Chapter 2
Response to Comments

2.1 Distribution of the Draft EIR

The City of Redondo Beach Draft EIR was distributed to the public and regulatory agencies on November 17, 2015, for a 63-day review period ending January 19, 2016 at 5:30 p.m. The public outreach approved by the Mayor and City Council on November 3, 2015 included the following:

- A Notice of Completion was received by the Office of Planning and Research/State Clearinghouse on November 17, 2015.
- The NOA/Notice of Public Meetings was filed with the Los Angeles County Clerk for a 30-day public posting on November 17, 2015.
- A display advertisement in the Easy Reader was published on November 5, 2015 and a second display advertisement on November 12, 2015 regarding the Draft EIR and public meetings.
- A press release/article was published in the Daily Breeze on November 9, 2015.
- Local Access Cable advertisement (i.e., Cable Crawl) began to run on November 10, 2015 and went until January 19, 2016.
- Email Blast of NOA to 517 email addresses on November 11, 2014. The email was sent to email addresses collected from sign-in sheets from eight community meetings held in 2013 to accept input on the proposed project, email addresses collected from sign-in sheets from the NOP Scoping Meeting/Open House held on July 9, 2014, and email addresses from comments received during and after the scoping process. Of the 517 emails, 63 were returned as undeliverable. Of the 63 undeliverable emails, eight email address were edited and the email was resent. Of the eight re-sent emails, four were returned as undeliverable.
- Bulk City-wide mailing (to 35,486 Redondo Beach residences) of NOA occurred between November 10-13, 2015.
- Approximately 2,700 NOAs were mailed on November 5, 2015 to owners within 300 feet of site as required by code.
- Approximately 399 NOAs were mailed on November 12, 2015 to specific local organizations, Harbor-Pier businesses and leasees.

- Approximately 43 public notices with the NOA were posted along the boundary and within the project site. Notices were posted approximately every 200 feet along the site perimeter set for November 12, 2015.

- Sent 30 NOAs and DVDs of the document overnight (for November 17, 2015 delivery) to various responsible agencies, and mailed 19 NOAs and DVDs of the document on November 12, 2015 to other agencies interested in the project.

- Filed the NOA with the Los Angeles County Clerk for posting

The City conducted three public meetings regarding the Draft EIR (November 21, 2015, December 9, 2015, and January 9, 2016) to provide an overview of the proposed project and alternatives and to accept public comments on the proposed project, alternatives, and environmental document. The public meeting locations, times and dates were on the NOA, notices, Cable Crawl, and newspaper advertisements, as follows:

- Saturday, November 21, 2015 from 9:00 AM - 1:00 PM* at the Crowne Plaza Hotel at 300 N. Harbor Drive, Redondo Beach,

- Wednesday December 9, 2015 from 6:00 PM - 9:00 PM* at the City's Main Library, 403 N. Pacific Coast Highway (second floor), and

- Saturday, January 9, 2016 from 9:00 AM - 1:00 PM* at the Crowne Plaza Hotel at 300 N. Harbor Drive, Redondo Beach.

*Per the notices, if hours were insufficient to collect comments from all meeting attendees, the time would have been extended.

The Draft EIR was available for review at the following locations:

- City of Redondo Beach, Community Development Department, 415 Diamond Street, Door 'E," Redondo Beach, California 90277
- City of Redondo Beach, City Clerk, 415 Diamond Street, Redondo Beach, California 90277
- Redondo Beach Public Library, 303 N. Pacific Coast Highway, Redondo Beach, California 90277
- Redondo Beach Public Library - North Branch, 2000 Artesia Boulevard, Redondo Beach, California 90277

An electronic version of the Draft EIR was also made available on the City's website for downloading and printing at www.redondo.org (follow link to Waterfront on Home Page). Additionally, DVDs containing the Draft EIR were available upon request at the City of Redondo Beach free of charge.

2.2 Comments on the Draft EIR

The public comment and response allows the respective lead agencies to assess the impacts of a project based on the analysis of other responsible, concerned, or adjacent

agencies and interested parties, and it provides an opportunity to amplify and better explain the analyses that the lead agencies have undertaken to determine the potential environmental impacts of a project. To that extent, responses to comments are intended to provide complete and thorough explanations on environmental issues to commenting agencies and individuals, and to improve the overall understanding of the project for the decision-making bodies.

Section 15204 of the State California Environmental Quality Act (CEQA) Guidelines provides guidance to the public in reviewing CEQA documents. This section of CEQA is designed not to limit the scope of comments that can be submitted by the public but to focus comments on issues that are substantive to the environmental analysis. Commenting entities should focus on the adequacy of the document in identifying and analyzing impacts to the environment and identify any areas they believe to be inadequate. The guidance indicates that comments should be submitted in a manner that:

- Identifies a specific environmental effect
- Supports the effect and its significance with substantial evidence

Comments should include alternatives or mitigation measures to avoid or reduce identified, specific environmental effects. This section reiterates that the lead agency is bound by “reasonableness” and “good faith” in its analysis and that the lead agency is not required to respond to comments in the Final EIR that do not identify significant environmental issues.

The format of this chapter is to provide written response to comments received on a letter by letter basis. An alphanumeric Identification (ID) Code is used to identify each correspondence submitted to the City of Redondo Beach on the Draft EIR. The ID Code consists a two-letter prefix followed by sequential three digit numbers. State agencies have an ID Code beginning with the letters AS, regional agencies have an ID Code beginning with the letters AR, local agencies have an ID Code beginning with the letters AL, individuals and organizations have an ID Code beginning with PC, and oral comments made at the public meetings have an ID Code beginning with PM with a number (1 to 3) corresponding to the public meeting attended. For example, three letters were received from state agencies. The three letters are assigned ID Codes AS001 through AS003. Each individual comment within a letter is then assigned a corresponding sequential number. For example, Letter AS001 includes four individual comments, which are designated as Comment AS001-1 through Comment AS001-4.

The City received 568 comment letters and emails and 115 oral comments at three public meetings on the Draft EIR during the public review period. A copy of each comment letter and email received is provided in Volume II of the Final EIR. Table 2-1 presents a list of those agencies, organizations, and individuals who commented on the Draft EIR, with the ID Code, and the page number where the comment(s) and response(s) can be found.

Table 2-1: Public Comments Received on the Draft EIR

ID Code	Date (date of issuance or receipt)	Individual/Organization	Page
State Government			
AS001	1/14/2016	California State Lands Commission	2-106
AS002	1/19/2016	Caltrans	2-111
AS003	1/22/2016*	State Clearinghouse	2-115
Agency comments received after the close of the review period (5:30 p.m. January 19, 2016)			
AS004	2/8/2016	California Department of Fish and Wildlife	2-124
Regional Government			
AR001	1/19/2016 (revised 6/8/2016)	Los Angeles County Sanitation District	2-129
Local Government			
AL001	1/18/2016	City of Hermosa Beach	2-137
AL002	12/9/2015	Torrance Transit	2-163
Public Comment/Individual			
PC001	11/17/2015	Ross Yosnow	2-164
PC002	11/18/2015	Margaret Otto	2-165
PC003	11/18/2015	Brian & Leanna Slagel	2-166
PC004	11/18/2015	Dan Elder	2-166
PC005	11/20/2015	Chris & Vanessa Farentinos	2-167
PC006	11/20/2015	David Smesler	2-167
PC007	11/21/2015	Shirley Cabeen	2-168
PC008	11/21/2015	Dan Buck	2-169
PC009	11/22/2015	Lauren Cotner	2-171
PC010	11/22/2015	Maureen Hickey	2-172
PC011	11/22/2015	Steve Goldstein	2-173
PC012	11/23/2015	Jim Veeck	2-173
PC013	11/25/2015	J. Charles	2-174
PC014	11/25/2015	Lisa McGinty	2-175
PC015	11/25/2015	Joanne Galin	2-175
PC016	11/21/2015	Steve Rasak	2-176

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PC017	11/21/2015	Barbara Epstein	2-177
PC018	11/21/2015	Matthew Udewitz	2-179
PC019	11/21/2015	Wendy Oikawa & Tom Mushaney	2-180
PC020	11/21/2015	Connie Abela	2-180
PC021	11/21/2015	Pete Lockwood	2-183
PC022	11/21/2015	Maggie Healy	2-183
PC023	11/21/2015	Anonymous	2-183
PC024	11/21/2015	Mickey Marraffine	2-184
PC025	11/21/2015	Resident	2-184
PC026	11/21/2015	Doug Christensen	2-184
PC027	11/21/2015	Sione Taufa	2-185
PC028	11/21/2015	Boyd Baker	2-185
PC029	11/21/2015	Mickey Turner	2-186
PC030	11/21/2015	Gerry O'Hagan	2-186
PC031	11/21/2015	Anonymous	2-186
PC032	11/21/2015	Robbie Meistrell	2-186
PC033	11/21/2015	Robbie Meistrell	2-187
PC034	11/21/2015	Penny Wirsing	2-187
PC035	11/21/2015	Joseph Chun	2-187
PC036	11/21/2015	Justin Miller	2-188
PC037	11/21/2015	Bruce Szeles	2-188
PC038	11/21/2015	Gennaro Pupa	2-189
PC039	11/21/2015	Susan Udewitz	2-190
PC040	11/21/2015	Chris Waces	2-194
PC041	11/21/2015	Reggie Thomas	2-194
PC042	11/21/2015	Joanne Galin	2-194
PC043	11/21/2015	Yvonne Vick	2-194
PC044	11/21/2015	Joan Irvine	2-195
PC045	11/21/2015	Chris Voisey	2-195
PC046	11/21/2015	Thomas Gray	2-195

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PC047	11/21/2015	Beth Metzger	2-195
PC048	11/21/2015	Jane Diehl	2-196
PC049	1/19/2015	Joyce Stepanek	2-196
PC050	11/21/2015	Gerry O'Hagan	2-196
PC051	1/15/2015	Jewel & Tom Musante	2-196
PC052	11/22/2015	Taylor Wolfson	2-197
PC053	11/22/2015	Kara Voisey	2-197
PC054	11/22/2015	Bonnie Nixon	2-197
PC055	11/22/2015	Jane Bakernik	2-197
PC056	11/22/2015	Gian Ishmo	2-198
PC057	11/22/2015	Juan Forteza	2-198
PC058	11/22/2015	Christine Winkler Ph.D	2-198
PC059	11/22/2015	Julie Coll	2-198
PC060	11/22/2015	Tera Guthrie	2-198
PC061	11/22/2015	Erik Bowman	2-199
PC062	11/22/2015	Deborah Shepard	2-199
PC063	11/22/2015	Angela Mailloux	2-199
PC064	11/22/2015	Lisa Sheffield	2-199
PC065	11/22/2015	Judith Opdahl	2-200
PC066	11/22/2015	Tim Hallissey	2-200
PC067	11/22/2015	Heidi Butzine	2-200
PC068	11/22/2015	Steve Goldstein	2-200
PC069	11/22/2015	Allen Vick	2-201
PC070	11/22/2015	Joanne Galin	2-201
PC071	11/22/2015	Greta Wortman	2-201
PC072	11/22/2015	Yvonne Vick	2-201
PC073	11/22/2015	Kathy Rogers	2-202
PC074	11/22/2015	Pat Dacy	2-202
PC075	12/4/2015	Gordon Stewart	2-202
PC076	12/5/2015	Joanna Snodgress	2-203

ID Code	Date (date of issuance or receipt)	Individual/Organization	Page
PC077	12/6/2015	Jim Desalvo	2-203
PC078	12/6/2015	Lorrie Kazan	2-204
PC079	12/9/2015	Dorris Cragg	2-205
PC080	12/9/2015	Jill Brown	2-205
PC081	12/9/2015	Barbara Epstein	2-207
PC082	12/9/2015	Barbara Epstein	2-212
PC083	12/9/2015	Jack Epstein	2-213
PC084	12/9/2015	Gretchen Lloyd	2-214
PC085	12/9/2015	Gina DiPietro	2-215
PC086	12/9/2015	Barbara Epstein	2-216
PC087	12/9/2015	Jack Epstein	2-218
PC088	12/9/2015	Barbara Epstein	2-219
PC089	12/9/2015	Steve	2-219
PC090	12/9/2015	Udewitz	2-220
PC091	12/9/2015	Bryce & Lisa	2-221
PC092	12/9/2015	Eric Ratley	2-221
PC093	12/9/2015	Mr. & Mrs. Martinez	2-221
PC094	12/9/2015	Jasper Bruinsma	2-222
PC095	12/9/2015	Darren & Pamela Matsuda	2-222
PC096	12/9/2015	Carolynn Ediger	2-223
PC097	12/9/2015	Sharon Andrade	2-223
PC098	12/9/2015	Kim Lee	2-223
PC099	12/9/2015	Vincent Goldberg	2-224
PC100	12/9/2015	Sara Ord	2-224
PC101	12/9/2015	Mike Pahl	2-224
PC102	12/9/2015	Andrew Pahl	2-225
PC103	12/9/2015	Barbara Stewart	2-225
PC104	12/9/2015	Anonymous	2-226
PC105	12/9/2015	Alexis Jensen	2-226
PC106	12/9/2015	Lee & Debbie Kornegay	2-226

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PC107	12/9/2015	Karen & Chet Morris	2-227
PC108	12/9/2015	Erik Burgers & Family	2-227
PC109	12/9/2015	Carlos Jimenez	2-227
PC110	12/9/2015	Jessie & Don Mattick	2-228
PC111	12/9/2015	JoAnn Turk	2-228
PC112	12/9/2015	Anonymous	2-228
PC113	12/9/2015	Evoy Retamal	2-229
PC114	1/19/2016	Cristina Heinricks	2-229
PC115	12/9/2015	Erika Snow Robinson	2-229
PC116	12/9/2015	Anonymous	2-230
PC117	12/9/2015	Terry Edwards	2-230
PC118	12/9/2015	Michelle Accetta	2-230
PC119	12/9/2015	Mary Lee Coe	2-231
PC120	12/9/2015	Joan Riley	2-232
PC121	12/9/2015	Gary & Rose Mhynek	2-235
PC122	12/9/2015	Reggie Thomas	2-235
PC123	12/9/2015	Stephen Comley	2-235
PC124	12/9/2015	Jennifer Goldstein	2-235
PC125	12/9/2015	John Gran	2-236
PC126	12/9/2015	Tera Guthrie	2-236
PC127	12/9/2015	Don Szerlip	2-236
PC128	12/9/2015	Darryl Vander Einde & Linda Buffington	2-236
PC129	12/9/2015	Roland Cesarini	2-237
PC130	12/9/2015	Mickey Cooper	2-237
PC131	12/9/2015	Mark Libiano	2-237
PC132	12/10/2015	Dave Waldner	2-237
PC133	12/11/2015	Jane Garrison	2-238
PC134	12/13/2015	Claudia Berman	2-238
PC135	12/13/2015	Chris & Gary Combs	2-246
PC136	12/22/2015	Janet Spessert	2-247

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PC137	1/15/2016	Brian & Janet Casey	2-250
PC138	12/22/2015	Margie	2-251
PC139	12/23/2015	Donna Gunnar	2-251
PC140	12/24/2015	Alan Rosemberg	2-252
PC141	12/25/2015	John Evans	2-252
PC142	12/26/2015	Sy Sheybani	2-253
PC143	12/28/2015	Becky Applegate	2-254
PC144	1/15/2016	Gretchen Lloyd	2-255
PC145	12/29/2015	Taheri Rangwala	2-256
PC146	1/16/2016	Jane Affonso	2-257
PC147	1/16/2016	Nancy Chenay Kennedy	2-259
PC148	12/30/2015	Joy Corradetti	2-259
PC149	1/3/2016	Eugene J Solomon	2-260
PC150	1/4/2016	Anneke Blair	2-262
PC151	1/4/2016	John Conyne	2-266
PC152	1/5/2016	Greg Diete	2-268
PC153	1/16/2016	Steve Collins	2-276
PC154	1/16/2016	Christopher Kreidel	2-277
PC155	1/16/2016	Donna Capraro	2-277
PC156	1/6/2016	Taylor Wolfson on behalf of Jack & Shanna Hall	2-277
PC157	1/14/2016	M. Dennis Dinneen	2-278
PC158	1/15/2016	Alice Murphy & Brandon Villalobos	2-278
PC159	1/7/2016	Southwest Anglers, Inc.	2-279
PC160	1/9/2016	Steve & Kathleen Davis	2-280
PC161	1/9/2016	Jessica Ibarra	2-282
PC162	1/9/2016	Azeta Fielstrg	2-282
PC163	1/9/2016	Denys Andrew	2-282
PC164	1/9/2016	David Brady	2-282
PC165	1/9/2016	Keith Arnold	2-283
PC166	1/9/2016	Gloria Abernathy	2-283

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PC167	1/9/2016	Lisa Youngworth	2-284
PC168	1/9/2016	Boyd Baker	2-284
PC169	1/9/2016	Jim Jenkins	2-285
PC170	1/9/2016	Anonymous	2-285
PC171	1/9/2016	Barbara Reilly	2-285
PC172	1/9/2016	Tom Jett	2-286
PC173	1/9/2016	Richard Reilly	2-286
PC174	1/9/2016	Nancy & Jeff Riedel	2-287
PC175	1/9/2016	Walter Aregger	2-287
PC176	1/9/2016	James Ecklund	2-288
PC177	1/9/2016	Anonymous	2-288
PC178	1/9/2016	Anonymous	2-289
PC179	1/9/2016	James Ecklund	2-290
PC180	1/9/2016	W. Aregger	2-290
PC181	1/9/2016	Anonymous	2-291
PC182	1/9/2016	Diane Liberman	2-291
PC183	1/9/2016	Harold Davidson	2-292
PC184	1/9/2016	Allen Vick	2-293
PC185	1/9/2016	Yvonne Vick	2-293
PC186	1/9/2016	Brian Hittelman	2-294
PC187	1/9/2016	Anonymous	2-295
PC188	1/9/2016	Greg & Lynn Vavrek	2-295
PC189	1/9/2016	Greg Diete	2-296
PC190	1/9/2016	Jeff Sallee	2-297
PC191	1/9/2016	Rene Scribe	2-297
PC192	1/9/2016	Virginia Gonzalez	2-298
PC193	1/9/2016	Dottie Lee	2-299
PC194	1/9/2016	Laura D. Zahn	2-302
PC195	1/9/2016	Boyd Baker	2-304
PC196	1/9/2016	Christopher S Brink	2-304

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PC198	1/16/2016	Mickey Turner	2-307
PC199	1/9/2016	Yvonne Vick	2-307
PC200	1/9/2016	Allen Vick	2-308
PC201	1/9/2016	Allen Vick	2-309
PC202	1/10/2016	Perry Cohen	2-310
PC203	1/10/2016	Gretchen Lloyd	2-310
PC204	1/11/2016	Julian Harvey	2-311
PC205	1/11/2016	Jill Johnson	2-312
PC206	1/11/2016	Greg Diete	2-313
PC207	1/11/2016	Christine & Dennis Joyce	2-315
PC208	1/11/2016	Allan Mason	2-315
PC209	1/12/2016	Gretchen Lloyd	2-316
PC210	1/12/2016	Kelly Charles	2-317
PC211	1/12/2016	Maria Castillo – Crowne Plaza Hotel	2-319
PC212	1/13/2016	Janet Johnson	2-320
PC213	1/13/2016	Joe Eyen	2-321
PC214	1/9/2016	Scott Fellows	2-321
PC215	1/9/2016	Mel See	2-321
PC216	1/9/2016	Alex See	2-322
PC217	1/9/2016	Christina Wennstrom	2-322
PC218	1/13/2013	Jim Desalvo	2-322
PC219	1/13/2013	Joanne Newman	2-323
PC220	1/13/2013	Gretchen Lloyd	2-323
PC221	1/13/2013	Jim Veeck	2-324
PC222	1/13/2013	Diana Davis	2-324
PC223	1/13/2013	Jason May	2-324
PC224	1/13/2013	Joyce Topping	2-325
PC225	1/13/2013	Christine Johnson	2-327
PC226	1/13/2013	David Warner	2-327

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PC228	1/13/2013	Keith Pippard	2-328
PC229	1/14/2016	Niclas Chavez	2-328
PC230	1/14/2016	Rebecca Baker	2-329
PC231	1/14/2016	Patti Linnett	2-329
PC232	1/14/2016	Rita Hora	2-330
PC233	1/14/2016	Deborah Shepard	2-330
PC234	1/14/2016	Lea Ann King	2-331
PC235	1/14/2016	John Whitaker – King Harbor Marlin Club	2-331
PC236	1/14/2016	Judith Farrell	2-332
PC237	1/14/2016	William Thon	2-332
PC238	1/14/2016	Celeste Coar	2-332
PC239	1/14/2016	Ernie O'Dell	2-332
PC240	1/14/2016	Cindy Compert	2-333
PC241	1/15/2016	David Siurek	2-333
PC242	1/15/2016	Robert C Cole	2-333
PC243	1/15/2016	Greg Diete	2-335
PC244	1/15/2016	Robin Ridenour	2-341
PC245	1/15/2016	Lisa Falk	2-341
PC246	1/15/2016	Shelia W Lamb	2-342
PC247	1/15/2016	Mikle & Sue Morgan	2-348
PC248	1/15/2016	Erika Snow Robinson	2-348
PC249	1/15/2016	Susan Coony	2-349
PC250	1/15/2016	April Pitcairn	2-349
PC251	1/16/2016	Elisabeth Diels	2-350
PC252	1/16/2016	Bob & Emma Williams	2-350
PC253	1/16/2016	Diana Mann	2-350
PC254	1/17/2016	Andy & Ann Chorbi	2-353
PC255	1/17/2016	Pattie Brown	2-354
PC256	1/17/2016	Joanne Newman	2-354

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PC259	1/17/2016	Jonathan Nook	2-356
PC260	1/17/2016	JoAnn Tredick	2-357
PC261	1/17/2016	Linda Morey	2-358
PC262	1/17/2016	Anita Caplan	2-358
PC263	1/17/2016	Megan Sullaway	2-359
PC264	1/18/2016	Connie Abela	2-363
PC265	1/18/2016	Joanne Newman	2-367
PC266	1/18/2016	Dawn Esser	2-367
PC267	1/18/2016	Michael & Judith Borrett	2-368
PC268	1/18/2016	Kathy Bullock	2-369
PC269	1/17/2016	Rena Tishman	2-369
PC270	1/18/2016	Joan Irvine	2-369
PC271	1/18/2016	Roger Light	2-370
PC272	1/18/2016	Jim Hannon	2-372
PC273	1/18/2016	Mary Medina	2-374
PC274	1/18/2016	Kathy Bullock	2-374
PC275	1/17/2016	Jim Saul	2-374
PC276	1/18/2016	Cheryl Tchir	2-374
PC277	1/18/2016	Roger Carlson	2-378
PC278	1/18/2016	Lillian Light	2-387
PC279	1/18/2016	Barbara Epstein	2-387
PC280	1/18/2016	Barbara Epstein	2-388
PC281	1/17/2016	Carol Sommers	2-389
PC282	1/18/2016	Steve Sadd	2-390
PC283	1/18/2016	Lisa Rodriguez	2-390
PC284	1/18/2016	Marty Falk	2-392
PC285	1/18/2016	Barbara Burke	2-394
PC286	1/17/2016	Lori Zaremski	2-394

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PC288	1/18/2016	David Brand	2-397
PC289	1/18/2016	Ruth & Mark Scruton	2-397
PC290	1/18/2016	Bob Mackie	2-397
PC291	1/17/2016	Robert King	2-398
PC292	1/18/2016	Marci O'Brien	2-398
PC293	1/18/2016	Lauren Cotner	2-398
PC294	1/18/2016	Kooguy	2-399
PC295	1/18/2016	Curt Rea	2-399
PC296	1/18/2016	Charlie Piccaro	2-399
PC297	1/18/2016	Mary Ewell	2-399
PC298	1/18/2016	Greg Hoffman	2-410
PC299	1/18/2016	Jaysen Surber	2-410
PC300	1/18/2016	Kevin Uhlin	2-411
PC301	1/18/2016	Carlos Fernandez	2-411
PC302	1/18/2016	Craig Haratani	2-411
PC303	1/18/2016	Marc R	2-412
PC304	1/18/2016	Linda R Neal	2-412
PC305	1/18/2016	Christopher Imbro	2-413
PC306	1/18/2016	Mauricio	2-413
PC307	1/18/2016	Carlos Medina	2-413
PC308	1/18/2016	John C Wileman	2-413
PC309	1/18/2016	Brad Ritter	2-414
PC310	1/18/2016	Joanne Galin	2-415
PC311	1/18/2016	Larry Wolf	2-415
PC312	1/18/2016	Adriene Biondo – Los Angeles Conservancy Modern Committee	2-415
PC313	1/18/2016	Bibi Goldstein	2-417
PC314	1/18/2016	Laura C Scarbrough – Nahoa Outrigger Canoe Club	2-418
PC315	1/18/2016	Anneke Blair	2-418

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PC317	1/18/2016	John Mann	2-420
PC318	1/18/2016	Cayla Dean	2-422
PC319	1/19/2016	Julian Harvey	2-423
PC320	1/19/2016	Jake Porter	2-423
PC321	1/19/2016	Julie Einwich	2-424
PC322	1/19/2016	Tim Charles	2-424
PC323	1/19/2016	James Light – Building a Better Redondo, Redondo Residents for Responsible Revitalization, Rescue Our Waterfront, and South Bay Parkland Conservancy	2-426
PC324	1/19/2016	Alan Hammer	2-565
PC325	1/19/2016	Matt Marble	2-567
PC326	1/19/2016	Charlie Trujillo	2-567
PC327	1/19/2016	Luis Vasquez-Ajmac	2-567
PC328	1/19/2016	Wayne Toddun	2-568
PC329	1/19/2016	Jessica Travis	2-568
PC330	1/19/2016	Melanie Cohen – South Bay Parkland Conservancy	2-568
PC331	1/19/2016	Ben Sloan	2-574
PC332	1/19/2016	Thomas A Gray	2-578
PC333	1/19/2016	Eva Cicoria – Sierra Club **P**alos Verdes South Bay Regional Group	2-579
PC334	1/19/2016	Alexandra Weyman – Unite Here! Local 11	2-606
PC335	1/19/2016	Walt Meadows	2-607
PC336	1/19/2016	Delia A Vechi	2-607
PC337	1/19/2016	Laura D Zahn	2-611
PC338	1/19/2016	Myrna Mendoza	2-616
PC339	1/19/2016	Kaye Gagnon	2-619
PC340	1/19/2016	Barbara Best & John Lubratich	2-620
PC341	1/19/2016	John Eng	2-622
PC342	1/19/2016	Jonathan Marquit	2-623

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PC343	1/19/2016	Moses Ramler – Lanakila Outrigger Canoe Club	2-624
PC344	1/19/2016	Gigi Frampton - FOSS	2-626
PC345	1/19/2016	Julie Coll – Waterfront Education dba King Harbor Boating Foundation	2-627
PC346	1/19/2016	Rebecca Elder	2-629
PC347	1/19/2016	Sally Hayati	2-629
PC348	1/19/2016	Marcia Pine	2-630
PC349	1/19/2016	Maryanne Guthrie – King Harbor Marina	2-630
PC350	1/19/2016	JoAnn Turk	2-632
PC351	1/19/2016	Erik N Bowman	2-633
PC352	1/19/2016	Antoinette Fowler Perpall	2-634
PC353	1/19/2016	Mark E Kinni	2-636
PC354	1/19/2016	Joanne Newman	2-636
PC355	1/19/2016	George Ikeda	2-637
PC356	1/19/2016	Suzanne McCune	2-646
PC357	1/19/2016	Kn	2-648
PC358	1/19/2016	Julius J Mondragon III	2-648
PC359	1/19/2016	Susan Petkus	2-649
PC360	1/19/2016	Heidi Butzine	2-649
PC361	1/19/2016	Miriam Dwinell	2-650
PC362	1/19/2016	Linda Akyuz	2-650
PC363	1/19/2016	Rob Peterson	2-653
PC364	1/19/2016	Hank Folson	2-654
PC365	1/19/2016	Tricia Petkus	2-656
PC366	1/19/2016	Jeff Sallee	2-656
PC367	1/19/2016	Heidi L van de Wouw	2-657
PC368	1/19/2016	Eric Hobday	2-659
PC369	1/19/2016	Jim Montgomery	2-660
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PC373	1/19/2016	Amy Josefek	2-665
PC374	1/19/2016	Michael & Kathryn Mescall	2-666
PC375	1/19/2016	John Alan Walti	2-666
PC376	1/19/2016	Mike & Sue Morgan	2-669
PC377	1/19/2016	Alison Canetty	2-672
PC378	1/19/2016	Alan	2-672
PC379	1/19/2016	Wayne Craig Homes	2-672
PC380	1/19/2016	Ray Hedge	2-674
PC381	1/19/2016	Diego Mendoza	2-675
PC382	1/19/2016	Sean McMinimy	2-676
PC383	1/19/2016	Joan Riley	2-676
PC384	1/19/2016	Carolyn Carter	2-680
PC385	1/19/2016	Judy Folsoi	2-681
PC386	1/19/2016	Yvonne Vick	2-681
PC387	1/19/2016	Yvonne Vick	2-681
PC388	1/19/2016	Doug Rodriguez	2-681
PC389	1/19/2016	Michael Kikkawa	2-683
PC390	1/19/2016	Kellie Brown	2-683
PC391	1/19/2016	Mary E Pagone	2-683
PC392	1/19/2016	Jyun Tosa	2-684
PC393	1/19/2016	Pat Smith	2-684
PC394	1/19/2016	Dan Elder	2-684
PC395	1/19/2016	Nik Meller	2-685
PC396	1/19/2016	Margaret Wynn	2-685
PC397	1/19/2016	Marie Stutz	2-686
PC398	1/19/2016	Gretchen Lloyd	2-687
PC399	1/19/2016	John Okanishi	2-688
PC400	1/19/2016	Leilani Goeppner	2-688
PC401	1/19/2016	Joan Riley	2-688

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PC402	1/19/2016	Doug Sahara	2-690
PC403	1/19/2016	Sam Elder	2-690
PC404	1/19/2016	April F Telles	2-692
PC405	1/19/2016	Jeff Pool	2-698
PC406	1/19/2016	Denise & Dennis Groat	2-701
PC407	1/19/2016	Marcie Guillermo	2-705
PC408	1/19/2016	Craig Funabashi	2-709
PC409	1/19/2016	Rick Becker	2-710
PC410	1/19/2016	Julie Moore	2-713
PC411	1/19/2016	Mick Hoglund	2-714
PC412	1/19/2016	Lisa Smocer	2-714
PC413	1/19/2016	Alfred Sattler	2-717
PC414	1/19/2016	Cox Castle Nicholson (on behalf of King Harbor Yacht Club)	2-718
PC415	1/19/2016	Jacqueline Warstadt	2-719
PC416	1/19/2016	Dean Francois – Friends of the South Bay Bicycle Paths	2-720
PC417	1/19/2016	Arnette Travis	2-727
PC418	1/19/2016	Lynn Gill	2-728
PC419	1/19/2016	Josephine Hrzina	2-728
PC420	1/19/2016	Karen & Nick Cull	2-730
PC421	1/19/2016	Donna Lopez	2-732
PC422	1/19/2016	Richard Davies	2-732
PC423	1/19/2016	Donna Duncan	2-734
PC424	1/6/2016	Travis Beckett	2-735
PC425	1/19/2016	Mark Hansen – King Harbor Boater's Advisory Panel	2-735
PC426	1/19/2016	Adele Gleichman	2-744
PC427	1/19/2016	Gerry O'Conner	2-745
PC428	1/19/2016	Beth Metzger	2-749
PC429	1/19/2016	Russell Burruss	2-750

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PC431	1/19/2016	Simmons Norwood	2-753
PC432	1/19/2016	Michael Stutz	2-753
PC433	1/19/2016	Jennifer Mars	2-755
PC434	1/19/2016	Barbara Pritzkat	2-755
PC435	1/19/2016	Albro Lundy	2-755
PC436	1/19/2016	Mary Watkins	2-756
PC437	1/19/2016	Norm & Maureen Reeder	2-757
PC438	1/19/2016	Loren Heard	2-757
PC439	1/19/2016	Tom Schleper	2-758
PC440	1/19/2016	Brett Henry – Redondo Beach Chamber of Commerce and Visitors Bureau	2-759
PC441	1/19/2016	Lennette Hartunian	2-760
PC442	1/19/2016	Elizabeth Zubieta Sanchez	2-761
PC443	1/19/2016	Dorothy (Dottie) Lee	2-761
PC444	1/19/2016	Urban Glue - Placemaker	2-761
PC445	1/19/2016	Richard Lopez	2-762
PC446	1/19/2016	Nicholas Palladino	2-762
PC447	1/19/2016	Dr. Will Pih	2-762
PC448	1/19/2016	Natalie Stork	2-763
PC449	1/19/2016	Kathleen Yinger	2-763
PC450	1/19/2016	Annie Lopez	2-763
PC451	1/19/2016	Blair Haiz	2-764
PC452	1/19/2016	Tom & Mary Malone	2-764
PC453	1/19/2016	Debbie & David Sawers	2-764
PC454	1/19/2016	Kevin Sullivan	2-765
PC455	1/19/2016	Joe Lavacher	2-765
PC456	1/19/2016	Kent Stones	2-765
PC457	1/19/2016	Todd & Claudia Langemeier	2-766
PC458	1/19/2016	Joan Schleper	2-766

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PC459	1/19/2016	Claudia Langemeier	2-767
PC460	1/19/2016	Tency Jaines	2-767
PC461	1/19/2016	Elliot Pleva	2-768
PC462	1/19/2016	Diana Pleva	2-768
PC463	1/19/2016	George Allen	2-768
PC464	1/19/2016	Kathie Austin	2-768
PC465	1/19/2016	Joe Austin	2-769
PC466	1/19/2016	Mark Boutilier	2-769
PC467	1/19/2016	Judy Shaffer	2-769
PC468	1/19/2016	Gerry Suzuki	2-770
PC469	1/19/2016	Ami Pearce	2-770
PC470	1/19/2016	Kevin Rupp	2-770
PC471	1/19/2016	Joan Maturko	2-770
PC472	1/19/2016	Steve Stepanek	2-771
PC473	1/19/2016	Linda Griffiths	2-771
PC474	1/19/2016	Mike Griffiths	2-771
PC475	1/19/2016	Bradford J. Keene	2-772
PC476	1/19/2016	Terresa Zimmerman	2-772
PC477	1/19/2016	Ada te Brinhe	2-772
PC478	1/19/2016	Gary Antonucci	2-773
PC479	1/19/2016	Antoinette Phillips	2-773
PC480	1/19/2016	Jennifer Lee	2-773
PC481	1/19/2016	Julie Sharp & David Melo	2-774
PC482	1/19/2016	Cindy Elias	2-774
PC483	1/19/2016	Marlene Dudek	2-774
PC484	1/19/2016	Carol Millinder	2-775
PC485	1/19/2016	David Kemp	2-775
PC486	1/19/2016	Christmas Colazzo III	2-775
PC487	1/19/2016	Marilyn Montenegro	2-776
PC488	1/19/2016	Susan Suttreiber	2-776

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PC489	1/19/2016	Capt. Michael Menarg	2-777
PC490	1/19/2016	Tony Murcia	2-777
PC491	1/19/2016	Barbara Reills	2-777
PC492	1/19/2016	Aaron Wilder	2-778
PC493	1/19/2016	CJ Johnson	2-778
PC494	1/19/2016	Ken Chew	2-778
PC495	1/19/2016	Pamela Kelterborn et al	2-779
PC496	1/19/2016	Nick Jokanovich	2-779
PC497	1/19/2016	Patrick McGeady	2-779
PC498	1/19/2016	Donald Pfaff	2-780
PC499	1/19/2016	Adrienne Slaughter	2-780
PC500	1/19/2016	Patty Woods	2-781
PC501	1/19/2016	Lois Piper	2-781
PC502	1/19/2016	Tom Piper	2-781
PC503	1/19/2016	Roland Blancaflor	2-781
PC504	1/19/2016	Eugene Strehler	2-782
PC505	1/19/2016	Kathryn Elrawstidge	2-782
PC506	1/19/2016	Al & Kathy Hilberg	2-782
PC507	1/19/2016	Maureen Baker	2-783
PC508	1/19/2016	Joe Chavez	2-783
PC509	1/19/2016	Taras Poznik	2-783
PC510	1/19/2016	Linda & Eddie Acosta	2-783
PC511	1/19/2016	Gerald Orcholski	2-784
PC512	1/19/2016	James Phillips	2-784
PC513	1/19/2016	Katherine Veze	2-785
PC514	1/19/2016	Steve Boucher	2-785
PC515	1/19/2016	Linda Reilly	2-785
PC516	1/19/2016	Diane Quick	2-786
PC517	1/19/2016	Terri Richardson	2-786
PC518	1/19/2016	Linda Richardson	2-786

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PC519	1/19/2016	Carole Baker	2-787
PC520	1/19/2016	Traci Reilly	2-787
PC521	1/19/2016	Brian Reilly	2-787
PC522	1/19/2016	Darrel Rigdon	2-788
PC523	1/19/2016	Denise & Dennis Groat	2-788
PC524	1/19/2016	Save the Pier Petition 1	2-791
PC525	1/19/2016	Save the Pier Petition 2	2-791
PC526	1/19/2016	Laura D Zahn	2-791
PC527	1/19/2016	Mary R Ewell	2-794
PC528	1/19/2016	Greg Diete	2-799
Public comments received after the close of the review period (5:30 p.m. January 19, 2016)**			
PC529	2/23/2016	Susan Schilling	2-800
PC530	1/19/2016	Len Buczek	2-801
PC531	1/19/2016	Mauro Ciarmoli	2-801
PC532	1/19/2016	David Scott	2-802
PC533	1/19/2016	Becky	2-802
PC534	1/19/2016	Ann Dalkey	2-803
PC535	1/19/2016	Jim Vaughan	2-812
PC536	1/19/2016	South Bay Chamber of Commerce	2-812
PC537	1/19/2016	Dawn Lambert	2-813
PC538	1/19/2016	Deeee58	2-814
PC539	1/20/2016	Jordan Latour	2-814
PC540	1/20/2016	Travis Phelps	2-814
PC541	1/20/2016	Mrs Fshnadx	2-815
PC542	1/20/2016	Jacob H Brand	2-815
PC543	1/20/2016	John & Cynthia Reeder	2-816
PC544	1/20/2016	Cheryl Munder	2-817
PC545	1/20/2016	Orpha Dess Wilson	2-818
PC546	1/20/2016	Cori Graham	2-818
PC547	1/20/2016	Stephany Debski	2-819

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PC548	1/20/2016	Pat Ross	2-819
PC549	1/20/2016	Matthew Gray	2-819
PC550	1/20/2016	Matt Parker	2-820
PC551	1/20/2016	Ann Cooper	2-820
PC552	1/19/2016	Susan & David Udewitz	2-820
PC553	1/20/2016	Caitlyn Huttinger	2-822
PC554	1/20/2016	Suzanne Carlson	2-823
PC555	1/21/2016	Luke Humphrey	2-823
PC556	1/23/2016	Jim Kanemaki	2-823
PC557	1/23/2016	Agnes M Morse	2-824
PC558	2/1/2016	Mark	2-824
PC559	2/6/2016	Debby McCurdy	2-825
PC560	2/8/2016	Gregory Gordon Howlind	2-826
PC561	2/17/2016	Wendy Cirelli	2-826
Draft EIR Public Meetings			
PM1: Draft EIR Public Meeting Transcript (November 21, 2015)			
PM1-01	11/21/2015	Bruce Szeles	2-930
PM1-02	11/21/2015	Ross Yosnow	2-930
PM1-03	11/21/2015	Adrainne Taufa	2-930
PM1-04	11/21/2015	Al West	2-930
PM1-05	11/21/2015	Beth Mineau	2-930
PM1-06	11/21/2015	Maryann Guthrie	2-931
PM1-07	11/21/2015	Penny Wirsing	2-931
PM1-08	11/21/2015	Barbara Epstein	2-931
PM1-09	11/21/2015	Matthew Udewitz	2-931
PM1-10	11/21/2015	Garry Ohst	2-931
PM1-11	11/21/2015	Gina DiPietro	2-932
PM1-12	11/21/2015	Tal Finney	2-932
PM1-13	11/21/2015	Jim Light	2-932

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PM1-14	11/21/2015	Steve Rasak	2-932
PM1-15	11/21/2015	Surjit Hora	2-932
PM1-16	11/21/2015	Pat Aust	2-933
PM1-17	11/21/2015	Reggie Thomas	2-933
PM1-18	11/21/2015	Joanne Galin	2-933
PM1-19	11/21/2015	Yvonne Vick	2-933
PM1-20	11/21/2015	Chris Voisey	2-934
PM1-21	11/21/2015	Joan Irvine	2-934
PM1-22	11/21/2015	Mickey Turner	2-934
PM1-23	11/21/2015	Janet Griswold	2-934
PM1-24	11/21/2015	Patrick Webb	2-934
PM1-25	11/21/2015	Dale Petrulis	2-935
PM1-26	11/21/2015	Rolf Strutzenberg	2-935
PM1-27	11/21/2015	Janet Johnson	2-935
PM1-28	11/21/2015	Joanne Newman	2-935
PM1-29	11/21/2015	Michael Del Tufo	2-936
PM1-30	11/21/2015	Alex Smith	2-936
PM1-31	11/21/2015	Tom Gray	2-936
PM1-32	11/21/2015	Christina Jesperson	2-936
PM1-33	11/21/2015	Matthew Udewitz	2-936
PM1-34	11/21/2015	JoAnn Turk	2-937
PM1-35	11/21/2015	Jane Diehl	2-937
PM2: Draft EIR Public Meeting Transcript (December 9, 2015)			
PM2-01	12/9/2015	Gina DiPietro	2-1035
PM2-02	12/9/2015	Robert Light	2-1035
PM2-03	12/9/2015	Robert Resnick	2-1035
PM2-04	12/9/2015	Tal Finney	2-1035
PM2-05	12/9/2015	Pam Combar	2-1036

ID Code	Date (date of issuance or receipt)	Individual/Organization	Page
PM2-06	12/9/2015	Dan Elder	2-1036
PM2-07	12/9/2015	JoAnn Turk	2-1036
PM2-08	12/9/2015	Joan Riley	2-1036
PM2-09	12/9/2015	Joanne Galin	2-1036
PM2-10	12/9/2015	Arnette Travis	2-1037
PM2-11	12/9/2015	Greg Diete	2-1037
PM2-12	12/9/2015	Andy Avrick	2-1037
PM2-13	12/9/2015	Joy Corradetti	2-1037
PM2-14	12/9/2015	Lori Zaremski	2-1037
PM2-15	12/9/2015	Eugene Solomon	2-1037
PM2-16	12/9/2015	Wayne Craig	2-1038
PM2-17	12/9/2015	Delia Vechi	2-1038
PM2-18	12/9/2015	Doug Christiansen	2-1038
PM2-19	12/9/2015	Bill Schwaneberg	2-1038
PM2-20	12/9/2015	Julie Coll	2-1038
PM2-21	12/9/2015	Jackie Balestra	2-1039
PM2-22	12/9/2015	Mark Knudson	2-1039
PM2-23	12/9/2015	Scott Fellows	2-1039
PM2-24	12/9/2015	Reggie Thomas	2-1039
PM2-25	12/9/2015	Steve Comley	2-1039
PM2-26	12/9/2015	Jennifer Goldstein	2-1040
PM2-27	12/9/2015	John Gran	2-1040
PM2-28	12/9/2015	Tera Guthrie	2-1040
PM2-29	12/9/2015	Don Szerlip	2-1040
PM2-30	12/9/2015	Laura Zahn	2-1041
PM2-31	12/9/2015	Lance Libiano	2-1041
PM2-32	12/9/2015	Mark Mendez	2-1041
PM2-33	12/9/2015	Elizabeth Sanchez	2-1041

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PM2-34	12/9/2015	Gerry O'Connor	2-1041
PM3: Draft EIR Public Meeting Transcript (January 9, 2016)			
PM3-01	1/9/2016	Wayne Craig	2-1161
PM3-02	1/9/2016	Alan Hurd	2-1161
PM3-03	1/9/2016	Lissa Dye	2-1161
PM3-04	1/9/2016	Brian Hittelman	2-1161
PM3-05	1/9/2016	Matthew Bernard	2-1162
PM3-06	1/9/2016	James Ecklund	2-1162
PM3-07	1/9/2016	Richard Wirsing	2-1162
PM3-08	1/9/2016	Penny Wirsing	2-1162
PM3-09	1/9/2016	Heidi Butzine	2-1163
PM3-10	1/9/2016	Brian Garcia	2-1163
PM3-11	1/9/2016	Adele Gleichman	2-1163
PM3-12	1/9/2016	Lisa Rodriguez	2-1163
PM3-13	1/9/2016	Arnette Travis	2-1164
PM3-14	1/9/2016	Greg Diete	2-1164
PM3-15	1/9/2016	Chris Voisey	2-1164
PM3-16	1/9/2016	Joanne Galin	2-1164
PM3-17	1/9/2016	Pat Aust	2-1164
PM3-18	1/9/2016	Scott Fellows	2-1164
PM3-19	1/9/2016	Alita Rethmeyer	2-1165
PM3-20	1/9/2016	Christopher Brink	2-1165
PM3-21	1/9/2016	Gene Noble	2-1165
PM3-22	1/9/2016	Reggie Thomas	2-1165
PM3-23	1/9/2016	Joyce Neu	2-1165
PM3-24	1/9/2016	Amy Josefek	2-1166
PM3-25	1/9/2016	Ron Troupe	2-1166
PM3-26	1/9/2016	Perry Cohen	2-1166

ID Code	Date (date of issuance or receipt)	Individual/Organization	Page
PM3-27	1/9/2016	Bob Amadon	2-1166
PM3-28	1/9/2016	Joan Irvine	2-1166
PM3-29	1/9/2016	Mary Ruth Ewell	2-1166
PM3-30	1/9/2016	David Coe	2-1167
PM3-31	1/9/2016	John Green	2-1167
PM3-32	1/9/2016	Tony Czuleger	2-1167
PM3-33	1/9/2016	Julian Harvey	2-1167
PM3-34	1/9/2016	Martin Holmes	2-1167
PM3-35	1/9/2016	Nils Nehrenheim	2-1168
PM3-36	1/9/2016	Joanne Turk	2-1168
PM3-37	1/9/2016	Joanne Newman	2-1168
PM3-38	1/9/2016	Surge Hora	2-1168
PM3-39	1/9/2016	Laura Zahn	2-1169
PM3-40	1/9/2016	Gregary Vavrek	2-1169
PM3-41	1/9/2016	René Scribe	2-1169
PM3-42	1/9/2016	Melanie Cohen	2-1169
PM3-43	1/9/2016	Gerry O'Connor	2-1169
PM3-44	1/9/2016	Jessica Ibarra	2-1170
PM3-45	1/9/2016	Eloy Retamal	2-1170
PM3-46	1/9/2016	Chris Morris	2-1170

* The State Clearinghouse functions as the “State Single Point of Contact” for coordinating the state-level review of environmental documents that are prepared pursuant to CEQA. As such, the comment letter from the State Clearinghouse, which includes a list of those state agencies that reviewed the Waterfront Draft EIR during the comment period, as well as includes comments received from state agencies that submitted comments, is dated and received after the comment period.
** Only comments received between January 19 after 5:30 p.m. to February 19, 2016 have been included in the Final EIR. Any comments received after February 19, 2016 (one month after the close of the public comment period) are not included in the Final EIR.

2.3 Responses to Comments

Consistent with CEQA Guidelines Section 15088 written responses have been prepared associated with environmental issues raised in the comments. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the proposed project is provided. In each case, the City has expended a good faith effort, supported by reasoned analysis, to respond to comments. As required by the State CEQA Guidelines, the focus of the responses to comments on the "disposition of significant environmental issues raised" and detailed responses are not provided on the merits of the proposed project or on other topics that do not related to environmental issues.

This section includes responses not only to the written comments received during the 63-day public review period of the Draft EIR, but also oral comments made at the three public meetings for the Draft EIR, as well as some comments received up until one month following the close of the public comment period (February 19, 2016). Some comments have prompted revisions to the text of the Draft EIR, which are referenced and shown in Chapter 3, Modifications to the Draft EIR.

Following is the text of each correspondence received presented by alphanumeric code as shown in Table 2-1. For each correspondence, the text of each individual comment is restated in its entirety, followed immediately by a response. Copies of the original correspondence, including any graphics and other attachments, with the individual comment numbered and bracketed are provided in Attachment A. For the oral comments, a copy of the transcript from each of the three public meetings is provided, and responses to each comment follow.

The responses to comments consist of both master responses and individual responses. When many comments were received that pertain to the same general theme, master responses were prepared to provide a comprehensive discussion of the issue of concern. A total of nine (9) master responses are provided. Master responses are provided below, followed by the comment letters and responses.

2.3.1 Master Responses to Key Topics

Because a large number of the comments received had similar concerns, a set of master responses was developed to address in a comprehensive manner common topics and concerns. The following are the master responses:

1. AES Power Plant Site
2. Cumulative Analysis
3. Economic Viability and Compatibility of Businesses at the Project Site
4. Modifications to the Seaside Lagoon
5. Sportfishing Pier, Polly's and Sportfishing
6. Summary of Traffic Impacts Associated with the Operation of the Proposed Project

7. Waterfront Parking

8. Boat Ramp in King Harbor

9. Views and Scale of Development

MASTER RESPONSE NO. #1: AES POWER PLANT SITE

Several comment letters suggested that (1) the proposed project should be planned in conjunction with an approximately 50 acre parcel of land located northeast of the project site which currently includes the AES Redondo Beach Generating Station and zoned Public –Generating Plant (P-GP) (hereafter referred to as the AES Site), and (2) the City consider the redevelopment of the AES Site as a cumulative project in the Waterfront EIR.

1. History of the City's Local Coastal Program

The Waterfront Project is proposed on land owned by the City of Redondo Beach (Harbor/Pier area). The land was granted to the City through a tidelands trust grant from the State of California in 1915 (amended by Senate Bill 1461 [1971]). However, the AES Site is privately owned and currently operated as an electricity generating facility. Consequently, while the City can create zoning which sets forth the basic development standards and includes a list of permissible uses, the City generally cannot force a private property owner to construct or operate a specific type of development. Furthermore, under certain circumstances, the California Energy Commission has the authority to approve new electricity generating facilities, which are inconsistent with the City's zoning regulations. (Pubic Resources Code [PRC] Section 25525.)

As described in Draft EIR Section 2.1.1.5 in Chapter 2, Project Description, the project site, along with the AES Site, and other surrounding areas have been the subject of numerous comprehensive planning initiatives over the past decades. This includes the Harbor/Civic Center Specific Plan first developed in 1992 and comprehensively updated in 2008, the Heart of the City plans which were adopted, and later rescinded by City Council in 2002 pursuant to a referendum. The current Local Coastal Program (LCP) is comprised of numerous resolutions and ordinances which were adopted by the City Council between 2005 and 2010 and approved by the voters of Redondo Beach in 2010 (Measure G). While Measure G set development standards for the Harbor/Pier, it also included amendments to the zoning for AES' property; adding parks and open space as permissible uses in the P-GP zone.[1]

[1] Adding parks and open space as permissible uses does not mean that these uses are reasonably foreseeable development on the AES Site for the purposes of this EIR's cumulative analysis; development of the AES Site will depend upon the intent of the property owner(s). The P-GP zone contains numerous categories of permissible uses, as outlined in Redondo Beach Municipal Code Section 10-5.1110 and 10-5.402(a)(140). (See *Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, 712 [The fact that other permitted uses were permissible on the project site did not make those uses reasonably foreseeable for the purposes of CEQA.]; see also *Ross v. California Coastal Commission* (2011) 199 Cal.App.4th 900, 944 [While the proposed LCP amendments applied to 733 parcels (including several parcels which could theoretically utilize the amendments), the Court rejected an argument that the environmental analysis need to include environmental review of these other lots.]

2. Recent Proposals for the AES Site Since the Electorate's Approval of Measure G

As detailed in Draft EIR Section 3.0.3.2.2, the AES Site has recently been the subject of numerous planning proposals, and development on the site is considered speculative. In 2012, a voter sponsored initiative (Measure A) proposed new zoning (1) allowing development ranging from 130,000 to 433,333 square feet (depending upon the category of land use) and (2) requiring that 60-70 percent of the site remain as open space. Measure A was rejected by electorate on March 5, 2013.

Also in 2012 (December), AES filed an application for construction of a "natural-gas fired, combined-cycle, air-cooled electrical generating facility with a net generating capacity of 496 megawatt, which will replace, and be constructed on the site of the AES Redondo Beach Generating Station."

In January 2013, the West Basin Municipal Water District's Ocean Water Desalination Program Master Plan identified and conceptually evaluated the AES Site as one of two candidate desalination plant sites. Subsequently, in 2014, the owner of the AES facility/site proposed an Initiative Measure (Measure B) to create new zoning, which would eventually allow redevelopment of the site with a mix of retail, visitor-serving, residential, commercial, and hotel uses. The Initiative Measure, referred to as "Harbor Village Plan," proposed up to 600 residential dwelling units of various types, up to 85,000 square feet of new commercial development, of which restaurant uses could not exceed 25,000 square feet, up to 250 hotel rooms and approximately 10 acres total be devoted to public open space. However, prior to any such construction, the project applicant was required to prepare a Master Development Plan, which would have been subject to the environmental review process under CEQA. Measure B also included a generating plant overlay zone, which would have allowed continuing use of the existing power plant until December 31, 2020, unless the plant was needed for a longer period of time to ensure electricity reliability.[2] Consequently, any such development under the Harbor Village Initiative would have likely been a decade away had the initiative measure been approved; and well beyond the horizon year for the proposed Waterfront Project. However, on March 3, 2015, the residents of the City voted against Measure B, thereby rejecting the Harbor Village Plan (5,614 NO votes and 5,213 YES votes).

Following the defeat of Measure B, on March 20, 2015 AES reinitiated its application to construct a new power plant. However, on November 25, 2015, the California Energy Commission suspended AES' application for a new power plant. AES also recently began looking for a buyer of the site for non-industrial uses; however, the site is still currently zoned P-GP (Generating Plant zone). Consequently, any non-industrial uses proposed by a subsequent property owner would require legislative amendments to the City's Local Coastal Program. Such legislative amendments would still likely require environmental review, as well as approvals from City Council, approvals from the California Coastal Commission,[3] and approvals from the Redondo Beach electorate (any City sponsored proposal would likely be subject to a public vote pursuant to Article XXVII of the City Charter). Consequently, development on the AES Site is currently speculative.

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[2] This date also generally coincides with the date power plants in California can no longer utilize natural ocean water for once through cooling. (State Water Resources Control Board Resolution No. 2010-0020.) http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/policy.shtml

[3] The Coastal Commission certification/approval process alone is likely to take at least a year, based upon the City's experience with similar recent LCP amendment submittals. (14 CCR Section 13551 et seq.)

3. Initiating a New Planning Process Which Includes the AES Site is Inconsistent with the Waterfront Project Objectives and CEQA

Any new comprehensive planning is likely to substantially delay construction of the project (approximately a decade) and would be inconsistent with the City's project objectives. Prior to City Council adopting new zoning for the AES Site, any such proposal would be subject to (1) the CEQA environmental review process, (2) the Planning/Zoning process (Government Code Section 65300 et seq), (3) the Coastal Act process, which would likely require at least an additional year or more if Coastal Commission recommends modifications (PRC Section 30000 et seq. 14 California Code of Regulations [CCR] Section 13551 et seq), and (4) the City's Initiative process under Article XXVII (which requires voter approval and preparation of additional environmental review which differs from the CEQA process). Even with new zoning in place, subsequent environmental review and planning will still likely be necessary when the property owner submits a development application.

The bulk of the City's current Harbor/Zoning regulations were first considered by Planning Commission in 2007. It has taken the City nearly a decade to go from this initial zoning proposal, to the preparation of the Waterfront Final EIR. Even then, the Waterfront Project is not expected to be operational until 2019. Any request to delay consideration of the Waterfront Project until development on the AES Site is proposed is likely to delay the project a decade or more (any specific development proposal on the AES Site may be subject to additional delays depending upon the level of interest/cooperation from the property owner). Consequently, an alternative which delays the Waterfront Project until subsequent planning has been prepared for the AES Site is inconsistent with CEQA Guidelines Sections 15126.6(a) and 15364 which require that an Alternative (1) meets "most of the project objectives" and (2) "capable of being accomplished in a successful manner within a reasonable period of time," and (3) capable of substantially reducing or avoiding the project's significant impacts. Such a lengthy delay would not meet most of the project objectives. For example, it would not provide for the repair and replacement of aging and obsolete infrastructure (such as the Pier Parking Structure, which at the release of the Draft EIR had an estimated five to 10 years remaining useful service life). It would also delay implementation of environmentally beneficial infrastructure improvements, such as the stormwater system improvements to reduce polluted runoff (Draft EIR page 2-75), improved bicycle and pedestrian access (Draft EIR page 2-71), and additional improvement to address wave uprush and sea level rise (Draft EIR page 2-45).

4. Cumulative Analysis and the AES Site

Several comment letters questioned the adequacy of cumulative impacts analysis, specifically suggesting that the Draft EIR needed to consider development of the AES Site. As described in Draft EIR Section 3.0.3, the CEQA Guidelines provides two different approaches to cumulative impact analyses, either (1) a list of projects approach, or (2) growth projections. (CEQA Guidelines Section 15130(b); see also *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 928-931 [EIR not required to use the list of project's approach to comply with CEQA, and can rely upon growth projections contained in the SCAG travel demand model].)

As noted in Draft EIR Section 3.0.3.2.1, the City conservatively[4] relied upon population growth projections from the Regional Transportation Plan from the Southern California Association of

[4] Use of the population growth projections was considered conservative for many resource areas, because, in many instances such as traffic, the Regional Transportation Plan projected a decrease in traffic of two percent by the year 2035, despite the increase in population.

Governments for most of its impact analyses, thereby relying upon CEQA's second cumulative analysis methodology. (See Master Response #2: Cumulative Analysis for additional details).

As also discussed above in section b, the future redevelopment of the AES Site is considered speculative and would occur over a significantly longer time period, and is unlikely to occur until well after the horizon year of the project's cumulative analysis (2019). The existing power plant can continue operating with once through ocean cooling until December 31, 2020 (SWRCB Resolution No. 2010-0020 [amended by Resolution No. 2013-0018] and Policy on Once Through Cooling). As noted above, any subsequent proposals for the AES Site would undergo separate environmental review and would be required to consider other cumulative development in the area (including any existing and planned development at the proposed project site).

MASTER RESPONSE NO. #2: CUMULATIVE ANALYSIS

Several comment letters questioned the adequacy of the cumulative impacts analysis (some comments were specific to the cumulative traffic analysis, while others were general statements), suggesting that the Draft EIR needed to consider certain specific projects that are being constructed or are planned for the future.

As described in Draft EIR Section 3.0.3, the CEQA Guidelines provides two potential methodologies for analyzing cumulative impacts, either (1) a list of projects approach, or (2) growth projections (which can be supplemented with additional information). (CEQA Guidelines Section 15130(b); see also *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 928-931 [EIR not required to use the list of project's approach to comply with CEQA, and can rely upon growth projections contained in the SCAG travel demand model].)

Consistent with CEQA Guidelines Section 15130(b)(1)(B), the Draft EIR followed the adopted growth projections approach for most resources areas, using a population growth rate of 0.36 percent per year, which was obtained from the Southern California Association of Governments (SCAG) Integrated Growth Forecast for the City of Redondo Beach.[5,6] As discussed in the SCAG Growth Forecast "the regional growth forecast represents the most likely growth scenario for the Southern California region in the future, taking into account a combination of recent and past trends, reasonable key technical assumptions, and local or regional growth policies." The SCAG growth projections were developed utilizing comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans and population, housing and employment forecasts for the City, neighboring communities, and the county. Therefore, future growth within the City and neighboring cities was considered in the cumulative impacts analysis consistent with CEQA requirements. While most resources areas utilized the SCAG growth projections, some resources areas were less dependent upon population growth and therefore utilized a slightly different cumulative methodology; please see each resource chapter for additional details.[7]

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[5] SCAG. 2012. 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. April. Available online at: http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx)

[6] SCAG. 2012b. 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy Growth Forecasts Appendix. Available online at: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf.

[7] For example, the Air Quality analysis contained in Chapter 3.2 utilizes information from South Coast Air Quality Management District and the associated 2012 Air Quality Management Plan (AQMP).

For the traffic analysis in the Draft EIR, the SCAG travel demand model[8] was run and compared to the model-assigned traffic assigned on roadways in the City (City-wide) between the base year (2008) and the forecast year (2035). The net change in volumes was a decline of two percent due to the transportation infrastructure improvements, land use changes, and policy strategies associated with SCAG's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS). Therefore, the use of the population growth rate is considered a very conservative "worst-case" analysis. Additionally, as discussed in Section 3.13, Traffic and Transportation of the Draft EIR, while the City is relying primarily upon the growth projections approach, the City also conservatively incorporated the trip generation from several specific development projects located in close proximity to the primary routes of trip distribution for the project site. These specific projects are known development projects with the greatest likelihood to add trips to the intersections located closest to the project site. Traffic estimated to be generated by four development projects in the study area (i.e., Shade Hotel Redondo Beach, Legado Redondo,[9] Kensington Assisted Living Facility, and the Seabreeze project [also referenced as the Prospect Avenue Project]) were also incorporated into the traffic volumes to characterize Cumulative (2019) Conditions without Project. (See Draft EIR page 3.13-44 and Appendix L1, Section 3.)

Several comments were received specifically regarding the need to include redevelopment of the AES Power Plant Site in the cumulative impacts analysis. As discussed in greater Master Response #1: AES Power Plant Site, development on the AES Site is considered speculative at this time.

MASTER RESPONSE NO. #3: ECONOMIC VITALITY AND COMPATIBILITY OF BUSINESSES AT THE PROJECT SITE

Several comment letters expressed concern that if the project were to be built, that: 1) the new development might not be financially feasible and the site would once again become run down; 2) the businesses at the project site would be 'upscale' and the residents and businesses would be priced-out of the location; and 3) a movie theater is not needed at the site and is not an economically sustainable or appropriate use.

Following is a detailed response associated with these three concerns:

1. ***Concern that the new development might not be financially feasible and the site would once again become run down (i.e., urban decay or blight).***

As described in Section 2.1.1.5.11 in Chapter 2, Project Description (page 2-13) of the Draft EIR, in February 2015, a market study was prepared for the City that evaluated the proposed waterfront revitalization at the project site (AECOM, 2015 – included as Appendix O of the Draft EIR). The market study analyzed proposed program elements such as food and beverage offerings, a market hall, a specialty

[8] As discussed on Draft EIR, Appendix L1, page 12, the SCAG model utilized in the analysis (Draft EIR page 3.13-43), has been calibrated and validated to accurately reflect traffic conditions. SCAG Regional Travel Demand Model and 2012 Validation Report, noting "The Regional Transportation Model sufficiently replicates the observed validation data as described herein. As such, the model is validated for use in preparing travel forecasts for the SCAG 2012-2035 RTP/SCS." http://www.scag.ca.gov/Documents/SCAG_RTDM_2012ModelValidation.pdf

[9] Subsequent to the release of the Waterfront Draft EIR and the associated cumulative analysis, the Applicant for the Legado project modified its project by decreasing the number of proposed residential units (decrease of approximately 30 residential units) and reducing the square footage of the commercial development proposed (by approximately 14,000 sq. ft); these modifications result in a trip reduced from the 2,677 daily trips (assumed in the Waterfront Cumulative analysis), down to 797 daily trips. After this applicant proposed modifications, the City Council further reduced the residential component of the Legado project by an additional 31 units.

movie theater, a boutique hotel, and creative office space. The report analyzed the market area for the proposed project based on the expected expenditure decisions of residents, workers, and visitors. The market area was further broken down based on various retail subareas including retail, hotel, and office areas. The proposed project was categorized as a mixed-use development with a strong retail, dining, entertainment (RDE) component with uses that are intended to complement each other, creating a multi-faceted leisure experience, thereby increasing the project's overall attractiveness to visitors. In addition, the study determined that regional and local employment growth would provide a source of demand for the retail, office, and hotel components of the proposed project.

The AECOM study indicated that unlike regional shopping centers that rely on department store anchors, RDE developments rely on a mix of activities and expertise to drive business to the area. As discussed in greater detail in Section 3 of this Master Response, the proposed specialty theater would offer a distinctive option for this area and could potentially generate sales volumes significantly higher than estimated in the study and differs from traditional movie theaters. Based on the market study, the anticipated capture of entertaining spending and market demographics for the proposed project, the proposed theater concept appears marketable. The proposed project offers other unique development components including a boutique hotel and creative office space that would provide companies and travelers a different option than those currently in the surrounding project area. As also discussed in Chapter 2, one of the project objectives is to reduce seasonality, by including facilities such as a movie theater and hotels. As also discussed in the City Council's April 8, 2008 Administrative Report for the project site's zoning, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors… expanded hotel and hospitality uses and offices are an important component of revitalization of the Harbor and Pier area." Based on this AECOM study, there is an opportunity for the proposed project to fill a potential gap in the market for retail, dining, and entertainment offerings in the South Bay.

The Draft EIR analyzed in detail in Chapter 5, Other CEQA Considerations, the potential for the project to cause urban decay or blight (which is defined in the Draft EIR as physical deterioration of properties or structures that is so prevalent, substantial, and lasting a significant period of time that it impairs the proper utilization of the properties and structures, and the health, safety, and welfare of the surrounding community) at the project site and neighboring areas. In Section 5.6 (starting on page 5-16) of Chapter 5, the AECOM study was further discussed to detail the market area, market base (residential, employee and tourist), demand for a RDE development (including the specialty cinema) within the South Bay and project site area, as well as the boutique hotel and creative office land uses. The AECOM study substantiates the conclusion that the market provides sufficient demand to support the proposed project. In addition, as described in Sections 5.6.2 and 5.6.3 in Chapter 5 of the Draft EIR, because there is sufficient existing and future market demand for the proposed RDE, hotel, and office developments and the proposed project would replace existing structures at the waterfront site, several which are suffering from deterioration, the new development under the proposed project would rehabilitate or replace structures to stop further deterioration and urban decay at the project site. Therefore, the proposed project would be a benefit to the area by reducing the potential for urban decay of existing facilities and would be unlikely for businesses to close due to economic failure. Further, the market study indicated that the proposed project would fill a gap in the market by providing a RDE development within the South Bay (AECOM, 2015), and therefore the proposed project is not expected to be in direct competition with surrounding retail centers and other waterfront development and would not attract sufficient market away from other developments such that urban decay would occur. As a result, implementation of the proposed project is not expected to result in an urban decay impact at the proposed project site or neighboring areas.

2. The businesses at the project site would be 'upscale' and the residents and businesses would be priced-out of the location.

It is beyond the scope of CEQA to address social or economic impacts, which do not contribute to, or are not caused by, physical impacts on the environment (CEQA Guidelines Section 15384). As described above and addressed in Section 5.6 (starting on page 5-16) of Chapter 5 of the Draft EIR, a market study for the proposed project indicated that market provides sufficient demand to support the proposed project and thus, based on the proposed mix of development, implementation of the proposed project is not expected to result in an urban decay impact at the proposed project site or neighboring areas. Therefore, no significant physical impacts relative to the mix of businesses located at the project site would occur.

Regardless, it should be noted that the tenants at the project site have not yet been determined, but are anticipated to include a selection that serves a wide segment of visitors to the site. Some of the current tenants would be given the opportunity remain at the project site in addition to new businesses that would be established. However, it is too early in the process for the City or the developer to enter into lease agreements with potential subtenants. Furthermore, it is not necessary to identify future tenants in order to adequately analyze the environmental impacts of the proposed project under CEQA. An EIR is only required to set forth the significant effects on the environment, which are defined as "the physical conditions which exist within the area which will be affected by a proposed project." (Public Resource Code Sections 21100(b)(1); 21060.5). See also *Maintain Our Desert Environment v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, where the court rejected the notion that the identity of the end user is a required element of an accurate project description. The court emphasized that CEQA is concerned with environmental consequences.

In addition to commercial uses, the proposed project would provide a variety of free or low-cost activities. Free or low-cost activities and amenities include enhanced walking and biking paths, accessibility to the water's edge for activities such as viewing the ocean, picnicking, photography, water recreation (the cost would vary depending on type of equipment purchased or rented), and pier fishing (available at the Monstad Pier and a portion of Horseshoe Pier, as well as the Sportfishing Pier if it is replaced). Additionally, the Seaside Lagoon would go from a fee-based and limited use area (it is currently open for a couple months in the summer) to a free use and open all year round facility.

3. A movie theater is not needed at the site and is not a sustainable or appropriate waterfront use.

An important objective of the proposed project (refer to Section 2.2 in Chapter 2, Project Description of the Draft EIR for a list of the project objectives) is to optimize the full potential of approximately 36 acres of the Redondo Beach Waterfront (project site) 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. As discussed in the City Council's April 8, 2008 Administrative Report for the zoning amendments, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors." As part of the proposed high-quality mixed uses being proposed to reduce seasonality (i.e., encourage visitors to the site during all seasons of the year) is the specialty cinema. A specialty cinema being proposed responds to changes in movie watching habits, by providing a fewer screens and a higher quality viewing environment, as well as giving movie-goers the opportunity to order full-service dining and drinks at the outdoor terrace or at their seat while watching a movie. This is a not a mass-market product but a unique type of viewing experience different from that of other South Bay theaters. It is intended to serve an older movie- going demographic as compared to the typical theater core customers (16 to 23 year olds). An example of a specialty cinema

is Cinepolis[10] and iPic.[11] Both of these companies have opened movie theaters in California in the last seven years. iPic opened its theaters in Pasadena in December 2009 and in Westwood in 2014. Cinepolis opened its theaters in Del Mar in August 2011, in La Costa in January 2012, in Laguna Niguel in June 2012, in Westlake Village in September 2012, in Rancho Santa Margarita in December 2012, in Pico Rivera in February 2015, and in the City of Vista in February 2015. The AECOM study determined that given the anticipated capture of entertainment spending and market demographics, the specialty cinema is a viable component of the proposed project.

Several comments have been received stating that a movie theater is not an appropriate use at the waterfront. However, the proposed use is consistent with uses allowed under the City's General Plan, Coastal Land Use Plan, Coastal Zoning, and Harbor/Civic Center Specific Plan, which, as discussed in Section 3.9 of the Draft EIR, include allowable uses such as commercial/private recreation and entertainment uses. More specifically, the Redondo Beach Municipal Code (RBMC) Section 10-5.810 expressly allows for "Commercial Recreation" uses, which includes theaters and cinemas. (RBMC Section 10-5.402(a)(50).) These regulations were approved by the City of Redondo Beach, the Redondo Beach electorate (Measure G), and the Coastal Commission. Additionally, it should be noted that historically a movie theater has been on the project site as early as 1912, with the Fox Theater being located at the site from 1929 to 1973.

MASTER RESPONSE NO. #4: MODIFICATIONS TO THE SEASIDE LAGOON

Several comment letters address the proposed modifications of Seaside Lagoon, including the 1) size and usability of the facility; 2) safety associated with proximity to the proposed boat ramp and use of the facility by standup paddle boarders (SUPs) and swimmers, 3) water quality for swimming, and 4) concerns associated with inhabitation by sea lions.

Following is a detailed response associated with the concerns:

1. Size and Usability of Seaside Lagoon:

Under the proposed project, the area zoned for public park uses would not change in size. However, areas of former grass and an access gate/drive would be repurposed for concession building use, parking and an access roadway. There would be no actual reduction in amount of land zoned for public recreational uses. The amount of water area would vary with the tide (i.e., when water levels are lower, more sand beach would be exposed).

As shown on Figure 3.12-5 in Section 3.12, Recreation of the Draft EIR, the amount of water area within the Seaside Lagoon boundary could be less as compared to existing conditions during the summer months (when Seaside Lagoon is currently open to the public), because the amount of water in the lagoon would vary with the tides. However, while it is expected that the beach would largely be a wading beach, with the opening of the breakwall, the area available for swimming would expand to include the entire area protected by the existing breakwater south of the lagoon. Additionally, a direct water link to the open harbor would be available, further expanding the recreation opportunities available at Seaside Lagoon, increasing water access, and creating an improved physical and visual connection with the harbor.

[10] http://www.cinepolisusa.com/
[11] https://www.ipictheaters.com

The Seaside Lagoon park area is currently enclosed by a chain link fence and the public must pay a fee to access the site, which is only open during the summer months and for special events during the remainder of the year. Under the proposed project, the park would be open to the public free year round, which would increase the accessibility of the site by making it available to everyone at any time of the year (although temporary limited access of all or a portion of the park and the charging of admission fees may still occur periodically for special events, as occurs under existing conditions, subject to the City's Amusement and Entertainment Permit regulations or the City's Temporary Use Permit procedures, under RBMC Sections 4-17.01 and 10-5.2520).

As described in Section 3.9, Land Use and Planning of the Draft EIR, the other proposed uses within the area zoned for public park, including rights-of-way, parking and accessory uses, are consistent with uses allowed under the City's recreational P-PRO zoning (parks, recreation, and open space zone. The accessory uses would include marine recreation products and rentals (e.g., kayaks, paddle boards, wetsuits), beach club, maintenance, public safety, and concessions. These recreation-related concessions/accessory uses would cater to/support the waterside recreational uses and would be maintained and managed through an operating agreement. While several comments have expressed concern that buildings in the P-PRO zone are not appropriate for recreational facilities, they were expressly contemplated in the City's certified zoning, which allows for a floor area ratio (FAR) of 0.25. Under the proposed project, the FAR would be 0.094, which is below the maximum allowed under the zoning. This value is even further reduced under the Staff Recommended Alternative (which eliminates a building from the P-PRO zone).

The access road and parking stalls located within the park area would provide park access, including a designated drop-off area for loading and unloading of other recreational equipment/supplies at the park (i.e., dropping off coolers, paddleboards, passengers, etc.), and handicapped access. Therefore, the other features located within the park boundary are consistent with and would support the recreational use of Seaside Lagoon. This is similar to other parks in the City, which have on-site parking, access roads, concessions, and other facilities such as community rooms.

For long-term parking, parking in the parking structure in the northern portion of the project or other parking in the area (i.e., Plaza Parking Structure, surface/street parking, and parking structure in the southern portion of the project site) would be available. Pathways throughout the project site would provide access to the lagoon. Bicycle racks would also be available in the vicinity, allowing bicyclists to easily and safely park their bikes and visit the lagoon. In addition, storage would be provided for paddle boards.

While the site would change from that of a swimming pool-type setting to a more natural beach experience and some specific recreational opportunities at the site would change (i.e., water slides and fountains would be removed but new boardwalk, seating, landscaping, and accessory uses would be established), the site would continue to be a recreational resource for the community. Seaside Lagoon would be a focal point for events and activities occurring at the Waterfront and would be used extensively as both an informal public gathering space and as a site for organized events and activities. In addition to public events and activities, there would also continue to be opportunities for occasional private events. Seaside Lagoon events and activities could make use of modified features such as concrete steps down to the beach providing amphitheater style seating, open beach and lawn area, enclosed pavilion, wide boardwalk and plazas seaward of the accessory buildings, direct physical connection to harbor waters, and a view that is open to the harbor. Public and private events may include uses similar to those that occur under existing conditions:

- Lobster Festival

- Fourth of July Fireworks
- Concert series (professional musicians and local schools and community groups)
- Easter egg hunts
- Movies on the beach
- Private events such as class reunions, corporate parties
- Community fundraisers such as wine tasting, chili cook off
- Teen beach parties/after prom events

The modified Seaside Lagoon as well as other open spaces on site would serve as the site of organized recreational and cultural activities and public exhibits. Activities and exhibits that would be held may include the following, and subject to Entertainment or Temporary Event permits depending upon the nature of the activity:

- SUP/kayak instruction
- Yoga/Tai Chi
- Staging for 5k runs
- Exercise classes
- Swimming lessons such as ocean safety classes
- Cultural dance events
- Art shows/exhibits
- Educational exhibits/programs such as tide pools, marine studies

Furthermore, the proposed project provides a number of benefits to the lagoons operations, including but not limited to: 1) the proposed project would allow the lagoon to be open year round and all day (rather than only during the summer months for specified hours under existing conditions); 2) the proposed project would eliminate the physical fencing and barriers that separate the lagoon from the rest of the Harbor; 3) the lagoon would no longer require a fee to access the facility (as occurs under existing conditions); 4) individuals will be able to access the lagoon to launch paddle board and kayaks (which is not available under existing conditions), 5) the proposed project would provide improved pedestrian and bicycle access to the lagoon; and 6) the proposed project would provide improved concession and accessory uses (such as recreational sales/ rentals). Therefore, as discussed in Section 3.12, Recreation of the Draft EIR under Impact REC-1, the modifications to Seaside Lagoon would not result in decreased recreational opportunities and would not cause increased use of other recreational facilities such that substantial physical deterioration would occur. Impacts would be less than significant.

2. Safety

Impact TRA-3, starting on page 3.13-80, in Section 3.13, Traffic and Transportation of the Draft EIR, analyzes the potential for the proposed project to increase hazards due to design or incompatible uses. Specifically, the operation of the proposed small craft boat launch facility at Mole C and its proximity to the Seaside Lagoon and Basin 3 was analyzed. The analysis found that even during times of peak demand at the boat launch the maximum rate would be four launches per hour per lane, which is approximately two boats entering the harbor every 15 minutes. This was not found to be a significant increase in boat traffic and would not disrupt existing harbor traffic or impact water use. Boats returning to the launch ramp for retrieval may arrive at more frequent intervals in the afternoon. Based on a very conservative (i.e., worst-case) assumption that one-half of the 40 boats (i.e., the maximum capacity of the boat launch ramp parking lot) return within a 2.5 hour mid- to late-afternoon time window, the boat retrieval activity during such a high peak demand period could be accommodated with a retrieval rate of eight boats per hour and the remaining 12 boats may queue nearby at any one time. Sufficient space within the turning basin or the north end of the outer harbor near the mooring area is available for temporary mooring until boarding float space becomes available. On non-peak days, boat launches are estimated to be much lower.

As determined in the Draft EIR, construction of the protective breakwater at the proposed small craft boat launch site could result in an increase in the potential for conflict with personal recreational watercraft (e.g., paddle boards, kayaks, peddle boats and other hand launch craft) emanating from Seaside Lagoon. The magnitude of such potential conflicts would, however, be offset because of the slow speeds that the motor boats would operate at during departure from or return to the ramp area. This would allow time for sufficient maneuvering as necessary to avoid errant personal recreational watercraft if encountered. Nevertheless, the proximity of the small craft boat launch ramp and hand launches from Seaside Lagoon combined with the fact that the interface area between the activities would be somewhat confined by the presence of the breakwater, which may also limit sight lines, could pose a potential safety hazard, particularly during times of peak use, which for the purposes of this EIR is considered to be a significant impact. As indicated starting on page 3.13-82 in Section 3.13 of the Draft EIR, with anticipated slow speeds in the entrance area of the proposed small craft boat launch facility and the open Seaside Lagoon, and implementation of mitigation measure MM TRA-8: Boat Launch Ramp/Personal Recreational Watercraft Interface Management, safety would be enhanced in that area and would reduce the potential for interface conflicts between boats and personal recreational watercraft operating in proximity to each other. This mitigation measure for the proposed project provides for buoys and signage segregating waterside boat lanes and personal recreational watercraft and includes provisions for safety instruction for personal recreational watercraft users. As such, the impact after mitigation is considered less than significant.

Seaside Lagoon is currently a popular area to bring young children for swimming in a safe setting. As described in Section 3.12, Recreation of the Draft EIR, modifications to Seaside Lagoon would continue to provide swimming opportunities out of ocean waves and currents. The breakwall would be designed to protect the opening of the lagoon to reduce wave action and thus would provide for a safe swimming area that is not subject to strong wave action during typical weather conditions. Under the proposed project, hand launchers and swimmers would both be using Seaside Lagoon. This use of water area by varied types of users is similar to public beaches and other public water recreational areas and would not pose a unique safety hazard. While kayakers and paddle boarders are expected to leave the area within this breakwater to enter the main harbor, the use of the Seaside Lagoon by swimmers is anticipated to be similar to a wading beach, with recreational swimmers staying within the sheltered waters. Longer

distance (ocean) swimmers would be expected to leave from the County beaches to the south of the project site as there would be easier access to the open ocean from those beaches (i.e., no harbor traffic).

Operational controls will be established as needed to separate swimmers and those launching watercraft. This would entail using markers such as ropes and buoys to designate a launch lane and/or swimming area. Signage and walkways throughout the project site would provide safe access routes and directional information for pedestrians and bicyclists coming to visit Seaside Lagoon from the bike path, parking structures or elsewhere in the project site.

3. Water Quality

Comments have raised concerns about the water quality of the lagoon once it is opened to the harbor. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.A4th 369, 392.*) Nevertheless, the issue was discussed in Section 3.8, Hydrology and Water Quality of the Draft EIR, which details and analyzes the potential impacts of the proposed project on water quality. As discussed therein, the project would not exacerbate existing water quality in King Harbor, and would result in water quality improvements. Under existing conditions the project site is composed of approximately 79 percent impervious surfaces and results in stormwater (including any pollutants associated therewith) draining into King Harbor. (Draft EIR, pages 3.8-7 through 8.) With implementation of the proposed project, there would be a reduction in impervious surfaces in comparison to baseline, and infiltration/retention facilities would be incorporated to capture the first 0.75 inches of rain (during a 24 hour period). (Draft EIR pages 3.8-58 through 59.) Furthermore, Seaside Lagoon currently requires chemical treatment to remove chlorine prior to draining the water into the King Harbor; with implementation of the proposed project, this chemical treatment would no longer be required. (Draft EIR page 3.8-61.) Water circulation modeling also indicates that the modifications to Seaside Lagoon would not change the water exchange time in the harbor, and that Seaside Lagoon would have shortest exchange time out of the three marina basins. (Draft EIR page 3.8-63.) A shorter exchange time is more desirable for water quality as greater water exchange and mixing of harbor waters with ocean water would serve to flush and dilute contaminates in the water, including trash and animal wastes.

It should also be noted that water in the lagoon is salt water from the harbor used as cooling water pipes for the AES power plant. It currently receives no treatment other than chlorination at entry into the lagoon and dechloriation prior to discharge into the harbor. While the chlorination would address bacteria that may be present in the harbor water, toxicity, metals or other non-bacterial components that may be present in harbor water would also be present in the lagoon under existing conditions.

Furthermore, starting on page 3.8-60, the Draft EIR explains that the proximity of the proposed launch ramp to Seaside Lagoon is not expected to negatively affect the water quality within Seaside Lagoon. The City has also identified existing marine best management practices (BMPs) that boats using King Harbor are required to comply that would reduce the potential of discharges to occur within the harbor, including in proximity to boat ramp and Seaside Lagoon. The marine BMPs address boat yard operations, boating and boat operations, commercial business operations, and fuel dock operations. Additionally, Seaside Lagoon is located near the mouth of the harbor and as such, the lagoon would have better circulation than other parts of King Harbor. The water circulation would mix and better dilute any bacteria or other contaminants that could be present. Draft EIR pages 3.8-44 and 3.8-62 further explains that Seaside Lagoon would also be subject to regulatory testing for total coliform, fecal coliform, enterococci, streptocooci, and chemical pollutants, including but not limited to PCBs, PAHs, and

mercury. In the unlikely event that violations occur, notices would be posted until testing indicates that levels comply with state standards.

While Draft EIR Section 3.8 and Draft EIR Appendix D (starting on page 36) provided water quality information in the vicinity of the project, additional water quality testing was performed in April 2016 at four locations in King Harbor, including two locations within the small breakwater just south of Seaside Lagoon and two locations in the main channel west of the Turning Basin. Testing results show that indicator bacteria were well below limits for water near public beaches. Further, other constituents (oil and grease, total suspended solids, metals, and pesticides) were below detection levels. The April 2016 testing results are included as an appendix to the Final EIR. (Please see Final EIR Chapter 3).
Water monitoring is conducted on a regular basis 100 yards south of the Horseshoe Pier. This information was presented in Section 3.8 of the Draft EIR. While these water quality results may be indicative of water quality within certain areas of the harbor, other variables at the testing location, including proximity to a storm drain, the Monstad Pier and the concentration of birds that have historically surrounded the pier to the monitoring site, may impact the quality of the data (e.g., water quality near untreated storm drains may be lower as a result of flows emanating from the drain and water quality in the vicinity of piers may be affected by the concentration of birds congregating on piers). Further, in 2015, summer diversions and a September sewage spill from Hyperion Treatment Plant negatively affected the local water quality. These factors likely contributed to the Horseshoe Pier (a.k.a., Redondo Municipal Pier) having poor water quality in the state of California by Heal the Bay in the 2015 – 2016 Beach Report Card.[12] No diversions from Hyperion Treatment Plant are planned for summer 2016 and the City's implementation of a program to use falcon and owls to deter birds from occupying the pier are expected to boost water quality near the pier (by reducing avian droppings). While water quality can certainly vary from year to year, and during different seasons of the year, the proposed project would improve the harbor's water quality and the Seaside Lagoon would be subject to regulatory water quality testing as noted above. Furthermore, while reduced water quality conditions can occur during the winter rainy seasons (due to stormwater flow), potential lagoon users are less likely to engage in swimming during the wet winter months.

Several comments suggest that Seaside Lagoon would have similar water quality as Mother's Beach in Marina del Rey. Mother's Beach is in a sheltered basin enclosed within the Marina del Rey Harbor; it has poor water circulation and lack of wave action, which contributes to a poor water quality.[13] As discussed above and in the Draft EIR on page 3.8-63, Seaside Lagoon is close to the harbor mouth and a better water circulation the most areas of King Harbor. Therefore, it would not have the problems associated with poor water circulation that occur at Mother's Beach. In the past, Inner Cabrillo Beach has been also repeatedly given poor grades for water quality, even after implementation of features designed to improve this situation, including replacement of leaking sewers in the area and installation of pumps to enhance water circulation. In part, the poor water quality is attributed in part to eelgrass beds in the vicinity of Cabrillo Beach that provide a source of bacterial contamination and restrict water flow. Sediments and detrital material erode from the eelgrass beds due to tidal conditions and are then carried to Cabrillo Beach. There are no eel grass beds in King Harbor and thus, given the different conditions, poor water quality at Inner Cabrillo Beach and Mother's Beach cannot be used as indicator of water quality at

[12] Heal the Bay. 2016. Heal the Bay's 2015-2016 Annual Beach Report Card. Available at http://www.healthebay.org/sites/default/files/BRC_2016_final.pdf. Measurements for this water quality test were taken 100 yards south of the Municipal Pier, which is approximately 2,300 feet south of the proposed entrance to Seaside Lagoon.

[13] Heal the Bay. 2015. Heal the Bay's 2014-2015 Annual Beach Report Card. Available at: http://www.healthebay.org/sites/default/files/pdf/beachreportcard/1_BRC_2015_Beach_Report_Card_%28full%29.pdf

Seaside Lagoon. Beginning in 2014, the water quality has improved in Cabrillo Beach, which is likely due to several factors, including California's on-going drought, which reduces the amount of urban runoff flowing into the water. Additionally, in 2013, wiring was installed to keep birds away from the beach which is also a likely contributor to improved water quality.

The proposed project also offers additional water quality benefits by reducing the amount of contaminated stormwater runoff. Under existing conditions, the project site is composed of approximately 79 percent impervious surfaces and results in stormwater (including any pollutants associated therewith) draining into King Harbor (Draft EIR, page 3.8-7 through 8). With implementation of the proposed project, there would be a reduction in impervious surfaces in comparison to baseline, and infiltration/retention facilities would be incorporated to capture the first 0.75 inches of rain (during a 24 hour period) (Draft EIR pages 3.8-58 through 59).

4. Sea Lions

Section 3.3, Biological Resources of the Draft EIR addresses the current and anticipated future issues at the project site associated with pinnipeds (specifically the California sea lion and the harbor seal). Starting on page 3.3-44 of Section 3.3, the analysis details how the proposed project includes a number of actions to expand connectivity of land and water facilities for the public. Such actions include addition of launch ramp boarding floats, construction of a breakwater, and the connection of Seaside Lagoon to create a protected cove. The opening of Seaside Lagoon to harbor waters would make the lagoon and beach area accessible to pinnipeds. Seaside Lagoon is expected to be an active land and water public use area, and would have constrained entrance to the embayment because of the breakwalls. Additionally the Turning Basin has a high level of watercraft activity. These features and activities are expected to be a deterrent to sea lion use of the site as haul-out. Furthermore, there are existing alternative locations, which are more conducive for sea lion haul-outs within the harbor, such as the floating platform. Therefore, it is not anticipated that sea lions would use the beach at the modified Seaside Lagoon as a haul out in substantial numbers. However, the sea lion population within southern California is increasing, and under certain conditions, such as years with higher populations of sick and malnourished animals, small open lagoons such as the proposed opening of Seaside Lagoon, have been used by sea lions to haul-out. As described further in Section 3.3, there are examples of sea lions using sandy beaches as haul out locations in southern California, such as La Jolla Cove and Kellogg Beach in San Diego. Also, there are other sandy protected beaches that do not have a history of being used as haul outs, such as Mother's Beach in Marina del Rey and Baby Beach in Dana Point. Although it is not anticipated that sea lions would move into the lagoon during the peak of the summer season (particularly due to high public use in the lagoon), during low use periods of winter sea lions may try to make use of the protected area as a haul-out, during high surf and storm periods when the protected beach area provides increased protection against weather. However, as described above, sea lions prefer areas away from human activity and thus, public use within the lagoon and would be a detractor from sea lion occupancy as a haul-out year around and it is expected that the floating platform, breakwaters, and docks elsewhere in the harbor that are currently used by sea lions would be the first choice for sea lion haul-out.

Implementation of the opening of Seaside Lagoon and the small craft boat launch facility would not result in a substantial adverse impact on a sensitive species (pinnipeds) in comparison to existing conditions; therefore, the Draft EIR determined that impacts would be less than significant. However, given that under existing conditions, the potential of undesirable human-pinniped interactions is growing, it is appropriate to monitor sea lion activities and respond early with deterrents prior to the development of more serious problems. Therefore, while impacts of the proposed project are less than significant, the City is proposing a Condition of Approval (COA) as part of its Conditional Use Permit procedures that would set in place deterrent methods to prevent sea lions and other pinnipeds from establishing a presence

in the lagoon. COA BIO-3: Marine Mammal Management Program includes a marine mammal management program to be prepared and implemented by the City of Redondo Beach prior to the opening of Seaside Lagoon to harbor waters to deter pinnipeds from establishing a regular presence in the lagoon or immediate vicinity. The program includes education, signage and animal control steps and staff working with marine mammal rescue organizations and the National Marine Fisheries Service Southwest Region Marine Mammal Stranding Network. Please see Section 3.3, Biological Resources of the Draft EIR for additional details.

MASTER RESPONSE NO. #5: SPORTFISHING PIER, POLLY'S, AND SPORTFISHING

Many comment letters requested that the City consider renovating the Sportfishing Pier and Polly's on the Pier in lieu of demolition. There were also comments in support of the rebuilding of the pier after it is demolished. These commenters' request and concerns regarding the pier and associated businesses were generally associated with: 1) local importance of the pier and Polly's; 2) maintaining existing local businesses, specifically Polly's and Redondo Beach Sportfishing; and 3) removal of fishing opportunities within the project site. Following is a background of the proposed project element associated with the Sportfishing Pier (including Polly's and Redondo Beach Sportfishing) and information related to the three comments listed above:

Background

As described in Table 2-2 on page 2-43 in Chapter 2, Project Description, the Draft EIR analysis of the proposed project includes two project element options associated with the Sportfishing Pier: removal or removal/replacement. If the pier were not replaced, the square footage associated with the buildings on the pier would be relocated into the northern landside development. If replaced, a new pier (concrete or timber) and building would be constructed in a similar configuration as currently exists. Both options include the demolition of the Sportfishing Pier and its buildings.

1. Local Significance of the Sportfishing Pier and Polly's:

As detailed in Section 3.4, Cultural Resources, starting on page 3.4-51, and project-specific historical resources investigation (Appendix E2), both in the Draft EIR), the Redondo Sportfishing Pier (including the buildings on the pier, such as Polly's) appears eligible for designation as a Redondo Beach landmark under Criteria A, B, and E of the City's local landmark criteria (although there is no official designation) for its association with events and persons that have made a significant contribution to Redondo Beach history. Consequently, the Sportfishing Pier (including buildings) was considered a Historical Resource in the Draft EIR. (Draft EIR pp. 3.4-1 and 3.4-2.) Per Section 3.4-65 of the Draft EIR, avoidance, relocation, and partial retention of these resources is not possible due to the existing condition of these structures. As discussed under Alternative 1 in Section 4.4.1 of the Draft EIR, given the poor condition of the Sportfishing Pier, it would need to be closed to the public in the future due to safety considerations. Regarding the existing structural condition of these structures, as detailed in Section 3.5.2.3 Existing Structural Conditions in Section 3.5 Geology and Soils (starting on page 3.5-18) of the Draft EIR, inspections of the Sportfishing Pier found the condition of the pier structures to be in very poor condition and any attempt to repair or replace existing piles and decks was determined to require demolition of a portion of the existing buildings and decks to sufficiently expose the bottom and allow equipment to repair and replace the structures. This essentially translates to nearly total demolition and replacement of the existing piers and buildings, which would result in removal or alteration to these potentially historical resources; therefore, even with implementation of mitigation measures (i.e., MM CUL-1 Recordation and MM CUL-2 Interpretive Program) a significant unavoidable impact would occur to the Sportfishing Pier (including the buildings).

2. Maintaining Existing Local Businesses (specifically Polly's and Redondo Beach Sportfishing):

As noted in Table 3.9-3, under Policy 1.7.1, on page 3.9-32 in Section 3.9, Land Use and Planning in the Draft EIR, the proposed project would include a mix of coastal-related retail and service uses, while no specific tenants are identified at this time, the businesses located at the site would support the commercial, coastal and recreational setting at the project site. This is anticipated to include establishments such as (but not limited to) marine-related commercial recreation businesses (e.g., charter boats and marine-recreation equipment rentals), coastal-related retail (e.g., beach-related goods such as towels, swimsuits, and sunglasses and souvenir stores), and seafood stores and restaurants. Some of the current tenants would be given the opportunity to remain at the project site in addition to new businesses that would be established. The specific tenants/businesses that could be retained would be determined in later phases of the project and are not required to be identified during the environmental review process. In accordance with CEQA, the EIR identifies the types of uses that would be located within the project site to analyze the physical environmental impacts associated with the proposed project.

3. Fishing Opportunities Within the Project Site:

As addressed throughout the Draft EIR, including, in particular, Chapter 2, Project Description (page 2-19) and Section 3.12 Recreation (page 3.12-6), the Sportfishing Pier is a destination for anglers (fishing from the pier and fishing charters). There are benches, restrooms, a fish cleaning station, restaurant, and sport fishing charter business. The southern ramp of the Sportfishing Pier is utilized daily for a half-day fishing charter. The Redondo Sportfishing building on the pier also sells and rents tackle and equipment, including rental rods and reels, and fishing licenses. If the Sportfishing Pier were replaced, features that may be included at the reconstructed pier are boat mooring and passenger loading ramps/gangways on each side of the pier to allow the safe berthing of modern sportfishing and sightseeing boats. If the Sportfishing Pier is not replaced, boat mooring and passenger loading for charter boats and sightseeing boats could occur at the proposed new gangways and side tie area proposed just outside the reconstructed/redeveloped Redondo Beach Marina, west of the proposed pedestrian/bicycle bridge. Pier fishing would continue to be available from the Horseshoe Pier and the adjacent Monstad Pier (immediately adjacent to the project site). Therefore, recreational fishing opportunities would continue to be available with implementation of the proposed project.

MASTER RESPONSE NO. #6: SUMMARY OF TRAFFIC IMPACTS ASSOCIATED WITH THE OPERATION OF THE PROPOSED PROJECT

Several comment letters expressed general concerns regarding traffic associated with the proposed project. In addition, comments were received regarding weekend traffic. The following is brief summary of the operational traffic analysis, in response to those general concerns. For comments that were specifically directed at particular aspects of the traffic analysis presented in the Draft EIR, such comments are addressed by individual responses provided later in this section.

1. Summary of Vehicular Traffic Conclusions

A description of the project's traffic and transportation impacts and mitigations is provided in Section 3.13, Traffic and Transportation, of the Draft EIR. As shown in the Draft EIR on Table 3.13-11 (page 3.13-42), the proposed project is estimated to generate a maximum increase of 12,550 daily, 344 AM peak hour, and 782 PM peak hour net new trips on top of the existing trip generation to the project site. The analysis took into consideration new trips generated by the project's proposed land uses as well as shifts in traffic patterns related to the proposed Pacific Avenue Reconnection. The majority of project

trips will not travel on the Pacific Avenue Reconnection, but the trips that do will be more direct, so will result in shorter vehicle miles traveled. The assumption for Pacific Avenue Reconnection was that project traffic represents approximately nine percent of the peak hour trips. While the project will bring additional vehicle trips to the area, the forecasted level of increase will be less than significant at all analysis locations after mitigation measures are implemented.

For signalized intersections, the following five intersections would be significantly impacted during the PM peak hour under Existing plus Project Conditions, and would also be significantly impacted during the AM peak hour and/or PM peak hour under Cumulative plus Project Conditions:

- Intersection 7: PCH/Catalina Avenue & Herondo Street/Anita Street
- Intersection 10: PCH & Catalina Avenue
- Intersection 19: PCH & Beryl Street
- Intersection 26: PCH & Torrance Boulevard
- Intersection 36: PCH & Palos Verdes Boulevard

Implementation of the mitigation measures would reduce the impacts under Existing plus Project Conditions and Cumulative plus Project Conditions to a level that is less than significant at all five intersections.

Based on the applicable criteria for determining significance for unsignalized intersections, the following one intersection would be significantly impacted during the PM peak hour under Cumulative plus Project Conditions (for information on what went into the cumulative analysis, refer to Master Response #2: Cumulative Analysis).

- Intersection 6: Valley Drive/Francisca Avenue & Herondo Street

A proposed mitigation measure for that intersection would reduce the impact to a level that is less than significant. The proposed mitigation measures are shown in Section 3.13 of the Draft EIR (beginning on page 3.13-69) and repeated below.

MM TRA-1: Valley Drive/Francisca Avenue & Herondo Street (Intersection 6) – City of Hermosa Beach: A traffic signal would be installed at this intersection, for which the project Applicant would provide fair share funding.

MM TRA-2: Pacific Coast Highway & Herondo/Anita Street (Intersection 7): An additional westbound and eastbound through lane would be added. For the westbound approach, the center-raised median would be narrowed or eliminated. The two westbound left turn lanes would be shifted to the south to accommodate the additional westbound through lane. An additional westbound receiving lane would be added extending for a minimum of half a block length to the west of Intersection 7. The on-street angled parking on Herondo Street conflicts with the additional eastbound and westbound lane, and will require their removal. Parking will be replaced at 1:1 ratio to the satisfaction of the City Engineer, which could include, but not be limited to, off-street parking at the Triton Site, which is located northwest of Portofino Way and Harbor Drive. In addition, the on-street bike lanes would be shifted from their current location, but can be accommodated with the addition of the two through lanes.

MM TRA-3: Pacific Coast Highway & Catalina Avenue (Intersection 10): One additional eastbound left turn lane would be added to provide two left turn lanes onto Pacific Coast Highway northbound. The

intersection would also be restriped to provide one shared left-right lane, for a total of three lanes on the eastbound approach.

MM TRA-4: Pacific Coast Highway & Beryl Street (Intersection 19): Add a southbound dedicated right-turn lane. This additional lane would encroach into the existing sidewalk right-of-way of the Gertruda Avenue cul-de-sac, and require the removal of mature trees that line the western side of the street. The sidewalk would need to be reconstructed to the west of its current location, which would narrow the end of the cul-de-sac.

MM TRA-5: Pacific Coast Highway & Torrance Boulevard (Intersection 26): A northbound and eastbound right-turn lane would be added to this intersection to mitigate the project's impact. The northbound right-turn lane is an approved project identified as mitigation from a prior project in the City, and therefore, the Applicant would provide a fair share contribution for these improvements. The eastbound right-turn lane can be accommodated through restriping the outer eastbound lane on Torrance Boulevard, which measures 24 feet.

MM TRA-6: Pacific Coast Highway & Palos Verdes Drive (Intersection 36): Add a southbound right-turn lane. The project Applicant shall provide a fair share percentage of contribution to this mitigation measure along with other development projects that would impact this intersection.

The following figures (Figures 3.13-10 through 3.13-14 from Section 3.13 of the Draft EIR) show the proposed mitigation measures relative to the affected streets and intersections for mitigation measures MM TRA-2 through MM TRA-6. As mitigation measure MM TRA-1 is a signalization measure, no figure is presented for that measure.

In summary, with the implementation of mitigation measures MM TRA-1 through MM TRA-6, the project impacts at intersections within the study area would be reduced to a level that is less than significant.

2. Weekend Traffic

Several comments were received regarding the lack of a weekend analysis in the traffic study for the proposed project (Appendix L1 of the Draft EIR). The City's traffic guidance for the Redondo Waterfront Project define significant traffic impacts based on changes in weekday AM and PM peak hour conditions caused by a project, as weekday conditions, which are typically worse than the weekend peak hour conditions due to the effects of weekday work and school related activity.[14] This is also consistent with the LA County Congestion Management Program (CMP) which notes that "Both 'peak hour' and 'daily' refer to average weekdays, unless special seasonal variations are expected" and states that "traffic counts must exclude holidays…[and are] taken on days when local schools or colleges are in session." (2010, LA County Congestion Management Program.) As noted on Draft EIR page 3.13-13, the traffic

[14] The City of Redondo Beach has also explained this approach in Kensington Assisted Living Project Final EIR, certified on January 19, 2016 (project located in the Coastal Zone). (Resolution No. CC-1601-006 [certifying resolution].) As discussed in the Kensington Response to Comment B-6: "The traffic impact analysis prepared for the Kensington Assisted Living project was completed based on the traffic study guidelines for the City of Redondo Beach and a scoping agreement that was submitted and agreed upon by the City of Redondo Beach Transportation Department. *A traffic impact analysis typically analyzes the weekday morning and evening peak hours* when school is in session in areas located close to schools. This coincides with when the assisted living facility employees are expected to arrive/depart the project site. Although beach specific traffic/parking is greater on weekends, *overall ambient traffic is usually greater on weekdays.*"

analysis utilized traffic counts from summer of 2013 and spring of 2014, and then selected the highest number from the two set for the Waterfront traffic analysis. Consequently, seasonal variations are already incorporated into the analysis.

