostly about the safety -
I'm worried about the kids -
I feel that we're being pushed out.
A -

Jim Light - Be
1. The community is behind you.
2. In 2007 - Mole D is the best solution
3. This is not a proper CQVA process
4. Everytime the comes up the recreational
Uses is put in 2nd place

Kurt Overmeier -
1. Drive in and out is a challenge
2. 1 lane not sufficient

Q This plan tries to balance competing
interests