As also noted under CEQA Guidelines Section 15204(a) "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." As also discussed by the Court of Appeal in *San Joaquin Raptor v. County of Merced* (2007) 149 Cal.App.4th 645, the EIR for a mining project did not to provide an additional traffic analysis assuming that trucks sometimes enter and leave the project site "unevenly over time." In reaching this conclusion the Court of Appeal stated: "We hold that such minute detail was not required in the analysis in question." Similarly, the Court of Appeal determined that weekend traffic analysis was not required for the City of Huntington Beach's 336 acre Downtown Specific Plan in the Coastal Zone[15] in *Huntington Beach Neighbors v. City of Huntington Beach* (2012 4th Dist. Case No. G045732) 2012 WL 5330887:

> In determining the impact of additional traffic that would be generated by contemplated development, a traffic study was conducted midweek on a summer weekday between 7:00 and 8:45 a.m. and 4:00 and 5:45 p.m. at 12 different locations… Plaintiff also challenges the baseline used to analyze traffic for two reasons. It asserts the bulk of the additional development will not be open for business during the times used in the study. Additionally, it argues the study failed to monitor weekend traffic, particularly summer weekends, and special events. These claims do not persuade. [¶] First, there is no support for the assertion office, retail, and tourist attractions will not be open during the times traffic was measured. Plaintiff points to no evidence in the record on which it bases this conclusion. The EIR sets out the methodology used, noting it complied with City, County, and California Department of Transportation (CalTrans) requirements and relied on the standard Level of Service system. Plaintiff does not overcome the substantial evidence supporting the findings of the traffic consultant, which relied on a nearly 1,000–page Traffic Impact Analysis to compile its almost 50–page Traffic Analysis. (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, supra, 40 Cal.4th at p. 427.)…[¶] Second, defendants, not this court or plaintiff, decide the proper baseline to be used. In *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, where the impact of a refinery was being considered, the court stated: "We do not attempt here to answer any technical questions as to how existing refinery operations should be measured for baseline purposes in this case or how similar baseline conditions should be measured in future cases.... [¶] Neither CEQA nor the CEQA Guidelines mandates a uniform, inflexible rule for determination of the existing conditions baseline. Rather, an agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence. [Citation.]" (Id. at pp. 327–328.) As noted above, plaintiff has not negated the existence of substantial evidence in support of the EIR's conclusion and we must presume defendant's certification of the EIR was proper. (*Sierra Club v. City of Orange*, supra, 163 Cal.App.4th at p. 530.)

[15] http://www.huntingtonbeachca.gov/government/departments/planning/major/DTSP.cfm

Source: Fehr & Peers, 2015

N

Source: Fehr & Peers, 2015

Draft EIR Figure 3.13-11

The Waterfront Final EIR Mitigation Diagram - MM TRA-3: #10 Pacific Coast Highway at Catalina Avenue

Source: Fehr & Peers, 2015

N

Mitigation Diagram - MM TRA-4: #19 Pacific Coast Highway at Beryl Street

Source: Fehr & Peers, 2015

Draft EIR Figure 3.13-13

The Waterfront Final EIR Mitigation Diagram - MM TRA-5: #26 Pacific Coast Highway at Torrance Blvd

Source: Fehr & Peers, 2015

N

Draft EIR Figure 3.13-14

The Waterfront Final EIR Mitigation Diagram - MM TRA-6: #36 Pacific Coast Highway at Palos Verdes Drive

While the City does not believe a weekend analysis needs to be prepared to comply with CEQA, a weekend analysis was completed in order to assess whether or not the proposed project could potentially result in any additional significant traffic impacts during the weekend peak hour beyond those already identified in the Draft EIR. As outlined in greater detail below, the weekend analysis would not result in any new significant impacts, and all impacts would be less than significant with mitigation.

The weekend mid-day[16] level of service (LOS) baseline results were compared to the weekday PM peak hour baseline results in the Draft EIR at 14 of the study intersections in the vicinity of the project using weekend mid-day traffic count data collected in Summer 2013 (the same year as the weekday summer data collection for the analysis in the Draft EIR). These location generally represent intersections with the highest likelihood of project-related traffic impacts, as well as the locations that would have the highest likelihood of weekend traffic operations being similar to (or worse than) weekday operations. As detailed in Table 2-2, the baseline PM peak hour and the baseline weekend mid-day volume to capacity (V/C) ratios and intersection LOS results were compared at 14 locations, and the baseline weekend mid-day LOS results were the same or better than the corresponding weekday afternoon LOS results at all of the locations, with the exception of Pacific Coast Highway & Torrance Boulevard (Intersection 26), which has a slightly higher V/C ratio than the weekday PM peak hour (a difference of .008 or 0.8 percent V/C), but continues to operate at LOS D for both the weekend midday and weekday PM peak hour. As noted on Draft EIR page 3.13-46, the operational traffic significance thresholds are based upon the underlying LOS value, consequently, the significance threshold for this intersection would remain the same as the PM peak hour thresholds.

Consistent with the weekday analysis, trip generation estimates for the Project were prepared, in part, using *Trip Generation, 9th Edition (*Institute of Transportation Engineers, 2012). Weekend trip generation rates were based upon the land use categories described in Table 3.13-11. However, only peak hour of generator rates are available for Saturday in *Trip Generation*. Because different uses peak at different times (e.g. retail peaks during the midday period and restaurant uses peak later in the afternoon/evening) applying peak hour of generator trip rates for different uses at the same time would result in an overly conservative trip generation estimate. To account for the hour by hour variation in traffic for the uses in the project, hourly parking demand factors by land use were obtained from the Urban Land Institute (ULI) shared parking model. The ULI hourly variation factors in parking accumulation by land use were weighted based on the land use mix of the project, and 1:00 PM to 2:00 PM was determined to be the peak hour for weekend midday trip generation at the project site. During that hour, based on the application of ULI shared parking hourly variation factors, retail would be expected to be eight percent less than its peak generator rate, and the movie theater would be approximately 54 percent less, quality restaurant would be 42 percent less, high turnover restaurant would be 13 percent less, hotel would be 30 percent less, and office would be 20 percent less. These adjustments would result in a weekend midday peak hour trip generation estimate that is approximately 28 percent less than if the analysis applied the unrealistic scenario of the peak hour of generator rates for different land uses occurring at the same time.

[16] The weekend mid-day peak hour occurs during a different time period from the weekday peak periods, due to the lack of worker commuter trips and trips to and from schools, and is generally noon to 2 PM.

Table 2-2: Weekend: Existing Conditions Intersection Level Of Service

Intersection	Saturday Midday Peak Hour		PM Peak Hour	
	LOS	V/C	LOS	V/C
4. Harbor Dr/Hermosa Ave & Herondo St	A	0.481	A	0.491
7. Pacific Coast Hwy/Catalina Ave & Herondo St/Anita St	C	0.791	E	0.989
10. Pacific Coast Hwy & Catalina Ave	C	0.751	D	0.883
11 Harbor Dr & Marina Way	A	0.398	A	0.459
12. Catalina Ave & Gertruda Ave	A	0.445	A	0.540
15. Harbor Dr & Portofino Way/Beryl St	A	0.487	A	0.592
16. Catalina Ave & Beryl St	A	0.454	A	0.565
19. Pacific Coast Hwy & Beryl St	C	0.750	E	0.901
22. Catalina Ave & Diamond St	A	0.368	A	0.444
25. Catalina Ave & Torrance Blvd	A	0.462	A	0.475
26. Pacific Coast Hwy & Torrance Blvd	D	0.856	D	0.848
29. Catalina Ave & Pearl St	A	0.368	A	0.373
34. Pacific Coast Hwy & Knob Hill Ave	B	0.638	B	0.698
39. Pacific Coast Hwy & Pier/14th St	B	0.657	C	0.703

Source: Fehr and Peers, 2016

This weekend analysis used the same MXD trip generation calibration adjustment percentage as those utilized for the weekday analysis. This results in a conservative weekend analysis because internal trip capture is likely to be greater on weekends when visitors are more likely to visit multiple uses within the project site in comparison to weekdays (due to additional leisure time), and because pedestrian and bicycle trips to the project site are likely to be higher from the surrounding neighborhood (i.e. greater leisure time on the weekends means individuals are more likely to use an alternative mode of transportation, and therefore less likely to utilize a motor vehicle).

As detailed in Table 2-3, the weekend mid-day trip generation estimates result in 909 net new project related trips during the Saturday midday peak hour, compared with 782 PM peak hour trips.

Table 2-3 presents the intersection impact analysis results for the Existing plus Project and the Cumulative plus Project scenarios. Both scenarios were developed in the same fashion as the corresponding weekday scenarios, as described in Draft EIR page 3.13-43 ("Analyzed Scenarios").[17]

As shown in Table 2-3, significant project-related weekend midday peak hour results are expected at the following three intersections under both the Existing plus Project and Cumulative plus Project conditions:

- Pacific Coast Highway & Herondo Street/Anita Street (Intersection 7)
- Pacific Coast Highway & Torrance Boulevard (Intersection 26)
- Pacific Coast Highway & Palos Verdes Boulevard (Intersection 36)

As indicated in the Draft EIR, all three of these intersections are also expected to be significantly impacted during the weekday PM peak hour. None of the other intersections analyzed for weekend midday peak hour are expected to be significantly impacted. The mitigation measures described above and in the Draft EIR for these locations were analyzed to determine whether the measures would also mitigate significant traffic impacts during the weekend midday peak hour. As shown in Table 2-4, all weekend midday peak hour impacts are fully mitigated with the same mitigation measures proposed for these locations in the Draft EIR. Therefore, no new significantly impacted locations were identified with the weekend analysis and all impacts would be less than significant with mitigation. Even without the 28 percent ULI adjustment described above, the project would be within the scope of the proposed project's weekday analysis (i.e. all impacts would be reduced to less than significant with the proposed mitigation measures).

[17] Because a weekend midday peak hour traffic count was not available for Pacific Coast Highway & Palos Verdes Boulevard (Intersection 36), the PM peak hour traffic count was used, with the application of the weekend midday trip generation for the Project. As shown in Table 1, the PM peak hour LOS results were generally worse than the weekend midday peak hour results, so the use of the PM peak hour count, with the weekend midday peak hour trip generation is likely to overstate the potential for weekend impacts at this intersection.

Table 2-3: Redondo Waterfront Project Trip Generation Estimates (Weekend Analysis)

LAND USE	SIZE	UNITS	ITE Land Use Code/Source [a]	Trip Generation Rates				Estimated Trip Generation			
				Daily Rate	WEEKEND MIDDAY PEAK HOUR			Daily Trips	WEEKEND MIDDAY PEAK HOUR		
					RATE [a]	IN	OUT		IN	OUT	TOTAL
Proposed Project											
Retail	97.0	KSF	820	Equation	Equation	52%	48%	9,064	410	379	789
Movie Theater	700	Seats	444	2.24	0.21	56%	44%	1,568	82	65	147
Quality Restaurant	136.0	KSF	931	94.36	6.28	59%	41%	12,834	504	350	854
High Turnover Restaurant	45.0	KSF	932	158.37	12.28	53%	47%	7,127	293	259	552
Hotel	130.0	Rooms	310	8.19	0.51	56%	44%	1,065	37	29	66
Office	60.0	KSF	710	2.46	0.34	54%	46%	148	11	10	21
Subtotal Project Trips (base ITE rates)								31,806	1,337	1,092	2,429
MXD model calibration of base ITE rates reflecting project & site specific characteristics								-5,691	-447	-365	-812
Boat Launch Ramp	40.000	Stalls						160	4	8	12
Project Vehicle Trips (Total)								**26,275**	**894**	**734**	**1,628**
Existing Active Uses [b]											
Restaurant (High Turnover) [c]	30.1	KSF	932	158.37	12.28	53%	47%	4,764	196	173	369
Restaurant (Quality Restaurant) cd]	45.1	KSF	931	94.36	6.28	59%	41%	4,255	167	116	283
Office	71.2	KSF	710	2.46	0.34	54%	46%	175	13	11	24
Retail [d]	31.0	KSF	820	Equation	Equation	52%	48%	4,418	195	181	376
Subtotal Existing Trips (base ITE rates)								13,612	571	481	1,052
MXD model calibration of base ITE rates reflecting site specific characteristics								-2,477	-181	-151	-332
Existing Site Vehicle Trips								**11,135**	**390**	**329**	**720**
NET NEW PROJECT VEHICLE TRIPS								***15,140***	***504***	***405***	***909***

Notes:

[a] Trip generation rates/ fitted curve equations from *Trip Generation*, 9th Edition, Institute of Transportation Engineers, 2012 generally for Saturday daily and Saturday peak hour of the generator. Peak hour of generator trip rates/fitted curve equation were adjusted using ULI shared parking hourly variations in parking demand factors for each land use to reflect a more realistic weekend midday peak hour analysis. Since land uses peak at different times, applying peak hour of generator uses for all land uses would result in an unrealistically high trip generation estimate.

[b] Gross leasable area that was occupied at the time baseline traffic counts were collection (Summer 2013, Spring 2014). Because fewer spaces were occupied in Summer 2013, and therefore the trip generation credit for existing uses would be smaller) the summer 2013 GLA data were used.

[c] Existing restaurant uses at the project site include a variety of types, include quality restaurant (typically closed for breakfast on weekdays), and high-turnover restaurant (typically open for breakfast). Assumed 60% quality restaurant and 40% high turnover restaurant. Quality restaurant's generate fewer trips than high-

[d] Existing retail includes the existing arcade.

[f] Average trip length of 6.88 miles calculated for the project site using an enhanced version of the Southern California Association of Government's (SCAG) Travel Demand Model.

Source: Fehr and Peers, 2016

Table 2-4: Redondo Waterfront Project - Saturday Midday Peak Hour Analysis

Int	Street 1	Street 2	Existing		Existing plus Project		V/C Change	Impact?	Cumulative Base		Cumulative plus Project		V/C Change	Impact?	Cumulative Base		Cumulative plus Project with Mitigation		V/C Change	Impact?
			LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C		
4	Harbor Dr/Hermosa Ave	Herondo St	A	0.481	B	0.625	0.144	NO	A	0.495	B	0.639	0.144	NO	--	--	--	--	--	--
7	Pacific Coast Hwy/Catalina Ave	Herondo St/Anita St	C	0.791	D	0.846	0.055	**YES**	D	0.821	D	0.877	0.056	**YES**	D	0.821	C	0.798	-0.023	NO
10	Pacific Coast Hwy	Catalina Ave	C	0.751	C	0.780	0.029	NO	C	0.778	D	0.807	0.029	NO	--	--	--	--	--	--
11	Harbor Dr	Marina Way	A	0.398	A	0.495	0.097	NO	A	0.407	A	0.503	0.096	NO	--	--	--	--	--	--
12	Catalina Ave	Gertruda Ave	A	0.445	A	0.471	0.026	NO	A	0.453	A	0.478	0.025	NO	--	--	--	--	--	--
15	Harbor Dr	Portofino Way/Beryl St	A	0.487	B	0.606	0.119	NO	A	0.496	B	0.613	0.117	NO	--	--	--	--	--	--
16	Catalina Ave	Beryl St	A	0.454	A	0.523	0.069	NO	A	0.488	A	0.555	0.067	NO	--	--	--	--	--	--
19	Pacific Coast Hwy	Beryl St	C	0.750	C	0.784	0.034	NO	C	0.778	D	0.812	0.034	NO	--	--	--	--	--	--
22	Catalina Ave	Diamond St	A	0.368	A	0.349	-0.019	NO	A	0.374	A	0.353	-0.021	NO	--	--	--	--	--	--
25	Catalina Ave	Torrance Blvd	A	0.462	A	0.571	0.109	NO	A	0.470	A	0.579	0.109	NO	--	--	--	--	--	--
26	Pacific Coast Hwy	Torrance Blvd	D	0.856	D	0.886	0.030	**YES**	D	0.900	E	0.930	0.030	**YES**	D	0.900	D	0.855	-0.045	NO
29	Catalina Ave	Pearl St	A	0.368	A	0.378	0.010	NO	A	0.373	A	0.384	0.011	NO	--	--	--	--	--	--
34	Pacific Coast Hwy	Knob Hill Ave	B	0.638	B	0.661	0.023	NO	B	0.672	B	0.695	0.023	NO	--	--	--	--	--	--
36	Pacific Coast Hwy	Palos Verdes Blvd	E	0.957	E	0.983	0.026	**YES**	E	0.997	F	1.024	0.027	**YES**	E	0.997	E	0.910	-0.087	NO
39	Pacific Coast Hwy	Pier/14th St	B	0.657	B	0.678	0.021	NO	B	0.669	B	0.690	0.021	NO						

Source: Fehr and Peers, 2016

MASTER RESPONSE NO. #7: WATERFRONT PARKING

Several comment letters voiced concerns associated with parking at the project site, including the: 1) size and location of the parking structures; 2) parking for boaters, stand-up paddle boarders and other harbor users; 3) parking for the boat launch ramp; and 4) the number of parking spaces required and proposed for the proposed project.

While vehicular parking analysis was included in the Draft EIR out of an abundance of caution, the California State office of Planning and Research eliminated parking capacity from its environmental checklist in December 2009, noting that:

> "the amendments eliminate the existing question (f) regarding parking capacity. Case law recognizes that parking impacts are not necessarily environmental impacts (San Franciscans Upholding the Downtown Plan v. City and County of San Francisco, supra, 102 Cal.App.4th at 697.) The focus of the Initial Study checklist should be on direct impacts of a project. Therefore, the question related to parking is not relevant in the initial study checklist." Further noting that "thus, the question in Appendix G related to parking adequacy does not necessarily lead to the development of information addressing actual environmental impacts." (California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97, pp. 76 and 97.)

Nevertheless, the following is a detailed response associated with the concerns:

1. Size and Location of Parking Structures:

Comments were received expressing concern about the size and location of the proposed parking structures, in particular, the new structure located in the northeast portion of the project site. Implementation of the proposed project includes the removal of the surface parking lot in the northern portion of the project site, as well as the replacement of the existing Pier Parking Structure in the southern portion of the project site. A new parking structure is proposed in the northeast corner of the project site (near Harbor Drive and Portofino Way), and a minor amount of parking along the new main street (also in the northern portion of the project site) would be provided. Parking for vehicles/trailers associated with the new small craft boat launch ramp facility would be adjacent to that facility. The concept of replacing surface parking, with parking structures was expressly contemplated in conjunction with the adoption of the current zoning. As discussed in 2008 Administrative Report for the project's zoning regulations: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.)

As noted above, the proposed project includes the replacement of the Pier Parking Structure in the same area of the project site as it is currently. The parking structure at the northeast would be a new structure. The decision to locate the new parking structure at the northeastern boundary of the project site was carefully balanced between providing the greatest public access and making the best use of limited space for recreational and commercial land uses. Accordingly, the majority of parking on the project would be in two structures that would be located the furthest from the water's edge as possible. The parking structures are designed to improve access, visibility and signage, and to get visitors into parking quickly and easily at the perimeter of then and then out of their cars and into the waterfront experience.

Under existing conditions the project site has lot coverage of approximately 546,056 square feet (or over 12 acres) of surface and structured parking footprints (not including Joes Crab Shack). Under the proposed project, the site would consist of approximately 184,879 square feet (or just over four acres) of surface-and structured parking footprints. Therefore, as noted above, the proposed project would increase " … the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." For additional information relative to comments related to views and massing of the parking structure on the northeastern portion of the project, see Master Response #9: Views and Scale of Development.

2. Parking For Boaters, Stand-Up Paddle Boarders And Other Harbor Users:

Comments were received regarding the accessibility of parking for recreational users of the project site, in particular parking for boaters, stand-up paddle boarders (SUP'ers), visitors to Seaside Lagoon, and other Harbor users. Following is a general discussion followed by a more detailed discussion of the issues by topic. Parking associated with the boat launch ramp facility (including trailer parking) is addressed under Item #3 below.

The parking under the proposed project is distributed to provide for parking access in the vicinity of all the various recreational and commercial uses. As discussed under Item #1 above, most of the parking is provided in two parking structures along the perimeter to maximize the space available on-site for recreational and commercial uses; however, there is also surface parking located within the site along the new main street that will provide required American with Disabilities Act (ADA) parking, as well as first come first served short-term and long-term parking in the vicinity of site amenities and harbor access points. Following addresses specific locations cited in the comments:

Parking and Access for Seaside Lagoon Users

Several members of the public provided comments related to parking and accessing Seaside Lagoon. In particular, concern was expressed that people carrying recreational supplies and equipment (such as stand-up paddle boards, coolers, etc.) and families with young children would be required to walk through a parking garage and the retail area to reach the lagoon, which is alleged to be a deterrent and a potential safety hazard. While the primary parking for visitors to Seaside Lagoon would be in the parking structure at the northeastern corner of the project site, there are also surface parking stalls proposed along the new main street at the eastern edge of Seaside Lagoon. The new main street road and associated parking stalls would provide Seaside Lagoon access, and would include provisions for designated short-term loading and unloading of recreational equipment/supplies at the lagoon (i.e., dropping off coolers, paddleboards, passengers, etc.) and would provide handicapped access to the site. There would also be surface parking stalls available, on a first come first serve basis. In addition, storage is planned for paddle boards at the park, so park visitors could secure their equipment at the lagoon, while relocating their vehicle to the parking garage or engaging in other activities. This dropping off of equipment would be similar to existing conditions at the hand launch ramp (although there are no existing storage facilities). There is currently no parking allowed adjacent to the hand launch ramp, but the maintenance access road is often used for vehicle access. Equipment can be dropped off near the ramp entry and vehicles must then be moved to a designated parking stall to the east of the hand launch ramp and lagoon. Currently, on the northern portion of the site, the public can be as much as 700 feet away from the ocean and need to walk through a parking lot before reaching the water and other site facilities and amenities.

It is expected that most visitors to the lagoon coming by car would use the parking structure east of the lagoon, although the Plaza Parking Structure, surface/street parking along the new main street, and parking structure in the southern portion of the project site would be available. Unlike today, clearly

marked signage and walkways throughout the project site would provide safe access routes and directional information to the lagoon from all areas throughout the project, including the parking structures. Bicycle racks would also be available adjacent to the pathway near the lagoon, allowing bicyclists to easily and safely park their bikes and visit the lagoon. Should users of the Seaside Lagoon prefer not to use on-site parking, parking will continue to exist along Harbor Drive and in surface parking lots north of Portofino Way (north of the project site).

Regarding the safety of the parking structure for Seaside Lagoon visitors, including young children, the structure would be designed to meet safety requirements, including drive aisle widths and visibility requirements, and providing pedestrian access and signage. As such, parking in the structure would not pose any greater risks than other parking areas where vehicles and pedestrians are present. Further, the new parking structure would be better lit and provide better pedestrian routes and signage than existing parking structures at the project site. It should also be noted, that the existing surface parking lot east of the lagoon does not have any marked pedestrian access routes. The only pedestrian walkways today are sidewalks along the outer edges of the parking lot and along the driveway access. Depending on a visitor's parking location, visitors to Seaside Lagoon currently have to walk through the open parking lot to reach a sidewalk, or, perhaps more frequently, would cross the open parking lot to have shortest route from their car to the lagoon rather than taking a longer route to reach the sidewalk. Therefore, safety conditions associated with the new parking structure and pedestrian safety would be better under the proposed project in comparison to existing conditions.

Traversing the commercial area and new main street was also cited as a concern by some members of the public. As described above, there would be pathways throughout the project site that provide a variety of routes to the lagoon. Visitors could choose to take the most direct route, which, depending on the starting point, may include passing by the commercial uses, or they could choose a route that includes using the boardwalk along the water's edge and/or pathways through the open space corridors, including an open space corridor that leads directly from the parking structure to Seaside Lagoon. Whether walking through the open space corridor or the commercial area, visitors access the site from east of the new main street would be required to cross this street to reach the lagoon. There would be marked pedestrian crossings at regular intervals as well as safety signage for vehicles and pedestrians designed to applicable standards and best practices. This, combined with the fact that there would be slow vehicle speeds along the new main street, would ensure that crossing the new main street to reach Seaside Lagoon would not pose a risk to lagoon visitors. Several members of the public also provided comments related to parking for water-orientated recreation. Please see Section 4 of this Master Response, which addresses this issue.

3. Parking for the Boat Launch Ramp:

Several comments were received regarding the reduction in the amount of trailer parking from the existing number of spaces. Comments were also received on the demand that a boat ramp would cause and that the proposed one- or two-lane ramps would not be sufficient for the demand ('build a ramp and boaters will come'). A detailed response to comments received on the proposed boat launch ramp can be found in Master Response #8: Boat Ramp in King Harbor. Following is a response to comments regarding existing trailer parking and the proposed parking associated with the new small craft boat launch facility and average demand.

There were two main comments regarding parking associated with the existing boat hoists being reduced and need for a similar amount for the proposed boat ramp. As described on page 3.13-34 of the Draft EIR, launch statistics from the two Mole D boat hoists between 1997 and 2014 indicate a progressive decrease in demand of trailered boat launches over the past 17 years. The peak number of monthly launches reduced from a high of 784 in July 1997 to 160 in August 2014. Redondo Beach Marina

personnel indicate that the average maximum daily number of boats launched between 2012 and 2014 varied from only 12 to 14. There are approximately 67 existing double stalls (trailered parking) in the surface parking lot in the northern portion of the project site. The number of these trailered parking spaces are not based on any City demand requirement, but have been made available to service the boat hoists at the Redondo Beach Marina in Basin 3. These spaces are associated with the boat hoists and rarely filled with trailered vehicles. There is increased usage of the boat hoist parking during the few long holiday weekends (Memorial, Independence and Labor Day) and special events (paddle board races, fishing derby). The trailered parking also occasionally receives more use if there is a major fishing event (that may occur during a couple summer weeks), and at the lobster season opener (October). However, even during these events/holidays, the maximum number of boat hoists is typically 20 to 25 boats a day over the weekend, and thus a similar number of trailer parking spaces would be occupied. On an average peak season (May – October) weekend day, boat hoist parking would consist of 12 to 14 parking spaces occupied by vehicles with trailers. Two to three of the trailers may be parked overnight for extended boating trips. An average weekday in season there are two to five hoists per day. During the off-season those numbers drop in half, on average. Therefore, typically only a small portion of the 67 trailer parking spaces are occupied at any given time under existing conditions.

The number of trailered parking spaces under the proposed project is based on the reasonably foreseeable demand associated with the new boating facility under typical conditions. In addition, the boat launch facility would include parking adjacent to the ramp (unlike the existing conditions, where the parking is not adjacent but to the north of the hoists). The amount of proposed boat ramp parking for Mole C was based upon the California Boating and Waterway's guidelines for parking associated with a boat ramp, which discussed general guidance for a one-lane ramp with approximately 20 trailer parking spaces and two-lane ramp with approximately 40 trailer parking spaces. As mentioned above, any boat ramp in King Harbor would be small due to lack of available sites of any size larger than 1.5 acres with access to and from the water. It is noted that recreational users of the boat launch ramp facility are expected to be a variety of users, including fishermen, day boaters, jet skiers, etc., and a majority of the parking associated with the ramp facility is expected to experience daily turnover. Fishermen tend to go out early and come back early (noon to 2:00 p.m.), while those launching boats for day boaters and jet skiers tend to go out a later in the day and also return later than the fishermen. Furthermore, there are other big multi-lane boat ramps approximately 10 miles to the north and south of King Harbor with convenient freeway access that would continue to operate and service the South Bay area and demonstrate that actual parking demand per boat launch lane is substantially less than the California Boating and Waterway's guidelines.

One of the largest near the proposed boat launch facility is in Marina del Rey, which provides an eight (8) lane facility, and capable of launching boats larger than the proposed King Harbor facility, vehicles/trailers up to 50 feet in total length. Although the existing boat launch facility in Marina del Rey, which has a much larger recreational marina, easier freeway access, and a 225 oversized space parking lot devoted to the launch facility, less than 30 vessels a day on average are launched at the Marina del Rey launch ramp, which includes eight (8) lanes. This result in a demand of less than four trailered vehicles per lane per day, and translates to usually less than 10 percent of the parking lot being full.[18]

[18] E-mail correspondence from Carol Baker, Division Chief, Community & Marketing Services Division, Los Angler County Beaches and Harbors, to Stephen Proud, Director, Waterfront & Economic Development Department, April 27, 2016. The data associated with the Marina Parking facility was based upon parking entries; however, this parking data included two subsets of information "Global Pay Station Entries" and "MPI Staffed Entries." The MPI Staffed entries are not boat launches and are not indicative of boat launch trailered parking space demand, and instead are associated with staffing and film shoot activates (which can enter multiple times in one day). Consequently, trailered parking demand was based upon "Global Pay Station Entries."

In addition to the data received from the Los Angeles County Beaches and Harbors Department regarding use of the Marina del Rey facility, City staff received usage information from the operators of the Cabrillo Beach Public Boat Launch, a four-lane, 109 parking space facility that is approximately 15 miles south of Redondo Beach, within the community of San Pedro within the City of Los Angeles. According to the information collected by staff, the number of oversized vehicle parking spaces utilized at the Cabrillo Beach facility by vehicles/trailers in 2015 totaled 7,054. This represents an average usage of approximately 19 spaces per day, or less than 20 percent of the facility's capacity. This result in a demand of less than five (5) trailered vehicles per lane per day. While demand can fluctuate, including higher weekend usage, a typical Sunday at the Cabrillo Boat Launch Facility averages an occupancy rate of 29 percent, or less than 32 spaces, which equates to less than eight (8) vehicles per lane. As also discussed in Master Response #8, the City is also proposing visitor management, which may include a reservation system for peak days.

Based upon the average annual demand factors, the proposed project, which provides 40 spaces for a two lane facility (20 spaces per lane) would be sufficient to meet reasonably foreseeable typical demand. While usage can vary on holidays, such as the Fourth of July weekend, CEQA does not require a public agency to use these extreme conditions for the purposes of analysis. As discussed in greater detail in Master Response #6, Section 2 (Weekend Traffic), the LA County 2010 Congestion Management Program states that analysis should be conducted to "exclude holidays." See also *San Joaquin Raptor v. County of Merced* (2007) 149 Cal.App.4th 645, the EIR for a mining project did not to provide an additional traffic analysis assuming that trucks sometimes enter and leave the project site "unevenly over time"; *Huntington Beach Neighbors v. City of Huntington Beach* (2012 4th Dist. Case No. G045732) 2012 WL 5330887 [rejecting argument that Huntington Beach needed to base its traffic analysis upon "weekend traffic, particularly summer weekends, and special events."]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 614 [Rejecting argument that traffic analysis needed to assume super-capacity crowds which only occur 0.3 percent of the time].[19]

For informational purposes, the Marina del Rey 2015 launch statistics and changes in peaking characteristics throughout the year at Cabrillo are included as an appendix to the Final EIR (see Final EIR Chapter 3). Please refer to Master Response #8: Boat Ramp in King Harbor for additional information.

4. Parking Required for Proposed Project:

Comments were received regarding the amount of parking provided as part of the proposed project. In particular, comments were received regarding providing enough parking for the project - specifically comments were received as to how the number of parking stalls only increases by eight percent, while the amount of development increases by a greater amount. Comments were also received regarding the ability of shared parking to addresses parking needs, and a few commenters questioned parking assumptions for the Seaside Lagoon.

Utilizing the "Global Pay Station Entries" annual data from 2015 of 5,845 provides an average rate of 16.01 launches per day. While the Marina Del Rey is an eight-lane facility, boarding floats are only offered adjacent to six lanes.

[19] Even assuming extreme Fourth of July holiday parking conditions, the Cabrillo Beach counts indicate an occupancy of 53 percent, which results in an occupancy rate of less than 58 spaces, which results in a rate of less than 15 parking spaces per lane. The proposed project, which provides approximately 22 spaces per lane would be sufficient to meet this demand. Furthermore, as noted above, these rates would be considered conservative given that these other boat launch facilities have more convenient freeway access and can accommodate larger vessels up to 60 feet in length.

As detailed in Section 3.13, Traffic and Transportation of the Draft EIR, Redondo Beach Municipal Code (RBMC) Title 10, Chapter 5, Article 5. Parking Regulations (Section 10-5.1700 et seq) provides the City's parking regulations for parking in the coastal zone. Section 10-5.1706 delineates the minimum required off-street [emphasis added] parking spaces required for commercial, industrial, and other nonresidential uses. Off-street (on-site) associated with the approximate 523,939 square feet of mixed-land uses (approximately 304,058 square feet of net new development), as well as parking the land uses associated with the Monstad Pier, must occur within the project site. Therefore, to accommodate the development within the area associated with the project site, a new parking structure is being proposed, this allows the City to reduce the current 12-acre surface parking footprint, with four acres of parking structure lot area, thereby allowing the City to increase the useable lot area within the harbor.

Parking based solely on the RBMC individual parking standards, would result in a parking requirement that would serve to park all uses at peak parking demand simultaneously, an unrealistic scenario. This would create a situation similar to today with many hours of excess/vacant parking areas, thereby precluding other beneficial uses which could operate in the Harbor/Pier area. With the exception of a few long holiday weekends (Memorial, Independence and Labor Day) and special events (paddle board races, fishing derby), existing parking at the project site is generally over-parked (i.e., there is an excessive of spaces than needed to meet demand).

The Draft EIR parking analysis conservatively utilized RBMC parking rates to estimate demand; more specifically utilizing RBMC Section 10-5.1706, parking demand was projected to be 2,567 spaces (as shown on Table 3.13-22 in Section 3.13 of the Draft EIR.) Therefore, the Draft EIR disclosed a parking shortfall of 204 parking spaces and determined that a significant impact would occur without mitigation because the project would provide less parking than needed based on overly conservative demand assumptions. However, as discussed on Draft EIR page 3.13-66, although the Draft EIR used overly conservative parking assumptions, the Draft EIR also contemplated providing a shared parking analysis after certification of the EIR. The Draft EIR acknowledged that the RBMC parking regulations are highly conservative, and assumed that peak parking demand for all uses would occur simultaneously. Rather than preparing a shared parking analysis after certification of the Final EIR, it was prepared as part of the Final EIR.

The City's General Plan Circulation Element contains a useful overview of shared parking:

> The City of Redondo Beach presently permits consideration of shared parking. Encouraging shared supplies of parking helps to eliminate the high cost and wasted space of excessive off-street parking. [¶] The concept of shared parking recognizes that parking spaces can be used to serve two or more individual land uses without conflict or encroachment. This phenomenon has long been observed in central business districts, suburban commercial districts, and other areas where land uses are combined. Share parking is essentially the result of two conditions: [1] The parking accumulation of parked vehicles varies because the activity patterns of nearby land uses differ by hour, by day, and by season. [2] Relationships among land use activities in a mixed-use development result in people being attracted to two or more land uses on a single automobile trip. The industry standard for shared parking comes from the Urban Land Institute (ULI) and the International Council of Shopping Centers (ICSC). The peak parking demand ratios in the ULI-ICSC shared parking model come from the analysis of hundreds of locations across the United States.

As described below, the shared parking demand analysis, which uses the ULI and International Council of Shopping Centers (ICSC) shared parking model, determined that would be a peak demand for 2,147 spaces for the proposed project. Therefore, a minimum of 2,147 parking spaces would need to be

provided on-site to meet parking demand. The City believes that this methodology provides a more accurate calculation of demand for the Waterfront project in comparison to the Redondo Beach regulations. Therefore, based on the shared parking demand analysis, the project would not have a significant impact on parking.

Shared Parking Analysis Background

The shared parking analysis was performed using the model in Shared Parking, 2nd Edition (ULI/ICSC, 2005). Shared Parking, 2nd Edition describes shared parking as follows:

"Shared parking is defined as parking space that can be used to serve two or more individual land uses without conflict or encroachment. The opportunity to implement shared parking is the result of two conditions:

1. Variations in the peak accumulation of parked vehicles as the result of different activity patterns of adjacent or nearby land uses (by hour, by day, by season)

2. Relationships among land use activities that result in people's attraction to two or more land uses on a single auto trip to a given area or development"

Shared Parking Assumptions

The shared parking model utilizes a series of assumptions, in addition to the base ULI/ICSC data, to develop the parking demand model. This discussion explains the assumptions used in the analysis and describes the background documentation used for each of these factors.

Parking Ratio. The ULI/ICSC methodology requires that each land use select independent parking ratios; that is, the parking ratio for each land use if used independently. The base parking demand ratios were developed through an extensive research and documentation effort by ULI/ICSC; these base rates reflect a national average for individual categories of land uses, and account for each parking demand facet of the land use operation (e.g., guests and employees).

For the purposes of this analysis, the base rates were utilized for the Project for all land uses with the exception of the boat slips, which conservatively used the RMBC regulatory rates, as boat slips are not included as a land use option in the shared parking model.

The following are the base ULI/ICSC parking demand rates (weekday/weekend) used for the various components of this study, as mentioned above:

- Community Shopping Center – 3.60/4.00 spaces/thousand square feet (ksf)
- Fine/Casual Dining Restaurant – 18.00/20.00 spaces/ksf
- Quick Serve Restaurant (QSR) – 15.00/14.00 spaces/ksf
- Luxury Theater – 0.20/0.27 spaces/seat
- Hotel-Leisure – 1.15/1.18 spaces/room
  - Restaurant/Lounge – 10.00/10.00 spaces/ksf
  - Convention Space – 20.00/10.00 spaces/ksf
- Office – 3.59/0.36 spaces/ksf
- Boat Slips – 0.75/0.75 spaces/slip (per the RMBC)

It is worth noting that the base ULI/ICSC parking demand rates outlined above are roughly equivalent to the RMBC rates with the exception of the QSR land use, which is considerably higher than the corresponding RMBC rates due to the RMBC placement of the QSR land use within the shopping center category. For conservative purposes, the QSR shared parking demand was calculated based on the ULI/ICSC base rates for fast food.

The ULI/ICSC shared parking demand model default approach for restaurant uses is to calculate the restaurant parking demand based on total gross land area (GLA), which is not the case with the RBMC parking requirement calculation for restaurant space, as that calculation is based on seating area rather than total GLA. Based on conversations with the City of Redondo Beach, it was determined that the RMBC parking requirement calculation for restaurants inherently reflects the mode and captive market reductions allowed in the ULI/ICSC parking demand calculation. As such, the decision was made to calculate the restaurant shared parking demand based on seating area rather than GLA in order to be consistent with the RMBC parking requirement calculation. Due to this unit deviation, however, for conservative purposes no additional mode or captive market parking reduction factors were applied to the restaurant parking demand calculation, as those reductions are inherent in the RMBC parking requirement calculation.

Parking demand associated with parks and open space and use of the harbor waters, such as pier fisherman, passengers of whale watching and sport fishing commercial vessels, and including users of the Seaside Lagoon is accounted for in these calculations in an indirect manner; that is, the users of these recreational uses would be at the site using other or multiple land use options at the site. For example, a user of Seaside Lagoon is likely purchase a beverage, meal or snack from the QSR land use option, or shop retail (e.g., community shopping) at the site, and this users parking at the site is considered in the parking demand study associated with the 43,366 square feet of concession development (which includes fine/casual dining restaurants, QSR, and shopping as calculated above) located therein. Additionally, the parking demand rates are conservative enough such that there would be sufficient stalls available to accommodate users of the site that come to enjoy the recreational uses at the site and not the other mixed uses (on which the parking requirements are based). Additionally, as shown on Chart 3 below, parking demand is generally highest during the evening hours when recreational use is expected to be low. During the weekday and weekend morning hours (6:00 AM to 12:00 PM) and mid-afternoon hours (3:00 PM to 5:00 PM) the parking demand never exceeds 75 percent, which translates into approximately 103 to 1,928 spaces during the weekday morning hours or 557 to 2,000 during the weekend morning hours and 335 to 595 spaces during the weekday mid-afternoon hours or 534-719 spaces during the weekend mid-afternoon hours (see Table 2-5). Therefore, the proposed project would not represent a deterrent to recreational uses of the waterfront and there would be sufficient parking to meet the demand of these uses, including the recreational features available at the project site.

Time of Day. The time of day factor is one of the key assumptions of the shared parking model. This factor reveals the hourly parking pattern of the analyzed land use; essentially, the peak demands are indicated by this factor. ULI/ICSC's research efforts have yielded a comprehensive data set of time of day factors for multiple land uses. As the demand for each land use fluctuates over the course of the day, the ability to implement shared parking emerges.

Weekday vs. Weekend. Each shared parking analysis measured the parking demand on a weekday as well as on a Saturday. Research has indicated that a source for variation in parking demand can be traced to the difference between weekday and weekend demand.

Seasonal Variation. The shared parking analysis was based on the peak month of the year. The total parking demand of the project was compared over the course of the year; the peak month's demand is reported.

Mode Split and Captive Market. One factor that affects the overall parking demand at a particular development is the number of visitors and employees that arrive by automobile. It is common that mixed-use projects and districts have patrons/visitors captured within the site itself based on the mixed-use nature of the project. The mode split accounts for the number of visitors and employees that do not arrive by automobile (transit, walk, and other means) or are internally captured.

The project's mode split and internal capture ratios were adjusted accordingly based on the proximity of adjacent residential development and multi-modal facilities, and the complementary nature of the development.

Auto Occupancy. The project's shared parking analysis used the national averages for auto occupancy, i.e., the typical number of passengers in each vehicle parking at the site, for all land uses. No changes were made to the ULI/ICSC average rates.

The shared parking model applies these assumptions/inputs and considers each land use separately in order to identify the peak parking demands of each project component.

Proposed Project

Tables 2-5 and 2-6 detail the input assumptions and results of the project's shared parking analysis. For each land use, the tables show the base parking demand ratio for a weekday and a Saturday, the mode adjustment (mode split), the non-captive ratio (internal capture), and the peak hour and peak month adjustment ratios. While the City's parking demand analysis can be based upon typical parking conditions, this analysis took an overly conservative approach to demonstrate that there would be adequate parking even during the peak days of the year. As detailed in Tables 2-5 and 2-6, the shared parking model calculates the peak demand to occur at 7:00 PM on a December weekend, which is typically the busiest time of the year for commercial developments with large restaurant and retail components due to the impact of holiday season shopping activity.

Charts 1 and 2 illustrate the peak hour parking demand occurring during each month of the year for the weekday and weekend, respectively. As indicated in Charts 1 and 2, although the overall peak demand is expected to occur on a December weekend based on national parking demand averages, due to the coastal nature of the project, it is anticipated that the parking demand could approach equivalent levels for a few hours on busy days during the summer. Chart 3 illustrates the hourly parking demand pattern during the peak month of December, and Chart 4 illustrates the peak guest and employee parking demand by hour.

By component, the model estimates that the busiest hour of the year would experience a combined retail demand of 301 spaces, restaurant demand of 1,226 spaces, QSR demand of 411 spaces, luxury theater demand of 82 spaces, hotel demand of 82 spaces, office demand of zero spaces, and boat slip demand of 45 spaces. The peak parking demand totals 2,147 spaces**.** As such, a minimum of 2,147 parking spaces will be provided. The results of this analysis are summarized in Table 2-7.

Shared Parking Summary and Conclusions

As detailed by the shared parking analysis, the proposed parking supply would include a minimum of 2,147 parking spaces, which is sufficient to accommodate the peak parking demand of 2,147 spaces. As illustrated in Chart 4, the demand of 2,147 spaces would occur during busiest hour of the year, with a combined guest demand of 1,813 spaces and employee demand of 334 spaces.
Based on the results of the ULI/ICSC shared parking analysis, which was conservative in its approach, the project's estimated parking demand is significantly lower than the project's RBMC parking requirement. As such, the proposed parking demand of a minimum of 2,147 parking spaces is sufficient to accommodate both the guest and employee parking needs of the project.

Based on the further analysis using a methodology set forth by the ULI that better accounts for the parking demands of a mixed-use development, such as the proposed project, whereby the overall parking supply of a mixed-use development would be shared between complimentary uses (i.e., parking needed for retail uses could be shared with, and accommodated by, the parking supply allocated for office uses during off-business hours), the parking supply planned for the proposed project would be more than sufficient to meet the anticipated demands. More specifically, a shared parking analysis completed for the proposed project concluded that supply was more than sufficient for demand. Therefore, based on the shared parking analysis, which is considered to be more applicable to, and representative of, the proposed project's parking characteristics, the parking impacts of the project would be less than significant without mitigation. For additional clarification to the parking analysis in the Draft EIR, refer to Section 3.2.17, edits to Section 3.13 Traffic and Transportation, in Chapter 3 Modifications to the Draft EIR of this Final EIR.

Table 2-5: Proposed Project - ULI Shared Parking Demand Summary – Peak Month (December) and Peak Period (7:00 PM) - Weekend

Projected Parking Supply:	2147		Weekday					Weekend					Weekday			Weekend		
	Project Data																	
Land Use	Quantity	Unit	Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Peak Hr Adj 6 PM	Peak Mo Adj December	Estimated Parking Demand	Peak Hr Adj 7 PM	Peak Mo Adj December	Estimated Parking Demand
Community Shopping Center (<400 ksf)	123,910	sf GLA	2.90	0.80	1.00	2.32	/ksf GLA	3.20	0.80	1.00	2.56	/ksf GLA	0.80	1.00	230	0.75	1.00	238
Employee			0.70	0.80	1.00	0.56	/ksf GLA	0.80	0.80	1.00	0.64	/ksf GLA	0.95	1.00	66	0.80	1.00	63
Fine/Casual Dining Restaurant	64,000	sf GLA	15.25	1.00	1.00	15.25	/ksf GLA	17.00	1.00	1.00	17.00	/ksf GLA	0.95	1.00	927	0.95	1.00	1,034
Employee			2.75	1.00	1.00	2.75	/ksf GLA	3.00	1.00	1.00	3.00	/ksf GLA	1.00	1.00	176	1.00	1.00	192
Quick Serve Restaurant	45,000	sf GLA	12.75	0.80	1.00	10.20	/ksf GLA	12.00	0.80	1.00	9.60	/ksf GLA	0.85	1.00	390	0.80	1.00	346
Employee			2.25	0.80	1.00	1.80	/ksf GLA	2.00	0.80	1.00	1.60	/ksf GLA	0.90	1.00	73	0.90	1.00	65
Luxury Theater	700	seats	0.19	0.80	1.00	0.15	/seat	0.26	0.80	1.00	0.21	/seat	0.60	0.23	15	0.80	0.67	78
Employee			0.01	0.80	1.00	0.01	/seat	0.01	0.80	1.00	0.01	/seat	1.00	0.50	3	1.00	0.80	4
Hotel-Leisure	130	rooms	0.90	1.00	1.00	0.90	/rooms	1.00	1.00	1.00	1.00	/rooms	0.85	0.50	50	0.85	0.50	55
Restaurant/Lounge	900	sf GLA	10.00	1.00	1.00	10.00	/ksf GLA	10.00	1.00	1.00	10.00	/ksf GLA	0.55	1.00	5	0.60	1.00	5
Conference Ctr/Banquet (20 to 50 sq ft/gue		sf GLA	30.00	1.00	1.00	30.00	/ksf GLA	30.00	1.00	1.00	30.00	/ksf GLA	1.00	1.00	0	1.00	1.00	0
Convention Space (>50 sq ft/guest room)	6,600	sf GLA	20.00	1.00	1.00	20.00	/ksf GLA	10.00	1.00	1.00	10.00	/ksf GLA	0.50	0.60	40	0.30	0.60	12
Employee			0.25	0.80	1.00	0.20	/rooms	0.18	0.80	1.00	0.14	/rooms	0.40	1.00	11	0.55	1.00	10
Office 25 to 100 ksf	63,212	sf GLA	0.27	1.00	1.00	0.27	/ksf GLA	0.03	1.00	1.00	0.03	/ksf GLA	0.05	1.00	1	0.00	1.00	0
Employee			3.32	0.80	1.00	2.66	/ksf GLA	0.33	0.80	1.00	0.27	/ksf GLA	0.25	1.00	42	0.00	1.00	0
Boat Slips	60	units	0.75	1.00	1.00	0.75	/ksf GLA	0.75	1.00	1.00	0.75	/ksf GLA	1.00	1.00	45	1.00	1.00	45
Employee			0.00	1.00	1.00	0.00	/ksf GLA	0.00	1.00	1.00	0.00	/ksf GLA	1.00	1.00	0	1.00	1.00	0
													Customer		1703	Customer		1813
													Employee		371	Employee		334
													Reserved		0	Reserved		0
													Total		**2074**	Total		**2147**

Source: Gibson Transportation Consulting Inc., 2016

Notes:

The ULI/ICSC base rates were utilized for the project for all land uses with the exception of the boat slips, which used the RMBC rates, as boat slips are not included as a land use option in the ULI/ICSC shared parking model.

For the purposes of this analysis, the restaurant parking demand was calculated based on seating area rather than gross leasable area in order to be consistent with the RMBC parking requirement calculation.

Due to this unit deviation, no additional mode adjustments were taken for either restaurant guests or employees, as those adjustments are inherent in the RMBC parking ratio.

Table 2-6: Proposed Project - ULI Shared Parking Demand Summary – Hourly

December

Weekday Estimated Peak-Hour Parking Demand

Projected Parking Supply: 2147 Stalls	Monthly Adj.	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	Overall Pk 6 PM	AM Peak Hr 11 AM	PM Peak Hr 1 PM	Eve Peak Hr 6 PM	Footnote
Community Shopping Center (<400 ksf)	100%	2	11	34	69	126	172	207	230	230	230	218	195	230	215	187	144	86	29	-	230	172	230	230	-
Employee	100%	7	10	28	52	59	66	70	70	70	70	70	66	66	66	63	52	28	10	-	66	66	70	66	-
Fine/Casual Dining Restaurant	100%	-	-	-	-	146	390	732	732	634	390	488	732	927	976	976	976	927	732	244	927	390	732	927	-
Employee	100%	-	35	88	132	158	158	158	158	158	132	132	176	176	176	176	176	176	150	62	176	158	158	176	-
Quick Serve Restaurant	100%	18	37	73	110	202	312	367	367	331	220	202	220	390	367	230	138	92	46	23	390	312	367	390	-
Employee	100%	12	16	24	32	61	81	81	81	77	57	48	57	73	73	48	32	24	16	16	73	81	81	73	-
Luxury Theater Weekday	23%	-	-	-	-	-	-	4	9	11	11	11	12	15	20	24	24	20	16	10	15	-	9	15	-
Employee	50%	-	-	-	-	-	-	1	2	2	2	2	3	3	3	3	3	3	2	1	3	-	2	3	-
Hotel-Leisure	50%	56	56	53	47	41	41	38	38	41	41	44	47	50	50	53	56	56	59	59	50	41	38	50	-
Employee	100%	1	8	24	24	26	26	26	26	26	26	24	18	11	5	5	5	5	3	1	11	26	26	11	-
Office 25 to 100 ksf	100%	-	-	3	10	17	8	3	8	17	8	3	2	1	-	-	-	-	-	-	1	8	8	1	-
Employee	100%	5	50	126	160	168	168	151	151	168	168	151	84	42	17	12	5	2	-	-	42	168	151	42	-
TOTAL DEMAND	Customer	121	150	251	361	657	1,047	1,484	1,517	1,391	1,025	1,091	1,335	1,703	1,702	1,545	1,397	1,231	931	384	1,703	1,047	1,517	1,703	
	Employee	25	119	290	400	472	499	487	488	501	455	427	404	371	340	307	273	238	181	80	371	499	488	371	
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
		146	269	541	761	1,129	1,546	1,971	2,005	1,892	1,480	1,518	1,739	2,074	2,042	1,852	1,670	1,469	1,112	464	2,074	1,546	2,005	2,074	
Spaces Available (Overall Peak minus Hourly Peak)		1,928	1,805	1,533	1,313	945	528	103	69	182	594	556	335	-	32	222	404	605	962	1,610	2,074	1,546	2,005	2,074	

December

Weekend Estimated Peak-Hour Parking Demand

		6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	Overall Pk 7 PM	AM Peak Hr 11 AM	PM Peak Hr 1 PM	Eve Peak Hr 7 PM	Footnote
Community Shopping Center (<400 ksf)	100%	3	13	25	89	152	178	216	241	254	254	241	229	254	238	206	159	111	48	-	238	178	241	238	-
Employee	100%	8	12	32	59	67	75	79	79	79	79	79	75	67	63	59	51	36	12	-	63	75	79	63	-
Fine/Casual Dining Restaurant	100%	-	-	-	-	-	163	544	598	490	490	490	653	979	1,034	1,088	979	979	979	544	1,034	163	598	1,034	-
Employee	100%	-	38	58	115	144	144	144	144	144	144	144	192	192	192	192	192	192	163	96	192	144	144	192	-
Quick Serve Restaurant	100%	17	35	69	104	190	294	346	346	311	207	190	207	367	346	216	130	86	43	22	346	294	346	346	-
Employee	100%	11	14	22	29	54	72	72	72	68	50	43	50	65	65	43	29	22	14	14	65	72	72	65	-
Cineplex Weekend	67%	-	-	-	-	-	-	16	35	43	43	43	47	59	78	98	98	98	78	49	78	-	35	78	-
Employee	80%	-	-	-	-	-	-	2	3	3	3	3	4	4	4	4	4	4	3	2	4	-	3	4	-
Hotel-Leisure	50%	62	62	59	52	46	46	42	42	46	46	49	52	55	55	59	62	62	65	65	55	46	42	55	-
Employee	100%	1	6	17	17	18	18	18	18	18	18	17	14	11	10	10	10	8	8	6	10	18	18	10	-
Office 25 to 100 ksf	100%	-	-	1	2	2	2	2	2	1	1	-	-	-	-	-	-	-	-	-	-	2	2	-	-
Employee	100%	-	3	10	13	15	17	15	13	10	7	3	2	1	-	-	-	-	-	-	-	17	13	-	-
TOTAL DEMAND	Customer	127	156	222	333	476	768	1,260	1,358	1,233	1,127	1,099	1,276	1,784	1,813	1,730	1,483	1,386	1,262	728	1,813	768	1,358	1,813	
	Employee	20	73	139	233	298	326	330	329	322	301	289	337	340	334	308	286	262	200	118	334	326	329	334	
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
		147	229	361	566	774	1,094	1,590	1,687	1,555	1,428	1,388	1,613	2,124	2,147	2,038	1,769	1,648	1,462	846	2,147	1,094	1,687	2,147	
Spaces Available (Overall Peak minus Hourly Peak)		2,000	1,918	1,786	1,581	1,373	1,053	557	460	592	719	759	534	23	-	109	378	499	685	1,301	2,147	1,094	1,687	2,147	

Source: Gibson Transportation Consulting Inc., 2016

Table 2-7: Proposed Project - ULI Shared Parking Demand Summary – Peak Conditions

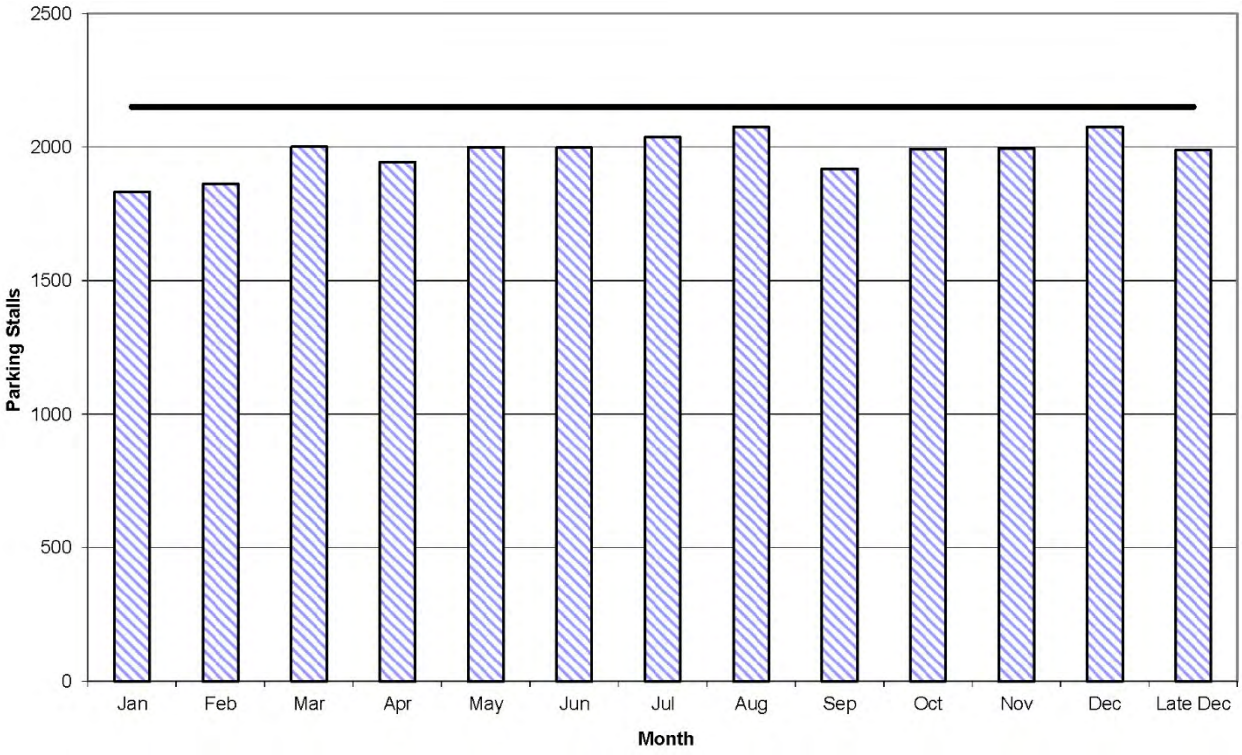
Proposed Land Use	Size	Parking Spaces Required
Community	123,910 sf	301
Restaurant	128,000 sf	1,226
QSR	45,000 sf	411
Luxury Theater	700 seats	82
Hotel [a]	130 rooms	82
Office	63,212 sf	0
Boat Slips	60 units	45
MINIMUM TOTAL PARKING SPACES REQUIRED		**2,147**

Source: Gibson Transportation Consulting Inc., 2016

Notes:

[a] Includes restaurant/lounge and convention space demand, as detailed in Table 2-6.

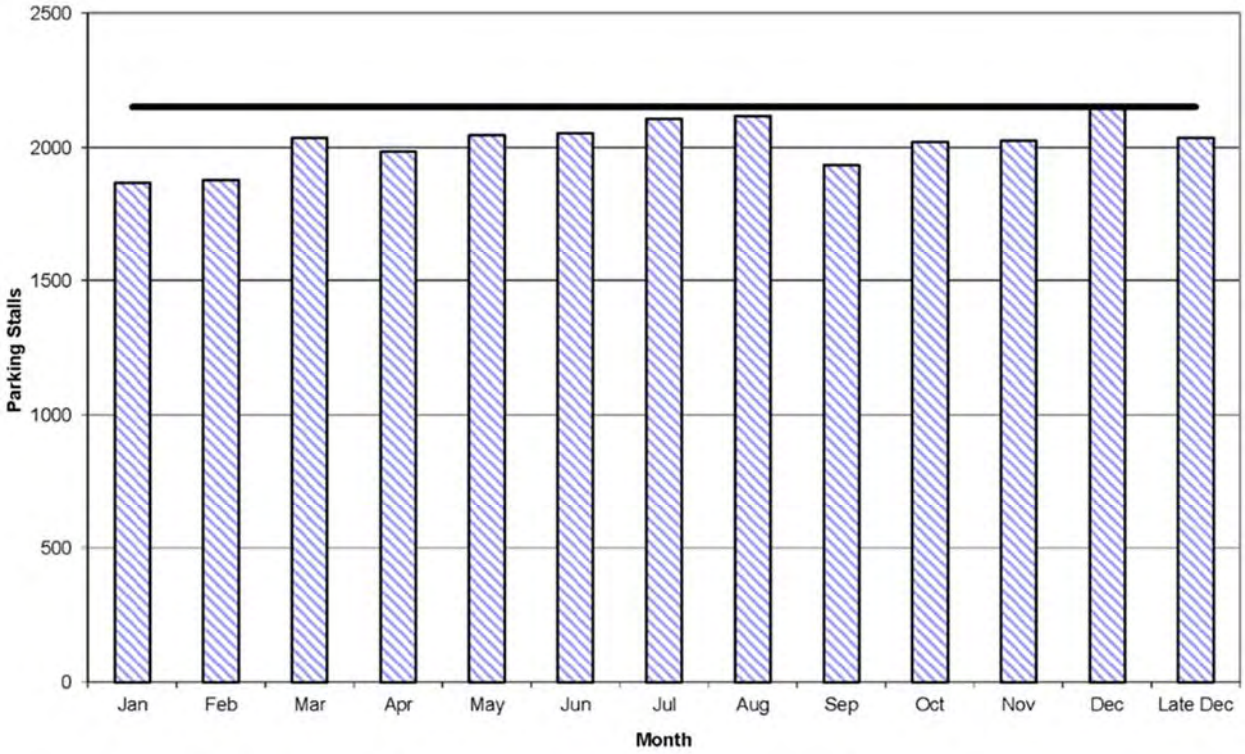
Chart 1
Weekday Month by Month Estimated Parking Demand



Solid line denote parking supply at 2,147 spaces

Source: Gibson Transportation Consulting Inc., 2016

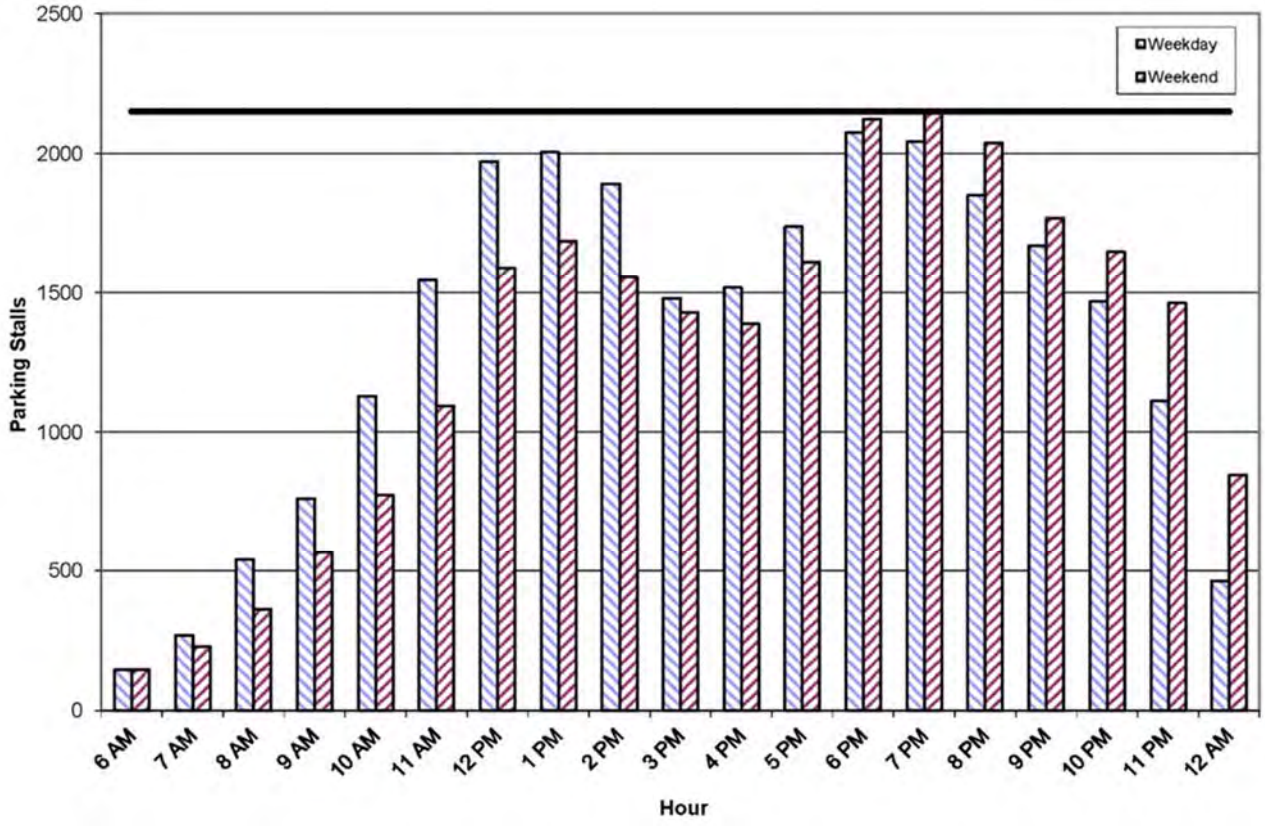
Chart 2
Weekend Month By Month Peak Hour Estimated Parking Demand



Solid line denote parking supply at 2,147 spaces

Source: Gibson Transportation Consulting Inc., 2016

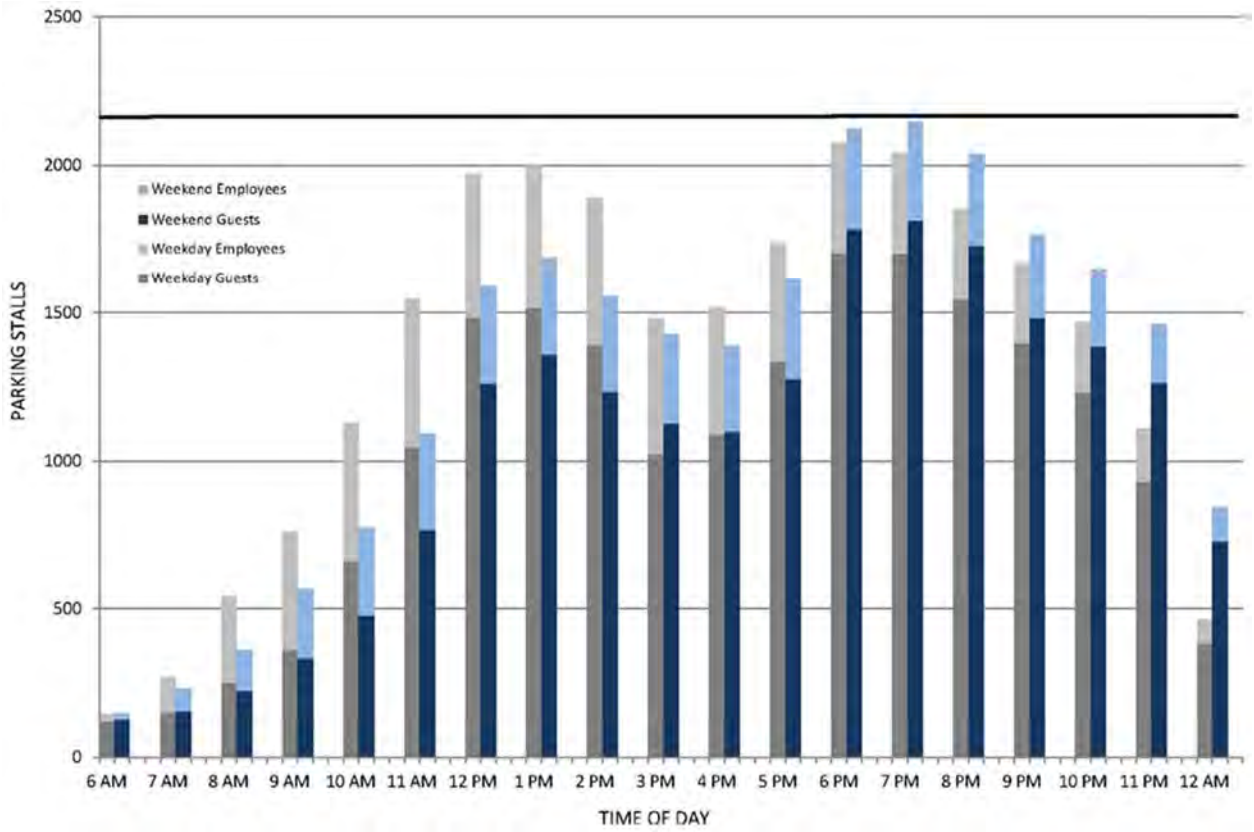
Chart 3
Peak Month Daily Parking Demand By Hour



Solid line denote parking supply at 2,147 spaces

Source: Gibson Transportation Consulting Inc., 2016

Chart 4
Peak Guest and Employee Parking Demand By Hour



Solid line denote parking supply at 2,147 spaces

Source: Gibson Transportation Consulting Inc., 2016

MASTER RESPONSE NO. #8: BOAT RAMP IN KING HARBOR

Several comment letters address the issues associated with placement of a boat ramp within King Harbor. Following is a detailed history of the study of placement of a boat ramp in King Harbor, the pros and cons of the sites studies, as well as a response associated with the concerns received by the public:

History

There is a long history of launch ramp siting at King Harbor, beginning in 1959, and continuing until today. Launch ramp siting has looked at locations at Moles A, B, C, and D, as well as within Basins 1, 2, and 3. No study found any standout optimum location or alternative because of many factors including, but not limited to lack of available development space, relatively deep water adjacent to mole shorelines, vehicle access, and lack of City control due to existing leases. Following is a brief summary of notable siting activity:

1959 - Harbor Master Plan included a ramp at Mole A - large launch ramp facility with space for approximately 350 trailers and up to four boat hoists

1960 – Harbor Lease Plan included a ramp at Mole D – 250 trailer spaces and a conventional ramp

1964 – A small ramp located near Mole D, which was later destroyed by storms (due to reduced outer breakwater height than currently exists)

1965 – Efforts were made to reach agreement to build a ramp at Port Royal in Basin 2 (this was unsuccessful)

1976-1979 – Hand launch installed outside of the Seaside Lagoon (current location)

1982 – California Coastal Commission (CCC) conditioned a launch ramp to be built on Mole B and required easement for public access

1983 – Feasibility study for a launch ramp facility at either Seaside Lagoon or Mole B parcels was determined not to be ideal. The study's findings removed CCC's condition for launch ramp development on Mole B, and instead Moonstone Park was established at the Mole B parcel

1988 – DMJM Siting study performed that analyzed in concept only (which assumed no obstructions with siting) a launch ramp facility at five sites: one lane ramp at Mole B, two lane ramp at Basin 2, two lane ramp at Seaside Lagoon, and two lane ramp at Basin 3. Harbor Commission recommended Seaside Lagoon and Mole B plans for final consideration; however, no action was ever taken because of opposition to both plans.

1991 – Harbormaster dock reconfiguration study reviewed moving boat hoist from Mole D to the south end of Mole B near the Harbor Patrol Headquarters building.

2003 – Joe's Crab Shack Plan: Various ramp and docking with breakwater extending from end of Portofino was considered by the City.

2006/2007 – Conceptual designs prepared for the south end of Mole D but access/circulation issues

2009 - The CCC approved an amendment to the City's Local Coastal Program (LCP) with suggested modifications. The CCC's modifications included the requirement that a public boat launch ramp be constructed in association with future development projects within the Harbor area.

2010 - The City Council approved the modifications made to the LCP by the CCC and the amendments were subsequently approved by the voters of Redondo Beach as part of Measure G.

2014 - Moffatt & Nichol report and State grant application prepared for a ramp at Joe's Crab Shack with breakwater (similar to facility under the proposed project). City Council on October 14, 2014, requested another boat ramp facility feasibility study of the harbor. The locations studied in the latest feasibility study (by Noble Consultants, Inc.) was the basis for the proposed project's small craft boat launch ramp facility, as well as alternative locations detailed under Alternative 8 in the Draft EIR.

In summary, many sites and plans have been studied for the last 55 years (between 1959 to 2014). Based on location (shelter from waves and surge), distance from vessel traffic lanes, and water use patterns in the harbor, the preferred sites for the boat launch facility would be in Basins 1 or 2. However, since 1963, Basins 1 and 2 have been built out and become unavailable for a ramp. Therefore, there is no ideal location within the harbor for the boat launch facility. Based on the existing harbor layout, the challenge of developing a suitable boat

launch facility is hindered by size and layout of the harbor, size of available locations, and City access to locations due to existing leases.

Current Feasibility Study and Siting Effort

As noted above, the City Council on October 14, 2014, requested another boat ramp facility feasibility study of the harbor. Noble Consultants, Inc. (Noble), was tasked with evaluating once again potential boat ramp facility locations within the harbor. The boat ramp facility feasibility study performed by Noble was focused on the various planning considerations at each Mole location within King Harbor and was not intended to serve as a CEQA analysis (i.e. the discussion is not based upon a comparison of existing conditions or the City's significance thresholds). Due to the size limitation based on the limited space available in King Harbor for a boat launch facility, all sites were reviewed for a one-lane boat ramp with 20 vehicle/trailer spaces and a two-lane boat ramp with up to 40 vehicle spaces. Following are the details from that reevaluation by location, recognizing that the design and layout of the boat ramp facilities, including parking, at each Mole location are at a conceptual level only and the exact specifications are subject to further refinement:

Mole A – This is an approximate 0.8- to 1.5-acre site. The three options associated with this location include: one-lane boat ramp with boarding float and approximately 20 head-in parking stalls (vehicle/trailer spaces); one-lane boat ramp with boarding float, hand launch ramp, and approximately 20 drive-through parking stalls (vehicle/trailer spaces); and, two-lane boat ramp with boarding float and approximately 40 parking stalls (vehicle/trailer spaces).

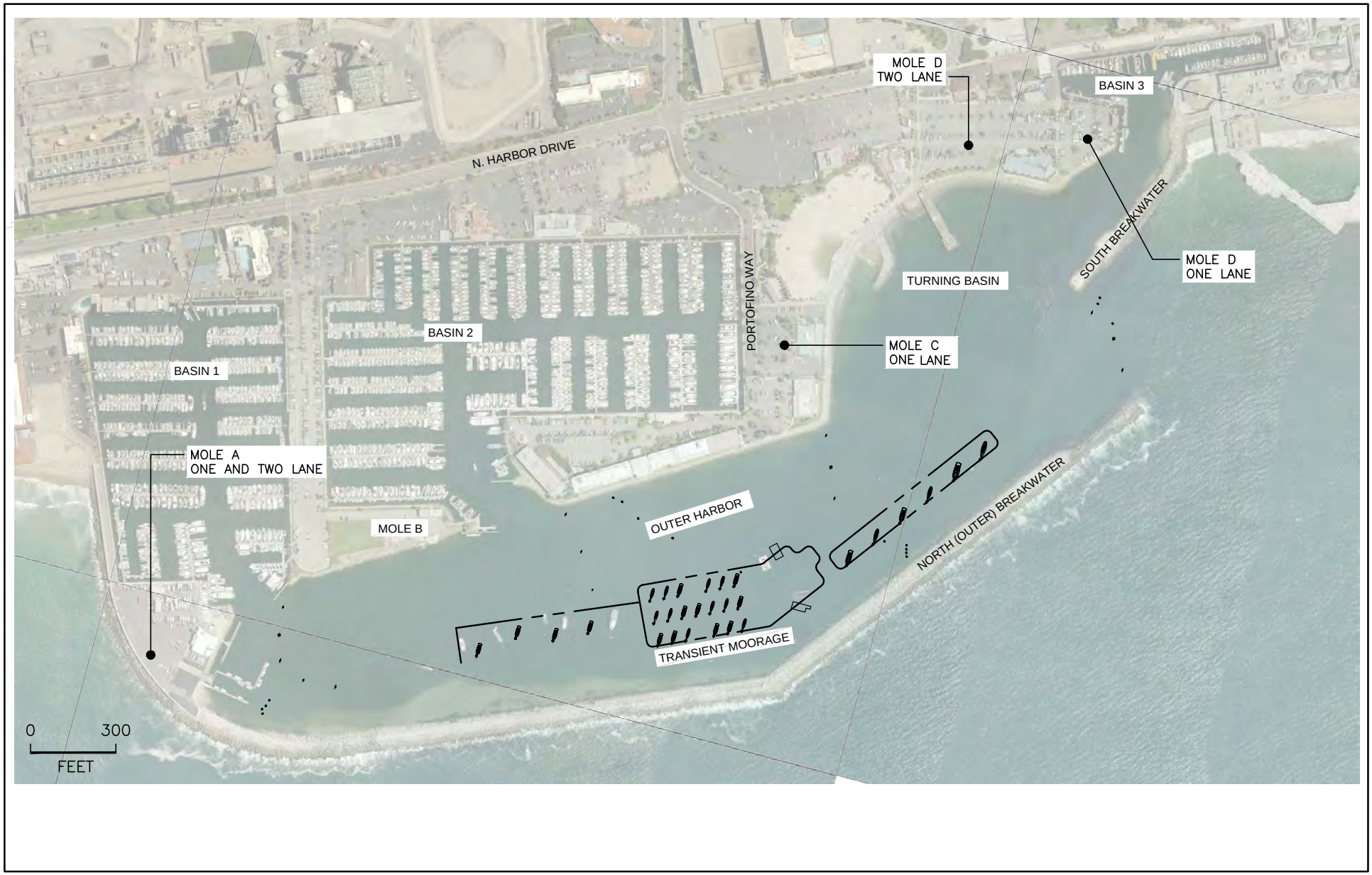
Mole B – This is an approximate 0.7- to 1.5-acre site. The two options associated with this location originally included: one-lane boat ramp with access through Basin 2, with boarding float and approximately 20 parking stalls (vehicle/trailer spaces), and two-lane boat ramp with access through Basin 2, with boarding float and approximately 40 parking stalls (vehicle/trailer spaces).

Mole C – This is an approximate 0.7- to 1.4-acre site. The two options associated with this location include: one-lane boat ramp with boarding float and approximately 22 parking stalls (vehicle/trailer spaces); and two-lane boat ramp with boarding floats and a breakwater and up to 40 drive-through vehicle/trailer stalls.

Mole D – This is an approximate 0.9- to 1.4-acre site. The two options associated with this location include: one-lane boat ramp with boarding float and approximately 21 parking stalls (vehicle/trailer spaces), and two-lane boat ramp with boarding float and approximately 39 parking stalls (vehicle/trailer spaces).

Attached are Final EIR Figures 2-1 through 2-10 for a map of the various ramps locations and the conceptual layouts associated with each site evaluated. With the exception of Final EIR Figures 2-4 and 2-5, Final EIR Figures 2-1 to 2-3 and 2-6 to 2-10 are also in the Draft EIR, Chapter 4, Analysis of Alternatives (Figure 4-4 and Figures 4-5a through 5f).

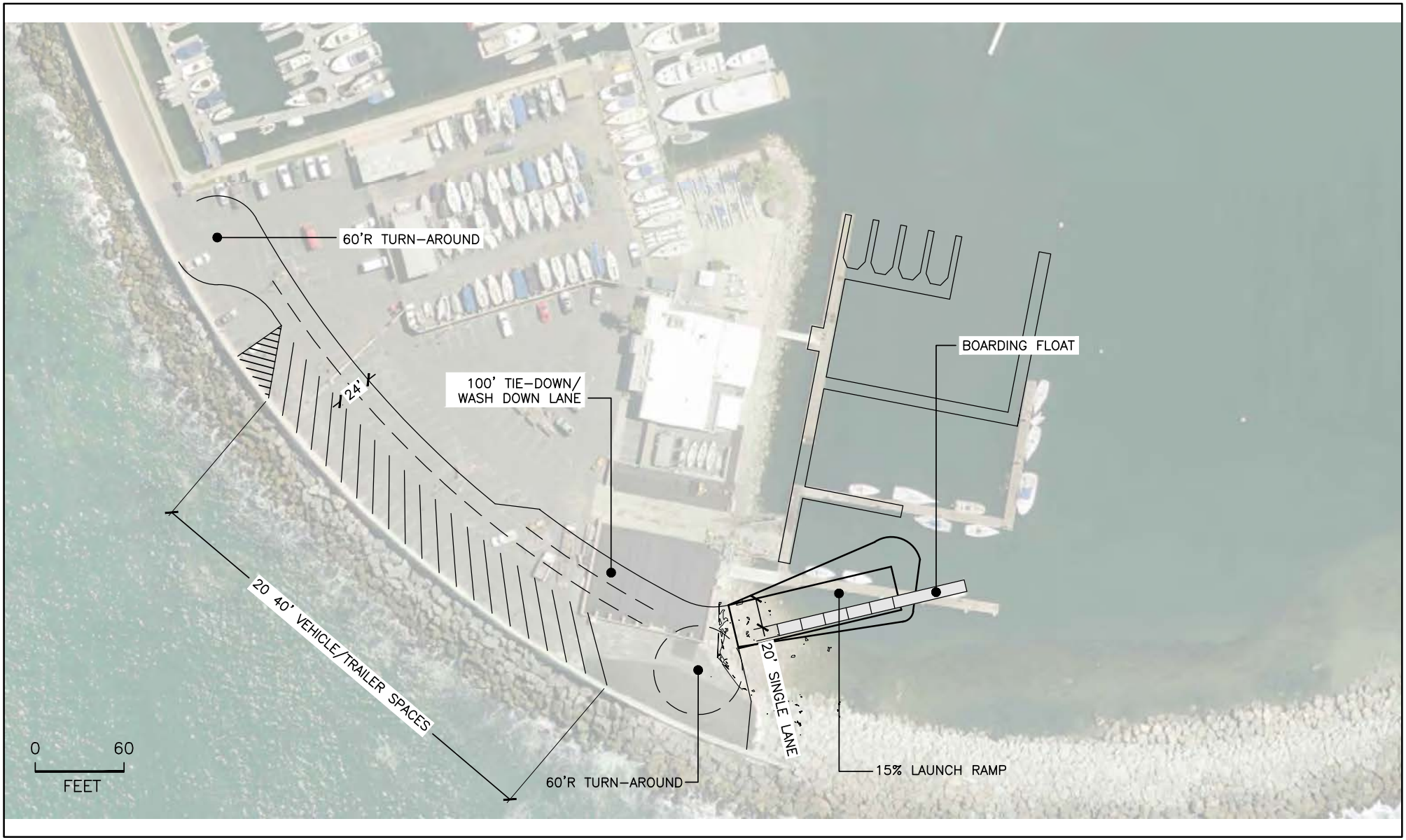
As with the previous studies, the recent evaluation determined that all the locations have challenges and competing interests and not one site stands out as a superior choice. Because of site limitations, various operational challenges, and possible ingress/egress concerns, whichever location or option is chosen (one- or two-lane), the City foresees a potential need for some form of visitor management, which may include a reservation system for peak days, the ability to close the site off should the facility be full or during inclement weather conditions, and on-site staffing to manage the facility.



Source: Noble Consultants, Inc., 2015

Figure 2-1

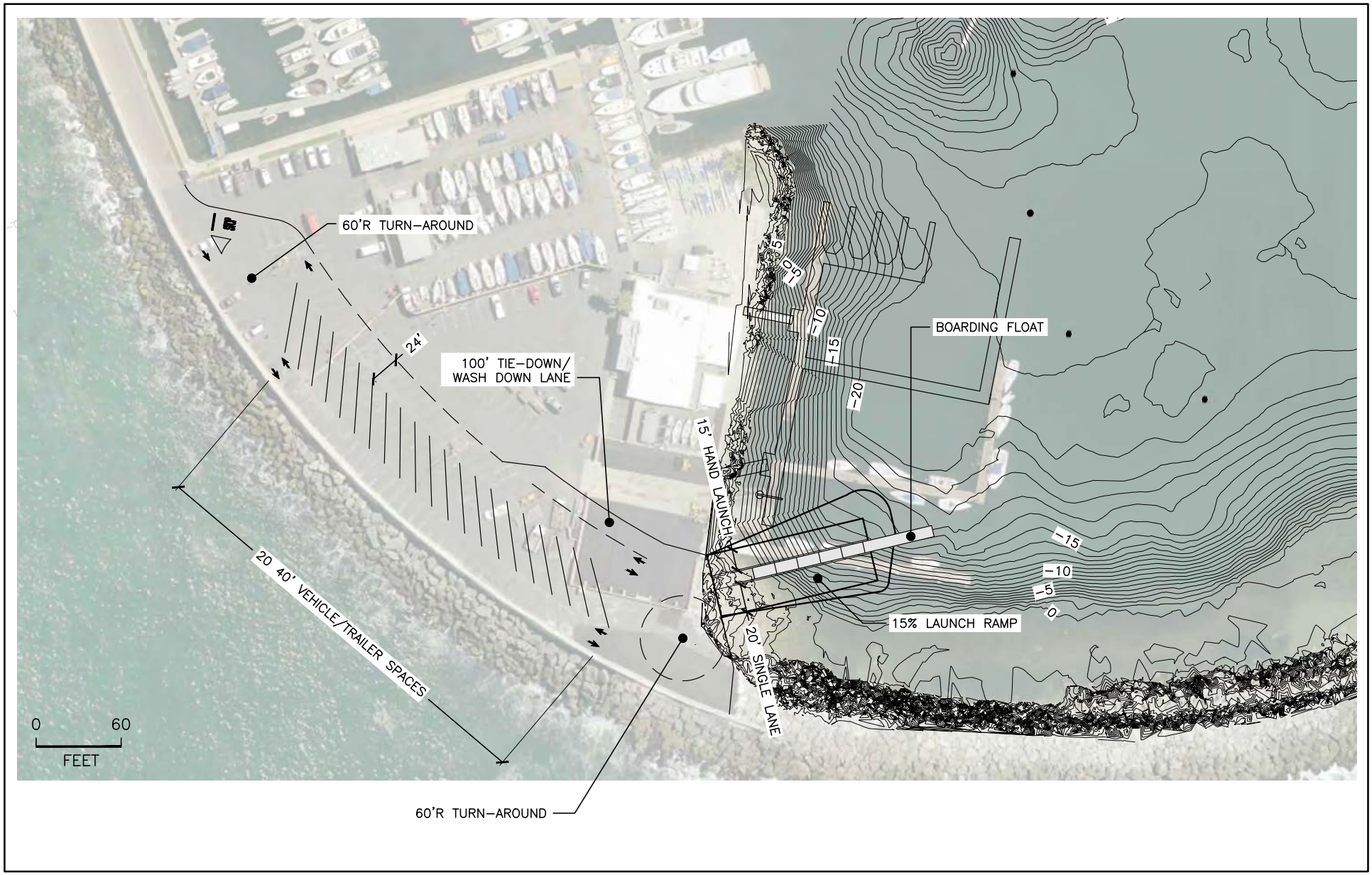
King Harbor Boat Launch Facility - Alternative Locations



Source: Noble Consultants, Inc., 2015

Figure 2-2

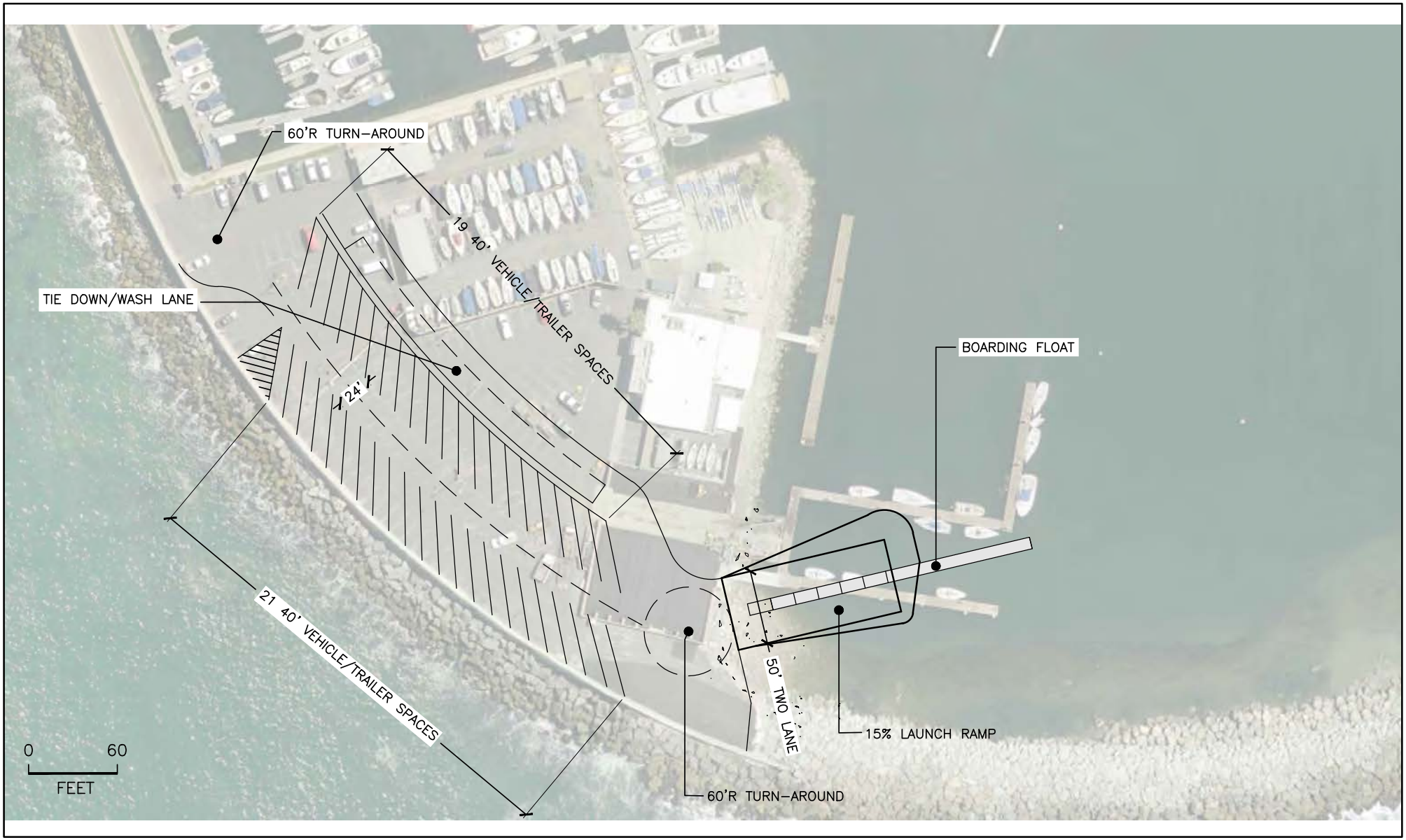
Conceptual Boat Launch Facility Plan - Mole A - One Lane



Source: Noble Consultants, Inc., 2015

Figure 2-3

Conceptual Boat Launch Facility Plan - Mole A - One-Lane with Hand Launch



Source: Noble Consultants, Inc., 2015

Figure 2-4

The Waterfront Final EIR

Conceptual Boat Launch Facility Plan - Mole A - Two Lane Ramp

Source: Noble Consultants, Inc., 2015

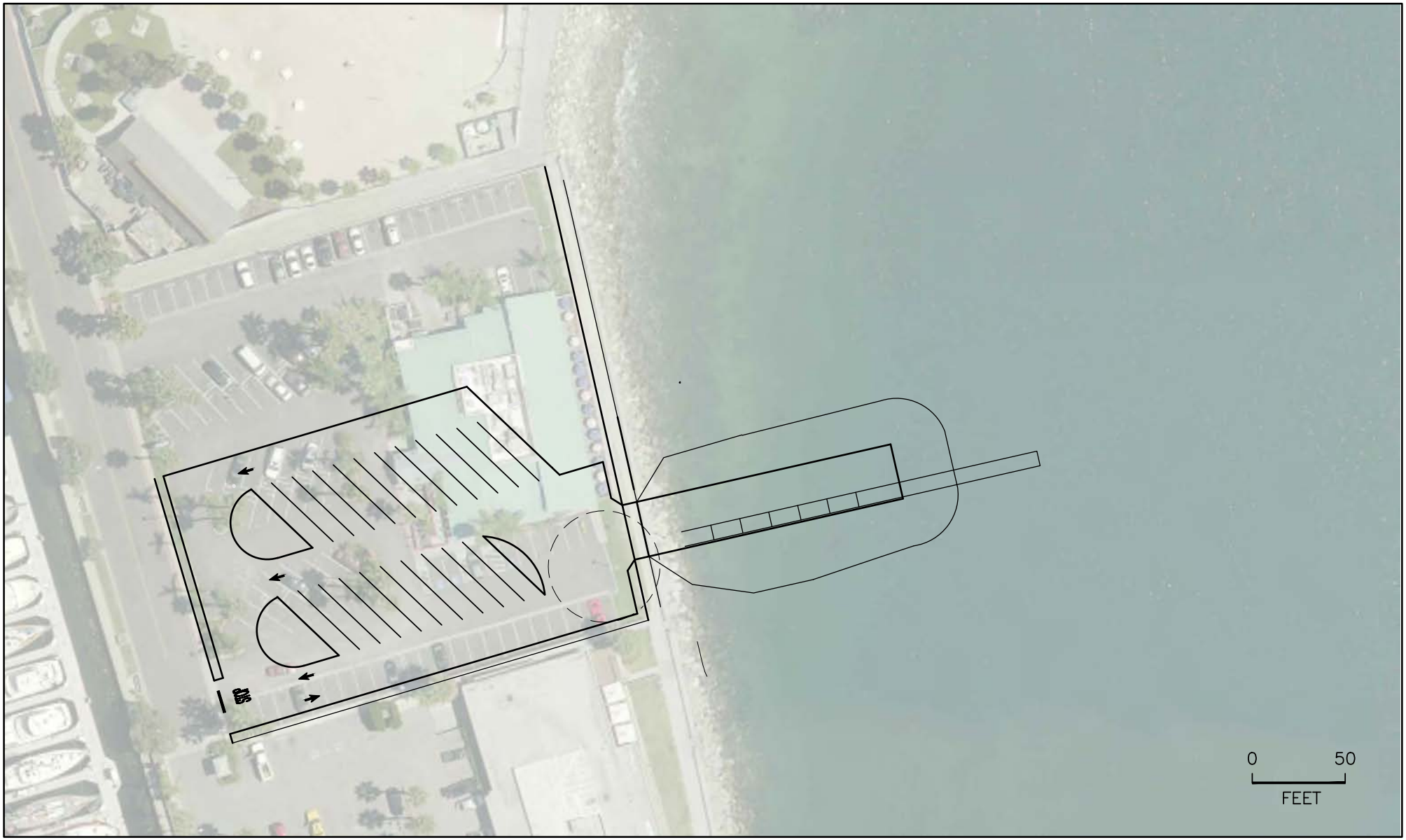
Figure 2-5

Conceptual Boat Launch Facility Plan - Mole B - One Lane

Source: Noble Consultants, Inc., 2015

Figure 2-6

Conceptual Boat Launch Facility Plan - Mole B - Two Lane



Source: Noble Consultants, Inc., 2015

Figure 2-7

Conceptual Boat Launch Facility Plan - Mole C - One Lane

Source: Noble Consultants, Inc., 2015

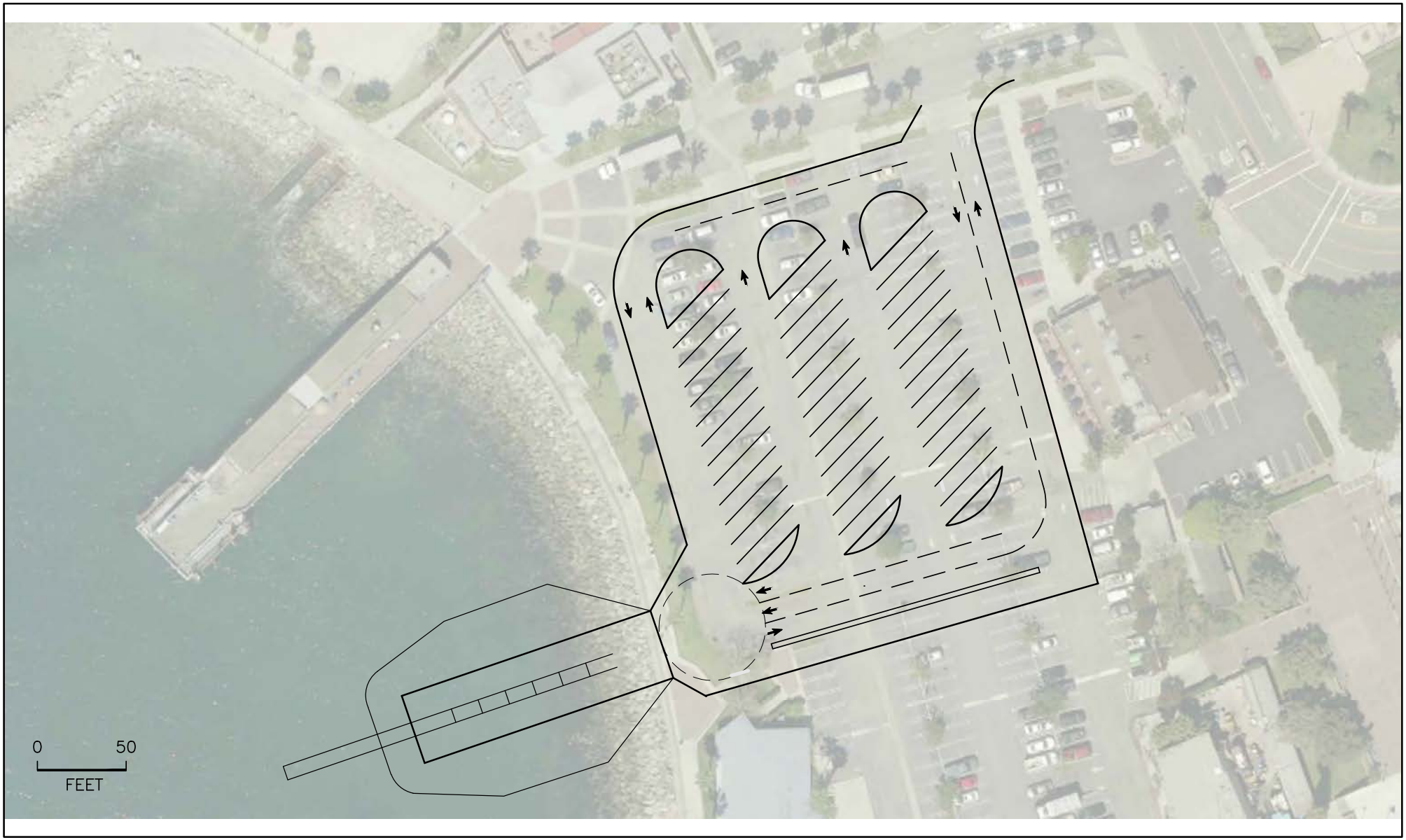
Figure 2-8

Conceptual Boat Launch Facility Plan - Mole C - Two Lane

Source: Noble Consultants, Inc., 2015

Figure 2-9

Conceptual Boat Launch Facility Plan - Mole D - One Lane



Source: Noble Consultants, Inc., 2015

Figure 2-10

Conceptual Boat Launch Facility Plan - Mole D - Two Lane

Concerns Raised by the Public During the Public Review of the Draft EIR

The proposed project analyzed a two-lane small craft boat launch ramp facility with a breakwater at Mole C (current location of Joe's Crab Shack restaurant). The Draft EIR also analyzed several different alternative locations for the boat ramp that were addressed in the 2014 boat ramp facility feasibility study, including three options at Mole A (one lane, two lane and a one lane with designated hand launch), a one-lane at Mole C with no breakwater, and two options (a one lane and a two lane) at Mole D. (Detailed in Draft EIR, Chapter 4, Analysis of Alternatives - Alternative 8.)

Several comment letters address the issues associated with a proposed boat ramp in King Harbor, including two broad subject matters: 1) safety; and, 2) boat ramp usage. The comments address both the proposed project boat ramp at Mole C and the alternative locations (such as Mole B) and configurations. Following is a detailed response associated with the concerns received by the public by each broad subject matter:

1. Safety

Several comments were received regarding safety related to the proposed boat ramp in King Harbor. Many of the comments focused on safe access to Mole A, as well as other safety concerns at Mole A (e.g., wave and surge), boating traffic, safety of one lane verses two lane ramp options, etc.. Comments on safety were also received relative to safety at Mole C (proposed project and one-lane alternative option). As an initial matter, the purpose of CEQA is to analyze the impacts of the proposed project on the surrounding environment, not to analyze the impacts of the existing environment on the proposed project or its future users or residents (or its components, such as the proposed boat launch facilities). (See *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392; *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.th 455 ["The Revised EIR Was Not Required to Discuss the Impact of Sea Level Rise on the Project."].) The following discussion summarizes the comments made, and provides responses.

Waterside and Landside Traffic:

- **Access to Mole A**

  Several comments ascertained that Yacht Club Way to Mole A is difficult to negotiate due to narrow width, several turns, as well as a guard gate and speed bumps, which make a vehicle/trailer length of 65 feet difficult to manipulate through the roadway. In addition, commenters were concerned that two vehicles would not be able to pass each other along Yacht Club Way.

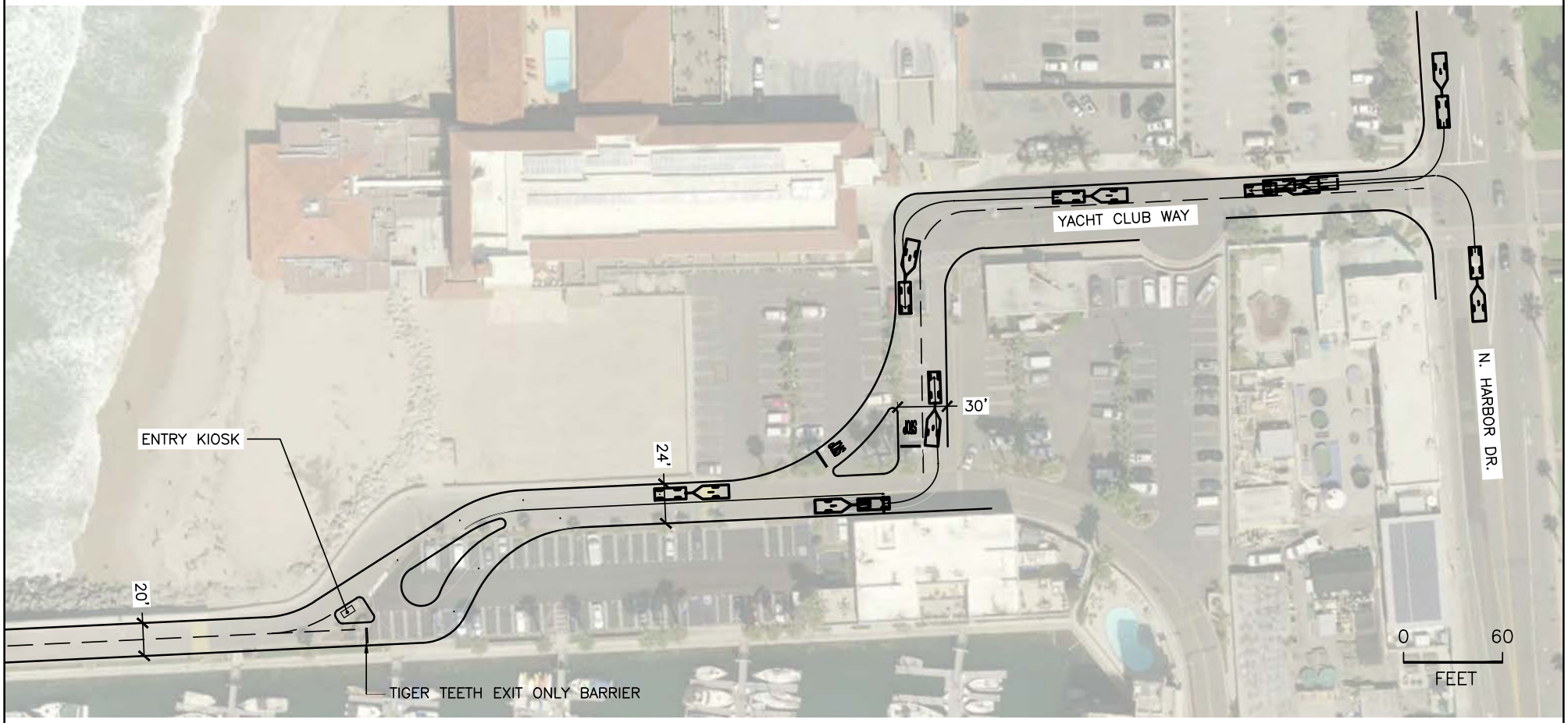
  The proposed boat ramp facility is intended for "small craft," which would normally include vehicles trailering a boat to be around 40 to 45 feet in length overall (and not 65 feet). The minimum design vehicle/trailer length per State of California boat launching facility design guidelines is 40 feet. The standard design vehicle/trailer per Oregon State Marine Board guidelines is a 19-foot long vehicle and 26-foot long boat/trailer for a total length of 45 feet. This vehicle/boat trailer length combination is considered to be longer than average. Vehicle width is 7 to just over 8 feet. Width of the boat is about 8 feet. As occurs under existing conditions, vehicle/trailer combinations of 50 feet long would need to use existing Marina del Rey or Cabrillo launch facilities. A vehicle/trailer length of 65 feet is difficult to tow; in fact, vehicle/trailer lengths of up to 60 feet may be considered a maximum practical length for a public boat launch facility.

  The narrowest portion of Yacht Club Way is about 20 feet wide under existing conditions. The standard parking stall width for vehicle/boat trailer parking stalls is 10 feet. Although

not ideal, under existing conditions utilizing safe and slow speeds, the two vehicles with trailers can safely pass one another. This is no different from how one might have to negotiate driving through a parking lot at times. In addition, the Mole A location alternatives have been refined to include a kiosk just before where the road narrows as a means to control access, as well as assist in queuing and/or processing reservations, as necessary, and/or limiting access during inclement weather. These refinements to the Mole A alternatives include widening the approach roadway to at least 24 feet. As part of the City's ongoing outreach regarding a King Harbor boat launch ramp facility, the City considered a slightly modified iteration of a Mole A access road concept that looked at accessibility, widths, and turning radii was developed by a traffic engineer (see attached Final EIR Figure 2-11). Further iterations of the Mole A option include the possible reconfiguration of the existing Yacht Club Way to reduce the curves and widen the access roadway, as shown on Final EIR Figure 2-11. It would provide a vehicle lane for vehicles that are accessing the King Harbor Marina (docks G, H, I, and J) and Yacht Club parking lot for queued vehicles associated with the ramp. Approximately 14 parking spaces at the western end of the parking lot for docks G, H, I and J, and six parking spaces in the lot immediately south of the apartments/Chart House restaurant would be removed in association with the widening. The existing parking in the area of the widening would be reconfigured (e.g., restriped) to reduce the number of spaces being eliminated.

Other comments received regarding Mole A access asserted that for vehicles with trailers, turning from Harbor Drive onto Yacht Club Way would be difficult and unsafe, including allegations that: (1) there is no straight line of access as vehicles must jog from Anita/Herondo onto Hermosa Avenue/Harbor Drive, or turn right onto Harbor Drive from Beryl Street, then turn onto Yacht Club Way; (2) turning right onto Harbor Drive from westbound Beryl Street while towing a larger trailered boat may not be physically possible; (3) turning right onto Harbor Drive when departing Yacht Club Way would be difficult; (4) the back-ups on Yacht Club Way at Harbor Drive are terrible and frequent; (5) dedicated bicycle lanes along Harbor Drive also make a dangerous condition for interactions between vehicle with trailers and bicyclists; and (6) bikers, walkers, skateboarders and surfers gather and stand on the road near the beach area and apartments, which creates a one lane choke-point.

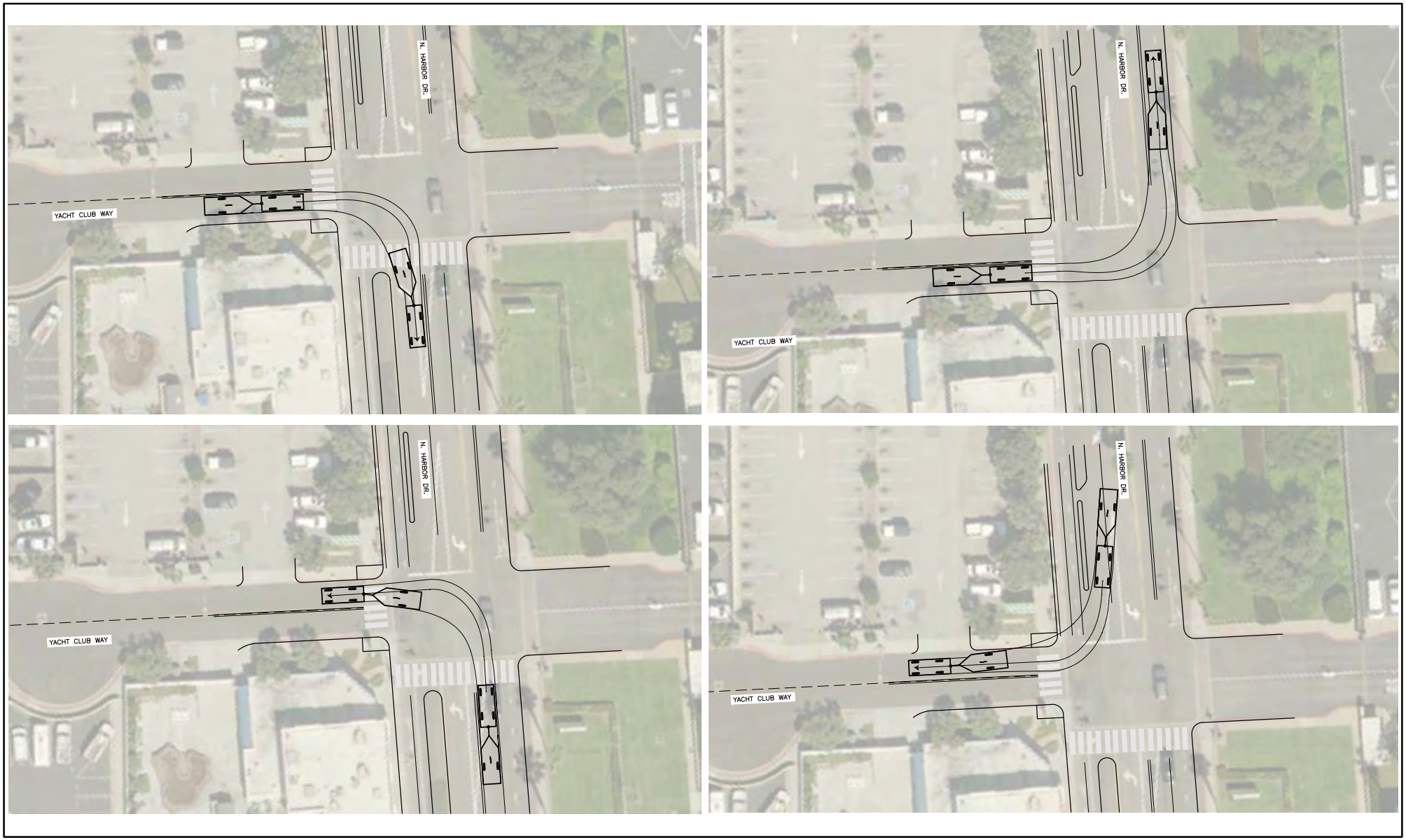
This road has been utilized by the existing Yacht Club for over 50 years. The existing conditions at Harbor Drive and Yacht Club Way include a designated left-turn lane from northbound Harbor Drive into Yacht Club Way. In addition, space for right-turns from southbound Harbor Drive into Yacht Club Way exists. Although tight, there is enough of a turning radius onto Yacht Club Way from Harbor Drive for a 40-foot vehicle with a trailer to negotiate. See Final EIR Figure 2-12 for a sketch of a conservative turning template that indicates that a 40-foot long vehicle/trailer can negotiate the turn from either direction on Harbor Drive. The 45-foot vehicle/trailer combination will encroach slightly over the flat curb ramp when making a right-turn onto Yacht Club Way from Harbor Drive. In addition, cars are not allowed to make a left-turn on a red signal in any direction; therefore, safe interaction between vehicles and bicyclist is maintained. As the peak use of the boat ramp is expected to occur early morning (around 6:00 am) and early afternoon (between 2:00 to 4:30 pm), which would not be expected to coincide with peak traffic on Harbor Drive, as well nonpeak beach, apartment or restaurant uses.



Source: Noble Consultants, Inc., 2016

Figure 2-11

Mole A Boat Launch Facility - Access Road Improvement Concept



Source: NCI, 2016
Note: For discussion purposes only.

Figure 2-12
Yacht Club Way Access

In addition, comments indicted that the parking and trailer parking and turning radius at Mole A would be limited and difficult. All the Alternative 8 options include 60-foot radius roundabouts to provide adequate queuing space for vehicles with trailers waiting to be launched. For the Mole A options, Figures 4-5a through 4-5c in Chapter 4, Analysis of Alternatives of the Draft EIR, shows the proposed 60 foot radius roundabout at each end of the proposed Mole A facility. The City's management of the site may include a kiosk, as well as designated queuing lanes. The staff at the kiosk would manage congestion along the roadway, and the designated queuing lanes and the roundabouts would provide adequate queuing space for vehicles with trailers waiting to be launched so as not to block the access to other facilities (such as the marina and Yacht Club).

- **Safety of one vs two lane**
  Several commenters felt that a two-lane boat ramp could handle boating traffic more safely than a single-lane. The reason given was that fishermen tend to leave at the same time early in the morning and return at the same time later in the day (according to tide movements) and having a single lane launch ramp would result in slower launches and cause boats to stack up waiting to come in. These comments alleged this would cause a crowded harbor with many boats waiting, which would negatively affect safety for all traffic in the harbor.

  Whether a one-lane or two-lane ramp is chosen, although it is likely that the peak use of the boat ramp would occur in the early morning (around 6:00 am), returning of boats is expected to occur over a longer period of time depending on the boaters planned activity. The layout of a one-lane facility would be for approximately 20 vehicles with trailered boats at one time, with a two-lane ramp of up to 40 vehicles with trailered boats at one time. Whichever location is chosen for the boat launch ramp facility in King Harbor, based on the boat hoist use and the use of other nearby ramp facilities (the nearest being the eight-lane public launch ramp facility in Marina del Rey approximately 12 miles north of the project site), it is anticipated that an adequate amount of parking at the facility can be provided to meet regular daily demand. (See the discussion in Section 2. Boat Ramp Usage below, regarding the estimated demand associated with boat ramp users). As for a backup of boats returning that could affect traffic in the harbor, although it is unlikely that a large number of boats would pick the exact time to return to the ramp, whichever location is chosen boaters would need to wait near the facility and remain aware of other harbor traffic (as they must do today when traveling in the harbor and waiting to use the existing boat hoists), or could use the temporary mooring locations along the north (outer) breakwater, if necessary. It should be noted that whichever boat ramp (one- or two-lane) is chosen, the ability to quickly and efficiently launch or bring back in small craft at the ramp would be better than the existing boat hoist system at the Redondo Beach Marina/Basin 3, because the hoists require assistance from the marina office/hoist operator, and thus can experience longer wait times.

- **Boating Traffic/Safety**
  Several comments were received that asserted that a boat ramp at Mole A would cause boating traffic and waterside safety issues, alleging that: 30 – 40 percent of the boat traffic in the harbor passes by Mole A. Mole A is located the furthest (out of all of the Moles) from the opening of the harbor to the ocean. Consequently, the majority of activity in the harbor occurs closer to facilities shared by all the harbor basins (e.g., the entrances to King Harbor Marina, Port Royal Marina, Portofino Marina and the turning basin, the outriggers, and the transient moorings, as well as sailing lessons and stand-up paddlers [SUPs]).

The Mole A location is located closest to the entrance of Basin 1, which has berthing for approximately 500 small craft (that are almost evenly divided between sail and power boats), which constitutes approximately 36 percent of the total for King Harbor. Although the boat ramp would be available throughout the day for launching small craft for various water recreation (such as fishing and jet skiing), it is expected that the peak use of the ramp for outgoing boats would be early in the morning (around 6:00 am). This is expected to be outside of the period of busiest use of the harbor (i.e., when sailing lessons, peak SUP, kayak, outrigger, etc. use is occurring). It would be expected that of the 10 percent of boats (or 140 boats) would leave the marinas on a busy day, and thus, even during the expected peak of boat ramp users returning to the facility (between noon and 2:00 pm for fishermen and 2:00 to 4:30 pm for other boating users), it is not expected that substantial conflicts with other boaters would occur. In addition, there would be sufficient space in the channel for boaters and other types of recreational watercraft. As also outlined in Draft EIR Table 3.13-8, the harbor has operated safely with a greater levels of boat traffic. (See also Section 3.13.2.4.3 for discussion of the harbor's channel capacity.) Furthermore, it is not reasonable to expect all of the vessels in the marinas to leave or return at once, the 20 or 40 boats associated with the peak boat ramp use would also not leave or return all at once. The addition of 20 or 40 boats associated with the boat ramp through the day would be a small increase in the overall amount of vessel traffic within the harbor, and as such would not be expected to create new use conflicts between the various users of the harbor. Depending upon the skill of the boater, launches would occur at a rate that is expected to vary between one every 5 to 15 minutes. This launch rate would introduce boat traffic into the Main Channel at a nominal increase and regulate safe separation distance between other vessels navigating the outbound channel lane. The location of the Mole A ramp provides good site distances down the Basin 1 entrance channel, as well as the upper reach of the Main Channel that will allow boaters to estimate who has right-of-way and when to safely enter the outbound channel. Inbound traffic will likely navigate at a heading toward the ramp on final approach, which will allow for sufficient offset distance from the exit to Basin 1 and its outbound traffic that might be departing later in the day. It should be noted that the ramp will be introducing boat traffic at a trickle rate.

There would be limited interaction between the boat ramp users and existing harbor uses; therefore, the boat ramp would be safely operated at Mole A and would allow for the continued use of the harbor without infringement of activities associated with the marinas.

As for safe maneuvering and navigation of the boat ramp users at the Mole A site with youth sailing, the Yacht Club, SUP craft from Tarsan launch, and outrigger traffic off of Mole B as it exists today, in addition to varying times and numbers of boat ramp uses during any one time, there are navigational signage, aids, and rules for the safe use of the harbor by multiple users. In addition, sailing classes could move further down the mooring area to avoid ramp boaters. Most boat ramp launches may be done before sailing classes commence. Weekday traffic would be very low. The use of Mole A as a boat ramp facility could co-exist and not infringe upon existing boating activities or reduce safety in the proximity of Mole A and the channel. Hand launch (SUPs), small craft and vessel activity coming out of Basin 1 would be at a 90-degree angle with the proposed ramp at Mole A. This area is wide enough and has clear line of sight for both the ramp and other channel users to see and have space and time to maneuver. In addition, once the vessels/SUPs have entered into the channel, they would be parallel to the ramp users and the breakwater, which is safer that the proposed project ramp at Mole C, where the placement of the breakwater at the ramp and the lagoon directs boaters and SUPs toward each other. Speeds in the area of the Mole A ramp location and Basin 1 entrance are also low, which adds to boat/water traffic safety. Additionally, the Mole A location is within the sight of

the Harbor Patrol facility. It is expected that interaction with rogue SUPs and other rules-of-the –road violators would continue to be managed and enforced by Harbor Patrol as they do on a regular basis and the more "busy" days of harbor use.

In addition, there would be less conflict with other King Harbor boat traffic and uses at Mole A because the ramp is at the head of the harbor where traffic patterns are set. Basin 1 traffic navigates directly to the head of the Main Channel. So would Mole A traffic. Other locations in King Harbor have potentially more opportunities for cross traffic conflict as boats enter from Basin 2, SUPs maneuver from Basin 3 or Basin 2.

Wave and Surge Exposure:

Several commenter's had concerns that a boat ramp at the Mole A site next to the north (outer) breakwater was not a good idea and have asserted: (1) the area is subject to wave action during the winter where waves are breaking over the breakwater (which is why King Harbor Yacht Club removes its docks from the water during the winter months of December to March) and experiences occasional flooding; (2) large waves can show up unannounced at this location; (3) the site would require a proactive replacement schedule (planning ahead) and diligent maintenance regiment to maintain safe usability; and (4) opening Mole A to more public access increases the risks for property damage and personal injury lawsuits because of the location (potential wave damage and increased access to breakwater).

Despite the warning signs, there have been incidences (rescues and in rare incidences fatalities) associated with individuals illegally walking on the breakwater along Mole A. These individuals have not been users of the Yacht Club or adjacent marinas, but random pedestrians that have illegally accessed by foot the area near and on the breakwater. While this occasionally occurs under existing conditions, a boat ramp facility at Mole A would not exacerbate the issue. If the Mole A site is chosen for the proposed boat ramp in King Harbor, the City would have a greater presence on the Mole and an improved ability to regulate on-site activities and monitor the breakwater. As noted above, the Mole A options have been refined to expressly include a kiosk, which would allow temporary closure of the facility during non-operating hours and during inclement weather. The City, in particular the Harbor Patrol, has the experience and knowledge to manage the risks that are inherent on Mole A. This may make the Mole A location safer than it is today. In addition, as noted verbally by several Yacht Club members at the boat ramp public meetings, and evident by the continued waterside activities adjacent to Mole A (such as continued boating from Basin 1 and Yacht Club sail boat classes, etc.) during breakwater wave and surge activity, safe operation of the boat ramp at Mole A is possible during those conditions. Should Mole A be chosen as the boat ramp location, when high wave and surge conditions occur, the boat ramp would be closed if deemed unsafe by the City (through on-site management of conditions and using existing three-day weather forecast and warning information, which provides ample time to plan for any necessary closures). However, with the exception of individuals who stand on or adjacent to the breakwater, even when waves do break over the breakwater, conditions are not inherently unsafe for individual boaters and pedestrian within the harbor, and typically result in a momentary downpour of water on the breakwater itself and a brief in-harbor swell of one to two feet. Conditions that would cause the closure of the boat ramp are not expected to occur over a long period of time (not all winter), but a couple of times a year, if at all, as wave overtopping events don't necessarily occur every year. Wave overtopping that could cause damage to harbor facilities can be experienced once every two or three years, and big swells might happen once every three to five years.

A couple commenters asked if boat launch ramp is closed during bad weather, what happens if boats need to get back. Marine forecasting is advanced to a point now that predictions of heavy seas can be

made at least three days prior. It is expected that the City would obtain advance warning from a professional marine weather and wave forecast service and commence ramp closure plans well before unwary boaters come to launch. As is currently the case, boaters having boating troubles can contact the US Coast Guard or, if associated with King Harbor, contact Harbor Patrol for assistance. As part of the operation of the boat ramp facility, the City would determine how long one could park a trailer in the lot with prior approval (e.g., such as overnight if someone went to Catalina for the weekend). It is anticipated that extended parking (three days or longer) would be prohibited at the ramp parking lot in order to keep the parking lot available to as many members of the public as possible.

The proposed breakwater at Mole C under the proposed project would protect the boarding floats from storm damage. If one of the alternative locations is chosen for the proposed boat ramp (i.e., no breakwater is constructed, as currently proposed under Mole C under the proposed project), safe operation of the boat ramp facility would still occur; however, because of the exposure to surge motion and occasional wave overtopping events, additional boarding float maintenance would be required.

The Mole A options under Alternative 8 in the Draft EIR notes on page 4-301, that "[t]he existing [King Harbor Yacht Club] facilities would be reconfigured to accommodate any of the Mole A boat launch ramp facility options" and consequently did not require the relocation of the Yacht Club to Mole B. An "EIR need not consider every conceivable alternative to a project." (CEQA Guidelines Section 15126.6(a).)

Mole C:

Comments were received regarding the safety associated with proximity to the proposed boat ramp and use of the facility by SUPs and swimmers using Seaside Lagoon. Impact TRA-3, starting on page 3.13-80, in Section 3.13, Traffic and Transportation of the Draft EIR, analyzes the potential for the proposed project to increase hazards due to design or incompatible uses. Specifically, the operation of the proposed small craft boat launch facility at Mole C and its proximity to the Seaside Lagoon and Basin 3 was analyzed. The analysis found that even during times of peak demand at the boat launch the maximum rate would be four launches per hour per lane, which is approximately two boats entering the harbor every 15 minutes. This was not found to be a significant increase in boat traffic and would not disrupt existing harbor traffic or impact water use. Boats returning to the launch ramp for retrieval may arrive at more frequent intervals in the afternoon. Based on a very conservative (i.e., worst-case) assumption that one-half of the 40 boats (i.e., the maximum capacity of the boat launch ramp parking lot) return within a 2.5 hour mid- to late-afternoon time window, the boat retrieval activity during such a high peak demand period could be accommodated with a retrieval rate of eight boats per hour and the remaining 12 boats may queue nearby at any one time. Sufficient space within the turning basin or the north end of the outer harbor near the mooring area is available for temporary mooring until boarding float space becomes available. On non-peak days, the number of boat launches are estimated to be much lower. This system is expected to be more efficient than the current boat hoist system in Basin 3 under existing conditions, because the hoists require assistance from the marina office/hoist operator, and thus can experience longer waits. Even then, this system has safely handled greater volumes of boat traffic, as noted in Draft EIR Table 3.13-8.

As determined in the Draft EIR, construction of the Mole C boat launch could result in an increase in the potential for conflict with personal recreational watercraft (e.g., SUPs, kayaks, peddle boats and other hand launch craft) emanating from Seaside Lagoon. The magnitude of such potential conflicts would, however, be offset because of the slow speeds that the motor boats would operate at during departure from or return to the ramp area. This would allow time for sufficient maneuvering as necessary to avoid errant personal recreational watercraft if encountered. Nevertheless, the proximity

of the small craft boat launch ramp and hand launches from Seaside Lagoon combined with the fact that the interface area between the activities would be somewhat confined by the presence of the breakwater, which may also limit sight lines, could pose a potential safety hazard, which for the purposes of this EIR is considered to be a significant impact. As indicated starting on page 3.13-82 in Section 3.13 of the Draft EIR, with anticipated slow speeds in the entrance area of the proposed small craft boat launch facility and the open Seaside Lagoon, and implementation of mitigation measure MM TRA-8: Boat Launch Ramp/Personal Recreational Watercraft Interface Management, safety would be enhanced in that area and would reduce the potential for interface conflicts between boats and personal recreational watercraft operating in proximity to each other. This mitigation measure for the proposed project provides for buoys and signage segregating waterside boat lanes and personal recreational watercraft and includes provisions for safety instruction for personal recreational watercraft users. As such, the impact after mitigation is considered less than significant.

Comments were also received on the proposed breakwater at Mole C boat ramp to create a blind spot for boaters who would not be able to see paddlers returning to the Seaside Lagoon launch point and thereby creating a hazardous condition. As noted above, because of the slow speeds that the motor boats would operate at during departure from or return to the ramp area, there would be sufficient maneuvering area and time to safely avoid errant personal recreational watercraft if encountered. In addition, there will be buoys with signage placed in the turning basin to delineate, and segregate waterside boat lanes and paddle craft lanes. The waters of the United States (which includes King Harbor and the water portion of the project site) and its territories are marked to assist navigation by the U.S. Aids to Navigation System. The goal of the U.S. Aids to Navigation System is to promote safe navigation on the waterway. This system employs a standardized and simple arrangement of colors, shapes, numbers and light characteristics to mark navigable channels, waterways and obstructions adjacent to these. Like information for drivers on the roadways, Aids to Navigation provide a boater signage and demarcation aids to help in determining location, getting from one place to another or staying out of danger. Although the primary components of the U.S. Aids to Navigation System are beacons and buoys, the aids may be anything from lighted structures, beacons, day markers, range lights, fog signals and landmarks to floating buoys. Each has a purpose and helps in safe navigation. Mitigation measure MM TRA-8 also requires SUPs, kayaks, and peddle boat renters to be provided with instruction on safety and waterside signage. Additionally, interaction with rogue SUPs and other rules-of-the –road violators would continue to be managed and enforced by Harbor Patrol as they do on a regular basis and the more “busy” days of harbor use. As such, the impact after mitigation is considered less than significant.

In addition, the reversing of the breakwater footprint, as suggested by some commenters, to avoid interaction with the lagoon, would not be appropriate, as this may reflect waves into the launch area. The main purpose for the breakwater is to protect the boarding float from storm damage, the reversed breakwater would not protect the float during storms as well due to the direction of the opening to the west. This would defeat the reason for a breakwater. The Draft EIR in Chapter 4, Analysis of Alternatives, did analyze a single/one-lane ramp with no breakwater, which would not include the installation of a breakwater and would therefore allow boats to more easily maneuver from the lagoon and reduce interaction with SUPs, kayaks, paddle board, and peddle boat renters. The elimination of the breakwater however would likely require more maintenance of the boating floats due to lack of storm protection. The elimination of the breakwater is not a safety concern associated with operations.

Alternate Location:

Comments were received on siting a boat launch ramp facility at Mole B. The Draft EIR included an alternative – Alternative 8: Alternative Small Craft Boat Ramp Facilities Within King Harbor – that included six boat ramp facilities within King Harbor (three at Mole A, one at Mole C and two at Mole D). At the time of the Draft EIR, designs for installation of a boat launch ramp facility at Mole B on land partially controlled by the City were also considered. The designs at the time included the placement and orientation of the launch ramp into Basin 2. It was determined that potential environmental impacts associated with ingress/egress to the Harbor Patrol facility and boat trailer parking constraints due to the limited size of the area controlled by the City on Mole B would be greater than the proposed project. As shown in Final EIR Figures 2-4 and 2-5, based on the available space and layout at Mole B considered in the Draft EIR, it was determined locating a boat launch ramp at Mole B would require removal of up to approximately 22 boat slips and marina parking stalls (controlled by a leaseholder), and depending on the number of launch lanes and boat trailer parking spaces installed could require elimination of a portion of Moonstone Park. While a one-lane small craft boat launch ramp and parking (Final EIR Figure 2-4) could be accommodated, a two-lane ramp would require converting the entire Moonstone Park to a parking lot (Final EIR Figure 2-5). Therefore, the Mole B designs with launch ramp orientation into Basin 2 studies at the time were eliminated from further consideration.

Although no location within King Harbor stands out as an ideal location, since the public review of the Draft EIR, the City has continued to work with the public regarding the location of the proposed boat ramp facility. During this continued effort, the City has been in negotiations with the Marina Cove Ltd. (MCL), the master leaseholder of the King Harbor Marina in Mole A and portions of Mole B. Based on current negotiations, MCL could amend their lease boundary to exclude the most northwestern portion of Mole B to accommodate the boat ramp facility. Please refer to Chapter 1, Section 1.3.2 of Chapter 1, Introduction within this Final EIR, for a discussion of the Staff Recommended Alternative, which consists of further refinements to siting a boat ramp in King Harbor, including a proposed launch facility at Mole B with launch ramp orientation into Basin 1 (rather than Basin 2). Additionally, this discussion contains a more detailed environmental analysis associated with Mole B than that the Draft EIR Alternatives screening analysis (which was similar to the type of preliminary analysis in an Initial Study).

2. Parking and Boat Ramp Usage:

Several comments were received regarding the reduction in the amount of trailer parking from the existing number of spaces. Comments were also received on the demand that a boat ramp would cause and that the proposed one- or two-lane ramps would not be sufficient for the demand (‘build a ramp and boaters will come’). Please see Master Response #7, Section 3, which addresses this issue.

Parking at Mole A

Commenters alleged that vehicle and trailer parking would be a problem at the Mole A location alleging parking is already at capacity for Yacht Club members, guests, the youth sailing program participants, and parking for those people with slips in the adjacent to portions of the King Harbor Marina (for docks G, H, I & J). If the Mole A Alternative from the Draft EIR is chosen as the location for the boat ramp, the surface parking area would be rearranged to accommodate the boat ramp parking (potentially 20 or 40 spaces depending on the capacity of the ramp chosen), as well to as maximize parking for the Yacht Club and marina parking.

Comments were also received noting that the turning radius at the Mole A boat ramp would be limited and make parking and maneuvering with a trailer difficult. As shown on Figures 4-5a through 4-5c of the Draft EIR, the Alternative 8 – Mole A options include a 60 foot radius roundabout at each end of the proposed Mole A facility, which is enough area to maneuver a trailered boat. Additionally, queuing areas would be delineated in conjunction with the detailed design of the selected boat ramp facility site.

MASTER RESPONSE NO. #9: VIEWS AND SCALE OF DEVELOPMENT

The visual impact analysis is presented in Section 3.1 Aesthetics and Visual Resources of the Draft EIR. The analysis was prepared by the City and their consultants that include experts in the field of visual analysis, including Steve Horton, a 3D graphic artist that has over 33 years of experience in civil and mechanical engineering, and Katie Owston, a planner with over 15 years' experience in CEQA visual analysis. For a complete list of CEQA experts with their expertise, see Chapter 3 Modifications to the Draft EIR within this Final EIR for supplemental information added in Chapter 7, List of Preparers of the Draft EIR regarding consultant's areas of expertise.

Several comment letters address the visual impact analysis in the Draft EIR, including the 1) view analysis, such as the locations that were selected as Key Observation Views (specifically Czuleger Park and Harbor Drive), and the determination that impacts would be less than significant; and 2) the visual design and character, such as building elevations and building massing.

Following is a detailed response associated with the concerns:

1. Selection of Key Observation Views:

As all views of the project site cannot feasibly be examined, the view analysis presented in the Section 3.1, Aesthetics and Visual Resources of the Draft EIR assesses changes in views from several representative locations with views of the project site under the threshold AES-1 addressing "designated local valued view available to the general public. Seven locations were selected for analysis that are identified in the Draft EIR as "Key Observation Views 1 through 7." The methodology for the selection process for Key Observation Views is discussed in Draft EIR Section 3.1.2.3.4; these Key Observation Views were determined to be representative of other view locations in their proximity. These locations were selected by the City in consultation with their consultants as representative views. As described in Section 3.1.2.3.4, the Key Observation Views were selected for analysis because: 1) they are protected public views identified in City planning documents; or 2) they would become key views under the proposed project. Additionally, the selected views are representative public views typical of the view analysis process used in other cases that have been considered by the Coastal Commission, including the 1000 Esplanade project appeal. As noted in greater detail in this Master Response, many of the Key Observation View locations (particularly those along Harbor Drive) are from relatively flat locations and provide very limited views under existing conditions. (See *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [upholding less than significant view impact conclusion because "the Site and surrounding area is generally flat, and therefore the project will not have an adverse impact on scenic vista."].)

Additionally, several commenters have requested analysis from their own private property. These locations do not meet the significance criteria of being a "local valued view available to the general public." (See also *North Coast Rivers Alliance v. Marin Municipal Water District Board of Directors* (2013) 227 Cal.App.4th 832 [Upholding selection of scenic vista aesthetic criteria which stated "a scenic vista is defined as a publicly accessible viewpoint that provides expansive views of a highly valued landscape. A viewpoint that is accessibly only from private property is not considered a scenic vista."].) Furthermore, it is not feasible nor does CEQA require an analysis of every geographic location, from different viewing angles, and from different viewing heights. (CEQA Guidelines Section 15204(a).)

Nevertheless, Final EIR Figure 2-13 provides several cross sections in the southern portion of the project site in the general proximity to the existing private residences.

Comments specifically questioned the Key Observation Views from Czuleger Park and Harbor Drive, the selection of which are addressed below.

1.1 Czuleger Park

As described in Section 3.1.2.3.4, the three view locations that are identified as Key Observation Views from Czuleger Park, were selected for analysis because they are specifically identified as protected ocean view corridors. The views were identified as protected views in the 1975 settlement agreement between the California Coastal Zone Conservation Commission and the City. The views identified in the settlement agreement, and used as Key Observation Views in the Draft EIR, are from the observation point, which was constructed as a public viewing area. Figure 3.1-5a in the Draft EIR incorporates a graphic from the Settlement Agreement that identifies the precise viewing location and the angle of the protected views.[20] As identified in the Settlement Agreement, one of the purposes in establishing the park was to protect the identified ocean view corridors.

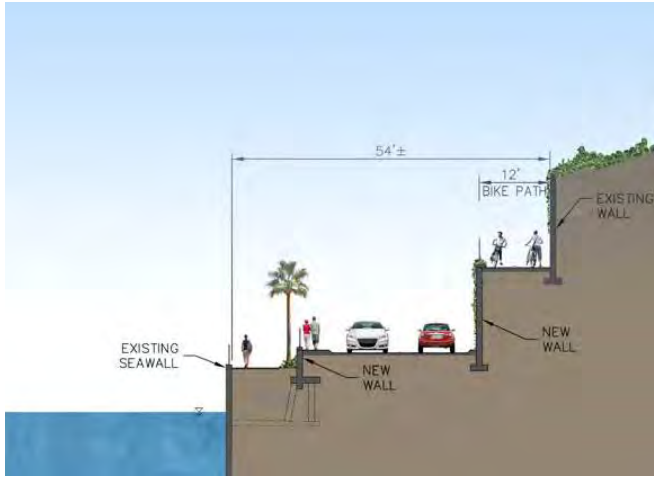
The protection of the views specified in the Settlement Agreement is further reinforced by the following provision of the Recreation and Parks Element 3.4.6 Implementation Program, which states:

> Enforce the following provisions of the settlement agreement (1975) between the California Coastal Zone Conservation Commission and the City related to "The Village" and Czuleger Park

Two of the view corridors (Key Observation Views 1 and 2) are very limited due to existing development, however given that they are specifically identified as protected views corridors, they were addressed in the Draft EIR to demonstrate that no further obstruction to these protected views would occur under the proposed project. Key Observation View 3, which is analyzed in greater detail in the Draft EIR, is the more expansive ocean view corridor that is protected under the Settlement Agreement, and it provides an excellent vantage point with a sweeping view of the harbor, which, due to intervening development, is not readily available to the public from the surrounding streets and sidewalks. This location includes a prominent view of the project site clearly visible in the foreground. Thus, this view provides a representative view of the project site from the Czuleger Park in accordance with the settlement agreement.

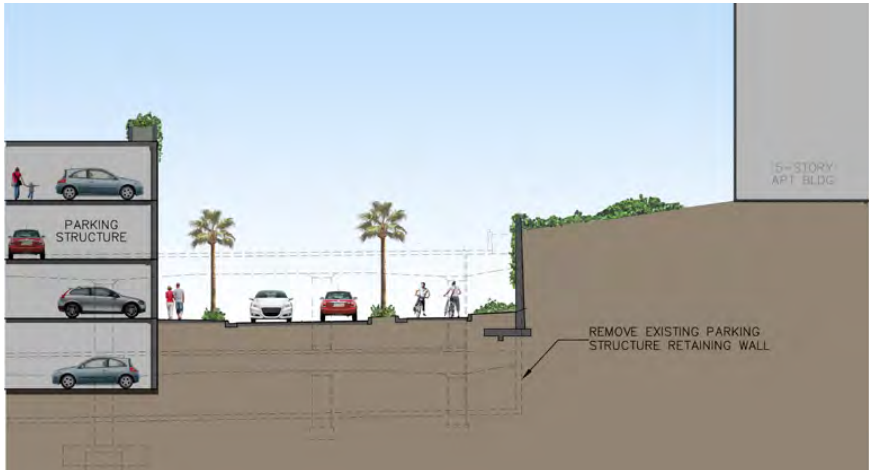
Comments were received suggesting other locations should have analyzed from Czuleger Park. It would be impossible to analyze all locations and viewing angles from the park and therefore, as described above, the selection of the locations analyzed was based on the views specifically identified as protected. Such views were "selected for visual assessment and are representative of other view locations in their proximity." (Draft EIR Section 3.1.2.3.4.) While the views from other locations in the upper and mid-elevations of the park would be similar to that of the view from Key Observation View 3, several comments state that the development would be more visually prominent at lower elevations in the park. This is correct, primarily in terms of views of the market hall, which would be more visible from the lower elevation of the park. However, while the market hall would be viewable from certain locations, views of the ocean would remain available immediately to the north

[20] California Coastal Zone Conservation Commission and Redevelopment Agency of the City of Redondo Beach. 1975. Settlement Agreement related to the Village/Seascape Apartments, Condominiums, and Czuleger Park. December 22. Site Plan Parcel D and G, Sheet 3.



Pacific Ave through Basin 3
Typical Section

Pacific Ave through Basin 3
Apartment Staircase Section



Pacific Avenue at South Side
Parking Structure 'C' Typical Section

Source: Callison, 2016
Note: For discussion purposes only.

and south. This is demonstrated in Final EIR Figure 2-14, which shows the view from the lower elevation of Czuleger Park under existing and proposed conditions. As shown in this figure, Basin 3 and a view of the ocean remain available. Additional views of the ocean would be available to the south. It should also be noted that approximately two-thirds of the Market Hall located northwest of Czuleger Park is only one-story, with the remaining one-third of the building at two-stories. This is within the permissible heights that were approved by the City, the electorate, and Coastal Commission for the CC-3 zone. Further, as described above and in Section 3.1 of the Draft EIR, the ocean view corridors would not be substantially altered and views of the ocean would remain from other locations in the park. The City has provided the following view of the project site from lower elevations, further west in Czuleger Park (Final EIR Figure 2-14 above). This additional viewpoint does not alter the conclusions discussed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, valued views of the ocean would remain available from Czuleger Park and the impact would be less than significant.

1.2 Harbor Drive

Comments were received regarding the appropriateness of selecting viewpoints along Harbor Drive that are located at the view corridors as opposed to showing views that would allegedly be lost along Harbor Drive due to new development. The view corridor locations were selected as Key Observation Views 4 and 5 to show changes to existing views along Harbor Drive and provide visual representation of the views of the water that would remain available along Harbor Drive. The Draft EIR provides an analysis not only of views from these locations, but along the length of Harbor Drive adjacent to the project site.

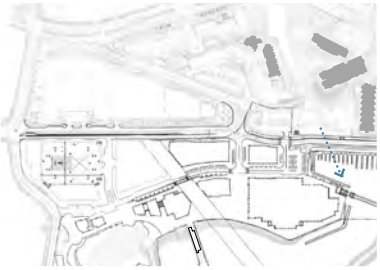
Furthermore, as noted under CEQA Guidelines Sections 15125(a) and 15126.2(a), the purpose of the CEQA analysis is to describe the changes to the existing environment caused by the project. While many commenters have alleged the project would result in significant impacts to view along Harbor Drive, views of the water are limited under existing conditions. (See Bowman v. City of Berkeley (2004) 122 Cal.App.4th 572 [upholding less than significant view impact conclusion because "the Site and surrounding area is generally flat, and therefore the project will not have an adverse impact on scenic vista."].) As noted in Draft EIR Section 3.1, Aesthetics and Visual Resources, page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Attached to this Master Response is Final EIR Figure 2-15 that provides additional photographs taken from pedestrian height on the sidewalk along the western edge of Harbor Drive, that show narrow views of the water from some locations along Harbor Drive, and little to no view of the water from other locations.

Key Observation Views points 4 and 5 were determined to be representative of existing conditions along Harbor Drive, and are shown in Draft EIR 3.1-5b. Section 3.1.4.1.1 provides a general overview of the methodology for analyzing impacts to views:

> Whether an alteration of views is "substantial" depends on the extent to which the proposed project may interfere with visual access to visual resources (i.e., the degree to which a view of the Pacific Ocean is lessened/altered).



EXISTING CONDITION

PROPOSED DEVELOPMENT WITHOUT LANDSCAPING

PROPOSED DEVELOPMENT WITH LANDSCAPING

Source: Callison, 2016
Note: For discussion purposes only. Actual development and placement details may vary.

Figure 2-14
View from Czuleger Park (Bottom)

Source: CDM Smith, 2016

Figure 2-15
Views on Harbor Drive

The Draft EIR pages 3.1-44 through 3.1-46 provide a discussion of the view impacts along Harbor Drive, and Figures 3.1-8 and 3.1-9 show a comparison of the changes to the existing views along Harbor Drive caused by the project. The Draft EIR acknowledges that "existing water views would decrease along portions of Harbor Drive south of Portofino Way, but new, higher quality, water views would be established along other portions of Harbor Drive and Pacific Avenue Reconnection (a continuation of Harbor Drive). This project would also allow for new views of the water from the new main street." In addition, the new Pacific Avenue Reconnection would be approximately 28 feet below the first floor residences of the adjacent Village/Seascape condominiums and not expected to alter existing views along the new roadway. This approach is also consistent with the text of the City's policy along Harbor Drive, which states that "new development projects shall include view corridors to the water from N. Harbor Drive," not from every location along Harbor Drive as suggested by many comments.

Several comments have also asserted that there would be approximately 80 percent blockage of views along Harbor Drive. These comments do not explain how they reached this determination, however, it appears to be based on an measure of the existing linear building length along Harbor Drive as compared to a measurement of the linear building length under the proposed project along Harbor Drive, as opposed to a line of sight analysis that assesses the areas from which the water can be viewed under existing conditions as compared to project conditions. As described in Section 3.1, Aesthetics and Visual Resources, given the distance from the water, flat topography, and the presence of intervening features, the views of the water that are available from Harbor Drive are fleeting, narrow and of limited quality. As shown in Final EIR Figure 2-15 there are certain locations where views of the water are largely non-existent and thus linear building area along Harbor Drive does not equate to view blockage. The assertions of 80 percent view blockage by the proposed project, does not appear to have taken this into account. Consequently, these comments ignore the view analysis methodology described "Whether an alteration of views is "substantial" depends on the extent to which the proposed project may interfere with visual access to visual resources (i.e. the degree to which a view of the Pacific Ocean is lessened/altered)." To the extent these commenters are raising an argument related to visual character, they are directed to Section 3.1.4.1.2 for discussion of Visual Character methodology, and the analysis of Impact AES-2 starting on page 3.1-50.

Under the proposed project, based on a frontage length of 2,684 feet (from the northeastern edge of the project site at Portofino Way/Harbor Drive to the intersection of the Pacific Avenue Reconnection and Torrance Circle, there would be approximately 1,584 feet of development adjacent to Harbor Drive and the Pacific Avenue Reconnection. This constitutes approximately 60 percent of the length of the project site (not including Torrance Circle), and takes into account the new views that would be opened up along the Pacific Avenue Reconnection (though it does not account for the new views from the new main street).

There is additional development that is set back 125 feet or more from the eastern edge of the project site and not overlapped by development along the eastern boundary. This includes a portion of the market hall, hotel/retail/parking development and small portions of other small retail/restaurant buildings. These building are setback from Harbor Drive and Pacific Avenue Reconnection and interspersed with the view corridors and the Redondo Beach Marina in Basin 3 and thus, do not represent a complete blockage of views.

No new information has been presented in the comments relative to view on Harbor Drive that demonstrates that greater environmental impacts than those identified in the Draft EIR would result.

2. Visual Design and Character:

2.1 Building Elevations and Level of Detail

The Draft EIR analyzes the most intense scenario that could be developed under the proposed project based on an Application for an Environmental Assessment filed with the City in April 2014 and conceptual plans provided to the City by the project applicant. This provides enough specificity under CEQA to evaluate the potential environmental impacts of the proposed project and alternatives. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.]; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [In the Bowman case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant "…even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense."] Most recently in *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1053-1055, the Court rejected a similar argument from Petitioners alleging that the project description was inadequate because "the specific configuration and design of particular buildings is left for future review…the Project's street network and layout is conceptual at this point, with the final layout subject to review by applicable agencies…" In rejecting these arguments the Court of Appeal noted:

> Contrary to these criticisms, the EIR made an extensive effort to provide meaningful information about the project, while providing for flexibility needed to respond to changing conditions and unforeseen events that could possibly impact the Project's final design… as a matter of necessity at this stage in the planning process, there are many Project features that are subject to future revision, and quite likely will be the subjects of supplemental review before the final Project design is implemented. However, the EIR cannot be faulted for not providing detail that, due to the nature of the Project, simply does not now exist.

Figure 2-8 in Chapter 2, Project Description of the Draft EIR discloses the maximum heights of the individual structures (or range of heights for multi-story structures). As also described in Chapter 2 and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with the height requirements specified in the Coastal Zoning and other relevant land use planning documents. The specific height requirements for each area within the project site are identified in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards in Section 3.9, Land Use and Planning of the Draft EIR.

CEQA Guidelines Section 15004(b) states that EIRs should be prepared "as early as feasible in the planning process to enable environmental consideration to influence project program and design and yet late enough to provide meaningful information for environmental assessment." The project ultimately approved by the City could have variations from that which is analyzed in the Draft EIR, provided that the building heights and intensities are within the scope of the Draft EIR or review to determine whether additional environmental analysis is needed pursuant to CEQA Guidelines Sections 15088.5, 15162, 15163, or 15164. (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1062. ["The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project…"].) As part of the City's standard project review procedure, when the design and engineering plans are submitted, they would be reviewed to ensure that the proposed project would fit within the bounds of the certified EIR for the project and any approvals issued by the City. Additionally, the project will be subject to the City's Design Review process contained under Redondo Beach Municipal Code (RBMC) Section 10-5.2502.

Attached to this Master Response is Final EIR Figure 2-16 that provides a visual depiction of the maximum height limits for all portions of the project, as specified in the Coastal Zoning.

Legend

- Project Area
- Existing Structured Public Parking
- Breakwater Fill Area

P-PRO
- No building or structure shall exceed a height of thirty (30) feet
- No building shall exceed two (2) stories

CC-1
- No building or structure shall exceed a height of thirty (30) feet as measured from the top of the pier deck or sidewalk grade, as applicable
- No building shall exceed two (2) stories

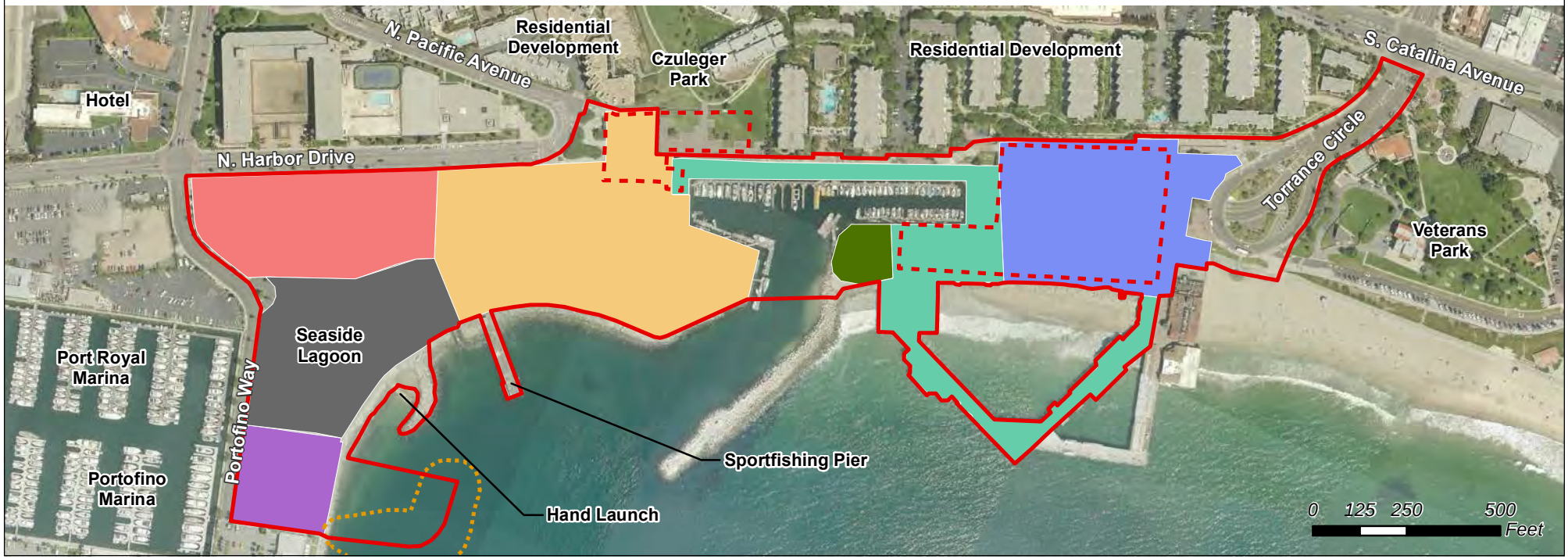
CC-1
- Building height up to forty (40) feet may be permitted on the Parcel 10 site
- No building shall exceed two (2) stories

CC-2
- No building or structure shall exceed a height of thirty (30) feet above the sidewalk grade of Pier Plaza (top deck of parking structure).

CC-3 – Area 1
- No building shall exceed two (2) stories and a height of thirty-seven (37) feet south of the southerly existing boundary of Seaside Lagoon. In this area, no more than fifty (50%) of the cumulative building footprint area shall exceed one story and a height of twenty-four (24) feet
- Height shall be measured from the existing sidewalk grade at Harbor Drive at the point nearest to the building or structure

CC-3 – Area 2
- No building shall exceed a height of forty-five (45) feet and a maximum of three (3) stories north of the southerly existing boundary of Seaside Lagoon.
- Height shall be measured from the existing sidewalk grade at Harbor Drive at the point nearest to the building or structure.

CC-4 – Area 1
- No building or structure shall exceed a height of forty-five (45) feet
- No building shall exceed three (3) stories
- Height shall be measured from the existing sidewalk grade at Harbor Drive at the point nearest to the building or structure



Source: City of Redondo Beach, 2007; Noble Consultants, Inc., 2015

Figure 2-16
Building Height Limits

2.2 Massing

Comments were received expressing concerns on the massing of the proposed project, in particular the parking structure and other development along the edge of Harbor Drive. Massing references both height and the floor area of the project, both of which were considered under Impact AES-1 (Local Valued Views) and Impact AES-2 (Visual Character). However, when this issue is raised, most commenters appear to be addressing impacts associated with Visual Character. For discussion of Local Valued Views, please see Section 1 of this Master Response.

As discussed in Chapter 2, Project Description, and further described in Section 3.1, Aesthetics and Visual Resources, the proposed project includes a mix of single-story and multi-story buildings, as well as open space, pedestrian and bicycle paths and other at-grade improvements. The visual simulation presented in Figure 3.1-17 on page 3.1-58 of the Draft EIR illustrates the size and scale of project-related structures proposed along the west side of Harbor Drive extending south from Portofino Way. Based on the extensive information and analyses provided over the 75 pages of Section 3.1, it was determined that the project-related impacts would not exceed the thresholds of significance presented on page 3.1-36 of the Draft EIR. The existing conditions associated with Visual Character are described in detail in Draft EIR Section 3.1.2.3.1 and summarized at the beginning of Impact AES-2 on Draft EIR page 3.1-50:

> …the project site is currently developed with 219,881 square feet of structures (not including the parking facilities), with limited landscaping. The site is visually characterized by large paved surface parking lots and stand-alone buildings dispersed haphazardly throughout in the northern portion of the site with no central connectivity, while the southern portion of the site is more densely developed than the northern portion and largely characterized by tourist facilities, including small shops and restaurants and the Horseshoe Pier. There is limited visual and physical connectivity between the northern and southern portions of the site, and a number of structures are currently suffering from physical deterioration.

The Draft EIR acknowledges that the Visual Character of the Site would change in comparison to existing conditions; however, these changes were determined to be less than significant. Please see Draft EIR pages 3.1-50 through 3.1-66 for additional details.

As further discussed in the April 8, 2008 report prepared for the City Council public hearing on the zoning for the project site, massing of the project site is considered as supportive of pedestrian oriented development envisioned for the waterfront and as establishing a development that can fully accomplish the Guiding Principles and Revitalization established for the Harbor and Pier area. The staff report for the 2008 zoning amendments explained that "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.) Additionally, "Pedestrian-active commercial areas generally require higher FARS [Floor to Area Ratios[21]] than auto-oriented centers… a low

[21] "Floor Area Ratio" (FAR) means the numerical value obtained by dividing the gross floor area of a building or buildings located on a lot by the total area of the lot/water area. For example, a FAR of 0.25 would mean that there is the equivalent one square foot of single story structural development for every four square feet of land/water surface. A two story structure occupying one fourth of the total area of a parcel would have an FAR of 0.50.

FAR may not achieve the character and amenities desired for the Harbor area, and too low an FAR is not likely to result in a pedestrian-active character." (April 8, 2008 Administrative Report, pages 35 and 37.) Further, the placement of the parking structures along Harbor Drive, would concentrate the parking away from the waterfront.

As described in Section 3.1, Aesthetics and Visual Resources, the buildings would include features such as building articulation and a variety of complementary architectural styles, building materials that provide a variety of textures and colors, and public art that may include murals along the façade of the parking structure that would soften the buildings and create visual interest.

In addition, the proposed development is considered low as compared to others within the coastal zone. The cumulative development cap was subsequently considered and certified by the California Coastal Commission. Coastal Commission staff responded to allegations that 400,000 square feet of new floor area constituted excessive development and noted in its staff report "This low FAR [Floor area ratio] coupled with incentive bonuses for additional open space will significantly limit the massing of structures and provide open space within the Harbor/Pier area." (Coastal Commission Admin Report & Addendum for July 9, 2009 hearing, Item Th11a, page 17.)

2.3.2 State Government

COMMENT LETTER NO. AS001 CALIFORNIA STATE LANDS COMMISSION

Comment AS001-1

Thank you for the opportunity to comment. Attached is an electronic copy of the California State Lands Commission staff comment letter on the above-referenced document.

The original hard-copy has been mailed via postal mail to the lead agency also.

Diana Hearnley
California State Lands Commission
100 Howe Avenue, Suite 100-S
Sacramento, CA 95825
diana.hearnley@slc.ca.gov

Response to Comment AS001-1

Thank you.

Comment AS001-2

The California State Lands Commission (CSLC) staff has reviewed the subject Draft EIR for The Waterfront Project (Project), which is being prepared by the city of Redondo Beach (City). The City, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code,§ 21000 et seq.). The CSLC is a trustee agency for-projects that could directly or indirectly affect sovereign lands and their accompanying Public Trust resources or uses. CSLC staff previously commented on the Notice of Preparation for the EIR on July 18, 2014 (see attached).·

CSLC Jurisdiction and Public Trust Lands

The CSLC has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The CSLC also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd._(c), 6301, 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the Common Law Public Trust.

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

A portion of the proposed Project will involve lands that have been legislatively granted to the City, pursuant to Chapter 57, Statutes of 1915, and as amended by Chapter 1555, Statutes of 1971. The City, as trustee, of these sovereign lands must ensure that the specific uses proposed on the lands are consistent with the granting statutes and the Public Trust Doctrine.

Project Description

As presented in the Draft EIR, the proposed Project, located in the City's Coastal Zone south of Portofino Way, North of Torrance Boulevard, and west of Harbor Drive/Catalina Avenue, would revitalize approximately 36 acres (land and water) of the 150-acre waterfront, by redeveloping and expanding local and visitor serving commercial uses, enhancing public access and recreational opportunities and facilities, and improving the aging support infrastructure and parking facilities. The Project also proposes substantial improvements in site connectivity, public access and public views to and along the waterfront. The main components of the proposed Project are demolition of approximately 207,402 square feet of existing structures, replacement of the existing Pier Parking Structure, retention of 12,479 square feet of existing development, and construction of up to 511,460 square feet to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel. The total amount of new and remaining development on-site would be 523,939 square feet (304,058 square feet of net new development).

The proposed Project also includes public recreation enhancements such as a new small craft boat launch ramp, improvements to Seaside Lagoon (opening of the lagoon to King Harbor as a protected beach), new parking facilities, expanded boardwalk along the water's edge, enhanced public open space, and pedestrian and bicycle pathways. Site connectivity and public access to and along the water would be improved by the establishment of a new pedestrian/bicycle bridge across the Redondo Beach Marina/Basin 3 entrance and the reconnection of Pacific Avenue.

Response to Comment AS001-2

The commenter has provided an overview of CSLC jurisdiction and the proposed project. As discussed on Draft EIR page 3.9-29, the proposed uses were determined to be consistent with the City’s Tidelands grant.

Comment AS001-3

Land Exchange/Tidelands Description

1. As stated in the Draft EIR, implementation of the Project may require the CSLC to consider and approve a land exchange between the CSLC and the City consistent with Public Resources Code section 6307. Please contact Reid Boggiano in the Granted Public Trust Lands Program (see contact information below) to discuss a land exchange proposal.

2. Tidelands Property Exchange. Page 2-78 states "As described in Section 2.2.1, the Tidelands held in trust by the City...," however, there is no Section 2.2.1 in the document. Please provide the location of the relevant description.

CSLC staff has no further comments on the content of the Draft EIR. Thank you for the opportunity to comment. Please send copies of future Project-related documents, including electronic copies of the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination (NOD), CEQA Findings and, if applicable, Statement of Overriding Considerations when they become available (and refer questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at (916) 574-1310 or via e-mail at Cynthia.Herzog@slc.ca.gov). For questions concerning granted lands and the potential land exchange, please contact Reid Boggiano, in the Granted Public Trust Lands Program, at (916) 574-0450, or via e-mail at Reid.Boggiano@slc.ca.gov.

Response to Comment AS001-3

As shown in Chapter 3 of the Final EIR, Modifications to the Draft EIR, the text of Draft EIR page 2-78 has been revised as follows: "As described in Section 2.1.1.2, the Tidelands held in trust by the City are based on the MHTL designated in 1935, prior to the construction of King harbor in its current configuration, including Basin 3…" Thank you for your comments. The City looks forward to working with the CSLC staff in the near future regarding the proposed land exchange.

Comment AS001-4

July 18, 2014

File Ref: SCH # 2014061071

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

Dear Ms. Owston:

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

CSLC Jurisdiction and Public Trust Lands

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

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes arid waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of the people of the State for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line, except for areas of fill or artificial·accretion·or where the boundary has been fixed by agreement or a court. On navigable lion-tidal waterways, including lakes, the State holds fee ownership of the bed of the waterway landward·to the ordinary low water mark and a Public Trust easement landward to the ordinary high water mark, except where the boundary has been fixed by agreement or a court. Such boundaries may not be readily apparent from present day site inspections.

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

Project Description

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

Environmental Review

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

General Comments

1. Project Description: Page 12 of the NOP states that "Construction activities associated with project elements such as the boat launch ramp, Seaside Lagoon, and pedestrian bridge, may include dredging, filling, rock placement, in-water concrete placement, sheetpile installation, pile driving, shoreline protection

and other above and below water activities." A thorough and complete Project Description should be included in the EIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or deposited, seasonal work windows, locations for material disposal, etc.), as well as the details of the timing and length of activities. Thorough descriptions of all Project phases will make for a more robust analysis of the work that may·be·performed, and minimize the potential for subsequent environmental analysis to be required.

Biological Resources

2. Consultation: The EIR should include a discussion of consultation with the Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), including any recommended mitigation measures and potentially required\ permits identified by these agencies for any special-status plant or wildlife species that may occur in the Project area. ·

3. Construction Noise: The EIR should also evaluate noise and vibration impacts on fish and birds from construction, flood control activities in the water, on the levees, and for land-side supporting structures. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Cultural Resources

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

5. Title to Resources: The City should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the CSLC. CSLC staff requests that the City consult with Assistant Chief Counsel Pam Griggs (see contact information below), should any cultural resources on state lands be discovered during construction of the proposed Project.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and potential responsible agency, we request that you consid.er our comments prior to certification of the EIR. Please send copies of future Project-related documents, including electronic copies of the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination (NOD), CEQA Findings and, if applicable, Statement of Overriding Considerations when they become available, and refer questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at (916) 574 1310 or via e-mail at Cynthra.Herzog@slc.ca.gov; For questions concerning archaeological or historic resources under CSLC jurisdiction, please contact Assistant Chief Counsel Pam Griggs at (916) 574-1'854 or via email at Pamela.Griggs@slc.ca.gov. For questions concerning CSLC jurisdiction, please contact Reid Boggiano, in the Granted Public Trust Lands Program, at (916) 574-0450, or via email at Reid.Boggiano@slc.ca.gov.

Response to Comment AS001-4

The items that CSLC staff requested be analyzed in the EIR (as stated in Comment AS001-4 above, were addressed in the Draft EIR as appropriate. As noted under AS001-3 above, CSLC staff has no further comments on the content of the Draft EIR; hence, the items from the NOP were addressed.

Thank you for your comments. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. AS002 CALTRANS

Comment AS002-1

Attached please find Caltrans' comment letter for the Waterfront Project. I will be sending out the hardcopy today as well.

Thank You,

Miya Edmonson
Associate Transportation Planner Caltrans District 7,
IGR/CEQA Branch

Response to Comment AS002-1

Following is the comment letter received.

Comment AS002-2

January 19, 2016

Re: The Waterfront
SCH # 2015121076
Vic: LA-1-10, 1-405/PM 4.409
IGR#151136ME –DEIR

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Waterfront Project.

The main components of the proposed project are demolition of approximately 207,402 square feet of existing structures, replacement of the existing Pier Parking Structure, retention of 12,479 square feet of existing development, and construction of up to 511,460 square feet to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel.

Please reference our comment letter dated July 21, 2014 and consider the following comments. The comments letter has been attached for your convenience:

Response to Comment AS002-2

The commenter has provided a summary of the components of the proposed project and references NOP and Draft EIR comments, which follow.

Comment AS002-3

- The DEIR excludes a project trip assignment map and/or maps. There should be a trip assignment map referencing the study intersections depicted in figure 3.13-1. More specifically, a trip assignment map should also include the affected mainline freeways (1- 405, I-110) and the affected on/off-ramps within those routes, as identified in the draft Memorandum on the Caltrans facility analysis dated October 20, 2015.

Response to Comment AS002-3

The City has prepared the requested map. However, the requested information was included in the Draft EIR. More specifically, trip distribution assumptions were discussed on Draft EIR page 3.13-43, which noted that "Figures 3 and 12 in Appendix L1 ([Appendix] X-2) of this Draft EIR illustrate the intersection project distribution pattern at study intersections for the proposed project…" Similarly, Draft EIR, Appendix L1, noted that "Detailed trip distribution percentages at each study intersection and turning movement are illustrated for the Project in Appendix X-2."

Comment AS002-4

- Mitigation was identified for affected intersections on Pacific Coast Highway at Anita/Herondo (intersection #7), PCH at Catalina Avenue (intersection # 10) and PCH at Beryl (intersection #19). However, it would be beneficial to include financial costs and funding sources and financing, including sequence and scheduling considerations, for those intersections.

Response to Comment AS002-4

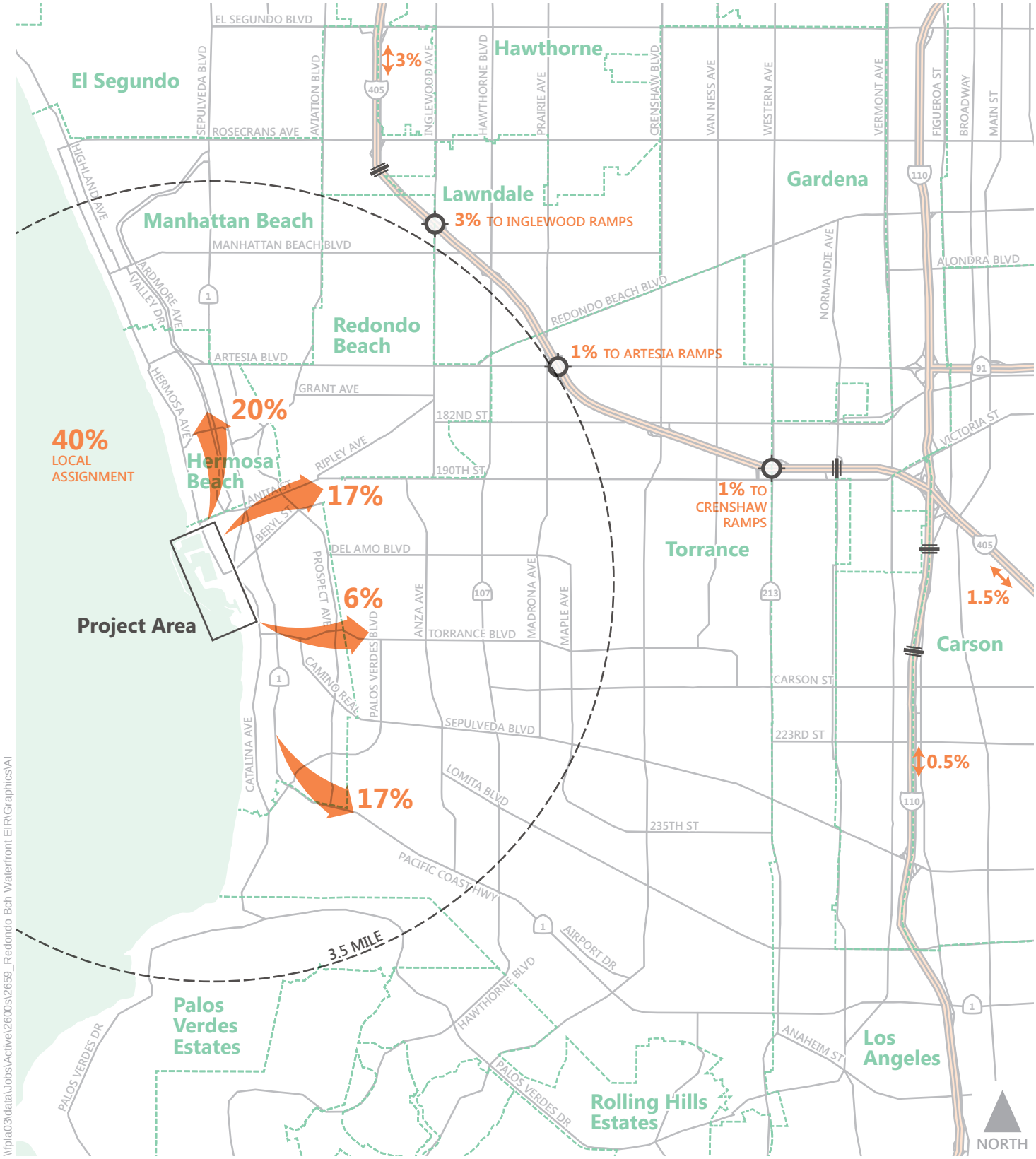
The project applicant is obligated to implement the proposed mitigations, with more detailed sequencing and scheduling information to be included in the Mitigation Monitoring and Reporting Program, which will be considered at the time of project approval. Please also see Response to Comment AL001-16 for discussion of funding and costs of traffic mitigation measures.

Comment AS002-5

- Please identify specific percentage shares for mitigation identified for PCH at Palos Verdes Drive (intersection #36) and PCH at Torrance Boulevard (intersection #26). It would also be helpful to include financial costs and funding sources and financing, including sequence and scheduling considerations, for these locations.

Response to Comment AS002-5

The project applicant is obligated to provide fair share funding for mitigation measures MM TRA-6 at PCH & Palos Verdes Drive and for the northbound right-turn lane as part of MM TRA-5 at PCH & Torrance Boulevard, and is fully responsible for the eastbound right-turn lane at PCH & Torrance Boulevard. More detailed information will be included in the Mitigation Monitoring and Reporting Program, which will be considered at the time of project approval. Please also see Response to Comment AL001-16 for discussion of funding and costs of traffic mitigation measures..



Ramps Mainline Segments

\\fpla03\data\Jobs\Active\2600s\2659_Redondo Bch Waterfront EIR\Graphics\AI

Regional Distribution

Comment AS002-6

If you have any questions, please feel free to contact Ms. Miya Edmonson, the project coordinator, at (213) 897-6536 should you have any questions. Please reference IGR/CEQA No. 151136ME.

Response to Comment AS002-6

Thank you for your comments. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment AS002-7

July 21, 2014

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

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

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

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

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

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.

- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project under consideration, b) cumulative traffic from all specific approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Scenarios involving different assumptions on development and growth should be considered.

- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area.

- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring.

- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Any traffic mitigation fees may be assessed proportionally with the additional traffic generated by the project. (See Caltrans' Traffic Impact Study Guide for a suggested formula).

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

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

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

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

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

Response to Comment AS002-7

The comments provided on the NOP were considered during the preparation of Section 3.13, Traffic and Transportation of the Draft EIR and Appendix X-6 Caltrans Analysis of Appendix L1 of the Draft EIR.

COMMENT LETTER NO. AS003 STATE CLEARINGHOUSE

Scott Morgan
Director, State Clearinghouse
State of California
Governor’s Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95812-3044

Comment AS003-1

January 20, 2016

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 19, 2016, and the comments from the responding agency(ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future' correspondence so that we may respond promptly.

Please note that Section 21104(c} of the 'California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Document Details Report
State Clearinghouse Data Base

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

Type EIR Draft EIR

Description Note: Extended Per Lead

The project would revitalize a portion of the waterfront by r developing and expanding commercial uses, enhancing public access and recreational facilities, and improving the aging infrastructure and parking while enhancing site connectivity, public access and public views. The main components are demolition of approx. 207,402 sf of existing structures, replacement of the existing Pier Parking Structure, and construction of up to 511,460 sf to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel for a total amount of 523,939 sf (304,058 net new) development. Project also includes a new small craft boat launch ramp, opening of Seaside Lagoon to harbor, and pedestrian/bike paths. Site connectivity elements include a new pedestrian/bicycle bridge across Basin 3 and the reconnection of the Pacific Ave.

Lead Agency Contact

Name Katie Owston
Agency City of Redondo Beach

Phone	310 318 0637 x1-2895	*Fax*		
Address	415 Diamond Street			
City	Redondo Beach	*State* CA	*Zip*	90277

Project Location

County Los Angeles
City Redondo Beach
Region
Lat! Long Cross Streets Parcel No. Township

33" 50' 30.9" N I 118" 23' 30.7" W

Portofino Way, Torrance Boulevard, Harbor Drive/Pacific Avenue Multiple

4S Range 14W Section 07 Base

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Floo9 Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Land Uuse; Cumulative Effects; Other Issues

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Reviewing Resources Agency; Department of Boating and Waterways; Califomia Coastal Commission;

Agencies Department of Fish and Wildlife, Regfon 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling arid Recovery; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

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

Date Received 11117/2015 Start of Review 11/17/2015 .End of Review 01/19/2016

Response to Comment AS003-1

Thank you for your confirmation letter acknowledging the state environmental review process information (e.g., list of the state agencies that reviewed the document, official review period, etc.) and transmitting receipt of the comment letter from a responsible agency (i.e., California State Lands Commission) that were received on the Draft EIR.

Comment AS003-2

July 18, 2014

File Ref: SCH # 2014061071

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

Dear Ms. Owston:

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

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

Project Description

The proposed Project, located in the City's Coastal Zone south of Portofino Way, North of Torrance Boulevard, and west of Harbor Drive/Catalina Avenue, would revitalize approximately 35.6 acres of land and water by redeveloping and expanding local and visitor serving commercial uses, enhancing public access and recreational opportunities and facilities, and improving the aging support infrastructure and parking facilities. The main components include proposed demolition of approximately 221,347 square feet of existing structures,

demolition/renovation of the existing pier parking structure, and construction/renovation of up to approximately 523,732 square feet (289,906 square feet net new development) to include retail, restaurant, creative office, specialty cinema, a market hall, and a boutique hotel. The Project includes public recreation enhancements such as a new boat launch ramp, improvements to Seaside Lagoon, new parking facilities, and pedestrian and bicycle pathways. In addition) a new pedestrian bridge would be constructed that spans the approximately 250-foot Basin 3
entrance.

Environmental Review

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

General Comments

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

Biological Resources

2. Consultation: The EIR should include a discussion of consultation with the Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), including any recommended mitigation measures and potentially required\ permits identified by these agencies for any special-status plant or wildlife species that may occur in the Project area. ·

3. Construction Noise: The EIR should also evaluate noise and vibration impacts on fish and birds from construction, flood control activities in the water, on the levees, and for land-side supporting structures. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Cultural Resources

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

5. Title to Resources: The City should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the CSLC. CSLC staff requests that the City consult with Assistant Chief Counsel Pam Griggs (see contact information below), should any cultural resources on state lands be discovered during construction of the proposed Project.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and potential responsible agency, we request that you consid.er our comments prior to certification of the EIR. Please send copies of future Project-related documents, including electronic copies of the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination (NOD), CEQA Findings and, if applicable, Statement of Overriding Considerations when they become available, and refer questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at (916) 574 1310 or via e-mail at Cynthra.Herzog@slc.ca.gov; For questions concerning archaeological or historic resources under CSLC jurisdiction, please contact Assistant Chief Counsel Pam Griggs at (916) 574-1'854 or via email at Pamela.Griggs@slc.ca.gov. For questions concerning CSLC jurisdiction, please contact Reid Boggiano, in the Granted Public Trust Lands Program, at (916) 574-0450, or via email at Reid.Boggiano@slc.ca.gov.

Response to Comment AS003-2

Please refer to Response to Comment AS001-4.

Comment AS003-3

The California State Lands Commission (CSLC) staff has reviewed the subject Draft EIR for The Waterfront Project (Project), which is being prepared by the city of Redondo Beach (City). The City, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code,§ 21000 et seq.). The CSLC is a trustee agency for-projects that could directly or indirectly affect sovereign lands and their accompanying Public Trust resources or uses. CSLC staff previously commented on the Notice of Preparation for the EIR on July 18, 2014 (see attached).·

CSLC Jurisdiction and Public Trust Lands

The CSLC has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The CSLC also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd._(c), 6301, 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the Common Law Public Trust.

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

A portion of the proposed Project will involve lands that have been legislatively granted to the City, pursuant to Chapter 57, Statutes of 1915, and as amended by Chapter 1555, Statutes of 1971. The City, as trustee, of these sovereign lands must ensure that the specific uses proposed on the lands are consistent with the granting statutes and the Public Trust Doctrine.

Project Description

As presented in the Draft EIR, the proposed Project, located in the City's Coastal Zone south of Portofino Way, North of Torrance Boulevard, and west of Harbor Drive/Catalina Avenue, would revitalize approximately 36 acres (land and water) of the 150-acre waterfront, by redeveloping and expanding local and visitor serving commercial uses, enhancing public access and recreational opportunities and facilities, and improving the aging support infrastructure and parking facilities. The Project also proposes substantial improvements in site connectivity, public access and public views to and along the waterfront. The main components of the proposed Project are demolition of approximately 207,402 square feet of existing structures, replacement of the existing Pier Parking Structure, retention of 12,479 square feet of existing development, and construction of up to 511,460 square feet to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel. The total amount of new and remaining development on-site would be 523,939 square feet (304,058 square feet of net new development).

The proposed Project also includes public recreation enhancements such as a new small craft boat launch ramp, improvements to Seaside Lagoon (opening of the lagoon to King Harbor as a protected beach), new parking facilities, expanded boardwalk along the water's edge, enhanced public open space, and pedestrian and bicycle pathways. Site connectivity and public access to and along the water would be improved by the establishment of a new pedestrian/bicycle bridge across the Redondo Beach Marina/Basin 3 entrance and the reconnection of Pacific Avenue.

Land Exchange/Tidelands Description

1. As stated in the Draft EIR, implementation of the Project may require the CSLC to consider and approve a land exchange between the CSLC and the City Gonsistent with Public Resources Code section 6307. Please contact Reid Boggiano in the Granted Public Trust Lands Program (see contact information below) to discuss a land exchange proposal.

2. Tidelands Property Exchange. Page 2-78 states "As described in Section 2.2.1, the Tidelands held in trust by the City...," however, there is no Section 2.2.1 in the document. Please provide the location of the relevant description.

CSLC staff has no further comments on the content of the Draft EIR. Thank you for the opportunity to comment. Please send copies of future Project-related documents, including electronic copies of the Final EIR, Mitigation Monitoring and Reporting Program (MMRP), Notice of Determination (NOD), CEQA Findings and, if applicable, Statement of Overriding Considerations when they become available (and refer questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at (916) 574-1310 or via e-mail at Cynthia.Herzog@slc.ca.gov). For questions concerning granted lands and the potential land exchange, please contact Reid Boggiano, in the Granted Public Trust Lands Program, at (916) 574-0450, or via e-mail at Reid.Boggiano@slc.ca.gov.

Response to Comment AS003-3

Please refer to Response to Comments AS001-2 and AS001-3.

Comment AS003-4

January 22, 2016

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on January 19, 2016. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2014061071) when contacting this office.

Response to Comment AS003-4

Thank you for your confirmation letter acknowledging and forwarding an additional comment received on the Draft EIR.

Comment AS003-5

January 19, 2016

Re: The Waterfront
SCH # 2015121076
Vic: LA-1-10, 1-405/PM 4.409
IGR#151136ME –DEIR

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Waterfront Project.

The main components of the proposed project are demolition of approximately 207,402 square feet of existing structures, replacement of the existing Pier Parking Structure, retention of 12,479 square feet of existing development, and construction of up to 511,460 square feet to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel.

Please reference our comment letter dated July 21, 2014 and consider the following comments. The comments letter has been attached for your convenience:

- The DEIR excludes a project trip assignment map and/or maps. There should be a trip assignment map referencing the study intersections depicted in figure 3.13-1. More specifically, a trip assignment map should also include the affected mainline freeways (1- 405, I-110) and the affected on/off-ramps within those routes, as identified in the draft Memorandum on the Caltrans facility analysis dated October 20, 2015.

- Mitigation was identified for affected intersections on Pacific Coast Highway at Anita/Herondo (intersection #7), PCH at Catalina Avenue (intersection # 10) and PCH at Beryl (intersection #19). However, it would be beneficial to include financial costs and funding sources and financing, including sequence and scheduling considerations, for those intersections.

- Please identify specific percentage shares for mitigation identified for PCH at Palos Verdes Drive (intersection #36) and PCH at Torrance Boulevard (intersection #26). It would also be helpful to

include financial costs and funding sources and financing, including sequence and scheduling considerations, for these locations.

If you have any questions, please feel free to contact Ms. Miya Edmonson, the project coordinator, at (213) 897-6536 should you have any questions. Please reference IGR/CEQA No. 151136ME.

Response to Comment AS003-5

Please refer to Response to Comments AS002-2 through AS002-6.

Comment AS003-6

July 21, 2014

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

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

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

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

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

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional and local modeling forecasts and with travel data.

- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project under consideration, b) cumulative traffic from all specific approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Scenarios involving different assumptions on development and growth should be considered.

- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area.

- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring.

- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Any traffic mitigation fees may be assessed proportionally with the additional traffic generated by the project. (See Caltrans' Traffic Impact Study Guide for a suggested formula).

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

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

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

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

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

Response to Comment AS003-6

Please refer to Response to Comment AS002-7.

COMMENT LETTER NO. AS004 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Comment AS004-1

First off I want to apologize for this very late response to the proposed Redondo Beach/Kings Harbor Redevelopment Project Draft Environmental Impact Report (DEIR). I want to take this opportunity to thank you for meeting with Loni Adams and giving her some very good insight into the proposed project. I completely understand that the comment period has ended but I still wanted to very briefly let you know our thoughts on the proposed project. Our comments are as follows:

Biological and Cultural Significance:
Kings Harbor marine habitats and species have been extensively researched by local scientists and as pointed out in the DEIR, they have found that there are relatively abundant and diverse fish habitats and species present some of which are state and federal fishery management plan species (e.g. groundfish and anchovies). Kings Harbor is also a popular location for recreational fishing. Additionally, Kings Harbor includes Essential Fish Habitat (EFH) and a Habitat Area of Particular Concern (marina habitat) for various federally-managed fish species pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

Response to Comment AS004-1

Thank you for your comment. The comment was submitted on February 8, 2016 after the close of the Draft EIR comment period; nevertheless, responses have been prepared as outlined below.

Comment AS004-2

Locally Unique Habitat and Species
The DEIR indicates that a small population of Broomtail grouper (Mycteroperca xenarcha), (a relatively uncommon fish species for this area), is present inside of Kings Harbor. This occurrence of the Broomtail grouper (rare in California) indicates that the fish foraging habitats and fish communities in this location are relatively stable and healthy. Additionally, the DEIR included a 2015 marine bio-survey report which indicated that other indicator species are also present within the Harbor. For example, soft corals (a long lived invertebrate species), and Giant kelp and understory kelp are also present in Kings Harbor.

Response to Comment AS004-2

Comment noted.

Comment AS004-3

Eelgrass and Kelp
The eelgrass and kelp spp. surveys conducted in 2014 and 2015 indicate that kelp is prevalent, but eelgrass was not present within the construction footprints and vicinity. Additionally, eelgrass has been observed historically in Kings Harbor. These observations and findings indicate that potential eelgrass substrate is likely present in Kings Harbor.

Response to Comment AS004-3

As noted in Section 3.3, Biological Resources in the Draft EIR (page 3.3-20), a focused survey for eelgrass was conducted and no beds were located in April 2014 or during the expanded surveys in March 2015. While impacts are not anticipated to occur to eelgrass, the City has proposed Condition of Approval (COA) BIO-4: prior to any in-water construction, the project area would be surveyed for eelgrass habitat per the Southern California Eelgrass Mitigation Policy (SCEMP). (See Draft EIR page 3.3-52 for additional details.)

Comment AS004-4

Marine Habitat Impacts:
It is our understanding that there are several alternative locations for the boat ramp portion of the project. In order to address fill and rock riprap impacts associated with this portion of the project we believe that the least impactful would be the Mole B, C or D alternatives.

If open water fill associated with the breakwater is the preferred alternative, then the FEIR should include a comprehensive discussion of an appropriate mitigation and monitoring plan that will need to be developed to address unavoidable impacts. It is our understanding that the details of the mitigation plan will be developed as a condition of other regulatory permits such as the Army Corps 404 permit and the Coastal Commission's Coastal Development permit. We look forward to participating in the development of the mitigation plan conditions that will be included in these permits.

Open Water Habitat: The Department concurs that Seaside Lagoon could be restored to compensate for the intertidal and subtidal open water fill losses where appropriate if the current lagoon area is non-jurisdictional upland area.

Response to Comment AS004-4

As detailed in Section 3.3 of the Draft EIR, per MM BIO-4: Fill in Waters of the U.S., the applicant shall comply with U.S. Army Corps of Engineers (USACE) Clean Water Act and Rivers and Harbors Act permitting requirements. Prior to issuance of construction permits for the in-water elements of the proposed project, the applicant shall demonstrate that any required permits such as Clean Water Act Section 404 permit, Section 401 Water Quality Certification, and/or Rivers and Harbors Act Section 10 permit have been obtained. If it is determined that fill of waters of the United States would result from implementation of the proposed project, authorization for such fill shall be secured through the Section 404 and/or Section 10 permitting process. The commenter incorrectly notes Mole B as a boat ramp alternative; boat ramp alternatives analyzed in the Draft EIR are associated with Mole A, C and D. Please also see Draft EIR Chapter 4, Analysis of Alternative, and specifically regarding Alternative 8 (Section 4.4.8) for the analysis of impacts associated with the different boat launch locations in King Harbor.

We acknowledge the Department concurrence that Seaside Lagoon could be restored to compensate for the intertidal and subtidal open water fill losses where appropriate if the current lagoon area is non-jurisdictional upland area. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment AS004-5

Pile Construction Activities:
It is our understanding that there is potential barotrauma impacts to marine resources as a result of pile driving which could occur during construction activities. These potential pile-driving impacts are associated with the portion of the project dealing with the construction or repair Horseshoe Pier, Sportfishing Pier, pedestrian bridge, boat ramp and marina replacement.

The Department relies on guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources, in particular for pile driving projects. The agreed upon criteria consists of sound pressure levels (SPL) of 206 dB peak and 187 dB accumulated sound exposure level (SEL) for all listed fish within a project area. Impacts to marine organisms from underwater sound are influenced by the SELs, SPLs, sound frequency, and depth and distance from the sound output source. The FEIR should include a comprehensive discussion of impacts associated with pile driving. The discussion should include the avoidance and minimization measures and best management practices that will be implemented to address these impacts.

Response to Comment AS004-5

Thank you for your comment. Section 3.3 of the Draft EIR detailed the impacts of sound transmission in the underwater environment (beginning on page 3.3-32), as well as pile-driving (beginning on page 3.3-41). As shown in Table 3.3-4, pile driving associated with the proposed project is not anticipated to result in sound levels that reach an intensity that would result in Level A (injury) with the potential to result in injury to marine mammals. However, pile driving could result in Level B (harassment) that leads to avoidance behavior by marine mammals. Therefore, per MM BIO-1: Protection of Marine Mammals During Construction, during pile-driving a Level B (harassment) safety zone shall be established around the pile-driving site and monitored for marine mammals. The Level B radius is based on the estimated safe distance for installation of piles proposed for use in the project. The safety zone varies by pile size and hammer type. Because the noise levels anticipated under this analysis are based on measured values from multiple different projects, the protective buffer has been increased by 20 percent to address inherent variability. The buffers are to be applied using direct straight-line exposure thus barriers that create an acoustic shadow (e.g., a jetty or breakwater) separating the noise generation from mammal receptors would eliminate the buffer requirement. With implementation of mitigation measure MM BIO-1, impacts to marine mammals would be less than significant.

As discussed on Draft EIR page 3.3-32, the proposed project would not include piles of sufficient size that have been known to result in fish kills or stunning. Effects of the projects pile driving activities are also discussed under Impact BIO-1, including impacts to broomtail grouper and other aquatic species of fish. The proposed project's pile driving would be performed using principally vibratory hammer for steel piles and jet and impact methods for prestressed concrete piles wherein piles would be initially jetted to within five feet of specified tip elevation using an internally cast 1-1/2" diameter jet tube in the pile's center. The last five feet of driving to set the pile to final will be achieved using an impact hammer. Should the Sportfishing Pier be replaced/reconstructed, small diameter concrete or timber piles would be impact driven. Because concrete piles for the Sportfishing Pier would be of a smaller diameter than any other concrete piles to be used, they have not been independently evaluated but can be assessed as a lesser effect than Basin 3 marina piles.

Thresholds for acoustic pressures resulting in injury to fish are based on peak SPLs of 206 dB or cumulative SEL levels of 187 dB for impact pile driving. No cumulative sound thresholds have been adopted for vibratory (continuous noise). Table 3.3-4 from the Draft EIR has been extended (below) to include the expected peak SPL and single strike SEL levels for the project piles. As indicated in the table (below), none of the pile types approach the peak SEL thresholds for fish injury potential. To reach a cumulative SEL multiple blows by impact hammer are required to raise the SEL. The formula for calculation of SEL cumulative (SEL cum) for impact pile driving is as follows:

$$\text{SEL cum} = \text{SEL} + 10*\text{Log10}(\text{daily number of blows})$$

Because impact hammering is only proposed for final setting of jetted concrete piles and potentially timber piles, should the Sportfishing Pier be replaced/reconstructed, it is not expected that the strikes will reach high counts. For concrete piles that are initially jetted, a daily blow count has been liberally assumed to be 1,000 blows. For wood pilings that cannot be jetted to near final tip elevation, a blow counts of 1,000 blows has also been assumed. These blow counts used in this analysis are believed to be high estimates counts for the construction required. Based on the formula for SEL cumulative, the SEL would be increased by up to 30 dB over the course of the construction day. This is reflected in the table below. As such, the cumulative SEL would not exceed the potential fish injury threshold and impacts would be considered less than significant. This applies to broomtail grouper as well as other fish species.

Project Element Pile Type	Pile Driving Methods	Average Sound Level (dB_{RMS}) at 10-meters[1]	Level A (190 dB_{RMS}) Distance (meters)	Level B (160 dB_{RMS}) Distance (meters)[5]	Peak SPL (206 dB peak	SEL_{cum} (187 dB)
Horseshoe Pier 18”-dia. coated steel piles	Vibratory hammer	>163 and <169[2]	No Exceedance	>12 and <16	196	NA
Pedestrian Bridge ≥18”-dia. coated steel piles	Vibratory hammer	>155 and <169[3]	No Exceedance	>3 and <16	196	NA
Sportfishing Pier ~11” dia. treated timber piles	Impact hammer	~160[4]	No Exceedance	10 meters	182	187[4]
Small Craft Boat Ramp >18” dia. prestressed concrete pile	Jetted and impact hammer to set	>166	No Exceedance	>14 meters	185	184
Basin 3 Marina 16” square prestressed concrete pile	Jetted and impact hammer to set	165-173	No Exceedance	13-18 meters	184	<184

[1] Reference sound data from Caltrans (2007 updated 2012)
[2] sound data are from bracketing pile sizes of 16-inch and 20-inch steel piles. RMS calculated by L_{eq} 1-sec for vibratory noise sources
[3] sound data are from bracketing pile sizes of 13-inch and 20-inch steel piles. RMS calculated by L_{eq} 1-sec for vibratory noise sources
[4] sound data is for 12-14” dia. piles and thus is an over-estimate of anticipated sound generation
[5] distances are calculated assuming water depth of 5 meters

Comment AS004-6

Recommendations

a) The FEIR should include a comprehensive discussion of all mitigation alternatives that will be used to offset habitat losses and shading impacts associated with the proposed Project. In addition, we recommend that the project proponent collaborate with the Department and others on appropriate mitigation alternatives.

We appreciate the opportunity to review and comment on the DEIR. As always, Department personnel are available to discuss our concerns, comments, and recommendations. Please contact Ms. Loni Adams, Environmental Scientist, at (858) 627-3985 or Loni.Adams@wildlife.ca.gov if you have any questions.

Response to Comment AS004-6

Thank you for your comment. As detailed in Section 3.3 of the Draft EIR, per COA BIO-6: Compliance with NMFS Guidelines for Overwater Structures, the proposed project shall comply with National Marine Fisheries Service (NMFS) guidelines for overwater structures and Essential Fish Habitat (EFH). Impacts associated with the potential for habitat loss (increased surface coverage/shade) were described in the Draft EIR starting on page 3.3-43. If the Sportsfishing Pier is replaced/reconstructed as part of the proposed project, mitigation

measure MM BIO-3 would be applicable, and includes Mitigation for the Increase in Surface Coverage; please see Draft EIR page 3.3-66 for additional details. The City will cooperate in any consultation process with NMFS regarding impacts to EFH; consultation would be conducted prior to implementation of the proposed project. This City will also consider CDFW comments and concerns throughout any federal and state regulatory processes.

2.3.3 Regional Government

COMMENT LETTER NO. AR001	LOS ANGELES COUNTY SANITATION DISTRICT

Comment AR001-1

June 8, 2016
Ref File No.: 3519628

Supplemental Comment Letter for The Waterfront Project

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 16,2015. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated January 19, 2016 (copies enclosed) still apply to the subject project with the following additional comment.

Response to Comment AR001-1

Thank you for your comment. See Response to Comments AR001-3 through AR001-9 below.

Comment AR001-2

2. The District can provide sewerage service to the proposed project; however, it has come to our attention that several facilities currently receiving sewerage service are not paying the correct service charge. Service charge errors must be resolved by contacting Ms. Wendy Yanez of our Financial Management Department at (562) 908-4288 extension 2713.

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

Response to Comment AR001-2

Thank you for your comments. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body. In addition, your comment regarding service charge errors will be provided to the appropriate City staff.

Comment AR001-3

January 19, 2016
Ref File No.: 3519628

Comment Letter for The Waterfront Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 16, 2015. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated July 16, 2014 (copy enclosed) still apply to the subject project with the following updated information and comments.

Response to Comment AR001-3

The information that LACSD provided in response to the NOP, were considered and presented in the Draft EIR as appropriate. As noted under Comment AR001-8 below, the District has no further comments on the content of the Draft EIR; hence, the items from the NOP were addressed.

Comment AR001-4

2. Although it was previously stated the proposed development is located within the jurisdictional boundaries of the South Bay Cities District, fut1her review of the project boundaries revealed the western portion of the project site is outside of the jurisdictional boundaries of the South Bay Cities District. There is currently no Assessor's identification number associated with the land in question. Before sewerage service can be provided to the proposed development, additional information will be necessary to determine if the land outside of the jurisdictional boundary of the South Bay Cities District will require annexation. Please contact the undersigned at (562) 908-4288, extension 2717 to resolve the matter.

Response to Comment AR001-4

The District sent an email after their January 19, 2016 letter that corrects the information in Comment AR00-4. See Response to Comment AR001-2.

Comment AR001-5

3. **SECTION 3.14.2.1 Wastewater**, page 3. 14-3, third paragraph - The Joint Water Pollution Control Plant (JWPCP) currently processes an average flow of 263.1 million gallons per day (mgd).

Response to Comment AR001-5

Comment AR001-5 provides a clarification on the average flow treated at the JWPCP. Section 3.14, Utilities in the Draft EIR assumes that the JWPCP currently processes a slightly greater amount of wastewater (263.4 mgd) than stated in Comment AR001-5 (263.1 mgd). Therefore, the average flow referenced in the Draft EIR is considered a worst-case analysis and has not been updated. The information provided in Comment AR001-5 would not constitute ‘significant new information;’ and recirculation of the EIR would not be warranted under CEQA Guidelines Section 15088.5.

Comment AR001-6

4. **SECTION 3.14.4.3.2 Impact Determination**, page 3.14-21, first paragraph - Section 3.14.4.3 .1 Proposed Project describes the proposed project as approximately 511,460 square feet of mixed- use commercial and proposes the demolition of 207,402 square feet of existing structure. Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the

proposed project is 98,819 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

Response to Comment AR001-6

Comment AR001-6 provides the estimated average wastewater flow of the proposed project based on the LACSD's mixed-use commercial wastewater generation rate. In lieu of applying the mixed-use commercial wastewater generation rate, the Draft EIR calculated wastewater demand using the LACSD's wastewater rates specific to the greatest intensity of uses that could be developed under the proposed project: restaurant, retail, office, theater, and hotel (see Table 3.14-8 on page 3.14-22 in Section 3.14, Utilities of the Draft EIR). As discussed on page 3.14-21 of the Draft EIR, a 20 percent reduction was then applied to account for compliance with water conservation requirements, which is consistent with the water supply assessment prepared by CalWater. By applying the use-specific wastewater generation rates and the 20 percent reduction, Draft EIR assumed a wastewater generation rate of 188,509 mgd, which is greater than the amount of 98,819 mgd stated in Comment AR001-6 above. Therefore, the estimated wastewater generation referenced in the Draft EIR is considered a worst-case analysis and has not been updated. The information provided in Comment AR001-6 would not constitute 'significant new information;' and recirculation of the EIR would not be warranted under CEQA Guidelines Section 15088.5.

Comment AR001-7

1. **SECTION 3.14.4.3.2 Impact Determination** , page 3.14-27, third paragraph - The JWPCP currently processes an average flow of 263.1 mgd.

Response to Comment AR001-7

See Response to Comment AR001-5 above.

Comment AR001-8

6. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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

Response to Comment AR001-8

Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment AR001-9

July 16, 2014
Ref File No.: 3012036

The Waterfront Project

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

- The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Herondo Trunk Sewer Section 1, located in Herondo Street west of Francisca Avenue. This 14.06-inch diameter lined trunk sewer has a design capacity of 2.1 million gallons per day (mgd) and conveyed a peak flow of 1.0 mgd when last measured in 2010.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.

3. The expected increase in average wastewater flow from the project site is 22,282 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table l, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts ' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

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

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

Response to Comment AR001-9

The information that LACSD provided in response to the NOP (as stated in Comment AR001-9 above), were considered and presented in the Draft EIR as appropriate. As noted under AR001-8 above, the District has no further comments on the content of the Draft EIR; hence, the items from the NOP were addressed.

Thank you for your comments. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment AR001-10

The portion of the subject project that is outside of the jurisdictional boundaries of the South Bay Cities District will not require annexation at this time.

Response to Comment AR001-10

This comment corrects information provided by the County Sanitation Districts of Los Angeles County in Comment AR001-4 below.

Comment AR001-11

January 19, 2016
Ref File No.: 3519628

Comment Letter for The Waterfront Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 16, 2015. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated July 16, 2014 (copy enclosed) still apply to the subject project with the following updated information and comments.

2. Although it was previously stated the proposed development is located within the jurisdictional boundaries of the South Bay Cities District, fut1her review of the project boundaries revealed the western portion of the project site is outside of the jurisdictional boundaries of the South Bay Cities District. There is currently no Assessor's identification number associated with the land in question. Before sewerage service can be provided to the proposed development, additional information will be necessary to determine if the land outside of the jurisdictional boundary of the South Bay Cities District will require annexation. Please contact the undersigned at (562) 908-4288, extension 2717 to resolve the matter.

3. **SECTION 3.14.2.1 Wastewater**, page 3. 14-3, third paragraph - The Joint Water Pollution Control Plant (JWPCP) currently processes an average flow of 263.1 million gallons per day (mgd).

4. **SECTION 3.14.4.3.2 Impact Determination**, page 3.14-21, first paragraph - Section 3.14.4.3 .1 Proposed Project describes the proposed project as approximately 511,460 square feet of mixed- use commercial and proposes the demolition of 207,402 square feet of existing structure. Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the proposed project is 98,819 gallons per day. For a copy of the Districts' average wastewater generation

factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. **SECTION 3.14.4.3.2 Impact Determination** , page 3.14-27, third paragraph - The JWPCP currently processes an average flow of 263.1 mgd.

6. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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

Response to Comment AR001-11

Please refer to Responses to Comments AR001-3 to AR001-8 above.

Comment AR001-12

July 16, 2014
Ref File No.: 3012036

The Waterfront Project

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

- The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Herondo Trunk Sewer Section 1, located in Herondo Street west of Francisca Avenue. This 14.06-inch diameter lined trunk sewer has a design capacity of 2.1 million gallons per day (mgd) and conveyed a peak flow of 1.0 mgd when last measured in 2010.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.

3. The expected increase in average wastewater flow from the project site is 22,282 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table l, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts ' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer

Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

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

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

Response to Comment AR001-12

Thank you for your comment. See Response to Comment AR001-9 above.

Comment AR001-13

Attached please find a pdf copy of the subject project comment letter. The original was placed in the mail to your attention.

Response to Comment AR001-13

Thank you for your comment. The letter was received via email (Comment AR001-14 and 15 below) and by mail (Comment AR001-11 and 12 above).

Comment AR001-14

January 19, 2016
Ref File No.: 3519628

Comment Letter for The Waterfront Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 16, 2015. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated July 16, 2014 (copy enclosed) still apply to the subject project with the following updated information and comments.

2. Although it was previously stated the proposed development is located within the jurisdictional boundaries of the South Bay Cities District, fut1her review of the project boundaries revealed the western portion of the project site is outside of the jurisdictional boundaries of the South Bay Cities District. There is currently no Assessor's identification number associated with the land in question. Before sewerage service can be provided to the proposed development, additional information will be

necessary to determine if the land outside of the jurisdictional boundary of the South Bay Cities District will require annexation. Please contact the undersigned at
(562) 908-4288, extension 2717 to resolve the matter.

3. **SECTION 3.14.2.1 Wastewater**, page 3. 14-3, third paragraph - The Joint Water Pollution Control Plant (JWPCP) currently processes an average flow of 263.1 million gallons per day (mgd).

4. **SECTION 3.14.4.3.2 Impact Determination**, page 3.14-21, first paragraph - Section 3.14.4.3 .1 Proposed Project describes the proposed project as approximately 511,460 square feet of mixed- use commercial and proposes the demolition of 207,402 square feet of existing structure. Based on the Districts' average wastewater generation factors, the expected average wastewater flow from the proposed project is 98,819 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. **SECTION 3.14.4.3.2 Impact Determination** , page 3.14-27, third paragraph - The JWPCP currently processes an average flow of 263.1 mgd.

6. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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

July 16, 2014
Ref File No.: 3012036

The Waterfront Project

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

- The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Herondo Trunk Sewer Section 1, located in Herondo Street west of Francisca Avenue. This 14.06-inch diameter lined trunk sewer has a design capacity of 2.1 million gallons per day (mgd) and conveyed a peak flow of 1.0 mgd when last measured in 2010.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.

3. The expected increase in average wastewater flow from the project site is 22,282 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table l, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts ' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

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

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

Response to Comment AR001-14

This is an earlier version of the same letter provided under Comments AR001-11 and 12 above.

2.3.4 Local Government

COMMENT LETTER NO. AL001 CITY OF HERMOSA BEACH

Comment AL001-1

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

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

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

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

Response to Comment AL001-1

The commenter has provided a summary of the individual comments, which are detailed in AL001-2 through AL001-24 below. The comment letter was submitted by City of Hermosa Beach Staff and "went out without coming to the [City] Council in draft form." (City of Hermosa Beach, January 26, 2016 City Council meeting, Item 16-0092, 1 hr, 54 minutes): http://hermosabeach.granicus.com/MediaPlayer.php?view_id=6&clip_id=4046.)

Comment AL001-2

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

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

Response to Comment AL001-2

The comment first asserts that the cumulative analysis should consider a reasonably foreseeable development for the adjacent AES owned property; however, the comment does not provide any details on the type of development they consider to be reasonably foreseeable for the AES site. Please see Master Response #1: AES

Power Plant Site and Master Response #2: Cumulative Analysis. As detailed therein, over the past six years, the AES site has been the subject of three initiative measures, identified as a potential site for a desalination facility, and the property owner has initiated and then reinitiated an application with the California Energy Commission to construct a power plant. At this juncture, development on the AES site is considered speculative. Furthermore, the City of Hermosa Beach, in its own certified Environmental Impact Report (certified on July 8, 2014),[22] stated that the AES property would remain a power plant ("RBEP" Redondo Beach Energy project),[23] and then went on to substantively utilize the CMP growth projections for its cumulative analysis, rather than a list of projects approach. (See Response to Comment AL001-12 for additional details.)

Comment AL001-3

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

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

Response to Comment AL001-3

On Draft EIR page 3.2-23, the City noted that it utilized the CalEEMod computer model; links to this model and the user guide were provided on Draft EIR page 3.2-22. The VMT commute distances used for modeling air quality were conservatively based upon the default commute distances provided in the CalEEMod model for the project area. These are 8.4 miles per trip for the commercial-customer trip (people that would use the services of the retail establishments); 16.6 miles for commercial-work trips (those employed at the location); and 6.9 miles for commercial-nonwork trips (trips that are not associated with the use or employment of the land use such as deliveries). The default modeling distances were used as it is a conservative estimate of distances anticipated for the project area. Based on the percentage of trips associated with each trip type, the effective average VMT modeled for the project is 9.09 miles per trip. This is an increase of approximately 14 percent above that used by the Traffic Study and therefore considered conservative.[24] The traffic study provides more accurate values based upon the project specific factors, therefore the emissions estimated in the air quality section are considered conservative. Even with adjusting the emissions for the VMT of eight miles per trip, the significance findings for the project would not change. These calculations are also considered conservative given the City's Market Feasibility Analysis Study, which concluded that the majority of worker and visitor living within an eight to nine mile radius. (Draft EIR Section 3.13.4.1.1.) Additionally, as shown in Figures 4 and 5 of the AECOM study (Appendix O of the Draft EIR), the primary areas associated with residents from the site is approximately 3.5 miles (Figure 4) and about 1.5 miles for employees (Figure 5); therefore, the market area could be even smaller than assumed for the traffic and air quality analysis. This methodology was expressly upheld by the Court of Appeal in *Coalition for Preservation of Arroyo v. City of Pasadena* (2015) Case No. B255824:

> The Coalition further maintains that the City failed to accurately estimate travel distances of event visitors in evaluating air quality impacts. The EIR estimated that patrons' average vehicle trip length to

[22] At the time the Hermosa Beach EIR was certified, Initiative Measure A had been proposed for the AES property.

[23] City of Hermosa Beach E&B Final EIR, Section 3.1.2: http://www.hermosabch.org/modules/showdocument.aspx?documentid=4313

[24] Utilizing the transportation analysis VMT rates, which the City believes to be more accurate, would reduce project emissions as follows: ROG from 20.69 to 18.47; NOx from 8.42 to 7.98; CO from 55.74 to 48.34; SOx from 0.32 to 0.28; PM_{10} from 16.63 to 14.28 and $PM_{2.5}$ from 4.71 to 4.08.

the Rose Bowl for attendance of the NFL games would be 45 minutes long. The EIR reasoned that this trip length represented a reasonable average trip length for football fans in the Los Angeles area based on default factors from CalEEMod (an emissions calculations model). The South Coast Air Quality Management District, which is the air pollution control agency for urban Los Angeles County, specifically suggested the City utilize CalEEMod to estimate emissions. [¶]The Coalition provides no evidence that the City erred in calculating the average trip length. As no local trip length data existed for NFL games and as the pertinent air pollution control agency recommended the CalEEMod model, we conclude that the City's choice of methodology regarding the trip distance was also reasonable and supported by substantial evidence.

Comment AL001-4

Biology
The "soft start" to pile driving activities called for in MM BI0-1, intended to induce marine mammals to relocate, would seem to qualify as harassment under the Marine Mammal Act.

Response to Comment AL001-4

Section 3.3, Biological Resources of the Draft EIR detailed the impacts of sound transmission in the underwater environment (beginning on page 3.3-32), as well as pile-driving (beginning on page 3.3-41). As shown in Table 3.3-4, pile driving associated with the proposed project is not anticipated to result in sound levels that reach an intensity that would result in Level A (injury) with the potential to result in injury to marine mammals. However, as detailed in the Draft EIR, pile driving could result in Level B (harassment) that leads to avoidance behavior by marine mammals. Therefore, per MM BIO-1: Protection of Marine Mammals During Construction, during pile-driving a Level B (harassment) safety zone shall be established around the pile-driving site and monitored for marine mammals. The Level B radius is based on the estimated safe distance for installation of piles proposed for use in the project. The safety zone varies by pile size and hammer type. Because the noise levels anticipated under this analysis are based on measured values from multiple different projects, the protective buffer has been increased by 20 percent to address inherent variability. The buffers are to be applied using direct straight line exposure thus barriers that create an acoustic shadow (e.g., a jetty or breakwater) separating the noise generation from mammal receptors would eliminate the buffer requirement. Further, a qualified marine mammal observer would survey the safety zone prior to and during pile driving activities to ensure that such activities do not begin, or if already begun do not continue, if marine mammals are detected within the safety zone. The safety zones required by MM BIO-1 would be adequate to avoid Level B harassment under NOAA's Interim Sound Threshold Guidance[25] for marine mammals. With implementation of mitigation measure MM BIO-1, impacts would be less than significant.

Comment AL001-5

MM BI0-2 is self-contradictory, or ambiguous at the very least, in requiring in its first sentence that construction under Horseshoe Pier that could disturb the sandy beach be scheduled outside the grunion spawning season, then goes on to undo that requirement by prescribing procedures to be implemented "if construction overlaps the grunion spawning season".

[25] See: http://www.westcoast.fisheries.noaa.gov/protected_species/marine_mammals/threshold_guidance.html

Response to Comment AL001-5

As noted in the mitigation measures, the typical grunion spawning season occurs from (March to August). Consequently, mitigation measure MM BIO-2 provides the developer with the typical timeframe to plan their construction schedule around. These schedules must be prepared months in advance for a construction project as complicated as the proposed project; however, on complex projects that involve the coordination and integration of several aspects of construction occurring on an interdependent basis or in cases where construction requires specialized equipment/crews, there can be times when the precise scheduling of specific construction activities has to be modified within the context of the overall construction program. Examples include, but are not limited to, situations when certain predecessor construction activities don't start or end at the scheduled time, specialized construction equipment breaking down during the job or being unexpectedly out of service when needed, specialized subcontractors not being at the project site when planned due to other previously scheduled construction projects taking longer than expected, and the like. Mitigation measure MM BIO-2 sets forth for the project developed the time period when certain construction activities should be avoided, but also provides the developer with contingency measures to be implemented in the unlikely event that such scheduling cannot be achieved, and such measures provide additional assurance that potential significant impacts to grunion will be sufficiently addressed. To clarify the intent and structure of the MM BIO-2, it has been modified as follows:

MM BIO-2: California Grunion

Horseshoe Pier construction that could disturb the sandy beach under the pier structure shall be scheduled outside of the grunion spawning season (March to August), unless the applicant fulfills the following procedures:

If construction overlaps the grunion spawning season, grunion monitoring shall be conducted prior to any sandy beach-disturbing activity (check California Department of Fish and Wildlife [CDFW] website for spawning events as spawning events occur bi-weekly). If no grunion are observed, construction may proceed. If spawning occurs within the work area and is of a Walker Scale[26] 2 or higher, work shall not be performed if it would disrupt the high spawning beach used by grunion. Work shall be deferred until after the next spring tide series when eggs would be expected to hatch and larval fish would return to the water. However, construction can continue where work would not overlap with grunion spawning locations.

Comment AL001-6

The Draft EIR should discuss the consistency of Condition of Approval BIO-3 with the Marine Mammal Act and its potential to result in adverse environmental impacts. This condition does not appear to be intended to avoid or mitigate impacts to pinnipeds, but rather to manage their impacts on the proposed project's uses. It may adversely affect wildlife, especially with such implementing actions as "reduce or eliminate existing colonial haul-outs inside King Harbor".

[26] The Walker Scale for assessment of California Grunion (*Leuresthes tenuis*) spawning runs, developed by K. Martin, M. Schaadt and S. Lawrenz-Miller, is named for Boyd Walker, whose pioneering research provided the scientific basis for understanding the periodicity of *L. tenuis* spawning runs in California. Scale increases exponentially with greater numbers of fish, greater area involved, and increased duration of the run.

Response to Comment AL001-6

As detailed in Section 3.3, Biological Resources of the Draft EIR (beginning on page 3.3-45), it is not anticipated that sea lions would use the beach at the modified Seaside Lagoon as a haul out in substantial numbers. However, whether the project elements, such as the opening of the lagoon, would directly affect sea lion haul-out preferences or increase public-pinniped interactions, this would not result in a substantial change in the level of human-pinniped interactions in comparison to existing conditions, such that there would be a substantial adverse impact on pinnipeds. Therefore, while impacts of the proposed project are less than significant, the intent of Condition of Approval (COA)[27] BIO-3, Marine Mammal Management Program, is to prepare and implement a marine mammal management program that is consistent with the requirements of the Marine Mammal Protection Act, prior to the opening of Seaside Lagoon to harbor waters. COA BIO-3 specifically states (under Item 2) that the City under section 109(h)(1)(B) of the Marine Mammal Act, has the authority to take marine mammals for the purpose of protection of public health and welfare. COA BIO-3 continues by establishing marine mammal controls common to those recommended by the National Marine Fisheries Service and involving marine mammal rescue organizations, as appropriate. As to the commenter's statement that this COA may adversely affect wildlife, especially with such implementing actions as "reduce or eliminate existing colonial haul-outs inside King Harbor," this is one of several (but not limited to, per the COA) marine mammal controls, and the commenter provides no indication of what, if any, other wildlife may be adversely affected by this measure. It should also be noted that Seaside Lagoon is not currently used as a haul-out by pinnipeds under existing conditions, (it is not currently linked to the harbor), consequently, its non-use by pinnipeds would not be considered a significant impact under CEQA (which is based upon a comparison to existing conditions). (CEQA Guidelines § 15125(a) and 15126.2(a).) Although this impact would be less than significant, as discussed above, COA BIO-3 would ensure compliance with the Marine Mammal Protection Act.

Comment AL001-7

Geology and Soils

The Draft EIR should address the potential for the project to induce offshore subsidence as well as the potential for the proposed new uses and adjacent areas to be subject to the effects of offshore subsidence. The Draft EIR limits its discussion of subsidence potential to onshore subsidence, despite the history of subsidence in the immediate vicinity offshore. According to prior studies, the King Harbor Breakwater settled approximately five feet between 1955 and 1985. Design of the breakwater and existing harbor facilities apparently did not take into account evidence of subsidence, although adverse effects of regional subsidence and local differential settlement on the long-term performance of the breakwater and inner harbor structures were predictable, based on data existing at the time of their construction (Eiwany et al. 2006)[28]. Five feet of settlement of the breakwater with no evidence of similar amounts of settlement and attendant structural damage throughout the adjacent coastal areas suggests localized settlement due to improper construction rather than regional subsidence.

The Draft EIR should discuss the potential for offshore landslides to be induced by project construction. The report limits its discussion of landslide potential to onshore geologic conditions. As indicated in the Hydrology

[27] The Draft EIR has proposed both mitigation measures to reduce or avoid significant impacts, and has also proposed Conditions of Approval as part of the City's planning process. As discussed in the Draft EIR Biological Resource chapter "While impacts are less than significant without mitigation, the City is proposing the following Condition of Approvals as part of its Conditional Use Permit procedures." Consequently, COA BIO-1 referenced in the comment, is not a mitigation measure, as implied in the comment.

[28] Elwany, H.R., Dill, J.J., and Marshall, N. 2006. Subsidence of King Harbor Breakwater at Redondo Beach. Proceedings of International Conference on Coastal Engineering. ASCE. 8 pp. King Harbor,http://coastalenvironments.com/pdf/11_kinqharborbreakwater_icce06.pdf

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

Response to Comment AL001-7

Discussion of subsidence was provided through Chapter 3.5 of the Waterfront Draft EIR, including Impact GEO-3. The comment first asserts that the EIR should look at the "potential for the proposed new uses and adjacent areas to be subject to the effects of offshore subsidence." CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392.) Furthermore, implementation of the proposed project would result in improvements in comparison to existing conditions. As discussed on Draft EIR page 3.5-28:

> With the exception of the more modern Kincaid's building and a restroom/shower building at Seaside Lagoon, the proposed project would replace the older non-compliance buildings/structures through the project site with new facilities that comply with current applicable building codes. The existing buildings were built from the 1950s to 1980s. Although various building improvements have occurred over the years, these buildings were not constructed to the current and stricter CBC standards. In addition, a majority of the buildings located on the southern section of the Horseshoe Pier are built over the 1928 portion of the pier [the underlying Horseshoe Pier would be replaced as part of the proposed project]….Once the pier has been upgraded to current CBC standards/requirements, buildings would be constructed that would also comply with current building codes.

Furthermore, the project would not induce an offshore landslide or result in increased subsidence. King Harbor's North Breakwater was raised to a crest elevation of +22 feet between Mole A and its first 3,600 feet of length in 1964. The remaining 1,600 feet of breakwater length to the end was left at its original 1958 crest height of +14 feet MLLW. The breakwater has experienced a number of damaging storms including the 1983 and 1988 events. Condition surveys of the breakwater conducted after 1985 indicated that the crest elevations of the two sections varied from about +19 to +22 and +10 to +12 feet MLLW, respectively. Before the breakwater was renovated in the early 1990s, the lower section was damaged from storms. After the 1988 storm, the low breakwater section was severely damaged.

The U.S. Army Corps of Engineers (USACE) reviewed subsidence at King Harbor in more depth as part of their design study for raising the Outer Harbor Breakwater.[29] Studies indicated that structures in the Harbor have subsided about 1.5 feet between 1975 and 1989. Surveys of one benchmark located in Redondo Beach showed a subsidence between 1945 to 1989 of about 2.1 feet. Possible causes of the settlement were reviewed including settlement of fills and foundations, consolidation of sediments, decomposition of subsurface organic

[29] Department of the Army, 1989. General Design Memorandum No. 3, Storm Damage Reduction for King Harbor (Redondo Beach), draft report, November 1989.

material, slope failures, petroleum withdrawal, groundwater withdrawal, sea level changes, and tectonic deformation. It was concluded that petroleum withdrawal from the Torrance Oil Field was the most likely cause of the subsidence. As described in Section 3.7, Hazards and Hazardous Materials of the Draft EIR, the project site is located entirely within the Torrance Oil Field, while King Harbor is located at the northwest end of the Torrance Oil Field. Production of the 2,000 to 4,000 foot deep deposit began in 1922. Water injection to offset the effects of subsidence started in 1970 although no injection has been performed in the King Harbor vicinity. The USACE concluded that the average subsidence rate of 0.1 feet per year may continue for a few years after their 1989 assessment. Water injection or a cessation of production was estimated to suppress the ground lowering. The uniformity and constant rate of ground settlement that has occurred historically indicates that consolidation of the local soil conditions (as suggested by Elwany) is not the cause of the subsidence.

The Elwany et al paper referenced by the commenter references vibracore and sub-bottom profiling data obtained in 1996 as the basis for their conclusions. However, the paper does not offer sufficient analysis and backup to support their contention that the area has experienced gross subsidence over time. The 1988 storm damage was not the result of subsidence. It was the result of a too low breakwater crest that was subjected to a very severe January 1988 storm swell.

As the breakwater and the piers at the entrance of Basin 3 are within Waters of the US, it would be designed to meet USACE standards and standard engineering requirements, which would consider the site conditions, including potential for subsidence. Additionally, as discussed in Draft EIR Chapter 3.5, Geology and Soils, the design- and project-specific geotechnical evaluation(s), engineering analysis and plans submitted to the City's Building and Safety Division during the design phase would include recommendations and specific conditions that are project site-specific. As part of the Conditional Use Permit process, the City is proposing Conditions of Approval, which would require, prior to the issuance of building permits, the City's Building and Safety Division to incorporate the recommendation and conditions from the design and project-specific geotechnical evaluation(s), engineering analysis, and any additional recommendations that come out of this review. (See COA GEO-1 through GEO-3.) This would include consideration and engineering design to address the potential for subsidence. This process is consistent with the development process for all projects in the City, wherein, final engineering designs are provided for City review to ensure compliance with geotechnical requirements and building codes.

Installation of piles associated with waterside construction (e.g., piers, docks/gangways, bridge piles, and the ramp) may be implemented using traditional pile driving, pile jetting, or a combination of the two. Pile jetting utilizes a carefully directed and pressurized flow of water to assist in pile placement. The application of a concentrated jet of water at the pile tip disturbs a ring of sub-grade soils directly beneath it. The jetting technique liquefies the soils at the pile tip during pile placement, reducing the friction and interlocking between adjacent sub-grade soil particles around the water jet. This greatly decreases the bearing capacity of the soils below the pile tip, causing the pile to descend toward its final tip elevation with much less soil resistance, largely under its own weight. If the jetting technique were used, a hammer or traditional pile driver would be used to finish the last five feet of pile setting. Whether traditional, jetting or a combination of both is used, the placement of the piles have a small/localized area of soil disturbance and would not result in offshore landslides or subsidence. As for the proposed breakwater at Mole C (for the boat ramp), there would be no pile driving associated with its construction. The breakwater would be constructed using a clamshell crane on a derrick barge loaded with rocks. The crane would place each rock starting with the ones on the harbor bottom and building up the breakwater (from bottom upwards). No soil disturbance that would result in offshore landslides would occur.

Offshore subsidence or landsides referenced in the comment are caused by significant ground or very deep-seated acceleration (such as from an earthquake), and not from the proposed pile driving activities associated

with the nearshore project elements, which are localized. It is also noted that the existing pier piles have been maintained over the years (most recently by the jetting process described above) and there is no evidence of offshore subsidence or landsides due to the waterside activity to maintain them. In fact, in the early 1990s, after the 1988 fire destroyed the northern and center portions of the Horseshoe Pier, the damaged portions of the pier (about three fourths of the pier) were reconstructed with a concrete deck. The rebuilding of the damaged portion of the pier included numerous 20-inch diameter precast prestressed concrete piles set by traditional pile driving. No evidence of offshore landslides due to this extensive pile driving effort was found.

Pile driving produces ground vibrations in the form of waves of energy that travel away from the pile. As much as 70 percent of the pile driving energy is transferred to the soil, but the energy rapidly dissipates with distance from the source. Although pile driving can produce minor ground vibrations locally, hundreds of pile blows are necessary before visible signs of minor structural damage to building walls or other improvements are observed. Studies have shown that the ground vibrations fall well below levels capable of causing minor wall cracks in buildings within tens to hundreds of feet from where piles are being driven.30 Consequently, the relatively shallow depth localized low energy and ground vibrations generated during pile driving are incapable of triggering submarine slope failures. In addition, as discussed in Borrero et al, 2005,31 regarding submarine landslides in the context of their potential for tsunami generation in the Southern California Bight, the paper suggests that a significant earthquake on the order of Magnitude 7 or higher is minimally needed to induce underwater slope failures within the Southern California offshore region. Earthquakes of this severity are rare occurrences. When they do happen, significant energy is released miles below the earth's surface, and the subsequent ground acceleration motions associated with the shaking propagate for miles from the source. This deep-seated phenomenon is many orders of magnitude greater in energy and influence than any pile driving activity could generate further demonstrating that the proposed pile driving activity at the project site will not cause submarine landslide.

Comment AL001-8

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

Response to Comment AL001-8

VMT assumptions for the project's Greenhouse Gas Emissions modeling are the same as those used for the air quality modeling, as discussed in Comment AL001-3 above, the analysis used the default trip distances provided in the CalEEMod model to determine a conservative project VMT. Please see Response to Comment AL001-3 above for a detailed discussion of the VMT assumptions used for modeling purposes.

Comment AL001-9

Hydrology & Water Quality
The Draft EIR asserts that the project (both construction and operation) "would not further contribute to degradation of water quality" (Draft EIR, Page 3.8-1). This claim seems unrealistic, given the scale and complexity of the project and its location at the edge of an impaired water body. The impacts assessment appears to rely on the assumption that compliance with LID and MS4 requirements, and implementation of BMPs and a storm water pollution prevention plan (SWPPP) during construction, equate to "no degradation of

[30] Marr, W.A., 2016: https://www.geocomp.com/files/technical_papers/DealingwithVibration&NoisefromPileDriving_Adapted_PAPER_WEB.pdf
[31] Borrero et al, 2005: http://www.usc.edu/dept/tsunamis/2005/pdf/GRL_tsunami.pdf

water quality". The Santa Monica Bay's long-standing impaired status indicates that these existing regulations and management measures, although they reduce adverse effects, are not sufficient to prevent water quality degradation. The claim that the project over its lifetime will not contribute to water quality degradation is especially questionable given the 'zero trash' threshold established by the offshore debris TMDL for the Santa Monica Bay Watershed Management Area (Draft EIR, page 3.8-9, penultimate paragraph). A more realistic impacts assessment would be one that identifies the unavoidability of adverse water quality effects of such a project, while also committing to the highest level of avoidance and mitigation feasible.

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

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

Response to Comment AL001-9

The commenter states “the claim that the project over its lifetime will not contribute to water quality degradation is especially questionable given the ‘zero trash’ threshold established by the offshore debris TMDL for the Santa Monica Bay Watershed Management Area…a more realistic impacts assessment would be one that identifies the unavoidability of adverse water quality effects…”

This comment inappropriately reaches a significant impact conclusion based upon a misunderstanding of the methodological requirements of CEQA, which are based upon a comparison of changes to the *existing physical conditions caused by the project*, not based upon conditions with “zero trash.” (CEQA Guidelines Section 15125(a), 15126.2(a) [“An EIR shall identify and focus on the significant environmental effects of the proposed project…the Lead Agency shall normally limit its examination to changes in the existing physical conditions in the affected area as they existing at the time the notice of preparation is published.”].) The commenter implies that it is the job of the proposed project to improve the Santa Monica Bay water quality to meet regulatory TMDL standards; this is beyond the scope of the CEQA analysis. It is not the responsibility of the EIR to “fix” or mitigate existing conditions, which are part of the project baseline. (See *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal. App. 4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope.”].)

Comment AL001-9 implies that as Santa Monica Bay is currently an impaired water body, existing regulations and management measures are not sufficient to prevent water quality degradation. However, as described throughout Section 3.8, relatively recent and more stringent regulations governing stormwater runoff are currently in place. Thus, water quality degradation that has occurred in the past under a less stringent regulatory framework is not a reliable indicator that the proposed project would degrade water quality and the commenter provides no scientific basis for assertions that impacts to water quality would be worse than those evaluated in the Draft EIR. According to the URBAN COAST Special Issue: State of the Bay Volume 5 Issue 1 December 2015:

> Santa Monica Bay is markedly cleaner today than it was 30 years ago, demonstrated most prominently by the steady decrease of pollutant loadings to the Bay from the two major publicly owned treatment works (POTWs), and by the recovery of marine life and habitat around the outfalls of these POTWs in the Bay. (Page 11.)

Also noted in this volume:

> Improving water quality along our world-famous coast is a very high priority, and there is clear evidence that our beaches are cleaner, with less trash and bacterial contamination. This is largely due to the diversion of dry weather runoff, zero-trash TMDL implementation, and decreased rainfall. Much of this work is in response to the adoption and implementation of 14 Total Maximum Daily Loads (TMDLs), which limit pollutant loading and toxicity to surface waters in the Santa Monica Bay watershed (Section 1.2). Ongoing efforts to improve the water quality from sewage outfalls is resulting in less contamination on the Bay's soft-bottom habitat, improving the health of local fish and protecting public health. (Page 167.)

Based on the State of the Bay analysis of the environmental conditions of Santa Monica Bay 2010 (http://www.smbrc.ca.gov/docs/sotb_report.pdf):

> Efforts to improve beach water quality began in the late 1980s. The City of Los Angeles began major sewer upgrades under court order and in response to public outcry about the frequent sewage overflows and spills that affected the Bay's beaches. The resulting improvements increased sewage storage and treatment capacity, retrofitted aged sewer lines, and included more frequent sewer line inspections and cleanings. Together, these actions have contributed to a decrease in the number of sewage spills by more than 400% over the last eight years (see Figure 2-4). The Cities of Santa Monica and Los Angeles also constructed the region's first low-flow diversion from the Pico-Kenter drain in response to results of studies that detected human pathogens in two storm drains, including Pico-Kenter (Santa Monica Bay Restoration Project (SMBRP), 1990; 1991; 1992). Low-flow diversions are placed in storm drains to reroute dry weather runoff to a treatment facility in order to prevent contaminated runoff from reaching the beach …. Since 1999, various beach cities and Los Angeles County have installed many more low-flow diversions, removing a major pathway through which contaminants reach the Bay's beaches (see Figure 2-5). As a result, most Santa Monica Bay beaches continue to have low enough numbers of indicator bacteria to be considered safe for swimming and surfing during the dry weather months (April to October), according to the Beach Report Card

issued by the local environmental group, Heal the Bay (see Figure 2-6). Beach water quality is likely to further improve in the coming years since a new treatment facility and eight year-round, dry weather runoff diversions are scheduled to begin operating in 2010.

As described throughout Section 3.8, Hydrology and Water Quality of the Draft EIR, the impervious surface area would not increase (conversely it would decrease under the proposed project) and existing storm drain system would be upgraded from what is currently existing on-site to comply with current regulations, which are much more stringent than the regulations in place when the original system was implemented and would include implementation of best management practices (BMPs) and low impact development requirements. Even without these operational regulatory improvements, operational water quality impacts would be less than significant under Impact HWQ-1 due to the reduction in impervious surfaces, which reduces the amount of polluted runoff into the Harbor in comparison to baseline conditions. Additionally, as described in Section 3.14, Utilities of the Draft EIR, the existing on-site sanitary sewer system is deteriorating, raising the risk of wastewater overflows, which would negatively impact stormwater quality. The aging sewer system would be replaced with a new system under the proposed project, thereby eliminating the risk of sewage overflows as result of the aging infrastructure. In addition, restaurants at the project site would be required to comply with the City's Fats, Oils, and Grease (FOG) control and inspection program (Draft EIR page 3.8-51) to ensure the FOG removal systems are being properly maintained, thereby reducing the potential for accumulation of fats, oils, and grease in the sewer system to cause overflows as described in Section 3.8.4.3.1 of the Draft EIR.

The comment also asserts "that the text cites infiltration as the 'preferred method for managing runoff generated onsite, but notes that 'future geotechnical studies would be required to determine if this is feasible…Both feasibility of mitigation methods and performance standards must be established in order to assert that impacts are effectively mitigated." As detailed in Draft EIR Section 3.8.3, any new development similar to the proposed project is subject to numerous water quality regulatory requirements, including the MS4 permit requirement to "Retain 0.75 inch, 24 hour rain event on-site or the 85 percentile, 24-hour rain event on-site, whichever is greater." (Draft EIR page 3.8-48.) (See also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.]; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [In the Bowman case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant "…even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense"]; *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 795-796 [Rejecting water quality BMP deferral argument.].) As outlined in Draft EIR Section 3.8.3, the City has numerous regulatory controls to ensure that the water quality improvements are implemented subject to detailed performance standards.

As described in Section 3.8 of the Draft EIR, the County storm drains route off-site flows across the northern portion of the project site and outlet into the harbor. The drains do not collect any storm water from the project site. The proposed project would reroute a portion of the drains on the project site to accommodate building construction, and the rerouted segment would reconnect just upstream of the existing discharge locations into the harbor. No other alterations to the drains or outlets would occur as part of the proposed project. Providing a filtration system for County-owned and operated storm drains is not under the City's purview. However, should the County decide to make improvements to the drains in association with the proposed rerouting, the City would cooperate with the County as appropriate in this effort.

Comment AL001-10

Noise

It is not clear from the Draft EIR if modelled roadway noise increases shown in Table 3.10-11 take into account the higher noise generated by trucks in the project's construction traffic mix (especially since trucks are

converted to passenger car equivalents when estimating traffic volume). Please clarify that truck noise is considered in the projections.

Response to Comment AL001-10

The construction traffic noise impact estimates provided in Table 3.10-11 in Section 3.10, Noise of the Draft EIR are based on traffic volumes, which, as the commenter noted, include the conversion of truck trips to passenger car equivalent trips. As described on page 3.13-51 of the Draft EIR and reflected in Table 3.13-12 presented on the page following that description, each truck trip was multiplied by a factor of 2.5 to provide the passenger car equivalents. As indicated on page 3.10-35 of the Draft EIR, the construction noise impacts analysis is based on a very conservative assumption that the total 1,895 peak construction trips associated with the project would occur on any one of the street segments delineated in Table 3.10-11. Even with that very conservative assumption, the resultant increase in roadway noise levels on any, and all, of the segments evaluated would be well below the threshold of significance (see Table 3.10-11). As such, the multiple layers of conservative assumptions incorporated into the construction traffic noise impact analysis are considered to more than compensate for higher noise levels associated with individual trucks. As also demonstrated in Draft EIR Table 3.13-12, there is almost a five (5)-fold decrease in the number of trips during project construction in comparison to existing conditions. (1,895 construction related PCE vehicle trips in comparison to the 9,684 existing vehicle trips from current operations).

Comment AL001-11

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

Response to Comment AL001-11

Herondo Street at Pacific Coast Highway has been added to Table 3.10-11: Roadway Noise Level Increases Due to Project Construction-Related Traffic and Table 3.10-12: Roadway Noise Level Changes Due to Future Cumulative Traffic. Although not requested in the comment, Herondo Street was also added to Table 3.10-9: Roadway Noise Level Changes Due to Project Operations-Related Traffic. The subject tables, as revised to add Herondo Street, are presented below and in Chapter 3, Modifications to the Draft EIR, within this Final EIR. As indicated in each of the three tables, construction-related and operational traffic associated with the proposed project would not result in a significant noise impact.

Artesia Boulevard east of Prospect Avenue (located approximately two miles away from the project site) has been added to Tables 3.10-9 , 3.10-11, and 3.10-12 and, as indicated in those tables below, no significant traffic noise impacts were identified. This approach is consistent with CEQA Guidelines Section 15204(a), which notes “reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as…the severity of its likely environmental impacts….CEQA does not require a lead agency to conduct every test or perform all research, study and experimentation recommended or demanded by commentors.” Please see Response to Comment PC224-4 for additional discussion regarding the selection of the geographic scope for the noise analysis.

Table 3.10-9: Roadway Noise Level Changes Due to Project Operations-Related Traffic

Roadway	Nearest Noise Monitoring Location[1]	Estimated Existing CNEL (dBA)[2]	Existing ADT[3]	Existing + Project ADT[4]	Project-Related Change in CNEL (dB)[5]	Significance threshold in CNEL (dB)[6]	Does Project Increase Exceed Allowable Increase?
Beryl St. east of Harbor Dr. (between Project Site and Catalina Ave.)	1	58	12,867	11,656	-0.4	3	No
Harbor Dr. south of Portofino Way[7]	1	58	7,263	12,330	+2.3	3	No
Torrance Blvd. between Project Site and Catalina Ave.	7	60	5,869	16,083	+4.4	2	***Yes***
Torrance Blvd. between Catalina Ave. and Francisca	7	60	22,616	23,573	+0.2	2	No
Catalina Ave. north of Beryl St.	8	61	18,340	20,440	+0.5	2	No
Catalina Ave. south of Beryl St.	9	67	19,683	17,182	-0.6	1	No
Pacific Coast Highway north of Herondo St.	11	71	52,500[8]	54,000	+0.1	1	No
Herondo St. east of Pacific Coast Highway	10	67	17,011	18,478	+0.4	1	No
Herondo St. west of Pacific Coast Highway	10	67	14,333	15,766	+0.4	1	No
Artesia Blvd. east of Prospect Ave.	12	69	24,544[9]	24,700[10]	+0.03	1	No

Source: CDM Smith, 2015

Notes:

1. See Figures 3.10-1a and 3.10-1b

2. See Table 3.10-2

3. ADT – Average Daily Traffic

4. Project ADT estimated based on PM Peak Hour traffic, which represents approximately nine percent of the ADT, as determined through traffic counts in the local area, and the distribution of project-related traffic onto the local roadway system, as determined through the traffic modelling analysis completed for the project.

5. Increase in CNEL based on 10 LOG ([Project-related ADT + Existing ADT]/Existing ADT)

6. Allowable increase in CNEL based on Table 3.10-7

7. In conjunction with analysis of the Project's operations-related traffic and resultant changes in noise levels on Harbor Drive south of Portofino Way, consideration was also given to operations-related traffic on Portofino Way west of Harbor Drive; however, it was determined that the vast majority (i.e., approximately 97 percent) of the Project's operations-related traffic would affect only the first 400+/-

feet of that road segment, taking access to/from the parking garage and new main street located immediately west of Harbor Drive. It is estimated that there would be only 12 vehicle trips occurring on the remaining portion of Portofino Way during the PM peak hour, specifically as related to travelling to/from the boat ramp. Those 12 trips related to the boat ramp usage would be more than offset by elimination of the existing 62 PM peak hour trips associated with Joe's Crab Shack, which would be replace by the boat ramp facility. As such, project-related vehicle traffic noise along that segment of Portofino Way near Ambient Noise Monitoring Location No. 2, relative to potential liveaboards in Basin 2, would represent a reduction compared to existing conditions.

8. Based on 2013 Caltrans traffic data for PCH between Pier Ave and Aviation Blvd

9. Based on PM Peak Hour traffic counts taken in September 2014, with the ADT estimated based on an assumption that PM peak hour traffic constitutes approximately nine percent of the ADT.

10. Based on a very conservative "worst-case" assumption that all of the project-related PM peak hour traffic heading northbound on Pacific Coast Highway, which is estimated to be approximately 20 percent of the project's trip distribution for that time at Intersections 38, 39, and 40, as shown on Figure 3 in Appendix X-2 of the Project Transportation Impact Study (DEIR Appendix L-1) turns eastbound onto Artesia Boulevard. As indicated in Table 3.13-11: Project Trip Generation Estimates of the Draft EIR, the total net new PM Peak Hour trips associated with the project would be 782, at which 20 percent of that would be 156 trips.

Table 3.10-11: Roadway Noise Level Increases Due to Project Construction-Related Traffic

Roadway	Nearest Noise Monitoring Location[1]	Estimated Existing CNEL (dBA)[2]	Existing ADT[3]	Existing + Worst-Case Construction Traffic ADT[4]	Construction -Related Increase in CNEL (dB)[5]	Allowable Increase in CNEL (dB)[6]	Does Project Increase Exceed Allowable Increase?
Beryl St. east of Harbor Dr.	1	58	12,867	14,762	0.6	3	No
Harbor Dr. south of Portofino Way	1	58	7,263	9,158	1.0	3	No
Torrance Blvd. between Project Site and Catalina Ave.	7	60	5,869	7,764	1.2	2	No
Torrance Blvd. between Catalina Ave. and Francisca	7	60	22,616	24,511	0.3	2	No
Catalina Ave. north of Beryl St.	8	61	18,340	20,235	0.4	2	No
Catalina Ave. south of Beryl St.	9	67	19,683	21,578	0.4	1	No
Pacific Coast Highway north of Herondo Street	11	71	52,500[7]	54,395	0.1	1	No
Herondo St. east of Pacific Coast Highway	10	67	17,011	18,906	0.5	1	No
Herondo St. west of Pacific Coast Highway	10	67	14,333	16,228	0.5	1	No
Artesia Blvd. east of Prospect Ave.	12	69	24,544[8]	26,439	0.3	1	No

Source: CDM Smith, 2015

Notes:

1. See Figures 3.10-1a and 3.10-1b
2. See Table 3.10-2
3. ADT – Average Daily Traffic
4. Assumes all 1,895 of the peak construction-related trips occur on subject roadway link
5. Increase in CNEL based on 10 log ([Construction-related ADT + Existing ADT]/Existing ADT)
6. Allowable increase in CNEL based on Table 3.10-7
7. Based on 2013 Caltrans traffic data for PCH between Pier Ave and Aviation Blvd
8. Based on PM Peak Hour traffic counts taken in September 2014, with the ADT estimated based on an assumption that PM peak hour traffic constitutes approximately nine percent of the ADT.

Table 3.10-12: Roadway Noise Level Changes Due to Future Cumulative Traffic

Roadway	Existing ADT	Future Cumulative ADT - With Project	Change from Existing CNEL (dB) for Future Cumulative With Project	Allow-able Increase (dB)	Does Cumulative Change in CNEL With Project Exceed Allowable Increase?	Future Cumulative ADT – Without Project[4]	Change from Existing CNEL (dB) for Future Cumulative Without Project	Does Cumulative Change in CNEL Without Project Exceed Allowable Increase?	Is Project's Contribution to Change in CNEL Cumulatively Considerable?
Beryl St. east of Harbor Dr. (between Project Site and Catalina Ave.)	12,867	11,834	-0.4	3	No	13,134	+0.1	No	No
Harbor Dr. south of Portofino Way	7,263	12,563	+2.4	3	No	7,407	+0.1	No	No
Torrance Blvd. between Project Site and Catalina Ave.	5,869	16,383	+4.5	2	Yes	6,026	+0.1	No	Yes
Torrance Blvd. between Catalina Ave. and Francisca	22,616	24,759	+0.4	2	No	23,802	+0.2	No	No
Catalina Ave. north of Beryl St.	18,340	21,773	+0.7	2	No	18,684	+0.1	No	No
Catalina Ave. south of Beryl St.	19,683	20,784	+0.5	1	No	20,494	+0.2	No	No

Pacific Coast Highway north of Herondo Street	52,500[7]	55,488	+0.2	1	No	53,988	+0.1	No	No
Herondo St. east of Pacific Coast Highway	17,011	19,000	+.05	1	No	17,533	+0.1	No	No
Herondo St. west of Pacific Coast Highway	**14,333**	**18,444**	**+.04**	**1**	**No**	**14,889**	**+0.2**	**No**	**No**
Artesia Blvd. east of Prospect Ave.	**24,544**	**25,145[2]**	**+.01**	**1**	**No**	**24,989[1]**	**+.01**	**No**	**No**

Source: CDM Smith, 2015

Note

1. Based on PM Peak Hour traffic counts taken in September 2014, with the ADT estimated based on an assumption that PM peak hour traffic constitutes approximately nine percent of the ADT, and increased to 2019 cumulative conditions based on an annual growth rate 0.36 percent, as was also assumed for cumulative traffic conditions for the intersections within the traffic analysis study area.

2. Based on a very conservative "worst-case" assumption that all of the project-related PM peak hour traffic heading northbound on Pacific Coast Highway, which is estimated to be approximately 20 percent of the project's trip distribution for that time at Intersections 38, 39, and 40, as shown on Figure 3 in Appendix X-2 of the Project Transportation Impact Study (DEIR Appendix L-1) turns eastbound onto Artesia Boulevard. As indicated in Table 3.13-11: Project Trip Generation Estimates of the Draft EIR, the total net new PM Peak Hour trips associated with the project would be 782, at which 20 percent of that would be 156 trips.

Comment AL001-12

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

Response to Comment AL001-12

Please see Master Response #2: Cumulative Analysis, regarding the fact that the cumulative impacts analysis completed for the proposed project is based on use of the adopted growth projections approach, consistent with CEQA Guidelines Section 15130(b)(1)(B). (See also *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 928-931 [EIR not required to use the list of project's approach to comply with CEQA, and can rely upon growth projections contained in the SCAG travel demand model].) Indeed, this is the same approach utilized by the City of Hermosa Beach in their own recently certified EIR for the E&B Oil Drilling and Development Project (certified on July 8, 2014), which expressly noted "projected regional traffic volume increases estimates have been used for the purpose of evaluating cumulative traffic impacts." (Hermosa

Beach E&B EIR, Section 4.13.9.)[32] While the Hermosa Beach EIR did not identify the source of these growth rates (as required by CEQA Guidelines Section 15130(b)(1)(B)), Appendix D to the E&B EIR notes that these growth factors were "derived from growth factors in the 2010 CMP."[33]

The adopted growth projections approach used for the Draft EIR incorporated a population growth rate of 0.36 percent per year, which was obtained from the Southern California Association of Governments (SCAG) Integrated Growth Forecast for the City of Redondo Beach. The SCAG growth projections were developed utilizing comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans and population, housing and employment forecasts for the City, neighboring communities, and the county. Utilizing this population growth rate for the purposes of the traffic analysis (and roadway noise), is considered conservative. For the traffic analysis in the Draft EIR, the SCAG travel demand model was run and compared to the model-assigned traffic assigned on roadways in the City (City-wide) between the base year (2008) and the forecast year (2035). The net change in volumes was a decline of two percent due to the transportation infrastructure improvements, land use changes, and policy strategies associated with SCAG's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS).

Therefore, future growth within the City and neighboring cities was considered in the cumulative impacts analysis consistent with CEQA requirements, and, as also discussed in the aforementioned Master Response, is considered to provide a very conservative (i.e., "worst-case") analysis of potential traffic impacts. In addition, please refer to Response to Comment PC323-38.

Also, please see the discussion above in Response to Comment AL001-11 regarding the conservative nature of the construction traffic noise impacts analysis related to the City of Hermosa Beach's comment.

Comment AL001-13

Population & Housing

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

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[32] City of Hermosa Beach, E&B Final EIR, Section 4.13 Transportation and Traffic: http://www.hermosabch.org/modules/showdocument.aspx?documentid=4294

[33] City of Hermosa Beach, E&B Final EIR, Appendix D: http://www.hermosabch.org/ftp/oil_docs/Appendix%20D%20Traffic%20Studies%206-10-14.pdf

Response to Comment AL001-13

As described in the NOP/Initial Study (Appendix A of the Draft EIR), given the proposed project's location within a well-established urban community with a large population base and an existing housing stock, a large existing labor pool in the local area and region as a whole, and established infrastructure, it would not induce population growth in the area. Refer to Response to Comment AL001-3 above, regarding the VMT commute distances used for modeling. It is anticipated that the local population would be the source of future retail/service industry employees.

As stated in the NOP/Initial Study, in March 2014 the unemployment rate in Redondo Beach was 4.6 percent (2,100 workers) and 8.7 percent (435,000 workers) in the Los Angeles County. Based on updated information, the 2014 annual average unemployment rate was 5.1 percent in Redondo Beach and 8.3 percent in Los Angeles County.[34] Therefore, there is an existing labor pool within VMT commute distances assumed in the EIR. Further, should any workers decide to relocate to Redondo Beach, there is available housing stock within the City. In 2010, the total number of vacant housing units of all types was 1,598, which represented an overall vacancy rate of 5.2 percent.[35] As the project site is located in an urban area with a large existing labor pool and infrastructure, the proposed project would not induce substantial population growth either directly or indirectly which would result in significant environmental impacts.

Comment AL001-14

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

Response to Comment AL001-14

As discussed in *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018 ["A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true…"] The trip generation developed for the project is representative of the worst case scenario based upon the project site plans and the application materials submitted by CenterCal. The project's trip generation rates are shown in Draft EIR Figure 3.13-13. Furthermore, the traffic analysis made several conservative assumptions as discussed in Response PC134-5 and includes an average overestimate of trip generation of approximately 4 percent (Draft EIR Appendix L1, page 11). Any subsequent changes to the project will be reviewed pursuant to CEQA Guidelines Sections 15162, 15163, and 15164.

[34] California Employment Development Department. 2015. Monthly Labor Force Data for Cities and Census Designated Places (CDP) Average Annual 2014 - Revised. March 6. Available at: http://www.labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html

[35] City of Redondo Beach. 2014. 2013-2021 Housing Element. Available at: http://www.redondo.org/civica/filebank/blobdload.asp?BlobID=2868

Comment AL001-15

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

Response to Comment AL001-15

Contrary to the assertions in the comment, the LOS and V/C results for Cumulative plus Project plus Mitigation are shown in Tables 3.13-36, 3.13-37, 3.13-38 in Section 3.13, Traffic and Transportation of the Draft EIR and Appendix L1 of the Draft EIR, Table 16. The LOS and V/C results for Existing plus Project plus Mitigation are shown in Draft EIR Tables 3.13-23, 3.13-24, and 3.13-25, and Appendix L.1 of the Draft EIR, Tables 15.

Comment AL001-16

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

Response to Comment AL001-16

The project applicant is obligated to implement mitigation measures MM TRA-2, MM TRA-3, MM TRA-4 and the eastbound right-turn lane in MM TRA-5 and is obligated to contribute a fair share towards MM TRA-1, MM TRA-6, and the northbound right-turn lane in MM TRA-5. As commonly occurs with fair share funding, the project applicant shall submit funds for the physical improvements set forth in the mitigation measures to the appropriate jurisdiction (e.g., City of Hermosa Beach or City of Torrance as applicable) prior to the issuance of a certificate of occupancy for the proposed project. This would be carried out with implementation of the Mitigation Monitoring and Reporting Program for The Waterfront project, which is considered and approved contemporaneously with certification of the EIR. (CEQA Guidelines Section 15097.) Fair share will be based on the total cost of intersection improvements divided by the projects percentage contribution of additional traffic to that intersection.

The information provided in the Draft EIR is sufficient to meet the requirements of CEQA in that it delineates the intersection improvements necessary to reduce project-related impacts to a less-than-significant level and commits, as a mitigation measure that will effectively be a condition of approval, the project applicant to contribute fair-share funding towards implementation of those improvements based on the project's increment of impact. That information and project commitment is all that is necessary for the EIR, as demonstrated in *Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949 [Section V(A); Unpublished portion of the opinion]. As discussed in Schenck "Although plaintiff's expert suggested that the LOS at the intersections in the area of the project would be adversely impacted, and funds were not available to improve the intersections, substantial evidence of effective mitigation measures was presented. Approval of the project was conditioned on payment by Mesa of traffic impact mitigation fees targeted for the County's Capital Improvement Plan for the airport industrial area. According to the conditions of approval, the final amount of the mitigation fees would be determined by the Sonoma County Department of Transportation and Public Works from an engineer's estimate. …The imposition of fees on Mesa to mitigate traffic impacts is not an unreasonably indefinite or nebulous mitigation measure… The County did not abuse its discretion by concluding that the payment of traffic impact fees constituted a reasonable mitigation program. The County identified specific plans for improvements designed to mitigate traffic impacts, and offered a commitment to allocating the mitigation fees to those projects. The precise timetables for the completion of the improvements were neither known nor

delineated, but the County was not required to set forth with certainty the schedules for implementation of the identified roadway improvements." See also *Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807 for similar reasoning as to why the type of information being requested by the commenter is not required under CEQA.

Comment AL001-17

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

Response to Comment AL001-17

As discussed in Section 3.9, Land Use and Planning of the Draft EIR, the allowable land uses at the project site are primarily coastal commercial and recreation uses. No residential uses are allowed under the existing General Plan, Coastal Zoning or Local Coastal Program, nor are residential uses consistent within the project objectives and City's goals and policies for the waterfront area (See Chapter 2, Project Description of the Draft EIR). These land use regulations were the subject of over a decade of planning efforts as discussed in Draft EIR Section 2.1.1.5.8, which were considered approved by Planning Commission, Harbor Commission, City Council, Coastal Commission, and the Redondo Beach electorate. (See also *Citizens v. Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553,571-573 [The Court held that the analysis of alternative locations in a project level EIR "would have been in contravention to the legislative goal of long-term, comprehensive planning…case-by-case reconsideration of regional land-use policies, in the context of a project specific EIR, is the very antithesis of that goal.") Similar restrictions are also generally included in the City's Tidelands Grant discussed in Section 3.9. Furthermore, residential/mixed use development has been previously proposed in proximity to the project site in (1) the Heart of the City Zoning, which was the subject of a successful referendum (Draft EIR Section 2.1.1.5.5), and (2) in Measure B proposed in 2014, which was rejected by the voters (see Master Response #1: AES Power Plant Site). For all the reasons described above, the commenter's suggestion is considered infeasible.

The bulk of the trips generated by the project would be patrons and customers rather than employees. Employees for retail and food service tend to not follow the typical morning and evening commute periods that are associated with office employment. In the PM peak, that would include midday patrons and customer departures, and evening patron and customer arrivals, many of whom would be traveling from their work place to the site to shop and dine after work.

The project is located within walking distance of approximately 1,400 existing residential uses, and 450 hotel rooms. By providing additional retail and restaurant amenities, the proposed project would be expected to reduce VMT from these uses in comparison to the regional average.

As discussed in Section 3.6, Greenhouse Gases of the Draft EIR, the proposed project would reduce its VMT relative to if it were located elsewhere because it would be a redevelopment project located within walking distance to public transportation and existing residential uses within the City. The location of the project in close proximity to both transit, the California Coastal Trail (a well utilized pedestrian/bicycle path), and existing residences would also reduce transportation emissions within the City.

Notwithstanding the fact that the commenter provides no evidence that a mixed-use alternative, which includes residential use targeted to the income level of future employees, would be a means of reducing PM peak traffic

and related VMT and emissions, such a reduction, if any, would not avoid or reduce any significant impacts associated with the proposed project.

Comment AL001-18

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

Response to Comment AL001-18

Regarding peak summer weekend periods, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment AL001-19

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

Response to Comment AL001-19

As discussed on page 3.13-53 in Section 3.13 of the Draft EIR, the majority of the construction would occur on the project site and minor roadway connections and improvements would be required on roadways immediately adjacent to the project site. As is standard for construction within City streets, the City would require traffic control plans, rerouting of traffic, and business and emergency ingress/egress for the adjacent roadway connections/improvements. The standards include maintaining a reasonable number of travel lanes during construction. The connection/improvement work on the adjacent roadways as a result of the project would be temporary and would not create substantial congestion, inconvenience to motorists, or hazardous conditions that would be caused by the proposed project on a regular or frequent basis in comparison to existing conditions; therefore, the impact would be less than significant. Construction traffic is also not expected to add substantial congestion because it will generate fewer trips than are generated by the current land uses on the project site under existing conditions and construction truck trips will primarily occur during off-peak hours.

In regards to potential cumulative effects of overlapping construction of this and other projects, although the projects are in varying stages of development, there would likely be some overlap of construction activities. However, given that the project’s construction activities would generate less trips than are generated by the current land uses on the project site that would be removed, the project’s contribution towards cumulative construction impacts would not be cumulatively considerable. As demonstrated in Draft EIR Table 3.13-12, there is almost a five (5)-fold decrease in the number of trips during project construction in comparison to existing conditions. (1,895 construction related PCE vehicle trips in comparison to the 9,684 existing vehicle trips from current operations). With this substantial reduction in trips, the reduced auto trips will more than offset the temporary increase in truck trips during the construction phase. As shown in Draft EIR Appendix L1, Appendix X.2, Figure 2, approximately 20 percent of the project trips are expected to head north on PCH through the City of Hermosa beach, this is the equivalent of 1,972.8 trips under existing conditions (9,684 existing trips x20 percent). With a 50-50 split between the north and south construction hauling routes (Figure 3.13-9), the project would result in approximately 947.5 daily PCE trips along PCH, a reduction of more than 50 percent relative to the existing traffic generated by the site.

Furthermore, those trips are being conditioned to occur outside the peak traffic hours (COA TRA-1). More detailed construction related cumulative analysis is not required. (See CEQA Guidelines Section 15130 ["An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."].)

Comment AL001-20

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

Response to Comment AL001-20

A detailed parking demand analysis was prepared and is included in Master Response #7: Waterfront Parking. As described in the Master Response #7, an Urban Land Institute's (ULI) analysis was performed and shows that the project provides sufficient parking using shared parking, based upon the mix of land uses. The corrections and additions to the parking analysis in Section 3.13 of the Draft EIR is found in Chapter 3, Modifications to the Draft EIR of this Final EIR.

The commenter also asserts that the requirement to "Promote Alternative Transportation Modes for Employees and Patrons" is not mandatory and therefore cannot be relied on for mitigation. The EIR does not rely upon this aspect of the mitigation measure to ensure that impacts are less than significant and it was included as a matter of sound policy. However, the suggestion to make this component of the mitigation measure MM TRA-7 mandatory is legally infeasible. (See Health and Safety Code Section 40717.9; *Merced Alliance for Responsible Growth v. City of Merced* 2012 WL 5984917 [Court concluded it was it was legally infeasible to mandate ridesharing].) As discussed in *Merced*:

> The final EIR modified Mitigation Measure 4.2-2b to provide that "[t]he applicant shall implement design features and develop program incentives that discourage employees from commuting in single occupant vehicles … in order to reduce associated mobile-source emissions." [¶] The challengers argue that the city's interpretation of Health and Safety Code section 40717.9 is wrong. The statute provides: [¶] "(a) Notwithstanding Section 40454, 40457, 40717, 40717.1, or 40717.5, or any other provision of law, a district, congestion management agency, as defined in subdivision (b) of Section 65088.1 of the Government Code, or any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law and the elimination of the program will result in the imposition of federal sanctions, including, but not limited to, the loss of federal funds for transportation purposes. [¶] "(b) Nothing in this section shall preclude a public agency from regulating indirect sources in any manner that is not specifically prohibited by this section, where otherwise authorized by law." (Health and Safety. Code, Section 40717.9.)

> The challengers argue that this statute applies to local air districts but not cities and counties. They ignore the fact that the statute applies to "any other public agency," not just local air districts. The challengers also argue that the statute is only intended to prevent local air districts from adopting regulations of general application to existing businesses; it is not intended to prevent individual cities and counties from imposing requirements on individual employers. The language of the statute does support their interpretation. Health and Safety Code section 40717.9, subdivision (a), states, "any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law …." The final EIR reasonably interpreted the statute to mean that Merced, a lead agency, could not require Wal-Mart, an employer, to implement such a program. (See Remy et. al., Guide to CEQA (2006 ed.) p. 542 [Health and Safety. Code, Section 40717.9 "eliminates employee trip reduction programs as one of the types of mitigation that cities and counties can impose under CEQA for impacts on air quality and transportation facilities"].) [¶] In any event, the challengers have not shown that the city's modification of the mitigation measure is a violation of CEQA….The respondents point out that the final EIR concluded that implementation of another mitigation measure—an emission-reduction agreement with the SJVAPCD—would reduce NOx and PM10 emissions to less-than significant levels.

In light of the above, the promotion of alternative transportation modes, as well as the associated objective to support trip and emission reduction goals have been carried forth within a new condition of approval for the project. As such, the addition of the following condition of approval (COA) is included in Chapter 3, Modifications to the Draft EIR within this Final EIR:

COA TRA-2: Promote Alternative Transportation Modes for Employees and Patrons

With the objective to support trip and emission reduction goals, the project applicant shall encourage employees and patrons to use existing bus service, pedestrian and bicycle connectivity to and through the site, which would decrease the number of vehicle trips. In addition, TDM measures that could further reduce trips could include:

- Shuttles to/from the Metro Green Line Station
- Shuttles to/from LAX for hotel guests
- Transit pass subsidies, vanpool services, and other incentives to employees to reduce vehicle trips.

Regarding the commenter's assertion that the inclusion of satellite parking in the list of options identified in MM TRA-7 may have physical impacts of its own, the likelihood, nature, and location of such impacts would be speculative, at best, for this level of project planning and CEQA does not require the analysis of such speculative impacts.

Comment AL001-21

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

Response to Comment AL001-21

Please refer to Response to Comment AL001-20 above regarding mitigation measure MM TRA-7 and the ULI analysis performed for the project, which shows that the project provides sufficient parking to meet demand, without mitigation, based upon the mix of land uses.

Also, as shown in Chapter 3, Modifications to the Draft EIR within this Final EIR, with the removal of MM TRA-7, the objective to support trip and emissions reduction goals is carried forth in a new condition of approval for the project, as discussed above in Response to Comment AL001-20. For discussion of an alternative providing affordable housing on the project site, please see Response to Comment AL001-17.

Comment AL001-22

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

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

Response to Comment AL001-22

The commenter provides no legal basis for asserting that the selection of alternatives must be based upon the underlying intent of the lead agency. As expressly acknowledged in the comment, the Draft EIR has identified alternatives which “reduce impacts.”

Chapter 4, Analysis of Alternatives of the Draft EIR presents a list of the environmental impacts that cannot be mitigated in Section 4.3.2, and it provides a summary comparison of each alternative with the proposed project for each impact in Table 4-63 and 4-64. The alternatives analyzed in the Draft EIR were formulated with consideration given to reducing the significant environmental impacts of the proposed project, taking into account the objectives of the proposed project, and also served to foster informed decision making and public participation. During the alternative formulation process, several alternatives were selected specifically because it was deemed likely that certain significant impacts would be reduced or avoided in comparison to the proposed project, and also alternatives were selected for purposes of fostering informed decision-making by presenting an analysis of certain elements of the proposed project to determine whether impacts associated with removing or modifying those elements would be greater or less as compared to the proposed project (i.e., not modifying Seaside Lagoon addressed under Alternative 3, not seeking approval for a land exchange with the

California State Lands Commission addressed under Alternative 4, not reconnecting Pacific Avenue addressed under Alternative 5, and modifying the construction phasing addressed under Alternative 6).

Comment AL001-23

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

Response to Comment AL001-23

Thank you for your comments. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body

Comment AL001-24

- H20 Hotel @ 1429 Hermosa Ave – construction commencing 1st quarter 2016; 11-24-15 City Council report
  link: https://hermosabeach.legistar.com/LegislationDetail.aspx?ID= 2521469&GUID=C946C473-135F-4C53-BD39-460A28DFC4AB
  http://www.hermosabch.org/index.aspx?page=358

- Hermosa Ave Street Improvement Project – construction commencing Jan 2018; see Downtown Core Revitalization Strategy for project description
  http://www.hermosabch.org/index.aspx?page=775

- OTO hotel @ 11th & Beach Drive: project on hold; see 9-9-14 City Council report for project description http://www.hermosabch.org/index.aspx?page=358

- Transpacific Cable on beach west of 25th St & on beach west of Neptune St – see NOP/IS posted on City website for project description http://www.hermosabch.org/index.aspx?page=504

- Skechers @ 30th & PCH: construction commencing Jan 2017 in MB
  & Sept 2017 in HB; see NOP/IS posted on City website for project description
  http://www.hermosabch.org/index.aspx?page=504

- Pier & Strand Hotel – construction commences January 2018 and ends in 2020; see [provide website link]

- Transpacific Cable – construction (first phase) begins and ends in 3rd quarter of 2016, with subsequent phases scheduled for 2020 and 2025

- Plan Hermosa – Update of City of Hermosa Beach General Plan (in progress); see [provide website link]

Response to Comment AL001-24

Thank you for your comment. Please refer to Master Response #2: Cumulative Analysis and Response to Comment AL001-2 and AL001-12. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. AL002 TORRANCE TRANSIT

Comment AL002-1

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

Response to Comment AL002-1

On page 2-30 of Chapter 2, Project Description, the Draft EIR acknowledges that the Torrance Circle, provides vehicle access to the Pier Parking Structure and George Freeth Way, south of Veterans Park, as well as being used as a temporary layover area for transit buses, tour buses, and taxis, service vehicle parking and loading/unloading, and a passenger drop off/pick up location. Also as noted in Table 2-2 of the Draft EIR (page 2-45), the Torrance Circle is included within the southern portion of the project site and only includes minor modifications associated with the entrance to the new parking structure and Pacific Avenue Reconnection. The minor modifications will not change the existing layover function or area currently used by Torrance Transit.

2.3.5 Public Comment

A copy of each comment letter and email received is provided in Volume II of the Final EIR. Following are comments and response to comments PC001 to PC561:

COMMENT LETTER NO. PC001 ROSS YOSNOW

Comment PC001-1

I am writing today to inform you that the "specialty theater" in the harbor is a terrible idea.

Over the past few decades, 10 movie houses in the Beach Cities and Torrance have closed down, while only one theater has opened in the last 10 years.

Here's a list of the closures:

1. Drive-in on Torrance Blvd. across the street from Bishop Montgomery High School.
2. UA Del Amo in Torrance.
3. Theaters on comer of Catalina and Torrance Blvds. in Redondo Beach.
4. Mann's Old Town Theaters in Torrance.
5. Theaters with Stadium seating across from Ralph's in Torrance. Now a Hometown Buffet.
6. AMC theaters in Hermosa Beach on PCH at Ardmore.
7. The Bijou Theater in Hermosa Beach.
8. Six theaters in No. Redondo in 3 buildings just south of the Galleria. Now Sprout's and Target.
9. Mann's in Manhattan Beach at Rosecrans and Sepulveda.
10. Theater at PCH and Crenshaw in Torrance.

Meanwhile, only one theater has opened here, the AMC at Del Amo.

If I didn't know better I might think that fewer people now live here, but that's hardly the reason so many theaters have closed.

NetFlix, 80-inch screens, 3D, and the high cost of going out have all contributed. And the trend continues. Over the July 4th weekend last year America's theater owners reported the worst weekend attendance in 25 years. Like so many other theaters, this will close down leaving Redondo residents to pick up the pieces. It's a terrible idea.

Response to Comment PC001-1

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for discussion of the viability of a movie theater at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC002 MARGARET OTTO

Comment PC002-1

The NRBBA.org was privileged enough to see the plans for the water front. It is amazing and so needed. I am concerned about the boat ramp being near the lagoon. I understand that there are other sites in consideration. I am concerned about the pollution from the boats being near the children swimming. Having 4 children, I need keep their health at the forefront.

Can you keep me up-dated about the location of the boat ramp?

Response to Comment PC002-1

The commenter first states that they are "concerned about the boat ramp being near the lagoon." To the extent the commenter is referencing safety, please see Impact TRA-3, starting on page 3.13-80, in Section 3.13, Traffic and Transportation of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. As analyzed in Section 3.13, under Impact TRA-3, the potential for the proposed project to substantially increase hazards associated with the boat ramp and Seaside Lagoon due to design or incompatible uses would be less than significant with the slow speeds in the area, navigation aids (designated waterway markings and signage) and implementation of mitigation measure MM TRA-8. The potential for interface conflicts between boats and personal recreational watercraft operating in proximity to each other would be reduced to less than significant. Specifically, the operation of the proposed small craft boat launch facility at Mole C and its proximity to the Seaside Lagoon and Basin 3 was analyzed. The analysis found that even during times of peak demand at the boat launch the maximum rate would be four launches per hour per lane, which is approximately two boats entering the harbor every 15 minutes. This was not found to be a significant increase in boat traffic and would not disrupt existing harbor traffic or impact water use. Boats returning to the launch ramp for retrieval may arrive at more frequent intervals in the afternoon. Based on a very conservative (i.e., worst-case) assumption that one-half of the 40 boats (i.e., the maximum capacity of the boat launch ramp parking lot) return within a 2.5 hour mid- to late-afternoon time window, the boat retrieval activity during such a high peak demand period could be accommodated with a retrieval rate of eight boats per hour and the remaining 12 boats may queue nearby at any one time. Sufficient space within the turning basin or the north end of the outer harbor near the mooring area is available for temporary mooring until boarding float space becomes available. On non-peak days, boat launches are estimated to be much lower.

Regarding the commenters concerns about the pollution from the boats being near the children swimming, please refer to Master Response #4: Modifications to the Seaside Lagoon.

The commenter is correct that there are other boat launch ramp sites under consideration. Starting on page 4-295 of Chapter 4, Analysis of Alternatives of the Draft EIR, Alternative 8 – Alternative Small Craft Boat Launch Ramp Facilities With King Harbor analyzed six options to the proposed two-lane boat ramp within the project site.

By commenting on the proposed project, your contact information has been added to the mailing for additional information on the proposed project. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC003 BRIAN & LEANNA SLAGEL

Comment PC003-1

We moved to Redondo Beach 3 years ago and live just a 15 minute walk from the Pier on the Esplanade. It is sad for us to see the deplorable conditions at the pier now and are so hopeful that this renovation will take place. We would love to be able to walk to a vibrant shopping and entertainment place like the new waterfront can be. All of our favorite places there now like Quality Seafood, Tony's etc.. will still be there as well as an amazing new array of things.

We hope you support this project moving forward that will make our city a destination city instead of us having to leave to find good options. The video is truly amazing and we cannot wait to see it come to fruition.

Thanks for listening

Response to Comment PC003-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC004 DAN ELDER

Comment PC004-1

I wasn't able to attend the council meeting unfortunately but it was suggested to me that I send a copy of my email to you. I sent this to Mayor and Council in support of redevelopment of our waterfront.

Dear Councilmember Ginsburg,

I apologize that I won't be able to attend in person but you have Matt Kilroy to blame for that, he dragged me into AYSO and now I'm trapped :) I'm sure there will be voices of discontent over The Waterfront EIR (agenda item N.1) but mine isn't one of them. I would like to add my voice to those who want to see progress happen in our city. The proposed redevelopment comes at a critical time when we're faced with millions in repairs that we can't afford for a pier area almost no one in the city goes to. Our waterfront is a run down mess we should be ashamed that we've let it get this bad. While there is a vocal minority who oppose any new development that's not what the silent majority want. We want sensible balanced development. We want a waterfront we can take our families to and be proud of. We want to ensure our waterfront is economically viable and not a financial drain. We want a waterfront worthy of Redondo Beach.

Is the centercal proposal perfect? Of course not nothing man made is perfect. No project will be perfect for everyone. In my opinion they've come up with the best design I've seen by a long shot and I wanted to voice my support so that the silent majority isn't drowned out by a vocal minority. I'm sure some folks would be perfectly happy to let the whole pier fall into the ocean and have their own private waterfront but doing nothing isn't an option. Scaling the design back to a smaller footprint isn't economically viable and leaves the residents on the hook to finance an area too underdeveloped to attract anyone. Places without traffic are places no one wants to go to sometimes a little traffic isn't a bad thing.

The proposed plan is built around pedestrian and bike access which is what we should be striving for not doing everything we can to make it easier for cars to get around.

Thank you again for your service to our community

Response to Comment PC004-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC005 CHRIS & VANESSA FARENTINOS

Comment PC005-1

I just watched the video. WOW!!! I can't wait!

My wife, Vanessa, and I have lived in the South Bay for 26 years, most of it in Redondo Beach. We live here in South Redondo, and decided to move our business to Pier Plaza about 4 years ago. Even without the Waterfront project becoming a reality, it was the best thing we could have done for our and our employee's quality of life. We are lucky enough to enjoy the pier area every day, eating at the local establishments and the farmer's market, entertaining customers and business associates in the local area, putting up visitors at our neighborhood hotels, and playing after work and on weekends. Our business wifi actually works at Tony's upstairs, which can present a bit of a problem keeping priorities straight!

The soul of Redondo Beach resides here, and we feel it under our feet every day. With my office window open, I often hear the street musician playing old Elvis tunes over the sound of the waves, smell fried shrimp, and see sailboats move in and out of the Marina against the back drop of the Pacific Ocean. What's missing are people -I can only count 12 on the pier right now on this beautiful, crystal clear day! The soul of Redondo Beach has been ignored- the buildings feel like they are going to fall down, the concrete is peeling, rust is everywhere and the roof leaks. Every soul needs to be fed in order to thrive and realize its full potential. The Waterfront project will feed the soul of Redondo Beach, and as it thrives people will come to witness it.

We wanted to show our support for this amazing project and can't wait to move out during construction and hopefully get to move back in when it's done!

With gratitude for the work you've already put in.

Response to Comment PC005-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC006 DAVID SMELSER

Comment PC006-1

Don't add any more building square footage or create more traffic. I am 73 years old, grew up in Redondo and played often at the harbor. I could launch my boats from the sand beach there and enjoyed it just the way it was.

The last time I saw a financial accounting of the harbor it was losing money and costing the residents of Redondo. I would like to know how many boats owned by Redondo residents are in the harbor today. I'm guessing, not many.

Response to Comment PC006-1

The current financial account of the harbor and the number of existing boats owned by Redondo residents that are in the harbor are not CEQA or environmental issues associated with the proposed project. Please see Draft EIR Section 3.13, Traffic and Transportation, which addresses impacts associated with vehicular and watercraft traffic.

Comment PC006-2

The section of the harbor you are proposing to fool with does need work. Redo the small boat launch and open that area up to residents and visitors. I like the idea of restoring the sand beach by opening the swimming pool area. Just be sure to allow small boats and paddle boards and other beach toys free access to that area.

Response to Comment PC006-2

The proposed project does include opportunities for small boat launching at the proposed small craft boat launch ramp facility, and it opens up Seaside Lagoon to the public year around. The newly opened Seaside Lagoon also includes hand launching and access for small boats, kayaks and paddle boards.

Comment PC006-3

No more cars, no more slips, no more buildings to block access, breeze and views.

Response to Comment PC006-3

The commenter has provided general comments on environmental issues that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Please see Draft EIR Sections 3.1 and 3.2 for discussion of aesthetics and air quality, respectively.

COMMENT LETTER NO. PC007 SHIRLEY CABEEN

Comment PC007-1

I attended the first two hours of the presentation today, Saturday. As has been usual, the agenda was almost non-existent with three hours for comments/questions from the public that were not addressed by the developer. What we need is more information not endless remarks with too many personally-related concerns and reminiscences about the Pier area.

I perused the EIR and as you said, it is very technical, filled with charts about mitigation but largely unreadable. What is missing is a full narrative on the project and detailed answers. If this is not EIR typical format, a separate document is now in order to answer these questions and provide real specifications on the design, scope, parking, environment, etc. of the project. For example, without some cheap, short-term parking (preferably city-metered) there will be very few shoppers as you don't way to pay $10 extra to pick up a birthday gift, market fish or lunch to go. I am an active shopper and diner and spend considerable disposable

income this way, as do my friends. The project's ability to attract cannot be modeled after successful CenterCal properties with free parking.

When is there going to be a meeting with a real conversation from CenterCal and the interested residents about the project? This was certainly not it and the meetings last year were severely lacking in exactly the same way: some blowing off of steam, pitch for pet projects -waste of time. The generous snacks do not make up for wasted time.

I hope the City of Redondo can step up to the plate and insist on real dialogue.

Response to Comment PC007-1

The intent of the three public meetings on the Draft EIR was to receive public comments on environmental issues and the results of the Draft EIR. Handouts (called The Public Meeting Guide) that detailed the purpose of the meeting, the meeting format and ways the public could provide input were provided at the sign-in/welcome table and throughout the venue at each of the three public meetings on the Draft EIR. As indicated in the meeting guide, as well as announced at the beginning and close of the presentation/verbal comment period, staff was available in the foyer of each venue during the entire meeting to answer questions about the proposed project and the Draft EIR. Although the intent of the public meeting was to receive public comments on environmental issues and the results of the Draft EIR, it was also a chance for the public to give their opinion on the proposed project. Response to comments are provided as part of the Final EIR process.

The format and intent of the Draft EIR is to evaluate the proposed project's impacts on environmental resource areas/issues by addressing typical environmental questions (based on the State CEQA Guidelines Appendix G checklist) and threshold of significance that the lead agency uses to determine if an impact is significant.

The commenter stated that a full narrative on the project is missing. This information is included in Chapter 2, Project Description of the Draft EIR, and includes a very detailed and full narrative of the proposed project and its elements. For a summary of the project description and the environmental impacts of the proposed project and alternatives, the stand-alone Executive Summary document is also included in the Draft EIR. Additional details regarding parking are also included in Draft EIR Section 3.13, Traffic and Transportation.

As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

COMMENT LETTER NO. PC008 DAN BUCK

Comment PC008-1

Please see that my comments get posted and replied to if possible.

1. I have attended many meetings where view issues have been discussed without any reply or resolution. In the early stages of this project CenterCal responded by stating that they would provide a scale model of the project for residents to review. Now is the time for that review, where is the model? When and where can we see it?

la.) If CenterCal can't even deliver a model as promised, how can we trust them to deliver anything else they promise?

lb.) How does the city plan to solve this question and concern?

Response to Comment PC008-1

Please see Section 3.1, Aesthetics and Visual Resources of the Draft EIR for an analysis of views and visual modeling associated with the project. The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) used to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the 3D computer model.

Comment PC008-2

2. Harbor seals/sea lions are an environmental problem for the boat owners in the harbor. How does CenterCal or the City propose to protect the children and swimmers in the new Seaside Lagoon from the seals?

2a.) Who is responsible for liability for seal bites or lost revenue if the lagon becomes unsafe or unusable?

I hope to hear answers to these questions, they are not uniques and have beespoken and published many times without reply

Response to Comment PC008-2

Section 3.3, Biological Resources, of the Draft EIR addresses the current and anticipated future issues at the project site associated with pinnipeds (specifically the California sea lion and the harbor seal). Starting on page 3.3-44 of Section 3.3, the Draft EIR analysis details how the proposed project includes a number of actions to expand connectivity of land and water facilities for the public. Such actions include addition of launch ramp boarding floats, construction of a breakwater, and the connection of Seaside Lagoon to create a protected cove. The opening of Seaside Lagoon to harbor waters would make the lagoon and beach area accessible to pinnipeds. Seaside Lagoon is expected to be an active land and water public use area, and would have constrained entrance to the embayment because of the breakwalls. Additionally the Turning Basin has a high level of watercraft activity, which is expected to increase with the proposed boat launch ramp; these features are expected to be a deterrent to sea lion use of the site as haul-out. Furthermore, under existing conditions there are alternative locations, which are more conducive for sea lion haul-outs within the harbor, such as the floating platform. Therefore, it is not anticipated that sea lions would use the beach at the modified Seaside Lagoon as a haul out in substantial numbers. However, the sea lion population within southern California is increasing, and under certain conditions, such as years with higher populations of sick and malnourished animals, small open lagoons such as the proposed opening of Seaside Lagoon, have been used by sea lions to haul-out. As described further in Section 3.3, there are examples of sea lions using sandy beaches as haul out locations in southern California, such as La Jolla Cove and Kellogg Beach in San Diego. Also, there are other sandy protected beaches that do not have a history of being used as haul outs, such as Mother's Beach in Marina del Rey and Baby Beach in Dana Point. Although it is not anticipated sea lions would move into the lagoon during the peak of the summer season (particularly due to high public use in the lagoon), during low use periods of winter sea lions may try to make use of the protected area as a haul-out, during high surf and storm periods when the protected beach area provides increased protection against weather. However, sea lions prefer areas away from human activity and thus, high public use within the lagoon would be a detractor from sea lion occupancy as a haul-out. Therefore, it is expected that the floating platform, breakwaters, and docks elsewhere in the harbor that are currently used by sea lions would be the first choice for sea lion haul-out.

As described above, implementation of the opening of Seaside Lagoon and the small craft boat launch facility would not result in a substantial adverse impact on a sensitive species (pinnipeds) in comparison to existing conditions; therefore, impacts would be less than significant. However, given that under existing conditions, the potential of undesirable human-pinniped interactions is growing, it is appropriate to monitor sea lion activities and respond early with deterrents prior to the development of more serious problems. Therefore, while impacts of the proposed project are less than significant, the City is proposing a Condition of Approval (COA) as part of its Conditional Use Permit procedures. COA BIO-3: Marine Mammal Management Program includes a marine mammal management program to be prepared and implemented by the City of Redondo Beach prior to the opening of Seaside Lagoon to harbor waters to deter pinnipeds from establishing a regular presence in the lagoon or immediate vicinity. The program includes education, signage and animal control steps and staff working with marine mammal rescue organizations and the National Marine Fisheries Service Southwest Region Marine Mammal Stranding Network. Please see Draft EIR Section 3.3, Biological Resources, for additional details.

COMMENT LETTER NO. PC009 LAUREN COTNER

Comment PC009-1

The Waterfront Makes Economic Sense

When I think about how "The Waterfront" will benefit this community, I don't just think about how I will be able to shop, eat and enjoy great events there. I think about how the project will being in much-needed revenue that will go directly to our deserving police officers, firefighters, teachers and other public servants. I really feel that we will get that sense of community back, and make Redondo Beach a destination people will plan to visit year in and year out. I welcome this, as the visitors increase revenue to the city, currently, we have what i refer to as "cooler tourists", many come, with their coolers, and use our parks, and facilities, and leave behind their trash and drain our resources.

"The Waterfront" offers more than $250 million in immediate private investment, and will generate $3.25 million for the City annually through property, sales and hotel taxes. This money will fix infrastructure that is falling apart, and save us the need to continue making the haphazard improvements that we're currently doing.

The vision of the developer is what this community has needed for years, it's keeping the charm of Redondo Beach, and catering to the many of us that "ride share" when we go out.

Not only that, but as a REALTOR (c), I am so excited to see the waterfront and nearby property values increase in value.

This project is a win-win for everyone in the community, the property owners, and the city, so let's make sure that happens.

Response to Comment PC009-1

The comment does not address an environmental issue. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC010 MAUREEN HICKEY

Comment PC0010-1

My comments below.

From: Bill Brand [mailto:bbrand@earthlink.net]
Sent: Sunday, November 22, 2015 5:32 PM

This is too big and it has been too big for two years. They will not be reducing it. Please send your comments to Katie.Owston@redondo.org and tell her they are for the CenterCal EIR.

Bill

On Nov 22, 2015, at 1:05 PM, Maureen Hickey <mohickey63@verizon.net wrote:

Hi Bill,

I live in North Redondo and am a life-long resident in the South Bay. I used to come to the pier with my family for dinner or bike rides. I do remember my father not allowing us to hang out in the arcade or the fish market/bar area at the lower level by the harbor because of the "seedy" clientele. I do think the waterfront can be improved so people would feel more comfortable going to all parts of the pier with their children. I do share concerns about the environmental impact and the increased traffic, but I think a solution can be found to address all these concerns.

After viewing the video, I see a great opportunity for a community center to bring residents together in an inviting way. I do see the disadvantage as Bob Pinsler does of having a mall take over the community center. The question I have is what makes a community center? I think it means a place for the community to gather for recreation, eating, chance meetings and shopping. I do fear that the shopping will overpower the community experience and gentrify the city. However what should it be? What is your idea of a livable, sustainable community center for Redondo Beach? I'd be happy to hear your ideas.

Thanks for your service to the City of Redondo Beach! I've been aligned with all of your initiatives and direction for the City; I'm torn on this one.

From: Bill Brand [mailto:bbrand@earthlink.net]
Sent: Tuesday, November 17, 2015 2:10PM
To: Bill Brand <bbrand@earthlink.net>
Subject: Opinion and Fixed Link

Greetings Everyone,

I received a lot of responses to the video I posted yesterday - some favorable and some not. The concerns ranged from traffic, blocking of public views, size and disregard of public input. Here's a dissenting opinion from former Redondo Council Member, Bob Pinzler: htt;p://www.easyrademews.com/76195/local-government-10/

The link provided to the video yesterday was deactivated so here are two other ways to view it:

htt,ps://vimeo.com/144565832

htt,p://thewaterfrontredondo.com

Keep those comments coming! First info session on the Environmental Impact Report is this Saturday, November 21,

Bill

Response to Comment PC010-1

The commenter has provided general information that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. The commenter's thoughts regarding a 'community center' are noted. It should also be noted that the land use mix assumed for the proposed project is more restaurant than retail (35 percent restaurant vs 20 percent retail). Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC011 STEVE GOLDSTEIN

Comment PC011-1

I've been a resident of Redondo for 32 years now, and I honestly started thinking that we were never going to improve the waterfront in my lifetime. Now we have the chance, and I can't believe that people are trying to get in the way.

We've done everything we're supposed to as a community to ensure that it fits within our vision and benefits us. We as voters approved Measure G in 2010, which set the guidelines for any development in the area, and our City set up a contract with CenterCal that gets them to invest millions in the waterfront, particularly in our crumbling infrastructure, taking the burden off of us, since we don't have the money anyway.

I'm tired of waiting, and I know lots of other residents would agree. We have found a project that works. The recently released Draft Environmental Impact Report proves this with hardly any environmental impacts and so many benefits. Let's support The Waterfront and not miss this important and historic opportunity for our community.

Response to Comment PC011-1

The commenter has provided general information that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC012 JIM VEECK

Comment PC012-1

I support this project in its entirety. I just wish that you could start this massive undertaking tomorrow.

Response to Comment PC012-1

The commenter states an opinion/preference relevant to the project approval: your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC013 J. CHARLES

Comment PC013-1

They want residents to "voice (our) support for massive overdevelopment on our waterfront due to king tides. While I am extremely concerned over climate change and rising tides. I am in firm opposition to this gross over-build as a panacea. I want sensible redevelopment, not hyper overdevelopment. We can deal with this issue in other ways, as cities around the world are doing now and many have been doing for years.

That's my voice, and it screams, "No CenterCal! No overdevelopment!"

Response to Comment PC013-1

Several project elements associated with the proposed project (such as raised elevations in the northern portion of the project site, replacement of International Boardwalk business with an higher elevation Pacific Avenue Reconnection, a splash wall near Kincaid's, and a sea level rise adaptation plan) are intended to address current flooding and wave uprush, as well as future sea level rise. For details on these elements and environmental impacts, please refer to Section 3.8, Hydrology and Water Quality, of the Draft EIR. Impacts associated with climate change are also addressed in Draft EIR Section 3.6, Greenhouse Gases. As discussed therein, the California legislature adopted Senate Bills 375 and 743 with the goal of creating developments, which provide for a reduction in vehicle miles traveled. The proposed project was determined to be consistent with these goals, as provided in the regional transportation plan (see also Draft EIR Section 3.13, Traffic and Transportation). Please also see Draft EIR Section 2.1.1.5.8 in Chapter 2, Project Description, for discussion of the history of the City's cumulative development cap for the Harbor/Pier area.

The commenter states an opinion/preference relevant to the project and the project's approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC013-2

Internet Article – The Redondo Harbor Boardwalk & Marketplace

International Boardwalk flooded and businesses will not be able to open due to danger on property!

This is not a joke folks! The King Tides were expected and have rolled in: http://www.lantimes.com/ …/la-me-in-king-tides-hit-california …

This is exactly why we have to pay attention to our Pier NOW! We have been stating for a long time that there is a fear of flooding down at the Pier on International Boardwalk. Well it has happened. These pictures *[no pictures provided]* were taken this morning as we observed the high tide crest the retaining wall and flood onto International Boardwalk and some businesses. It is too early to tell what damage has been done, but we also have another day and a half of these higher tides. Imagine what will happen this winter with El Nino!

Now is the time. Please take 1 minute out of your day and send an email to katie.owston@redondo.org and voice support for Redondo's Waterfront Revitalization! If you haven't seen the entire vision, you can find it here: http://thewaterfrontredondo.com All it takes is a simple comment stating you want to see this in Redondo. If you have questions, ask too! The responses will be included in a follow-up document that will be publicly available. We need all of our friends, neighbors, any resident of Redondo Beach, Hermosa, Torrance, Manhattan and beyond! We can't let this place fall apart and then get stuck in litigation for the next 20 years. We need changes and we need them sooner than later! Today is a perfect example of why.

To Naja's, The Slip Bar and Restaurant, Paddle House, Basq Kitchen, King Brewing, Quality Seafood and all the other business along the International Boardwalk: We hope everything is OK and we will do everything to help push this forward. Our thoughts are with you!!

Response to Comment PC013-2

As noted in Response to Comment PC013-1 above, Section 3.8, Hydrology and Water Quality, of the Draft EIR addressed in detail the current flooding and sea level rise at the project site. The proposed project includes project elements to minimize impacts of future flooding and sea level rise. The comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC014 LISA MCGINTY

Comment PC014-1

I support the upgrading of the Redondo Pier by Cal Center.

Response to Comment PC014-1

The commenter states an opinion/preference relevant to the project approval; your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC015 JOANNE GALIN

Comment PC015-1

I am a Redondo resident and I am totally in favor of the waterfront revitalization.

I just heard of the damage done by high tides to the businesses on International Boardwalk. It's terrible for these businesses.

Please please let me know what ever I can do to help get this project going. We need it!

Response to Comment PC015-1

The commenter states an opinion/preference relevant to the project approval; your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC016 STEVE RASAK

Comment PC016-1

I met you today at Crowne Plaza and you were kind enough to speak with me about the small craft boat ramp location. I asked if you had driven along Yacht Club Way to Mole A to make your own assessment of how a vehicle trailing a boat to the ramp could be negotiate the turns, bends and guard gate. Another gentleman was there and commented how difficult it was for him to get his trailered boat along that route, and that he had to back up to manipulate his vehicle and trailer to get through the roadway. I hope you will personally drive the route from Harbor Drive to the proposed Mole A ramp site so you can have an understanding what that might look like if you were hauling a boat and trailer and if you are concerned enough to do so, email me back and let me know what you discovered during your own inspection of the possible route for a new ramp.

Response to Comment PC016-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A. (See Draft EIR, Chapter 4, Analysis of Alternatives - Alternative 8.) The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a through 4-5c, the Alternative 8 – Mole A options include a 60-foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A.

Comment PC016-2

I also thought you might like an image of what the winter waves and surge look like in the very spot where a public ramp is being considered. See the images attached. If you zoom in you will see a man in a blue jacket and his small white dog. They were both washed into the harbor by the wave. I am happy to report both survived and were retrieved from the harbor waters.

Were you aware the city was sued and recently settled the law suit by someone in the area of the break wall who was injured by wave action? Did you know that the Yacht Club that has docks in the area removes the docks every December and then restores the docks in late March in order to protect them from storm damage during the winter when waves routinely rise above the break wall and into the area where the alternative Mole A ramp site is being considered.

Response to Comment PC016-2

Thank you for the photographs. See Master Response #8: Boat Ramp in King Harbor regarding surge at Mole A. The photographs along with your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC016-3

Why isn't Mole B at the north end under consideration as well? Portofino Way is a straight shot to the water where a ramp could be located and angled sufficiently to not point boats directly into the channel.

Using the south end of Mole B would cost slips and be too near the Harbor Building. But why not the north end?

Thanks for reading my comments, and I hope you care enough about this project to investigate what I have raised here.

Response to Comment PC016-3

Please refer to Master Response #8: Boat Ramp in King Harbor regarding why Mole B was eliminated from further consideration.

Comment PC016-4

[For the two photos included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC016-4

Please refer to Response to Comment PC016-2.

COMMENT LETTER NO. PC017 BARBARA EPSTEIN

Comment PC017-1

I'm Barbara Epstein, Redondo Beach I oppose this project.

When we sold our house in Palos Verdes in order to downsize a few years ago, we moved to Redondo Beach in order to enjoy the waterfront. We had been driving down here to do our walking for years, appreciated the improvements that were taking place along the Esplanade and on the pier, and thought that the rest of the waterfront would be upgraded, as well. We still walk to the pier and around the waterfront almost daily, not just for the vital physical exercise, but also for the general enjoyment of being in the fresh air, and watching the sky, the fishermen and checking the wildlife.

We eagerly joined the series of public workshops that took place that year, thinking our ideas were honestly wanted and would play a part in the future of the waterfront. We were happy to put in the time and effort, to stop what we were doing and run to these meetings. It seemed like such an important contribution that we could make to our new city.

The result of the workshops was pretty much a consensus that most of us citizen planners envisioned a recreational paradise for boating, bicycling, skating, rollerblading, fishing, paddle-boarding, walking, and diving, along with passive enjoyment of views, fresh air, and just relaxing in open spaces, the centerpiece of our thinking.

The participants expressed their wishes for better little boutique restaurants with healthier menus, a public market like Pike's Place in Seattle, and a bridge to connect the two ends of the waterfront.

The Citizen Planners made it very clear and were strongly adamant that there be no connecting street in the area of the International Boardwalk and no public car traffic, but would be fine with an old fashioned electric trolley connecting the two ends of the little harbor. A small business service road under the parking structure seemed acceptable.

The planners seemed pretty satisfied with the "boutique hotel's "original design. I asked for a carousel to be included somewhere in the plan.

Most people saw no value in a movie theater, considering it inappropriate at the waterfront.

I heard no one say they favored a high parking structure at the site. They voiced opposition to that.

The people at these meetings made it clear that they did not want the site crowded with a lot of buildings, but valued a lot of open space.

When this project came before the council for the vote to enter into the MOU the citizen planners were blindsided by the dramatic changes that they saw in the new plan. Everything they said they did not want was suddenly, and without notice, changed, included, and quickly voted on.

This result left many residents in shock. The citizen planners suddenly realized they had been manipulated by their own city government to collaborate with a corporation that sought to privatize our valuable public land for their own profit, failed to produce three dimensional models as promised at public meetings, and engaged in predatory business practices through fraud and deception.

The people of Redondo Beach deserve better representation by their elected officials. The wishes of the business community are important, but not to the exclusion of common sense and common decency.

Redondo Beach has other options. Gifting away our waterfront to a private business for ninety-nine years is not one of them.

We can consult many land conservancies to help us to preserve and improve our public land for the public, not for private profit.

Response to Comment PC017-1

A majority of the items the commenter notes that the citizen planners envisioned for the site are part of the proposed project (i.e., boating, bicycling, skating, rollerblading, fishing, paddle-boarding, walking, open space, and other passive uses, as well as the pedestrian bridge to connect the two ends of the waterfront). As detailed in the project objectives (Section 2.2 in Chapter 2, Project Description of the Draft EIR, page 2-14), the project proposes to:

- Optimize the full potential of approximately 36 acres of the Redondo Beach Waterfront (see Figure 2-3 of the Draft EIR) 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.
- Reestablish a vibrant Waterfront destination that serves the local community and attracts residents and visitors by providing a viable and cohesive mix of distinctive first class water and landside amenities that support and augment a variety of year-round coastal-oriented recreational opportunities.
- Increase net financial return to provide for the repair and replacement of aging and obsolete infrastructure (e.g., Pier Parking Structure), improvements to operational on-site 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.

- 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.
- Leverage a public-private partnership that generates sufficient revenues to support a coordinated revitalization of the Waterfront.
- 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.
- 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.
- Continue to preserve the tidelands and submerged lands granted to the City of Redondo Beach for the benefit of all citizens of California for purposes consistent with the Public Trust Doctrine.

As for the appropriateness of the movie theater (e.g., specialty cinema), please refer to the Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. For information on the parking structure and parking at the site, refer to Master Response #7: Waterfront Parking.

As addressed in Section 2.1.1.5.8 in Chapter 2, Project Description of the Draft EIR (page 2-12), the Local Coastal Plan (LCP) and General Plan amendments adopted by the City Council between 2005 and 2010 (including the 400,000 net new square foot development cap), were then submitted and approved by the voters of Redondo Beach in 2010 (Measure G). Measure G established with certainty all land use controls and property development standards for the waterfront. As detailed throughout Section 3.9, Land Use and Planning, the proposed project is consistent with what was approved by the voters in 2010 and the certified LCP. As discussed in Draft EIR Section 2.1.1.5.8 in Chapter 2, Project Description, the 400,000 square feet proposed in Measure G was a reduction from the 750,000, which was originally proposed. The City also contemplated parking structures when it was proposed the zoning in 2008. As discussed in the April 8, 2008 report prepared for the City Council public hearing on the zoning for the project site: “Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area.” (April 8, 2008 Administrative Report, page 26.)

The commenter has provided general information that does not introduce new environmental information or directly challenges the information presented in the Draft EIR; therefore, the comments are acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC018 MATTHEW UDEWITZ

Comment PC018-1

My client currently has a view of the rocks infront of their property, the berm infront of the Lagoon. How do you expect to protect our view from the Village?

Response to Comment PC018-1

Please refer to the Master Response #9: Views and Scale of Development. The Draft EIR provides an analysis of public views in Section 3.1, Aesthetics and Visual Resources, under the threshold AES-1 addressing "designated local valued view available to the general public", and which includes a graphic showing maximum building heights throughout the project site. However, private views are not designated a local valued view available to the general public. (See also *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492-493 [upholding EIR which determined that impacts were less than significant because impacts on plaintiffs' private views did not constitute a significant impact because no substantial adverse effect would occur on a designated local valued view available to the general public].) Please see Draft EIR Section 3.1.2.3.4 for the selection process for local valued views available to the general public. However, the project will be subject to the City's Design Review process contained under RBMC Section 10-5.2502.

In addition, per CEQA Guidelines Section 15204 (a), CEQA and CEQA case law has held that the lead agency is not obligated to undertake every suggestion given them, provided that the agency responds to significant environmental issues and makes a good faith effort at disclosure.

COMMENT LETTER NO. PC019 WENDY OIKAWA & TOM MUSHANEY

Comment PC019-1

Like many other Redondo residents we tend to go to Hermosa Beach pier area. We would like Redondo to develop our pier to make it a more inviting and interesting destination. The current plan looks interesting and we would support it.

Response to Comment PC019-1

The comment does not address an environmental issue. The commenter states an opinion/preference relevant to the project approval. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC020 CONNIE ABELA

Comment PC020-1

I would like to understand 'who' and 'how' determined level of impact of noise and environment, etc.

Response to Comment PC020-1

CDM Smith assisted the City of Redondo Beach in the preparation of the Draft EIR, which included providing technical assistance in evaluating potential noise impacts associated with the proposed project. In addition to CDM Smith, other participants in the preparation of the Draft EIR are identified in Chapter 7, List of Preparers of the Draft EIR.

Section 3.10.4.1 in Section 3.10, Noise of the Draft EIR (beginning on page 3.10-19) describes the methodology used in identifying and evaluating potential noise and vibration impacts associated with construction and operation of the proposed project. Similarly, the analyses of other environmental topics addressed in the Draft EIR, starting with Section 3.1, Aesthetic and Visual Resources, and extending through

Section 3.14, Utilities, each include a description of the methodology used in identifying and evaluating potential environmental impacts related to the subject area.

Comment PC020-2

I believe that seaview corridors will become cement corridors

Response to Comment PC020-2

The commenter's opinion is noted. Please see Section 3.1 of the Draft EIR for analysis of aesthetic impacts. Please also refer to the Master Response #9: Views and Scale of Development.

Comment PC020-3

My condo (I have lived in 14 years) backs onto Pacific Ave. The connection to Torrance will not only make a significant impact to noise but only security issues for the residents who pay significant property taxes.

Not only will I need to pay for new sound proof windows, my condo association will need to pay for security to prevent people from parking at our property.

Response to Comment PC020-3

As detailed throughout Section 3.11, Public Services of the Draft EIR, in addition to a relocated Pier Sub-Station (the police sub-station currently located at the site), the proposed project would include on-site private security and security measures to increase site safety, including architectural design (e.g., placement of doors, windows, and staircases to minimize blind spots) nighttime security lighting, security cameras, and providing lighted landscaping that allow for clear sight lines by security personnel and security devices to monitor the site. With the proposed project, the security is anticipated to be better than under existing conditions.

The commenter indicates their address is located at 110 the Village, which is represented by noise measurement location No. 3 (office/commercial and residential uses along Pacific Avenue between Catalina Ave and Harbor Drive). Based on the traffic modeling analysis completed for the proposed project, it is anticipated, that with implementation of the project, a portion of traffic that currently uses Pacific Avenue for southbound traffic would shift to Harbor Drive, thereby reducing traffic volumes on the existing segment of Pacific Avenue. The table below, patterned after Table 3.10-9 of the Draft EIR, shows that the projected change in noise levels along the existing segment of Pacific Avenue, which indicates that there would not be a significant noise impact. Concerning the potential noise impacts along the new segment of Pacific Avenue (i.e., the Pacific Avenue Reconnection between Harbor Drive and Torrance Boulevard), the noise analysis associated with Impact NOI-3 presented on pages 3.10-31 through 3.10-33 of the Draft EIR concludes that noise impacts along that segment would be less than significant. This noise measurement location would not be significantly impacted by operation of the project, as demonstrated in Table 3.10-9.

Roadway Noise Level Change on Existing Pacific Avenue Due to Project Operations-Related Traffic

Roadway	Nearest Noise Monitoring Location[1]	Estimated Existing CNEL (dBA)[2]	Existing ADT[3]	Existing + Project ADT[4]	Project-Related Change in CNEL (dB)[5]	Significance threshold in CNEL (dB)[6]	Does Project Increase Exceed Allowable Increase?
Pacific Ave. between Catalina Ave. and Harbor Dr.	3	60	4,000	1,510	-4.2	2	No

Source: CDM Smith, 2016

Notes:

1. See Figures 3.10-1a and 3.10-1b of the Draft EIR
2. See Table 3.10-2 of the Draft EIR
3. ADT – Average Daily Traffic
4. Project ADT estimated based on PM Peak Hour traffic, which represents approximately nine percent of the ADT, as determined through traffic counts in the local area, and the distribution of project-related traffic onto the local roadway system, as determined through the traffic modelling data provided by Fehr & Peers.
5. Increase in CNEL based on 10 LOG ([Project-related ADT + Existing ADT]/Existing ADT)
6. Allowable increase in CNEL based on Table 3.10-7 of the Draft EIR

Relative to the concern about parking, the commenter's residential parking is gated. Please also see Draft EIR Section 3.13, Traffic and Transportation, and Master Response #7: Waterfront Parking for discussion of parking.

Comment PC020-4

I understand and accept that we need to have change and development but I would like to ask that development is not considered just for the public but also the residents that pay a lot of property taxes.

Response to Comment PC020-4

The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC021 PETE LOCKWOOD

Comment PC021-1

I felt the presentation was done well and organized. I especially like the pedestrian bridge, is quite awesome and is an iconic centerpiece. Please keep up the good work on this much needed project for the increasing the beauty of Redondo Beach.

Response to Comment PC021-1

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC022 MAGGIE HEALY

Comment PC022-1

As a nearby resident, I would like to hear more about how parking + traffic for the Pier will be improved.

My street is an egress route when Torrance Blvd is jammed.

Also, if parking rates are not kept very low + affordable – people will take all the parking on my street. This happens frequently in summer + it makes it difficult for my family + friends to visit.

Response to Comment PC022-1

Please see Draft EIR Section 3.13, Traffic and Transportation, for discussion of parking and traffic. Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC022-2

Also, if parking rates are not kept very low + affordable – people will take all the parking on my street. This happens frequently in summer + it makes it difficult for my family + friends to visit.

Response to Comment PC022-2

Please see Draft EIR Section 3.13 for discussion of parking.

COMMENT LETTER NO. PC023 ANONYMOUS

Comment PC023-1

I represent us all at the village. How are you proposing to protect my specific current view real estate. I can see the top of the rocks of the berm in front of the lagoon. Protect my view 101.

Response to Comment PC023-1

Please see Response to Comment PC018-1.

COMMENT LETTER NO. PC024 MICKEY MARRAFFINE

Comment PC024-1

Please rebuild the Sportfishing Pier.

Response to Comment PC024-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC025 RESIDENT

Comment PC025-1

I really feel this project will be an asset for Redondo Beach

Traffic wise it is not going to effect work traffic

190th will be feeder street and it is not busy on the weekends

I also hope that with new infrastructure at the Waterfront we will see improvement of the water quality

Response to Comment PC025-1

Please see Draft EIR Section 3.8, Hydrology and Water Quality, for discussion of water quality. As detailed in Section 3.8, during operations, the site would comply with low impact development (LID) requirements required by the National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm System (MS4) Permit (Order No. R4-2012-0175 NPDES Permit No. CAS004001). Additionally, implementation of the proposed project would reduce the amount of paved surfaces currently at the project site; the imperviousness of the site would decrease from to 79 percent to 64 percent. During operation of the project, infrastructure improvements to water quality include the directing of runoff away from impervious surfaces and into landscaped areas, landscape features (e.g. planter boxes), or other pervious areas, which would prevent erosion and siltation from entering the storm drain system. Per the City's LID requirement, the quantity and quality of flow would be reduced by implementing best management practices (BMPs) including, but not limited to, permeable pavers, infiltration, bio-filtration planters, modular wetlands and french drains. For additional details, refer to Section 3.8 of the Draft EIR. The commenter states an opinion/preference relevant to the project approval: your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC026 DOUG CHRISTENSEN

Comment PC026-1

I am a Redondo Beach resident who lives near 190th and will be impacted by traffic to a degree, but despite some traffic Challenges that could be further mitigated by the city, I fully support the project and believe this will be incredibly successful for residents, visitors, and businesses.

In terms of traffic, I would like to see how the city would mitigate the issue when traffic hits a certain volume assuming the project becomes more and more attractive to visitors outside the area.

Response to Comment PC026-1

Please see Draft EIR Section 3.13, Traffic and Transportation, for discussion of traffic, which assumes a fully operational project. Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. The commenter states an opinion/preference relevant to the project approval: your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC027 SIONE TAUFA

Comment PC027-1

We have concerns for existing vendors on the pier. 1st: We would ask for a temporary venue during construction, to maintain our customer base + our income. 2nd: We ask for first choice on new shop spaces for existing businesses. 3rd: I appreciate the need to upscale the area – however, we are not large corporations – we would ask for rent comparable to what we are currently paying. Of course continuing to give a percentage of our income, as our income fluxuates with the summer season.

Response to Comment PC027-1

Refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site for information on existing businesses. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC027-2

We need more security or police presence during business hours to encourage local residents to feel safe. In 14 years I can count on my fingers how many times we have seen either.

Response to Comment PC027-2

As detailed throughout Section 3.11, Public Services of the Draft EIR, in addition to a relocated Pier Sub-Station (the police sub-station currently located at the site), the proposed project would include on-site private security and security measures to increase site safety, including architectural design (e.g., placement of doors, windows, and staircases to minimize blind spots) nighttime security lighting, security cameras, and providing lighted landscaping that allow for clear sight lines by security personnel and security devices to monitor the site. With the proposed project, the security is anticipated to be better than under existing conditions.

COMMENT LETTER NO. PC028 BOYD BAKER

Comment PC028-1

I live in the Riviera Section of Redondo.

I love the plans – full steam ahead.

I think everything about the proposal is an improvement.

Thanks!

Response to Comment PC028-1

The commenter states an opinion/preference relevant to the project approval. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC029 MICKEY TURNER

Comment PC029-1

I am in full support of the project! As a realtor I know the current Pier and surrounding areas are a negative factor to property values. As a resident since 1975 I would like to be able to enjoy my City!

Response to Comment PC029-1

The commenter states an opinion/preference relevant to the project approval. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC030 GERRY O'HAGAN

Comment PC030-1

Would like to see the project (AS IS) according to EIR. How do we speed it up or least combat the opposition to it.

Willing to Help out.

Response to Comment PC030-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC031 ANONYMOUS

Comment PC031-1

In your video you had a child fishing, but what you show is someone who is not using the equipment backwards.

Response to Comment PC031-1

The commenter states an opinion that is outside the purview of an EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC032 ROBBIE MEISTRELL

Comment PC032-1

Any demolition of parking structure should be used as an artificial reef.

Same with AES when it comes down.

Response to Comment PC032-1

As described in Section 2.5.1.1 of the Chapter 2, Project Description of the Draft EIR (page 2-86), demolition activities associated with the landside construction involve removal of existing structures, asphalt pavement, concrete sidewalks, parking lots/structures, and associated infrastructure. Concrete from demolition (such as from the Pier Parking Structure) would be mechanically crushed on-site and the material used as fill on-site. The proposed project would not modify AES' property.

COMMENT LETTER NO. PC033 ROBBIE MEISTRELL

Comment PC033-1

Build it already!

Lets get it going

Response to Comment PC033-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC034 PENNY WIRSING

Comment PC034-1

I've been very impressed with the information provided by the developer. My husband and I had a few questions but they're all been answered to our satisfaction.

I'm really excited about this project and can't wait for it to progress!

Response to Comment PC034-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC035 JOSEPH CHUN

Comment PC035-1

Suggestions:

1. Bench mark.myungdong, or Apgujungdsong.city of seoul.southkorea
2. No Cars in Torrance Blvd – Catalina – Herondo Boundy [sketch provided] X Beyond Harbor all cars detour to Herondo to PCH

Benefit

A. Attract more people to walk shopping, eating …

B. People feels festive mode

C. More shopping and eating

D. Triple Revenue or more (more sale – mor tax collected)

X a lot of cities in the world bench marked, Seoul Korea

Response to Comment PC035-1

A substantial number of existing uses (both on and off the project site) use this area for vehicular access to their private property, and restrictions on vehicle access in this area are therefore considered legally, economically, and socially infeasible. Making the zone described in the comment carless, would substantially limit or eliminate the ability for these parcels to be accessed by vehicles of all kinds, including both privately operated vehicles, as well as buses. The comment does not introduce new environmental information, nor does it directly challenge information presented in the Draft EIR.

COMMENT LETTER NO. PC036 JUSTIN MILLER

Comment PC036-1

I love everything! Looks fantastic. Keep up the good work!

THX.

Response to Comment PC036-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC037 BRUCE SZELES

Comment PC037-1

Too much! Reduce the size and scope of this project! Where is the study that was to be included to reduce the size of the project? What pages in the EIR? Scale this back!

Thank you!

Response to Comment PC037-1

Please see Draft EIR Section 2.1.1.5.8 in Chapter 2, Project Description for discussion of the history of the City's cumulative development cap for the Harbor/Pier area, which was originally proposed at 750,000 square feet and reduced to 400,000 square feet. Chapter 4, Analysis of Alternatives of the Draft EIR addressed several alternatives to the proposed project. Alternative 7 – Reduced Density was analyzed starting on page 4-244. Under this alternative, the amount of net new development on the site would be reduced by 50 percent (152,029 square feet). This would result in a total of 371,910 square feet of development at the project site (which equals an approximately 29 percent reduction in total square footage as compared to the proposed project). The proposed uses of retail, restaurant, creative office, hotel, and specialty cinema would be the same as the proposed project as under Alternative 7, and as shown on Figure 4-3 (page 4-245 of the Draft EIR), the conceptual site plan would be similar to the proposed project, but some buildings would be eliminated or

reduced in size. The other main elements of the proposed project, including improvements in site connectivity and modification of Seaside Lagoon, would be implemented.

COMMENT LETTER NO. PC038 GENNARO PUPA

Comment PC038-1

1) Why do we need a 700 person-sized movie theatre. Seems excessivel large to me.

Response to Comment PC038-1

The 700-seat specialty cinema proposed at the project site is a relatively small theater as compared to typical multiplex cinemas. Refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site for more information on the proposed specialty cinema. Additionally, one of the project objectives is to reduce seasonality. As discussed in the City Council's April 8, 2008 Administrative Report for the zoning amendments, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors."

Comment PC038-2

2) Will there be a permanent police substation in the new design. The pier currently has one.

Response to Comment PC038-2

As noted in Chapter 2, Project Description and detailed throughout Section 3.11, Public Services of the Draft EIR, the Pier Sub-Station (the police sub-station currently located at the site) will be relocated somewhere on the project site. The precise location of the relocated police sub-station would be part of final project design.

Comment PC038-3

3) Where will the additional money come from to support increased staffing of police, fire, and other first responder teams come from?

Response to Comment PC038-3

As addressed in Section 3.11, Public Services of the Draft EIR, although the proposed project includes an increase in square footage, based on existing staffing and facilities that would service the project site, no additional firefighting personnel or equipment to respond to fire or health emergencies at the project site than is currently being provided would be required (in other words, the Redondo Beach Fire Department would be able to accommodate proposed project without the provision of additional staffing and facilities). The proposed project includes the replacement of the police sub-station on-site. These police protection services would be provided through the continued implementation of the City's budgeting process. In addition to increased site safety, the proposed project incorporates Crime Prevention Through Environmental Design (CPTED) strategies aimed at deterring criminal behavior by designing the physical environment in ways that reduce identifiable crime risks (as described above) and a private on-site security would be added to the project site. Therefore, with replacement of the police sub-station on-site the proposed project would not result in the need for the construction of new or physically altered police protection facilities (which have not already been considered in the Draft EIR) in order to maintain adequate services, hence, the impact would be less than significant.

COMMENT LETTER NO. PC039 SUSAN UDEWITZ

Comment PC039-1

- Lack of places for rod/real fishing from piers + land

Response to Comment PC039-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding fishing. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC039-2

- Seaside lagoon – worried about safe water for children/opening ocean dangerous/make it SAFE!!

Response to Comment PC039-2

Please refer to Master Response #4: Modifications to the Seaside Lagoon.

Comment PC039-3

- Levels of parking with parking above top level (too high)
- Level of building for boutiques (no excuses for being higher 1 ½ - 2 stories
- Keeping large views for public along the walkways

Response to Comment PC039-3

The commenter's opinions are noted. Please see Draft EIR Section 3.1, Aesthetics and Visual Resources for discussion of aesthetics. Refer to Master Response #7: Waterfront Parking for information on the new parking at the site. Please refer to the Master Response #9: Views and Scale of Development for information on the heights and views associated with the proposed project.

Comment PC039-4

- Controlling parking noise and congestion, auto fumes – see reports by Long Beach Port
- Controlling honking of delivery trucks – high noise levels now.

Response to Comment PC039-4

The analysis presented in Section 3.10, Noise of the Draft EIR determined that noise impacts related to parking and deliveries would be less than significant. Please see the operational analysis under Impact NOI-1 in Section 3.10 for additional details. Under CEQA, mitigation is not required for impacts that are less than significant; however, the City of Redondo Beach is proposing a condition of approval for the project that pertains to parking noise. Condition of Approval COA NOI-1: Parking Area/Structure Design, presented on pages 3.10-3 and 3.10-27 of Section 3.10 of the Draft EIR, requires that parking areas and structures proposed by the project in proximity to noise sensitive uses be designed to include buffers and/or other shielding by walls, fences, or

adequate landscaping, to reduce noise exposure to nearby noise sensitive receptors. The subject condition of approval also identified other design measures such as the use of materials that reduce sound transmission, the configuration of interior spaces to minimize sound amplification and transmission, or other suitable and appropriate means to reduce noise to nearby noise sensitive receptors.

As for auto fumes, please see Section 3.2, Air Quality of the Draft EIR.

Regarding the control of vehicle horns, such control is a law enforcement issue set forth in Section 27000 through 27007 of the California Vehicle Code. As shown on Figure 2-22 (Chapter 2, Project Description, on page 2-79 of the Draft EIR), designated service and loading areas would be located on the northern and southern portions of the site. These service and loading areas are designated to be close to the businesses that they are serving; therefore, honking from delivery trucks is not reasonably foreseeable. In addition, these areas will be partially enclosed and screened, which would further reduce any noise from these areas to nearby noise sensitive receptors.

Comment PC039-5

- Public need = keep current views for Seascape II condominiums

Response to Comment PC039-5

The Draft EIR provides an analysis of public views in Section 3.1, Aesthetics and Visual Resources, under the threshold AES-1 addressing "designated local valued view available to the general public." However, private views are not considered a local valued view available to the general public. Please refer to Response to Comment PC018-1. Please refer to the Master Response #9: Views and Scale of Development for information on the heights and views associated with the proposed project. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC039-6

= Replant trees now in park

Response to Comment PC039-6

Section 3.3, Biological Resources of the Draft EIR addresses impacts to terrestrial biological resources, including the removal of existing ornamental trees and other landscaping in areas that would be altered or modified as a result of the project. Compliance with the Coastal Land Use Plan and City tree trimming and removal ordinances would avoid adverse impacts to terrestrial biological resources; therefore, impacts from construction or operation of the proposed project would be less than significant.

Comment PC039-7

*= Fund doublepaned windows for condos that will be affected by additional noise from bicyclists, cars, trucks, pedestrians

Response to Comment PC039-7

The analysis presented in Section 3.10, Noise of the Draft EIR determined that noise impacts associated with operation of the proposed project would be less than significant, with the exception of the increase in existing

ambient noise levels associated with vehicle traffic along Torrance Circle/Boulevard between the project site and Catalina Avenue (the commenter's residence, at 140 The Village, would not be significantly impacted by noise from the operation of the project).

Regarding the project-related noise impact along Torrance Circle/Boulevard between the project site and Catalina Avenue, that significant impact would occur because of an estimated 4.5 dB increase in existing outdoor ambient noise levels (approximately 60 dB) along the roadway attributable to increased vehicle traffic associated with the proposed Pacific Avenue Reconnection. While the 4.5 dB increase in existing outdoor ambient noise level would exceed the applicable threshold of significance, defined in Section 3.10.4.2 of the Draft EIR as being 2 dB, it should be noted that the resultant Community Noise Equivalent Level (CNEL) of 64.5 dB would be within the City's acceptable noise exposure level for residential development (i.e., would be less than 65 dB CNEL). As such, existing residential development located near that roadway segment would not be exposed to unacceptable noise levels. Additionally, these noise levels calculations apply to exterior/outdoor noise levels, and do not reference interior residential noise levels, consequently installation of windows would not alter this significance conclusion. Additionally, it should be noted that the outdoor-to-indoor noise reduction level typical for residential buildings is typically at least 20 dB (i.e., outdoor noise level of 64.5 dB would be reduced to approximately 44.5 dB indoors). This is also consistent with California Building Code, which requires installation of noise insulation for residential developments. Notwithstanding that the future noise levels along the subject roadway segment would be within noise exposure levels considered acceptable for residential development, it should also be noted that construction of a noise barrier along the roadway segment to shield nearby residential development from the project-related 4.5 dB increase is not feasible. Based on the elevation relationship between the road segment and the nearby multi-story residential buildings, constructing noise wall/barrier that would break the line-of-sight between the road and the residential buildings, thereby providing an approximately 6 dB reduction, would need to be approximately 39 feet tall to shield the residential building that is the closest and tallest relative to the roadway segment. For other residential buildings in the nearby area that are lower in height, it is estimated that a noise wall/barrier would need to be approximately 31 feet tall. The installation of such a noise wall would result in visual/aesthetic concerns that the adjacent residential occupants would consider unacceptable, both from the roadside perspective as well as from the residential buildings perspective including loss of private views to the west and southwest (i.e., the bay). Furthermore, such a wall is not considered feasible due to costs, constructability, and long-term maintenance.

Comment PC039-8

- Do not need theaters!

No "Megamall"

- provide 3D models so we can see more clearly.

Response to Comment PC039-8

Refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site for more information on the proposed specialty cinema. As for the commenters request for a 3D model, refer to Response to Comment PC008-1.

Comment PC039-9

- violates sequa (?)

Response to Comment PC039-9

The Draft EIR was prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (State CEQA Guidelines). (14 California Code of Regulations [CCR] Section 15000 et seq.)

Comment PC039-10

we'll need more lanes going in & out of area

Response to Comment PC039-10

Regarding general concerns regarding traffic associated with the proposed project, refer to Draft EIR Section 3.13, Traffic and Transportation, and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC039-11

Be honest with us.

- Listen to the residents + compromise

Response to Comment PC039-11

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC039-12

Keep cinema to 2 story!

Response to Comment PC039-12

The conceptual plans for the project site (refer to Figure 2-8 on page 2-49 in Chapter 2, Project Description of the Draft EIR) place the specialty cinema in the northern portion of the project site adjacent to the proposed parking structure and on the eastern side of the new main street, which does not interfere with the pedestrian experience of the waterfront. As discussed in Section 3.9, Land Use, the number of stories and building height would comply with the requirements of the Coastal Zoning and other development regulations, which allow buildings to be a maximum of height of 45 feet and maximum of 3-stories at this location. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC040 CHRIS WACES

Comment PC040-1

Trees! Park! Open Space Please!!

Response to Comment PC040-1

As noted throughout the Draft EIR (particularly Chapter 2, Project Description and Section 3.12, Recreation), the proposed project includes enhanced public open space including expanded boardwalk along the water's edge and pedestrian and bicycle pathways. While overall the amount of open space within the site boundaries would remain similar to the existing conditions, the quality of the open space would be significantly enhanced by the addition of features such as new landscaping, lighting, benches, a decorative fountain and centrally located public gathering spaces. Further, the new open spaces are integrated into the overall site design to provide more useable and visually pleasing spaces promoting high quality design to enhance active and passive use and enjoyment of the outdoor environment by residents, visitors and families, and complement the natural beauty of the harbor and Santa Monica Bay. Landscaping (including trees) will also be an integral part of the enhanced project site.

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC041 REGGIE THOMAS

Comment PC041-1

Support

Response to Comment PC041-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC042 JOANNE GALIN

Comment PC042-1

I support & want to speak

Response to Comment PC042-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC043 YVONNE VICK

Comment PC043-1

I am in support of the project and am not able to stay to speak at this meeting

Response to Comment PC043-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC044 JOAN IRVINE

Comment PC044-1

I support the project

Response to Comment PC044-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC045 CHRIS VOISEY

Comment PC045-1

"I support this moving forward!"

Response to Comment PC045-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC046 THOMAS GRAY

Comment PC046-1

I support the project but have to go back to work

Response to Comment PC046-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC047 BETH METZGER

Comment PC047-1

(I am unable to speak today)

I fully support the Waterfront Project. I look forward to seeing the Waterfront & Pier areas revitalized, something that is long over due

Response to Comment PC047-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC048 JANE DIEHL

Comment PC048-1

~~Not~~ speaking - but supporting project

Response to Comment PC048-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC049 JOYCE STEPANEK

Comment PC049-1

My husband and I have lived in South Bay for over 35 years and have always loved spending time at Redondo Pier and having lunch at Polly's. The feel of being at the small pier and our Polly's in from the past. The food is wonderful – good grub at a good price. We would be so sorry to see a renovation of this quaint little pier that would remove the character and ambience of the Redondo Beach Pier area.

Response to Comment PC049-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC050 GERRY O'HAGAN

Comment PC050-1

Support CenterCal Project!! Had to leave early

Response to Comment PC050-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC051 JEWEL & TOM MUSANTE

Comment PC051-1

It would be so sad to see the fisherman's pier and Polly's meet their demise. This has been such a special place for locals such as ourselves to meet and enjoy the old school ambiance of the South Bay. Do we really need to sterilize our south bay even more. Let use know if there is anything we can do to help the cause. This is our favorite place to eat and meet our friends.

Response to Comment PC051-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's

decision-making body.

COMMENT LETTER NO. PC052 TAYLOR WOLFSON

Comment PC052-1

Hope all is well. Attached is a set of comments we received at an event we hosted over the weekend that we wanted to forward to your attention. Please let me know if you have any questions or concerns.

Response to Comment PC052-1

The comments attached to the email are Comments Letters PC053 through PC074 below.

COMMENT LETTER NO. PC053 KARA VOISEY

Comment PC053-1

Your show is amazing! Thank you for putting me on it!

Response to Comment PC053-1

The commenter states an opinion/preference relevant to the project that is outside the purview of an EIR. Your opinion will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC054 BONNIE NIXON

Comment PC054-1

This project is magnificent. I hope the community can embrace its in all its beauty

Response to Comment PC054-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC055 JANE BAKERNIK

Comment PC055-1

Wonderful Video! I am totally supportive of "Waterfront" and I am here to help in any way I can!!!

Response to Comment PC055-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC056 GIAN ISHMO

Comment PC056-1

The revitalization of the waterfront is just what this community needs to keep Redondo Beach a thriving place where people want to go.

Response to Comment PC056-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC057 JUAN FORTEZA

Comment PC057-1

Let's get it built!

Response to Comment PC057-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC058 CHRISTINE WINKLER PH D

Comment PC058-1

Great presentation + vision for a spectacular new experience in the city

Response to Comment PC058-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC059 JULIE COLL

Comment PC059-1

There is a real need in this harbor for dry storage & public access docks.

Response to Comment PC059-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC060 TERA GUTHRIE

Comment PC060-1

I've been telling my teenager daughter to go around the the pier area. I would love nothing more to tell her & her friends to go hang out at the pier some day.

Response to Comment PC060-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC061 ERIK BOWMAN

Comment PC061-1

Traffic: self driving cars?

Response to Comment PC061-1

The commenter states an opinion that is outside the purview of this EIR. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC062 DEBORAH SHEPARD

Comment PC062-1

I'm so excited about Center Cal's plan to responsibly revitalize the waterfront. From a former resident and tourist's point of view. This makes cultural, economic and environmental health.

Response to Comment PC062-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC063 ANGELA MAILLOUX

Comment PC063-1

I am very supportive of the project and would like to become involved at some capacity.

I lived in Santa Monica for 25+ years and saw it become a crowded, commercial city, no longer speial.

I believe Redondo Beach can be updated an improved, yet stay the special place that it currently is – the Waterfront looks like that vision!

Response to Comment PC063-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC064 LISA SHEFFIELD

Comment PC064-1

I support the project – well done!

Response to Comment PC064-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC065 JUDITH OPDAHL

Comment PC065-1

Love the video + can hardly wait until approved + break ground.

Response to Comment PC065-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC066 TIM HALLISSEY

Comment PC066-1

I support the Waterfront Project looking forward to the under 21 attraction.

Response to Comment PC066-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC067 HEIDI BUTZINE

Comment PC067-1

The Waterfront project has so much opportunity to bring revenue, a sense of place, & character to the city of Redondo Beach.

I support the waterfront project for the future of the success of our community.

Thank you CenterCal!

Response to Comment PC067-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC068 STEVE GOLDSTEIN

Comment PC068-1

I am so excited by this. I can't wait to see it become a reality. I pledge to do all I can to help see it to fruition.

Thank You!

Response to Comment PC068-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC069 ALLEN VICK

Comment PC069-1

Great video. I really appreciate the work your team is doing on this project and I support it.

Response to Comment PC069-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC070 JOANNE GALIN

Comment PC070-1

I am very excited!

It is NOT a mall!

Response to Comment PC070-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC071 GRETA WORTMAN

Comment PC071-1

Love the video. Have lived here in RB for almost 3 years now directly above the pier and am so excited for the future of it. So much potential and CenterCal has a wonderful vision and quality to it. I cannot wait to see it become a reality.

Response to Comment PC071-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC072 YVONNE VICK

Comment PC072-1

I totally support this project to reconnect our families to an improved Waterfront where we can all hang out!

I would be happy to host a coffee/wine at my home.

Response to Comment PC072-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC073 KATHY ROGERS

Comment PC073-1

It is about time!

Response to Comment PC073-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC074 PAT DACY

Comment PC074-1

You stated your aim is "boutique" businesses in the Retail Mix. Mom & Pop) Will "Local" owned" boutique businesses be able to afford to be in or stay in the complex. Large National Brands are taking over Manhattan Beach due to high rents. How will you avoid this in the development, especially when those national brands are spinning off 'boutique" names. They are still large Corporate Brand Stores.

Response to Comment PC074-1

Although the type of businesses that may become tenants at the project site is not a CEQA issue, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for discussion of the potential businesses at the project site. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC075 GORDON STEWART

Comment PC075-1

My wife and I visit the area from Virginia several times a year, keeping up with a daughter and her family and enjoying the very special places of Redondo Beach and Hermosa Beach. We regularly have breakfast at Polly's on the pier, I go fishing with my grandson at the same place, and at night we light to have drinks at Kincaid's or one of the nearby establishments

This morning at breakfast, again at Polly's, we learned for the first time of the initiative to re-conceive the waterfront. There may be many advantages to the project, but one concern prompts me to write, that being the apparent exclusion of Polly's pier from the design. People at Polly's and next door at the fishing shop tell me they have not been included and, worse yet, they suspect there's soon to be approved a new Redondo Beach without them.

As anyone who frequents Polly's knows, it's the ambience of a long established eatery and the family atmosphere, not just its location, that contribute to its charm and thereby adds to the appeal of Redondo

Beach for its many visitors. I write to encourage you and the other planners and decision makers to keep Polly's and its pier in the picture of future development. It would be such a loss for Redondo Beach and the area to lose this place we have come to enjoy and frequent so often.

Thanks for listening and for sharing these thoughts at the meeting coming up soon which will include public comment.

Response to Comment PC075-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC076 JOANNA SNODGRESS

Comment PC076-1

Wanted to share our love of Polly's and the pier, even though we're no longer residents of Redondo Beach.

Thank you

Response to Comment PC076-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC077 JIM DESALVO

Comment PC077-1

I have a question, how is it that adding new shops, hotels and various attractions will have no impact on local residents? You must be anticipating increase traffic. I would assume this would impact those of us who call Redondo home. I am aware the Pier needs to be updated but I feel there are more non-invasive ways to do this. I would appreciate hearing your responses!

Response to Comment PC077-1

Impacts associated with the construction and operation of the proposed project are summarized in Section ES.7, Summary of Environmental Impacts of the Proposed Project and Alternatives (beginning on page ES-30) in the Executive Summary associated with the Draft EIR. Although a majority of the impacts were found to be less than significant or less than significant with implementation of mitigation, the Draft EIR analysis did determine that there would be a total of six significant and unavoidable impacts of which four would occur during construction (short-term throughout the 2.25 to 2.5 years of construction), two would occur specific to the operation of the project, including one impact (i.e., tsunami hazard) that would continue at the project site (although with implementation of mitigation measure the impacts would be reduced) due to natural uncertainties of such an event occurring in the future. Table ES-5 and Table ES-6 in the Executive Summary (beginning on page ES-35) identifies significant and unavoidable impacts associated with the proposed project.

As detailed in Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, traffic was found to be less than significant with implementation of mitigation.

COMMENT LETTER NO. PC078 LORRIE KAZAN

Comment PC078-1

The future of Redondo Beach could be one that is environmentally impressive. We could create something beautiful and sustainable that will not only draw tourists but will be a landmark that inspires pride and care in the locals.

Or it could be the mall that CenterCal is currently proposing, which is destructive to our views, and catastrophic to values and lifestyles of residents. (I'll leave it for others to get into the traffic and sewage issues)

We already have Del Amo and other local malls that are designed in the current industrial fashion; they look so much the same that you could literally be in any city anywhere.

When I think of city's that were wisely planned, Paris or Rome, for example, there's beauty, history, art, a wise sense of how the streets will function together. That sense helps fuel the lives of the inhabitants.

Are we wrong to want to take the money allocated to another cookie cutter mall and create a legacy that we can live with? Maybe asking for the heart and beauty of Piazza Novana is out of the question but do we have to cater to or take inspiration and example from the lowest common denominator? I don't know if it's total greed or the people who push us so hard for these industrialized improvements really find the landscaping aesthetic.

I love living in Redondo Beach. My family first moved here in 1974. We love it because it is the beach. The Southbay has always had a kind of unique social and family atmosphere that's palpable.

I saw CenterCal's video where they spent most of it showing people who love CenterCal and want the pier to fit their vision. After wading through lots of rhetoric about how great they are, we then saw about a minute or less of the monolith they call a lifestyle (I forget the word they use with it). But it doesn't sound honest, or healthful or geared to today's inhabitants and the lifestyles of the future.

In a time when people of all ages are coming up with genius concepts to deal with global warming and other ills, is it possible that we could tap into some of that forward thinking and not simply have a group of white guys lead us into the past while presenting it as the future?

Please help us maintain our views, modernize in such a way that we enhance the quality of life rather than strip it for the greed of the select few.

Thank you

Response to Comment PC078-1

The commenter refers to the project as a “monolith” and suggests that the project should be more akin to cities such as Paris and Rome, or Piazza Novana; these locations have floor area ratios (FAR) significantly greater than the proposed project. As discussed in the City’s April 8, 2008 Administrative Report for the Harbor Pier

zoning, "Pedestrian-active commercial areas generally require higher FARS than auto-oriented centers… a low FAR may not achieve the character and amenities desired for the Harbor area, and too low an FAR is not likely to result in a pedestrian-active character." Please refer to Draft EIR Section 3.1, Aesthetics and Visual Resources for the discussion of aesthetic impacts and Master Response #9: Views and Scale of Development regarding views. As for the project being like Del Amo, it should be noted that the land use mix assumed for the proposed project is more restaurant than retail (35 percent restaurant vs 20 percent retail).

COMMENT LETTER NO. PC079 DORRIS CRAGG

Comment PC079-1

I live in Encino and don't drive at night. My condo is No.102 in the 610 building. I have the drawing that we were given when the construction plans were first announced.

I'm wondering if there will be a bridge from the Village to the ocean across the planned street that runs through the project. Please locate it for me -- I'm hoping we at the Village will at least have easy access to the pier.

If there is a new plan drawing, please send one to me -- at 16600 Calneva Drive, Encino 91436.

Thank You

Response to Comment PC079-1

The access to the project site from the Village would be similar to what exists today. Access from Czulegar Park would continue in the location of the Plaza Parking Structure. In the area of the existing Ocean Steps, access to the pedestrian and bicycle paths would be provided. Crossing across the Pacific Avenue Reconnection would occur at multiple locations. As shown on Figure 2-8 (page 2-49 in Chapter 2, Project Description of the Draft EIR), the conceptual plan shows crosswalks, from north to south, at: Beryl Street; the south entrance to the new north parking garage; the Pacific Avenue/Harbor Drive intersection (roadway leading to the new main street); Harbor Drive entrance to Plaza Parking Structure and entrance to surface parking on project site; on Pacific Avenue Reconnection along Basin 3 (near the condo pool complex); just north of Torrance Circle, where the bike path crosses Pacific Avenue Reconnection; then along Torrance Circle.

COMMENT LETTER NO. PC080 JILL BROWN

Comment PC080-1

I would like to add my comments/concerns regarding the proposed Redondo Beach Waterfront Project. I have serious concerns about so many aspects of this enormous project, but here I will address the increased traffic congestion and the impact it will ultimately have on all residents that live local to the site, as well as those that this development is expected to attract to the area. I am concerned about the the impact to our safety and quality of life, while walking, biking, or driving, and living in an area that is already stretched to its limits with vehicle congestion, as well as the impact to local air quality resulting from this enormous traffic increase.

Response to Comment PC080-1

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Please also see Draft EIR

Section 3.13, Traffic and Transportation, for discussion of traffic related issues, including safety, pedestrian facilities, and bicycle facilities. As detailed in Section 3.2, Air Quality, of the Draft EIR, air pollutant emissions associated with the operation of the proposed project, including traffic associated with employees and patrons, were analyzed for the proposed project. The analysis found that operation of the proposed project would not exceed the regional thresholds established for the operational emissions of criteria air pollutants within the air district at either the project or cumulative level. In addition, the analysis determined that during operation the proposed project would not expose sensitive receptors to significant localized concentrations of criteria pollutants, nor would the proposed project expose sensitive receptors to objectionable odors or to localized significant pollutant concentrations with respect to traffic emissions and toxic air contaminants. As detailed in Section 3.2, Air Quality, the operation of the proposed project would result in less than significant impacts, and no mitigation is required.

Comment PC080-2

In addition, to date, I have been unable to locate any specific information regarding the plan to accommodate the massive number of delivery vehicles that will be required to support the restaurants, retail, and various other businesses in a development of this size. I have found NO reference to any designated zone where they will off load their goods. With no such designated area in the plan, we must expect traffic backups during delivery times which will could occur continuously throughout the day if current pier deliveries are the model.

Response to Comment PC080-2

Chapter 2, Project Description, of the Draft EIR, describes the service and loading areas associated with the proposed project. Table 2-2 (page 2-47) gives a summary of existing and proposed conditions, with a more detailed description on page 2-78. As shown on Figure 2-22 (on page 2-79 of the Draft EIR), designated service and loading areas would be located on the northern and southern portions of the site. On the northern portion of the site, service and loading areas would be located along the proposed parking structure within the project site. In the southern portion of the project site, there would be a service and loading area to the north of the new parking structure, adjacent to and serving the hotel and retail uses. The loading and service area would be accessed from Pacific Avenue and the area partially enclosed and screened from view. The traffic analysis (Section 3.13 of the Draft EIR) assumed traffic associated with delivery and service vehicles based on the proposed land use mix, and the noise analysis (Section 3.10 of the Draft EIR, in particular see page 3.10-26) addressed the noise associated with service and loading areas and their location relative to noise sensitive receptors.

Comment PC080-3

As a 27 year resident of South Bay, I have watched and experienced the increase in local traffic that has occurred with normal growth over the years, so I have serious concerns about the traffic, congestion, and reduced air quality that an additional development with such an enormous footprint will bring.

Response to Comment PC080-3

Refer to Response to Comment PC080-1 above. As discussed in Master Response #2: Cumulative Analysis, the Draft EIR conservatively assumed traffic growth to mirror population growth, despite SCAG's projecting a two percent decrease in vehicular traffic. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR.

COMMENT LETTER NO. PC081 BARBARA EPSTEIN

Comment PC081-1

Last month I objected to the CenterCal project for many reasons:

* We came to live in Redondo Beach for the healthful exercise we enjoy on our daily walks around the pier and the waterfront, with fresh air, open spaces, views of sea, wildlife, and sky.

We do not want wall-to-wall buildings at the waterfront. The density of this project will be claustrophobic.

* We participated in several planning workshops with the unfortunate result of all of our time, energy and hard work being ignored, leading us to realize that the workshops were nothing but a sham, and we had been victims of fraud and deception by the City Council majority and CenterCal, a shopping center developer. Clearly, the City Majority represents only special real estate interests in entering into this contract, not the residents who live at the waterfront.

* The City is giving valuable public property to a private company over the objections of many Redondo Beach citizens. This is immoral and possibly illegal.

Response to Comment PC081-1

As discussed in Draft EIR Section 2.1.1.5.8 in Chapter 2, Project Description, the zoning for project site has been the subject of numerous public hearings since 2007, which included approval from the Redondo Beach Planning Commission, Harbor Commission, City Council, the California Coastal Commission, and the Redondo Beach electorate (Measure G), which decided to approve a 400,000 square foot development cap (a reduction from the 750,000 which was originally proposed). As discussed in the April 8, 2008 report prepared for the City Council public hearing on the zoning for the project site: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.) As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher FARS than auto-oriented centers… a low FAR may not achieve the character and amenities desired for the Harbor area, and too low an FAR is not likely to result in a pedestrian-active character."

Regarding the commenter's assertion that "the City is giving valuable public property to a private company," please see Draft EIR page 3.9-29 in Section 3.9, Land Use and Planning, which discusses permissible actions within the City's tidelands grant, which includes leaseholds. The comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC081-2

Today I will further object to this project: This Draft EIR is fatally flawed and should be discarded.

* Constructing a new public street for vehicular traffic will dictate that cars, trucks, and motorcycles will dominate the space between Torrance Boulevard and Harbor Drive, cutting off public access and reducing foot and bike traffic from Catalina Avenue. The public will lose the ability to walk freely from

Czuleger Park, or from the hundreds of nearby residences, to the waterfront without crossing traffic. This street presents a safety hazard and objectionable barrier for the walking public.

Response to Comment PC081-2

The access to the project site from Czuleger Park would continue in the location of the Plaza Parking Structure and from the southern area of the Village (in the area of the existing Ocean Steps). As described on page 2-71 of Chapter 2, Project Description, of the Draft EIR, and analyzed throughout the environmental analysis, a bicycle path would be located along the Pacific Avenue Reconnection (see Figure 2-19 on page 2-73) and would be an extension of the Herondo-Harbor Gateway cycle track that has recently been completed as a component of the Harbor/Herondo Gateway Improvement Project. As shown on Figure 2-20 (page 2-74 of the Draft EIR), the proposed project also includes new pedestrian pathways throughout the project site, including along the Pacific Avenue Reconnection. In addition, Section 3.13, Traffic and Transportation of the Draft EIR, details bicycle and pedestrian safety related to the proposed project. The Impact TRA-3 analysis (beginning on page 3.13-80 of the Draft EIR) addressed the potential to impact pedestrian and bicycle facilities and conditions and found that implementation of the proposed project would enhance both existing and planned pedestrian and bicycle facilities through and adjacent to the project site. While the project will introduce new vehicular crossing locations for pedestrian associated with the Pacific Avenue Reconnection, and additional driveway locations on Harbor Drive, these crossing locations would be designed to applicable standards and best practices, and would include elements such as high visibility crosswalk markings at all crossing locations, and raised crosswalks. Based on the discussion in Section 3.13 of the Draft EIR, the proposed project: (1) would not disrupt existing pedestrian or bicycle facilities; (2) would provide for pedestrian, bicycle, and roadway facilities that are designed with applicable design standards; and (3) would not substantially increase hazards due to design features or incompatible uses. The proposed project would improve bicycle and pedestrian connections throughout the site, especially by eliminating the pathway through the Pier Parking Structure (Table 2-2, page 2-46 of the Draft EIR). As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact pedestrian and bicycle modes.

The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR; therefore, the comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC081-3

* The noise coming from this new and unnecessary vehicular traffic will be a new and unreasonable burden for residents to bear.

Response to Comment PC081-3

Potential noise impacts associated with the project's construction-related traffic and operations-related traffic are addressed in Section 3.10, Noise of the Draft EIR. As indicated in the discussion of Impact NOI-3, which begins on page 3.10-31 of the Draft EIR, noise impacts associated with construction-related traffic were determined to be less than significant. Operational-related traffic noise impacts were also found to be less than significant, with the exception of a projected increase in existing ambient noise levels along Torrance Circle/Boulevard between the project site and Catalina Avenue that would occur in conjunction with the proposed reconnection of Pacific Avenue. That impact is acknowledged on page 3.10-33 of the Draft EIR as being a significant and unavoidable impact of the proposed project.

Comment PC081-4

* Traffic from Harbor Drive to Pacific Coast Highway and beyond will be unmanageable. Residents and visitors will be under stress trying to access the area.

Response to Comment PC081-4

Regarding general concerns regarding traffic associated with the proposed project, refer to Draft EIR Section 3.13, Traffic and Transportation, and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC081-5

* The hundreds of residents who live on the ocean side of Catalina now enjoy fresh air coming from the prevailing winds from the ocean. With the installation of a new public street these residents will now be subject to toxic fumes that is a serious health threat. We chose the location of our home very carefully to avoid these types of auto emissions.

Response to Comment PC081-5

As detailed in Draft EIR Section 3.2, Air Quality, air pollutant emissions associated with the operation of the proposed project, including traffic, were analyzed for the proposed project. While there would be some significant short-term air quality construction impacts, the analysis found that operation of the proposed project would not exceed the regional thresholds established for the operational emissions of criteria air pollutants within the air district at either the project or cumulative level. In addition, the analysis determined that during operation the proposed project would not expose sensitive receptors to significant localized concentrations of criteria pollutants, nor would the proposed project expose sensitive receptors to objectionable odors or to localized significant pollutant concentrations with respect to traffic emissions and toxic air contaminants.

Comment PC081-6

* The CenterCal drawings that have been made available to the public, supposedly to view, remain vague and impossible to analyze.

CenterCal never produced the three dimensional drawings they promised.

The city has not required the usual silhouette, or skeleton, at the site, in order to display just how tall, just how wide, or just how massive this development will be.

Response to Comment PC081-6

The conceptual plans for the project site are shown in Figure 2-8 on page 2-49 in Chapter 2, Project Description of the Draft EIR. In addition, refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR for details associated with the proposed project and an analysis of views. The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the 3D computer model.

Comment PC081-7

* Recreation will be very negatively impacted in many ways.

The Seaside Lagoon will be diminished greatly, turning public parkland into commercial buildings for private profits.

Those waterfront visitors, who come to exercise, enjoy views, wildlife, and open sky will be confronted with unwelcome and inappropriate auto traffic, noise, emissions, and towering buildings.

Boaters and Boarders will find parking impossible for their boats and boards in a parking structure. Who wants to go boating and boarding in the middle of a mall like The Grove?

Recreational enjoyment of the waterfront will be seriously reduced by this project.

Response to Comment PC081-7

For information on the proposed project in relation to the Seaside Lagoon, refer to Master Response #4: Modifications to the Seaside Lagoon. Section 3.12, Recreation of the Draft EIR analyzed the impacts of the proposed project associated with recreation. Section 3.12.4.2 provides the City's significance criteria associated with recreation, which includes (1) Increase the use of existing neighborhood and regional parks or other recreational facilities *such that a substantial physical deterioration of the facility would occur or be accelerated*, and (2) Include recreational facilities or required the construction or expansion of recreational facilities that might have *an adverse physical effect on the environmental* not already addressed as part of the proposed project.

While access to the waterfront and existing recreational facilities within the project site would be temporarily restricted during construction, access to existing recreational facilities in the immediate vicinity but outside of the project site would still be available. Marine recreation opportunities would not be affected during construction because King Harbor would remain open for use by recreational watercraft. Upon completion of construction, operation of the proposed project would not result in physical impacts to other recreational facilities or otherwise trigger the recreational significance criteria.

CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents, such as the visitors to Seaside Lagoon. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392.) However, as described in Draft EIR Section 3.9, Land Use and Planning, the proposed uses in Seaside Lagoon would be consistent with the City's recreational P-PRO zoning (parks, recreation, and open space zone) (see Table 3.9-8 in Section 3.9). The project site proposed recreational concession/accessory facilities would support the recreational use of the site as described on page 3.9-63 of the Draft EIR. While it is the commenter's opinion that buildings in the P-PRO zone are not appropriate recreational facilities, they were expressly contemplated in the City's certified zoning, which allows for a floor area ratio (FAR) of 0.25. Furthermore, the proposed project provides a number of benefits to the lagoon's operations, including but not limited to: (1) the proposed project would allow the lagoon to be open year round (rather than just over three months a year under existing conditions), (2) the proposed project would eliminate the physical fencing and barriers that separate the lagoon from the rest of the Harbor, (3) the lagoon would no longer require a fee to access the facility (as occurs under existing conditions), (4) individuals will be able to access the lagoon to launch paddle board and kayaks (which is not available under existing conditions), (5) the project will provide improved pedestrian and bicycle access

to the lagoon, and (6) improved concession and accessory uses (such as recreational sales/ rentals) would be provided. Regarding aesthetics, biology, traffic (including parking), noise, and air quality, see Table ES-5 in the Executive Summary of the Draft EIR, which provides a summary of impacts associated within each of these issue areas, and for detailed analysis, please see Draft EIR Section 3.1, Section 3.3, Section 3.13, Section 3.10, and Section 3.2, respectively.

Comment PC081-8

* Land use. Residents want to retain the Waterfront for recreational boating, water sports, fishing, boarding, and passive relaxation. They have made it clear many times they do not want to live in or visit the Waterfront in order to shop, drive their cars, or go to the movies.

Movie theaters do not belong in this area. Density is a serious problem in this plan.

Through traffic is not appropriate in this waterfront area.

Response to Comment PC081-8

Please see Response to Comment PC081-1 for discussion of the zoning history of the project site. As detailed in Chapter 2, Project Description and throughout the Draft EIR, the proposed project would include a mix of coastal-related retail and service uses, as well as public recreation enhancements such as a new small craft boat launch ramp, improvements to Seaside Lagoon, new parking facilities, expanded boardwalk along the water's edge, enhanced public open space, and pedestrian and bicycle pathways. Site connectivity and public access to and along the water would be improved by the establishment of a new pedestrian bridge across the Redondo Beach Marina/Basin 3 entrance and the reconnection of Pacific Avenue. As also discussed in Chapter 2, one of the project objectives is to reduce seasonality, by including facilities such as the movie theater. As discussed in the City Council's April 8, 2008 Administrative Report for the project site's zoning, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors."

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for discussion of the appropriateness of a movie theater at the project site.

As described throughout the Draft EIR (in particular, page 2-71 of Chapter 2, Project Description and Section 3.13, Traffic and Transportation), the Pacific Avenue Reconnection would enhance circulation at the project site. In fact, until the 1970s, when the original Pacific Avenue and El Paseo (streets along the waterfront) were removed, the past conditions consisted of connection of the public to the waterfront via Pacific Avenue, El Paseo, Harbor Drive and various other streets (see Figure 2-2, page 2-7 of the Draft EIR, which shows a map of the City from 1927 including the former configuration of Pacific Avenue and other waterfront roadway connections). The Pacific Avenue Reconnection would be a reconnection of the roadway access that once served to provide public access and connectivity along the coastline. This roadway would also greatly improve emergency access and protection service throughout the project site (refer to Section 3.11, Public Services of the Draft EIR for additional information).

Comment PC081-9

These Environmental Impact workshops and the Draft Impact Report are clearly drafted to be just another fraud to pretend that the public is being included in this theft of their public land to benefit private gain.

This project needs to be cancelled, this EIR needs to be scrapped, and the City of Redondo Beach needs to look at forming a citizens committee to find the right land conservancies to help create a new and brilliant plan to fund and revitalize our waterfront. The City must include any citizen who wants to participate to be included in the planning.

The Public will not tolerate this fraud and theft of public parkland.

Response to Comment PC081-9

Please see Response to Comments PC081-1 through PC081-8. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC082 BARBARA EPSTEIN

Comment PC082-1

Last month I objected to the CenterCal project for many reasons:

* We came to live in Redondo Beach for the healthful exercise we enjoy on our daily walks around the pier and the waterfront, with fresh air, open spaces, views of sea, wildlife, and sky.

We do not want wall-to-wall buildings at the waterfront. The density of this project will be claustrophobic.

* We participated in several planning workshops with the unfortunate result of all of our time, energy and hard work being ignored, leading us to realize that the workshops were nothing but a sham, and we had been victims of fraud and deception by the City Council majority and CenterCal, a shopping center developer. Clearly, the City Majority represents only special real estate interests in entering into this contract, not the residents who live at the waterfront.

* The City is giving valuable public property to a private company over the objections of many Redondo Beach citizens. This is immoral and possibly illegal.

Today I will further object to this project: This Draft EIR is fatally flawed and should be discarded.

* Constructing a new public street for vehicular traffic will dictate that cars, trucks, and motorcycles will dominate the space between Torrance Boulevard and Harbor Drive, cutting off public access and reducing foot and bike traffic from Catalina Avenue. The public will lose the ability to walk freely from Czuleger Park, or from the hundreds of nearby residences, to the waterfront without crossing traffic. This street presents a safety hazard and objectionable barrier for the walking public.

* The noise coming from this new and unnecessary vehicular traffic will be a new and unreasonable burden for residents to bear.

* Traffic from Harbor Drive to Pacific Coast Highway and beyond will be unmanageable. Residents and visitors will be under stress trying to access the area.

* The hundreds of residents who live on the ocean side of Catalina now enjoy fresh air coming from the prevailing winds from the ocean. With the installation of a new public street these residents will now be subject to toxic fumes that is a serious health threat. We chose the location of our home very carefully to avoid these types of auto emissions.

* The CenterCal drawings that have been made available to the public, supposedly to view, remain vague and impossible to analyze.

CenterCal never produced the three dimensional drawings they promised.

The city has not required the usual silhouette, or skeleton, at the site, in order to display just how tall, just how wide, or just how massive this development will be.

* Recreation will be very negatively impacted in many ways.

The Seaside Lagoon will be diminished greatly, turning public parkland into commercial buildings for private profits.

Those waterfront visitors, who come to exercise, enjoy views, wildlife, and open sky will be confronted with unwelcome and inappropriate auto traffic, noise, emissions, and towering buildings.

Boaters and Boarders will find parking impossible for their boats and boards in a parking structure. Who wants to go boating and boarding in the middle of a mall like The Grove?

Recreational enjoyment of the waterfront will be seriously reduced by this project.

* Land use. Residents want to retain the Waterfront for recreational boating, water sports, fishing, boarding, and passive relaxation. They have made it clear many times they do not want to live in or visit the Waterfront in order to shop, drive their cars, or go to the movies.

Movie theaters do not belong in this area. Density is a serious problem in this plan.

Through traffic is not appropriate in this waterfront area.

These Environmental Impact workshops and the Draft Impact Report are clearly drafted to be just another fraud to pretend that the public is being included in this theft of their public land to benefit private gain. This project needs to be cancelled, this EIR needs to be scrapped, and the City of Redondo Beach needs to look at forming a citizens committee to find the right land conservancies to help create a new and brilliant plan to fund and revitalize our waterfront. The City must include any citizen who wants to participate to be included in the planning.

The Public will not tolerate this fraud and theft of public parkland.

Response to Comment PC082-1

Refer to Response to Comments PC017-1, and PC081-1 through PC081-9 above.

COMMENT LETTER NO. PC083 JACK EPSTEIN

Comment PC083-1

Opening a new road between Torrance Boulevard and Harbor Drive at the waterfront will produce noise, pollution, congestion, irrational behavior, and possible violence. Why put in a street when we could have an electric people mover with hop on hop off stops along the way?

Response to Comment PC083-1

Refer to Response to Comment PC081-4 regarding traffic and Response to Comment PC081-5 regarding air quality associated with traffic. The commenter also suggests "an electric people mover with hop on hop off stops along the way." As noted, in Draft EIR Section 3.13.2.3.4, the project site is well served by transit service under existing conditions, and providing a short distance people mover through the project site, is not expected to affect transportation mode choice for the site's visitors (i.e. vehicle, bus, bike, or pedestrian access). Individuals who utilize the project are not expected to utilize vehicular transportation once they arrive at the project site. As also outlined in Draft EIR Section 2.4.1.5 in Chapter 2, Project Description and on page 3.13-81 in Section 3.13, the project includes a number of pedestrian and bicycle facility improvements.

Comment PC083-2

Supply trucks could use the roads early for all stores and restaurants.

Response to Comment PC083-2

The Draft EIR did assume that delivery and service vehicles would use the Pacific Avenue Reconnection. The traffic analysis (Section 3.13 of the Draft EIR) assumed traffic associated with delivery and service vehicles based on the proposed land use mix, and the noise section (Section 3.10 of the Draft EIR including page 3.10-26) addressed the noise associated with operations, service and loading areas and their location relative to noise sensitive receptors.

Comment PC083-3

Have any estimates been made for the additional traffic along Harbor Drive to Catalina, to Pacific Coast Highway and beyond as to the building of the future AES projects, which will impact the area even more?

This road seems to be outdated even before the addition of these two giant projects.

Response to Comment PC083-3

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As for the future AES project and cumulative impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis.

COMMENT LETTER NO. PC084 GRETCHEN LLOYD

Comment PC084-1

The acreage the Centercal project will be built on has been quoted by Centercal, newspapers and the City Council variously as 15, 18, 35 and now 36 acres; what is the actual acreage of the land the Centercal project will occupy not including the water.

Response to Comment PC084-1

As explained in Section 2.3.2.1 in Chapter 2, Project Description (beginning on page 2-16) of the Draft EIR, and shown on Figure 2-4 (page 2-18), the project site is an approximately 36-acre portion of the waterfront

(approximately 31.2 acres is land, including Seaside Lagoon, and 4.8 acres is water area made up of Basin 3 [3.5 acres] and the proposed boat ramp area at Mole C [1.3 acres]). As explained further in footnote #1 on page 2-16, during the process of selecting a developer for the proposed project, the site available for commercial development was identified as 15 acres. This figure was an estimate based on the size of the leaseholds and did not include areas that are within the project site boundary analyzed in the EIR. Specifically, the 15-acre estimate did not include the northwestern portion of the project site (Seaside Lagoon and the proposed boat launch ramp and boat launch ramp parking lot), the parking structures, the Pier Entry Plaza, and Torrance Circle, which are now included within the project site. In addition, although the Notice of Preparation identified the project site as being approximately 35.5 acres, for the purpose of the EIR the acreage has been rounded up to be approximately 36 acres. Land and water acreages are also rounded for purposes of the EIR.

Comment PC084-2

How can any legitimate company project the costs, profits, operating expenses and/or cost of square footage etc., when the developers have no idea of the total sq ft (or acreage) of the land they are trying to get a contract to develop. A contract must have specific and accurate numbers to be enforceable not to mention legal.

Response to Comment PC084-2

Please see Response to Comment PC084-1. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC085 GINA DIPIETO

Comment PC085-1

As an avid bird enthusiast, I am urging you to take the wildlife of Redondo Beach into consideration while making choices regarding development of the Harbor. We impact wildlife with the choices we make. A choice to preserve wildlife habitat and protect Redondo's fragile ecosystem is in keeping with the current standards set forth by government agencies, on both a State and Federal level. Please choose to do the right thing for our beloved winged and seaborne companions.

Redondo Beach is home to several protected species, including the Great Blue Heron, the migratory Humpback Whale and the Brown Pelican.

The Great Blue Heron is both Federally Protected, and it is also designated by the California Department of Fish and Wildlife as a "Special Animal." According to the CDFW website:

The Humpback Whale also spends time in Redondo Beach, migrating through our waters yearly. As you can see, the Humpback Whale has been known to get very close to shore. This year, a mother and her calf spent several days amusing whale watchers, kayakers, paddle boarders and surfers near the Redondo Pier. I was on a whale watching boat, and a woman quipped, "We're not watching them as much as they are watching us."

Currently the status of Humpback Whales continues to be an unresolved issue, although there has been a proposal to move them from "Endangered" to "Threatened." They are, nonetheless, a Federally Protected Species either way.

One of my primary concerns is the welfare of the California Brown Pelican. This beautiful winged creature is considered a Fully Protected Species by the California Department of Fish and Game.

Beyond their official status, Brown Pelicans in California make people happy on the Pier. They interact with fishermen, star in tourist videos, and they put on an excellent show flying in perfect "V" form, high in the heavens.

The Great Blue Heron, the Humpback Whale and the California Brown Pelican are all protected by state and federal regulations. These creatures deserve your attention, respect and protection. They are beautiful and they bring profound joy to the residents of Redondo Beach!

[For the photos included in the comment letter, please refer to the preceding PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC085-1

Section 3.3, Biological Resources of the Draft EIR details the existing wildlife and vegetation (on land as well as in the water). Specifically, in Section 3.3.2.3 (beginning on page 3.3-22), special-status species that occur at the project site (state and federal) are discussed and listed in Table 3.3-2 (page 3.3-23). Impacts on special-status species associated with the implementation of the proposed project are detailed in the analysis in Section 3.3.4.3.2 (beginning on page 3.3-37). As it specifically relates to the Great Blue Herons, they are special-status species only when they are nesting. There were no heron colonies in the terrestrial (land) area of the project site that would be affected. While the Great Blue Heron is not called out specifically as nesting at the project site, these birds fall under the discussion of nesting migratory birds (refer to Section 3.3.4.3.2). Should a heron or any nesting bird be found at the project site during construction, as detailed throughout the Draft EIR, Section 10-5.1900 of the Coastal Land Use Plan Implementing Ordinance (within the Redondo Beach Municipal Code), prohibits trimming or disturbance of trees that have been used for breeding and nesting by bird species listed pursuant to the Federal or California Endangered Species Acts, California bird species of special concern, and wading birds (herons or egrets) within the previous five years, as determined by a qualified biologist, unless a health and safety danger exists, and prohibiting tree trimming and removal during the breeding and nesting season (January through September) unless a tree is determined to be a danger to public health and safety.

Humpback whales are addressed in Section 3.3 of the Draft EIR under marine mammals. The California Brown Pelican is specifically noted as occurring within the project site (Table 3.3-2).

The Draft EIR (as detailed in Section 3.3, Biological Resources) found that a significant impact to special-status species and sensitive habitats could occur during construction (due to the potential for mortality or injury from contact with construction equipment, or behavioral effects and effects on hearing from the noise of pile driving activities if marine mammals are nearby), but with implementation of mitigation measures (MM BIO-1 and MM BIO-2), the impacts would be reduced to less than significant.

COMMENT LETTER NO. PC086 BARBARA EPSTEIN

Comment PC086-1

Last month I objected to the CenterCal project for many reasons:

*We came to live in Redondo Beach for the healthful exercise we enjoy on our daily walks around the pier and the waterfront, with fresh air, open spaces, views of sea, wildlife, and sky.

We do not want wall-to-wall buildings at the waterfront. The density of this project will be claustrophobic.

*We participated in several planning workshops with the unfortunate result of all

of our time, energy and hard work being ignored, leading us to realize that the workshops were nothing but a sham, and we had been victims of fraud and deception by the City Council majority and CenterCal, a shopping center developer. Clearly, the City Majority represents only special real estate interests in entering into this contract, not the residents who live at the waterfront.

*The City is giving valuable public property to a private company over the objections of many Redondo Beach citizens. This is immoral and possibly illegal.

Today I will further object to this project: This Draft EIR is fatally flawed and should be discarded.

* Constructing a new public street for vehicular traffic will dictate that cars, trucks, and motorcycles will dominate the space between Torrance Boulevard and Harbor Drive, cutting off public access and reducing foot and bike traffic from Catalina Avenue. The public will lose the ability to walk freely from Czuleger Park, or from the hundreds of nearby residences, to the waterfront without crossing traffic. This street presents a safety hazard and objectionable barrier for the walking public.

*The noise coming from this new and unnecessary vehicular traffic will be a new and unreasonable burden for residents to bear.

*Traffic from Harbor Drive to Pacific Coast Highway and beyond will be unmanageable. Residents and visitors will be under stress trying to access the area.

*The hundreds of residents who live on the ocean side of Catalina now enjoy fresh air coming from the prevailing winds from the ocean. With the installation of a new public street these residents will now be subject to toxic fumes that is a serious health threat. We chose the location of our home very carefully to avoid these types of auto emissions.

*The CenterCal drawings that have been made available to the public, supposedly to view, remain vague and impossible to analyze.

CenterCal never produced the three dimensional drawings they promised.

The city has not required the usual silhouette, or skeleton, at the site, in order to display just how tall, just how wide, or just how massive this development will be.

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The Seaside Lagoon will be diminished greatly, turning public parkland into commercial buildings for private profits.

Those waterfront visitors, who come to exercise, enjoy views, wildlife, and open sky will be confronted with unwelcome and inappropriate auto traffic, noise, emissions, and towering buildings.

Boaters and Boarders will find parking impossible for their boats and boards in a parking structure.

Who wants to go boating and boarding in the middle of a mall like The Grove?

Recreational enjoyment of the waterfront will be seriously reduced by this project.

* Land use. Residents want to retain the Waterfront for recreational boating, water sports, fishing, boarding, and passive relaxation. They have made it clear many times they do not want to live in or visit the Waterfront in order to shop, drive their cars, or go to the movies.

Movie theaters do not belong in this area. Density is a serious problem in this plan.

Through traffic is not appropriate in this waterfront area.

These Environmental Impact workshops and the Draft Impact Report are clearly drafted to be just another fraud to pretend that the public is being included in this theft of their public land to benefit private gain.

This project needs to be cancelled, this EIR needs to be scrapped, and the City of

Redondo Beach needs to look at forming a citizens committee to find the right land conservancies to help create a new and brilliant plan to fund and revitalize our waterfront. The City must include any citizen who wants to participate to be included in the planning.

The Public will not tolerate this fraud and theft of public parkland.

Response to Comment PC086-1

Refer to Response to Comments PC017-1, and PC081-1 through PC081-9 above. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC087 JACK EPSTEIN

Comment PC087-1

Opening a new road between Torrance Boulevard and Harbor Drive at the waterfront will produce noise, pollution, congestion, irrational behavior, and possible violence. Why put in a street when we could have an electric people mover with hop on hop off stops along the way?

Supply trucks could use the roads early for all stores and restaurants.

Have any estimates been made for the additional traffic along Harbor Drive to Catalina, to Pacific Coast Highway and beyond as to the building of the future AES projects, which will impact the area even more?

This road seems to be outdated even before the addition of these two giant projects

Response to Comment PC087-1

Refer to Response to Comments PC083-1 through PC083-3 above.

COMMENT LETTER NO. PC088 BARBARA EPSTEIN

Comment PC088-1

Last month I objected to CenterCal's attempt to take public parkland for private gain, and for their attempt to fool the public into thinking our input would be used in the waterfront project. I objected to wall -to -wall buildings covering the waterfront, distracting from the visitors' enjoyment of the fresh air, open sky, and views of the ocean and wildlife.

Today I further object to this Draft EIR. It is fatally flawed and should be discarded. There are so many errors and deceptions in this document that there are too many to list here, so I have submitted them in writing.

This project needs to be cancelled, this flawed EIR needs to be scrapped, and the City of Redondo Beach needs to go back to the residents to help find the right land conservancies to help us fund, plan and create something of beauty and outdoor fun that everyone can enjoy, including small business owners at the waterfront.

The new plan will include working with AES to make an over all general plan for both parts of the waterfront, drawing it together in a brilliant outcome that will be good for all parties.

We can do better than this developer and this EIR

Response to Comment PC088-1

Refer to Response to Comments PC017-1, and PC081-1 through PC081-9 above for commenter's previous concerns/comments.

Regarding the future AES project, refer to Master Response #1: AES Power Plant Site.

COMMENT LETTER NO. PC089 STEVE

Comment PC089-1

If you have a bridge what alternate route is available if it is not operational.

Response to Comment PC089-1

As shown in Chapter 2, Project Description of the Draft, on Figures 2-19 (page 2-73) and Figure 2-20 (page 2-74), bicycle and pedestrian circulation throughout the project site can occur with or without the pedestrian/bicycle bridge.

Comment PC089-2

How do we protect wildlife that have legal protective status? Seals, abalone, migrating birds, and fish.

Response to Comment PC089-2

Refer to Response to Comment PC085-1 above. The Draft EIR (as detailed in Section 3.3, Biological Resources) detailed the impacts to wildlife and vegetation and provides implementation of mitigation measures (MM BIO-1 and MM BIO-2) that would reduce impacts to less than significant.

COMMENT LETTER NO. PC090 UDEWITZ

Comment PC090-1

-Very worried about height of final structures where Captain Kids Zamba's + On The Rocks are now

-We formerly agreed to 2 story structures but see from pictures that movie house side of new corridor is higher

Response to Comment PC090-1

Please refer to the Master Response #9: Views and Scale of Development and Table 3.9-1 in Section 3.9, Land Use and Planning of the Draft EIR, which presents the height requirements and maximum number of stories for buildings in the project site.

Regarding building elevations, please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR for an analysis of views, which includes views of the project site, including Key Observation View 5, which is the current location of Captain Kid's restaurant (Figure 3.1-9, page 3.1-47 of the Draft EIR).

The conceptual plans for the project site (refer to Figure 2-8 on page 2-49 in Chapter 2, Project Description of the Draft EIR) place the specialty cinema in the northern portion of the project site adjacent to the proposed parking structure and on the eastern side of the new main street, which does not interfere with the pedestrian experience of the waterfront. As discussed in Section 3.9, Land Use and Planning, the number of stories and building height would comply with the requirements of the Coastal Zoning and other development regulations, which allow buildings to be a maximum of height of 45 feet and maximum of three-stories at this location.

Comment PC090-2

-Be honest - Don't try to misrepresent reality of situation to avoid conflicts. Make correct changes now – before construction begins

Response to Comment PC090-2

The commenter states an opinion, which will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC090-3

-Soundproofing – provide soundproofing windows for condos in Seaside II as part of your expenditure

Consider realistically – sound, pollution, noise disruption + hours of deliveries trucks

Response to Comment PC090-3

Please see Response to Comment PC039-7 for discussion of noise impacts and mitigation.

Section 3.10, Noise of the Draft EIR addresses the potential noise impacts of the proposed project (i.e., "sound pollution" and "noise disruption"). This analysis expressly included consideration of delivery vehicles, which were discussed in Section 3.10, including page 3.10-26. As also discussed on page 2-47 in Chapter 2, Project Description of the Draft EIR, on the southern portion of the site (near residences), the existing service/loading area along Torrance circle would be replaced with an enclosed and screened loading and service bay (i.e.,

loading dock-service bay area with full-length side walls and a sliding or roll-down door), which would provide an improvement associated with existing service noise in comparison to existing conditions. As noted on Draft EIR page 3.10-9, a wall (barrier) typically provides a noise reduction of at least 5 dBA. An enclosed facility, such as the proposed service area would reduce noise by an even greater amount, typically on the order of a 10 to 20+ dBA reduction when closed, depending on design building materials.

COMMENT LETTER NO. PC091 BRYCE & LISA

Comment PC091-1

Polly's is our absolute favorite restaurant! From the food to the friendly accommodating staff. This pier is an institutional landmark and we have been enjoying this location for over 30 years. Our nieces and nephew have grown up going here as well. This is the only place in the South Bay that we can enjoy a delicious meal, hear the water while enjoying the view, watch the people fishing and see our local birds. We need to keep the integrity of our pier, a place we love and enjoy!!! The pier is Redondo Beach a place where us locals and tourist come to.

Response to Comment PC091-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC092 ERIC RATLEY

Comment PC092-1

I have just heard the news and am appalled. Polly's reverberates what "old Redondo Beach was like before all the developments moved in.

Sitting on the pier, watching people fish while enjoyed a breakfast is a pleasure that I have had for a great many years and I want it to remain for others to find and enjoy.

Don't take this piece of history away in the name of progress.

Protect our history!!!

Response to Comment PC092-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC093 MR & MRS MARTINEZ

Comment PC093-1

As long time residents of R.B., our favorite breakfast/lunch place is Pollys on The Pier. Visitors from around the country have joined us here. Sitting outside, surrounded by water, listening to the waves against the rocks – is very different than any other place in town. Even those close by (in the adjacent

parking lot) don't offer the same experience. We love our RB local spoon. Don't take the place away – let it stay as is. That was my wife. I completely agree with her. I get it. Tear things down to make them better…no. In this case, this small humble restaurant & pier are just perfect. It would be a great shame and loss to change what's already perfect. Please leave it be.

Just called my sister in NY. Her response to taking down the pier & changing Polly's:"Noooo!!!"

Response to Comment PC093-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC094 JASPER BRUINSMA

Comment PC094-1

The pier is it's own institution for generations children have learned to fish here.

Families have enjoyed Pollys, the fishing boat business with ½ & full day trips.

Don't make this about squeezing an extra penny out of budget!

Keep Redondo Redondo means keep the good, healthy, true traditions alive.

Keep the pier!

Response to Comment PC094-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC095 DARREN & PAMELA MATSUDA

Comment PC095-1

This pier was created countless memories for my family. Growing up I remember learning how to fish on this pier, spending quality time with friends + family and just being able to come out and enjoy the view and water w/out the hustle + bustle of a lot of tourist. We enjoyed countless meals at Polly's and can't imagine not being able to watch the sparkling water as we eat those meals. Tearing down the pier would be a big mistake and the community would not be the same. This pier makes us "feel like home" as a local resident. Fishing on the pier and having Polly's is definetly a plus to the community. We can't imagine Redondo Beach with out it.

Response to Comment PC095-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC096 CAROLYNN EDIGER

Comment PC096-1

When I come to L.A. I come to the Sportfishing Pier everytime. I have breakfast at Polly's on the Pier. Do not take down one of the finest L.A. Landmarks.

Response to Comment PC096-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC097 SHARON ANDRADE

Comment PC097-1

The Sport Fishing Pier has been a staple in my life and all my friends lives. We have Europeans come visit and they tell others in Sweden & other European countries that this is the highlight of their visit. I have been coming to Polly's on the Pier for 40 years.

It would be horrible to have a landmark taken away.

Families have become friends over the year of having breakfast & lunch her at Polly's.

Many friends including myself have gone whale watching or fishing on this pier.

The Pier has an historical value.

Please save the Pier!

Response to Comment PC097-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The Draft EIR's cultural resource analysis (Section 3.4) determined that the Sportfishing Pier was a historic resource and disclosed that its demolition would result in a significant impact; please see Draft EIR pages 3.4-51 through 52. As also discussed on Draft EIR pages 3.4-65 through 66, preservation of the existing Sportfishing Pier is not considered feasible and historic resource impacts are considered significant and unavoidable. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC098 KIM LEE

Comment PC098-1

The Sport Fishing Pier is a part of the history of not just Redondo Beach, but the South Bay! Being a local teacher, I have spent many mornings on this pier eating at Polly's and watching current and former students learn to fish. Where in all of your plans would that be possible?

Growing up in Virginia and Alabama my family and I missed that small town feel, and when we discovered Polly's we found home. There is NO OTHER PLACE in the South Bay where you can dine under the sun, hearing the ocean, and knowing that you will have a home-cooked meal served by friends that know you.

Response to Comment PC098-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. As mentioned in the Draft EIR and Master Response, if the Sportfishing Pier is not replaced, pier fishing would continue to be available from a portion of the Horseshoe Pier and the adjacent Monstad Pier (immediately adjacent to the project site). Therefore, fishing opportunities would continue to be available under the proposed project. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC099 VINCENT GOLDBERG

Comment PC099-1

I've been a major regular at Polly's on the Pier for years and I'm worried about the new waterfront plan. Redondo is the last of the great beach cities and I'm afraid that a galleria on the water is not good for quality of life here. I'm in favor of a new pier for Pollys to remain on the Pier! Retain some local flavor and don't price out the locals! This isn't, and shouldn't, become, Marina Del Rey.

Response to Comment PC099-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC100 SARA ORD

Comment PC100-1

Polly's on the pier is a tradition! Coming out to Redondo beach to sit on the pier and have my favorite breakfast is one of the most relaxing and enjoyable things. To remove Polly's from the Pier would be a tragedy. The authenticity of Polly's is centered around it's location on the pier, there is simply no place like it. Please do not remove such a landmark that exists as a place for people to enjoy themselves.

Response to Comment PC100-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC101 MIKE PAHL

Comment PC101-1

Removing the Pier & Polly's at the Pier will harm the local people that visit the Pier and Polly's daily and

weekly. By removing this established restaurant is only a mistake. Again no one cares about the local community or economy. We have been eating breakfast & lunch be making for the last 20 years the city must think about the local employment before making this mistake.

The first time I attended a meeting at Redondo Beach Performing Art Center – was not informative.

Will the development turn out the same as the bike lane Harbor Drive.

Rebuild the Pier – Rebuild Polly's in the same location.

Response to Comment PC101-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. For additional information on the proposed bicycle facilities, please see Draft EIR Section 2.4.1.5 in Chapter 2, Project Description, and Section 3.13, Traffic and Transportation of the Draft EIR beginning on page 3.13-80. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC102 ANDREW PAHL

Comment PC102-1

The small Pier in South Redondo that is home to Polly's and the Bait Shop is a landmark item for Redondo. Removing this iconic feature that brings pleasure to locals and tourists alike would be a terrible mistake. I have lived in Redondo for almost 20 years and have been frequenting Polly's for almost as long. Please do not remove this vital piece of history in a city that is losing it's small-town beach community appeal by the year.

Response to Comment PC102-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC103 BARBARA STEWART

Comment PC103-1

We have been coming to Polly's on the Pier for years now – and bring every guest to California here for Breakfast. It would be a huge loss to the community to tear down this pier and to move Polly's to a food court.

Please do not destroy the environment and the ambiance of this place and keep Redondo as is.

Response to Comment PC103-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC104 ANONYMOUS

Comment PC104-1

We have been regulars to Polly's on the Pier' for 45 years. Our relative that visit us 'love' Polly's.

Please don't move them off the pier. Certain landmarks need to stay!

Polly's as well as other establishments make the Pier area unique. Charming is perhaps the more appropriate description.

Response to Comment PC104-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. Please also see Response to Comment PC097-1 for discussion of the historic status of the Sportfishing Pier. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC105 ALEXIS JENSEN

Comment PC105-1

Polly is an icon in the South Bay – no matter what Polly needs to stay. Believe in renovation and moving forward but Polly's is a family tradition. We have been coming to Polly's for years. My kid's favorite place, my friends and I breakfast gang out every weekend. It's great to have Polly's in the middle of these franchise. Polly is unique, family gathering, tradition, and icon. Let's leave part of history, leave Polly!

Response to Comment PC105-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC106 LEE & DEBBIE KORNEGAY

Comment PC106-1

We have been coming here for breakfast for over 20 years and have enjoyed the food and view from the pier. It would be very disappointing if they were forced to move off the pier. It is our favorite breakfast place in the South Bay area.

We greatly appreciate the sites and sounds from the ocean & from the pier. We enjoy walking at the end of pier viewing the sea life and fishermen.

Response to Comment PC106-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC107 KAREN & CHET MORRIS

Comment PC107-1

The short pier in Redondo Beach has become an icon. We have enjoyed dining outside at Polly's for the past 30+ years. Relocating Polly's would lead to their demise as most people come to enjoy the water on the Pier and its surroundings (i.e. waves, fishing, wildlife, view of Palos Verdes, sounds of the seals, etc). Nothing could replace the ambience Polly's on the Pier has to offer. There are very few places in Redondo Beach that have dining adjacent to the water and to lose Polly's would be another loss to the community both to the local residents and tourists. Please for the reasons stated above we strongly believe Polly's on the Pier and the short pier should remain as is.

Response to Comment PC107-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC108 ERIK BURGERS & FAMILY

Comment PC108-1

You cannot tear down Pollys on the Pier!!!! We have been coming here for years + it is our favorite spot in this City as well as a staple landmark for the community. The cozy family feel, the personal attention + service and the unpretientiuos setting make this place second to none. It would be tragic and a blemish on the City to see such a legacy die. Pollys must stay in its current form or at least build us our own Pier.

Response to Comment PC108-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. Please also see Response to Comment PC097-1 for discussion of the historic status of the Sportfishing Pier. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC109 CARLOS JIMEŃEZ

Comment PC109-1

Polly's on the Pier is not just a restaurant –It's a South Bay destination due to its location on a pier, over the water, with the fishermen + the birds + the fish. Pollys is about the atmosphere – the Pier. To move this restaurant off of the Pier would be a travesty. I used to travel here from Santa Monica before I finally moved to the South Bay. I am originally from Pennsylvania and whenever family and friends come to visit me here in California, Polly's is our first breakfast stop over other destinations like the Grove or King's Hawaiian. As a teacher, having a cup of coffee on a Sunday morning before another week of working with children + their parents + administrators, Polly's is therapeutic. Please consider the importance of Polly's on the Pier to community members like myself and to those family + friends of the community who look forward to its unique ambience when they visit + bring in revenue from out of state + from other parts of the Los Angeles area.

Response to Comment PC109-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC110 JESSIE & DON MATTICK

Comment PC110-1

My dad and I have been coming to Polly's every Sunday since I was in High School (11 years ago). It has been a tradition of ours and it would be so sad if we didn't have that anymore. You always see the same faces every morning and it's like a family. If you tear this pier down you would be taking away people's morning breakfast tradition & a staple of Redondo Beach.

Response to Comment PC110-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC111 JOANN TURK

Comment PC111-1

We support CenterCal and City – infrastructure needs help + $.

Please rebuild or replace Sportfishing Pier + Polly's – it is the soul of the waterfront- it represents open space!

Nature – fishing –happy kids + family.

Visitors appreciate a chance to see nature first hand.

Response to Comment PC111-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC112 ANONYMOUS

Comment PC112-1

I am not opposed to the revitalization, but I am concerned that with all the upscaling, that I'm not going to be able to afford to bring my family there. The renderings are beautiful, but makes me feel I'll be priced out of my own neighborhood. I've always felt Redondo was the more affordable South Bay town – one I could afford to go out in. But it looks like it'll turn Manhattan Beach with Manhattan beach prices. Can't afford that.

Response to Comment PC112-1

Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on upscaling. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC113 EVOY RETAMAL

Comment PC113-1

Very impressed with the very well thoughout project.

Congratulations to the City's great work on this !!

Response to Comment PC113-1

The commenter states an opinion/preference relevant to the project approval: your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC114 CRISTINA HEINRICKS

Comment PC114-1

I am a life long South Bay resident. Growing up here I have witnessed many changes to the area. What makes Redondo Beach special and different from the others is its- hometown charm. This specialness is embodied partly in the fishing pier. The small pier that attracts so many people from throughout. The whole area. Redondo loves everyone. This pier serves Redondo by extending a warmth and familiarity not found in other cities. To lose this pier would be a blow to the heart and soul of Redondo. A piece of our fond memories, and Future memories, would be lost forever!! Keep the pier – maintain the essence of the South Bay!! Please!

Response to Comment PC114-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC115 ERIKA SNOW ROBINSON

Comment PC115-1

Love it – can't wait!

Please keep the Polly Pier (+ Polly's!)

Please move the dang bike path to the EAST side of the road!

Please make the Seaside Lagoon + Beach/Park area a little bit bigger!

Thank You!

Response to Comment PC115-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. As shown on Figure 2-18 on page 2-72 of the Draft EIR (Chapter 2, Project Description), the bike path is on the eastern side of the Pacific Avenue Reconnection. For information on the proposed project in relation to the Seaside Lagoon, refer to Master Response #4: Modifications to the Seaside Lagoon.

COMMENT LETTER NO. PC116 ANONYMOUS

Comment PC116-1

Please stop paying for "pro-plan" people. It makes you look bad. I am for the project & that was very off-putting & obvious. You don't need to pay people to talk vs. the lunatics in this town.

Response to Comment PC116-1

The commenter states an opinion that is outside the purview of an EIR. However, your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC117 TERRY EDWARDS

Comment PC117-1

Has the traffic study considered future traffic flow mitigation at the intersection of Beryl/N. Francisca. Currently a lot of traffic is utilizing N. Francisca Ave as a "short-cut" from Beryl -> Catalina. This would likely increase in volume. Speed cushions in place are currently not a deterent to speed or volume.

Response to Comment PC117-1

Section 3.13, Traffic and Transportation of the Draft EIR looks at traffic and circulation associated with Beryl and Francisca (refer to Table 3.13-1, page 3.13-12, which identifies Beryl and Francisca Ave as Intersection 18 of the 41 intersections analyzed associated with the project's study area. The transportation analysis in Section 3.13 also includes an analysis of future cumulative conditions. The trip generation and distribution are described in Draft EIR Section 3.13.4.1.1. More detailed trip distribution information is also included in Draft EIR Appendix L1 (including its Appendix X-2 titled "Peak Hour Turning Movement Volumes & Intersection Lane Configurations"). Refer to Final EIR Chapter 3, Modifications to the Draft EIR, for modifications to the Appendix X-2 figures. As shown in Tables 3.13-16 and 3.13-30 in Section 3.13, while there would be a slight increase in the use of Intersection 18, there would not be a significant impact under existing or cumulative conditions.

COMMENT LETTER NO. PC118 MICHELLE ACCETTA

Comment PC118-1

I listened to the EIR … a fell there is minimal impact to the community & environment. As a realtor in Redondo Beach I support the project as I feel it will positively impact the home values in the area & make Redondo Beach a more desirable place to live.

This project will be an amazing place for residents and give residents an even greater sence of pride to live here!

As a younger resident I spend a lot of my leasure time in Manhattan Beach & Hermosa Beach. I look forward to having a place to go within my own community. A placer that is close & walkable.

Younger homeowners look for areas that are walkable. The pier currently is not a desirable place for younger residents. This is a community of young professionals with good paying jobs that our bringing their business to other citie … Manhattan & Hermosa! Keep business local! ☺

Response to Comment PC118-1

The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC119 MARY LEE COE

Comment PC119-1

The Center Cal project threatens protected wildlife.

Response to Comment PC119-1

Please refer to Draft EIR Section 3.3 for detailed analysis of Biological Resources and Response to Comment PC085-1. The comment states an opinion but does not introduce new environmental information. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC119-2

The project is not economically viable. Brick and motar retail is declining. The middle class who would shop the retail and movie theater is also declining. Redondo Beach City taxpayers will be liable for huge financial loses. It's the last redevelopment white elephant all over again.

The project is too much development. So much retail and the movie theater is inconsistent with the ambiance of the pacific ocean waterfront.

Response to Comment PC119-2

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, regarding the project viability and the movie theater. The comment states an opinion but does not introduce new environmental information. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC119-3

The destruction of the Sport Fishing Pier and not rebuilding it or putting it in the wrong place is contrary to what the harbor should be about, recreational fishing and education.

Response to Comment PC119-3

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The commenter suggests the harbor should be about recreational fishing and education. Please see Draft EIR Table 3.9-1 in Section 3.9, Land Use and Planning, which identifies the allowable uses in the Harbor Pier area, which includes categories beyond recreational fishing and education.

Comment PC119-4

Lastly the traffic will be impossible.

Response to Comment PC119-4

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC119-5

The answer is eliminate the movie theater and about half the retail. Use the space for viewing the ocean, educational aids about the ocean and picnic areas and outdoor eating places overlooking the ocean.

Response to Comment PC119-5

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC120 JOAN RILEY

Comment PC120-1

Grossly inadequate noise (+vibration) impact analysis – Both Demolition/construction and post construction

*proximity to approx 1000 households so close to completely negate reasonable ambient noise

*with background of water (+ocean transmit sound) & Foreground of rising canyon up to Prospect Ave. Effects of noise will impact much greater #'s of homes, parks, etc

*You cannot measure noise/vibration impact w/out measuring line of sight from source to impacted pt. – Doors + windows that will be open can negate measures to mitigate

Response to Comment PC120-1

Although the first part of the comment is unclear in its meaning, it seems to suggest that demolition/construction and post-construction activities occurring in proximity to approximately 1000 households would be so close as to completely negate reasonable ambient noise. The noise impacts analysis presented in Section 3.10, Noise of the Draft EIR beginning on page 3.10-25 addresses the project's construction-related and operations related noise occurring in proximity to noise-sensitive uses nearby, including residential uses, and takes into account changes in the existing ambient noise levels that were determined based on recent noise measurements. It should be noted that background noise associated with wave actions (i.e., waves breaking) at nearby shore areas were accounted for in the ambient noise measurements to the extent they were audible/measurable at each noise monitoring location.

It is unclear as to the meaning of "foreground of rising canyon up to Prospect Ave. Effects of noise will impact much greater #'s of homes, parks, etc." Prospect Avenue is located approximately one mile east of the project site and the area between those two points is highly urbanized, with no defined canyon. While there is a slope rise and somewhat of a canyon in Czuleger Park just east of the project site, the park is largely covered with vegetation, which would tend to refract and "absorb" sound rather than somehow increase it, as perhaps suggested by the comment.

It is unclear as to the meaning of "You cannot measure noise/vibration impact w/out measuring line of sight from source to impacted pt." The delineation of noise/vibration impacts at specific distances presented in Section 3.10, Noise of the Draft EIR are based on straight line distances between noise sources and noise receptors (Table 3.10-8 and 3.10-10). The term "line of sight" used in noise analyses typically refers to the presence or absence of obstructions, such as landforms, buildings and structures, which would break the "line of sight" between a specific noise source and a noise receptor. Such a break in the line of sight due to an intervening obstruction(s) results in a reduction in the noise level at the receptor, as was described on Draft EIR page 3.10-9.

Regarding the comment "Doors + windows that will be open can negate measures to mitigate," the noise analysis presented in the Draft EIR disclosed impacts based upon outdoor noise levels, and did not take credit for indoor noise levels being affected by windows and doors being open or closed.

Comment PC120-2

Neighborhood quality of life, approx. 1000 households x approx. $500k value a piece means that you are negatively affecting – impacting 500 million dollars worth of real estate$ Real loss!!

Response to Comment PC120-2

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC120-3

No one wants the odor, noise, air pollution, traffic and light, pollution along w/ crowds in their front yard. Yet to impose this excessive degradation of existing quality of life factors runs counter to successful planning

Response to Comment PC120-3

Impacts associated with the construction and operation of the proposed project are summarized in Section ES.7, Summary of Environmental Impacts of the Proposed Project and Alternatives (beginning on page ES-30) in the Executive Summary associated with the Draft EIR. Although a majority of the impacts were found to be less than significant or less than significant with implementation of mitigation, the Draft EIR analysis did determine that there would be a total of six significant and unavoidable impacts. Four significant and unavoidable impacts would occur during construction (short-term throughout the 2.25 to 2.5 years of construction), and included one associated with air quality (e.g., air quality violation during construction for NOx and CO) and two associated with noise (e.g., construction could expose sensitive receptors to excessive groundborne vibration or noise levels, including a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and in excess of the City's standards). Two significant and

unavoidable impacts, including a substantial permanent increase in ambient noise levels in the project vicinity at Torrance Circle/Boulevard between Catalina Avenue and the project site above levels existing without the project and in excess of the City's standards, and the other impact regarding a tsunami hazard), which is not a new impact but would continue at the project site (although with implementation of mitigation measures the impacts would be reduced) due to natural uncertainties of such an event occurring in the future. Table ES-5 and Table ES-6 in the Executive Summary (beginning on page ES-35) identify significant and unavoidable impacts associated with the proposed project. For detailed analysis of the impacts associated with the proposed project that the commenter notes, refer to the Draft EIR, air pollution and odor (Section 3.2, Air Quality), noise (Section 3.10, Noise), traffic (Section 3.13, Traffic and Transportation), and light (Section 3.1, Aesthetics and Visual Resources).

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC120-4

How are you protecting citizens from extreme + adverse + permanent impacts?

You are not!! Health is Impacted 24 hrs a day

People have the right to choose the nature of their envirament, acoustical especially, - not to be imposed

Response to Comment PC120-4

Proposed mitigation measures for each resource area are described in Table ES-5 in the Executive Summary of the Draft EIR, including measures associated with air quality, noise, and traffic. If the project is approved these mitigation measures will be incorporated into a Mitigation Monitoring and Reporting Program and imposed on the project during construction and operation, as applicable.

Comment PC120-5

Note: there exists today an under reporting of noise, Police have hard enough time responding to crime – no one wants to bother them! Cannot base reporting of noise as actual volume of noise

Response to Comment PC120-5

The characterization of existing noise levels at and around the project site, as presented in Section 3.10.2.2 of Section 3.10, Noise of the Draft EIR, is based on actual noise measurements and modeled noise levels.

Comment PC120-6

The project will adversely impact Czueleger Park – It clearly is the main pedestrian entrance to the waterfront. 500+ homes use that as their only park!!

Response to Comment PC120-6

Please see Draft EIR Sections 3.1 to 3.14, which disclosed the impacts of the proposed project on the surrounding environment, including Czuleger Park. In particular, views from Czuleger Park are addressed in Section 3.1.4.5 of Section 3.1, Aesthetics and Visual Resources and Master Response #9: Views and Scale of

Development. Further, as described on page 2-61 of Chapter 2, Project Description of the Draft EIR, the minor modifications to the Plaza Parking Structure, the upper level of which is considered the lower portion Czuleger Park, would not alter the park; however, the area may temporarily be closed to public during construction for safety reasons. In addition, access to and from Czuleger Park and the project site would be maintained. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC121 GARY & ROSE MLYNEK

Comment PC121-1

Build Baby Build

Sorry I had to leave early

Response to Comment PC121-1

The commenter states an opinion on the project. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC122 REGGIE THOMAS

Comment PC122-1

I support the waterfront!

Response to Comment PC122-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC123 STEPHEN COMLEY

Comment PC123-1

Supporting I want to speak

Response to Comment PC123-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC124 JENNIFER GOLDSTEIN

Comment PC124-1

I support the project

Response to Comment PC124-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC125 JOHN GRAN

Comment PC125-1

I support the process.

Response to Comment PC125-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC126 TERA GUTHRIE

Comment PC126-1

I support the waterfront

Response to Comment PC126-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC127 DON SZERLIP

Comment PC127-1

I support the waterfront project

Response to Comment PC127-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC128 DARRYL VANDER EINDE & LINDA BUFFINGTON

Comment PC128-1

We support the project – PLEASE ANNOUNCE

But needed to leave early

Response to Comment PC128-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC129 ROLAND CESARINI

Comment PC129-1

I have to leave eary now but I have been going to waterfront meetings since we started & I support this

Please announce this

Response to Comment PC129-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC130 MICKEY COOPER

Comment PC130-1

I support the project but need to leave early

Please announce this!

Response to Comment PC130-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC131 MARK LIBIANO

Comment PC131-1

Support

Response to Comment PC131-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC132 DAVID WALDNER

Comment PC132-1

One of the proposals involves the installation of a public boat ramp near the King Harbor Yacht Club next to the breakwater. This is not a good idea for the following reasons:

1.) That area is subject to huge wave action during the winter where 25 foot+ waves are literally breaking over the breakwall it's extremely dangerous for many months of the year. This is why King Harbor Yacht Club removes its docks from the water during the winter months.

2.) Vehicle and trailer parking would be a big problem as parking is already at capacity for Yacht Club members, guests, and the youth sailing program participants.

3.) The area would need to be constantly policed for litter, docking violations, unsafe activity, etc.

Response to Comment PC132-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A. (See Draft EIR, Chapter 4, Analysis of Alternatives - Alternative 8.) The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a through 4-5c, the Alternative 8 – Mole A options include a 60-foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. Additionally, parking for the boat ramp would be provided. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A.

The City currently enforces litter and water quality BMPs and regulations, including regulations for boat operations as described in Draft EIR Section 3.8, Hydrology and Water Quality. Waste and recycling receptacles would be provided at the boat ramp site, as well as throughout the project site. Section 3.14, Utilities also includes a detailed discussion of the existing solid waste (i.e., litter) regulations. Furthermore, Section 3.11, Public Services of the Draft EIR also determined that the Harbor Patrol's current staffing levels are adequate to meet the anticipated needs of the proposed project, including the boat launch ramp. The commenter has provided general information that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC133 JANE GARRISON

Comment PC133-1

My husband and I own our home at 627 south Catalina ave in Redondo.

We have taken the time to review the proposed new waterfront and are extremely against the plan as submitted. The last thing this area needs is more shopping malls and movie theatres. We need a plan that embraces the ocean and the lifestyle of the beach....not indoor shopping.

Response to Comment PC133-1

The proposed project is not an indoor mall but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment (RDE) component that has enhanced public open spaces and recreational opportunities unique to the waterfront. In fact, as analyzed, the project includes more restaurant, including a public market hall, than retail. Additionally, one of the project objectives is to reduce seasonality. As discussed in the City Council's April 8, 2008 Administrative Report for the zoning amendments, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors."

COMMENT LETTER NO. PC134 CLAUDIA BERMAN

Comment PC134-1

[Refer to PDF of comment letter in Volume II of the Final EIR for graphics]

Hermosa Beach Traffic Impact
Hermosa Beach has been identified as being within the primary market area (10 minute drive for residential market) in Appendix – Market Study. Hermosa will definitely be a significant part of the 12,550 net new vehicle trips.

As a resident of South Hermosa, please consider the following:
1 In the traffic analysis, did you factor in the additional traffic signal on PCH on 2nd street? There are now 2 traffic signals on 2nd street (East and West). If not, that should be factored in. Also, there is now a signalized crosswalk at 3rd street and PCH, and the crosswalk on the 2nd street (west side) had been removed. Please make sure these recent changes have been incorporated. It does not appear that the 2 2nd street signals are in the DIER.

Response to Comment PC134-1

The PCH & 2nd Street intersection is a study area intersection (Intersection #37) that was included in the Draft EIR (in Section 3.13, Traffic and Transportation, and in Appendix L1). Both east and west movements were studied in the analysis of this intersection. In response to Caltrans requirements, a Highway Capacity Manual (HCM) delay analysis was conducted for all study intersections along PCH and included in Tables 3.13-20, 3.13-25, 3.13-34, and 3.13-38 in Section 3.13 of the Draft EIR, which took into consideration delay and queuing effects. Signalized crosswalks are not included in the intersection LOS analysis for the purposes of traffic impact analysis per City of Redondo Beach Traffic Study Guidelines.

Comment PC134-2

2 Is it correct that your transportation analysis models did not including queuing impacts? If that is correct, queuing impacts need to be considered.
a. Hermosa Beach will be heavily travelled from PCH and west of PCH. Hermosa Beach and Manhattan Beach sand section residents use Valley, Ardmore, Hermosa Ave to travel to/from Redondo. Traffic queues should be modeled to understand the backup of traffic on PCH and Valley/Francisca/Herondo (#6). I'm particularly concerned about Valley (#3, #6) queues due to the single lanes, and PCH queues due to the 2 2nd street lights (#37) and PCH/Herondo/Catalina (#7, #10). I'm very concerned since these intersections are already graded C-F on peak times.

Response to Comment PC134-2

A queuing analysis is not required as part of the City's traffic impact study guidelines and therefore was not conducted as part of the Draft EIR. In response to Caltrans requirements, an HCM delay analysis was conducted for all study intersections along PCH, which took into consideration delay and queuing effects. HCM and delay information for all analysis scenarios, including developed mitigations, are detailed in Section 3.13, Traffic and Transportation of the Draft EIR.

Comment PC134-3

b. If MM TRA-1 is implemented, will a traffic signal cause the backing up of traffic through the 2nd st/Valley intersection?

Response to Comment PC134-3

A queuing analysis is not required as part of the City's traffic impact study guidelines and therefore was not

conducted as part of the Draft EIR. Detailed design review will need to be performed before the mitigation is implemented.

Comment PC134-4

c. MM TRA-2 needs to consider the 2 2nd street signals and crosswalk changes with respect to queuing. PCH (#10, #7, #37) is quite a mess today.

Response to Comment PC134-4

Please see Response to Comment PC134-1 above.

Comment PC134-5

3. For the cumulative traffic impact, the following should be noted:
    a. The proposed Hermosa Hotel "The Clash" is now "H2O" and has been approved.
    b. The Provenance Hotel is now called "Strand & Pier".
    c. The AES property is likely to redeveloped. There needs to be some "guesstimate" on traffic from this location factored into a "Cumulative Potential Impact" type of number.
    d. Hermosa Ave may have lanes reduced in order to
    e. Skechers is looking to expand on PCH, which will impact travel from the north. 600+ parking spaces are looking to be built. This should also be factored in to the cumulative impact.

Response to Comment PC134-5

In relation to the related projects mentioned, the cumulative base scenario (2019) was developed using an ambient area-wide growth rate developed from SCAG's population growth forecast for the City of Redondo Beach, as discussed in Section 3.13, Traffic and Transportation, on page 3.13-43 of the Draft EIR. Population growth rates were conservatively used rather than traffic growth rates to estimate future conditions through the year 2019 because SCAG forecasts a slight decline in average City-wide traffic volumes. The SCAG travel demand model was performed and compared to the model-assigned traffic on roadways in the City of Redondo Beach citywide between the base year (2008) and the forecast year (2035). The net change in volumes projects a decline of two percent, due to the transportation infrastructure improvements, land use changes, and policy strategies associated with the Regional Transportation Plan (RTP) and the Sustainable Community Strategy (SCS). Therefore, the use of the population growth rate is considered a worst-case analysis. Additional details about what the SCAG model is and how it was applied in this analysis is provided in Appendix L1 of the Draft EIR.

CEQA allows public agencies to rely exclusively upon (1) growth projections or (2) a list of projects for assessing cumulative impacts. While the City is relying primarily upon the growth projections approach, the City also conservatively incorporated the trip generation from several specific development projects located in proximity to the primary routes of trip distribution for the project site. These specific projects are known development projects with the greatest likelihood to add trips to the intersections located closest to the project site. The traffic estimated to be generated by four development projects in the study area (i.e., Shade Hotel Redondo Beach, Legado Redondo, Kensington Assisted Living Facility and the Seabreeze project) were also incorporated into the traffic volumes to characterize Cumulative (2019) Conditions without Project. The study

intersections are expected to remain consistent with their existing lane geometries under the Cumulative without Project scenario.

In regards to the AES site specifically, City voters rejected Measure B, which would have replaced the current power plant with a development project including 600 new residential units, 85,000 square feet of commercial development, 250 hotel rooms, and 10 acres of public open space. Since the City voters rejected Measure B, and the power plant is not anticipated to change use by the Redondo Waterfront project buildout year (2019), the Draft EIR did not include the AES site as a related project in the development of cumulative base volumes. Any future redevelopment of the AES site (unknown at this time) would require its own environmental review.

Comment PC134-6

Weekends: It has been brought up that the traffic numbers are weekdays only. The traffic study needs to include weekends, since it is on the weekend, that the largest number of people will be going. Also, this should be a "Summer Weekend" number.

Response to Comment PC134-6

Please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project regarding weekend traffic.

Comment PC134-7

4. I did not notice any actual plan for the project to encourage the use of transportation, other than cars. The bike centers' size, seem to be woefully inadequate. Mentioning bikes or public transportation is not a actual plan.

Response to Comment PC134-7

The City of Redondo Beach's General Plan Circulation Element includes goals to reduce trip generation, promote bicycle and pedestrian modes and link existing and proposed bicycle facilities, creating opportunities for physical activity. The Circulation Element includes a number of goals related to active transportation and alternative modes, including the promotion of alternative modes, the pursuit of bicycle and pedestrian priorities, the enhancement of bicycle infrastructure, and the creation of opportunities for physical activity. The proposed project has been determined to be consistent with the General Plan and its Circulation Element. Additional details regarding the General Plan consistency are included in the Section 3.9, Land Use and Planning and Appendix L1 (Section 7.2) of the Draft EIR. In addition, a key feature of the parking management plan suggested as mitigation measure MM-TRA-7 includes supporting trip and emission reduction goals and encourage and support alternative transportation by implementing a Transportation Demand Management (TDM) program as shown on page 3.13-77 of Section 3.13, Traffic and Transportation of the Draft EIR.

Comment PC134-8

Aesthetics and Visual Impacts
Since I live in the sand section of South Hermosa, I frequently drive and walk along Harbor drive. I always enjoy seeing the boats. Although the new Harbor Drive upgrades are a bit of a mess from a traffic/bike path perspective (but better now that most of the sharrow markings were removed), it is really quite beautiful. To say that the project would not have a significant impact on aesthetics is absolutely wrong.

Response to Comment PC134-8

Please refer to the Master Response #9: Views and Scale of Development. Please also see Response to Comments PC134-9 through PC134-16 for additional details. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC134-9

1. Key Observation Views 4-6: Please provide mockups of a typical weekend with the number of people needed to financially support the proposed density. When I see the mockups, I notice the multi-story buildings, not the spec of ocean where people would be standing.

Response to Comment PC134-9

Section 3.1, Aesthetics and Visual Resources, of the Draft EIR, Figures 3.1-8 through 3.1-10, present visual simulations for Key Observation Views 4 through 6, respectively, and provide reasonable representations of how the existing views from various locations will change with implementation of the proposed project. The simulations illustrate how existing views are anticipated to change with structural elements and possible landscaping that may occur with the project. Unlike the features shown in the visual simulations, the presence and appearance of people and automobiles at any particular location within the project site would be transient in nature, varying by time of year, day of week, time of day, weather conditions, special events, and other such considerations. The information and analysis presented in Section 3.1, Aesthetics and Visual Resources of the Draft EIR is reasonable and appropriate for disclosing the impacts of the project and decision-making purposes.

Comment PC134-10

2. Key Observation View 5: The view does improve, since Captain Kidd's would be demoed. But there would be a number of cars here, blocking the view. Same comment as above. Need a more realistic view of cars and people.

Response to Comment PC134-10

Please see Response to Comment PC134-9 above.

Comment PC134-11

3. When walking/driving on Harbor the view would primarily be 2 story buildings with the story parking lot. This would be a negative impact, and not an improvement. Would be good to also have a wide-angle view with mockup comparison to better represent how this would feel from the sidewalk/street. It would give perspective on where the view corridors are not.

Response to Comment PC134-11

The commenter's opinion is noted. Per the Draft EIR page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further,

given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5). Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44. Changes to the site's visual character are analyzed under Impact AES-2, with discussion of the northern portion of the project starting on page 3.1-53. The visual simulation is also presented in Figure 3.1-17 on page 3.1-58 of the Draft EIR, which illustrates the size and scale of project-related structures proposed along the west side of Harbor Drive extending south from Portofino Way. The information provided in the Draft EIR is sufficient for disclosing the impacts of the project and decision-making purposes. As indicated in Section 15204(a) of the CEQA Guidelines, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters on a Draft EIR.

Comment PC134-12

4. Conceptual View: Intersection at N. Harbor Drive and Portofino Way: Would also like to see a mockup of the view taken from across the street to understand the scale of the parking lot. There should be a "existing view" picture here.

Response to Comment PC134-12

Please see Response to Comment PC134-11 above.

Comment PC134-13

5. Conceptual View: Seaside Lagoon: What happens to the aesthetics if the sea lions come ashore? What is the likelihood of that happening?

Response to Comment PC134-13

Section 3.3, Biological Resources of the Draft EIR addresses the potential for sea lions to utilize the proposed seaside lagoon. As discussed therein, it is anticipated that sea lions would prefer to utilize other areas, away from human activity; however, the City is proposing Condition of Approval COA BIO-3: Marine Mammal Management Program, which includes measures to deter pinnipeds (sea lions) from establishing a regular presence in the lagoon or immediate vicinity. The presence of sea lions would not affect the visual character or views associated with Seaside Lagoon. Additionally, refer to Master Response #4: Modifications to Seaside Lagoon for additional information on sea lions and the Seaside Lagoon.

Comment PC134-14

6. Conceptual View: Hotel and the Pier from Kincaid's: That's a lot of large/tall buildings. Seems claustrophobic. Please provide a view comparison for the existing view.

Response to Comment PC134-14

Figure 3.1-3b on page 3.1-18 of the Draft EIR provides several photos of existing views within the southern portion of the project site. The photograph in the lower left-hand corner of that figure provides a view of the boardwalk between Horseshoe Beach and the Pier parking Structure with Kincaid's in the background. That

view captures much of the same segment of boardwalk shown in Figure 3.1-19, Conceptual View: Hotel and the Pier from Kincaid's, on page 3.1-61 of the Draft EIR, with Figure 3.1-3b looking northward and Figure 3.1-19 looking southward. Additional photographs are provided in Chapter 2, Project Description of the Draft EIR (Photographs 2-13, 2-17, and 2-24). As can be seen from the existing photographs, that segment of the boardwalk currently extends along the edge of the Pier Parking Structure with the two-story Pier Plaza development located directly above. At this location, the proposed development would have a similar mass as the existing structure, but would provide a pedestrian oriented frontage as compared to the parking structure.

Comment PC134-15

7. The proposed project will now be a "BIG buildings" feel that is significant. I don't understand how large multi-story buildings in all directions is not a significant impact.

Response to Comment PC134-15

As discussed in the Draft EIR, Chapter 2, Project Description and further described in Section 3.1, Aesthetics and Visual Resources, the proposed project includes a mix of single-story and multi-story buildings, as well as open space, pedestrian and bicycle paths and other at-grade improvements. Based on the extensive information and analyses provided over the 75 pages of Section 3.1, it was determined that the project-related impacts would not exceed the thresholds of significance presented on page 3.1-36 of the Draft EIR. While implementation of the project would result in changes to the existing aesthetics and visual resources, those impacts were determined to be less than significant.

Additionally, as described in Master Response #9: Views and Scale of Development, under 'Massing,' and Response to Comment PC081-1, per the April 8, 2008 report prepared for the City Council public hearing on the zoning for the project site, massing of the project site is considered as supportive of pedestrian oriented development envisioned for the waterfront and as establishing a development that can fully accomplish the Guiding Principles and Revitalization established for the Harbor and Pier area. In addition, as detailed in Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with height limitations set forth in the Coastal Zoning, which are identified in Table 3.9-8, Project Consistency with Coastal Zoning Uses and Key Development Standards.

Comment PC134-16

8. Need to have a diagram showing the heights proposed buildings from the exterior of the project. Having a top down view only via google maps, doesn't show the scale from the ground.

Response to Comment PC134-16

Detailed engineering and design plans have not yet been submitted for City review and approval. The EIR analyzes the most intense scenario that could be developed under the proposed project, including the maximum building heights and intensity. However, Figure 2-8 in Chapter 2, Project Description of the Draft EIR discloses the maximum heights of the individual structures (or range of heights for multi-story structures). The actual building design and heights could vary, but may not exceed the heights and intensities identified in the EIR and required by the zoning code. However, as described in Chapter 2 and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with the height requirements specified in the Coastal Zoning and other relevant land use planning documents. The specific height requirements for each area within the project site are identified in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key

Development Standards in Section 3.9, Land Use and Planning of the Draft EIR. Once design and engineering plans are submitted to the City for review, they would be reviewed for compliance with development regulations specified in the Coastal Zoning and the EIR. (See also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.]; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [In the *Bowman* case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant "…even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense"].)

Comment PC134-17

Project Description
On the project layout, please reference the height on every structure on the diagram.

Response to Comment PC134-17

See Response to Comment PC134-16 above. Also, proposed building heights are noted on the figures showing the project layout in the Draft EIR (such as Figure 2-8 on page 2-49 of Chapter 2, Project Description). The figure shown in the comment is not a figure of the current proposed project. As noted in the comment it is a figure from the Notice of Preparation/Initial Study, which has subsequently been revised, as described in Draft EIR Section 2.4.1 and shown on Figure 2-9.

Comment PC134-18

Mitigation Measures
As someone who lives in the target market and as a potential customer, I'm concerned that there isn't enough parking. The mitigation measures are not specific enough to make them viable.

Response to Comment PC134-18

Please refer to Master Response #7: Waterfront Parking.

Comment PC134-19

For example, there is limited public transportation on the weekends. The Beach Cities Transit runs somewhat hourly, with no specific schedule, and has no GSP tracking. So saying that it is available doesn't make it viable.

Response to Comment PC134-19

The project site has the benefit of being accessible by several bus lines, pedestrian and bicycle pathways, as well as access and parking for vehicles. As discussed under Impact TRA-2 in Section 3.13, Traffic and Transportation of the Draft EIR, the project would not result in a significant impact to transit.

Comment PC134-20

The mitigation measure to have employee parking offsite, needs to say were the site will be, and that site needs to be factored into the project plan.

Response to Comment PC134-20

Please refer to Master Response #7: Waterfront Parking.

Comment PC134-21

The mitigation measures need to be viable, or they should be removed.

Response to Comment PC134-21

Mitigation measures that have been included in the Draft EIR analysis are viable. For a summary of all of the proposed mitigation measures, please see Table ES-5 in the Draft EIR Executive Summary. Refer to Chapter 3, Modifications to the Draft EIR within this Final EIR for any clarifications and/or updates to the mitigation measures.

COMMENT LETTER NO. PC135 CHRIS & GARY COMBS

Comment PC135-1

Thank you, and the City of Redondo Beach, for making the draft Environmental Impact Report available for review. There were a few items that stood out in the report for my family:

There was no "short pier" similar to the one Polly's on the Pier and RB Sport Fishing occupy. My husband and I go to Redondo Beach Pier 1 to 3 times a week. At least one of those trips is for breakfast or lunch at Polly's on the pier. Polly's is also a destination when we have out of town guests it's known world wide. While we do not take boat rides as often as we have breakfast at Polly's that is another frequent destination for us either alone or with in town or out of town guests.

Response to Comment PC135-1

Please refer to the Master Response #5: Sportfishing Pier, Polly’s and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC135-2

There was mention made of opening the enclosed beach area to the ocean. There is a similar beach area north of San Diego and that area is no longer accessible to humans since sea lions have taken over the beach. I'm a huge lover of animals but once they are established there is no practical way to have the animals removed. This is an acceptable situation for me, but a lot of families will be disappointed if the child friendly beach becomes a sea lion paradise.

Response to Comment PC135-2

Refer to Master Response #4: Modifications to the Seaside Lagoon and Draft EIR Section 3.3, Biological Resources, Impact BIO-1 regarding sea lion (“pinniped”) concerns.

Comment PC135-3

The final item that I noted was the sharing of a bike and walking path. Due to the potential for injury to

bicyclists and/or pedestrians it may be more practical to have a dedicated bike path.

Response to Comment PC135-3

As shown on Figure 2-18 on page 2-72 of the Draft EIR (Chapter 2, Project Description) and Figure 3 in Appendix L1, the bike path along the Pacific Avenue Reconnection would be a dedicated bike path separated from the pedestrian walkway. This would connect the dedicated cycle track on Harbor with the Redondo Beach Bike Path. In the interior of the project site, where bicyclist speeds would be slower, the paths are designed to accommodate a mixed flow of users with widths that could accommodate walkers and bicyclists during average conditions, such as along Pier Plaza today and the Hermosa Strand. As part of the City's normal operations, it would be assessed if additional controls are needed. If the need for controls is identified, the controls would be subject to a city ordinance and may vary by time of year, day of the week, peak period usage, etc..

COMMENT LETTER NO. PC136 JANET SPESSERT

Comment PC136-1

I've attended many meetings over the past two years about plans to redevelope the Redondo Pier and Habor area, including the December 9th meeting which was a presentation by CenterCal representatives to explain the DEIR. I was amazed that the woman who gave the presentation could stand there with a straight face and not hang her head in shame at the lies.

Response to Comment PC136-1

Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC136-2

The reasons and explanations she gave as to why each of the many changes have no impact to the community were laughable as they were no where near on point. To say all the changes have no impact on the school recreation is an example. The high school students come down and do cross country training all the time. I watch groups of 20-40 students and their coach several days a week even in the summer. To say opening the Seaside Lagoon to the harbor and reducing its area to less than half will have no impact is another "joke". What is left of the lagoon will be open to the sea lion population and you can "bet the mortgage" they will move in! So a nice safe beach area for families and school and camp field trips will now be open to possibly dangerous wildlife and its pollution. Plus since they are "federally protected" nothing can be done about it. By shrinking the size of the lagoon beach area large groups will no longer have a safe protected area to visit. Seems to me there are some impacts there!

Response to Comment PC136-2

Section 3.12, Recreation fully addresses the use by the public (including school students) of the numerous passive and active land and water recreational amenities at and near the project site. The analysis in the Draft EIR (Section 3.12) determined that the proposed project would not directly or indirectly result in significant impacts associated with recreational resources. Access to the waterfront and existing recreational facilities within the project site would be temporarily restricted during construction. Please see Response to Comment PC081-7 for a discussion of recreational uses during construction.

As for the proposed changes to the Seaside Lagoon, as well as for information on the lagoon and sea lions and pollution, please refer to Master Response #4: Modifications to the Seaside Lagoon. The comment also includes a brief reference to "pollution" associated with Seaside Lagoon. Please see Section 3.8, Hydrology and Water Quality in the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon for discussion of water quality and the Seaside Lagoon.

Comment PC136-3

To now go back and undo all the road changes to Harbor Dr. and Herondo is ridiculous, especially after spending $4.7 million to make the changes after many residents tried to point out the error of that plan. The new CenterCal plan calls for the removal of the International Boardwalk and extending Harbor Drive in its place and to also put a road through the lagoon area and claims no impact. Really???? The current Harbor Drive is already a late night dragway adding another mile will just make it worse. Plus the safe walking and bike riding along the waterway will be gone. What about the impact to police, fire and rescue? The police force is already understaff.

Response to Comment PC136-3

The commenter asserts that the Draft EIR concluded there would be no transportation impacts. Contrary to this assertion, the Draft EIR did find impacts associated with the proposed project; however, these impacts could be mitigated with implementation of mitigation measures described in Section 3.13, Traffic and Transportation of the Draft EIR. Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. The commenter also asserts the project will "undo all the road changes to Harbor Dr. and Herondo." The commenter appears to be referencing the Herondo Gateway project described on Draft EIR page 3.13-17. This statement is not correct. The only change to improvements implemented under the Herondo Gateway project that would be affected by the implementation of mitigation measure MM TRA-2 would involve removal of angled parking stalls on Herondo Street near the intersection with Pacific Coast Highway and replace with parallel parking spaces.

As part of the design for the proposed Pacific Avenue Reconnection, designated bicycle and pedestrian areas would be separated from the roadway, which would enhance safety. For more detailed discussion of safety, please see Draft EIR Section 3.13, Impact TRA-3.

As detailed throughout Section 3.11, Public Services of the Draft EIR, in addition to a relocated Pier Sub-Station (the police sub-station currently located at the site), the proposed project would include on-site private security and security measures to increase site safety, including architectural design (e.g., placement of doors, windows, and staircases to minimize blind spots) nighttime security lighting, security cameras, and providing lighted landscaping that allow for clear sight lines by security personnel and security devices to monitor the site. With the proposed project, the security is anticipated to be better than under existing conditions. As for fire protection services, as detailed in Section 3.11, the Redondo Beach Fire Department would be able to accommodate the proposed project without the provision of additional staffing and facilities and no construction of new or physically altered fire protection facilities (i.e., fire stations) would occur. In addition, the proposed project would remove old and non-compliant buildings and replace them with ones that meet all applicable current state and local codes and ordinances related to fire protection. The proposed project includes the Pacific Avenue Reconnection, which would improve emergency access and protection service throughout the project. Therefore, the proposed project would not result in the need for the construction of new or physically altered

police or fire protection facilities in order to maintain adequate services and, as such, the impact would be less than significant.

Comment PC136-4

Yes, a goodly part of the pier needs repaired and updated. But what did the city do with the funds that were supposed to be held aside for that purpose???? It seems the city council, city staff, city planners and who knows who else have a long history of poor decision making when it comes to spending the tax payers funds.

$1.8 million for the Redondo welcome sign and fountain - fountain can't be used due to power lines

$4.7 million on new bike path and road changes - CenterCal says it all has to be undone for their new plans Performing Arts Center in north Redondo - COSTs the city at least $500,000 per year instead of making any money

Response to Comment PC136-4

The commenter states an opinion relevant to the project that is outside the purview of an EIR. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC136-5

Pier Plaza - basically unused since it was built about 15 years ago - no income for the city

Redondo Beach is actually what is called a "bedroom community" which means people live here and then go out of the area to work etc. Our huge selling point as a city is the beach - the ocean and sand. The wide open spaces and views and the indigenious wildlife. We should protect that "rare gem" and turn it into the draw. If you want to build stores there are several strip malls within a mile of the pier area that are nearly empty. Tear them down and rebuild your stores and movie theater there. Keep our wonderful open beach area the natural attraction.

Response to Comment PC136-5

The proposed project is specifically designed as a new waterfront village, which would provide 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. As such, the proposed project seeks to create a public-private partnership that generates sufficient revenues to support a coordinated revitalization of a waterfront providing broad coastal access and enjoyment. The proposed project would revitalize approximately 36 acres by redeveloping and expanding local and visitor-serving commercial uses, enhancing public access and recreational opportunities and facilities, and improving the aging support infrastructure and parking facilities.

The comment also suggests relocating the project to "several strip malls within a mile of the pier area." This suggestion would not meet most of the project objectives, which are described in Section 2.2 in Chapter 2, Project Description of the Draft EIR. Please also see Draft EIR Section 4.2.3 in Chapter 4, Analysis of Alternatives, for discussion of Alternatives Considered But Rejected As Infeasible, which includes discussion of alternative locations. (See also *Citizens v. Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553,571-573 [The Court held that the analysis of alternative locations in a project level EIR

"would have been in contravention to the legislative goal of long-term, comprehensive planning…case-by-case reconsideration of regional land-use policies, in the context of a project specific EIR, is the very antithesis of that goal.") As discussed in Draft EIR Section 2.1.1.5.8, the project site has been the subject of over a decade of planning efforts, which were approved by Planning Commission, City Council, Coastal Commission, and the Redondo Beach electorate, which specifically allow for development of 400,000 square feet in the Harbor Pier area.

COMMENT LETTER NO. PC137 BRIAN & JANET CASEY

Comment PC137-1

Good evening! We are 16 year residents of Redondo Beach and wanted to officially state our support for the waterfront project. We are excited to see the revitalization of the pier and look forward to the positive benefits the Waterfront will bring to Redondo Beach.

Response to Comment PC137-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC137-2

I wanted to ask 2 clarifying questions regarding the project:

1) Where will the boat dock be located? I would like to ensure that it is not close to seaside lagoon as we are concerned about the polution and potential safety issues around the swimming area.

Response to Comment PC137-2

It is unclear as to which 'boat dock' the commenter is referring to. As shown on Figure 2-16 – Conceptual Marina Reconstruction Plans (on page 2-68 in Chapter 2, Project Description of the Draft EIR), there are side ties proposed for visitor/day boater use. The hand launch currently adjacent to the Seaside Lagoon would be relocated to within the lagoon as part of the proposed project. Under the proposed project, the area of Seaside Lagoon will be open year round. A person wishing to launch a stand-up paddleboard (SUP) or kayak would walk to the launch or directly launch from the beach. Hand launching could also occur at the boat ramp (along the boarding floats). Single vehicle stalls are proposed for parking at the small craft boat launch ramp facility that could be used by SUP and kayakers. Please refer to the Master Response #4: Modifications to the Seaside Lagoon for additional information on safety and pollution, as well as Section3.13, Traffic and Transportation of the Draft EIR, beginning on page 3.13-80, under Impact TRA-3, regarding small craft boat traffic safety and the Seaside Lagoon. As detailed under Impact TRA-3, with implementation of mitigation measure MM TRA-8 (Boat Launch Ramp/Personal Recreational Watercraft Interface Management), the safety hazard would be reduced to less than significant.

Comment PC137-3

2) If this project were to be approved, can we increase the size of the pedestrian walkway along the waterfront? It is my understanding that the proposal is currently for 20 feet of sidewalk space. With the new Waterfront and the myriad of activities that is expected (concerts, yoga, etc...), there will be lots of people

visiting the new waterfront (a likely increase from the number of visitors today) and I would like to see a revised proposal to include a larger sidewalk to accomodate the increase in pedestrian traffic.

Response to Comment PC137-3

As detailed throughout Section 3.9, Land use and Planning of the Draft EIR (Table 3.9-5 on page 3.9-43 and Table 3.9-8 on page 3.9-59), a minimum 12-foot wide paved public esplanade adjacent to the water's edge shall be provided in conjunction with new development or major reconstruction projects, completing the California Coastal Trail through Redondo Beach. As noted in those tables, the proposed project would be consistent with the Coastal Land Use Plan policies and the Coastal Zoning Uses and Key Development Standards by providing a minimum 12-foot wide continuous paved public boardwalk along the water's edge, but generally designed to be 20 feet in width. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC138 MARGIE

Comment PC138-1

Sent from my iPhone. Talk about a disaster waiting to happen!!! These proposals are impossible. The traffic situation in the area is already impossible. Forget it on weekends. People come to this area for the feeling of "open space" and the vast endless ocean with sails and tall palms blowing in the wind uninterrupted by buildings and overdevelopment. This project boasts of a power play for financial gains.

Response to Comment PC138-1

Please see Draft EIR Section 3.13, Traffic and Transportation, which analyzes the projects impacts associated with traffic, including discussion of proposed mitigation measures. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC139 DONNA GUNNAR

Comment PC139-1

This email is to inform you of my support, as a resident of Redondo Beach, for the CenterCal Waterfront Development. It is a beautiful plan and will truly revitalize the waterfront in its entirety as opposed to the "piecemeal" approach which the city has taken so far. I love all of the elements and can't wait to enjoy the many new restaurants and shops. I am at the waterfront nearly every weekend. I love being near the water and watching the marine life and just being outdoors. I do, however, notice that the pier is rundown and definitely needs a facelift. However, I believe by totally revitalizing the whole area at once, we will more closely resemble our neighbors to the north (Hermosa and Manhattan Beaches) in the quality of life we can offer. I believe business lags right now in Redondo and this is a way for Redondo to become more relevant and vital. It would also help our property values to increase.

Please know that many of us support this project. Unfortunately, there doesn't seem to be an organized effort by supporters to band together. In any case, please know that we supporters of the project are out here.

Response to Comment PC139-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC140 ALAN ROSEMBERG

Comment PC140-1

I won't be able to attend the meeting at Crowne Plaza. However my wife and I are very much in favor of the project as described. I own 2 properties in Redondo and encourage my city to move forward with the development. We look forward to Redondo catching up with our neighbors in terms of development and overall attractiveness to business owners, residence, and consumers.

Response to Comment PC140-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC141 JOHN EVANS

Comment PC141-1

Thank you Katie for the opportunity to comment on proposed changes and improvements to the piers and harbor facilities. My name is John Evans and have been an avid user of the pier for fishing, primarily the Monstad Pier. My experience stretches back to before the construction of the stacked parking structure when there was separate up and down roads to the pier from Catalina Ave. I have seen many changes to the pier, many good and almost as many bad . At one point we pier fishermen were faced with the prospect of losing much of the south facing side of the Monstad to a Trutanich development project. Except for the efforts of a councilman and a petition directing the coastal commission to reject Tonys plans because it would violate the provision of the Monstad Charter, which mandates the primary purpose of the pier for recreational fishing. I have personally met strangers in England who have visited Redondo Beach and every person in recollecting their visit have always mentioned the pier and the people catching fish. The Pier and Harbor are known world wide, so it is an important attraction. But like many coastal attractions around the world, there are times when visitors become few. Weather has a lot to do with that as do seasonal changes, so what attracted mostly locals during the off months were the family style restaurants that dotted the pier. Remember the Polynesian and the Cattlemans Steak House and who could forget Castagnolas for great seafood. Those places were not high end restaurants, they were places that working people could afford to take their families to. That is why the pier worked! Why after all the businesses that have come and gone on Harbor Drive can't the Redondo Beach City Council realize this Fact. If you want an attraction to have year round success, you must have a venue that is affordable to all levels of Income, and not just bar traffic, but a family appealing venue. It doesn't have to be high end. My suggestion is look to the successes of the past as a guide, and don't out price the locals. Keep it simple and attractive to all.

Thank you for the opportunity to make what I hope is a positive contribution.

Response to Comment PC141-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on sportfishing at the waterfront. As for businesses at the proposed project, refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The existing Monstad Pier would not be modified by the proposed project, other than some minor modifications associated with its connection to the Horseshoe Pier and Torrance Circle. Please See Draft EIR page 2-28 (Chapter 2, Project Description) for additional details.

The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC142 SY SHEYBANI

Comment PC142-1

Why add the hotel and a movie theater? Take a look at the monstrosity being built next to Cheesecake Factory and tell me why we need more. Movie theater next to the beach! Just ridiculous.

Response to Comment PC142-1

As for businesses at the proposed project, refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. As also discussed in Chapter 2, Project Description of the Draft EIR, one of the project objectives is to reduce seasonality, by including facilities such as the movie theater. As discussed in the City Council's April 8, 2008 Administrative report for the project site's zoning, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors."

The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your opinions will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC142-2

Please if your going to spend money add more parks a open vistas. Nobody wants more malls or retail space - we all have cars. Don't sellout to big money.

Tell central cal to take a hike.

Response to Comment PC142-2

The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your opinions will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC143 BECKY APPLEGATE

Comment PC143-1

I recently attended the meeting at the Radisson Hotel regarding our City's Waterfront project. I have not had opportunity to review the entire plan that is publicly available, but I would like to offer just a few thoughts.

The waterfront project is beautiful and from the drawings I have seen, very tasteful for our community.

In the 1980s, I invested in a real estate investment trust for a strip mall in Marina del Rey. The plans and business strategy all had a rosy outlook, but what they did not expect was a less than desired occupancy of available space. I look around much of the South Bay – Redondo Beach and Torrance, and feel discouraged at the number of stores and restaurants that have closed down. I worry that we are experiencing a contraction in our local economy that might effect the success of the Waterfront project as planned. The retail/restaurant/movie theatre/hotel development is a cookie cutter plan that might be overdone (repeated) and I'm not sure it is the right activity to take up waterfront space.

When the strip mall in Marina del Rey could not fill their spaces, they fell behind on their first trust deed from a bank in Canada. When they tried to make up payments as funds were available, the bank refused anything less than payment in full, and thus, the strip mall went belly up. While people were licking their chops about someone else spending millions of dollars in our front yard, I worry if the business part doesn't pan out and we have a zillion dollar albatross on our beach.

Response to Comment PC143-1

As for the projects economic vitality, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC143-2

I am not a community planner but I thought that recreational areas with user fees would be safer as a waterfront project. Possibly:

1.
Enlarge the marina and put in a yacht club;

Response to Comment PC143-2

King Harbor already has a yacht club (the King Harbor Yacht Club at Mole A), as described in Draft EIR page 2-17. The proposed project is specifically designed as a new waterfront village, which would provide 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. The Draft EIR also includes a reasonable range of alternatives, which were analyzed in Chapter 4, Analysis of Alternatives of the Draft EIR. An EIR does not need to analyze every conceivable alternative or permutation thereof. (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.) However the commenter's suggestion will be included in the Final EIR are considered by the decision-makers.

Comment PC143-3

2.
An Alta Vista like area for reserved volley ball courts, handball, tennis – maybe built as a venue that could be used for professional tournaments;

Response to Comment PC143-3

The proposed project and the alternatives include both active recreational areas (such as a small craft boat launch ramp facility, Seaside Lagoon, and fishing from southern area of Horseshoe Pier), as well as passive recreation (enhanced public open space, pedestrian and bicycle circulation, and boardwalks). No venue for sports such as handball or tennis are being proposed. An EIR does not need to analyze every conceivable alternative or permutation thereof. (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.) However, the commenter's suggestion will be included in the Final EIR presented for review and consideration by the City's decision-makers.

Comment PC143-4

3.
A better Seaside Lagoon.

One of the things about Seaside Lagoon was that the user fees did not necessarily come from just Redondo residents. Many families from other areas came to enjoy the beach in a safe setting for their children. I put out the above ideas as they provide healthy, outdoor activity that reflects beachside living.

Response to Comment PC143-4

The proposed project analyzed in the Draft EIR does include enhancements and modifications to Seaside Lagoon. As detailed in Chapter 2, Project Description of the Draft EIR (beginning on page 2-57), the Seaside Lagoon would be converted from the existing enclosed swimming lagoon into a small embayment directly connected to King Harbor. By opening the lagoon to the waters of King Harbor, a tidally-influenced lagoon would be created. This would establish a sheltered natural beach that is open year-round. The open lagoon would provide access from the lagoon's new public beach to King Harbor for canoes, kayaks, and paddle boards. There would still be a rock inlet opening and a sandy beach.

Comment PC143-5

The waterfront has lovely waterways but the activities are not beachside living-it's beachside spending/eating.

Response to Comment PC143-5

The commenter states opinions and comments, but does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC144 GRETCHEN LLOYD

Comment PC144-1

Comments on the DEIR

It is misleading to state the project encompasses 36 acres when half of that is ocean. Please address the true size of the actual land space (15 to 18 acres) to be developed as opposed to the size stated in the DEIR as 36 acres.

ALL impacts must we weighed against ONLY the true size of the land to be built on and not include the water areas.

Response to Comment PC144-1

As explained in Section 2.3.2.1 in Chapter 2, Project Description (beginning on page 2-16) of the Draft EIR, and shown on Figure 2-4 (page 2-18), the project site is an approximately 36-acre portion of the waterfront (approximately 31.2 acres is land, including Seaside Lagoon, and 4.8 acres is water area made up of Basin 3 [3.5 acres] and the proposed boat ramp area at Mole C [1.3 acres]). As explained further in footnote #1 on page 2-16, during the process of selecting a developer for the proposed project, the site available for commercial development was identified as 15 acres. This figure was an estimate based on the size of the leaseholds and did not include areas that are within the project site boundary analyzed in the EIR. Specifically, the 15-acre estimate did not include the northwestern portion of the project site (Seaside Lagoon and the proposed boat launch ramp and boat launch ramp parking lot), the parking structures, the Pier Entry Plaza, and Torrance Circle, which are now included within the project site. In addition, although the Notice of Preparation identified the project site as being approximately 35.5 acres, for the purpose of the EIR the acreage has been rounded up to be approximately 36 acres. Land and water acreages are also rounded for purposes of the EIR.

As required by Section 15378 of the State CEQA Guidelines, a ‘project’ means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonable indirect physical change in the environment. Since the proposed project includes project elements on land, and land adjacent to the waters of King Harbor, as well as elements within the waters of King Harbor, the Draft EIR appropriately analyzed the environmental impacts of the proposed project on land and water areas.

COMMENT LETTER NO. PC145 TAHERI RANGWALA

Comment PC145-1

I would like to congratulate you folks on the road map ahead to affluence of Redondo Beach. I would be very much interested in enhancing the existing beauty and affluence of the area with your help in building luxury apartments in access of 1000 units. I have an existing client/partner who would be very much interested in acquiring such a property and I would appreciate if the city council members would help me attain my objective

I would like to congratulate you folks on the effort put forth by your team and wish you the best in 2016 to be able to have more project of this nature to come up on the waterfront

Response to Comment PC145-1

The comment is not relevant to the project and is outside the purview of an EIR. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC146 JANE AFFONSO

Comment PC146-1

Here are my comments on Draft Environmental Impact Report:

The draft Environmental Impact report is unacceptable because it does not accurately reflect the true environmental impacts from such a large and inappropriate development next to the seaside. It's minimization of impacts on traffic, air quality, water quality of our ocean and views are blatantly understated. It also does not reflect the loss to the community of access to our ocean due to reduced boat ramp capacity, access to fishing pier and completely out of scale development for the site. The traffic figures are inconsistent: 22,234 per day doesn't square with 12550 new car trips and it doesn't include increased traffic from the bike lane which will tie up those turning into the lane. It also does not address the compounding effects of traffic from the Shade hotel and development of the AES site. The water quality will be negatively impacted by the open access of the Seaside Lagoon to the ocean.

Response to Comment PC146-1

Impacts associated with the construction and operation of the proposed project are summarized in Section ES.7, Summary of Environmental Impacts of the Proposed Project and Alternatives (beginning on page ES-30) in the Executive Summary associated with the Draft EIR. The Draft EIR analyzed the potential impacts of implementation of the proposed project on 14 resource areas. Although a majority of the impacts were found to be less than significant or less than significant with implementation of mitigation, the Draft EIR analysis did determine that there would be a total of six significant and unavoidable impacts of which four would occur during construction (short-term throughout the 2.25 to 2.5 years of construction), two would occur specific to the operation of the project, including one impact (i.e., tsunami hazard) that would continue at the project site (although with implementation of mitigation measure the impacts would be reduced) due to natural uncertainties of such an event occurring in the future. Table ES-5 and Table ES-6 in the Executive Summary (beginning on page ES-35) identify significant and unavoidable impacts associated with the proposed project. Details regarding the environmental analyses for traffic is in Section 3.13, air quality is in Section 3.2, water quality is in Section 3.8, and views is in Section 3.1 of the Draft EIR. Impacts associated with the removal of the boat hoists and new small craft boat launch ramp facility, and the possible removal of the Sportfishing Pier, as well as the potential impacts (and benefits) associated with the opening the Seaside Lagoon to the tidal waters of the harbor are all thoroughly analyzed within the Draft EIR. A summary of those impacts can be found in Table ES-5 (beginning on page ES-35) of the Executive Summary to the Draft EIR.

The commenter also implies an inconsistency between trip generation values referenced in the EIR: 12,550 and 22,234. As provided in Table 3.13-11, the reference to 22,234 trips is referring to the trip generation for all of the proposed uses, *including existing* and proposed trips. The 12,550 value referenced as the “NET NEW EXTERNAL PROJECT TRIPS” *and* is providing the change in trip generation in comparison to baseline conditions. The comparison to baseline conditions is used for calculating the project’s impacts, consistent with methodology provided under CEQA Guidelines Sections 15125(a) and 15126.2(a).

Although it is not clear as to exactly what the commenter is referring to regarding increased traffic from the bike lane tying up turning into “the lane,” similar to existing conditions, bicyclist and pedestrians will have the right-of-way; however, while the project will introduce new vehicular crossing locations associated with additional driveway locations on Harbor Drive, these crossing locations would be designed to applicable

standards and best practices. Applicable design standards include providing elements such as high-visibility crosswalk markings at all crossing locations, and raised crosswalks, where feasible, to provide a safe and compatible area for bicyclists along the roadway. As such, the proposed project is not expected to significantly impact vehicle and bicycle modes.

Please also see Master Response #1 and #2, which discuss the AES Power Plant Site and the Cumulative Analysis methodology, respectively. As discussed therein, the Shade Hotel Project was expressly accounted for in the cumulative traffic analysis. (See Draft EIR page 3.13-44.)

Comment PC146-2

This project is a poor use of waterfront property and not best for the community or the environment. This massive development which will include movie theaters and more retail space is not conducive to enjoying the waterfront: boating, swimming, strolling, bike riding and views are not adequately protected. The amount of traffic and pollution from his project will harm residents and other visitors. I know the financial structure of the deal is not the purview of this report but its one-sided nature in favor of Center Cal may have had an impact on why this report so understates the true impacts of this project.

Response to Comment PC146-2

Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site**.** Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As detailed in Section 3.2, Air Quality, of the Draft EIR, air pollutant emissions associated with the operation of the proposed project, including traffic associated with employees and patrons, was analyzed for the proposed project. While there would be a significant construction related air quality impact, the analysis found that proposed project would not exceed the regional thresholds established for the operational emissions of criteria air pollutants within the air district at either the project or cumulative level. In addition, the analysis determined that during operation the proposed project would not expose sensitive receptors to significant localized concentrations of criteria pollutants, nor would the proposed project expose sensitive receptors to objectionable odors or to localized significant pollutant concentrations with respect to traffic emissions and toxic air contaminants. The comment does not introduce new environmental information; however, the suggestions will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC146-3

This EIR must not be approved. Please have someone with more objectivity prepare a document that is deserving of the residents of and visitors to Redondo Beach.

Response to Comment PC146-3

The Waterfront Draft EIR was prepared in full accordance with the requirements of CEQA. Pursuant to Section 15084(d)(2) of the State CEQA Guidelines, the City of Redondo Beach, as Lead Agency for the project consulted with CDM Smith and its subconsultants (see Chapter 7, List of Preparers of the Draft EIR for a list of the consultant team members), to prepare the Draft EIR and, pursuant to Section 15084(e). The Waterfront Draft EIR that was sent out for public review reflects the independent judgment of the City of Redondo Beach.

COMMENT LETTER NO. PC147 NANCY CHENAY KENNEDY

Comment PC147-1

Please save the little pier. It is a historical landmark. It makes Redondo Unique. It is home.

Response to Comment PC147-1

The Draft EIR's cultural resource chapter determined that the Sportfishing Pier was a historic resource and disclosed that its demolition would result in a significant impact; please see Draft EIR pages 3.4-51 through 52. As also discussed on Draft EIR pages 3.4-65 through 66, preservation of the existing Sportfishing Pier is not considered feasible and historic resource impacts are considered significant and unavoidable. However, the decision to rebuild the Sportfishing Pier is an option include in the proposed project. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for additional details.

COMMENT LETTER NO. PC148 JOY CORRADETTI

Comment PC148-1

Redondo Beach has been my beloved home for over 25 years. I truly love this wonderful beach community, and have always felt that it is "LAʿs best kept secret!" Because I was so passionate about Redondo, I opened a small gift shop four years ago on the International Boardwalk called, Mystical Joy. Knowing firsthand how much the waterfront is crumbling and in need of dire repair, I truly believe CenterCalʿs vision and plans are exactly what is required for the future generations of Redondo Beach.

I am excited about the environmentally conscious CenterCal project, and I think it is best plan for the City of Redondo. Let us finally reveal our "best kept secret", and share openly our remodeled community and waterfront to neighboring Angelinos to enjoy as well. This will not only enhance our property values and commerce but will aesthetically beautify and strengthen our amazing community for years to come.

Response to Comment PC148-1

The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC148-2

Redondo Beach has been my beloved home for over 25 years. I truly love this wonderful beach community, and have always felt that it is "LAʿs best kept secret!" Because I was so passionate about Redondo, I opened a small gift shop four years ago on the International Boardwalk called, Mystical Joy. Knowing firsthand how much the waterfront is crumbling and in need of dire repair, I truly believe CenterCalʿs vision and plans are exactly what is required for the future generations of Redondo Beach.

I am excited about the environmentally conscious CenterCal project, and I think it is best plan for the City of Redondo. Let us finally reveal our "best kept secret", and share openly our remodeled community and waterfront to neighboring Angelinos to enjoy as well. This will not only enhance our property values and commerce but will aesthetically beautify and strengthen our amazing community for years to come.

Response to Comment PC148-2

Please refer to Response to Comment PC148-1 above.

COMMENT LETTER NO. PC149 EUGENE J SOLOMON

Comment PC149-1

Several concerns regarding the EIR

1) The completed traffic study does not account for any proposed development at the 50 acre AES site. Failing to consider impact of possible future projects is a major flaw in this report. Development at the AES site may significantly spike number of trips per day and impact on traffic, noise, pollution and resource degradation. According to CEQA it is a mandatory finding of significance to not consider impact cumulatively. The study is flawed per se. Impact from traffic is significant. SCAG models do not accurately account for the spike in usage due to likely new development. A revised study should be completed.

Response to Comment PC149-1

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As for the future AES project and cumulative impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis.

Comment PC149-2

Further, the mitigating efforts for the traffic impacts listed are flawed in context. Major arteries feeding ingress and egress to the development are currently rated "F". The existing over saturation of this corridor (PCH) will lead to degradation of PCH, lost productivity for residence and negative lifestyle impacts.

Response to Comment PC149-2

Please refer to the traffic analysis in Section 3.13, Traffic and Transportation of the Draft EIR for details on the existing level of service (LOS) associated with the project study area traffic. For a summary of the traffic results in the Draft EIR, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC149-3

2) Concerns of Urban Blight and a hotel. The AECOM report estimating the economic viability of the Boutique Hotel state the hotel would need to "capture a significant portion of the citywide demand". The report further states "sufficient demand for between 70-150 upper priced hotel rooms." With 620 rooms coming online locally in the next 5-10 years the hotel is set up for failure based on the numbers provided. A needed 80% occupancy rate seems unlikely to succeed.

Additionally, the sharing economy of Air BNB and VRBO further saturate the marketplace with over 1000 places to rent in the South Bay. By virtue of these facts and the AECOM report a hotel will likely suffer from a lower than average occupancy rate and fail.

3) Concerns of Urban blight and a movie theater. Problems with removal of view corridors. The movie theater industry is a deteriorating business model. The Motion Picture Association of America (MPAA) reports movie attendance down every year in the last fifteen. Box Office has maintained levels only by increasing ticket prices. In 2014 U.S. box office actually declined. "Frequent Movie Goers" have declined in every demographic except for teenagers. Teenagers are not the target demographic of the new theater. In the last five years theaters have closed in Manhattan and Redondo Beach. This enterprise is set up to fail based on economic models and markets trends. This monolith will sit little used while blocking view corridors.

4) Concerns of Urban Blight retail failures. According to a report conducted by the Urban Land Institute for Manhattan Beach a store should produce receipts of $1200/ square foot to be successful at $10/square foot. The AECOM report estimates rents between $7-11/ square foot for the project. Stores that typically produce these kinds of revenue are Apple and Tiffany. Consider 50% of small business will fail in the first year. Fully 95% will close doors before their fifth year. Retail stores have a higher failure rate in areas with a high concentration of restaurants with high traffic areas being most important for success but often too high an initial investment.

For restaurants the failure rate is slightly lower with 60% of all restaurants failing after five years. The numbers listed above are courtesy of Cornell University and Michigan State University studies.

The retail and restaurant spaces making up more than 50% of the planned space will suffer from high turnover and vacancy rates leading to crime problems typically associated with high vacancy therefore leading to Urban Blight.

Response to Comment PC149-3

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, which addresses viability of project elements including the hotel, specialty movie theater, and retail uses. Additionally, as discussed in the AECOM Market Study prepared for the proposed project (Appendix O of the Draft EIR) there are advantages to the project site that would serve to attract hotel visitors, including the waterfront views from all rooms and proximity to waterfront recreation and retail and restaurant development. Restaurant and conference/banquet facilities would also attract business. Regarding other lodging options, the AIR BNB and VRBO market typically attract a different segment of the market as compared to the proposed boutique hotel, and thus direct competition is not expected. Please also see Draft EIR Section 5.6, which discusses Urban Decay.

The proposed project has unique features, including the waterfront location and associated recreation opportunities that would draw residents and visitors to the area. Further, as discussed in Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, some of the current tenants, which have an established customer base, would be given the opportunity to remain at the project site. The returning businesses would be expected have continued support from existing clientele, in addition to drawing new customers.

It is important to note that the AECOM Market Study provides a detailed evaluation specific to the characteristics of the proposed uses within the markets particular to the project area, with all assumptions and analysis methodologies documented therein. The information and analysis contained within the AECOM Market Study provides substantial evidence in support of the conclusions presented in the Draft EIR. The snippets of information presented by the commenter without complete citations to the source materials does not allow one to check on the accuracy, applicability, or context of the subject claims. The comment also states “Problems with removal of view corridors.” While the precise nature of the comment is unclear, the reader is

directed to Draft EIR Section 3.1, which addresses aesthetics, including analysis of local valued views. Please also see Response to Comment PC134-11, which discusses views along Harbor Drive.

Comment PC149-4

The Urban Blight and traffic issues listed are significant and measurable. The developer should take steps to eliminate or account for these items.

Response to Comment PC149-4

See Response to Comment PC149-3 and Master Response #3: Economic Vitality And Compatibility Of Businesses at the Project Site regarding urban blight. Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

COMMENT LETTER NO. PC150 ANNEKE BLAIR

Comment PC150-1

Thank you for your response. I apologize but I am not sure with all the information you provided that I have my question answered. My question of "does that include space that can be used by say a restaurant or bar for patio seating" specifically.

I continue to review the DEIR and compare it to renderings and it seems like the majority of "open space" is either a walkway or adjacent to a business and will be used by many of them as patio space or store front.

Response to Comment PC150-1

Pursuant to the Redondo Beach Municipal Code (RBMC) Section 10-5.1622, the project may include outdoor dining areas. (See also Draft EIR page 2-56, noting the project may include “outdoor and patio seating along the public boardwalk adjacent to the water’s edge.”) Within the areas considered public open space, seating areas (which may include various types of seating and tables) would be available for public use (i.e., it would not be limited to customers of any particular subtenant). As discussed in Response to Comment PC134-16, not every engineering level detail and specific subtenant are known at this time and no locations of such public seating/patio areas have been identified. Any outdoor dining associated with individual subtenants outside of the area identified as open space would depend upon the intent of the individual subtenant and would require a Coastal Development Permit that demonstrates that no adverse impacts to pedestrian public access would occur.

Comment PC150-2

I also have a question about the finding of no view impacts. I have seen the Center of the City that compares the same view and determined significant impact but the Waterfront DEIR does not find any impacts to views. I also can't understand how the viewing corridors are seen as comparable to what we have now when we look out across harbor drive to the ocean. I don't look down at the parking lot, I look across to the harbor and ocean views. Can you tell me how the no impacts to views was determined?

Response to Comment PC150-2

The commenter asserts that under existing conditions along Harbor Drive “I don’t look down at the parking lot,

I look across at the harbor and ocean views." However, this is not an accurate description of baseline conditions. As noted in Draft EIR Section 3.1, Aesthetics and Visual Resources, page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5). Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44 through 45. The Draft EIR determined that some views would be modified by the project, however these impacts were determined to be less than significant. The methodology for determining the view impact is described in the Draft EIR in Section 3.1.4, beginning on page 3.1-34. Changes to the visual character are described under Impact AES-2 in Section 3.1.

See Response to Comment PC323-50 regarding the view analysis for the Heart of the City EIR and the view analysis of the proposed project.

Comment PC150-3

Also regarding recreation, was the construction time taken into consideration for no impacts? It seems that everything from the bike path to portions of the harbor will be closed for significant amounts of time during the construction. Where will the bike path be rerouted during construction?

Response to Comment PC150-3

Section 3.12, Recreation of the Draft EIR (in Section 3.12.4.3.2, beginning on page 3.12-32) analyzed impacts to recreation during the approximately 27 to 30 months (2.25 to 2.5 years) construction period, including access to existing recreational facilities within the project site that would not be available as the entire project site would be closed to the public, with the exception of some limited access to facilities on, and near, the Horseshoe Pier (i.e., access to Kincaid's restaurant at the northern segment of the Horseshoe Pier and the Monstad Pier).

More specifically, the analysis determined that construction of the proposed project would result in temporary closure of existing on-site recreational facilities including the Seaside Lagoon, Sportfishing Pier, Redondo Beach Marina, boat launch facilities (boat hoists and hand launch), a majority of the Horseshoe Pier, and on-site walkways and bike paths within the project site. The Redondo Beach segment of the South Bay Bikeway would be temporarily rerouted along Pacific Avenue, Catalina Avenue, and Torrance Circle/Boulevard as shown in Figure 3.12-11 (on page 3.12-33). This would allow continued bicycle connection to the north and south of the project site. As a result of the temporary closures of on-site facilities during the construction phase of the proposed project, there could be a temporary increase in the use of other existing recreational facilities during proposed project construction, to the extent users seek alternative facilities/locations for such recreation. However, the recreational users would not all visit the same alternate location, as the project site is within a

region that has a wide variety of recreational opportunities available, both within a short distance of the project site and throughout Los Angeles County and the whole Southern California region. Section 3.12 provides a summary listing of the general types of coastal recreational opportunities currently available at the project site that are also available elsewhere in Los Angeles County or as otherwise noted. Recreational facilities located outside of the project site (e.g., King Harbor, Veterans Park, bike path to the north and south, and County Beach) would remain open to the public throughout the construction period.

The no impact associated with recreation and the proposed project is associated with the implementation of the project not requiring construction or expansion of recreational facilities outside the project boundary of the project site and would not occur as part of proposed project. As detailed under Impact REC-2 (beginning on page 3.12-42 of the Draft EIR), the proposed project would not result in population growth that would increase the demand for new or expanded recreational facilities; therefore, the proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment not already addressed as part of the proposed project and thus no impacts would occur.

Comment PC150-4

Will SUP's be able to launch and navigate in the harbor?

Thanks for your help, I appreciate it.

Response to Comment PC150-4

During construction, stand up paddle boards (SUP’s) will continue to be launched in other areas within the harbor. Under operation of the proposed project, SUP’s will be able to launch from the Seaside Lagoon and new small craft boat launch ramp facility and navigate in the harbor.

Comment PC150-5

Hello Anneke,

Open space is calculated as set forth in the City's Municipal Code for open space in the coastal zone that qualifies for a floor area ratio bonus. Pursuant to Municipal Code Sections 10-5.813, 10-5.814, 10-5.815:

- Parking areas (including landscaped areas within parking areas) shall not be counted as public spaces for purposes of qualifying for a floor area ratio bonus.

- Open space qualifying for a floor area ratio bonus shall be accessible to the public and not be fenced or gated so as to prevent public access.

- Open space qualifying for a floor area ratio bonus shall be contiguous to the maximum extent feasible.

- Areas less than ten (10) feet in width shall not count as open space for purposes of qualifying for a floor area ratio bonus.

The Municipal Code can be accessed here:

http://www.qcode.us/codes/redondobeach/

Specifically, see the following:

Title 10 PLANNING AND ZONING

Chapter 5 COASTAL LAND USE PLAN IMPLEMENTING ORDINANCE
Article 2. Zoning Districts
Division 3. C2, C3, C4, C5A, and CC Commercial Zones

Katie Owston
Project Planner - The Waterfront
Community Development Department City of Redondo Beach
(310) 318-0637 Ext. 1-2895
katie.owston@redondo.org

From: anneke blair <annekeblair55@gmail.com> **Sent:** Wednesday, December 30, 2015 10:07 AM **To:** Katie Owston; Steve Aspel; Jeff Ginsburg **Subject:** Re: The Waterfront DEIR

Thank you for the update, I look forward to your response.

On Dec 30, 2015 10:49 AM, "Katie Owston" <Katie.Owston@redondo.org> wrote:

The City is closed for the holidays until January 4th

Katie Owston
Project Planner - The Waterfront
Community Development Department City of Redondo Beach
(310) 318-0637 Ext. 1-2895
katie.owston@redondo.org

From: anneke blair <annekeblair55@gmail.com> **Sent:** Tuesday, December 29, 2015 9:35 AM
To: Katie Owston; Steve Aspel; Jeff Ginsburg **Subject:** Re: The Waterfront DEIR

Hello,

I wanted to follow up with you as I have not received a response nor did I receive an out of office.

Is this something you can assist me with? If not, can you please tell me who is able to answer my questions.

Who can the residents ask questions about the DEIR since we weren't able to at the first review? On Dec 22, 2015 2:56 PM, "anneke blair" <annekeblair55@gmail.com> wrote:

Hello,

I am trying to understand the DEIR for The Waterfront project. Can you please tell me how the open space is calculated? What are the definitions of open space? Does that include space that can be used by say a restaurant or bar for patio seating?

Response to Comment PC150-5

Comment PC150-5 includes information provided to the commenter. Please refer to Response to Comment PC150-1 above.

COMMENT LETTER NO. PC151 JOHN CONYNE

Comment PC151-1

To whom it may concern:

I am writing to register my dismay at the scope of the massive CenterCal waterfront project. The idea that our beautiful harbor is scheduled to be packed with view-blocking development containing too much retail in a region where malls are already plentiful and face ongoing challenges is utterly insane. We do not want or need yet another hotel or a seaside movie theater in our community, either.

Response to Comment PC151-1

Please see Draft EIR Section 3.1, Aesthetics and Visual Resources for analysis of views. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your opinions are noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC151-2

And yes, it is a mall, shills claims notwithstanding. CenterCal builds nothing but malls, and companies do not invest $300 million straying from their core competency.

Response to Comment PC151-2

The comment does not introduce new environmental information. However, your opinions are noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC151-3

Revitalization on our waterfront is going on right now, and should be allowed to continue in a coast and community-friendly fashion. As has been pointed out elsewhere, just some of those improvements include:

- Tarsans shop opened
- Expanded parking lot for Bay Club
- $4.7M bike track and landscaping
- Shade Hotel nearing completion
- Parking lot at former Triton dirt lot
- Totally refurbished Redondo Hotel
- New ground floor interior for Crowne Plaza
- Portofino hotel refurbishment
- Portofino Marina replacement
- Refurbished all Seaside Lagoon facilities
- Meistrell Brothers Statue
- Extended hand launch boat ramp
- Harbor mooring field
- Seal barge
- Harbor Patrol building
- R10 restaurant
- Paddlehouse

- A Basq restaurant
- Slip bar and restaurant
- King Harbor Brewery tasting room
- Barney's Beanery
- Demolition of old octagonal building
- Refurbishment of Redondo Landing
- Boat hoist refurbishment
- Refurbishment of Marina apartments
- Grant submission for new boat ramp
- Grant submission for Seaside Lagoon
- New management of Pier Plaza now cash flow positive

Response to Comment PC151-3

The comment does not introduce new environmental information. However, your opinions are noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC151-4

We do not want a repeat in Redondo Beach of the negative impact a CenterCal mall has had on local small businesses in Tualatin, OR:

http://tualatinlife.com/new/wp-content/uploads/2014/07/54-CenterCal.pdf.

Response to Comment PC151-4

The commenter states an opinion relevant to the developer that is outside the purview of an EIR and does not introduce new environmental information. However, your opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC151-5

Finally, I live in District 1, where our Council member must recuse himself from discussions on the waterfront development project--the Number 1 issue facing this city--due to conflicts (plural) of interest. As such, I find him useless to his constituents and believe he is making a mockery of the position. He should resign immediately.

Response to Comment PC151-5

The commenter states an opinion that is outside the purview of an EIR and does not introduce new environmental information. However, your opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC151-6

Please acknowledge receipt of these comments, and mark me down as a resounding "No!" on the matter of community "support" for this ridiculous waterfront sellout and obscene, steroidal overdevelopment.

Response to Comment PC151-6

Your opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC152 GREG DIETE

Comment PC152-1

Please confirm receipt. Thanks … Greg Diete …

It is hard to believe that the "mammoth" size of this Water Front Project per the DEIR has no significant impact to King Harbor/Pier area and the surrounding communities.

Response to Comment PC152-1

The Draft EIR determined there would be several significant and unavoidable impacts. Please see the Executive Summary of the Draft EIR and Response to Comment PC146-1 above, for additional details.

Comment PC152-2

I think, if the developer, CenterCal, had been honest with the people who attended the public meetings at the Redondo Beach Performing Arts Center many of these questions would not be necessary.

The public meetings with the developer and young student architects became a different "development" at the very last meeting with roads, tall walls of concrete garages and an 800' long hotel added. Everything was kept "flat" .... two dimensional, CenterCal never produced the simple 3 Dimensional model they had promised to the public. The public was not permitted to speak or ask any questions at this last meeting. After that last meeting CenterCal went into "hiding" so to speak. World famous architect Frank Gehry worked with cardboard models of the projects he designed. The "public" deserves the promised 3-D model.

Response to Comment PC152-2

The Draft EIR includes visual simulations in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) which were based on the peer reviewed 3D computer model. CenterCal also prepared a video of the proposed project (available at http://www.thewaterfrontredondo.com/the-plan.php#video) which includes a computer 3D model of the proposed project.

Comment PC152-3

Why does the DEIR find no significant "Public View" blockage/elimination from this 500,000 square foot commercial development with two multi-story garages for 1OO's and 1OO's of vehicles?

Response to Comment PC152-3

The methodology and the analysis for determining the view impact is described in Section 3.1.4, beginning on page 3.1-34, of Section 3.1, Aesthetics and Visual Resources of the Draft EIR. Please see the analysis of views under Impact AES-1 in Section 3.1 of the Draft EIR for additional details.

Comment PC152-4

Instead of costly mammoth garages, half empty most of the year ..... have a private valet parking system during peak times. Later on .... if the Water Front Project is wildly successful a parking garage could be part of the AES site development.

Response to Comment PC152-4

Parking for the proposed project complies with RBMC Section 10-5.1706, which requires off-street parking for the uses at the project site. As described in Master Response #7: Waterfront Parking, this would include shared parking and valet parking.

Comment PC152-5

Why does the DEIR not find "Public View" blockage/elimination from Harbor Drive, the Linear Park at Diamond St. and Veterans Park? The DEIR Figure 2-8 shows 900' of Harbor Drive with only a 120' wide potential Ocean view corridor, because of the SCE easement. Ocean views from the Linear Park are blocked by Building F and Veterans Park Ocean views are blocked by the parking garage and Hotel.

Response to Comment PC152-5

Regarding views along Harbor Drive, the baseline conditions are described on Draft EIR page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5). Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44 through 45.

The commenter also appears to be referring to Czuleger Park. As discussed in Section 3.1.4 of Section 3.1, Aesthetics and Visual Resources of the Draft EIR, impacts on views displayed as Key Observation Views 1 through 3 in Czuleger Park would be less than significant as the most of the existing views of the water and horizon would remain. Please see Draft EIR page 3.1-42 and Figure 3.1-7 for additional details. Also see Response to Comments PC323-30 and PC323-47, regarding views from Czuleger Park.

The primary views of the ocean from Veteran’s Park are straight to the west, overlooking the park and the beach. Views of the project site are largely obscured from the Redondo Landing and Monstad Pier. However, views of the project site are available from the northeast edge of Veteran’s Park. The proposed parking structure and hotel in the southern portion of the project site would have a similar height and similar footprint as the existing Pier Parking Structure and Pier Plaza development, and no substantial changes in the view from Veteran’s Park would occur and the impact would less than significant.

Comment PC152-6

Why is this 6,800 page, $1,000,000+ DEIR void of any building and parking structure height elevations except for possibly the Conceptual Site Plan Figure 2-8?

Why does the CSP Fig. 2-8 shows "height" numbers that are less then 1/16" in height and can barely be read with a magnifying glass?

What does T.O.P. on CSP Fig. 2-8 mean?

Why do at least eight buildings/structures have "heights" that exceed the "2010" Measure G 45 foot height limit?

Does the CSP Fig. 2-8 showing a 55' 0" T.O.P. number on the PIER garage comply with Measure G? How does the CSP Fig. 2-8 PIER garage plus the height of vehicles parked on top comply with Measure G?

Does the height of the 1978-80 Ron Saffren Development (PIER Plaza) plus the existing PIER garage on which it is built comply with Measure G?

Response to Comment PC152-6

Detailed engineering and design plans have not yet been submitted for City review and approval. The EIR analyzes the most intense scenario that could be developed under the proposed project, including the maximum building heights and intensity. The actual building design and heights would not exceed the heights and intensities identified in the EIR and required by the zoning code. Please see Response to Comment PC134-16 for discussion of the appropriate level of detail in an EIR. As described in Chapter 2, Project Description and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with the height requirements specified in the Coastal Zoning and other relevant land use planning documents. The specific height requirements for each area within the project site are identified in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards in Section 3.9, Land Use and Planning of the Draft EIR. Once design and engineering plans are submitted to the City for review, they would be reviewed further for compliance with development regulations specified in the Coastal Zoning and the EIR.

T.O.P. refers to “top of parapet” and represents the highest elevation of each structure. The comment refers to a “Measure G 45-foot height limit”, although as described in Table 3.9-8, the height limits vary throughout the site. Further, the measurement point varies throughout the site as are generally controlled by the definition under the City’s Municipal Code Section 10-5.402(a)(33), as noted on Draft EIR page 3.1-51. In the southern portion of the site, the maximum building in height is generally considered relative to the top deck of the existing Pier Parking Structure or Pier deck (the lower levels of parking are below the on-grade Pier Plaza level), while in the northern portion of the project site, the maximum building height is considered relative to the sidewalk grade of Harbor Drive. Additionally, pursuant to RBMC Section, 10-5.1522, several features can be above the permitted height limits pursuant to Design Review and approval, including mechanical equipment, steeples and bell towers, architectural design elements integral to the overall design character of a building (such as a finial, pinnacle, or weathervane), or flagpoles. The proposed parking structures would be required to comply with the maximum height requirements; however, the height of vehicles (i.e., on the top deck of parking structure) are not considered when determining regulatory compliance with the City’s code.

The current zoning approved through Measure G was adopted in 2005 – 2010 and therefore is not applicable to the Pier Plaza development. However, the Pier Plaza development is consistent with current height requirements of 30 feet above the sidewalk grade of the Pier Plaza development.

Comment PC152-7

The California Coastal Commission in a public hearing with the developer of PIER Plaza came to an agreement on the height of the buildings being built there.

What is the height of the DEIR proposed Harbor Drive parking lot? Does this parking lot have below grade parking levels like the Sheraton Hotel across the street?

Why does the CSP Fig. 2-8 not provide building heights for the 800' long "Hotel?"

Response to Comment PC152-7

As described in the Response to Comment PC152-6 above, the proposed project would be consistent with height requirements specified in the Coastal Zoning, as presented in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards in Section 3.9, Land Use and Planning of the Draft EIR. The parking structure on Harbor Drive in the northern portion of the project site would have a maximum height of 45 feet as measured from the sidewalk grade of Harbor Boulevard. The parking structure would be four levels. Due to the high groundwater table, the parking structure would not have below grade parking levels.

Similar to the existing Pier Plaza development, the maximum height for the boutique hotel would be 30 feet above the existing grade of the Pier Parking deck.

Comment PC152-8

Why does a 6,800 page, million dollar plus DEIR, paid for by the "developer," go to such extremes to hide the negative impacts of this Water Front Project?

Response to Comment PC152-8

The Draft EIR was prepared by the City of Redondo Beach, as Lead Agency for the project. Reimbursement by the Project Applicant for the costs associated with the preparation and processing of the EIR does not affect the objectivity, integrity, or legal adequacy of the document. The Draft EIR fully discloses the potential environmental impacts of the proposed project in accordance with the requirements of CEQA, including the identification of significant and unavoidable impacts. The comment does not indicate specifically what negative impacts were not disclosed in the Draft EIR; hence, no further response is possible.

Comment PC152-9

What would the grade level of the extended Pacific Avenue be relative to the existing adjacent Ocean Club and the Village Condominium residential buildings?

Response to Comment PC152-9

The Pacific Avenue Reconnection would be approximately 28 feet below the first floor residences of the adjacent Village/Seascape condominiums.

Comment PC152-10

Why does the DEIR find no significant health impacts to the residence living in the Ocean Club Apartments and the Village Condominiums from the extension of Pacific Avenue to Torrance Blvd.? None of these units nor do the Sea Scape's have air conditioning. All these residents are "Green" and dependent on the Ocean breeze for cooling. In the 40 year+ history of the Ocean Club and Village Condominiums there has never been vehicle traffic from Pacific Avenue there.

Response to Comment PC152-10

Section 3.2 of the Draft EIR disclosed significant construction related impacts associated with NOx and CO on Draft EIR page 3.2-41. The health effects associated with these pollutants were described in Table 3.2-1 of the Draft EIR. This methodology was recently upheld in *Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority* (2015) 241 Cal.App.4th 627, 667.

Comment PC152-11

Why not use an automated "Green" trolley system to accomplish an improved circulation system in the King Harbor/PIER complex instead of extending Pacific Avenue?

Response to Comment PC152-11

As noted, in Draft EIR Section 3.13.2.3.4 (in Section 3.13, Traffic and Transportation), the project site is well served by transit service under existing conditions, and providing a short distance trolley through the project site is not expected to affect transportation mode choice for the site's visitors (i.e. vehicle, bus, bike, or pedestrian access) or improve circulation beyond what is being proposed. Individuals who utilize the project are not expected to utilize vehicular transportation once they arrive at the project site; as also outlined in Draft EIR Section 2.4.1.5 in Chapter 2, Project Description and page 3.13-81 in Section 3.13, the project includes a number of pedestrian and bicycle facility improvements. Your suggestion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC152-12

Where will all of the delivery and trash trucks that come with this 500,000 SF development go? I could not find it in the DEIR.

Response to Comment PC152-12

Chapter 2, Project Description of the Draft EIR, describes the service and loading areas (including trash areas) associated with the proposed project. As shown on Figure 2-22 (on page 2-79 of the Draft EIR), designated service and loading areas would be located on the northern and southern portions of the site. On the northern portion of the site, service and loading areas would be located along the proposed parking structure within the project site. In the southern portion of the project site, there would be a service and loading area to the north of the new parking structure, adjacent to and serving the hotel and retail uses. The loading and service area would be accessed from Pacific Avenue and the area partially enclosed and screened from view. The traffic analysis (Section 3.13 of the Draft EIR) assumed traffic associated with delivery and service vehicles based on the proposed land use mix, and the noise section (Section 3.10 of the Draft EIR, including page 3.10-26) addressed the noise associated with service and loading areas and their location relative to noise sensitive receptors.

Comment PC152-13

Does the DEIR Figure 3.1-22 show "dark sky" lighting, that doesn't shine into residential apartments and condominiums adjacent to a proposed Pacific Avenue road connection to Torrance Blvd.?

Response to Comment PC152-13

As addressed under Impact AES-4 in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (beginning on page 3.1-66), the light source will be similar to what exists today and required by the City to illuminate the project site and be reflected away from adjacent residential premises and streets. Although the lighting would continue to contribute to the overall ambient glow of the area, light spillover from the project site would not be allowed to occur. Specific to the Pacific Avenue Reconnection, on page 3.1-68 of the Draft EIR street lighting along the Pacific Avenue Reconnection. would comply with City roadway lighting requirements (for safety). The new lighting would increase within this area; however, the project light sources would not spill over onto adjacent residential uses. In addition, because the roadway is below the adjacent residential uses to the east, no vehicle lights would be visible off-site.

Comment PC152-14

Why does this Water Front DEIR reduce the size of the existing recreational facilities?

Response to Comment PC152-14

As described beginning on page 3.12-17 of Section 3.12, Recreation of the Draft EIR, the proposed project would improve and expand recreational resources. This includes enhancement of biking and walking paths, implementing a boat launch ramp, renovating existing facilities, and providing high quality open space. Regarding Seaside Lagoon, see Master Response #4: Modifications to the Seaside Lagoon and regarding the number of slips in the Redondo Beach Marina/Basin 3, see Response to Comments PC323-33 and PC246-4.

Comment PC152-15

Why are the number of existing parking spaces for trailered boats being reduced by 30%?

Response to Comment PC152-15

Please refer to Master Response #7: Waterfront Parking.

Comment PC152-16

What visitor boat slips are available for Marina del Rey and Long Beach yachtsmen? I was not able to find them.

Response to Comment PC152-16

As shown on Figure 2-16 – Conceptual Marina Reconstruction Plans (on page 2-68 in Chapter 2, Project Description of the Draft EIR), there are side ties proposed for visitor/day boater use. In addition, as is currently the case, transient moorings will continue to be available inside the North (Outer) Breakwater. (See Figure 4-4 in Chapter 4, Analysis of Alternative of the Draft EIR for the exact location of the existing moorage area).

Comment PC152-17

Why is the existing "Sea Side Lagoon" being down sized by 50%?

Response to Comment PC152-17

Please refer to Master Response #4: Modifications to the Seaside Lagoon regarding modifications to the Seaside Lagoon.

Comment PC152-18

Why is the wooden "day" boat fishing pier with "Polly's" and the Bait Shop being eliminated?

Response to Comment PC152-18

Please refer to the Master Response #5: Sportfishing Pier, Polly’s and Sportfishing for information on the condition of the Sportfishing Pier and buildings.

Comment PC152-19

Why does the DEIR find no significant impact on recreational opportunities when boater's parking and the "kids" Lagoon are being down sized?

Response to Comment PC152-19

See Section 3.12.4 in Section 3.12, Recreation in the Draft EIR, which presents the methodology and the impact analysis for the recreation analysis in the Draft EIR. Additionally, see Master Response #4: Modifications to the Seaside Lagoon and Master Response #7: Waterfront Parking.

Comment PC152-20

It takes a real stretch of one's imagination to see how this project possibly adds any open space, recreational opportunities and keeps the existing "public" Ocean views.

Response to Comment PC152-20

As noted throughout the Draft EIR (particularly beginning on page 2.4.1.2 of Chapter 2, Project Description and beginning on page 3.12-17 Section 3.12, Recreation), the proposed project includes enhanced public open space including expanded boardwalk along the water’s edge and pedestrian and bicycle pathways. While overall the amount of open space within the site boundaries would remain similar to the existing conditions, the quality of the open space would be significantly enhanced by the addition of features such as new landscaping, lighting, benches, a decorative fountain and centrally located public gathering spaces. Further, the new open spaces are integrated into the overall site design to provide more useable and visually pleasing spaces promoting high quality design to enhance active and passive use and enjoyment of the outdoor environment by residents, visitors and families, and complement the natural beauty of the harbor and Santa Monica Bay.

As described in Section 3.12, Recreation of the Draft EIR, the proposed project would improve and expand recreational resources. This includes enhancement of biking and walking paths, implementing a boat launch ramp, renovating existing facilities, and providing high quality open space. Recreational enhancements also include opening the Seaside Lagoon to harbor waters, which would provide a number of benefits to the lagoons

operations, including but not limited to: (1) the proposed project would allow the lagoon to be open year round (rather than just over three months a year under existing conditions), (2) the proposed project would eliminate the physical fencing and barriers that separate the lagoon from the rest of the Harbor, (3) the lagoon would no longer require a fee to access the facility (as occurs under existing conditions), (4) individuals will be able to access the lagoon to launch paddle board and kayaks (which is not available under existing conditions), (5) the project will provide improved pedestrian and bicycle access to the lagoon, and (6) provide improved concession and accessory uses (such as recreational sales/rentals).

Regarding views along Harbor Drive, the baseline conditions are described on Draft EIR page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5) in Section 3.1, Aesthetics and Visual Resources of the Draft EIR. Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44 through 45. Please see Section 3.1 for more detailed discussion and illustrations of additional viewpoints.

Comment PC152-21

Why does the DEIR not account for the impact that the future development of the 50+ acre AES power plant site will have on Redondo Beach residence quality of life? The AES site development in the future could add another 12,000+ vehicle trips.

If the AES site design put a parking garage on the east side of Harbor Drive, it'd save priceless Ocean views on Harbor Drive.

Response to Comment PC152-21

Regarding the future of the AES project and cumulative impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis. Regarding the suggestion to relocate the parking garage to the east side of Harbor Drive, mitigation measures are not required for impacts, which were determined to be less than significant.

Comment PC152-22

Why does the DEIR find no significant impact from 12,500 additional daily vehicle trips generated by the Water Front Project? Did the DEIR conduct any of these traffic studies on a typical summer weekend?

Response to Comment PC152-22

Regarding general concerns regarding traffic associated with the proposed project, including information on

summer weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC152-23

How does rental office space and a movie theater on the Water Front enhance the "public's" experience of the beautiful California coastline and help keep these priceless Ocean views?

In reviewing this DEIR I was reminded that the California Coastal Commission guidelines basically state that the beauty and splendor of the California coast naturally exists, and is not enhanced by building more concrete structures at the beach.

Response to Comment PC152-23

Regarding the compatibility of the proposed office and theater uses, please see Master Response #3: Economic Vitality And Compatibility Of Businesses At The Project Site.

As discussed in Section 3.9.3.3.2 in Section 3.9, Land Use and Planning of the Draft EIR, Implementation of the California Coastal Act is accomplished through the City's certified Local Coastal Plan (LCP), which was reviewed and approved by the California Coastal Commission and the voters of Redondo Beach (Measure G), which included a development cap of 400,000 square feet (which was reduced from 750,000 square feet). As discussed in Section 3.9.4.3.2 in Section 3.9 (see Tables 3.9-5 through 3.9-8), the proposed project is consistent with the City's LCP and is thereby consistent with the California Coastal Act.

As also discussed in the April 8, 2008 Administrative Report prepared for the City Council public hearing on the zoning for the project site: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, p. 26.) As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher FARs [Floor Area Ratio] than auto-oriented centers… a low FAR may not achieve the character and amenities desired for the Harbor area, and too low a FAR is not likely to result in a pedestrian-active character."

The commenter also asks why office space and a hotel are proposed. As described in Section 2.1.1.5.11 (in Chapter 2, Project Description of the Draft EIR), the project includes a boutique hotel and movie theater. These uses are consistent with the uses allowed under the City's zoning (RBMC Sections 10-5.810 and 10-5.402(a)(50).) As also discussed in Chapter 2 of the Draft EIR, one of the project objectives is to reduce seasonality, by including facilities such as the movie theater ("commercial recreation") and hotels. As further discussed in the City Council's April 8, 2008 Administrative report for the project site's zoning, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors….If the Harbor area is to be revitalized as a year-round asset, the uses that will need to be focused on are hotels…"

COMMENT LETTER NO. PC153 STEVE COLLINS

Comment PC153-1

My family has been enjoying the little pier for decades. I take my 10 year old their to fish. I'd hate to see it go.

Response to Comment PC153-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC154 CHRISTOPHER KREIDEL

Comment PC154-1

Assuming you are bombarded by these, I kept this simple.

The reasons I am in favor of the Waterfront redevelopment presented by CenterCal:

- Show community support for the many business owners and boaters who are in favor of the redevelopment.
- Bring back the residents who have stopped visiting the pier because it has deteriorated over the years.
- Avoid further deterioration of the parking structure and pier due to age and severe weather.
- No reasonable alternative has been presented.

Response to Comment PC154-1

The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC155 DONNA CAPRARO

Comment PC155-1

I am a long time tax paying resident of the South Bay most recently 11 years in Redondo Beach. I love this community and I fully support the Waterfront Revitalization Project.

Our community needs this.

Response to Comment PC155-1

The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC156 TAYLOR WOLFSON ON BEHALF OF: JACK & SHANNA HALL

Comment PC156-1

We have recently moved to Redondo Beach and California not much before. Our decision was greatly based on access to the waterfront area and coastline via walking. No one is against "renovation" of existing facilities however when you start building and changing "right of ways", such as the proposed continuation of existing

streets, it begins to effect residents negatively. We came from one of the most well planned communities in south Florida (Pelican Bay in Naples), which prioritized "renovation" in the correct order 1-environment 2-residents 3-everything else! We ask that this be considered and that the addition of ANY new public streets be removed from the project.

Response to Comment PC156-1

The comment states a comment/opinion relevant to the project but does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC157 M. DENNIS DINNEEN

Comment PC157-1

Though I am a resident of Hermosa Beach I needed to offer my thoughts concerning the Redondo Beach Waterfront Development.

First let me say I am basicly in favor this very much needed development! Though I have questions concerning some of the numbers I have seen. Not being a resident of Redondo I am reluctant to enter into the fray but wish Redondo the best.

I'm told that part of the change in the project is to remove the Redondo Sports Fishing Pier. For forty five years I have been using the Redondo waterfront for running, walking, dinning, swimming, fishing, whale watching and much more. One of the major attractions to me has been the fishing pier where I took my kids to catch their first fish, where I took my kids and out of town visitors to whale watch, where we used day boats or were boated out to the old barge to fish. I've used Polly's for breakfast since it opened many years ago. So I have many fond memories of the fishing pier. I am not alone, in this message, when I say to remove that pier would be a great disservice to our community.

Response to Comment PC157-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comments are acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC158 ALICE MURPHY & BRANDON VILLALOBOS

Comment PC158-1

I very much would like a change at the Redondo Pier. I moved here 10 years ago from Boston and there, they do a lot to preserve their buildings and parks to allow walking around to be pleasant and stimulating. To me, preservation isn't just keeping things the same. It's about updating materials but keeping the same design/style for historical charm. At the pier, I feel preservation is lost. Even though some of the same businesses are there (which is great) they have not been maintained which makes the pier kind of depressing to walk along. The beach alongside the pier (to the left of Barney's) is constantly being trashed by the people who do a beach day there and the stores on the pier do not sell anything desirable. I like Tony's but the rest of it looks like fast food

and junk stores. So when people say they don't want retail at the beach, anything looks more desirable than the stores that are currently there. Although I'd prefer it be no retail at all and just restaurants, ice cream shops and recreation, I understand there may have to be some retail to help bring in people. It would be great if the retail is something like Riviera Village. So although I prefer the pier to be recreational/restaurant only, I'm all for the waterfront plan with a few exceptions (less dominant boutique hotel and less retail) But otherwise the plan looks great.

Response to Comment PC158-1

Please also see Response to Comment PC152-23 above for a discussion of the proposed boutique hotel. The comment states a comment/opinion relevant to the project but does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your opinions will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC159 SOUTHWEST ANGLERS, INC.

Comment PC159-1

We the members of Southwest Anglers (a local sportsman's club founded in 1938) are pleased and excited to hear the planners of the Redondo Harbor small craft boat launch are seeking public comment for this project. All of the active members (about forty-five of us) are year round ocean fishermen. Many are boaters with years of small craft experience. All of us agree that the boat launch ramp is needed here at Redondo Beach. Our other launch options are much further away and more inconvenient than Redondo's central location. Based on the seven boat launch options presented, we unanimously recommend the two lane ramp proposals for the following reasons.

1. Safety and easing congestion: Obviously two lanes can handle more traffic than a single lane. Fishermen tend to leave at the same time early in the morning and return to port at the same time later in the day, according to tide movements. A single lane launch ramp will result in slower launches and cause boats to stack up waiting to come in. Many boats idling in a crowded harbor affect all traffic in the harbor, not just at the ramp. This is a very real safety concern.

2. Parking: The two lane launch ramps have provision for forty parking spaces, double that of a single lane ramp. We consider this additional space necessary for what we think will be for current demand and more importantly, future needs. It should be noted that there are forty nine parking spaces for the two public boat hoists, an indication of earlier planning consideration. Unfortunately only one hoist is operational with size and weight limitations. It is also only open for a part of the day. Parking restricted to only twenty spaces will be a detriment making Redondo less attractive to use by the local boating community. Who will come if there isn't enough parking when it is needed? The result would be to discourage the public from ocean access through Redondo Beach Harbor.

3. Value: A two lane ramp offers better value for the extra cost of building two lanes instead of only one. It allows for more access and use of the harbor facilities and more potential revenue for local businesses. More use will hopefully encourage more interest in boating, boat ownership, and other recreational use of the area around Redondo Beach harbor. We want Redondo Beach to be the boaters' harbor of choice for use, prompting growth with more interest in fishing and boating in general.

Response to Comment PC159-1

The commenter states an opinion/preference relevant to the boat ramp alternative (one-lane versus two-lanes). Whichever ramp size (one or two) is chosen it will be designed and operated in accordance with the California State Parks Division of Boating and Waterways guidelines for safety. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding the proposed boat ramp. Please also see Draft EIR Section 3.13, Traffic and Transportation, Impact TRA-3, for a discussion of small craft boat traffic and safety. Please also see Draft EIR Section 3.13, Impact TRA-2 for discussion of parking. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC159-2

As for location, a two lane ramp at either Mole A, C, D would depend on traffic and tidal surge conditions. We did not see any analysis of this in the Draft EIR and would opt for the safest location provided it doesn't delay the project many more years.

Response to Comment PC159-2

Starting on page 4-295 of Chapter 4, Analysis of Alternatives of the Draft EIR, Alternative 8 – Alternative Small Craft Boat Launch Ramp Facilities With King Harbor analyzed six options to the proposed two-lane boat ramp within the project site. The analysis considered various one- and two-lane ramps at three possible mole locations (Mole A, Mole C and Mole D), which were identified as potential locations for a boat launch ramp facility based on navigational safety, site constraints (such as location of existing boat slips and other physical features), and other factors such as typical wave patterns and storm conditions. Figure 4-4 and Figures 4-5a through 4-5f (pages 4-297 through 4-304) of Chapter 4 shows the location of these alternative boat ramps sites.

Comment PC159-3

We hope our comments and recommendations, based on our boating experience and fishing in these local waters will help the planners in making the best decision.

Sincerely,

The members of Southwest Anglers *[List of signatures follows – refer to PDF in Volume II of the Final EIR]*

Response to Comment PC159-3

The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC160 STEVEN & KATHLEEN DAVIS

Comment PC160-1

Comments on Water Front Development Proposal

As a marina tenant at the Portofino Marina for the last 8 years, we have come to know and love the harbor and all its unique environments. We participate in sail boat racing, fishing, and cruises to Catalina Island. We bring friends and family down to the harbor and pier frequently and enjoy the many eating and drinking options

available. We have especially enjoyed some of the new establishments at the pier to include, King Harbor Brewing, the Slip, and the new Basque Restaurant. We also enjoy going over to Barney's Beanery for lunch or El Torito for taco Tuesday. In short, we enjoy and use the amenities available at the pier today and wish to see the laid back funkiness of the pier preserved.

The supporters of the water front project have described the pier as despicable and filthy and not a place that locals frequent. This is an unfair characterization and contrary to our own personal experience. Yes, there are areas of the pier that need maintenance and repair and yet, there are many days during the summer when the pier and adjacent beaches are filled to capacity with people. However, from the developer's perspective, these people are not the right people because number one, they don't spend much and because number two, they are not coming from the more affluent local community. This project is not catering to the causal beach goer but seeks to replace "freeloaders" with paying customers, i.e. it is all about the money and not about public access.

We are opposed to this project because it seeks to destroy the grimy and gritty with the sleek upscale homogenized corporate store fronts that we have everywhere else. We are opposed to this project because it destroys what is real and replaces it with phony. We are opposed to this project because it is too massive and will certainly result in increased traffic.

Response to Comment PC160-1

Please see Draft EIR Section 3.13.4.3 in Section 3.13, Traffic and Transportation for discussion of the Project's vehicular trip generation and traffic impacts. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC160-2

As far as the location for a new boat ramp goes, if the water front project does not go through, as we believe it should not, then there is no need to build a boat ramp. However, if the project does go through, then the boat ramp should be located somewhere within the foot print of the new development since that is the only area where we have a clean sheet. Every other proposed location would have significant impacts to other interest. Locating the boat ramp at mole A would displace the yacht club and locating the ramp at mole B would impact harbor patrol operations. Since the need for a boat ramp is being caused by the proposed water front development project, the developer should be required to fulfill this need rather than pushing the ramp into some other area of the harbor.

Response to Comment PC160-2

Please refer to Master Response #8: Boat Ramp in King Harbor regarding placement of the boat ramp within King Harbor. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC161 JESSICA IBARRA

Comment PC161-1

Please consider alternative #5 to keep businesses on the International Boardwalk until the end of their lease term.

Response to Comment PC161-1

It should be noted that Alternative 6 – Alternative Construction Phasing (see Chapter 4, Analysis of Alternatives in the Draft EIR) includes the potential to keep the businesses on the International Boardwalk until the end of their lease term. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC162 GRETA FIELSTRG

Comment PC162-1

I like this project very much!!!

Response to Comment PC162-1

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC163 DENYS ANDREW

Comment PC163-1

I'm wondering how you make money on the commercial shops proposed when many are now not doing well, we need people to come to Redondo Bch for what they come here for the ocean, scenery, wildlife, not to shop

Response to Comment PC163-1

As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC164 DAVID BRADY

Comment PC164-1

Regarding Boat Ramp

1. One lane ramp unsafe. Must have two lanes at least to function safely

2. EIA doesn't adequately discuss boat safety

3. South Turning Basin safest location

Response to Comment PC164-1

Please refer to Master Response #8: Boat Ramp in King Harbor for information regarding the proposed boat ramp, including safe operations. Beginning on page 3.13-80, under Impact TRA-3, small craft boat traffic safety is analyzed in Section 3.13, Traffic and Transportation of the Draft EIR. As detailed in the Draft EIR, development of the proposed small boat launch ramp and associated breakwater could pose a potentially significant safety hazard relative to boats at the launch ramp and personal recreational watercraft (e.g., paddle craft, kayaks, and peddle boats) to/from the nearby hand launch area operating in close proximity, being somewhat confined by the breakwater. With implementation of mitigation measure MM TRA-8 (Boat Launch Ramp/Personal Recreational Watercraft Interface Management), the safety hazard would be reduced to less than significant.

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC165 KEITH ARNOLD

Comment PC165-1

I thoroughly support the project but I did not speak

Response to Comment PC165-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC166 GLORIA ABERNATHY

Comment PC166-1

TOO BIG – TOO MUCH TRAFFIC

REVIVE + Reorganzie WHAT'S THERE!!!

Get better quality vendors + use small expansion blgs

NO THEATER!!! ←--- REDUNDANT

$$$ DON'T WANT MY EVER –INCREASING

TAXES TO INCREASE MORE ON THIS PROJECT

Response to Comment PC166-1

Please refer to various Master Responses, such as #9: Views and Scale of Development, #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, and #3: Economic Vitality and

Compatibility of Businesses at the Project Site, for information on size of the development, traffic, and the theater.

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC167 LISA YOUNGWORTH

Comment PC167-1

- Increased traffic concerns
- overdevelopment concerns
- boating/marina – "drawbridge" not feasible
- ocean quality concerns
- Boat ramps – lack of
- Too many buildings (views blocked) (too high)
- Harbor access concerns

Response to Comment PC167-1

Please refer to various Master Responses, such as #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, #9: Views and Scale of Development, and #8: Boat Ramp in King Harbor, for information on traffic, size and height of the development, and the boat ramp. Please also see Draft EIR Section 3.8 Impact HWQ-1 beginning on page 3.8-54 for an analysis of water quality and Section 3.1 Impact AES-1 beginning on page 3.1-37 for an analysis of view impacts. See Response to Comment PC323-96 regarding the pedestrian bridge and access to the Basin 3 marina.

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC168 BOYD BAKER

Comment PC168-1

I want some version of the waterfront plan to come to fruition.

Huge supporter of the current plan.

Response to Comment PC168-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC169 JIM JENKINS

Comment PC169-1

I believe there are some structures which would qualify as a historical landmark - Tonys?

Response to Comment PC169-1

Based on the project-specific historical resources investigation presented in Section 3.4, Cultural Resources of the Draft EIR, 208-210 Fisherman's Wharf (Tony's On The Pier and its companion building, Tony's Hats 'N Things) were identified as structures that meet the eligibility criteria for City of Redondo Beach Landmark designation (although there is no official designation). This being the case, the Draft EIR analysis considered Tony's a historical resource under CEQA. Because these properties qualify as historical resources as defined by CEQA, and may qualify for listing as a City of Redondo Beach Landmark, demolition of these buildings would represent a significant impact to historic resources under CEQA. While the EIR proposes mitigation measures MM CUL-1, MM CUL-2, and MM CUL-3, impacts to historical resources (such as 208-210 Fisherman's Wharf, as well as the Sportfishing Pier and buildings, and the Redondo Beach Pier Complex) would remain significant and unavoidable with implementation of the project.

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC170 ANONYMOUS

Comment PC170-1

Please do not build ramp at KHYC. I have been a member for over 30 years. The area is just too small for a ramp. Also the storm once in a while do make a mess. The best option look like by polys on the pier. Please do not build at KHYC.

Response to Comment PC170-1

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC171 BARBARA REILLY

Comment PC171-1

Keep pier parking structure (only rebuild it)

(no structure in front of Hotels)

Seaside Lagoon: no opening to polluted harbor water + sea animals

Swimming children in boat launch area (not good)

Too crowded in narrow part of harbor

Response to Comment PC171-1

As described in Section 2.4.1.3 and shown on Figure 2-15 in Chapter 2, Project Description of the Draft EIR, the Pier Parking Structure would be replaced with a new parking structure located east of the hotel.

Please see Master Response #4: Modifications to the Seaside Lagoon regarding water quality and sea lions. The commenter also states that there will be swimmers in the boat launch area; however, this is not expected. The proposed Seaside Lagoon creates a natural lagoon within the existing small breakwater to the south. While kayakers and paddle boarders are expected to leave the area within this breakwater to enter the main harbor, the use of the Seaside Lagoon by swimmers is anticipated to be similar to a wading beach, with recreational swimmers staying within the sheltered waters. Similar to other harbor beaches (such as the Kiddie Beach Park at Channel Islands Harbor in Ventura, Mother's Beach in Marina del Rey, and Mother's Beach in Dana Point) it is reasonably foreseeable that swimmers will not swim in the boat launch area or the main harbor. With the opening of the Seaside Lagoon, the modified breakwater associated with the lagoon would provide a sheltered swimming area that is larger than the current area. Longer distance (ocean) swimmers would be expected to leave from the County beaches to the south of the project site as there would be easier access to the open ocean from those beaches (i.e., no harbor traffic).

Beginning on page 3.13-80, under Impact TRA-3, small craft boat traffic safety is analyzed in Section 3.13, Traffic and Transportation of the Draft EIR. As detailed in the Draft EIR, development of the proposed small boat launch ramp and associated breakwater could pose a potentially significant safety hazard relative to boats at the launch ramp and personal recreational watercraft (e.g., paddle craft, kayaks, and peddle boats) to/from the nearby hand launch area operating in close proximity, being somewhat confined by the breakwater. With implementation of mitigation measure MM TRA-8 (Boat Launch Ramp/Personal Recreational Watercraft Interface Management), the safety hazard would be reduced to less than significant.

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC172 TOM JETT

Comment PC172-1

The EIR is accessed through a website with promotional presentations. For $300 million why not a simulation virtual drive along streets involved in & around project area before & after.

Response to Comment PC172-1

The comment does not address an environmental issue. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC173 RICHARD REILLY

Comment PC173-1

So I favor Alternative 2

RB needs to bite the Tax bullet to retain Existing character

The development approach will NOT be economically viable

Response to Comment PC173-1

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC174 NANCY & JEFF REDEL

Comment PC174-1

We are excited to see a revitalized waterfront w/more shops and restaurants. However, we did not see anything to address traffic concerns on NB PCH prior to the Anita/Hernando intersection. You address traffic on Herondo & Anita but the backup is always on PCH.

Consider making waterfront way a pedestrian only promenade.

Response to Comment PC174-1

The Section 3.13, Traffic and Transportation of the Draft EIR included an analysis of the PCH/Catalina Avenue and Anita Street/Herondo Street intersection (Study Intersection #7). The nature of the traffic analysis methodologies used in the analysis is such that the effects of traffic on all approaches to the intersection (including the northbound PCH approach) are considered in the level of service calculation.

The comment regarding making Waterfront Way a pedestrian only promenade is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC175 WALTER AREGGER

Comment PC175-1

1) HANDICAP PARKING (Tony's)

2) You ARE DOING "TOO MUCH AT ONE TIME!

3) WHERE WILL RUBY'S RESTRUANT GOING TO BE – WE USE IT WHEN WE ATTEND CHURCH EVERY SUNDAY

Response to Comment PC175-1

The project and parking structures will be designed and constructed in compliance with all building codes, including the 2010 California Building Code Section 1129B Accessible Parking Required, which governs the design requirements for accessible parking. The required number of accessible parking spaces will be provided per code, and accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shorted accessible route of travel to an accessible pedestrian entrance of the parking facility.

Please refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding existing businesses.

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC176 JAMES ECKLUND

Comment PC176-1

I reject the EIR's recommendation that Mole A is the Environmentally Superior location for the boat ramp. Access is difficult with 1600 feet to travel from Harbor Dr. There are 3 sharp turns and an s-curve to negotiate to reach Mole A. Also, because Mole A is land locked there is a limited amount of parkig stalls available. Mole A has space for no more than 30 boat trailers. Mole A is attached to the seawall that experiences annual flooding. 30 – 40 % of the boat traffic in The Marina passes mole A. The EIR is flawed as written and proves that a detailed study was not performed.

P.S. I hope the LA Times feels the same about a boat ramp on Mole A.

Response to Comment PC176-1

The commenter states an opinion/preference relevant to the boat ramp alternative location at Mole A. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A. As described in Section 4.6 (in Chapter 4, Analysis of Alternatives of the Draft EIR), the determination of the environmentally superior determination encompasses numerous resources areas, broader than those listed in the comment. The commenter has provided general information that does not introduce new environmental information or directly challenge the information presented in the Draft EIR.

COMMENT LETTER NO. PC177 ANONYMOUS

Comment PC177-1

COMMENTS

1. Please listen to the residents of Redondo Beach!
2. Keep the authencity and charm of the current businesses on the pier & the area
3. Redo the pier. Do not remove it.
4. Less concrete buildings like a tall office Building on old harbor & portifino
5. <u>Do Not</u> <u>take</u> <u>away the ocean views</u>!

   Building 3 stories on old harbor drive will take away the views east of old harbor drive
6. What is the environmental impact on traffic. I do not want to read the 6800 page report. Let the public know what this proposal will do to traffic.
7. We will need more than 20 spaces for boat launch parking Reducing the number to half of what we have now or reducing it at all is unacceptable.

Response to Comment PC177-1

Related to items 1 and 2, please refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding the Sportfishing Pier, as well as existing businesses.

As for item 3, we believe the commenter is referring to the Sportfishing Pier. Please refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding the Sportfishing Pier.

For items 4 and 5, please refer to Master Response #9: Views and Scale of Development, which contains details on the view analysis and results of the Draft EIR. Please also see Response to Comment PC134-11 above.

Regarding item 6 and general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Related to item 7, please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding the proposed small craft boat launch facility. The proposed project currently includes approximately 40 spaces at the boat launch ramp facility, not 20 referenced in the comment. (Draft EIR page 2-61.)

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC178 NO NAME - ANONYMOUS

Comment PC178-1

COMMENTS

NO office structure on Portofino & Harbor Keep Harbor open so all can see the ocean.

KEEP Building/businesses that give the Pier character – Captain Kidd's Polly's on the Pier are not concrete boxes.

CONCERN Hard to tell what thee story structures are going to block

Density – Yikes!

Traffic – Yikes!

Listen to Redondo residents. We are concerned about this project and how our lives will be changed by this project. NO MALL – TYPE CONSTRUCTION or FEEL is desired!!!!

Response to Comment PC178-1

Please refer to Master Response #9: Views and Scale of Development for details on the heights of structures and view analysis and results of the Draft EIR. Master Response #5: Sportfishing Pier, Polly's and Sportfishing contains information on existing businesses. Please also see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site).

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC178-2

Boating Commonts

Launch ramp –

Keep enough spaces for day boaters

Guests spots near main areas for day/hourly visitors is a must – like those in long Beach + now San Pedro

Response to Comment PC178-2

Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding the proposed small craft boat launch facility. As shown on Figure 2-16 – Conceptual Marina Reconstruction Plans (on page 2-68 in Chapter 2, Project Description of the Draft EIR), there are side ties proposed for visitor/day boater use.

The commenter states opinions and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC179 JAMES ECKLUND

Comment PC179-1

[Picture "Future site of RB Public Ramp/Fuel Dock … "ENVIRONMENTALLY SUPERIOR LOCATION"]
[Refer to Volume II of the Final EIR for the photo referenced]

Response to Comment PC179-1

Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A. Your comment on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC180 W. AREGGER

Comment PC180-1

THE PESTRAIAN BICYCLE BRIDGE IS UGLY – CANNOT NOT SEE OCEAN EASILY – TRY TO REDESIGN TO GET RID OF "V" STRUCTURE FOR BRIDGE

Response to Comment PC180-1

As shown in Figure 3.1-7 (page 3.1-43 of Section 3.1, Aesthetics and Visual Resources of the Draft EIR) the view of the ocean is not obstructed by the proposed pedestrian//bicycle bridge. Your opinion on the proposed

project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC181 NO NAME - ANONYMOUS

Comment PC181-1

Need to scale back. This will cause terrible traffic problems. Beautify existing areas.

Response to Comment PC181-1

Please see Draft EIR Section 3.13 for discussion of traffic and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC182 DIANE LIBERMAN

Comment PC182-1

The EIR has 6 Flaws re: Center Cal Plan

1) Traffic will increase over 12,000 cars per day

Response to Comment PC182-1

As detailed in Section 3.13, Traffic and Transportation of the Draft EIR the City disclosed that the project would result in a net increase of 12,550 vehicle trips. (See Draft EIR Table 3.13-11.) As summarized in Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, although the proposed project would generate additional vehicle trips to the area, the forecasted level of increase will be less than significant at all analysis locations after mitigation measures are implemented.

Comment PC182-2

2) Views: 45' tall structures will block 80% of views of Harbor on Harbor Drive (view from my House)

Response to Comment PC182-2

Please refer to Response to Comment PC134-11 and Master Response #9: Views and Scale of Development for details on the heights of structures and view analysis and results of the Draft EIR.

Comment PC182-3

3) Recreational: Reduced number of trailer spots and less access for boater and swimmers

Response to Comment PC182-3

Please refer to Master Response #7: Waterfront Parking and Master Response #8: Boat Ramp in King Harbor regarding parking for boating and swimmers.

Comment PC182-4

4) Noise: The increased traffic will increase the noise to all residents in South Redondo Beach and my neighborhood

Response to Comment PC182-4

Changes in roadway noise level that are projected to occur in conjunction with project-related traffic are addressed in Section 3.10, Noise of the Draft EIR; specifically, in the evaluation of Impact NOI-3 on pages 3.10-31 through 3.10-33 of the Draft EIR and the analysis of cumulative noise impacts on pages 3.10-38 and 3.10-39. As indicated on Tables 3.10-9 and 3.10-12 in that section, changes in roadway noise levels that are projected to occur due to project-related traffic would range from a decrease of 0.4 dB Community Noise Equivalent Level (CNEL) on Beryl Street east of Harbor Drive between the Project site and Catalina Avenue to an increase of 4.5 dB CNEL on Torrance Boulevard between the Project site and Catalina Avenue. Of the seven roadway segments evaluated, only the noise increase on Torrance Boulevard between the Project site and Catalina Avenue was found to be a significant and unavoidable impact. The changes in noise levels along the other six roadway segments were found to be less than significant.

Comment PC182-5

5) Water Quality: opening seaside Lagoon will increase e-coli /fecal pollution in the Harbor

Response to Comment PC182-5

Section 3.8, Hydrology and Water Quality of the Draft EIR details and analyzes the potential impacts of the proposed project on water quality. Please also see Master Response #4: Modifications to the Seaside Lagoon related to water quality and the Seaside Lagoon.

COMMENT LETTER NO. PC183 HAROLD DAVIDSON

Comment PC183-1

WHAT ADVANTAGE IS THIS PLAN TO RESIDENTS MOTHER NATURE AND THE INTERNET WILL MAKE THIS PLAN OBSOLETE IN TEN YEARS. YOU HAVE MANY SAFETY ISSUES WITH THIS NEW BYCYCLE PATH. TRAFFIC IS A NIGHTMARE DON’T PUT THAT RAMP ON MOLE A. IT’S A DANGEROUS AREA. (SEE ARMY CORP OF ENGINEERS REPORT AFTER 1988 STORM.) “THOSE WHO DO NOT STUDY HISTORY ARE DOOMED TO REPEAT IT. “

Response to Comment PC183-1

Please see Draft EIR Section 3.13, Traffic and Transportation, Impact TRA-3 for discussion of safety. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A. The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC184 ALLEN VICK

Comment PC184-1

I support this project because it is what all of Redondo Beach needs

Response to Comment PC184-1

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC185 YVONNE VICK

Comment PC185-1

ReParking Structure

Reconstruction Location itself is no reason to deny this project. The parking structure will be reconstructed because it's falling apart. The only alternative if we don't do the project in Center Cal is to do it ourselves w/ Government Bonds which we the residents must pay for.

Response to Comment PC185-1

Chapter 4, Analysis of Alternative, of the Draft EIR analyzed Alternative 2 – No Project – Necessary Infrastructure Improvements, which includes the demolition and reconstruction/replacement of the Pier Parking Structure along with other City infrastructure at the project site. The commenter is correct that if Alternative 2 were to be approved, the City would need to allocate funds for the infrastructure improvements. In fact, on January 19, 2016, discussions were heard before the City Council on the financing options for the waterfront infrastructure, which included using various funding sources and types, such as bonds and increase in taxes.

Comment PC185-2

Please consider any alternatives for location but location issue is not reason to cancel or deny project.

Response to Comment PC185-2

It is unclear as to the comment's meaning. However, as the subject matter is 'reParking Structure,' it appears that the commenter is requesting that an alternative location be considered for the parking structure. As detailed in Section 3.13.3.5 of Section 3.13, Traffic and Transportation of the Draft EIR, per RBMC Title 10, Chapter 5, Article 5. Parking Regulations (Section 10-5.1700 et seq), the City's parking regulations require a minimum amount of off-street parking be included at the project site based on the land uses. The proposed project includes the demolition and replacement of the Pier Parking Structure, which would be in a similar location to what exists today. Please see the Master Response #7: Waterfront Parking for reasons for the placement of the new/proposed parking structure in the northeastern corner of the project site. Moving the new/proposed parking structure to a different location at the project site would not reduce or avoid a significant environmental impact. The EIR analyzed a reasonable range of alternatives in Draft EIR Chapter 4, Analysis of Alternatives. However, the commenter's opinion is noted, and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC185-3

I am in favor of the project.

Response to Comment PC185-3

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC186 BRIAN HITTELMAN

Comment PC186-1

To Redondo Beach City Councilpersons and All Interested Parties: 1/9/16

I'm *very* concerned that our leaders are not thinking about real long-term planning for the future of the South Bay. Everyone knows that the entire waterfront area, which actually spans from PCH and Catalina to the Redondo Beach Pier, needs to be redeveloped, but the question is how to do it. What we do not need is a bunch of high end retail stores and a glitzy-looking promenade. Despite the lengthy and complicated planning process, the current plans are woefully inadequate and short-sighted.

We already have a model for the entire area- all you need to do is study some local history. 100 years ago Redondo Beach was a tourism and recreation mecca. Thousands of people visited regularly to enjoy all the different beach and aquatic activities, including sailing, swimming, surfing and fishing. I truly believe that it can happen again.

And on a related point, ours is the closest harbor to the West End of that beautiful and important tourist destination, Catalina. Twin Harbors is growing fast and someday more of the island will be developed. Shouldn't we be thinking about providing future transportation and commerce needs, and the potential boon to local economies that could bring? Or should we just leave that to San Pedro and Marina del Rey?

Los Angeles is one of the world's great coastal regions, but frankly people don't take enough advantage of our wonderful coastline. I've spent much of my life in Southern California working and fishing on boats, and I'm constantly amazed that with a population of *over* 15 million there are so few people who regularly enjoy the water. Imagine how successful this community could be with the right vision, infrastructure, and marketing strategy. Redondo Beach could truly become "the playground of the Pacific!"

In closing, let me leave you with this question: do you want credit for going back to the drawing board and getting it done right? Or do you just want credit for getting it done? I'm worried that I already know the answer.

p.s. In a letter published recently in the local paper on this very subject, I detailed my ambitious vision for the waterfront. It has something for everyone: a restored wetlands, a wave park, a kiddie swim area, fresh and saltwater pools (remember the Plunge?), sportfishing/sailing/paddling amenities, as well as commercial and residential property. With lots of fundraising and public/private partnerships, I hope and believe it can be done!

Response to Comment PC186-1

Please refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis as it related to overall planning efforts. As for the commenter's vision for the waterfront, the Draft EIR laid out specific objectives that the project or an alternative were compared against (refer to Section 2.2 in Chapter 2, Project Description of the Draft EIR). The proposed project is based on the applicant's vision of how to meet the project objectives. A Draft EIR provided a reasonable range of alternatives in Chapter 4, Analysis of Alternatives, which complies with CEQA. An EIR does not need to analyze every conceivable alternative or permutation thereof. (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.)

The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC187 ANONYMOUS

Comment PC187-1

AS A 40+ YEAR RESIDENT OF REDONDO, I OBJECT TO TRUNING REDONDO BEACH INTO ANOTHER GHOST TOWN – LIKE THE FAILED PROJECT ON TOP OF THE PARKING STRUCTURE.

WHEN I MOVED HERE, THERE WERE 3 MOVIE THEATERS IN THE MARINA AREA – ALL WENT OUT OF BUSINESS.

WE WILL BE STUCK WITH ANOTHER LOUSER [LIKE SAN PEDRO AND LONG BEACH] + MORE CONDOS FOR RECONDO BEACH

Response to Comment PC187-1

As for the projects ability to attract patrons and the movie theater, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC188 GREG & LYNN VAVREK

Comment PC188-1

1) Mole A is a small footprint
2) Mole A is the most exposed to the harsh environment
3) Requires a diligent maintenance regiment to maintain safe useability
4) Requires a proactive replacement schedule (planning ahead) because of the harsh environment
5) Opening Mole A to more public access increases the risks for personal injury lawsuits because of the location and that it is not the safest area.

Evident by this weeks weather, the ocean has easy access to that part of Mole A. Harsh and unsafe. How would the proposed fuel dock be protected from the 30ft waves crashing over the breakwater? Mole C or D is a lot more protected from the weather and the ocean.

If you are planning on closing the boat launch ramp during bad weather, are you going to make sure all the boats are back in safely?

The opening of the Harbor to the Ocean is the farthest away from Mole A, so the public boats launched have to go through all the traffic of: King Harbor Marina boats, Port Royal Marina boats, Portofino Marina boats, beginning sailers and all the sailing lessons that go on, the stand up paddlers, and the outriggers, and the transient moorings. All that traffic makes a very unsafe channel

Mole C or D has a lot quicker access to the Ocean. Public boaters want to get out to the ocean they do not come down here to go in the harbor.

Parking for the slips at King Harbor Marina would be more congested. A lot of the yacht club members with slips park in the clubs parking area. Will there be enough parking spaces for everyone?

The roads in the area of Mole A and on Mole A are very narrow and have tight turns. With the City just narrowing Harbor Drive by adding all the bicycle lanes, how do lots of boats on trailers get in and out safely.

Beryl is wide and straight already.

We have used large buses for events at the Club and they have a really hard time getting in and out on Yacht Club Way, Harbor Drive and 190th. 3 or 4 tries back and forth to get in and out.

Response to Comment PC188-1

Please refer to Master Response #8: Boat Ramp in King Harbor regarding placement of the boat ramp within King Harbor. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC189 GREG DIETE

Comment PC189-1

[*For the four photos included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR*]

City of Redondo Beach over the last 30 years has failed to maintain the PIER parking structure. The basic parking structure inside the structure looks okay.

The exterior facing the water shows signs of crumbling concrete could be saved with a "bond" issue. What structural engineer's determined the PIER parking structure needs to be razed and cannot be saved for much less money? Where do you find the structural analysis for the distinction of the PIER parking structure?

Response to Comment PC189-1

The Draft EIR appropriately discussed the status of the existing parking structures on page 2-29. A 2015 Conditions Assessment Update was prepared in January 2016 by Walker Restoration Consultants (the consultant/experts who performed an initial conditions assessment of both the Plaza and Pier Parking Structures in 2012). At the City Council meeting on January 19, 2016, the results showed that overall, the parking structures have continued to deteriorate compared to the findings reported in the 2012 Walker report. An

average increase of about 10 percent in the amount of deterioration repair has been observed. In addition to this, the costs of performing the repairs have increased about 15 percent since 2012 due to inflation and other construction factors. The updated Walker analysis looked at the expense of short-term and mid-term maintenance strategies, as well as full replacement of the Pier Parking Structure. Both the 2012 and 2015 Walker reports can be downloaded from the City's website: http://redondo.siretechnologies.com/sirepub/mtgviewer.aspx?meetid=474&doctype=AGENDA for the January 19, 2016 City Council agenda (Item N.3).

COMMENT LETTER NO. PC190 JEFF SALLEE

Comment PC190-1

I support the waterfront development. It is urgently needed and a legal responsibility.

Response to Comment PC190-1

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC191 RENE SCRIBE

Comment PC191-1

THE DRAFT EIR HAS NOT ADEQUATELY ADDRESSED THE FOLLOWING PROBLEMS WITH A MOLE A BOAT RAMP PROPOSAL**:**

1. TRAFFIC AT INTERSERCTIONS OF HARBOR DRIVE, YACHT CLUB WAY, HERONDO STR & BIKE PATH WOULD CREATE A VERY DANGEROUS CONDITION FOR BOAT & TRAILERS AND THE PUBLIC.
2. THE ACCESS ROAD TO THE PROPOSED "A" RAMP IS TOO NARROW, HAS A RIGHT HAND TURN VIRTUALLY IMPOSSIBLE FOR A CAR TOWING A DOUBLE AXLE TRAILER. I AM A BOAT OWNER WITH 50 YEARS TOWING EXPERIENCE (& COAST GUARD SEAMANSHIP CERTIFICATION)
3. THE PARKING & TRAILER PARKING AND TURNING RADIUS AT THIS LOCATION WOULD BE LIMITED AND DIFFICOLT.
4. THE PEDESTAIAN BEACH TRAFFIC TO THE BEACH BETWEEN THE ROAD AND THE HARBOR COVE APARTMENT BY THE PUBLIC SHOWER IS HEAVY AND YOUNG CHILDREN RUN ACROSS THE ROAD AND THE BLIND CORNER OF THE ADJACENT SEA WALL.
5. IN CONCLUSION, OF THE 4 POSSIBLE PUBLIC RAMP LOCATIONS THIS IS UNQUESTIONABLE THE WORSE. THESE FACTS ARE NOT OR INSUFFICIENTLY ADDRESSED IN THE EIR
6. AS A 50 YEARS RESIDENT OF SOUTH REDONDO AND USER OF THE HARBOR FACILITIES I HAVE WITNESSED THE FREQUENT CLOSURE OF THE MOLE A ROAD DUE TO THE WEATHER ELEMENTS AS IT IS THE MOST EXPOSED SIZE IN THE HARBOR

Response to Comment PC191-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A (See Chapter 4, Analysis of Alternatives - Alternative 8 of the Draft EIR.) The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a

through 4-5c, the Alternative 8 – Mole A options include a 60 foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. The commenter states an opinion/preference relevant to the boat ramp alternative location at Mole A. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A, including parking availability and surge. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC192 VIRGINIA GONZALEZ

Comment PC192-1

Likes: - Community outreach
- Pedestrian bridges, bicycles access
- Area for farmers market

Dislikes: - Lack of (Real Honest) traffic Study

- Lack of concern for the neighbor's in the community

PARKING? Will you charge? How much? This will impact the neighborhood
- Structures are too high
- Redondo – is a "beach" community – beach sand, watersports, fishing, SUP – water sports.

Response to Comment PC192-1

A detailed traffic study and analysis was performed for this project. Please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for a summary of the traffic results. For more detailed information, please read Section 3.13, Traffic and Transportation, and Appendix L1 of the Draft EIR.

Please see Section 3.13 of the Draft EIR for discussion of parking. As is currently the case at the project site, there would be a charge for parking. For additional details please refer to the Master Response #7: Waterfront Parking regarding parking. Refer to Master Response #9: Views and Scale of Development regarding the scale of development.

The proposed project analyzed in the Draft EIR (see Chapter 2, Project Description for details on the project elements) include enhancements to recreational opportunities at the site (e.g., small craft boat launch facility, opening of Seaside Lagoon year round and to tidal influence, etc.), which would continue the use of the project site for beach sand, watersport, fishing, and SUP use.

The commenter also asserts that "structures are too high." The commenter's opinion is noted. As described in Chapter 2 and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with the height requirements specified in the Coastal Zoning and other relevant land use planning documents. The specific height requirements for each area within the project site are identified in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards in Section 3.9, Land Use and Planning of the Draft EIR. Once design and engineering plans are submitted to the City for review, they would be reviewed for compliance with development regulations specified in the Coastal Zoning and the EIR. In addition, please see Draft EIR Section 3.1 for analysis of aesthetic impacts.

The comment does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC192-2

Suggestions:

Take a look at what mistakes have been made by city rushing – since the late 60's – 70's: Esplanade ruined w/multiple hi-rise condo's – and no infrastructure added to these projects

Fast track to all the major projects in the City of RB

We need more infrastructure

We see promises, we see that each major project "will" add – or widen streets. But this has not been carefully monitored.

i.e.: PCH @ Torrance Blvd, (1993) 1900 PCH Project was to add a lane from project to PVBVD

- Please add traffic lanes, Please add "park spaces" in and around these major projects.

- Please consider the residents

- Please don't add too high, too dense at our gorgeous Beach. Who are we: The Portofino, boat launches, surfing SUP fishing, long walks, bikes, skate – NOT 2-3 Story SHOPS!!

Response to Comment PC192-2

The proposed project includes infrastructure improvements (e.g., replacement of an old and damaged Pier Parking Structure and non-building code compliant buildings, grading to address future sea level rise, etc.) at the project site, including the Pacific Avenue Reconnection (which would reestablish the roadway connection along the waterfront). Please refer to Response to Comment PC192-1 above regarding other comments.

The commenter suggests widening streets. Please see Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, for discussion of traffic impacts and the proposed traffic mitigation measures. Traffic impacts would be reduced to less than significant with implementation of mitigation measures. Consequently, additional mitigation measures are not needed. (CEQA Guidelines § 15126.4(a)(3) ["mitigation measures are not required for effects which are not found to be significant."].) The comment does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC193 DOTTIE LEE

Comment PC193-1

1) I'm one of the residents who feel <u>parts of your project won't work</u> & will be a mistake – financially, aesthetically, emotionally.

2) I saw how adding buildings atop the present parking structure was pushed, only to watch as the project did NOT attract lots of restaurants & tourist sites, an expensive error.

3) Parking Lot. The present parking structure does need replacing. I don't like the position of the new parking structure, but my biggest concern is for handicapped people. My friend, who I drive to Kincaid's, has COPD after eating, she cannot walk far as much of what little oxygen she does have is being used for digestion. What is the city developer going to do to help out handicapped people?

Response to Comment PC193-1

Regarding the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

The project and parking structures will be designed and constructed in compliance with all building codes, including the California Building Code (Title 24 California Code of Regulations.) Section 1129B Accessible Parking Required, which governs the design requirements for accessible parking. The required number of accessible parking spaces will be provided per code, and accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In parking facilities that do not serve a particular building, accessible parking shall be located on the shorted accessible route of travel to an accessible pedestrian entrance of the parking facility. Please see Draft EIR Section 3.1 for analysis of aesthetic impacts.

The comment does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC193-2

4) Polly's. Polly's does more than the new structures will: it takes advantage of the waterfront location. My now-deceased husband + I, our friends, + our out of town relatives + friends love Polly's: relaxing in the warm sun with the sound of the waves lapping on nearby rocks: watching the sun sparkle on the water, seeing the peninsula + a bit of Catalina, watching the meriad types of boats from sail + power boats to peddle boats float by; seeing the tourist fishing boat return + fishermen with their catch walk down the pier, watching adults + children fish from the pier + great +night herons, pelicans + seagulls up close standing on the rail – a free show much better than one in a fancy theater + hotel that I probably will never be able to afford or inside a cement building.

Response to Comment PC193-2

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC193-3

5) Lagoon. Beyond hating to see a wonderful place for children disappear, it's obvious a small, open beach in that location is a big mistake. That beach will become a wildlife sanctuary + trashy. Last week, walking in the sun by the area, I saw sea lions nearby – on a buoy, basking in the sun in the water, + crowded onto a float. You open up that beach, and the sea lions will move there. Once there, being wildlife, they'll be illegal to move

out. There goes the beach for swimming + children. Furthermore, oil from launching boats there + from boats under power on their way from the harbor to the ocean will make its way to the beach. After stormy surf, the bird poop from the seawall rocks will wash ashore to the beach.

Response to Comment PC193-3

Master Response #4: Modifications to the Seaside Lagoon. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC193-4

6) Sports Fishing Pier. In one drawing in the EIR, the S. section of the present pier, now used for fishermen, isn't included. Does that mean the section will be deleted or that it will remain as it is + not be included in the project? It would be CRAZY to have a waterfront area + no fishing!

Response to Comment PC193-4

As described in Table 2-2 on page 2-43 in Chapter 2, Project Description, the Draft EIR analysis of the proposed project includes two project element options associated with the Sportfishing Pier: removal or removal/replacement. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. Even if the Sportfishing Pier is not replaced, pier fishing would continue to be available from a portion of the Horseshoe Pier and the adjacent Monstad Pier (immediately adjacent to the project site). Therefore, fishing opportunities would continue to be available under the proposed project. The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC193-5

7) Drawings. From the beginning I thought the developer was asking the city to accept a huge project without pictures of what it would look like – just arial drawings of circles + squares. The few drawings that finally came when EIR meetings began lately I found hard to see. A waterfront needs restaurants with big windows or other unencumbered views of the water, part of what makes Polly's, Kinkaid's, Tony's, + Joe's Crab Shack nice venues.

Response to Comment PC193-5

Detailed engineering and design plans have not yet been submitted for City review and approval. The EIR analyzes the most intense scenario that could be developed under the proposed project, including the maximum building heights and intensity. However, Figure 2-8 in Chapter 2, Project Description of the Draft EIR discloses the maximum heights of the individual structures (or range of heights for multi-story structures). The actual building design and heights could vary, but may not exceed the heights and intensities identified in the EIR and required by the zoning code. However, as described in Chapter 2 and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project would comply with the height requirements specified in the Coastal Zoning and other relevant land use planning documents. The specific height requirements for each area within the project site are identified in Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards in Section 3.9, Land Use and Planning of the Draft EIR. Once design and engineering plans are submitted to the City for review, they

would be reviewed for compliance with development regulations specified in the Coastal Zoning and the EIR. As noted under CEQA Guidelines Section 15124 "the description of the project...should not supply extensive detail beyond that needed for evaluation and review of the environmental impacts. The Draft EIR included numerous figures and qualitative/quantitative descriptions of the project. (E.g. Draft EIR Chapter 2 and 3.1.) (See also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.]; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [In the Bowman case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant "…even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense."]

Nevertheless, the commenters suggestions related to final design will be forwarded to the decision makers as part of the Final EIR for their consideration.

Comment PC193-6

8) Congestion. With only one lane each direction now on Harbor Dr., won't there be traffic problems?

Response to Comment PC193-6

The traffic analysis in the Draft EIR (Section 3.13 and Appendix L1) assumed the appropriate existing conditions associated with the adjacent roadways. The Pacific Avenue Reconnection would be a one-lane in each direction, which is appropriate for connecting with Harbor Drive adjacent to the project site. While Section 3.13 determined there would be some traffic related impacts, these impacts would be reduced to less than significant with the proposed mitigation measures. Please see Draft EIR Section 3.13 for additional details. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC194 LAURA D. ZAHN

Comment PC194-1

WATERFRONT DEVELOPMENT
OR
WATERFRONT DESTRUCTION
10 DEMANDMENTS

> NO 3-Three story 1.43 Acre Parking Structure
> NO Reduction/Relocation of Seaside Lagoon
> NO "Boutique" Hotel
> NO Vehicle Through-Way
> NO Pedestrian Draw-Bridge
> NO Loss of Boat Slips
> NO Loss of Boat Trailer Parking
> NO Movie Theater
> NO 2-Football Field Sized "Open-air Markets"
> NO City Funding to Remove Existing Parking Structure

Let's ALL Remember...Redondo Beach's City Moto is

MORE TO SEA NOT MORE TO SHOP!

The Back-Story for any development project is that...City Officials/Staff *want and need* their name on a PLAQUE..They *want and need* their name on a PROJECT. Doing so UP-VALUES their reputation and improves their resume! THEY want to Leave-a-Legacy BECAUSE they can and will LEAVE this CITY...LEAVING US with THEIR development projects (good or bad).

Residents just want to Live-a-Life!

WE can beat them at their own game! WE the residents of Redondo Beach can and MUST say NO!
WE can LIVE our own LEGACY.....
WE can SAVE OUR SEA S O S

You can tell all you need to about a society...From how it treats animals and beaches (Joan Unico 1986)
Information: Contact Laura D. Zahn (born and raised in Redondo Beach) myhomecastle@yahoo.com

BY "LIVING -A- LEGACY" WE CAN:

SAY YES TO...RIGHTSIZED DEVELOPMENT AND IN SO DOING...

./ YES! Live with more OPEN SPACE along our waterfront

./ YES! Reduce the CARBON FOOTPRINT of concrete, cars, congestion

./ YES! Offer more WATERSPORTS activities with easy access

./ YES! Keep our EXISTING boat slips and boat trailer parking
./ YES! Keep more small, INDEPENDENT stores and shops in town

./ YES! Keep the Saltwater lagoon AFFORDABLE for EVERYONE to enjoy

./ YES! Offer space for MORE Festivals/Fairs/ Food Trucks

(which offer goods and food for far less than a brick-and-mortar store besides EVERYONE young and old enjoys Festivals/Fairs/Food Trucks)

./ YES! Not INDEBT ourselves to the *whims* and *wishes* of:

DEVELOPERS, TOURISTS, or Shopping TRENDS (i.e. instore vs. ON-LINE)

./ YES! Keep our City Officials/Staff RESPONSIBLE to US not Tourists/Developers
./ YES! Keep our SEA; Simple, Sporty, Safe and most of all SEEN

The city short changed the residents of Redondo Beach by not utilizing the funds collected from the existing parking structure to maintain the structure, letting it fall into decay and disrepair. Yes, there were logistic issues with the design and layout, but that structure served the city well for decades. It also did NOT block any views. NOW the city wants to spend $20,000,000 + of tax payer money to tear down that structure SO... CenterCal can build a taller and bigger structure. IF...the city can come up with $20,000,000 +to demolish the structure why can't the structure be repaired and or remodeled. They wasted our money, AND they wasted our time by not making

improvements a decade or so ago. HOLD them accountable. DO NOT let them shirk their responsibility by handing CenterCal free reign on our SEA.
TO QUOTE Margaret Mead...

"Never doubt that a small group of thoughtful, committed citizens can change the world, indeed, it's the only thing that ever has"

Response to Comment PC194-1

The commenter has provided general comments that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC 195 BOYD BAKER

Comment PC195-1

Don't wish to speak – but I support the project – Please announce this

Response to Comment PC195-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC196 CHRISTOPHER S. BRINK

Comment PC196-1

I would also like to read this statement today.

[3 page written/typed comment letter attached]

Thomas Jefferson said the following, and I believe it to be particularly appropriate in this situation..

"The opinions and beliefs of men...follow involuntarily the evidence proposed to their minds."

And so here now I attempt to shape six thousand pages of information, which all say "Let's do this development!", with my 600 or so words.

My name is Chris Brink, I am a resident of Redondo Beach, and have lived here with my family for 7 years.

In order to provide some perspective on my comments I would like to start by saying I have been an senior executive in both the building and materials industries for over 10 years, I have managed businesses ranging from 80 million over a quarter billion dollars.

I believe in free markets and the idea of improving communities through and along with the development of strong local economies and businesses.

I have also lived in many cities, starting with Chicago, probably one of the best examples of urban land use and planning in the country. I have seen this done well, and I have seen it done poorly, such as when I lived in

Toronto, where poor land use and planning resulted in completely amputating the lakeshore from the city center, a problem that has now persisted for 3 decades and has no resolution in sight.

As someone who came to the Southbay with fresh eyes in 2008, I have always been amazed by what seems to have been an egregious lack of forethought in the use of our irreplaceable shoreline . Waste treatment, refineries, and of course power plants, littering a coast that any sane human being should have, when they first laid eyes upon it, treated with reverence.

But the only thing we can do regarding the sins of the past is refuse to repeat them, I commend the ambition in this project, because I believe that desire is the intent of its architects.

Developments that avail themselves of the use of public land or rare property that should be under eminent domain should aspire to be congruent not only aesthetically, but with the nature of the community.

Continuity takes many forms, architectural choices that capture or enhance the feeling of the incumbent architecture and history of the area, it should also mean a skyline and overall plan that allows the public to enjoy the ocean, the sky, and the mountains and hills that surround the Southbay.

Continuity means preserving, or even better, fostering the wildlife that chooses to live among us.. who among us hasn't “reset" ourselves at the sight of a grey whale along the coast, or smiled at the antics of the sea lions in the harbor (even though they are not always the most thoughtful neighbors) .. these are, indeed, some of our best ambassadors!

Continuity means fostering and promoting the fruition of the local businesses that have organically become dear parts of the community. From Old Tony's to Captain Kids, these are places that the locals cherish .. and they have been joined in recent years by new business, in the international board walk, like A Basque Kitchen and the Paddle house.. these entrepreneurs are the original investors in our boardwalk and shoreline .. and their business need to grow both during and after a development like this.

The first 6000 pages, and the work they embody, are a great step .. they all say "we won't disrupt these things!" .. But now I challenge you all to go the next step, and provide that we make this project harmonius with them.

Architecture can be made to be harmonious, unobtrusive, and congruent with the environments around it. Daniel Burnham, the original city planner of Chicago, said "Let your watchword be order and your beacon be beauty" ... and while there may be many many opinions on architectural beauty, nobody in this room will argue that the natural beauty of the ocean and the surrounding area needs to be promoted and preserved.. in fact, that's the entire reason Cenertcal has made this investment so far, and done so much (admirable) work ....They inherently recognize it and are working actively to repackage and monetize our irreplaceable natural resources. We should commend that energy and vision, as long as CenetrCal and the city government are willing to allow it to be thoughtful.. and with as much consensus as can be achieved, and be able to look back and say they have striven for continuity at every step.

CenterCal Needs to do this, because they need this project to be long term viable .. so, speaking from experience in making projects economically viable, I would like to make a few final points.

The South bay is surrounded by the carcasses of two large shopping malls, which would by no means be considered highly viable or successful.. these should be looked at as a cautionary tale .. Likewise, CenterCal's economic projections are aggressive, not unreasonably, but they will need to clear a very high bar in order to be successful.. We as a community need to help them by letting them know what we will respond to as a marketplace.

We should be both prudent in how aggressively we (I now say, "we") undertake this project, and we also need to approach it without ego.. we need to listen to what the market has already told us.... the people who live here look for unique stores, they prefer to give business to local business owners, they seek authenticity, and above all they respond to taste... the economy is here.. there is a reason why we can support a half dozen surf shops and yet a Claire's Boutique or a Forever 21 struggles in a soulless shopping mall.. a reason why Catalina Coffee is packed and Starbucks, while it gets its share, is not where everyone gathers on a Sunday.

Preserve this!

I have reviewed some of the project proposal, and am not overly familiar with the way a project, if finally approved, will be managed, it's impossible to do so.. 6000 pages..too much for any one citizen to really process.

But I would ask, actually, as a voter, I demand, the city consider the following three things:

1 That the project allow for local oversight and review for aesthetic and architectural significance and continuity .. that the public opinion be <u>included in and allowed to shape</u> the most significant project that will happen in the next 50 years in their community, and take the ocean away from all of us for the next two years of our lives.
2 That the development give favorable treatment to local businesses, locally owned and which are not national franchises or cookie cutter duplicates of the same box retail we have seen sprout up in every sad suburb from Jacksonville to Phoenix.
3 Finally, that the project be phased in such a way that the project allows the area to still be usable, viable, and ideally, reinvigorated step by step, raising the economic tide to lift all boats, as each element of the project is completed.

In other words, I ask that you consider and provide for a project that embodies continuity in all of its forms.

Getting to the "how".. I think it's in the power of the city council and I encourage us to take the best steps possible to insure those things .. create a land use committee with a broad enough constituency of people who can prove no direct financial interest in the project ... Public commentary without action is nothing.

Counterbalance this with a business development committee that are comprised of existing business owners and committed investors, all of whom have already made or about to make a stake in this and the surrounding area ..

Tie them together with the wisdom of the city council, and make sure that what we will build will endure and thrive.

Give the sky and oceans and wildlife back to our community in a place where we can live and work AND play.. who can argue with that vision? Who can argue with cooperation? We all want a better Redondo.

Response to Comment PC196-1

The commenters request the City to consider aesthetics and architectural continuity, as noted in Chapter 1, Introduction of the Draft EIR (Table 1-1), the proposed project must go before the City's Harbor Commission associated with the Design Review process (RBMC Sections 10-5.2502)(e) and 10-5.2512), which includes consideration of aesthetics appropriate for the project site. In addition to the public comment period provided for the CEQA process, these design review hearings also provide an additional opportunity for public input. However, to the extent that the commenter is suggesting delegating the City's administrative authority to members of the public, this is not permissible. Approval of the project

includes certification of the EIR and issuance of permits by the City's decision-making body. (CEQA Guidelines Section 15090(a)(2); see also Redondo Beach Municipal Code Section 10-5.2512(e) and (f).)

Refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on existing businesses.

Refer to Chapter 4, Analysis of Alternatives of the Draft EIR, Alternative 6 - Alternative Construction Phasing, regarding the impacts associated with phasing the proposed project. As also noted in Draft EIR Section 2.5.1, during construction, access during business hours would be maintained for Kincaid's and the adjacent Monstad Pier. The comments do not address an environmental issue. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC197 REGGIE THOMAS

Comment PC197-1

I support the redevelopment of the pier

I have to leave by 1030

Response to Comment PC197-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC198 MICKEY TURNER

Comment PC198-1

Being a Realtor selling on the Esplanade for the past 36 years, I am thrilled at the proposal to finally make our waterfront a positive addition to Redondo Beach. For years I have not been able to point to the Pier as a selling point, rather than a negative obstacle. What a world of difference this will mean for our wonderful City! I fully support this project!

Response to Comment PC198-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC199 YVONNE VICK

Comment PC199-1

Comments: I support the project!

Subject: Parking Structure

The location of the parking structure was disappointing to the Redondo Beach Hotel. I would consider moving or modifying the parking structure(s), but not at the price of denying the project.

Response to Comment PC199-1

The comment does not address an environmental issue. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

As discussed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, while views on Harbor Drive would be reduced due to the proposed parking structure(s), as well as other new buildings, the impacts would be less than significant. Regarding the commenter's suggestion to move or modify the parking structures, the Draft EIR analyzed a reasonable range of alternatives. The commenter does not provide a sufficient basis for showing that the impacts to these areas are greater than presented in the Draft EIR, thereby warranting an alternative that would reduce such less than significant impacts. In addition, the Draft EIR is not required to analyze every potential alternative. (CEQA Guidelines Section 15126.6(a) ["an EIR need not consider every conceivable alternative to a project."]; *Village Laguna of Laguna Beach Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.) Nevertheless, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC200 ALLEN VICK

Comment PC200-1

I attended the last DEIR meeting today and a large issue seems to be the new parking structure. I have to admit it is massive. Since the success of this project will be many compromises, I had a thought. If the city would provide a variance to Center Cal to:

1. Add an additional level to the pier parking structure when it is rebuilt. (386 new stalls)
2. Convert the third level of Plaza pier parking to parking and add an additional level for pedestrians and access to Czuleger Park. (166 new stalls)
3 Leave ground level stalls at proposed new garage location. (252 new stalls)
4 This provides approximately 804 new parking stalls which exceeds the proposed new parking structure stalls of 757 stalls. This is an estimate but I am sure an engineer can make it work if the city would provide a variance on height.

This would eliminate the view blockage for the two hotels which generate revenue for the city and stills provides parking from both ends of the development. The view from the pedestrian area would be much better because of the elevation. The view from Harbor Dr. would be less obstructed. It may partially block some views from the Condos behind the parking lot but that would be a minimal compromise.

Even if this is not an option I still support the project going forward.

Response to Comment PC200-1

Regarding the commenters suggested alternative, the purpose of the CEQA alternatives analysis is to provide alternatives, which reduce or avoid significant impacts. The Draft EIR determined that aesthetic impacts would be less than significant. Please also see Response to Comment PC150-2 for discussion of views along Harbor Drive. Regarding the commenter's suggestion to move or modify the parking structures, refer to Response to Comment PC199-1 above. Nevertheless, your comment (including recommended project modifications) will be included in the Final EIR for consideration by the decision-making body. In addition, the commenter states an opinion/preference relevant to the project approval. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC201 ALLEN VICK

Comment PC201-1

I want to congratulate the Redondo Beach City Staff on the detailed comprehensive Harbor Revitalization DEIR. They have made it interesting, easy to read and the numbers all match, especially when you break them down then add them back up. This is not the case in many documents this size. The size of this document may scare many people off but anyone who intends to engage in debate on this project needs to read chapter 2 and chapter 4. Chapter 2 is the project description, which includes the history of the harbor area and how we got to where we are today. Chapter 4 is the comparison of the alternatives. These two are a must read so you do not embarrass yourself in front of your neighbors by making a statement that is not true or is taken out of context. Sound bites won't work

Did you know that the harbor used to be a resort destination with a Pavilion with shops, theater, restaurants and dance hall? It also had a saltwater plunge pool. Prior to 1960 Pacific Avenue connecter along the harbor to Torrance circle. Development after 1960 removed this connection forcing traffic to Catalina Avenue to get to Torrance Boulevard and the south side of the project. Talk about a view killer. There is no view on Catalina Avenue because of all the condos that are blocking it. The new project will correct past development errors by bringing back the Pacific Avenue connection.

I have heard comments that the development on the north side of the project will block views when driving down Harbor Drive. I don't know about anyone else but all I see when I drive down Harbor Drive is asphalt parking lots. I don't see anyone sitting out in the parking lots having a cup of coffee with friends in the morning or a glass of wine in the evening. I don't see any families with their children playing in parketts. Wouldn't it be nicer to drive down Harbor Drive this time of year and see Christmas lighting or walk down the boardwalk with a cup of hot coco and look out over the ocean and PV? Maybe even hear some Christmas music. There are 7.8 acres of surface parking. This is a terrible way to use some of the most valuable land in the South Bay. The proposed new 45' parking structure only has a foot print of 1.48 acres freeing up 6.32 acres for new development, open space, pedestrian walks, bike trails, 40 double boat parking spots and 109 surface parking spots. Some people are concerned about the 45' height but that is the same height allowed for single-family dwellings.

Some people are worried about reducing the boat parking from the current 67 to 40. If you read the study quoted in the DEIR on pg 2.21 from 2012 to 2014, you will see that the maximum number of boat launches per year was 1225 during the 5 busiest months of May thru September. If you assume worst case that all launches occur on weekends, this gives you 40 days, which averages out to 31 spots per day. The 40 spots planned sufficiently covers the parking need.

There is a rumor that we will loose the fishing pier. This pier was built in 1969 and is experiencing significant deterioration as described in DEIR pg. 2.19. It needs to be torn down and rebuilt. The project proposal for its restoration can be found in DEIR pg. 2.89. It does not say it will not be replaced.

There is concern that the drawbridge will slow traffic flow in the marina. The bridge will be opened for sailboats and large powerboats. Having been a sailboat owner I could never be in a hurry and I would not mind the delay if I knew I could walk across that bridge instead of walking around the marina as we do today.

If you're confused by all the numbers being thrown around; 511,460sf; 523,939sf; 290,297sf; 304,058sf; review the charts in the DEIR on pg. 2.42 thru 2.47 to really understand the numbers and why they satisfy the Measure G voter approved limitation.

This is a wonderful project for all of Redondo Beach. Please don't let the entitled folks who live in the condos along the Harbor blocking the views from Catalina Avenue or the ones that have a political agenda destroy this wonderful vision for our children.

Response to Comment PC201-1

The commenter has provided general information that does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC202 PERRY COHEN

Comment PC202-1

My name is Perry Cohen and I live at 1226 South Gertruda Avenue in Redondo Beach.

I have owned this home since 1980 and enjoy living near the ocean.

I am writing this note to support the Redondo Beach Waterfront project.

Although the plan for the changes to the Redondo Beach Pier and Waterfront area are not perfect, these changes are necessary to make Redondo Beach a vibrant community that is appealing to residents and tourists.

The people in charge of this project should always consider the following priorities when designing the new Waterfront:

1. The environment (the ocean, beaches and wildlife in the area)
2. The people (residents and tourists needs)
3. The business community (small businesses old and new)

I look forward to seeing progress with this important project this year

Response to Comment PC202-1

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC203 GRETCHEN LLOYD

Comment PC203-1

Where are the traffic impact studies on the traffic in and out of the Pier and Harbor area from PCH, Torrance Blvd., Harbor Dr., Herondo Ave., Beryl Ave., etc. concerning the trucks and delivery vans? Where are the traffic impact studies concerning the overall traffic in this same area for the week-ends?

Response to Comment PC203-1

As detailed in Section 3.13, Traffic and Transportation, and Appendix L1 of the Draft EIR, a traffic study was prepared based upon an area of roughly 3,000-foot radius of the project site. Specifically, the traffic study included and analysis of 41 key intersections located near or serving the project site (see Figure

3.13-1 in Section 3.13 for a figure of the study area and 41 intersections). Trucks and delivery vans were assumed in the analysis, as well as visitors and employees associated with the operation of the project site.

As discussed on Draft EIR page 3.13-51, delivery and equipment trucks were included for the construction traffic analysis. Trip generation for the project's operations were described in Draft EIR Section 3.13.4.1.1, and Appendix L1 page 40. As discussed in Appendix L1, "the model starts with ITE [Institute for Transportation Engineers] trip generation rates for each individual land use, but through the statistical processes of the model, calibrates the ITE rates to reflect the site specific and area context of the Project."[36] The specific ITE rates are referenced in the "Notes" in Draft EIR Table 3.13-11 (Appendix L1, Table 7 [e.g. "Land Use 820"]). The ITE rates and the calibrated rates are based upon studies of trip generation from similar types of land use developments throughout the state and country. These studies/rates include trips associated with all of the projects operations, including but not limited to visitors and delivery trucks/vans/refuse collection. For additional details on the project's trip generation calculations, please also see Appendix X-1 contained in Appendix L1, for a description of the MXD+ model. As described in greater detail on Draft EIR page 3.13-42 ("Trip Distribution") and Appendix L1 pages 11 and 43, these trips were assigned to the roadways in Redondo Beach. This includes intersections at PCH (Intersections 7, 10, 19, 24, 26, 31, 34, 36, 37, 38, 39, 40, 41), Torrance Blvd. (Intersections 25, 26, 27, 28), Harbor Dr. (Intersections 4, 9, 11, 15, 20, 35), Herondo St. (Intersections 4, 5, 6, 7), and Beryl St. (Intersections 16, 17, 18, 19).

Regarding weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Your comments are acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC204 JULIAN HARVEY

Comment PC204-1

First of all may I say how impressed I was with the recent (January 9th) meeting at the Crown Plaza hotel. The brief presentation that the City gave covering the DEIR was very informative.

Secondly – my own Neighborhood Watch group is having a meeting on January 30th to inform my neighbors about this project. Even though this meeting will be after the public comment period ends it will still be a valuable meeting to keep my neighbors informed. I have found that there is a lot of misunderstanding of what the City is doing regarding this project, even though it is public information on Redondo.org.

With that in mind I wonder if you would allow myself to give a brief presentation along the lines of what was presented as the introductory presentation on Saturday last.

[36] Refining the ITE rates with the MXD+ model is consistent with the Institute for Transportation Engineers guidance. As noted therein, the ITE user manual provides "[a]t specific sites, the user may wish to modify trip generation rates presented in this document to reflect the presence of public transportation service, ridesharing, or other TDM measures; enhanced pedestrian and bicycle trip-making opportunities; or other special characteristics of the site or surrounding area." (ITE Trip Generation, User's Guide, 9th Edition, page 1-2)

I found the presentation so very useful, as I am sure few people in Redondo will actually read the full DEIR, but may be inclined to read certain sections when they understand what the document is and also understand the process that the City will go through in advancing this project.

Please let me know what you think about the viability of my presenting of something along the lines of the City's DEIR introductory" presentation to my neighbors.

P.S. Is the presentation public domain?

P.P.S. I will probably be sending in a few comments re: the DEIR, of my own to you before January 19th.

Response to Comment PC204-1

The comment does not address an environmental issue. The power point presentation associated with the three Draft EIR public meetings can be viewed on the City's website at http://www.redondo.org/civica/filebank/blobdload.asp?BlobID=29987. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC205 JILL JOHNSON

Comment PC205-1

I have attended community-organized meetings and reviewed highlights the DEIR and have some major issues with it, as a community member, and someone who lives 2 blocks away from the Harbor.

I do believe that there are some major facelift pieces needed there and I do understand the economics of what it will take to build business there, etc. BUT there is NO plan for infrastructure upgrades to sustain that kind of traffic and change to the community, which will cause most people to stay away and not bother; I am a water-woman, and my passions for this area will be dampered by lack of real access and stacked parking; there is nothing that will support large 4K SF business, let alone a 1000 seat movie theatre; there is nothing here for banning plastic and other waste, adding to our environment/ocean awareness concerns.

We need to find a happy medium for this project vs. greed and legacy.

Response to Comment PC205-1

The commenter incorrectly asserts that "there is NO plan for infrastructure upgrades to sustain the kind of traffic and change to the community…" As described in greater detail in Draft EIR Section 3.13, Traffic and Transportation and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, eight mitigation measures and one condition of approval have been proposed associated with traffic, including six roadway improvements. Key project elements also include other types of infrastructure upgrades (including a new parking structure and Pier Parking Structure replacement, the Pacific Avenue Reconnection, pedestrian and bicycle bridge, various enhancements to pedestrian and bicycle circulation, etc.) to improve the accessibility associated with the proposed project. The project also includes the construction of a new on-site stormwater drainage system and an upgrade to the existing wastewater lift station. (Draft EIR page 2-75.) The stormwater improvements are expected to reduce the amount of stormwater and improve water quality in King Harbor. Under existing conditions, the project site is composed of approximately 79 percent impervious surfaces and results in stormwater (including any pollutants associated therewith) draining into King Harbor. (Draft EIR, Section 3.8, Hydrology and Water Quality, page 3.8-7 through 8.) With implementation of the proposed project, there would be a reduction in impervious surfaces in comparison to baseline, and infiltration/retention facilities

would be incorporated to capture the first 0.75 inches of rain (during a 24-hour period). (Draft EIR pages 3.8-58 through 59.)

As for the projects ability to attract patrons, as well as the 700 seat (not 1,000) specialty cinema, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

The commenter also asserts “there is nothing here for banning plastic and other waste.” The Draft EIR discusses solid waste in Section 3.14, Utilities. Sections 3.14.2.3 and 3.14.3.3 provide an overview of the existing environmental and regulatory setting regarding the City’s solid waste programs. As noted in these sections “The City is a member city of the Los Angeles Regional Agency (LARA)...As of 2010 LARA’s [landfill] diversion rate was 70 percent.” Impact UTL-3 further explains, “the City has programs for meeting and exceeding the AB 939 landfill waste diversion requirement of 50 percent, as well as working towards the statewide goal of 75 percent landfill waste diversion by 2020. Implementation of the project is expected to include solid waste reduction features, such as providing recycling receptacles. Impacts associated with solid waste were determined to be less than significant.

The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC206 GREG DIETE

Comment PC206-1

It is hard to believe that the "mammoth" size of this Water Front Project per the DEIR has no significant impact to King Harbor/Pier area and the surrounding communities.

I think, if the developer, CenterCal, had been honest with the people who attended the public meetings at the Redondo Beach Performing Arts Center many of these questions would not be necessary. The public meetings with the developer and young student architects became a different "developmenf' at the very last meeting with roads, tall walls of concrete garages and an 8OO' long hotel added. Everything was kept “flat”' .... two dimensional, CenterCal never produced the simple 3 Dimensional model they had promised to the public. The public was not permitted to speak or ask any questions at this last meeting. After that last meeting CenterCal went into "hiding" so to speak. World famous architect Frank Gehry worked with cardboard models of the projects he designed. The "public" deserves the promised 3-D model.

Why does the DEIR find no significant "Public View" blockage/elimination from this 500,000 square foot commercial development with two multi-story garages for 1DO's and 1DO's of vehicles?

Instead of costly mammoth garages, half empty most of the year ..... have a private valet parking system during peak times. Later on.... if the Water Front Project is wildly successful a parking garage could be part of the AES site development.

Why does the DEIR not find "Public View" blockage/elimination from Harbor Drive, the Linear Park at Diamond St. and Veterans Park? The DEJA Figure 2-8 shows 900' of Harbor Drive with only a 120' wide potential Ocean view corridor, because of the SCE easement. Ocean views from the Linear Park are blocked by Building F and Veterans Park Ocean views are blocked by the parking garage and Hotel.

Why is this 6,800 page, $1,000,000+ DEIR void of any building and parking structure height elevations except for possibly the Conceptual Site Plan Figure 2-8?

Why does the CSP Fig. 2-8 shows "heighf' numbers that are less then 1/16" in height and can barely be read with a magnifying glass?

What does T.O.P. on CSP Fig. 2-8 mean?

Why do at least eight buildings/structures have "heights" that exceed the "2010" Measure G 45 foot height limit?

Does the CSP Fig. 2-8 showing a 55' 0" T.O.P. number on the PIER garage comply with Measure G? How does the CSP Fig. 2-8 PIER garage plus the height of vehicles parked on top comply with Measure G?

Does the height of the 1978-80 Ron Saffran Development (PIER Plaza) plus the existing PIER garage on which it is built comply with Measure G

The California Coastal Commission in a public hearing with the developer of PIER Plaza came to an agreement on the height of the buildings being built there.

What is the height of the DEIR proposed Harbor Drive parking lot? Does this parking lot have below grade parking levels like the Sheraton Hotel across the street?

Why does the CSP Fig. 2-8 not provide building heights for the 800' long "Hotel?"

Why does a 6,800 page, million dollar plus DEIR, paid for by the "developer," go to such extremes to hide the negative impacts of this Water Front Project?

What would the grade level of the extended Pacific Avenue be relative to the existing adjacent Ocean Club and the Village Condominium residential buildings?

Why does the DEIR find no significant health impacts to the residence living in the Ocean Club Apartments and the Village Condominiums from the extension of Pacific Avenue to Torrance Blvd.? None of these units nor do the Sea Scape's have air conditioning. All these residents are "Green" and dependent on the Ocean breeze for cooling. In the 40 year+ history of the Ocean Club and Village Condominiums there has never been vehicle traffic from Pacific Avenue there.

Why not use an automated "Green" trolley system to accomplish an improved circulation system in the King Harbor/PIER complex instead of extending Pacific Avenue?

Where will all of the delivery and trash trucks that come with this 500,000 SF development go? I could not find It in the DEIR.

Does the DEIR Figure 3.1-22 show "dark sky" lighting that doesn't shine into residential apartments and condominiums adjacent to a proposed Pacific Avenue road connection to Torrance Blvd.?

Why does this Water Front DEIR reduce the size of the existing recreational facilities?

Why are the number of existing parking spaces for trailered boats being reduced by 30%?

What visitor boat slips are available for Marina del Rey and Long Beach yachtsmen? I was not able to find them.

Why is the existing "Sea Side Lagoon" being down sized by 50%?

Why is the wooden "day" boat fishing pier with "Polly's" and the Bait Shop being eliminated?

Why does the DEIR find no significant impact on recreational opportunities when boater's parking and the "kids" Lagoon are being down sized?

It takes a real stretch of one's imagination to see how this project possibly adds any open space, recreational opportunities and keeps the existing "public" Ocean views.

Why does the DEIR not account for the impact that the future development of the 50+ acre AES power plant site will have on Redondo Beach residence quality of life? The AES site development in the future could add another 12,000+ vehicle trips.

If the AES site design put a parking garage on the east side of Harbor Drive, it'd save priceless Ocean views on Harbor Drive.

Why does the DEIR find no significant impact from 12,500 additional daily vehicle trips generated by the Water Front Project? Did the DEIR conduct any of these traffic studies on a typical summer weekend?

How does rental office space and a movie theater on the Water Front enhance the "public's" experience of the beautiful California coastline and help keep these priceless Ocean views?

In reviewing this DEIR I was reminded that the California Coastal Commission guidelines basically state that the beauty and splendor of the California coast naturally exists, and is not enhanced by building more concrete structures at the beach.

Response to Comment PC206-1

This comment is identical to Comment PC152-1 through PC152-23. Please refer to Response to Comments PC152-1 through PC152-23 above. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC207 CHRISTINE & DENNIS JOYCE

Comment PC207-1

Please do not let the sports fishing pier go...we visit every year from the uk and love spending time at pollys and enjoying watching the wildlife...it is a charming tourist attraction.

Response to Comment PC207-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC208 ALLAN MASON

Comment PC208-1

The hand-launch boat dock adjacent to the Seaside Lagoon is a unique resource in Santa Monica Bay. I don't believe there's a similar launch site anywhere on the Bay. Especially in recent years, this dock has experienced a surge in usage from kayakers, paddleboarders, and fishermen. The ability to dry-launch from a dock that's easy to drive to and park near is a huge advantage over the beach-launch situation being proposed along with the sad demise of the enclosed Seaside Lagoon. This public access to our beautiful South Bay waters must not be compromised, and I strongly suspect the Coastal Commission will agree.

Response to Comment PC208-1

The proposed project does include opportunities for small boat launching at the proposed small craft boat launch ramp facility, and it opens up Seaside Lagoon to the public year around. The newly opened Seaside Lagoon also includes hand launching and access for small boats, kayaks and paddle boards. The proposed project also includes short-term loading and unloading areas on the new main street adjacent to the lagoon, which could be used by park users to drop off coolers, paddleboards, or other recreational equipment/supplies at the park. For additional information on the lagoon, please refer to Master Response #4: Modifications to the Seaside Lagoon.

The comments do not introduce new environmental information, nor do they directly challenge information presented in the Draft EIR. The comment is acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC209 GRETCHEN LLOYD

Comment PC209-1

What are the improvements for the use of the Harbor as an Ocean resource? How are actual approaches for the kayakers, stand-up-boarding, etc, going to work when there is not enough convenient parking to load and unload the boards safely. How will this new arrangement impact the use of the Ocean as an Ocean recreational area.

Response to Comment PC209-1

Please refer to Response to Comment PC208-1 above. As described in Section 3.12, Recreation of the Draft EIR, the proposed project would improve and expand recreational resources. This includes enhancement of biking and walking paths, implementing a boat launch ramp, renovating existing facilities, and providing high quality open space. Recreational enhancements also include opening the Seaside Lagoon to harbor waters, which would provide a number of benefits to the lagoons operations, including but not limited to: (1) the proposed project would allow the lagoon to be open year round (rather than just over three months a year under existing conditions), (2) the proposed project would eliminate the physical fencing and barriers that separate the lagoon from the rest of the Harbor, (3) the lagoon would no longer require a fee to access the facility (as occurs under existing conditions), (4) individuals will be able to access the lagoon to launch paddle board and kayaks (which is not available under existing conditions), (5) the project will provide improved pedestrian and bicycle access to the lagoon, and (6) provide improved concession and accessory uses (such as recreational sales/rentals).

As for convenient parking for loading and unloading, the road (portion of the new main street) and parking stalls located within the park area would provide Seaside Lagoon access, including provisions for designated short-term loading and unloading of other recreational equipment/supplies at the park (i.e., dropping off coolers, paddleboards, passengers, etc.), and handicapped access.

As also noted in the Draft EIR project description "Buildings located within Seaside Lagoon would include recreational uses, such as marine recreation products and rentals (e.g. kayaks, paddle boards, wetsuits)…" (Draft EIR page 2-56.) In addition, although there is currently no specific area within the project site to store SUP or kayaks, it is expected that the proposed project will include SUP storage in the area of the lagoon.

COMMENT LETTER NO. PC210 KELLY CHARLES

Comment PC210-1

I've lived in RB almost 25 years. It astounds me how our City Government has gone for decades letting our Waterfront deteriorate and now wants to turn it into basically a shopping center with a movie theater and huge "block" type buildings ruining our HARBOR. The fact that the DEIR says there will be virtually "no impact" is a farce. People in the CenterCal video say, "Nobody comes here anymore." Really? I had breakfast with Hubby at Barney's over the weekend. There were people everywhere.

Response to Comment PC210-1

Please refer to Response to Comment PC077-1 regarding the results of the Draft EIR.

Comment PC210-2

I have been asking Fred Bruning for over two years where the delivery trucks and large tour buses will go/park/queue up. Where will all the garbage be placed and from where will it be picked up? No answer yet. If nobody comes to the Pier, then why are delivery trucks lined up around the Torrance Circle delivering food, alcohol, and other goods all day long? Please see the attch'd pictures. In just a couple days, I jotted down the delivery trucks I saw from my kitchen window. Many of these are huge vehicles. Let me just list some of these trucks for you:

[For the photos included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

U.S, Foods, World Divide
SYSCO
Waxie
Pacific Fish Co.
Fresh Point Product Coca Cola
Pepsi
Jack Daniels
P Wiser's Whiskey
FedEX
UPS
Aramark Corona Office Depot
Worldwide Produce Nature's Produce
Ocean Fresh Fish & Seafood Kona Brewing Co
Penske
Individual Food Service
Sparklette's
Budweiser Brinks Driftwood Dairy Stone IPA
Pacific Wine Distributors
IFS, Independent Food Service Pace Freight Systems
Viele & Sons Monster Energy Newport

That's a lot of trucks, 32 in my list. That is not even all of the delivery trucks. If this many trucks line the Torrance Circle now, what on earth will happen when they overdevelop the area and we have 10 times more delivery trucks? Notice the lovely Athens trash dumpsters on the street too? Nowhere in that slick video do I see a designated place for the trucks and huge tour buses to go. We were promised a 3D mock up in 2012

and have yet to see one. People are angry because Fred Bruning won't answer our questions and work with us. That is crystal clear. And Bruning knows he has the City backing him every step of the way.

Response to Comment PC210-2

Chapter 2, Project Description, of the Draft EIR, describes the service and loading areas associated with the proposed project. Table 2-2 (page 2-47) gives a summary of existing and proposed conditions, with a more detailed description on page 2-78. As shown on Figure 2-22 (on page 2-79 of the Draft EIR), designated service and loading areas would be located on the northern and southern portions of the site. On the northern portion of the site, service and loading areas would be located along the proposed parking structure within the project site. In the southern portion of the project site, there would be a service and loading area to the north of the new parking structure, adjacent to and serving the hotel and retail uses. The loading and service area would be accessed from Pacific Avenue and the area partially enclosed and screened from view. The traffic analysis (Section 3.13 of the Draft EIR) assumed traffic associated with delivery and service vehicles based on the proposed land use mix, and the noise section (Section 3.10 of the Draft EIR) addressed the noise associated with service and loading areas and their location relative to noise sensitive receptors. Please also see Response to Comment PC203-1 for a more detailed discussion of the project's trip generation, which includes consideration of all potential trips associated with the proposed land uses (including delivery vehicles and buses).

The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) used to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the peered reviewed 3D computer model.

Comment PC210-3

The monstrosity would have been built already if it weren't for many concerned citizens who only want well-thought-out development that won't ruin our beautiful Harbor for the next hundred years. The city is not thoroughly PLANNING this project out. Just look at previous debacles with the structure by the post office that was supposed to be a WATER fountain. Then after it was completed, they then realized they could not have a water fountain due to the power lines directly above it. Then the example of reducing Herondo Street down to 2 lanes from 4 lanes. Sure, that's smart. Let's build a huge Lifestyle Center/Mall down at the Harbor, but let's first remove 2 lanes on a main artery to get people down there. A first-grader could have done better than that.

Response to Comment PC210-3

The commenter asserts that there has been no planning for the project. Contrary to this assertion the current zoning on the project site was prepared, considered, and approved by City Staff, Harbor Commission, Planning Commission, City Council, the California Coastal Commission, and the citizens of Redondo Beach (through Measure G). This included significant consideration by these bodies, including Harbor Commission's hearings held on August 13, 2007, February 11, 2008, and March 10, 2008. The Planning Commission also held public hearings on October 30, 2007, November 15, 2007, December 20, 2007, and January 17, 2008. The City Council also held numerous public hearings, including but not limited to September 11, 2007, April 8, 2008, April 22, 2008, as well as several meetings in 2010. The California Coastal Commission also held a meeting on the proposed amendments in 2009. The proposal from CenterCal has been reviewed and considered by the City's Planning Staff and has also been the subject of several meeting before City Council. Additionally, as part of the CEQA process, meetings associated with the Scoping Process were identified in the Notice of Availability and Notice of Preparation

beginning in 2014, and most recently the City Council meeting on November 17, 2015 for the release of the Draft EIR and the three meetings (November 21 and December 9, 2015, and January 9, 2016) associated with the public review of the Draft EIR. The commenter states an opinion that is outside the purview of an EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC210-4

Now that AES is selling their property, the two properties should be combined to carefully plan out and build a wonderful waterfront project that will benefit everyone and not overcrowd our streets and turn our harbor into a bunch of concrete boxy buildings. And a movie theater? Who is going to come to the beach to sit inside a movie theater? Have you not noticed, movie theaters are closing down all around the South Bay. This is absurd. Where will the boaters park? Opening up shrinking the size of the Seaside Lagoon is a mistake too.

Response to Comment PC210-4

The proposed project would not modify AES' property. As for the future AES project, refer to Master Response #1: AES Power Plant Site. Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, which addresses viability of project elements including the specialty cinema. Boaters using the small craft boat launch ramp facility will park in the surface parking lot adjacent to the ramp. Basin 3 tenants will park in adjacent parking structures. Refer to Master Response #4: Modifications to the Seaside Lagoon.

The comment does not address an environmental issue. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC210-5

Please, I beg of the City, STOP, plan wisely, and do not ruin our Harbor. Look at Pier Plaza now. Vacant, deteriorated buildings. Why? Because all that retail did not work in this area. Yes, the Waterfront/Pier needs revitalization, but in a responsible manner.

Response to Comment PC210-5

The comment does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC211 MARIA CASTILLO – CROWNE PLAZA HOTEL

Comment PC211-1

Love the Waterfront ideas! Exciting and I LOVE LOVE LOVE them all. The only sad and depressing to the whole idea of change is the Parking Garage in front of Our Crowne Plaza and Redondo Beach Hotel.

UGLY... Sadly, reminds me of the looks of the tight parking garages at Santa Monica and Downtown LA. ⟨Blah!⟩ No one here want's them, concrete vistas ruin the view.

Looks like I'll be selling room views overlooking the concrete parking garage. Wonder if Wyland would come out and paint them? Perhaps.

Response to Comment PC211-1

To clarify, the project site is not immediately in front of the Redondo Beach Hotel. Please see Response to Comment PC134-11 for discussion of views along Harbor Drive. As also discussed in the April 8, 2008 Administrative Report prepared for the City Council public hearing on the zoning for the project site: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.)

Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC211-2

My Big Question? Why not keep an ocean spacious view and work on making the AES Bldg. as that designated area for Beach Cities Parking. Bring in the RED LINE that was here years ago... MTA? why not. Bring on a railway like that of The Grove Train? Bring even more visitors and guest's to the area with some amazing transport options year round? Think of the transportation opportunity to share with that of Hermosa Beach, and Manhattan Beach our beach cities all need parking. ⟪$$$$⟫ Bottom line, why not think bigger and better.

An impossible idea? Perhaps? but why not? Just think of the impossible... get the County and City of Los Angeles to pitch into the idea?

Response to Comment PC211-2

The proposed project would not modify AES' property (which is privately owned). Please refer to Master Response #1: AES Power Plant Site. Please see Response to Comment PC083-1 for discussion of transit and the commenter's recommendation for a local transit system serving the project site (i.e. a grove train). Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC212 JANET JOHNSON

Comment PC212-1

Please keep the Little Pier in the Redondo Beach Harbor

"Charm" is a key but often missing ingredient in largescale redevelopment.

The Little Pier has charm and so much more. It demonstrates that fishing is still an important and fun part of the harbor, both for those who do the fishing and for the many who watch.

It also maintains the valuable extension over the water for related commercial enterprises, hopefully smaller in scale and more "homey" that what might be built elsewhere in the waterfront. If you tear down the little pier, it is likely gone forever...just like so many of the other torn down landmarks from the past that now look extremely engaging.

This pier is perhaps the closest connection people can have with the vast opportunities to actually interact with the ocean itself, except for those who just want to go swimming or surfing. We should be

making it easier for people to experience things like whale watching trips, day fishing trips, or over-the-water dining at places like Polly's, not limiting these opportunities by taking down another important icon for Redondo Beach.

Replace it; make it even better! Don't erase this charming pier, scaled for families to enjoy in a leisurely way, stepping out over the ocean for an unfettered feeling of being really close to the ocean on the magical pier walkway.

Response to Comment PC212-1

Refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on existing businesses. As for over-the-water dining places within the project site, whether the Sportsfishing Pier is or is not reconstructed, the Horseshoe Pier will remain and continue to offer opportunities for over-water dining, as well as opportunities to interact with the water/Harbor. The comment is acknowledged and these comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC213 JOE EYEN

Comment PC213-1

Attached are four DEIR comment cards that we collected last Saturday

Response to Comment PC213-1

The comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC214 SCOTT FELLOW

Comment PC214-1

The only concern I have is the movie theater. Many have failed in the south bay I can give several examples

Response to Comment PC214-1

Regarding the specialty cinema, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC215 MEI SEE

Comment PC215-1

I support the project.
It help local businesses.

Response to Comment PC215-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC216 ALEX SEE

Comment PC216-1

I support the project. It would improve local infrastructure, and help local businesses.

Response to Comment PC216-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC217 CHRISTINA WENNSTROM

Comment PC217-1

I love Redondo Beach! I've built my small business that is inspired & based here in Redondo – I want my community to thrive. I support growth, in all aspects of one's life… whether personal or socially… & now with the waterfront project… residentially. Improving where we live & socialize is important. With a sustainable project like the waterfront, I'm looking forward to Redondo's growth for the future.

Response to Comment PC217-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC218 JIM DESALVO

Comment PC218-1

I sent you an e-mail a while back asking about the impact that the construction on the pier will have on Redondo residents. I have not heard back from you so I will ask again. How can it be that additional traffic, noise and congestion will not impact our way of life. I agree the pier needs to be retrofitted, but it does not require a miniature shopping mall. I feel the area won't support it and it will cause undue stress on the local residents, who should be first priority.

I look forward to your response.

Response to Comment PC218-1

Please see Response to Comment PC077-1 for response to your questions on December 6, 2015. The impact of construction of the proposed project is detailed in Sections 3.1 to 3.14 of the Draft EIR (specifically Section 3.10 relates to noise and Section 3.13 relates to traffic and congestion), and summarized in the Executive Summary. In addition, please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project with regards to traffic impacts and mitigations. As for the projects ability to support the proposed development, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. It should be noted that the project site is supported by existing infrastructure that will also support the proposed project. The comments are acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC219 JOANNE NEWMAN

Comment PC219-1

Regarding the DEIR

Please explain how the conclusion could possibly be reached that there will be no impact on the traffic with the huge increase of auto traffic to and then into the Project? And was the addition of the many many many delivery truck / van trips caused by the Project factored into the so called traffic analysis? All these additional vehicles will cause a massive increase in the noise, pollution, and traffic gridlock. And BTW does anyone even know what provisions have even been made for where those same delivery trucks / vans are going to go once they are within the confines of the Project? Surely that needs to be taken into account and it doesn't appear to be a concern at all of CenterCal or those preparing the DEIR. Or is that not a concern of the EIR? If not, it surely should be.

Response to Comment PC219-1

As detailed in Section 3.13, Traffic and Transportation, and Appendix L1 of the Draft EIR, a traffic study was prepared for an area of roughly 3,000-foot radius of the project site, which included an analysis of 41 key intersections located near or serving the project site (see Figure 3.13-1 in Section 3.13 for a figure of the study area and 41 intersections). For a summary of the traffic analysis, please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As for delivery truck/vans, the traffic analysis assumed these trips, as well as visitors and employees associated with the operation of the project site. Please see Response to Comment PC203-1 for a more detailed discussion of the project's trip generation.

Chapter 2, Project Description, of the Draft EIR, describes the service and loading areas associated with the proposed project. Table 2-2 (page 2-47) gives a summary of existing and proposed conditions, with a more detailed description on page 2-78. As shown on Figure 2-22 (on page 2-79 of the Draft EIR), designated service and loading areas would be located on the northern and southern portions of the site. On the northern portion of the site, service and loading areas would be located along the proposed parking structure within the project site. In the southern portion of the project site, there would be a service and loading area to the north of the new parking structure, adjacent to and serving the hotel and retail uses. The loading and service area would be accessed from Pacific Avenue and the area partially enclosed and screened from view. The traffic analysis (Section 3.13 of the Draft EIR) assumed traffic associated with delivery and service vehicles based on the proposed land use mix, and the noise section (Section 3.10 of the Draft EIR) addressed the noise associated with service and loading areas and their location relative to noise sensitive receptors.

Your comments are acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC220 GRETCHEN LLOYD

Comment PC220-1

What is the impact of the increased traffic on entering and exiting the businesses along Harbor Drive, particularly on week-ends? At this time the traffic is backing up on Harbor Dr whenever a car wants to turn into or out of any of the businesses along that area.

Response to Comment PC220-1

Please refer to your previous comment dated January 10, 2016, Response to Comment PC203-1 above, for information on weekends. The impacts associated with the project's trip generation/distribution are described in Draft EIR Section 3.13, Traffic and Transportation. The traffic analysis (Section 3.13 and Appendix L1 of the Draft EIR) detailed the traffic associated with the proposed project, including the key roadway facilities that serve the project site, such as Harbor Drive.

COMMENT LETTER NO. PC221 JIM VEECK

Comment PC221-1

I am 100% for the new waterfront in it's entirety.

Response to Comment PC221-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC222 DIANA DAVIS

Comment PC222-1

I'm a resident of North Redondo and I work in South Redondo. I'm in favor of the Waterfront project. I often take a walk on the strand and walk through the pier. I hardly ever stop to shop because there's nothing of interest to buy. I never go to the restaurants. The old ones look dirty and run down and not inviting. I would love to have a beautiful pier area where there are places to shop, eat and stroll.

Response to Comment PC222-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC223 JASON MAY

Comment PC223-1

My name is Jason May and I am a redondo beach resident (90278).

I would like to comment in favor of the redevelopment. It will do several things for our city,

1) It will provide more venues for entertainment. Currently my wife and I go to other cities (hermosa, Manhattan, etc) to eat out or take guests. It would be great to have a nice area to go in our own city.

2) It will increase tax revenues for the city, which can be used for local services or potentially a reduction in property tax rates

3) It will be good for local property values. This has a secondary effect of increasing tax revenue as more people move to the area and purchase higher valued homes.

Our city is in competition with every other local municipality for jobs, professional residents, tourists and their tourism funds and tax dollars, and this redevelopment will help us become competitive as a city with broad ranging benefits

Response to Comment PC223-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC224 JOYCE TOPPING

Comment PC224-1

Following are some of my key objections to the current proposed Waterfront Development Project:
View Obstruction: With the current proposed project including 3 story structures, the views that drive our property values (and that we purchased as part of our dwellings) will be reduced by 80%. The ocean views enjoyed by visitors and residents surrounding the Redondo Beach Pier will be overwhelmingly lost. This sacrifice by residents to, (if successful,) bring visitors in from other cities, seems a poor tradeoff for the current residents of our city.

Response to Comment PC224-1

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. Please see Section 3.1, Aesthetics and Visual Resources of the Draft EIR for analysis of aesthetic impacts. Please also refer to the Master Response #9: Views and Scale of Development.

Comment PC224-2

Traffic and Parking impact: With a proposed increase of 140% in development along our waterfront, we see only an 8% plan for additional parking. The impact will push visitors to residential street parking in surrounding areas, or due to the difficulty in parking, visitors will simply opt not to visit our area. With an estimated traffic increase of 88% with an additional 10,000+ additional car trips a day we will soon experience the type of gridlock, we currently see in West Hollywood area.

Response to Comment PC224-2

Please see Draft EIR Section 3.13, Traffic and Transportation for a discussion of parking. Refer to Chapter 3, Modifications to the Draft EIR within this Final EIR for any clarifications and/or updates related to parking. It is unclear as to whether the commenter is including the Plaza Parking Structure, reconstructed Pier Parking Structure and new parking structure when estimating parking for the proposed project. Please refer to Master Response #7: Waterfront Parking.

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC224-3

Water Quality: Negative impact to water quality, when current Redondo Beach has a 2015 Heal the Bay grading of F for winter and wet months. Reducing the current size of the Seaside Lagoon is not likely to reduce the E-coli and fecal substandard scores moving forward.

Response to Comment PC224-3

Section 3.8, Hydrology and Water Quality of the Draft EIR, which details and analyzes the potential impacts of the proposed project on water quality. As discussed therein, the project would not exacerbate existing water quality in King Harbor, and would result in water quality improvements. Under existing conditions, the project site is composed of approximately 79 percent impervious surfaces and results in stormwater (including any pollutants associated therewith) draining into King Harbor (Draft EIR, page 3.8-7 through 8). With implementation of the proposed project, there would be a reduction in impervious surfaces in comparison to baseline, and infiltration/retention facilities would be incorporated to capture the first 0.75 inches of rain (during a 24 hour period) (Draft EIR pages 3.8-58 through 59). Furthermore, seaside lagoon currently requires chemical treatment to remove chlorine prior to draining the water into the King Harbor; with implementation of the proposed project, this chemical treatment would no longer be required (Draft EIR page 3.8-61). Water circulation modeling also indicates that the modifications to seaside lagoon would not change the water exchange time in the harbors, and that seaside lagoon would be have shortest exchange time out of the three marina basins (Draft EIR page 3.8-63).

Comment PC224-4

Noise and air quality impact: Increasing the pier facility by an additional 304K feet, more than doubles the size, thus more than doubling the potential noise impact to residents. The close proximity of the proposed road to the existing residential buildings, will negatively impact residents with additional noise, and air quality issues. One such building includes a senior living facility, whose impact must be taken into account

Response to Comment PC224-4

Section 3.2, Air Quality and Section 3.10, Noise of the Draft EIR address potential air quality and noise impacts, respectively, associated with construction and operation of the proposed project. The analyses account for the net increase in building area associated with the project and address potential impacts to sensitive receptors in proximity to the project site. As discussed in Draft EIR Section 3.10.4, the City utilized specific sensitive receptor locations (i.e. monitoring locations) which also represent receptors located in close proximity to these locations. These receptor locations are described in Table 3.10-2. The commenter also incorrectly asserts a direct relationship between the square footage of the project and noise levels. Please see Draft EIR Section 3.10 for a discussion of noise analysis methodology. In addition, operational-related traffic noise impacts were also found to be less than significant, with the exception of a projected increase in existing ambient noise levels along Torrance Circle/Boulevard between the project site and Catalina Avenue that would occur in conjunction with the proposed reconnection of Pacific Avenue. That impact is acknowledged on page 3.10-33 of the Draft EIR as being a significant and unavoidable impact of the proposed project.

Regarding the senior living facility, the commenter did not indicate the name or location of the facility referenced in the comment. The City is aware of three senior living facilities in the general vicinity of the project site: Casa De Los Amigos at 123 S. Catalina Avenue (approximately 500 feet east of the closest boundary of the site); Seaside Villa at 319 North Broadway (approximately 750 feet northeast of the closest boundary of the site); and, Seasons Senior Apartments at 109 South Francisca Avenue (approximately 1,500 feet east of the closest boundary of the site). The closest of these facilities is represented by Noise Monitoring location number 8. As described in Draft EIR Table 3.10-9 (page 3.10-32), operational roadway noise was determined to increase slightly (0.5 dB), but was less than significant. The other facilities are located even further from the project site, and would be subject to even lower noise levels. The scope of the noise analysis is fairly limited, as discussed in Draft EIR Section 3.10.2.1, noise levels attenuate rapidly with distance, as well as from barriers, including topography, buildings, walls, and

landscaping. The City included several more distance noise measurement locations to confirm potential roadway noise from the project would be less than significant (e.g. location 11). As demonstrated in Table 3.10-9, the roadway noise level increase at location 11 is 0.1 dB (which would not be a perceptible change) and was determined to have a less than significant impact. Roadway noise would be even less pronounced at locations even further away from the project site. As demonstrated in the transportation analysis, Section 3.13 and Appendix L1, vehicles trips to and from the project site disperse as distances increase from the project site, as individuals travel to their specific destinations/origins. Concerning construction-related noise impacts, temporary increases in existing ambient noise levels due to construction traffic would be well below the significance thresholds at the aforementioned noise monitoring locations. As indicated in Table 3.10-11 (page 3.10-35 of the Draft EIR), increases in ambient noise levels due to project-related construction traffic are estimated to be 0.4 dB (not be a perceptible change) near monitoring location 8 and 0.1 dB near location 11. Significant noise impacts related to the operation of on-site construction equipment would be limited to noise-sensitive receptors located in close proximity to the project site, as described in Section 3.10 of the Draft EIR, and would not extend to any of the senior living facilities noted above.

COMMENT LETTER NO. PC225 CHRISTINE JOHNSON

Comment PC225-1

We are in definite need of the pier area revitalization to benefit the community and visitors. We need to support an area that is safe and pleasant where we can feel comfortable spending time in, eating, shopping and just walking through. Recently we had a family gathering with relatives here from around the country. We ate at Kincaids, The Cheesecake factory and The Blue Water Grill but stayed away from the unpleasant and rundown pier area in which I was embarrassed to have my relatives see. I referred them to Hermosa and Manhattan Beach areas to visit and bike to.

I would like to be able to walk or bike from Torrance Beach area, where I live to the pier and lock my bike without feeling threatened or like I cannot leave my bike out of sight for fear it will be stolen, with many undesirable people walking around.

I am all for cleaning up and revitalizing the area!

Response to Comment PC225-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC226 DAVID WARNER

Comment PC226-1

I have gone to a coffee gathering of interested citizens and followed the progress on the newspapers and internet. I think the project could not be much better.

The decay of the underground parking lot is concern enough. But to bring some nice restaurants, a theater, a market, a better lagoon is outstanding.

I've heard the vocal dissenters of this project, and I don't buy into their concerns.

I fully support the Waterfront project, and look forward to its success.

Response to Comment PC226-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC227 ANN HUNTSMAN

Comment PC227-1

I wish to raise my concerns re this report. What seems to be overlooked: noise, traffic, loss of views, traffic, pollution - all factors that seriously affect lifestyle, health and ambience in this beautiful area.

Response to Comment PC227-1

The Draft EIR analyzed in detail noise (Section 3.10, Noise), traffic (Section 3.13, Traffic and Transportation), views (Section 3.1, Aesthetics and Visual Resources), and air pollution (Section 3.2, Air Quality), associated with implementation (construction and operation) of the proposed project. For a summary of the environmental impacts of the proposed project and alternatives, the Executive Summary is a recommended read.

The commenter states an opinion and does not introduce new environmental information or directly challenges the information presented in the Draft EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC228 KEITH PIPPARD

Comment PC228-1

Time to change the pier for the future!

Response to Comment PC228-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC229 NICLAS CHAVEZ

Comment PC229-1

I support the Redondo Beach Waterfront Project, this project will enhance and beautify our city. The current waterfront is in desperate need of repair. Our city needs to elevate its status to at least replicate but hopefully surpass its historical status as a destination stop for all to visit. This project should assist in this transformation.

Response to Comment PC229-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC230 REBECCA BAKER

Comment PC230-1

I am also a Redondo Beach Resident and am so thrilled about the potential of the waterfront.
Redondo Beach doesn't have a hip gathering place for it's residents, nothing beautiful to be proud of. It's old, sleepy and a bit run down. Every time friends and family come to town, we take them to eat at Manhattan beach Post or to Abigail's in Hermosa, never once have we taken visitors to dine or shop in Redondo. Would love to have a place in our own town to be proud of.

Response to Comment PC230-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC230-2

[The second half of the comments are a forward of Jason May's comments – Comment PC223-1]

Response to Comment PC230-2

Refer to Response to Comment PC223-1.

COMMENT LETTER NO. PC231 PATTI LINNETT

Comment PC231-1

I just wanted to weigh in on the Waterfront Project.

First, let me state that I support the Waterfront Project. I am one of the artists who designed and created the "Ocean Steps" mosaic stairs. My mosaic partner, Debbie Collette, and I met with one of CenterCals' engineers and JeanPaul Wardy over a year ago to express our concern that the "Ocean Steps" not be destroyed through this revitalization process. These stairs were the first public art project approved by the public art commission. We gave five months of our time for this project, and over 50 volunteers helped Debbie and me to create this gift (we charged no fee) to the city of Redondo Beach. I truly hope that CenterCal takes all of this into consideration when planning and designing around this beautiful addition to the waterfront.

Response to Comment PC231-1

Section 3.1, Aesthetics and Visual Resources of the Draft EIR addresses public art, including the Ocean Steps (page 3.1-22). As noted on page 3.1-60 of the Draft EIR, the construction of the new bicycle path and Pacific Avenue Reconnection would require the replacement of the Ocean Steps. Please also see Draft EIR pages 3.4-27 and 3.4-53 through 3.4-55 for additional analysis of cultural resource and the ocean steps. The applicant will work with the Redondo Beach Public Arts Commission to establish a similar feature to the Ocean Steps tiles on the new stairway.

The commenter states an opinion and does not introduce new environmental information or directly challenges the information presented in the Draft EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC232 RITA HORA

Comment PC232-1

My name is Rita Hora, and my husband is Surjit Hora, we live at 230 The Village, unit 203.

We were at the meeting last night at our neighbor's house led by Michaela Marraffino of Centercal. My husband and I moved from New York to this beautiful Redondo Beach two years ago. However, we did not know at that time what was in store regarding construction and repairs. I had written a letter to The Beach Reporter, which was published, stating our concerns regarding the proposed plan. Yes, we should definitely repair the ruins, bring some nice restaurants here, facelift the entire pier. However, constructing the road is not a good idea. I saw the pictures, it is looking commercial, not at all pedestrian friendly and it is not the lifestyle we chose. My suggestion is to have cobblestone boardwalk, instead of road, or have trolley. Road is so undesirable, not to mention the traffic, noise, etc. please go head renovate, but keep in mind the residents who live here, we will be so crushed. I hope you will consider our feelings about not building the road and take an alternative route. I thank you for the opportunity to communicate with you.

Response to Comment PC232-1

As described throughout the Draft EIR (in particular, Chapter 2, Project Description and Section 3.13, Traffic and Transportation), the Pacific Avenue Reconnection would enhance circulation at the project site. In fact, until the 1970s, when the original Pacific Avenue and El Paseo (streets along the waterfront) were removed, the past conditions consisted of connection of the public to the waterfront via Pacific Avenue, El Paseo, Harbor Drive and various other streets (see Figure 2-2, page 2-7 of the Draft EIR, which shows a map of the City from 1927 including the former configuration of Pacific Avenue and other waterfront roadway connections). The Pacific Avenue Reconnection would be a reconnection of the roadway access that once served to provide public access and connectivity along the coastline. This roadway would also greatly improve emergency access and protection service throughout the project site (refer to Section 3.11, Public Services of the Draft EIR for additional information). However, please note that three of the seven project alternatives (Alternatives 1, 2, and 5) do not include the Pacific Avenue Reconnection; please see Draft EIR Chapter 4, Analysis of Alternatives. Please see Response to Comment PC083-1 for discussion of transit and the commenter’s recommendation for a local transit system serving the project site (i.e., a trolley). Please also see Draft EIR Section 3.10 for analysis of noise.

The commenter states an opinion and does not introduce new environmental information or directly challenges the information presented in the Draft EIR. Your comments will be included in the Final EIR presented for revietw and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC233 DEBORAH SHEPARD

Comment PC233-1

I've been active in the tourism side of Redondo Beach for the past 13 years and a former 8 yr resident of N. Redondo. I support the CenterCal project for its comprehensive and sensitive redevelopment plan. To keep visitors adding $4M a year in bed taxes, we must improve not only the infrastructure; but also the overall look and feel of the "experience" Redondo can offer business, leisure and international guests.

Let's move forward...now and quickly.

Response to Comment PC233-1

Your opinion on the proposed project will be included in the Final EIR presented for review and

consideration by the City's decision-making body.

COMMENT LETTER NO. PC234 LEA ANN KING

Comment PC234-1

I would like to register my support for maintaining the little pier as it is. Support the renovation of the big pier and the Redondo Beach revitalization plans. However, it would be important in my estimation to retain a touch of the old traditions as well. I have enjoyed taking my grandchildren to Pollys for breakfast on the weekends. We watch the fishing boats come in and get a taste of the old days. It reminds me of visits to New England.

I have lived in the area for 40 years and appreciate the bountiful food of Pollys and the particularly charming and unique atmosphere. As the beach cities become more developed, it would be a shame to lose a piece of charm and history. Polly's always has been a secret destination for many of us. Unknown too many outsiders. I would love to keep his hidden gem for the residents

Response to Comment PC234-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC235 JOHN WHITAKER - KING HARBOR MARLIN CLUB

Comment PC235-1

The recent storms + high waves should be enough evidence to prevent a boat ramp one Mole A. The parking lot was damaged + the road closed. Building a ramp, gas dock + park here would be a disaster! Even this event (not the biggest ever) would have torn out the docks + potentially set up a fuel spill into the harbor. Boaters safety + environmental issue would be at risk. Personally I do not think a ramp anywhere in K.H. is needed. Update the hoist or even subsidized the hoist and boaters could be served at much less risk and less money. If you must put in a ramp then choose Mole C. It is safer, provides more room to maneuver the boasts and is a much shorter distance to the harbor mouth. Less driving in the harbor waters means less pollution in our waters.

Please consider the safety, environment and cost issues not to mention liability potential when deciding where to build this ramp if totally necessary.

The access into + out of mole A with the new parking lot and bike lanes is a totally separate issue but would be a driving nitemare and surely some biker will be hit by a trailor trying to make a right or left turn into the area. The cost of totally redoing the area and access should be considered

Response to Comment PC235-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A (See Chapter 4, Analysis of Alternatives - Alternative 8 of the Draft EIR.) The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. The commenter states an opinion/preference relevant to the boat ramp alternative location. Please refer to Master Response #8:

Boat Ramp in King Harbor for additional information regarding Mole A, including concerns over waves, storm surge and access. It should be noted that no 'gas dock' is being proposed in association with the boat ramp (at any of the locations proposed). The City understands the need for a public hoist and is looking at an alternative location at which to support a hoist in King Harbor but outside of the project site. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC236 JUDITH FARRELL

Comment PC236-1

Please save Polly's restaurant and the little pier. I live in Redondo and love Polly's and whale watching.

Response to Comment PC236-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC237 WILLIAM THON

Comment PC237-1

Looks like a project long overdue. Redondo Beach has fallen far behind the other nearby destination beach cities and as lovely as it is, it is still in great need of a facelift. Will be some inconveniences for locals for a while, but when finished I believe everyone will be proud of the new look and feel. We own a condo that overlooks the harbor.

Response to Comment PC237-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC238 CELESTE COAR

Comment PC238-1

I have fond memories of this pier from decades past. It is truly a historical gem and exudes a great home town feeling of local charm and hospitality. Redondo Beach should know that we cherish Polly's on the Pier and the Voyager! Scrap what you want elsewhere, but save the pier!

Response to Comment PC238-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC239 ERNIE O'DELL

Comment PC239-1

I am strongly in favor of the renovations being proposed in the harbor area. Being a past business owner

on the pier, ⟪Starboard Attitude Lounge⟫ for eight years, I have witnessed first hand the deterioration of the pier and harbor area. Also as past City Treasurer of Redondo Beach from 1995 to 2013 I experienced the financial and functional problems associated with the Pier Parking building and the infrastructure surrounding it. I wish you the best of luck in bringing this vital area up to the standards it truly deserves.

Response to Comment PC239-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC240 CINDY COMPERT

Comment PC240-1

I heartily support efforts to make sure that Polly's and the Fishing pier stays in future plans for the harbor.

Response to Comment PC240-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC241 DAVID SIUREK

Comment PC241-1

I recently purchased a condo at 630 The Village, Redondo Beach. I am concerned the new construction may change my view of the ocean. Is there a way to determine if my view is going to be changed or lost?

Response to Comment PC241-1

Please see Section 3.1, Aesthetics and Visual Resources of the Draft EIR for an analysis of views and visual modeling associated with the project. In addition, refer to the Master Response #9: Views and Scale of Development. The Draft EIR provides an analysis of public views in Section 3.1 under the threshold AES-1 addressing "designated local valued view available to the general public." However, private views are not considered a local valued view available to the general public. Please note that the maximum potential heights of the individual structures are described in Draft EIR in Figure 2-8 (page 2-49).

The comment does not introduce new environmental information, nor does it directly challenge information presented in the Draft EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC242 ROBERT C COLE

Comment PC242-1

This reference below is from the current DEIR Executive Summary

ES.5.2.8 Alternative 8 – Alternative Small

Craft Boat Ramp Facilities within King

Harbor

I believe the Mole A sight should eliminated from this proposal for several reasons. The main reason is due to an extreme hazard to the public. I have studied this document and under "Hazards" I have not found a risk assessment to the public for granted access to a boat launching ramp in Mole A. Just this month I have witnessed life threating large ocean wave wash through this area. The period of time when these ocean waves appear are in the winter and early spring months (i.e. November through March). These waves initiate in the North Pacific thousands of miles from our harbor and can a show up unannounced at this location not only in storm conditions but also in perfect local weather conditions.

As a long standing member of King Harbor Yacht Club, I have personally warned several non-members of the yacht club that are not on the yacht club property but near the break wall structure to leave the area due to this hazard. The Fire Department and Police records over the last couple decades should show several calls to these departments requesting assistance for injures to members of the public.

Summary of deficiencies found within the current DEIR that need be addressed and included the final version of the DEIR discussion for Alternative 8 (ramp on Mole A):

1. It fails to present any risk assessment analysis to the general public safety by locating a ramp on Mole A.
2. It fails to discuss or assess the City's liability for injury, death and or property damage by virtue of creating a dangerous condition in locating and constructing a public ramp next to the main break wall structure.
3. It fails to present records and or analysis from the Redondo Police and Fire Departments of the numerous emergency responses to the proposed ramp on Mole A.
4. It fails to present any analysis of the wave action on the proposed ramp site, especially during the months of November through March.
5. Finally, it fails to discuss whether or not a boat ramp in said location is even feasible during said months.

Response to Comment PC242-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A. (See Chapter 4, Analysis of Alternatives - Alternative 8 of the Draft EIR.) CEQA Guidelines Section 15126.6(d) notes that the analysis of alternatives shall be described "in less detail than the significant effects of the project as proposed." Furthermore, CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392.) As outlined in greater detail below, the project would not exacerbate any existing problems, and would result in several safety related improvements in comparison to existing conditions.

The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a through 4-5c, the Alternative 8 – Mole A options include a 60 foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. The commenter states an opinion/preference relevant to the boat ramp alternative location at

Mole A. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A, including safety concerns associated with waves and access. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC243 GREG DIETE

Comment PC243-1

Please confirm receipt of DEIR.

I do appreciate the opportunity to comment on a small part of this DEIR I was able to review. Of course, it's ridiculous in this DEIR process to expect the general public, in the time given, to review and comment with questions on the entirety of this 6,800 page document.

Response to Comment PC243-1

The public review of the Waterfront Draft EIR was beyond the normal public review period. Per Section 15105 of the Sate CEQA Guidelines, the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days unless a shorter review period (not less than 30 days) is approved by the State Clearinghouse. On November 3, 2015, the City Council approved a 63-day review period of the Waterfront Draft EIR. This extended review period was provided given that a standard 45-day review period would have concluded on January 1, 2015. Since the standard review period conflicted with the holiday season, and a 60-day review period would have ended on a Saturday prior to a City holiday, the City Council approved the extending of the review period by 18 days for a total of a 63-day review period (January 19, 2016). Furthermore, the Draft EIR also provides a summary of the significance conclusions, mitigation measures, and alternatives in the Executive Summary Chapter.

Comment PC243-2

Chapter 2 of the DEIR refers to the Pier Plaza Development as a 70,000 SF Office Complex. When Ron Saffern developed the "top deck" in 1979-80 it was "sold" to the city and public as a coastal retail shopping complex with seven restaurants. The demographic and financial studies predictions for its success were all positive..... but the Pier Plaza was not a commercial success. The complex was eventually taken over by government and public offices and municipal court rooms. Originally the California Coastal Commission did not permit this development to be an Office Complex, because business offices are not Coastal dependent. What has changed to make office space Coastal dependent?

Response to Comment PC243-2

As detailed in Section 3.9, Land Use and Planning of the Draft EIR, The proposed project is consistent with the applicable state, regional, and local land use plans, including the Public Trust Doctrine, California Coastal Act, the Regional Transportation Plan (RTP): 2012-2035 Sustainable Communities Strategy (SCS), City of Redondo Beach General Plan, and the City's Coastal Land Use Plan and the Harbor/Civic Center Specific Plan. The proposed project is consistent with the land use designations and zoning classifications for the project site; therefore, the impact would be less than significant and no mitigation is required. Refer to Table 3.9-1, Summary of Project Site Land Use Plan Designations and Key Development Standards (beginning on page 3.9-9 of the Draft EIR), for details on the key development standards applicable to the project site and the allowed uses on the site. Section 3.9.4.3.2 of the Draft EIR (beginning on page 3.9-28) details the consistency of the proposed office use at the project site. To the extent the commenter is requesting a regulatory consistency analysis of the existing uses/structures, this

request is beyond the scope of CEQA and this EIR (the purpose of which is to analyze and disclose the physical environmental impacts associated with the proposed project). (CEQA Guidelines Section 15126.2.)

Comment PC243-3

I didn't find the total water acreage of the site in the DEIR. Does the 11.6 acres of open space in Chapter 2 Figure 2-7 include any water elements? How many acres of open space in the DEIR Water Front Project site can be attributable to the Horseshoe Pier, Basin 3, New Trailered Boat Launch, Seaside Lagoon and any other water elements in the 36 acre WFP site?

Response to Comment PC243-3

As explained in Section 2.3.2.1 in Chapter 2, Project Description (beginning on page 2-16) of the Draft EIR, and shown on Figure 2-4 (page 2-18), the project site is an approximately 36-acre portion of the waterfront (approximately 31.2 acres is land, including Seaside Lagoon, and 4.8 acres is water area made up of Basin 3 [3.5 acres] and the proposed boat ramp area at Mole C [1.3 acres]). The proposed open space is detailed in Section 2.4.1.5 (page 2-76 of the Draft EIR), and shown on Figure 2-21 (existing open space is shown on Figure 2-7 of the Draft EIR). Both existing and proposed open space were calculated based on the City's Municipal Code for open space in the coastal zone (Sections 10-5.813, 10-5.814, 10-5.815).

Comment PC243-4

Chapter 2 page 2-29 refers to a 2012 structural study/analysis of the South Pier parking structure that was built in 1973. The DEIR states that the Walker Restoration Consultants did the 2012 report a found that this parking structure had another 15 to 20 years of life, if substantial repairs were done. Did the "Walker" report state the estimated cost of these repairs? I could not find this in the DEIR. I made a Public Records Request for this "Walker" report/analysis on January 13, 2016. I don't know, if the "City" can provide the report in time to provide questions and comments to the DEIR, before the January 19, 2016 dead line for public comment. After January 19, 2016, can the "Walker" report's findings, i.e. estimated cost to repair the parking structures, be a part of the DEIR public record?

Does the DEIR provide an Alternative site development plan that considers the restoration of the 1,018 stall South Pier Parking structure built in 1973, the demolition of the 1960's south parking structure and the demolition of the Pier Plaza 70,000 SF Office Complex, and the construction of the 130 room Boutique Hotel on the demolished 1960's south parking site combined with the demolished "octagon" building site? The 22,000 SF of International Boardwalk tenants could possible occupy the ocean front ground level of the restored South Pier Parking structure. Since a new 5 story, 1,157 stall garage is estimated by CenterCal to cost $50,000,000 plus the million's more the "City" would pay for all of the demolition work and roadway, this "Alternative" should be given serious consideration.

Response to Comment PC243-4

The focus of CEQA, and hence the Draft EIR, are environmental impacts and not economics. The Walker Restoration Consultants initial conditions assessment of both the Plaza and Pier Parking Structures in 2012 is part of the referenced documents, and therefore the public record, associated with the Draft EIR. However, reference documents need not be made available for public review. (CEQA Guidelines Section 15148 ["These documents should be cited but not included in the EIR."].) Nevertheless, Chapter 6, References of the Draft EIR (page 6-2) provides a direct weblink to the Walker Reports. In addition, at the City Council meeting on January 19, 2016, the results of a 2015 Conditions Assessment Update (prepared

in January 2016) by Walker Restoration Consultants were presented. Both the 2012 and 2015 Walker reports can be downloaded from the City's website: http://redondo.siretechnologies.com/sirepub/mtgviewer.aspx?meetid=474&doctype=AGENDA for the January 19, 2016 City Council agenda (Item N.3-click on the specific agenda item to pull up the Walker reports). The City also maintains a robust publicly accessible database, which includes staff reports, resolutions, ordinances, minutes, financial reports, etc at: http://laserweb.redondo.org/weblink/Welcome.aspx?dbid=0.

The Draft EIR evaluated an 'infrastructure only' alternative to the proposed project (Alternative 2 - No Project – Necessary Infrastructure Improvements). As detailed n Chapter 4, Analysis of Alternatives of the Draft EIR, under Alternative 2, project components would include improvements reasonably expected to occur in the foreseeable future if the proposed project was not approved. Such improvements would respond to existing infrastructure and public safety needs, which would include replacement in kind of the Pier Parking Structure with possible replacement of buildings on top of the structure. The replacement in kind of some existing development would occur, but the amount of square footage at the project site would remain 219,881 square feet (not including the parking structures) or less if some structures were removed and not replaced. Replacement of the parking structure is appropriate as it analyzes a worst-case scenario.

Comment PC243-5

Chapter 3 page 3.0-6 states that the 50 acre AES site is not part of this DEIR, because any future development is considered speculative. This DEIR's simplistic dealing with the coming future development on the AES site is blindly ignoring the reality that the AES site will be developed.

Why is the new 57 room Shade Hotel not part of this DEIR?

Response to Comment PC243-5

For discussion of the future of AES' property and cumulative projects and impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis.

Comment PC243-6

Chapter 3.1 page 3.1-1 states there is no substantial adverse effect on local valued views, because of the new Main Street and Pacific Avenue reconnection. How does the reconnection of Pacific Avenue substantially eliminate the adverse effects this development will have on local views?

Chapter 3.1 page 3.1-6 states that views from Czulager Park, Seaside Lagoon, Veterans Park, and bike paths have moderate viewer sensitivity, and that views maybe of secondary importance. Further ... automobile drivers have low view sensitivity. Did the experts take into consideration that the vehicles passengers might enjoy the ocean views? What's the value of these beautiful ocean views to Redondo residents?

Chapter 3 Fig. 3.1-7 show an ocean view from the high up viewing platform at the eastern end of Czulager Park. These photos of ocean views are deceptive, because park visitors and picnickers' are generally found in the middle and lower grassy areas of Czulager Park. These middle and lower grassy areas would have significant view blockage from the Water Front Project as it is illustrated in the DEIR?

Chapter 3 Fig. 3.1-5b shows a current ocean view blockage, if a viewer were to stand directly in front of Captain Kid's fish house on Harbor Drive. The "WFP" DEIR would remove Captain Kid's providing a 120' wide ocean view corridor. The DEIR doesn't point out that the 780 linear feet to the north of Captain Kid's is virtually a solid 30' to 45' wall blocking views along the newly completed bike path.

Looking in a northwesterly direction from Veteran's Park the ocean view blockage is significant. Where in Chapter 3 does the DEIR show the Veteran's Park public views being significantly obstructed?

In Chapter 3 the DEIR's use of low, moderate and high sensitivity viewers ... diminishes the value and importance of the ocean views to the general public.

Response to Comment PC243-6

The commenter's opinions are noted. Please see Draft EIR Section 3.1, Aesthetics and Visual Resources for discussion of aesthetics impacts and methodology. Please refer to the Master Response #9: Views and Scale of Development for information on the methodology, heights and views associated with the proposed project.

The commenter mischaracterizes the analysis as presented in Section 3.1. As stated on page 3.1-1 and described in greater detail in Section 3.1.4.5, Pacific Avenue Reconnection and new main streets provide new water viewing opportunities. Contrary to the assertion made by the commenter, this in and of itself does not "substantially eliminate the adverse effects this development will have on local views." See Impact AES-1 beginning on page 3.1-37 for a full analysis of why view impacts were determined to be less than significant. This analysis concludes in part, that as water views would remain available from designated local valued views available to the public, the proposed project would not have a substantial adverse effect. Further, see Section 3.1.4.1.1, which, provides a general overview of the methodology for analyzing impacts to views:

> Whether an alteration of views is "substantial" depends on the extent to which the proposed project may interfere with visual access to visual resources (i.e., the degree to which a view of the Pacific Ocean is lessened/altered).

Regarding view sensitivity, the discussion of viewer sensitive is intended to provide background on how importance placed on views may vary from user group to user group in a general manner. The determination of view impacts is not based on this categorization view groups. See Section 3.1.4.1, which describes the methodology under which the views impacts were determined. Refer to Response to Comment PC246-2 for additional information.

The commenter's disagreement is noted; however, the Draft EIR accurately reflects viewer sensitivity and is supported by the City's experts. The list of the City's technical experts is listed in Chapter 7, List of Preparers of the Draft EIR. For the aesthetics and visual resources analysis, Steve Horton and Katie Owston (both from CDM Smith Inc.) were the lead experts. Mr. Horton has over 33 years of diversified experience in design for a variety of projects, including multi-family land developments; utility design projects; water and wastewater treatment facilities; numerous solid waste design projects; and environmental impact and planning studies. Mr. Horton currently serves as lead 3D graphic artist for CDM Smith, and as such is responsible for most 3D graphics and 3D photograpic composites used at CDM Smith (including both 3D still and animations). Ms. Owston is a planner with more than 13 years of experience in planning, environmental analysis, review and documentation under CEQA and NEPA. While Ms. Owston's experience includes a wide range of environmental disciplines, she has expertise and experience in aesthetics and visual resources analysis.

Regarding views from Czuleger Park, see Master Response #9: Views and Scale of Development. Additionally, see Response to Comment PC323-47.

As clarification, the Draft EIR does not "remove" Captain Kidd's restaurant. The Draft EIR provides an analysis of the project proposed by the project applicant. Regarding views along Harbor Drive, including the area north of Captain Kidd's Restaurant, see the analysis of views on North Harbor Drive - Key

Observation Views 4 and 5 beginning on Page 3.1-44 of the Draft EIR and Master Response #9: Views and Scale of Development.

Regarding Veteran's Park, the most valued views from Veterans Park are of the ocean, straight to the west, which overlook the County beach south of the project boundary and do not include the project site. The project site can be seen in views to the north/northwest of the park, but from most locations under existing conditions is largely obscured by the Redondo Landing and Monstad Pier. The project site is primarily visible from the northeast edge of Veterans Park and would include views of the proposed hotel and replacement parking structure. The proposed parking structure and hotel would have a similar height and similar footprint as the existing Pier Parking Structure and Pier Plaza development, and no substantial changes in the view from Veteran's Park would occur. As shown in the photograph provided below, a narrow view of the ocean is available beyond the Redondo Landing and Pier Plaza development. This would not change under the proposed project. Refer to Response to Comment PC333-7 for additional information.

Photograph PC243-6 - View from sidewalk on Torrance Circle at the northeast edge of Veterans Park

See above regarding viewer sensitivity.

Comment PC243-7

Unfortunately the Water Front Project DEIR process won't yield the best result for the City of Redondo Beach, because everyone who attended the public hearings conducted by CenterCal at the RB Performing Arts Center were never permitted to publicly comment on the Water Front Project that's going through this DEIR process.

Response to Comment PC243-7

Meetings held by CenterCal are not a part of the City's CEQA/Draft EIR process. As with the scoping meeting held for the Notice of Preparation for the Draft EIR (held at the Redondo Beach Performing Arts Center on July 9, 2014), and the three public meetings on the Draft EIR (November 21 and December 9, 2015 and January 9, 2016), the intent was to receive responses from public agencies and the public regarding the Notice of Preparation/Initial Study. CEQA does not require the City to respond to those

responses from the public/public agencies. (CEQA Guidelines Section 15082(b); RBMC Section 10-3.602(e).) A handout (called The Public Meeting Guide), as well as was announced verbally, detailed the purpose of the meeting, the meeting format and ways the public could provide input. As indicated in the meeting guide, as well as announced at the beginning and close of the presentation, staff was available in the foyer of each venue to answer questions about the proposed project, Draft EIR, and CEQA process. All comments received during the Notice of Preparation/scoping process were in Appendix A of the Draft EIR. These comments were considered when preparing the Draft EIR. As for the comments received during the public review of the Draft EIR, the comments and response to comments are provided as part of the Final EIR process.

Comment PC243-8

Also, the City of Redondo Beach handicapped the process by not maintaining the Pier parking structure for the past 40 years, and the "City" never developed a General Plan for the Pier and King Harbor Marina over the last 40 years.

Response to Comment PC243-8

Regarding the Pier Parking Structure, the commenter states an opinion that is outside the purview of an EIR.

See Section 2.1.1.5 in Chapter 2, Project Description and Section 3.9, Land Use and Planning of the Draft EIR, for information on recent planning efforts that have included or focused on the City's harbor area. This includes the City's General Plan, Local Coastal Plan, Harbor/Civic Center Specific Plan, which were substantially amended from 2003 – 2010 and approved by voters under Measure G, and the Harbor/Pier Area Guiding Principles and Harbor Business Enterprise Plan developed in 2006 and 2010 respectively.

Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC243-9

The only way to get the best possible Water Front Project is by reducing the size of the project, save $50,000,000 by repairing the Pier Parking structure, and find a way to make the AES site development part of the overall plan for King Harbor.

[For the photo included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC243-9

Chapter 4, Analysis of Alternatives of the Draft EIR includes an analysis of a reduced project alternative (Alternative 7). For discussion of the future of AES' property and cumulative projects and impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis.

The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC244 ROBIN RIDENOUR

Comment PC244-1

I am totally in support of Saving The Little Pier. Places like this are what our city it all about. I love the atmosphere by the water, and watching the birds and sea life.

Response to Comment PC244-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC245 LISA FALK

Comment PC245-1

Regarding Recommendation for Boat Launch Ramp on Mole A:

The DEIR fails to discuss ANY of the obvious ingress or egress problems connected with tow vehicles and boat trailers.

The maximum length for such a combination in California is 65 feet.

The most likely public entrance for such vehicles is from the east, heading west on Herondo (190th St.). This will necessitate a sharp 90 degree left turn from a single westbound lane to another single southbound lane, then an immediate sharp turn onto another single westbound lane leading towards Mole A - first crossing a two-way bike lane and passing a beach-access parking lot.

Following those turns, accessing Mole A will require two more sharp 90 degree turns and a very tight S turn at a location where bikers, walkers, skateboarders and surfers gather and stand for hours on end to watch the waves and in-water surfers.

While they stand, chat, drink coffee and watch waves or surfers, they completely block the westbound single lane towards Mole A - and often refuse to move - effectively reducing that to a ONE LANE choke-point. I am acutely aware of this, because it is the route I must regularly take to the parking lot by the gate that leads to the dock where my boat is kept.

The DEIR fails to discuss the obvious problems arising from the extremely limited width for such vehicles proceeding on Yacht Club Way towards the alternative boat ramp location on Mole A. For example, at the eastern cement bulkhead on the eastern edge of the King Harbor Marina parking lot, utilized primarily by boaters with slips on King Harbor Marina's Docks G, H, I and J, the curb to curb width of the road is 254 inches. The maximum width of a boat tow vehicle with mirrors is 122 inches. Unless you are going to force the vehicle tires to be against the gutter wall, two such vehicles CANNOT cross. In fact, two regular vehicles often cannot both cross at that point.

If that is to be widened, how many parking spaces for the boaters utilizing those four docks will be removed from the parking lot adjacent the gate leading to docks G, H, I and J? Where are those boaters going to park to access their vessels (approximately 110 vessels)?

The DEIR dismisses Mole B as a possible site for the boat ramp because of the difficulty of ingress and egress for emergency vehicles. Yet there is NO mention of such difficulties when discussing Mole A as an alternative site for the boat ramp. A Redondo Beach fire truck with mirrors is 120 inches wide. If it meets

a tow vehicle and trailer, I seriously doubt those vehicles can cross beside each other on the way into or out of Mole A.

I look forward to understanding how this very limited-space area can be the best location for a boat ramp, in light of the width barriers, road difficulties and parking issues - both for the ramp users (towing vehicles and trailers) and boat owners with slips.

Response to Comment PC245-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A. (See Chapter 4, Analysis of Alternatives - Alternative 8 of the Draft EIR.) CEQA Guidelines Section 15126.6(d) notes that the analysis of alternatives shall be described "in less detail than the significant effects of the project as proposed." Furthermore, CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392.) As outlined in greater detail below, the project would not exacerbate any existing problems, and would result in several safety related improvements in comparison to existing conditions.

The commenter implies that trucks carrying boats to Mole A have a difficult time navigating yacht club way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a through 4-5c, the Alternative 8 – Mole A options include a new 60 foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. The commenter states an opinion/preference relevant to the boat ramp alternative location at Mole A. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A, as well as Mole B. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC246 SHEILA W. LAMB

Comment PC246-1

Traffic Impacts

Section-3.13-TRA-2-Traffic and Transportation

The proposed project would have an adverse effect on the traffic congestion in adjacent public roadways.

Impact: The number of vehicle trips currently generated in the project area as listed in the EIR is 11,838. The proposed project would increase the vehicle trips to 22,234.

1. The vehicle trip measurement was made on weekdays, not weekends when recreational users are most likely to utilize the project area.
2. The vehicle trip measurement for Pacific Coast Highway was measured on weekdays and doesn't accurately measure traffic patterns on weekends when additional traffic is generated.
3. The vehicle trip measurement study radius area included the project area along with adjacent roadways. It was assumed that beyond that radius the traffic would be sufficiently disbursed. However, current poor LOS at the intersection of Aviation & PCH will be severely impacted during both the construction period and operational period.

Recommendation:

1. Trip generation pattern assumptions were influenced by the AECOM 2015 study which projected that 80o/o of sales would be generated by day time workers within a radius of 8-10 miles. Because of this influence, the weekend traffic generation patterns for the project area and adjacent roadways were not considered.
2. Additional weekend traffic generation studies need to be made for the project area and adjacent roadways.
3. The traffic generation study area radius needs to be expanded to include the northern portions of Pacific Coast Highway to Aviation & PCH.

Response to Comment PC246-1

As detailed in Section 3.13, Traffic and Transportation of the Draft EIR, and shown in Table 3.13-11 (on page 3.13-42), the current trip generation from existing uses is 9,684. The proposed project is expected to generate 22,234 trips. Therefore, the proposed project would increase trip generation at the project site by 12,550 vehicle trips.

As for weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

The comment asserts "The traffic generation study area radius needs to be expanded to include the northern portions of Pacific Coast Highway to Aviation & PCH." The Intersection at PCH/Aviation was analyzed in the Draft EIR as Intersection 38. The traffic analysis also included two additional intersections further north (Intersections 39 and 40). The commenter also asserts that impacts to PCH/Aviation (Intersection 38) would be impacted during construction and operations. As discussed on Draft EIR page 3.13-53, "The peak construction activity in combination with Kincaid's would generate fewer daily and peak hour trips than the existing site is estimated to generate." As demonstrated in Draft EIR Table 3.13-12, there is almost a 5-fold decrease in the number of trips during project construction in comparison to existing conditions. (1,895 passenger car equivalent [PCE] construction trips in comparison to the 9,684 existing vehicle trips from current operations.) As shown in Draft EIR Appendix L1, Appendix X.2, Figure 2 (refer to Final EIR Chapter 3, Modifications to the Draft EIR, for an updated figure), approximately 20 percent of the project trips are expected to travel through the PCH/Aviation intersection. This is the equivalent of 1,972.8 trips under existing conditions (9,684 existing trips x20 percent). With a 50-50 split between the north and south construction hauling routes (Figure 3.13-9), the project would result in approximately 947.5 daily PCE trips along PCH, a reduction of more than 50 percent relative to the existing traffic generated by the site. With this substantial reduction in trips, the reduced auto trips will more than offset the temporary increase in truck trips during the construction phase. Consequently, construction traffic impacts were determined to be less than significant. Furthermore, the City has proposed a Condition of Approval (COA) providing for construction related delivery trips during non-peak traffic hours (COA TRA-1 on Draft EIR page 3.13-2).

As also demonstrated in Tables 3.13-14 and 3.13-28, operational impacts to Intersection 38 were determined to be less than significant, and this intersection would continue to operate at level of service (LOS) C, even under cumulative conditions.

Draft EIR Section 3.13.2.2 provided an overview of the selection of the geographic scope of the traffic analysis:

> In consultation with City of Redondo Beach traffic engineers, the study area was initially selected to include intersections most likely to be affected by traffic generated by the proposed project, specifically

major intersections located within roughly a 3,000-foot radius of the project site. However, with follow up consultation.[1] it was determined that additional scope elements, including intersections beyond a 3,000-foot radius should be analyzed so that the study area includes the full extent of the area where potential project-related significant transportation impacts could occur.

The significance conclusions in the Draft EIR confirmed that the City selected the appropriate geographic scope. All of the intersections on the periphery of the traffic analysis (Intersections 8, 28, 40, 41) were determined to be less than significant under existing and cumulative conditions. (See Draft EIR Tables 3.13-14 and 3.13-28.) Vehicles trips to and from the project site disperse as distances increase from the project site, as individuals travel to their specific destinations/origins. Consequently, impacts beyond the boundaries of the traffic analysis would be less than significant.

Comment PC246-2

View Impacts

Section 3.1 AES-I through AES-3 Aesthetics and Visual Resources

The proposed project would have a significant negative effect on local valued views available to the general public.

Impact: The proposed project would substantially degrade the visual character or quality of the site and its surroundings. The Center Cal mall structures block 80% of views along southern Harbor Drive.

Recommendation:

1. In the Draft EIR, viewer sensitivity is defined by how people perceive the visual environment and what they find important. High sensitivity represents viewers who highly value a particular view. Viewer sensitivity is strongly influenced by what the viewer is doing, awareness of their surroundings, values, expatiations and interests they may have. In the Draft EIR, recreational users are characterized as having moderate viewer sensitivity because they experience the natural environment as secondary to their experience. I challenge this categorization. Recreational users need to be recategorized as a highly sensitive viewer group because they put high value on visually seeing the view and experiencing the natural environment.
2. As above, employees and patrons of businesses at the waterfront need to be recategorized as a highly sensitive viewer group. Employees and patrons put a high value on visually seeing the view and experiencing the natural environment. People choose to work and visit businesses that are located at the waterfront because they put a high value on the natural environment. They not only want to visually see it, they want to be surrounded by it.
3. Due to the fact that viewer groups were identified as primarily low to moderately sensitive viewers, the DEIR did not assess the significant view impacts as negatively impacting these groups, especially for views along Harbor Drive and Czuleger Park. The views proposed under the new waterfront development need to be re-evaluated as significant impacts.

Response to Comment PC246-2

Regarding the characterization of recreational viewers' sensitivity, as stated on page 3.1-6 in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, the Draft EIR describes views as a primary attractant to some recreational users and describes those viewers as highly sensitive (emphasis added):

> To this viewer group, views may be of secondary importance or common to the local setting. ***However, some recreational viewers may come to the project area largely or in part because of the views afforded from the site for activities such as walking, photography, or waterfront dining. To this subset of viewers, views may be highly sensitive.***

Regarding the characterization of employees' sensitivity to views, as described on page 3.1-6 in Section 3.1, the Draft EIR describes that views may be appreciated by employees, but as the primary purpose of an employee being at the site is presumably to work, their sensitivity to views is deemed lower that other types of users who may come to the site to recreate or relax. For example, on a foggy day when views may be limited, the employee is likely to still go to work, whereas, other users of the site may choose to wait until day that has better opportunities for a scenic view. As stated on page 3.1-6 in Section 3.1 (emphasis added):

> Employees of businesses are typically more attentive to daily operations associated with their businesses, as opposed to the surrounding landscape. ***They may value a pleasant visual setting but are not at a specific location for the purpose of enjoying the scenery or visual quality of the establishments in which they work.***

Regarding the characterization of business patrons' sensitivity to views, as stated on page 3.1-6 in Section 3.1, views are considered a primarily attractant to some business patrons (emphasis added):

> Similarly, patrons of businesses in the project site may be more attentive to operations associated with the business they are visiting and may not be at a business for the purposes of enjoying the scenery; ***however, some businesses in the project area are designed to capitalize on the available views to patrons (i.e., waterfront dining and harbor cruises); therefore, this viewer group is rated as having moderately high sensitivity.***

Regardless, the discussion of viewer sensitive is intended to provide background on how importance placed on views may vary from user group to user group in a general manner. The determination of view impacts is not based on this categorization view groups. See Section 3.1.4.1, which describes the methodology under which the views impacts were determined.

The commenter's disagreement is noted; however, the Draft EIR accurately reflects viewer sensitivity and is supported by the City's experts. The list of the City's technical experts is listed in Chapter 7, List of Preparers of the Draft EIR. For the aesthetics and visual resources analysis, Steve Horton and Katie Owston (both from CDM Smith Inc.) were the lead experts. Mr. Horton has over 33 years of diversified experience in design for a variety of projects, including multi-family land developments; utility design projects; water and wastewater treatment facilities; numerous solid waste design projects; and environmental impact and planning studies. Mr. Horton currently serves as lead 3D graphic artist for CDM Smith, and as such is responsible for most 3D graphics and 3D photograpic composites used at CDM Smith (including both 3D still and animations). Ms. Owston is a planner with more than 13 years of experience in planning, environmental analysis, review and documentation under CEQA and NEPA. While Ms. Owston's experience includes a wide range of environmental disciplines, she has expertise and experience in aesthetics and visual resources analysis.

Comment PC246-3

<u>Recreation Impacts</u>

<u>Section 3.12 Recreation-REC-1/REC-2</u>

1. The proposed project would construct a recreational facility (Seaside Lagoon) that would have an adverse physical effect on the health of those using the facility.

<u>Impact:</u> Opening the Seaside Lagoon to King Harbor will expose children, youth and adults to the poor

quality of the water in the harbor. In 2014, 25% of the measurements exceeded the E-coli and fecal standards. DEIR 4-119. In addition, there is now a seal barge in the harbor which will add bacteria levels to the water in the harbor.

Recommendation: Maintain the current integrity of the Seaside Lagoon and do not open it to the harbor.

Response to Comment PC246-3

The commenter's opinion is noted. Please see Section 3.8 of the Draft EIR for analysis of water quality, and Section 3.12 for analysis of recreation impacts. Please also refer to the Master Response #4: Modifications to the Seaside Lagoon.

The comment also suggests that the City "maintain the current integrity of the Seaside Lagoon." The Seaside Lagoon cannot maintain its current operating conditions in the foreseeable future. As noted on Draft EIR, beginning on page 3.8-20, the lagoon facility was constructed years before adoption of the Clean Water Act and the establishment of basic water chlorination practices for public swimming facilities. The Seaside Lagoon is subject to swimming water quality standards established by the Los Angeles County Health Department and water discharge regulations set by the LARWQCB through a multi-year Permit (CA0064297). While chlorination and dechlorination functions have been added to the lagoon, the rudimentary elements of the original water system design remain the same. However, compliance with LARWQCB discharge regulations over than last 10 years has been difficult, expensive, with future compliance possibly requiring the installation of a multi-million dollar treatment plant and the acquisition of several acres of harbor area property. Over the years the City has been put in the position of either (1) closing the facility; (2) spending significant capital resources to rehabilitate the facility and implement a contemporary water delivery and filtration system to eliminate discharge into the Harbor; or (3) working with the LARWQCB to modify the lagoon's NPDES Permit to allow for increased water discharge limits. In September 2013, the third and most recent TSO expired. Since the TSO has expired, the lagoon is now subject to the water discharge limits established in the facility's current Five-Year NPDES Permit. To operate the lagoon beyond the 2015 season, a renewal application was filed with the LARWQCB in March 2015, and is currently under review. Given tightening water quality restrictions, it is unknown based on the renewal application filed by the City whether another permit will be granted.

Comment PC246-4

2. The proposed project will have a significant negative effect on the public's ability to have access to recreational facilities in and around King Harbor.

Impact

1. 33% of parkland will be paved over
2. Potential loss of 50% of boating slips
3. Loss of Seaside Lagoon parking lot for public events
4. Loss of Sportfishing Pier.
5. 67 boat trailer spots reduced to 20 spots
6. Reduced surface parking for boaters, swimmers, SUP'ers and kayakers

Recommendation: The proposed development disregards the California Coastal Commission's recommendations for coastal public recreational spaces. The DEIR needs to show the negative impacts the development will have on recreational users per the CCC's guidelines:

Response to Comment PC246-4

As described in Section 3.12, Recreation of the Draft EIR, impacts to recreation were determined to have a less than significant impact. For issues related to Seaside Lagoon, including a change in size and use of the lagoon for public events please see Master Response #4: Modifications of Seaside Lagoon.

Regarding the potential reduction in boat slips, the slips being considered for the reconstructed marina would vary in size and range in number from 33-slips and eight side-ties (approximately 1,740 linear feet of space) to a maximum of 60-slips and eight side-ties (approximately 2,200 linear feet of space). As shown on Figure 2-16 in Chapter 2, Project Description of the Draft EIR, the marina option with fewer slips would have larger slips that accommodate larger vessels. Under this option, there would be one 24-foot slip and the remainder would vary from 30 feet in length to 65 feet in length. Under the marina option with a larger number of slips, 40 slips (approximately 67 percent) would be 22 feet in length, and the remainder would vary from 24 feet to 65 feet (each marina option also includes a side tie that is 100 feet in length to accommodate the Voyager or similar type of tour boat, and the other side ties would accommodate smaller vessels). The marina option that is implemented would be based on market demand for slip sizes in the harbor at the time the proposed project has gone through final design. Based on vacancy data collected in May 2015, over 90 percent of the vacant slips were small sizes (27 or 25 feet) which indicates that currently there is a greater demand for larger slip sizes, and therefore, the marina design with a fewer number of slips may ultimately better meet demand.

Regarding the Sportfishing Pier, see Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Regarding parking for recreational users, see Master Response #7: Waterfront Parking.

As detailed in Section 3.12, Recreation of the Draft EIR, upon completion of construction, operation of the proposed project would result in a beneficial impact relative to improved recreational facilities. The proposed project would not result in a substantial physical deterioration of existing parks and recreational facilities. The proposed project does not include the construction or expansion of recreational facilities that might have an adverse physical effect on the environment not already addressed as part of the project. Therefore, impacts on recreation from the implementation of the proposed project would be less than significant.

As for the commenter's claim that the proposed development disregards the California Coastal Commission's recommendations and guidelines for coastal public recreational spaces, it is not clear to which specific Coastal Commission recommendations or guidelines the commenter is referring. As discussed in Section 3.9, Land Use and Planning of the Draft EIR, implementation of Coastal Act policies is accomplished through the City's certified Local Coastal Plan (LCP), which was reviewed and approved by the City Council, California Coastal Commission, and the voters of Redondo Beach (Measure G). The Coastal Act requires all cities and counties along the California coast to prepare an LCP for the portion of their jurisdiction that falls within the coastal zone. The LCP must reflect the coastal issues and concerns of its specific area, and be consistent with the overall statewide goals, objectives, and policies of the Coastal Act. As discussed in Section 3.9, the proposed project is consistent with the City's certified LCP, and therefore, it is consistent with the California Coastal Act.

Comment PC246-5

Cultural Impacts
Section 3.4 Cultural Resources
Implementation of the proposed project would ·result in the demolition of the Redondo Sportfishing Pier. This would constitute a significant adverse impact to an historical resource as defined by CEQA.
Impact: Mitigation efforts MMCUL-1 and MMCUL-2 would create historical documentation and

interpretive programs related to the Sportfishing Pier. These efforts are not sufficient to remedy the adverse impact of the proposed project because the mitigation does not insure the structural integrity of the cultural resource, ie., the Sportfishing Pier. The Sportfishing Pier (built 1969) is an Historical Resource under CEQA and the structural destruction of this historical resource would have a negative impact on the cultural history of King Harbor.

Recommendation: Because of its historical significance of the Sportfishing Pier to the cultural history of King Harbor, the recommendation is to insure the structural integrity of the Sportfishing Pier.

Response to Comment PC246-5

Refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on existing businesses. The Draft EIR's cultural resource chapter (Section 3.4) determined that the Sportfishing Pier was a historic resource and disclosed that its demolition would result in a significant impact; please see Draft EIR pages 3.4-51 through 52. As also discussed on Draft EIR pages 3.4-65 through 66, preservation of the existing Sportfishing Pier is not considered feasible given the poor conditions of the structure, and historic resource impacts are considered significant and unavoidable. The new structure would be constructed of concrete instead of wood (which would reduce fire concerns that timber/wood structures inherently have, as well as provide for reduced maintenance over the life of the structure, consistent with the project objectives of providing for the repair and replacement of obsolete infrastructure) and would not be able to preserve or replicate the original historic resource. The comment is acknowledged and these comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC247 MIKE & SUE MORGAN

Comment PC247-1

Regardless of one's position on the CenterCal project in general, I can't imagine there is anyone that does not supporting rebuilding our "Little Pier." The Fishing Pier is a Redondo landmark. It's an essential piece of what Redondo Beach has been and NEEDS to continue to be - a harbor town that provides activities one can only find in a harbor: sportfishing, whale watching, sightseeing, and a great place to dine and enjoy the ocean environment. If the harbor loses the Fishing Pier in the process of "revitalization" it will have lost an integral piece of its soul. We cannot let that happen.

Response to Comment PC247-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC248 ERIKA SNOW ROBINSON

Comment PC248-1

I've written before, but I just want to make sure my comments are heard and recorded. I support the Waterfront wholeheartedly - and I'd love to make sure that the staples of our Waterfront - Naja's, Quality, Capn Kidds, r10, Slip, Tony's ⟨ESP Tonys⟩ are all going to be included and incorporated, which I know y'all & CenterCal plan on doing.

Also, PLEASE keep Polly's on the Pier and the pier that it's on, in the design - if it has to be re-done, great, but PLEASE keep it! I feel it's an integral part of our community! It's the PERFECT place to grab

some breakfast after paddle boarding, not to mention it's a RB ICON! ⟨and we don't really have that many!⟩

Lastly, and I know this may be a big one, but PLEASE PLEASE PLEASE find a way to work with our artists ⟨of which I am one⟩ and our RBAG ⟨redondo beach art group⟩ to KEEP the tiled Ocean Steps. I helped with those, but more importantly the artists that did those ⟨Patti Linnett and Debbie Collette⟩ worked an entire summer to bring those to our community and they're SO beautiful! I know for a fact that they are on plywood panels. Not sure how easy they'd be to relocate, but if they're going to be demolished, the least we can do is try and save them and incorporate them, perhaps in the market hall wall or steps?

thanks for all y'all are doing - and I look forward to a revitalized downtown - and INCORPORATE AS MUCH ART AS YOU CAN EVERYWHERE!

Response to Comment PC248-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. Related to the Ocean Steps, Section 3.1, Aesthetics and Visual Resources of the Draft EIR addresses public art, including the Ocean Steps (page 3.1-22). As noted on page 3.1-60 of the Draft EIR, the construction of the new bicycle path and Pacific Avenue Reconnection would require the replacement of the Ocean Steps. Please also see Draft EIR pages 3.4-27 and 3.4-53 through 3.4-55 for additional analysis of cultural resource and the ocean steps. The applicant will work with the Redondo Beach Public Arts Commission to establish a similar feature to the Ocean Steps tiles on the new stairway.

The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC249 SUSAN COONY

Comment PC249-1

Having lived in Hermosa for 50 years, my very favorite place to eat, bring family + guests + just enjoy in all of Hermosa + Redondo is "Polly's on the Pier". I would be very sad to lose it to redevelopment. I'm all for progress + making good use of the fabulous real estate + tax possibilities, but I would really hate to lose the tiny part of the marina that feels like it's for me, the average resident. Please protect or ensure a piece where "locals" can easily park + walk to a not-to-expensive oceanfront, on the-water place to eat. Redondo Pier is too big for me to walk (I am older + disabled.) Hermosa is difficult to find close-parking in also. I can always count on Polly's. (Not to mention the people, the service + the food!)

Response to Comment PC249-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC250 APRIL PITCAIRN

Comment PC250-1

I support the Waterfront, however I would like all of the concerns Mark Hansen brought up in the DEIR addressed.

Response to Comment PC250-1

Refer to Response to Comments PC425 for responses to Mark Hansen's comments. The commenter states an opinion and does not introduce new environmental information or directly challenge the information presented in the Draft EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC251 ELISABETH DIELS

Comment PC251-1

I fully support the drastically needed redevelopment of "Our" Waterfront.

I say "Our", because it's not for the use of only the very negative residents who live in proximity of "Our" jewel (NIMBY's who are against the draw of more people wanting to come down to "Our" Waterfront and have access to the coast) but in the hands of "Our" children who will truly be the benefactors of this redevelopment in their lifetime.

For my family (and my 7 year old son who will grow up to enjoy "Our" Waterfront) I am in support of the drastically needed redevelopment of OUR Waterfront.

Response to Comment PC251-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC252 BOB & EMMA WILLIAMS

Comment PC252-1

"Help Save Our Little Pier" article in Easy Reader.

You may enjoy some photos I took after breakfast one morning at Polly's.

Good luck with the "save the pier" campaign.

[A website was provided and the photos downloaded. Please refer to the PDF of the comment letter in Volume II of the Final EIR for the photos]

Response to Comment PC252-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC253 DIANA MANN

Comment PC253-1

Please add my comments to the public record.

I wish to call your attention to the areas of the EIR that cause great concern to us, the residents of The Village, next door neighbors to this project.

In section 3.13 Traffic and Transportation in the Draft EIR it states:

The proposed project is expected to generate a total of 22,234 daily trips (763 AM peak hour trips and 1,475 PM peak hour trips) for a net new of 12,550 daily trips associated with the proposed project.

The report further states in Air Quality section 3.2-12 that since the increased vehicle volume is below a screening threshold of 24,000 cars per hour that this increase will have no significant impact on air quality.

I am not sure where such a threshold comes from or why that has any bearing on this project. How can the addition of 12,550 vehicles per day not have an impact on air quality?

I know we are moving toward cleaner cars but not everyone owns a Tesla or Prius yet. Even after mitigation measures are implemented, there will still be toxic emissions.

And we, the next door neighbors, the residents of The Village have the privilege of breathing in those fumes on a daily basis. How is this not a health hazard?

Response to Comment PC253-1

The Draft EIR recognizes that there will be air quality emissions with respect to the additional vehicles, however as demonstrated in the analysis, these impacts were found to be less than significant. Because these emissions are below significant levels, they are not anticipated to result in significant health hazards to local residents. With respect to the 24,000 vehicle per hour threshold's origin, as discussed in the methodology section of the Draft EIR (Section 3.2.4.1, pages 3.2-24 and 28) this threshold is based on the Bay Area Air Quality Management District's thresholds for carbon monoxide (CO) hotspots. The hourly vehicle thresholds in conjunction with compliance with local congestion management plans are a more conservative way to analyze localized impacts from CO emissions than the previous analysis, which relied on level of service (LOS) levels. This is because vehicles have become more efficient and cleaner and therefore can idle longer at intersections before threshold levels are reached (many newer cars even cease idling while at a complete stop). The thresholds are used to determine if the impacts to air quality will be significant and, specific to the CO threshold of 24,000 vehicles per hour, have the potential to have significant health impacts on local populations. The threshold identifies the number of vehicles per hour using worst-case conditions (where air movement is limited) that, if exceeded, could have the potential to exceed the state standards of 20 ppm for a 1 hour average and 9 ppm for an 8 hour average. Therefore, if the hourly vehicles are below 24,000 vehicles a project would not have the potential to exceed state standards and therefore would not represent a significant impact to the health of local residents or air quality with respect to CO.

In addition, the analysis as discussed in Section 3.2.4.5 (Impact Determination, page 3.2-38 *Violation of Air Quality Standards – Operation*) includes the potential impact to the regional air quality from mobile sources. This includes the 12,550 vehicles per day. As shown in Table 3.2-10 *Proposed Project Unmitigated Operational Emissions*, criteria pollutant emissions from all operational sources (including motor vehicle use) would not exceed the established SCAQMD thresholds. However, the Draft EIR did conclude there would be significant and unavoidable air quality impacts associated with construction activities. See Section 3.2.4.5 for additional details.

Comment PC253-2

<u>On noise pollution:</u>

As stated in ES 7.2.4, NOISE NO1-3. of the report:

Implementation of the proposed project would cause a substantial permanent increase in ambient noise levels in the project vicinity (i.e. Torrance Circle/Boulevard between Catalina Avenue and the project site)

above levels existing without the project and in excess of the city's standards.

No feasible or additional feasible mitigation measures are available that would avoid all the potential impacts or reduce all impacts to less than significant levels. ***Therefore, potential impacts to these resource areas are considered significant and unavoidable.***

Consider the morning and evening commuters who will use this road to bypass the back-up at PCH and 190th (and don't think they won't), the morning truck deliveries to all the added restaurants, the evening traffic for the movies that let out, and my own personal favorites, the motorcyclists and motor bike clubs out for their weekend rides along the ocean. Noise levels will have a significant impact on the lives of the residents here.

The residents of the Village will be the most impacted by this road. Many of these condos were built during the 70s without air conditioning because it was a feature of them to "enjoy the ocean breezes" and, until recently, the afternoon breezes were indeed enough to cool down the units. We will no longer have the use of our windows for air at all, if we have to keep them closed all the time in order to keep out road noise. Furthermore, our own CC&Rs do not permit us to install air conditioning. One resident was recently denied the use of a portable unit to put on her balcony due to the noise it would generate. We will suffocate in here in the summer months.

Response to Comment PC253-2

The future traffic volumes used to evaluate project-related changes in roadway noise levels are based on a traffic model that takes into account projected traffic congestion areas and the potential for motorists to use alternative routes. Please see Draft EIR Section 3.13, Traffic and Transportation, page 3.13-43 and Appendix L1, pages 11 and 43 for additional discussion of the trip distribution calculations. The Draft EIR analysis of potential changes in roadway noise levels on the street segment noted in the comment, specifically, Torrance Circle/Boulevard between Catalina Avenue and the project site, is based on changes in traffic volumes compared to existing conditions. It is not anticipated that there would be a substantial change in the vehicle mix (i.e., mix of passenger cars, trucks, and motorcycles) due to the project, with the vast majority of vehicles continuing to be passenger cars).

While there would be a significant roadway noise impact referenced, which reflects the anticipated increase over existing ambient noise levels along the subject roadway segment; the resultant noise level of 64.4/64.5 dB CNEL would still be within the range of what is considered to be normally acceptable for residential uses (i.e., less than 65 dB CNEL).

Comment PC253-3

<u>On congestion:</u>

After living here for only a few years we are already seeking alternative routes to find our way to the freeway in order to avoid the back-up at PCH and 190th This will worsen if the proposed development remains at the scale being shown to us today.

Note: the **voters of Redondo Beach voted against Measure A,** rejecting a zoning change of the AES power plant site, so that the addition of 600 new condos would not impact the congestion in this area. What is being suggested here is even worse. Our city officials are apparently so invested in this project that they have not heard the message that the citizens of our city sent them when that initiative failed.

Response to Comment PC253-3

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. In

addition, Section 3.13, Traffic and Transportation of the Draft EIR and Appendix X-6 Caltrans Analysis of Appendix L1 of the Draft EIR detail the impacts of the proposed project on the freeway mainline roadways as well as ramp queuing and intersections. Please also see Draft EIR Chapter 2, Project Description, Section 2.1.1.5.8, which provides an overview of the zoning history for the project site, which included voter approval of Measure G in 2010.

Comment PC253-4

Please listen: WE DO NOT WANT THIS ADDED CONGESTION, AIR AND NOISE POLLUTION IN OUR BACKYARD.

Response to Comment PC253-4

Please see Response to Comments PC253-1 through 4 for detailed responses regarding traffic, air quality and noise.

COMMENT LETTER NO. PC254 ANDY & ANN CHORBI

Comment PC254-1

I'm a senior resident of Redondo Beach and I enjoy the 'low key' atmosphere in Redondo Beach very much....

In fact it's getting to be built up quite alot already down by the waterfront.....Enough I think for the limited parking and road conditions with the bikes taking over most of the roads down there.....I especially like 'the little pier' by Polly's one of my family's favorite breakfast places.....

I don't understand WHY we have to compete with other cities like Manhattan Beach and Santa Monica.....places I don't even want to travel to BECAUSE they are SO CROWDED.....it's not fun.....at all finding parking and then walking around with so many people....

I like how Hermosa Beach closed off to autos the lower part of Pier Ave.....there are lots of people, but it's safe and fun to walk around.....

But with more projects planned for Redondo Beach to 'make money'.....it's going to turn into a failure because it will be too congested for people to enjoy and spend money.....There will be 2-3 hotels, isn't that enough?

People want to 'get away' from hustle and bustle and that's why they'll come to Redondo Beach.....instead of the other's I listed above.....

Please keep the 'laid back' atmosphere.....and please keep it in good shape for all to enjoy and relax....

My son has a small boat at King's Harbor and he hopes it stays the same as it is.....He lives in Torrance.

Response to Comment PC254-1

Please see Draft EIR Section 3.13 for discussion of transportation, including motorists, bicyclists, pedestrians, and parking. Please also refer to the Master Response #5: Sportfishing Pier, Polly’s and Sportfishing. The commenter has provided general information that does not introduce new environmental information or directly challenge the information presented in the Draft EIR. However, your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC255 PATTI BROWN

Comment PC255-1

I understand the need for revitalization. But there are certain aspects of our waterfront that keep history and quaintness alive. I speak of Polly's and the sport fishing location on the little pier. This is exactly the type of locale I search for when I travel, be it in the United States or overseas. You cannot beat charm and the genuine, old fashioned friendliness that attracts so many. I am so worried we will have our hometown turn into an over inflated mall, for lack of a better word. Yes, updates on just not so grand a scale. Keep part of our local lore and homeyness. I believe those of us who live here and contribute to Redondo deserve some say.

Response to Comment PC255-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC256 JOANNE NEWMAN

Comment PC256-1

I noticed the email address I used for you when sending this originally was not exactly as was shown in the information we were given as to where to send our comments on the DEIR. Please use this copy as tho is were my original. Thanks you.

Was the addition of the many trash trucks which will be necessary to service this bloated Project included in the traffic study? If so how could the conclusion be reached that there would be no impact on traffic? They will surely increase the noise levels, the pollution levels, and the number of vehicle trips into the area and into the Project daily / weekly. These vehicles whether in or out of the Project and / or while within the Project itself certainly should be taken into account or was that considered not important enough to be included???? Fortunately the EIR is only a draft EIR. Perhaps it's time to go back to the drawing board?

Response to Comment PC256-1

Please refer to your previous comment dated January 13, 2016, Response to Comment PC219 above. For a summary of the traffic analysis, please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As noted therein, the project determined there would be several significantly impacted intersections, which would be mitigated to less than significant with implementation of the proposed mitigation measures. Please also see Response to Comment PC203-1, which discusses the project's trip generation assumptions. The project trips from the transportation analysis were considered in both the air quality analysis (see Draft EIR page 3.2-23), and the noise analysis (see Draft EIR Section 3.10-22 of Section 3.10, Noise).

COMMENT LETTER NO. PC257 JOANNE NEWMAN

Comment PC257-1

Here again the email address I used for you when sending this original transmission of this email was not exactly as was shown in the information we were given at to where to send our DEIR comments. Please use this as my official email comments on the DEIR. Thanks you

What provisions have been made for emergency vehicles getting into, out of and around while within the Project? Was that included in the traffic study or is that something that was neither considered.....or was left out on purpose.....or not considered important enough to be included in the analysis? To me it certainly should be of the utmost important to be considered. Any time delays in the emergency vehicles getting into, around or out of the Project could cost someone their life!!!!! This definitely is an issue that must be visited if it has not been done so. Again it is fortunate that this a Draft EIR as the egregious flaws in many areas of the traffic analysis need to be corrected.

Response to Comment PC257-1

Emergency access and provisions associated with the proposed project was detailed in Section 3.11, Public Services of the Draft EIR. As detailed throughout Section 3.11, Public Services of the Draft EIR, in addition to a relocated Pier Sub-Station (the police sub-station currently located at the site), the proposed project would include on-site private security and security measures to increase site safety, including architectural design (e.g., placement of doors, windows, and staircases to minimize blind spots) nighttime security lighting, security cameras, and providing lighted landscaping that allow for clear sight lines by security personnel and security devices to monitor the site. With the proposed project, the security is anticipated to be better than under existing conditions.

As for fire protection/emergency services, as detailed in Section 3.11, the Redondo Beach Fire Department would be able to accommodate the proposed project without the provision of additional staffing and facilities and no construction of new or physically altered fire protection facilities (i.e., fire stations) would occur. In addition, the proposed project would remove old and non-compliant buildings and replace them with ones that meet all applicable current state and local codes and ordinances related to fire protection. As also discussed in Section 3.13.2.3.5 “vehicular circulation through the project site [under existing conditions] is limited to the disconnected nature of the north and south areas of the Harbor….This inhibits emergency vehicle and public transportation access.” The proposed project includes the Pacific Avenue Reconnection and a new main street (in the northern portion of the site), which would improve fire/emergency access and protection service throughout the project site.

As also noted in Draft EIR Section 3.13.3.7, during construction in rights of way, there are existing regulations for coordination with local emergency services, including training for flagman for emergency vehicles traveling through the work zones, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. While construction traffic impacts were determined to be less than significant in Section 3.13, the City has also proposed, as a standard condition of approval, a requirement to coordinate and ensure emergency access during construction activities. (See Draft EIR pages 3.13-53 through 54.)

The timing, potential, and routing for emergency vehicle trips is difficult to discern and is not predicted to occur on a regular or frequent basis. Such trips are also not required to obey traffic controls, may bypass traffic queues by crossing over the double-yellow line so are able to avoid congestion.

Additionally, these are not typical reoccurring daily activities. Per typical traffic engineering practice and Redondo Beach requirements, the assessment of the project’s potential to impact traffic is analyzed for typical traffic on weekday morning and evening peak periods. Therefore, these activities are appropriately not explicitly analyzed in the traffic analysis.

The commenter also suggests that emergency vehicle trips be included in the vehicular traffic analysis. As noted in Response to Comment PC203-1, the trip generation for the project site is based upon the typical trip generation from similar types of developments. As noted further noted in Draft EIR Appendix L1, page 11, the trip generation assumptions and model methodologies are conservative and overestimate of trips by approximately 4 percent on average compared with empirically collected traffic counts at mixed

use development sites used to validate the mixed-use trip generation model, so additional trip generation to account for infrequent emergency vehicle trips is not necessary as the trip generation analysis likely includes an overestimation of trip generation (22,234 daily trips) of around 4 percent. (See also *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 [Rejecting argument "that the EIR should have specified whether trucks sometimes enter and leave the site "unevenly" over time. We hold that such minute detail was not required in the analysis in question."]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 563, 578 [Traffic analysis was not required to analyze increased arena attendance which was only projected to occur 0.3 percent of the time.].)

COMMENT LETTER NO. PC258 PRATIK BASU

Comment PC258-1

This is a note in support of the wonderful Polly's on the Pier.

My wife and I have lived here in the South Bay for over a decade and have enjoyed our visits to Polly's. In an age of trendy establishments that seem to come and go with alarming regularity, it's nice to know that long-standing places with deep community ties still exist. Polly is a perfect example of this.

Please do not hesitate to contact me if you have any questions or need any more information.

Thank you for your time.

Response to Comment PC258-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC259 JONATHAN NOOK

Comment PC259-1

We are very much opposed to the "reconnection" of Pacific Avenue as CenterCal calls it.

It isn't like it's been disconnected in the recent past, so CenterCal's description is a bit inaccurate.

There is no reason that the proposed hotel cannot be accessed from the Torrance Blvd. side without adding this new thoroughfare 'Pacific Avenue'. Why expose all the pedestrian traffic to yet another roadway?

Every other project like this, that we've seen created in the last couple of decades, removed roadways instead of adding new ones. Hermosa Beach Promenade, Santa Monica Promenade, for example.

When I questioned CenterCal's Fred Bruning about the need for an additional roadway, he told me that many people would not walk from one side of the project to the other and would need to drive instead, which is preposterous.

All in all, we are for the project, but not for additional roadways.

Response to Comment PC259-1

Although Pacific Avenue may not have been disconnected in the recent past, it was disconnected and in fact, until the 1970s, the public was able to travel to the waterfront via Pacific Avenue, El Paseo, Harbor

Drive and various other streets (see Figure 2-2, page 2-7 of the Draft EIR, which shows a map of the City from 1927 including the former configuration of Pacific Avenue and other waterfront roadway connections). Therefore, the Pacific Avenue Reconnection would be a reconnection of the roadway access that once served to provide public access and connectivity along the coastline.

Section 3.13, Traffic and Transportation of the Draft EIR, detailed bicycle and pedestrian safety related to the proposed project. The Impact TRA-3 analysis (beginning on page 3.13-80 of the Draft EIR) addressed the potential to impact pedestrian and bicycle facilities and conditions and found that overall, implementation of the proposed project would enhance both existing and planned pedestrian and bicycle facilities through and adjacent to the project site. While the project will introduce new vehicular crossing locations for pedestrian associated with the Pacific Avenue Reconnection, and additional driveway locations on Harbor Drive, these crossing locations would be designed to applicable standards, such as high visibility crosswalk markings at all crossing locations, and raised crosswalks (where feasible). Based on the discussion in Section 3.13 of the Draft EIR, the proposed project: (1) would not disrupt existing or planned pedestrian or bicycle facilities; (2) would provide for pedestrian, bicycle, and roadway facilities that are designed with applicable design standards; and (3) would not substantially increase hazards due to design features or incompatible uses. The proposed project would improve bicycle and pedestrian connections throughout the site, especially by eliminating the pathway through the Pier Parking Structure and the associated bicycle/vehicular interactions (Table 2-2, page 2-46 of the Draft EIR). As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact pedestrian and bicycle modes. As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact pedestrian and bicycle modes.

As described throughout the Draft EIR, the Pacific Avenue Reconnection would enhance circulation at the project site by providing public access and connectivity along the coastline. This roadway would also greatly improve emergency access and protection service throughout the project site (refer to Section 3.11, Public Services of the Draft EIR for additional information).

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC260 JOANN TREDICK

Comment PC260-1

As a concerned resident of Seascape II, I would appreciate an understanding of how a two- lane street (N. Harbor Drive and Pacific Avenue) are going to handle the increased traffic. How will we be able to access our homes without waiting in line as we do for the 4th of July, The Christmas Boat Parade, and sunny days during the summer months, just to mention a few examples?

Response to Comment PC260-1

The proposed project includes the Pacific Avenue Reconnection. The reconnection of this north/south roadway through the project site would mean that traffic currently traveling along Catalina Avenue could use the reconnected portion of Pacific Avenue to connect between Harbor Drive and Torrance Circle. Please see Draft EIR Section 3.13 and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, for discussion of traffic methodology, impacts, and the proposed traffic mitigation measures.

Comment PC260-2

How long will the development/construction take to complete in front of my home? We were informed that the total project will take 2 to 4 years. That sounds like a lot of sacrificing on my part.

Response to Comment PC260-2

As detailed in Section 2.5 in Chapter 2, Project Description of the Draft EIR (beginning on page 2-78), construction of the proposed project would commence in 2017 and is anticipated to extend for approximately 27 to 30 months (2.25 to 2.5 years), from January 2017 through June 2019. Although the Draft EIR analyses were based on a conservative daily/peak of many of the construction activities occurring simultaneously, construction within the approximately 36 acre site would vary from day to day. Additional details on timing of various project elements can be found in Table 2-8 (beginning on page 2-85 of the Draft EIR).

In addition, in Chapter 4, Analysis of Alternatives of the Draft EIR, an alternative (Alternative 6: Alternative Construction Phasing) was analyzed that included the overall amount and type of development on the site similar to the proposed project; however, this alternative would occur in phases over a longer period of time.

Comment PC260-3

I realize that the Pier and Parking Structures are in great need of renovation. And I am all for it, provided it is done properly and with the human factor taken into consideration.

It seems to me that the project as it is now planned, will be done at the cost of the residents. We may go to the theatre occasionally; the same with the farmers market and fish market; the hotel is of no use for us.

Response to Comment PC260-3

The comments do not address an environmental issue. However, your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC261 LINDA MOREY

Comment PC261-1

I was very distressed when I saw that the "Little Pier" was under siege. Polly's is a special local spot for breakfast where you may glimpse a Garibaldi while waiting for your turn at an outside table. It's a perfect place to catch a boat for a whale watching adventure. Families love it for a fishing experience. It's part of our history and heritage. We can't lose it!!!!!!

Response to Comment PC261-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC262 ANITA CAPLAN

Comment PC262-1

I like the idea of improving the waterfront but I think the proposal is too grand. I think every change needs

to improve the enjoyment of the water and the pier. An inside shopping mall is not relevant to such enjoyment.

When I grew up in Redondo in the 40s and the 50s Redondo had an amusement park with a carousel, kiddie rides, and lots of beach type attractions. The pier, parking structure and international boardwalk certainly need to be updated but I do not think that a shopping mall is the way to go.

I also will vote against any project that diminishes the already too small view of the ocean that we have. The "Village" was the worst thing that happened to Redondo. Don't make it worse.

Response to Comment PC262-1

To clarify, the proposed redevelopment of the project site is not an inside shopping mall but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment (RDE) component that has enhanced public open spaces and recreational opportunities unique to the waterfront. In fact, as analyzed, the project includes more restaurant, including a public market hall, than retail. Also included is coastal-related services, such as (but not limited to) marine-related commercial recreation businesses (e.g., charter boats and marine-recreation equipment rentals), the Seaside Lagoon, and a small craft boat launch ramp facility. Refer to Master Response #9: Views and Scale of Development regarding the scale of development and Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site regarding the compatibility of proposed development.

The commenter states an opinion/preference relevant to the project approval. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC263 MEGAN SULLAWAY

Comment PC263-1

I am strongly opposed to the CenterCal development and have several comments on the DEIR.

I am attaching a letter with these comments.

I am a resident of Redondo Beach (90277)

Comments on WATERFRONT DRAFT EIR

I am **strongly** opposed to Center Cal's plans for the Redondo Beach waterfront area. I have lived in Redondo Beach since1990, and have lived near the Pacific Ocean my entire life.

There are several MAJOR problems with the Center Cal plan as reflected in the EIR.

1. <u>Loss of public access to and enjoyment of the ocean.</u>

Redondo Beach is one of only two harbors on the Santa Monica Bay. Currently, it allows local residents and the general public full advantage of the ocean (sailing, sportfishing, paddle boarding, kayaking, swimming; a "Seaside Lagoon" which allows families with small children to safely swim, etc.).

All this would be severely curtailed or lost if the CenterCal project goes thru.

- The DEIR plan paves over 1/3 of Seaside Lagoon public park for a road and retail/restaurant lease spaces, fills in the pool, and removes the children's fountain and slide.
- Seaside Lagoon had 81,000 day guests last year; 600 kids attended day camps there. It is currently easily accessed.

- The DEIR plan creates a situation in which families have to park & take their kids thru a parking structure, through shopping and restaurants and across an active road JUST TO ACCESS THE LAGOON, which will have far fewer of its current attractions.
- There are only two public parks in the harbor. The Center Cal plan will impact both, paving over 1/3 the Lagoon, and totally cover Moonstone Park. This negatively impacts (among others) the outrigger canoe club.
- AND: the DEIR plan makes the sport fishing pier optional!

Response to Comment PC263-1

Please refer to the Master Response #4: Modifications to the Seaside Lagoon regarding your comments on Seaside Lagoon. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding the Sportfishing Pier. To clarify, the commenter incorrectly notes that the Moonstone Park would be totally covered. Moonstone Park is on Mole B and not part of the project site; therefore, no impacts associated with the proposed project would occur to Moonstone Park.

Comment PC263-2

2. Contaminated Water

- Once Seaside Lagoon is partially filled in, it becomes very similar in structure to Marina del Rey and Cabrillo Beaches – both of which have to be shut down regularly for violations of fecal coliform levels.
- The City of Redondo has not tested the water quality anywhere in the harbor!
- The DEIR changes will allow fuel and other marine pollutants (that currently do not reach Seaside Lagoon) to contaminate it. It is likely that California sea lions will take up residence on the swimming and boat-launch beach, fouling the water and beach (as is currently the case in La Jolla, California).

Response to Comment PC263-2

Refer to Section 3.8, Hydrology and Water Quality of the Draft EIR for the detailed on water quality associated with the project site. Section 3.8 addresses water quality within Santa Monica Bay, which is generally representative of the water quality within the harbor, in particular the area near the mouth of harbor which is subject to frequent flushing as described beginning on page 3.8-12. Water quality testing is currently performed at locations within the bay, including at monitoring station SMB 6-2, which is located 50 yards south of the Horseshoe Pier. As stated on page 3.8-11, the data shows that approximately 25 percent of the indicator bacteria data from King Harbor in 2014 exceeded the water quality objectives for *Enterococcus*, *Fecal Coliform*, and *Total Coliform* single sample limits. Of these violations, 25 to 43 percent occurred during the dry season suggesting that exceedances occur year-round and only slightly more frequently during the wet season. It should be noted that SMB 6-2 is located near a storm drain outfall, which is a possible source of the indicator bacteria.

As discussed on page 3.8-62, the lagoon beach would be tested for total coliform, fecal coliform, enterococci, and streptococci bacteria as required under Assembly Bill 411. This may include weekly testing during the summer months. In the unlikely event that violations occur, notices would be posted until testing indicate that levels are below state standards.

Additionally, see Master Response #4: Modifications to the Seaside Lagoon regarding existing water quality, water quality under the proposed project, the differences between Seaside Lagoon and Cabrillo Beach and Mother's Beach, and unlikelihood of sea lions establishing a presence at Seaside Lagoon.

Comment PC263-3

3. Decreased Public Safety

- In addition to the contamination concerns listed above, CenterCal is proposing to put automobile-launch lanes for trailerable boats near the modified lagoon. This means that children, swimmers, kayakers, stand-up paddleboarders, power- and sail boats will all be together, sharing a relatively small space. This area is already the turning basin for King Harbor, where all of the commercial fishing, whale-watching and sailboat charters navigate to get in and out of the harbor. It is inevitable that collisions, causing injury or death, will occur.
- According to the EIR consultant, no lifeguards are planned for the Seaside Lagoon's entry area into the harbor. (As it is not a County beach, the County will not be providing lifeguards).

Response to Comment PC263-3

Regarding safety related to the small craft boat ramp and the modified Seaside Lagoon, please see Response to Comment PC002-1 and Master Response #4: Modifications to the Seaside Lagoon. The plan includes life safety support (such as a lifeguard) stationed at the Seaside Lagoon.

Comment PC263-4

4. Ecological concerns

- The Redondo Beach Waterfront is home to several protected species (great blue herons, humpback whales, California brown pelicans). The DEIR does not cover the needs of these protected species and, in fact, fails to qualify the great blue heron as a protected species.

Response to Comment PC263-4

Please see the detailed analysis in Section 3.3, Biological Resources of the Draft EIR and Response to Comment PC085-1.

Comment PC263-5

5. Impacted Views

- CenterCal never presented a 3-D model of their proposal to the citizens of Redondo Beach (despite their promise to do so). This seems to suggest duplicity.
- Where there is now an open parking lot adjacent to the harbor there will be a 45- foot tall concrete parking structure, 560 feet long, between the road and the ocean.
- There will be a 240 long movie theater adjacent to it.
- 4/10ths of a mile of development on a 5/10ths of a mile site is being proposed in the DEIR.
- It defies logic to suggest views will not be impacted.
-

Response to Comment PC263-5

The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) used to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the peered reviewed 3D computer model.

The conceptual plans for the project site (refer to Figure 2-8 on page 2-49 in Chapter 2, Project Description of the Draft EIR) place the specialty cinema in the northern portion of the project site adjacent to the proposed parking structure and on the eastern side of the new main street, which does not interfere with the pedestrian experience of the waterfront.

The commenter's opinion is noted. Please see Section 3.1 of the Draft EIR for analysis of aesthetic impacts. Please also refer to the Master Response #9: Views and Scale of Development.

Comment PC263-6

6. Violation of Zoning Cap

- Current zoning states "cumulative development for commercial recreation district sub areas 1-4 shall not exceed a net increase of 400,000 sq. ft. of floor area"
- According to the DEIR, there will be over 500,000 sq. ft. of development.
- This violates the zoning cap.
- This increases by 10 times the CURRENT level of development.

Response to Comment PC 263-6

The commenter correctly stated that new development in the Coastal Commercial zones may not exceed a net increase of 400,000 square feet in comparison to the amount of development in existence on April 22, 2008. The proposed project includes the demolition of numerous structures, which were in existence as of April 22, 2008. As described in Section 2.4.1.1 in Chapter 2, Project Description, the proposed project would only result in the construction of 290,113 square feet of net new development, which is consistent with 400,000 square foot cumulative FAR cap (see Table 2-5 on Page 2-54 in Chapter 2 of the Draft EIR and page 3.9-56 of Section 3.9, Land Use and Planning of the Draft EIR). This does not constitute a 10-fold increase in development as suggested by the commenter.

Comment PC263-7

7. Traffic

- If the current development will (according to the DEIR) increase by 10x, the traffic will also increase dramatically. The DEIR in no way explains how this small area will accommodate that much traffic.
- At the same time, the parking assessment is 200 spaces short, and does not include the parking needs of the sport-fishing pier, whale and fishing boats, stand up paddlers and kayakers.
- Obviously there will be increased air pollution.

Response to Comment PC263-7

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Furthermore, the project would not result in a 10-fold increase in traffic; the existing trip generation rate is 9,684 daily trips, whereas the proposed project would result in a daily trip generation rate of 22,234 daily trips. (See Draft EIR Table 3.13-13.) Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR, which includes the proposed traffic mitigation measures. As it relates to parking at the project site, please refer to Master Response #7: Waterfront Parking.

The Draft EIR discloses the air emissions associated with construction and operation of the project in Draft EIR Section 3.2.

Comment PC263-8

The bottom line is this: the CenterCal plan, per the DEIR, subordinates the use of the harbors parks and recreational features to restaurants and shopping. Pollution, ecological damage, and risk to public safety are logical consquences.

California has a most precious commodity – its ocean. The CenterCal plan, per the DEIR, makes access to and enjoyment of the ocean far more difficult, if not impossible, for California residents.

I oppose this project!

Response to Comment PC263-7

Please see Response to Comments PC263-1 through 6 for more detailed responses. The comment states an opinion relevant to the project but does not introduce new environmental information. However, your opinions on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC264 CONNIE ABELA

Comment PC264-1

I have lived and owned property at Seascape II for the last 13 years. It is extremely concerning to me that some of the significant concerns that I previously emailed to you for consideration for completion of the EIR was recognized as only minimal impact. I am quite concerned about the following impacts of the planned development for Redondo as being a significant impact on so many levels as follows:

1. Traffic will be have a significant impact on the level of noise along Pacific which is already very bad on weekends. Therefore, with the addition of all of the shops planned, traffic will make a significant impact on Pacific. As it is, there are many times that I can't get into and out of my driveway.

Response to Comment PC264-1

This comment is substantively similar to another comment submitted by the commenter. Please also see Response to Comments PC020-1 through 4. The analysis presented in Section 3.10, Noise of the Draft EIR determined that noise impacts associated with operation of the proposed project would be less than significant, with the exception of the increase in existing ambient noise levels associated with vehicle traffic along Torrance Circle/Boulevard between the project site and Catalina Avenue. Noise along the Pacific Avenue Reconnection was found to be less than significant. Please refer to Draft EIR Section 3.13, Traffic and Transportation and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for a summary of the traffic results.

Based on the traffic modelling analysis completed for the proposed project, it is anticipated, that with implementation of the project, a portion of traffic that currently uses Pacific Avenue for southbound traffic (which is in the vicinity of the Seascape II driveway onto Pacific Avenue) would shift to Harbor Drive, thereby reducing traffic volumes on the existing segment of Pacific Avenue.

Comment PC264-2

2 Traffic will also have a significant impact on security and safety and require more policing in the area.

Redondo will be expected to cover the extra expense for policing the road during and after the construction especially since the developer will not be required to provide any financial contribution that could mitigate this expense?

Response to Comment PC264-2

As detailed throughout Section 3.11, Public Services of the Draft EIR, in addition to a relocated Pier Sub-Station (the police sub-station currently located at the site), the proposed project would include on-site private security and security measures to increase site safety, including architectural design (e.g., placement of doors, windows, and staircases to minimize blind spots) nighttime security lighting, security cameras, and providing lighted landscaping that allow for clear sight lines by security personnel and security devices to monitor the site. With the proposed project, the security is anticipated to be better than under existing conditions.

Comment PC264-3

3 Lack of sufficient parking for the development will significantly impact the complex where I live since we have minimal visitors parking available. I fear that transients will use our visitors parking. This will affect additional expense for my condo association because we will need to hire extra security.

Response to Comment PC264-3

Parking for the proposed project complies with RBMC Section 10-5.1706, which requires off-street parking for the uses at the project site. As described in Master Response #7: Waterfront Parking, this would include shared parking and valet parking.

Comment PC264-4

4 Traffic will have a significant impact on making it more congested along Pacific and Harbor generated not just through the construction period but also after the new road is put in place. I fear how this will impact the ability of having reasonable access into my home along with my neighbors that live in the complex.

Response to Comment PC264-4

Please refer to Response to Comment PC264-1 above relative to impacts during the construction phase. The comment also implies there would be a significant traffic impact during construction. As demonstrated in Draft EIR Table 3.13-12, there is almost a five (5)-fold decrease in the number of trips during project construction in comparison to existing conditions. (1,895 construction passenger car equivalent [PCE] vehicle trips in comparison to the 9,684 existing vehicle trips from current operations.) Consequently, construction traffic impacts were determined to be less than significant. Furthermore, the City has proposed a Condition of Approval (COA) providing for construction related delivery trips during non-peak traffic hours (COA TRA-1 of the Draft EIR page 3.13-2).

As shown in Table 3.13-28 on page 3.13-86 of the Draft EIR, contrary to the assertion in the comment, the project is not expected to significantly impact any of the study intersections on Pacific Avenue and Harbor Drive, under Cumulative plus Project conditions, which includes both the effects of the additional vehicular traffic expected to be generated by the project, as well as the Pacific Avenue Reconnection. The study intersections on these roadways are projected to operate at an acceptable level of service B or better during both the AM and PM peak hour after the project is operational.

Comment PC264-5

5 There will definitely be a significant impact on our views of the waterfront. I am very concerned about the aesthetics of the area from the density of the buildings being planned destroying the view not only from my property but also along the waterfront area. The plan looks like there will be a loss of views from the new bike path on Harbor Drive because an ugly three story parking garage will block the view for the public. Redondo will look like the overbuilt nearby cities of Hermosa Beach and Manhattan Beach. Therefore, this will have a significant impact not only on lifestyle but also home values.

Response to Comment PC264-5

As noted in Draft EIR Section 3.1, Aesthetics and Visual Resources, page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5). Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44 through 45. The Draft EIR determined that some views would be modified by the project; however, these impacts were determined to be less than significant. The methodology for determining the view impact is described in the Draft EIR in Section 3.1.4, beginning on page 3.1-34. Changes to the visual character are described under Impact AES-2 in Section 3.1. Please also refer to the Master Response #9: Views and Scale of Development for information on the heights and views associated with the proposed project.

Comment PC264-6

6 There are already certain buildings and businesses that are vacant. I fear that there will be more of a ghost town with vacant buildings doing nothing but taking up space destroying views and possibly bringing in vagrancy. In the end the residents of the city will be ultimately financially responsible to hold them and determine what to do with them.

Response to Comment PC264-6

As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Please also see Draft EIR Chapter 5, Other CEQA Considerations, for discussion of urban decay on- and off-site.

Comment PC264-7

7 Additional police protection will be required to patrol the area for our safety but also for the complex that I live in will also need to pay for additional security to maintain safety from unwanted visitors to our complex. The complex that I live in continually experience break-ins now. This will significantly impact higher expense for additional police protection as well as additional security for the complex that I live in.

Response to Comment PC264-7

Please see Response to Comment PC264-2 above.

Comment PC264-8

8 The air quality which will ultimately impact my health from additional vehicles, trucks, construction from this project will create a significant impact.

Response to Comment PC264-8

The Draft EIR discusses the impacts to air pollution in detail in Section 3.2, Air Quality. Also refer to Response to Comment PC253-1.

Comment PC264-9

9 The development will prevent or imped access to Coastal Dependent waterfront recreational and commercial uses because elimination of parking facility or severely limited usable parking will make traffic gridlock that prevents access, making people walk through a high density retail/commercial with equipment or boats to get to the waterfront, having to park across an active street to get to Seaside Lagoon or boat slips in Redondo Marina.

Response to Comment PC264-9

Please refer to Master Response #7: Waterfront Parking.

Comment PC264-10

10 The impact to public safety, exposure to hazardous pollution, excessive fresh water consumption, hazards to people; in particular exposure to children from pollution and garbage in opened Seaside Lagoon with untreated water.

Response to Comment PC264-10

Public safety is addressed on Section 3.11, Public Services, and Section 3.13, Traffic and Transportation related to boat ramp and Seaside Lagoon. Potable water consumption is detailed in Section 3.14, Utilities of the Draft EIR, and the project-specific water supply assessment (Appendix M1 of the Draft EIR) found that the implementation of the proposed project would not exceed the capacity of local infrastructure or water supplies, entitlements and resources, which would result in the need to construct new infrastructure or expand or secure new entitlements that could cause significant environmental impacts not already addressed as part of the proposed project. Water quality is detailed in Section 3.8, Hydrology and Water Quality of the Draft EIR. In addition, please refer to the Master Response #4: Modifications to the Seaside Lagoon.

Comment PC264-11

11 Last but not least of all, I am concerned that the developer would not be required to pay any rent for 30 years or until they make a profit of more than 10%. This will be a significant financial burden for Redondo to pay for the additional resources of police and fire protection, water, utilities, etc. If we do not have a source of substantial income for 99 years and the project is not successful to support the business being developed, Redondo will have vacant buildings, as we do now and Redondo will bear a significant financially burden to look after them if we need to tear them down. Why would the Mayor and City Council approve such a plan?

Where and how was 10% devised? How will the 10% be determined – based on Gross Revenue or Net Assets? How can we be sure that the developer will be fiscally responsible to earn a 10% plus profit? Will the developer employ City employees on their board to review that they are being fiscally responsible?

Response to Comment PC264-11

The commenter states an opinion that is outside the purview of an EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC264-12

These are some but not all of my concerns about the development of this mall. I appreciate that you will review and include them in your evaluation of the Environment Impact Report in an objective manner.

Response to Comment PC264-12

Please see Response to Comments PC264-1 through 11 and PC020-1 through 4. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC265 JOANNE NEWMAN

Comment PC265-1

I am so puzzled.....why wasn't an analysis done on the weekend traffic? Was that left out deliberately or was it an oversight? If an oversight, it can still be done. If not.....I do not understand why. To me doing a weekend analysis should have been of major importance and the lack of one certainly negates any conclusions noted in the DEIR traffic study as the analysis is seriously flawed by the lack of inclusion of the heavier traffic on weekends.

Response to Comment PC265-1

The City's traffic study guidelines define significant traffic impacts based on changes in weekday morning and afternoon peak hour conditions caused by a project. Regarding weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. The commenter provides no scientific basis for assertions that the traffic study is flawed and a new study is required. The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC266 DAWN ESSER

Comment PC266-1

As a 27 year resident and property owner in Redondo, I strongly object to the EIR on the CenterCal project stating this project will not have any significant environmental impact. This project will greatly impact the quality of life for the residents due to the large increase in traffic, the negative impacts to our harbor, the only harbor in the South Bay, and the face of our waterfront due to the following facts stated in the EIR:

1. Increased Traffic to already stressed roads - Anita, Harbor Blvd, PCH - 12,550 additional car trips per day;

2. 3-Story Structures blocking 80% of views along Harbor Blvd;

3. Recreational: 67 trailer spots down to 20, less access for boaters, kayakers, swimmers, SUP'ers , and reducing the size of Seaside Lagoon to 1/3rd its current size;

4. Water Quality: ~25% of 2014 measurements exceed E-coli and fecal standards.

It should be the City's responsibility to ensure the quality of life of its residents, not developers. These environmental impacts are significant and need to be addressed and not dismissed.

Response to Comment PC266-1

Impacts associated with the construction and operation of the proposed project are summarized in Section ES.7, Summary of Environmental Impacts of the Proposed Project and Alternatives (beginning on page ES-30) in the Executive Summary associated with the Draft EIR. Although a majority of the impacts were found to be less than significant or less than significant with implementation of mitigation, the Draft EIR analysis did determine that there would be a total of six significant and unavoidable impacts of which four would occur during construction (short-term throughout the 2.25 to 2.5 years of construction), two would occur specific to the operation of the project, including one impact (i.e., tsunami hazard) that would continue at the project site (although with implementation of mitigation measure the impacts would be reduced) due to natural uncertainties of such an event occurring in the future. Table ES-5 and Table ES-6 in the Executive Summary (beginning on page ES-35) identifies significant and unavoidable impacts associated with the proposed project.

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, as well as Section 3.13, Traffic and Transportation of the Draft EIR. The baseline conditions for each individual intersection were disclosed in Draft EIR Table 3.13-4. The Draft EIR analyzed impacts on PCH (Intersections 7, 10, 19, 24, 26, 31, 34, 36, 37, 38, 39, 40, 41), Harbor Dr. (Intersections 4, 9, 11, 15, 20, 35), and Anita (Intersections 7 and 8). However, not every intersection would see an increase of 12,550 cars a day; please see the discussion of trip distribution on Draft EIR page 3.13-42 ("Trip Distribution") and Appendix L1 pages 11 and 43. The EIR disclosed significant impacts at Intersections 6, 7, 10, 19, 26, 36. However, with implementation of mitigation measures, these impacts would be reduced to less than significant.

Section 3.1, Aesthetics and Visual Resources of the Draft EIR for analysis of aesthetic impacts. Please also refer to the Master Response #9: Views and Scale of Development.

Refer to Section 3.12, Recreation of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. Please also refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding the proposed small craft boat launch facility. Section 3.8, Hydrology and Water Quality of the Draft EIR detail how the project would not exacerbate existing water quality in King Harbor, and would result in water quality improvements.

COMMENT LETTER NO. PC267 MICHAEL & JUDITH BORRETT

Comment PC267-1

My husband and I, 40+ yr. Redondo residents, want to go on record as opposing the massive redevelopment plans for our harbor area. We agree that the pier area is a mess but suggest that the existing area be torn down and rebuilt using with similar footprints and space. No more hotels; no upscale mall type businesses; no theater; lots of open, green, view space and no grand tourist destination mindset. The traffic and other environmental impacts are being ignored by the city politicians. We look forward to

becoming proactive in the organizations that continue to be outraged by over the top development proposals. Enough is enough.

Response to Comment PC267-1

The comment is noted. The Draft EIR included analysis of eight alternatives in Draft EIR Chapter 4, including an analysis of a "Reduced-Density" alternative (Alternative 7). The Draft EIR analyzed environmental impacts in Sections 3.1 through 3.14, including traffic (Section 3.13). Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC268 KATHY BULLOCK

Comment PC268-1

Hi Katie, this is my vote for today's deadline. Redondo Beach pier will not be the same without POLLY'S.

Response to Comment PC268-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC269 RENA TISHMAN

Comment PC269-1

I am a resident of South Redondo Beach. I live a little off of Torrance Blvd. I do not want the traffic, noise, pollution, commotion that will be brought on by a new shopping mall and no pier. I cannot even get my car out safely onto Torrance Blvd as it is!! The Harbor has history and character. Many families, local and from the inner city, enjoy coming out to stroll on the Pier, visit the funky shops and restaurants, fish off the pier, take photos of the Pier, swim right nearby, and just enjoy the special place we have. Pumping in bright, shiny, and boring designer shops will strip our Harbor of its wonderful character, and leave only memories of the wonderful Pier we once had. This would be very sad and a big mistake.

Response to Comment PC269-1

The Draft EIR analyzed environmental impacts in Sections 3.1 through 3.14, including traffic (Section 3.13), noise (Section 3.10), air quality (Section 3.2), and water quality (Section 3.8). The commenter states an opinion/preference relevant to the project and the projects approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC270 JOAN IRVINE

Comment PC270-1

I support the concept of the Waterfront Village.

I hope that they could make a few changes such as:

- Maintain the little pier where Polly's on the Pier is; keeping a little piece of our history
- Find an alternative for the parking structure at Harbor and Beryl that is planned for in front

of the Crowne Plaza and The Redondo hotels.

Response to Comment PC270-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. In addition, refer to Master Response #7: Waterfront Parking for information on the new parking at the site. The EIR analyzed a reasonable range of alternatives in Draft EIR Section 4, Analysis of Alternatives. However, the commenter's opinion is noted, and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC271 ROGER LIGHT

Comment PC271-1

I have been a resident of Redondo Beach for the last 15 years and a resident of the South Bay for most of my life. I have a continuing interest in looking out for our truly unique waterfront town. I want to go on the record as strongly skeptical of much of what I have read and heard about the draft Environmental Impact Report. The misinformation that has been used as a smoke screen by many to tout this project as a "win-win" is anything but. On every level our city will lose.

To claim that the draft EIR covers all possible aspects of environmental impact of this poorly planned project is ludicrous. When you are looking at a massive project such as this that will take many years to construct, including impacting 36 of 150 acres of the waterfront of Redondo Beach you must be sure that this is the best possible alternative. This type of mall with 380,000 square feet of development brings forth so many unknowns that the draft EIR cannot possibly address. To have such a massive development of retail space that will not open for well over the three years of claimed construction time is irresponsible from an environmental standpoint, or any other. The way people shop is in tremendous flux and this mall at the sea will be outdated before it opens. More and more of us are not purchasing from brick and mortar locations but rather from the ease of our home on the internet. That trend will only continue and to create a white elephant project such as this defies logic.

Large retail environments must be strategically place with an infrastructure that can support the anticipated influx of customers. To open such an "attraction" when a large portion of potential access is the ocean makes no sense what so ever. That the primary access road is now a single lane in each direction and already, at times. a nightmare to travel reduces the logic of this project to below zero.

Response to Comment PC271-1

The Draft EIR was prepared by the City and a team of technical experts in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (State CEQA Guidelines) (14 California Code of Regulations [CCR] Section 15000 et seq.). As also discussed under CEQA case law "A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true…" (*Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018.)

As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The proposed project is categorized as a mixed-use development, including office and hotel with a retail, dining, entertainment (RDE) component that has enhanced public open spaces and recreational opportunities unique to the waterfront. In fact, as analyzed, the project includes more restaurants, including a public market hall, than retail. Additionally, one of the project objectives is to reduce seasonality. As discussed in the City Council's April 8, 2008

Administrative Report for the zoning amendments, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors." The Draft EIR also analyzed the potential for urban decay on- and off-site in Draft EIR Chapter 5.

The comment also asserts that the primary access point would be a single lane road and would be a nightmare to travel. Please see Draft EIR Section 3.13, Traffic and Transportation, and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC271-2

Traffic impact and disruption in the construction and operation of this project has been woefully underestimated the the EIR. Noise pollution impact has not been studied in any systematic manner and the inevitable impact on the water quality of the ocean has been all but ignored. There is no way to predict or control what these large retailers will send into our ocean and on to our beaches.

Response to Comment PC271-2

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR. Section 3.10, Noise and Section 3.8, Hydrology and Water Quality, of the Draft EIR include the detailed analyses related to noise and water quality, respectively.

Under existing conditions, the project site is composed of approximately 79 percent impervious surfaces and results in stormwater (including any pollutants associated therewith) draining into King Harbor. (Draft EIR, pages 3.8-7 through 8.) With implementation of the proposed project, there would be a reduction in impervious surfaces in comparison to baseline, and infiltration/retention facilities would be incorporated to capture the first 0.75 inches of rain (during a 24-hour period). (Draft EIR pages 3.8-58 through 59.) Furthermore, Seaside Lagoon currently requires chemical treatment to remove chlorine prior to draining the water into the King Harbor; with implementation of the proposed project, this chemical treatment would no longer be required. (Draft EIR page 3.8-61.) Water circulation modeling also indicates that the modifications to Seaside Lagoon would not change the water exchange time in the harbor, and that Seaside Lagoon would have shortest exchange time out of the three marina basins. (Draft EIR page 3.8-63.) Please also see Response to Comment PC205-1 for discussion of solid waste collection.

Comment PC271-3

The financial responsibility aspects of this project, while not directly relating to the draft EIR, are also troubling. The fact that this company Redondo Beach proposes to partner specializes in taking over other distressed projects is ironic since if the project is build, in 10 years some such company will likely be taking over this disaster from them. That fact that the city of Redondo is on the hook for ensuring that this company makes money or else they don't pay much of anything is just bad business and a wonderful incentive for failure.

Response to Comment PC271-3

The commenter states an opinion that is outside the purview of an EIR. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC271-4

This project does not fit with the waterfront or greater Redondo Beach community and must be rejected and an alternative master plan developed. This project completely ignores the fact that something similar to this will eventually will be built across the street at the AES power plant site and without a comprehensive analysis of all future development in the area the chances of something viable and constructive coming out of this project are astronomically small.

Response to Comment PC271-4

Chapter 4, Analysis of Alternatives of the Draft EIR analyzed seven (7) alternatives associated with the project site and an alternative related to alternative boat ramp locations with development at the project site. Regarding the future of the AES project and cumulative impacts, refer to Master Response #1: AES Power Plant Site and Master Response #2: Cumulative Analysis. The comments are acknowledged and these comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC272 JAMES HANNON

Comment PC272-1

I would like to submit my attached Draft EIR Comments to be recorded in the Draft EIR and other related documents.

Other option for building a South Pier Parking structure ($30-50 million dollar project?) Summary, I believe relocating about 90+% of the vehicle parking from the 100 West Torrance Blvd location would be money better spent; and still leave ample parking space for service, emergency, special needs and loading/unloading vehicles and temporary parking by hotels (this makes up the 10%). Then, this land could be reused for developed, parks, art, other, etc. and eliminate parked vehicles having an ocean view.

The Southern parking structure would be relocated to the Civic Center property, on Diamond and PCH (built in the mid-1950s), it has exceeded its life expectancy, and needs to be replaced.

We also know the city and police services cannot be suspended during the reconstruction and the Civic Center and Police Station will need to be relocated.

Background information leading up to my conclusion to relocate the Civic Center and Police Station:

1. Rebuilding the Pier's South Parking structure would be far less expensive (because of the water table & more) if it were built where the Civic Center is located now. We know it can be built by going down 3 or 4 stories, such like the Main Library did. But, in this case the top surface could be used for open space or parkland (much like Pershing Square in L.A.). I also suggest we use clean electric trams to travel between the new parking structure and to distribute visitors to their Waterfront destination. This would mitigate the number of cars near the ocean, the end result being less traffic near the ocean, and less pollution and noise. The tram path would travel on Diamond. cross Catalina and down through the center of Plaza Park to the new Pacific Ave road; and there should be a walking path next to the tram path. N. PCH will be the primary route for visitors to take and it was built to handle large volumes of traffic unlike Catalina and/or Beryl St., and this would greatly improve traffic flows to/from the Waterfront area.

2. The Civic Center and Police Station should be relocated to a new multiple-level building (it won't block any views) on PCH and Vincent St, and use some of RUHS property? (it is the biggest school campus

west of the Mississippi & gifted from the City) or, move the Police Station to a central or northern Redondo location and leave the Civic Center in South Redondo?

Response to Comment PC272-1

The commenter suggests relocating 90+percent of the project's parking facilities to the Civic Center at the Intersection of Pacific Coast Highway and Diamond St. The project analyzed a reasonable range of alternatives in Draft EIR Chapter 4 (eight alternatives). As discussed in CEQA case law, alternatives are to be provided "only to the project as a whole not to the various facets thereof." (CEQA Guidelines Section 15126.6(a) ["an EIR need not consider every conceivable alternative to a project."]; *Village Laguna of Laguna Beach Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.)

Furthermore, such a suggestion is considered infeasible for numerous reasons and would not reduce or avoid a significant impact. The Civic Center currently contains City Hall, the public library, and the police station. The commenter acknowledges that these facilities provide vital services. Furthermore, many of these facilities are not at the end of their useful life, for example the new Library opened on July 8, 1995. The demolition and reconstruction of these other facilities would also result in additional environmental impacts and simply relocate activities and impacts to other locations in the City (and not reduce or avoid significant impacts from the project). The intersection of PCH and Diamond Street is located approximately 0.53 mile from the northern portion of the site, and approximately 0.67 mile from the southern portion of the site. Even with a shuttle service, as suggested in the comment, the inconvenience created by such a system would significantly reduce the viability of the proposed project and inconsistent with the project objectives, including but not limited to optimizing the full potential of the project site, and providing sufficient revenue. Such a proposal would significantly lengthen the duration of time needed to access the project site, and would significantly reduce the number of short duration visitors (e.g. an individual is unlikely going to the project for a short 10-30 minute time frame if the time to access the site adds an additional 10-30 minutes onto the visit). This rationale for rejecting offsite parking was expressly upheld by the Coastal Commission and the LA Superior Court in relation to the Del Mar Fair Grounds in *Sierra Club v. California Coastal Commission* (2015) Case No. BS151130 [Sept. 1, 2015 Decision: "If patrons will not use off-site parking – or if the hassle form using shuttle parking results in decreased attendance –that is a legitimate factor for infeasibility. Substantial evidence supports the Commission's findings that the alternatives to the Project were not feasible."]

As detailed in Section 3.13, Traffic and Transportation of the Draft EIR, the RBMC Title 10, Chapter 5, Article 5. Parking Regulations (Section 10-5.1700 et seq) provides the City's parking regulations. Section 10-5.1706 delineates the minimum required off-street parking standards for commercial, industrial, and other nonresidential uses. Parking for the proposed project must be provided on site and can include shared (or overlap) parking strategies. These parking regulations were the subject of over a decade of planning efforts as discussed in Draft EIR Chapter 2, Project Description, Section 2.1.1.5.8, which were approved by Planning Commission, City Council, Coastal Commission, and the Redondo Beach electorate. (See also *Citizens v. Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553,571-573 [The Court held that the analysis of alternative locations in a project level EIR "would have been in contravention to the legislative goal of long-term, comprehensive planning…case-by-case reconsideration of regional land-use policies, in the context of a project specific EIR, is the very antithesis of that goal.") The commenter's thoughts regarding parking off-site and relocation of Police Station is noted. Your comments are acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC273 MARY MEDINA

Comment PC273-1

I am all for harbor revitalization - but I would prefer to see more boating, and more open space, in our Harbor and less buildings and definitely no mall!

Response to Comment PC273-1

The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC274 KATHY BULLOCK

Comment PC274-1

Please do not take that part of the pier away. We have been dining outside at Polly's and walking by there for years. It is part of the Roots of Redondo Beach. It would not be the same without POLLY'S or that section of the pier. Thank You!!

Response to Comment PC274-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC275 JIM SAUL

Comment PC275-1

I would like to see Polly's to remain on the pier.

Response to Comment PC275-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC276 CHERYL TCHIR

Comment PC276-1

As a 47-year resident and homeowner in Redondo Beach, I am very concerned about the potential negative impacts of CenterCal's proposed waterfront development. I direct my comments to several of the 14 resource areas that were analyzed in the DEIR.

Aesthetics and Visual Resources

According to the report, the development "would not have a substantial adverse effect on a designated local valued view available to the general public." I disagree. A 4-story parking garage would substantially affect the public view of the water as well as impacting the view from the recently renovated Redondo Hotel. The current 3-level pier parking structure would be replaced with a 5-level structure –

with the attendant loss of views. Furthermore, CenterCal has never submitted a 3- dimensional design so the public CAN see exactly where the skyline/view will be changed. The drawings of the proposed development have warnings: "for conceptual purposes only" or "For discussion purposes only. Actual development and placement may vary." (Fig. ES-3) How are we to know what the aesthetics and visual impairments will be, and how could this impact report state that there would not be a substantial adverse effect when we have yet to see the proposed skyline?

Response to Comment PC276-1

The commenter's opinion is noted. Please see Section 3.1 of the Draft EIR for analysis of aesthetic impacts. Please also refer to the Master Response #9: Views and Scale of Development. As noted in Draft EIR Section 3.1, Aesthetics and Visual Resources, page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1 including views from Harbor Drive (Key Observation Views 4 and 5). Figures 3.1-8 and 3.1-9 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes on Draft EIR page 3.1-44 through 45. The Draft EIR determined that some views would be modified by the project; however, these impacts were determined to be less than significant. The methodology for determining the view impact is described in the Draft EIR in Section 3.1.4, beginning on page 3.1-34. Changes to the visual character are described under Impact AES-2 in Section 3.1. As noted therein, under the threshold AES-1 the EIR analyzed "designated local valued view available to the general public", and which includes a graphic showing maximum building heights throughout the project site. However, private views (such as those to individual privately owned developments are not considered a local valued view.

The commenter also raises concern about figures in the Draft EIR, which identify the site designs as "conceptual." The final configuration of the project is not final until approved by the City's decision-making body. The Draft EIR disclosed the maximum potential heights of the proposed structures in Figure 2-8 in Chapter 2, Project Description, which ensures a worst-case analysis in this context. (See *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.]; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572 [In the Bowman case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant "…even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense"].) The project final designs will be subject to the City's design review process under RBMC 10-5.2502, and would be reviewed to determine whether any such modifications trigger recirculation or supplementation. (CEQA Guidelines Section 15162.)

The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) used to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the peered reviewed 3D computer model.

Comment PC276-2

Noise

NOI-3: The project would cause substantial permanent increase in ambient noise in the project vicinity above levels existing without the project and in excess of the City's standards. Significant and unavoidable – no mitigation is available.

I suggest eliminating Pacific Avenue, as that appears to be the addition that increases levels in excess of city standards. The EIR notes on NOI-3 alternative 5 that there would be no significant increase in ambient noise if Pacific Avenue were not created. Bringing the noise, air pollution, and general chaos of more autos closer to the water's edge is a bad idea for pedestrians, cyclists, and residents of nearby homes. It detracts from the beauty of the natural environment. Alternative 5 is the solution here.

Response to Comment PC276-2

The commenters statement that the project-related increase in ambient noise levels would exceed the City's standards (threshold NOI-1) is not accurate. As discussed in Section 3.10, Noise, of the Draft EIR, the 4.4 to 4.5 dB CNEL increase projected to occur along Torrance Circle/Boulevard between Catalina Avenue and the project site would exceed the threshold of significance for evaluating incremental noise impacts from surface transportation modes (threshold NOI-3); however, the resultant noise level of 64.4/64.5 dB CNEL along that roadway segment would still be within the range of what is considered to be normally acceptable for residential uses (i.e., less than 65 dB CNEL). Additionally, as discussed on Draft EIR page 3.10-18, the City's noise regulations are not applicable to motor vehicles. As such, the subject noise impact would not exceed City noise standards (threshold NOI-1).

The commenter's preference for Alternative 5 is so noted and will be considered by decision makers before action is taken on the project.

Comment PC276-3

Traffic

TRA-2: would not conflict with an applicable congestion management program. The traffic modifications outlined in TRA-1 seem unlikely to prevent traffic gridlock in the waterfront vicinity. As the waterfront is today, traffic crawls at peak times on PCH, Herondo, and Catalina. Adding turn lanes and additional through lanes will not accommodate up to 12,550 additional car trips per day. This simply is not a good place for the size development proposed. Alternative 1 – no development as proposed is the best solution, or alternative 7 – reduce the density by 50% is next best.

Response to Comment PC276-3

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR. Specifically, Table 3.13-23 (on page 3.13-70) presents the intersection performance results for the Mitigated Existing plus Project scenario using the ICU methodology, which is also applicable for the CMP analysis. Table 3.13-24 (page 3.13-76) presents the intersection performance results for Intersection 36 under the Mitigated Existing plus Project scenario using the Highway Capacity Manual (HCM) methodology. Both tables support the conclusion of the traffic analysis that impacts after mitigation would be less than significant. The commenter does not introduce new environmental

information nor does the commenter provide any support to their assertion that the analysis, including mitigation, would affect what they refer to as 'gridlock' in the waterfront vicinity.

Comment PC276-4

TRA-3: The proposed project could substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Placing the boat launch at mole A, opening Seaside Lagoon (at 2/3 its former size) to the ocean, and placing paddle boats, standup surfboards, kayaks, and canoes within the reduced lagoon size is a recipe for traffic accidents. This is supposed to be an enhanced waterfront, yet these waterfront activities are being squeezed into a smaller and more hazardous location. The boat ramp should be placed elsewhere, and the lagoon should be larger to accommodate the ocean-going sports. One mitigation suggested sounds like a classic "passing of the buck": "Additionally, leases with tenants within the project site associated with the rental of paddle boards, kayaks, and peddle boats will be required to maintain records that the renters of this equipment have been instructed on safety and waterside signage." This appears to place the responsibility for safety with the public rather than with the safe design of the project, where it should be. Redesign this area.

Response to Comment PC276-4

The commenter's opinion is noted. As detailed in Section 3.13, Traffic and Transportation of the Draft EIR (beginning on page 3.13-82), in addition to mitigation measure MM TRA-8 that the commenter mentions, the magnitude of potential conflicts would, however, be offset because of the slow speeds that the motor boats would operate at during departure from or return to the ramp area. This would allow time for sufficient maneuvering as necessary to avoid errant personal recreational watercraft if encountered. In addition, the comment ignores the various other components of the mitigation measures, including but not limited to the requirement that "buoys with signage shall be placed to delineate, and segregate, waterside boat lanes and paddle craft lanes." The waters of the United States (which includes King Harbor and the water portion of the project site) and its territories are marked to assist navigation by the U.S. Aids to Navigation System. The goal of the U.S. Aids to Navigation System is to promote safe navigation on the waterway. This system employs a standardized and simple arrangement of colors, shapes, numbers and light characteristics to mark navigable channels, waterways and obstructions adjacent to these. Like information for drivers on the roadways, Aids to Navigation provide a boater signage and demarcation aids to help in determining location, getting from one place to another or staying out of danger. Although the primary components of the U.S. Aids to Navigation System are beacons and buoys, the aids may be anything from lighted structures, beacons, day markers, range lights, fog signals and landmarks to floating buoys. Each has a purpose and helps in safe navigation. Mitigation measure MM TRA-8 in the Draft EIR also requires paddle boards, kayaks, and peddle boat renters to be provided with instruction on safety and waterside signage.

All mitigation measures would be subject to a Mitigation Monitoring and Reporting Program consistent with CEQA Guidelines Section 15097.

Comment PC276-5

Recreation

Although not evaluated in the way this EIR was designed, another area of recreation that is reduced rather than enhanced is the reduction of trailer spots for boaters, kayakers, and SUPers from the current 67 down to 20. If the selected boat launch site does not allow for more spots, a new ramp site should be chosen. Again, this waterfront development should be increasing access to waterfront activities, not reducing them.

Response to Comment PC276-5

Please refer to Master Response #7: Waterfront Parking and Master Response #8: Boat Ramp in King Harbor.

Comment PC276-6

Water Quality

HWQ-1: The proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade water. Although the project itself will not substantially degrade the water, it is important to note that the water quality at the Redondo Beach pier regularly receives a grade of F from Heal the Bay due to measurements that exceed E-coli and fecal standards. Opening the Seaside Lagoon to this water to become a tidally-influenced lagoon seems a sure way to make the "Mother's Beach" unsafe for humans. The lagoon needs to be redesigned to remain closed or to find a new way to keep the area safe.

Response to Comment PC276-6

Please refer to Section 3.8, Hydrology and Water Quality of the Draft EIR for details on water quality. In addition, please refer to the Master Response #4: Modifications to the Seaside Lagoon.

COMMENT LETTER NO. PC277 ROGER CARLSON

Comment PC277-1

… thanks for your time and good luck with the project. My comments on the DEIR are below.

I've lived in the South Bay since 1992. I've lived in Redondo since 1998, and bought a house in Redondo in 2004.

I worked at TRW for 17 years.

I'm in the harbor area almost every day, it's my primary destination.

I've often had a boat in the harbor, right now I only have a kayak and my wife has a SUP.

I'm a member of the King Harbor Yacht Club. I've been in all 3 harbor yacht clubs, and all four of the marinas.

I've eaten at most of the restaurants in the harbor, they are our first choice for a night out.

I work out at Veteran's park 3 Monday, Wednesday, and Friday.

When I want a beer, I go to Naja's; I've been going there for 25 years.

I scuba dive at Vet's park wednesday nights and weekend mornings.

I've been fishing on Redondo Sportfishing boats.

I've used the boat hoist.

I've used the hand launch many, many times.

I've rented SUPs at several shops in the harbor.

I've been to many events in the harbor, and many events at Seaside Lagoon. I'm probably in seaside lagoon for an event a couple times a year, and in fact, we rented seaside lagoon and were married there in 2000.

We're always in the harbor for fireworks and the boat parade.

I've often gone to the sea fair, I always enjoy visiting the sea lab.

The harbor adds a great deal to my life; it makes my housing price and taxes and my time in traffic worth it.

There is a lot I like about the harbor now. It could certainly use increased maintenance, and some new businesses, and some fresh construction. There are elements of the CenterCal plan that I like.

Response to Comment PC277-1

The comment does not address an environmental issue. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC277-2

I hope that the CenterCal plan will do something to attract and retain my interest, I hope it has something for residents and not just visitors driving in or staying in boutique hotels.

- The significantly, suddenly, increased density of the CenterCal plan seems like more than we need.
- The scale of the plan would seem to require high customer headcounts and high maintenance costs. It does not seem achievable or sustainable. We could end up with a very large, very empty, very expensive, white elephant.
- Some sections of the plan do not seem well thought out.

Response to Comment PC277-2

As described in Section 2.2 in Chapter 2, Project Description of the Draft EIR, the objectives of the project include enhancing the waterfront experience for both residents and visitors. Specific elements of the proposed project are described in Chapter 2, Section 2.4. Regarding the economic viability of the project, see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The comment also suggests that the proposed project constitutes a "suddenly increased density." As discussed on Draft EIR pages 2-12 and 2-42, the proposed project is less than the cumulative development cap, which was approved by the City Council, the Redondo Beach electorate (Measure G), and the California Coastal Commission in 2010. Regarding the plan, the commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC277-3

So, my questions:

What will parking rates be in the new parking structures? What are current rates?

Will the new parking structure be able to bring in enough revenue to pay for its own maintenance, long term? The current parking structure was not able to bring in enough money to pay for its own maintenance. How will the new structure be different? Is it assumed that there will be more cars? Year round? Will each car pay more for parking? I assume that some fraction of the parking rate currently goes to maintenance of the parking lot. I think we can agree, based on the condition of the lot, that that fraction has not been enough. **What fraction of the future parking rate will have to go to maintenance of the future lot?**

Let's leave aside per-car fractions. We haven't done a good job of doing yearly maintenance on the parking garage, we're in a hole. If we don't get the number of cars per day that the DEIR assumes we'll get, we could be in a deeper hole. I'm curious how bad it could be.

- **How much have we spent on parking garage maintenance each year for the last 10 years?** There have been some good years and bad years in there, so it's important to look over a few years.
- **How much should we have spent, on average?**
- **What is yearly maintenance on the new garage expected to cost?**
- **How can we be assured that we will meet this level of maintenance funding when we have not done so in the past?**
- **How can we be assured that we are not going to have a bigger maintenance shortfall, and a bigger problem, 10 years from now?** Increased revenue is not guaranteed, especially in a seasonal attraction like a pier, and public/private partnerships have let us down before: the relatively simple boat hoist was not maintained by our private partner.

The parking lot once offered a discount rate to residents launching boats or using the hand launch. Now only bars and restaurants offer parking validations. **Will there be any discounted rates for residents using the harbor or the mall, especially for healthy activity like SUP?** It would be nice to offer a better rate or some incentive to local residents to take advantage of the area, more than just a bar's parking validation.

Response to Comment PC277-3

The focus of CEQA, and hence the Draft EIR, are physical environmental impacts and not economics (e.g., parking fees, revenue, and previous funding for infrastructure maintenance). The parking structure maintenance under the proposed project would be part of the public/private partnership. The details requested by the commenter on parking fees have not been determined, as the proposed project has not been approved or final design completed.

Comment PC277-4

I understand that the launch ramp is outside the CenterCal plan, but they are linked. **Will the launch ramp include area for rinsing trailers with fresh water?**

If there is no fresh water rinse, and we have only a small token launch ramp, I'd prefer to stick with the hoist. **Can we go back to the Coastal Commission and ask them to reconsider allowing us to have a hoist, which has a smaller footprint than a ramp?**

Response to Comment PC277-4

The small craft boat launch ramp is included as an element of the proposed project analyzed in the EIR. It would be implemented and maintained by the City. The launch ramp facility would include a wash down space or stall with a stormwater interceptor or other water treatment system that would treat runoff water before discharging it into the storm drain or sewer system. Retaining the hoist in lieu of boat launch ramp would require amending the City's Local Coastal Program (LCP), which is not within the scope of the proposed project.

Comment PC277-5

Please describe in detail how a solo person will launch a SUP at the hand launch. How long will the person's board be out of sight? Will the board be left alone in an area with high foot traffic? The current hand launch works pretty well: you drive down the access road past Polly's, drop off your board, drive back to the lot in front of the bar, and walk back to the hand launch. You are not out of view of your board for very long, and there isn't much foot traffic in the area. If someone swipes your board, they are likely to use the same path you're travelling on, or you're likely to see them with your board moving along the fence toward Joes. How will a new hand launch work? Will it be a high traffic area, like the new open beach where seaside lagoon was? That seems like a risk of increased theft.

Will the launch be at a hand launch near a boat ramp, near trucks that can easily steal your board? Will it be a long drive to park in a distant parking garage? Will it be shared parking at a hand launch near a launch ramp with a small parking lot? I have seen some launch ramp plans with parking space for 20-40 boats, sized to handle a number of boaters averaged over a whole year, without including hand launch SUPs and kayaks, much less handle summer weekend peak traffic.

Response to Comment PC277-5

The hand launch currently adjacent to the Seaside Lagoon would be relocated to within the lagoon as part of the proposed project. Under the proposed project, the area of Seaside Lagoon will be open year round. A person wishing to launch a SUP or kayak would walk to the launch or directly launch from the beach. Please refer to the Master Response #4: Modifications to the Seaside Lagoon for additional information. Hand launching could also occur at the boat ramp (along the boarding floats). Single vehicle stalls are proposed for parking at the small craft boat launch ramp facility that could be used by SUP and kayakers. As for a safe place for someone to keep their board, similar to existing conditions, it would be up to each individual to safely store their equipment. The current proposal includes some SUP storage. The proposed boat ramp facility includes a paved parking area for 20 vehicle/trailers (pull-through) and 20 single vehicles (total of 40 parking stalls) and is designed to be able to accommodate a larger number of boat launches than the existing boat hoists. Please also see Draft EIR Section 3.11 for discussion of police services.

Comment PC277-6

How many SUP and Kayak launches per day are expected? How many on a single, peak, summertime day? not just a yearly average, please.

How large will the hand launch parking lot be?

How many boat launches per day will there be at the ramp? I have heard 20-40, based on a yearly average. **How many on a peak day?**

How big will the boat ramp parking lot be?

Would it be possible to include SUP or kayak storage lockers for residents in the new layout? Similar to the manner in which Lanakila outriggers are kept by the water. This would allow a resident to rent a locker, keep a SUP in the harbor, and use the harbor without transporting the board.

Some images show SUPs being launched from the seaside lagoon beach. **Will SUPs be allowed near swimmers at this beach? Will swimmers now be allowed in the harbor? What about prone paddleboards? Will scuba diving be allowed from this beach?**

Will the new seaside lagoon layout be sized to handle large events like the superbowl 10k?

Will the new seaside lagoon be gated to handle private events, ticketed events or events with alcohol? We have great events now like the lobster festival, will we have the room for that anymore?

Response to Comment PC277-6

A short-term loading and unloading area will be available on the new main street adjacent to Seaside Lagoon where paddleboards can be unloaded. Long-term parking is available in the parking structure in the northern portion of the project or other parking in the area (i.e., Plaza Parking Structure, surface/street parking, and parking structure in the southern portion of the project site). It is expected that the proposed project will include SUP storage. For additional discussion of parking, please refer to Master Response #7: Waterfront Parking.

As noted under Response to Comment PC277-5, the proposed boat ramp facility includes a paved parking area for 20 vehicle/trailers (pull-through) and 20 single vehicles (total of 40 parking stalls).

Regarding uses at Seaside Lagoon (including boat launch information), see Section 2.4 in Chapter 2 Project Description of the Draft EIR and Master Response #4: Modifications to Seaside Lagoon. Please also see Master Response #7: Waterfront Parking. Please also see Draft EIR Section 3.13, Impact TRA-3 for discussion of interactions associated with small boat traffic. Special events at Seaside Lagoon would be subject to the City's Amusement and Entertainment Permit regulations or the City's Temporary Use Permit procedures, under RBMC Sections 4-17.01 and 10-5.2520).

Comment PC277-7

The DEIR discusses traffic mitigation at several intersections. **Will the arteries themselves be widened to handle additional traffic and turning lanes?** For example, on mother's day 2015, traffic northbound on harbor drive, turning left into cheesecake factory, was backed up down harbor and up Beryl to the extent that the intersection at Beryl and Catalina was gridlocked. How will the project mitigate this level of traffic.

The harbor area is not "freeway close." It's a long drive on surface streets now, and these surface streets have already gotten worse. Reducing Harbor drive to one lane has already changed my driving pattern. I drive on Harbor as little as possible now. If I'm going to the yacht club or bluewater grill, I come in on Herondo, if I'm going to Naja's, I take Catalina to Pacific avenue to the southern pier parking lot. I avoid harbor drive and the intersection at Beryl/Harbor as much as possible. **Will Harbor be widened back to 2 lanes in each direction?** This will get us back to 2014 traffic levels. What will be done to accomodate centercal traffic levels?

Was Harbor drive narrowed to 1 lane just so it can be widened for CenterCal, just so that CenterCal can show there is some mitigation for traffic in the artery? Seems like a waste of money.

Traffic in the south bay is, in fact, backed up for many miles, ewen to the 405. At morning rush hour, the

intersection at 190th and Inglewood is backed up to the west; at night, it's backed up to the north. **Will traffic be mitigated at these more distant arteries?**

Will anything be done to improve traffic at the offramps on the 405 at the south bay curve? They are all full now. At evening rush hour, the offramps on 405 north are full throughout the Curve. It can take 5 or 6 cycles of the traffic light to get off at Crenshaw. I work in long beach, and I often drive past the curve and get off at Hawthorne to avoid jammed offramps. Any further north, and I'm in heavy surface traffic coming from northrop and boeing. **Will anything be done to improve traffic flow from the 405 to the harbor?**

Will traffic flow be assessed and planned by an accredited traffic engineer? The current layout of harbor drive does not seem to have had that. Cars on harbor are going into bike lanes, and every intersection on Herondo has a different pattern of paint for the turning lanes. The area does not seem to have had the benefits of formal traffic analysis.

High speed road bikes prefer to travel on Harbor Drive with cars. **Will high speed road bike traffic be assessed separately**, in addition to foot traffic, strand cruiser bikes, and car traffic? How will it be handled in the area?

Response to Comment PC277-7

Please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR. As shown in the master response and Draft EIR, the proposed mitigations are associated with intersections and the approaches to the intersections where increase traffic impacts associated to the proposed project could occur.

As mentioned in mitigation measure MM TRA-2, an additional westbound and eastbound through lane would be added along Herondo/Anita Street. Additional mitigations include the addition of turn lanes at impacted intersections, but additional roadway widening is not expected, other than on Herondo/Anita Street. The project does not include widening Harbor Drive.

The comment also states that "traffic in the south bay is, in fact, backed up for many miles…Will traffic be mitigated at these more distance arteries?" The purpose of the Waterfront Draft EIR is to analyze the environmental impacts caused by the proposed project, not to mitigate existing environmental problems. (CEQA Guidelines Section 15125(a).) The intersection referenced in the comment is located more than two miles from the project site; please see Response to Comment PC246-1 for discussion of the geographic scope of the traffic analysis for the Waterfront Project.

Regarding impacts to off-ramps and Interstate 405, as shown in Section 3.13, a level of service (LOS) and queue analysis was conducted at six freeway ramp locations to determine future LOS and queuing conditions at the off-ramps as a result of traffic from the proposed project. As shown in Tables 3.13-25 and 3.13-32 in Section 3.13, all ramp intersections are projected to operate at LOS D or better during both peak hours for existing, existing plus project, future, and future plus project scenarios and mitigation at these freeway ramps is not required as part of this project. Additional information on the ramp analysis can be found in Appendix X-6, the Caltrans Memorandum, in Appendix L1 of the Draft EIR.

The traffic study associated with this project was performed by a registered traffic engineer. In addition, City roadway designs are reviewed and signed under the supervision of a registered traffic engineer. The commenter also asks about traffic conditions on mother's day associated with the cheesecake factory. The Draft EIR analyzes transportation impacts utilizing reasonable assumptions, including cumulative growth rates from the Southern California Association of Governments and the am and pm peak hours for the area. (See *also San*

Joaquin Raptor v. County of Merced (2007) 149 Cal.App.4th 645 [“Their argument is essentially that greater specificity was needed--i.e., that the EIR should have specified whether trucks sometimes enter and leave the site "unevenly" over time. We hold that such minute detail was not required in the analysis in question.”].) It is not feasible to analyze the peak hours of every individual business in the area; instead, the EIR utilizes the AM and PM peak hours for the area as a whole.

The proposed Pacific Avenue Reconnection includes a full-access roadway for vehicles with separated bicycle and pedestrian areas and designated crossings. These crossing locations would be designed to applicable standards and best practices, and would include elements such as high-visibility crosswalk markings at all crossing locations, and raised crosswalks (where feasible). Pedestrian crossings along the Pacific Avenue Reconnection will provide sufficient capacity to accommodate the added pedestrian volumes based on the design of those facilities. The proposed project would also create a more typical four-way perpendicular intersection geometry for the intersection of Pacific Avenue and Harbor Drive compared with the existing condition, which has a near 270 degree turn from the southbound Harbor Drive to northbound Pacific Avenue. Please also see Response to Comment PC323-107 for discussion of bicyclists and Harbor Drive.

Comment PC277-8

I’ve asked a lot about heavy traffic on peak days. I’m also worried about low traffic on cold winter days. A normal outdoor shopping mall can expect reduced business on colder days. **What level of business is expected on a rainy winter weekday?** How many people will be eating lunch or dinner or shopping on a cold winter tuesday? As I said above, I worked at TRW for 17 years. We rarely took the time to drive all the way to a beachfront restaruant for lunch; that was a 2 hour lunch, and there are lots of good places to eat on Artesia. **How will restaurants and shops survive a cold winter?**

Will there be any mix of offices in the plan? Offices near restaurants and retail can provide year round core customers and keep an area alive. I work in Douglas Park in Long Beach; the Hamburger Habit in the office park is the busiest in the nation, year round.

What will the cost of office space square footage be, compared to the rest of Redondo?

There is office space nearby, at Catalina and Francisca. Occupancy there has been low. I have twice tried to convince partners to open an office there. When I was dealing with local partners, they found the space too expensive per square foot. When I was dealing with partners further away (from outside the south bay, they’d have to take the 405 to get there), they found it far too far from the 405. **What will make office space in the CenterCal project succeed where this space hasn’t?**

The Pike in Long Beach is close to freeways and major arteries, yet occupancy seems low, foot traffic seems low. **What will make CenterCal more successful than the Pike?**

There are offices, shops, and restaurants at the head of the pier now, above the parking garage. They are not heavily used, they are hard to find. **What will make CenterCal more successful than this area?**

Will there be any electric car chargers in the new parking facilities?

Response to Comment PC277-8

The proposed project would include some office uses as described in Section 2.4 of Chapter 2, Project Description of the Draft EIR. The focus of CEQA, and hence the Draft EIR, are environmental impacts and not economics (e.g., office lease rates). The details requested by the commenter on office lease fees have not been

determined, as the proposed project has not been approved or final design completed.
Regarding economic viability and seasonality, see Chapter 5, Other CEQA Considerations of the Draft EIR and Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

Electric car chargers would be provided in the on-site parking facilities.

Comment PC277-9

The Shade hotel took much longer to build and open than planned. There are old railroad beds in the area, and once clear of that, the ground may require deep pilings. **Have these recently discovered costs and factors been included in building costs and schedules?**

Response to Comment PC277-9

The focus of CEQA, and hence the Draft EIR, are environmental impacts and not economics and the information requested by the commenter on building costs and schedules have not been determined, as the proposed project has not been approved or final design completed.

Comment PC277-10

Maintenance on the boat hoist was not performed properly during the years it was privately managed. That was a "public private partnership" similar to what is proposed by CenterCal. When that partnership failed, the city took the hoist over, and took nearly a year to repair it. There was no way to launch a boat in the harbor from November 2014 to October 2015. The city's estimates of repair schedule were poor; the website estimates were ususally "next month or two" when in fact repairs took nearly a year. **How will the proposed drawbridge be better managed than the hoist?** How can we be assured that Centercal will perform proper maintence on the drawbridge and the city won't be left trying to repair the drawbridge? It will be harder to design, build, and maintain, it will be harder to get bids on. The hoist is relatively straightforward; most industrial buildings and warehouses have overhead cranes similar to the hoist. A drawbridge seems much more unique and dramatically harder to maintain. If it took the city months to get bids on a simple hoist, the drawbridge will be much worse.

Response to Comment PC277-10

Responsibility for maintenance of all facilities would be part of the final agreement between the City and the developer. The proposed bridge design is a relatively simple design that incorporates backup systems for ease of maintenance for on-site management staff.

Comment PC277-11

Why is there no master plan for the harbor area, including the AES site?

Response to Comment PC277-11

See Section 2.1.1.5 in Chapter 2, Project Description and Section 3.9, Land Use and Planning of the Draft EIR, for information on City plans that include and/or focus on the City's harbor area. This includes the City's General Plan, Local Coastal Plan, Harbor/Civic Center Specific Plan, which were substantially amended from 2003 – 2010 and approved by voters under Measure G, and the Harbor/Pier Area Guiding Principles and Harbor Business Enterprise Plan developed in 2006 and 2010 respectively. Please also see Master Response #1: AES Power Plant Site.

Comment PC277-12

If the Sportfishing pier is removed, will there be any Sportfishing party boats or whale watching boats in the harbor?

If sportfishing is not publicly available, will "sportfishing" be removed from the Redondo gateway sign at Catalina and PCH?

If sportfishing party boats are removed or reduced, will there be a bait barge in the harbor? We can barely sustain one now, it basically exists to serve the sportfishing boats, with very limited hours, but live bait is important to california fishermen. Our style of fishing uses live bait heavily.

Response to Comment PC277-12

Opportunities for sportfishing and whale watching vessels would remain. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Comment PC277-13

It is said that "Legacy Tenants" will have the opportunity to move into the new market facility. **What will the increased cost per square footage be?** Will residents wanting to visit legacy tenants find themselves in tiny spaces or paying twice the price for a beer? **Will the cost of a beer be more or less than on the Hermosa Pier?**

Response to Comment PC277-13

Regarding retaining existing tenants at the project site, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Regarding costs, the focus of CEQA, and hence the Draft EIR, are environmental impacts and not economics. The information requested by the commenter on lease costs or lease locations have not been determined as the proposed project has not been approved or final design completed.

Comment PC277-14

What space will remain in the harbor for the Lanakila paddling club?

Response to Comment PC277-14

Lanakila Outrigger Canoe Club is located on Mole B, which is outside of the project area.

Comment PC277-15

How will bulding heights and density compare to the new shade hotel on Harbor? How will it compare to views from Catalina avenue? Can we expect views similar to the view at Catalina and Garnet?

Response to Comment PC277-15

The proposed project includes a variety of buildings with varying heights and massing located throughout the 36-acre project site. Information on the intensity and building heights under the proposed project is provided in the Draft EIR in Chapter 2, Project Description and Section 3.1, Aesthetics and Visual Resources.

The height of the proposed hotel and parking structure in the southern portion of the project site would be similar to the existing Pier Plaza development, and thus views from Catalina and Garnet would remain similar to the existing views. Please also see Master Response #9: View and Scale of Development.

COMMENT LETTER NO. PC278 LILLIAN LIGHT

Comment PC278-1

I very much oppose the CenterCal plan to double development on our beachfront which should be a place for swimmers, surfers, and beach recreation, not shoppers. 80 % of beach views will be stopped, traffic will increase, and parking will be a nightmare. I live in nearby Manhattan Beach, but I have enjoyed visiting the beach at Redondo. I will never shop there. The beach is not an appropriate place For a mall!!

Response to Comment PC278-1

To clarify, the beach is south of the project site and not within the project site. Please refer to the Master Response #9: Views and Scale of Development, Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, and Master Response #7: Waterfront Parking regarding parking. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC279 BARBARA EPSTEIN

Comment PC279-1

Last month I objected to the CenterCal project for many reasons:

* We came to live in Redondo Beach for the healthful exercise we enjoy on our daily walks around the pier and the waterfront, with fresh air, open spaces, views of sea, wildlife, and sky. We do not want wall-to-wall buildings at the waterfront. The density of this project will be claustrophobic.

* We participated in several planning workshops with the unfortunate result of all of our time, energy and hard work being ignored, leading us to realize that the workshops were nothing but a sham, and we had been victims of fraud and deception by the City Council majority and CenterCal, a shopping center developer. Clearly, the City Majority represents only special real estate interests in entering into this contract, not the residents who live at the waterfront.

* The City is giving valuable public property to a private company over the objections of many Redondo Beach citizens. This is immoral and possibly illegal. Today I will further object to this project: This Draft EIR is fatally flawed and should be discarded.

* Constructing a new public street for vehicular traffic will dictate that cars, trucks, and motorcycles will dominate the space between Torrance Boulevard and Harbor Drive, cutting off public access and reducing foot and bike traffic from Catalina Avenue. The public will lose the ability to walk freely from Czuleger Park, or from the hundreds of nearby residences, to the waterfront without crossing traffic. This street presents a safety hazard and objectionable barrier for the walking public.

* The noise coming from this new and unnecessary vehicular traffic will be a new and unreasonable burden for residents to bear.

* Traffic from Harbor Drive to Pacific Coast Highway and beyond will be unmanageable. Residents and visitors will be under stress trying to access the area.

* The hundreds of residents who live on the ocean side of Catalina now enjoy fresh air coming from the prevailing winds from the ocean. With the installation of a new public street these residents will now be subject to toxic fumes that is a serious health threat. We chose the location of our home very carefully to avoid these types of auto emissions.

* The CenterCal drawings that have been made available to the public, supposedly to view, remain vague and impossible to analyze. CenterCal never produced the three dimensional drawings they promised. The city has not required the usual silhouette, or skeleton, at the site, in order to display just how tall, just how wide, or just how massive this development will be.

* Recreation will be very negatively impacted in many ways.

The Seaside Lagoon will be diminished greatly, turning public parkland into commercial buildings for private profits. Those waterfront visitors who come to exercise, enjoy views, wildlife, and open sky will be confronted with unwelcome and inappropriate auto traffic, noise, auto emissions, and towering buildings, distracting from the pleasure of being at the seashore. Boaters and Boarders will find parking impossible for their boats and boards in a parking structure. Who wants to go boating and boarding in the middle of a mall like The Grove? Recreational enjoyment of the waterfront will be seriously reduced by this project.

* Land use. Residents want to retain the Waterfront for recreational boating, water sports, fishing, boarding, and passive relaxation. They have made it clear many times they do not want to live in or visit the Waterfront in order to shop, drive their cars, or go to the movies. Movie theaters do not belong in this area. Density is a serious problem in this plan. Through traffic is not appropriate in this waterfront area. These Environmental Impact workshops and the Draft Impact Report are clearly drafted to be just another fraud to pretend that the public is being included in this theft of their public land to benefit private gain.

This project needs to be cancelled, this EIR needs to be scrapped, and the City of Redondo Beach needs to look at forming a citizens committee to find the right land conservancies to help create a new and brilliant plan to fund and revitalize our waterfront. The City must include any citizen who wants to participate to be included in the planning.

The Public will not tolerate this fraud and theft of public parkland.

Response to Comment PC279-1

Comment PC279-1 is the same as Comments PC081-1 through PC081-9. Refer to Response to Comments PC081-1 through PC081-9, above.

COMMENT LETTER NO. PC280 BARBARA EPSTEIN

Comment PC280-1

I declare this DEIR null and void because of the clear conflicts of interest that I have witnessed in the relationships between The City of Redondo Beach, DEIR preparers, and the developer, CenterCal. These conflicts have made an objective evaluation by the EIR preparers impossible.

The presentations by the DEIR staff were blatant marketing displays prepared by CenterCal with the blessing of the city. Their purpose was clearly to sway the public to support this project, not to present necessary facts.

There are many errors in the DEIR that I have previously addressed in earlier documents.

The city and developer deceiving the public that they were truly participating in the project planning process when they were not have fatally flawed the entire public participation process. The city and the developers conspired to perpetrate this fraud with the support of the Chamber of Commerce. This DEIR report is part of the fraud, fooling the public once again.

The residents of Redondo Beach have been denied due process in this city by their valid concerns being ignored, marginalized or dismissed out of hand. In many instances the residents were insulted and humiliated by members of the City Council when attempting to pursue their rights to petition their government.

We reject this flawed document in its entirety.

We reject this project as a taking of public land by private business interests.

The citizens of Redondo Beach will retain ownership and control of their public land, meet and plan with expert consultants to fund, plan, and create their own vision to refurbish, retrofit, and create a beautiful waterfront for all to enjoy.

Response to Comment PC280-1

The Waterfront Draft EIR was prepared in full accordance with the requirements of CEQA. Pursuant to Section 15084(d)(2) of the State CEQA Guidelines, the City of Redondo Beach, as Lead Agency for the project, chose to contract with a private entity, in this case the firm CDM Smith and subconsultants (see Chapter 7 of Draft EIR for a list of the consultant team members), to prepare the Draft EIR and, pursuant to Section 15084(e), conducted its own review and analysis of the information developed by the CDM Smith consultant team before using the information. The Waterfront Draft EIR that was sent out for public review reflects the independent judgment of the City of Redondo Beach. The City is responsible for the adequacy and objectivity of the Draft EIR.

The commenter provides no specifics or scientific basis for their assertions that the Draft EIR is flawed. The comment also asserts that the project will result in the taking of public land by a private business interest. Please see Draft EIR page 3.9-29 in Section 3.9, Land Use and Planning, which discusses permissible actions within the City's tidelands grant, which includes leaseholds. Your comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC281 CAROL SOMMERS

Comment PC281-1

The residents of Redondo Beach do not want a "mega" waterfront. Not only does a commercialized, mega waterfront project with malls, massive parking structure, and hotels etc destroy our beautiful beach community and the current view/skyline - it threatens our way of life that we have created in the Redondo Beach community. Redondo Beach is a special place to live and raise a family - which I am doing. Residents already voted no and this is a bypass of the will of the people who fund the community with their tax dollars. Further, as someone who has lived on South Broadway between Emerald and Pearl, I have already watched the degradation of my specific neighborhood with excessive traffic and noise.

Redondo Beach residents do not want to be the Long Beach port of the South Bay. Please work with developers to revitalize and enhance, not destroy our community. A drastically reduced footprint is warranted.

Please call me/email me with further questions.

Response to Comment PC281-1

With regards to the proposed project and development at the project site, the commenter is incorrect that the residents already voted no. As discussed in Draft EIR Section 2.1.1.5.8 in Chapter 2, Project Description, the zoning for project site has been the subject of numerous public hearings since 2007, which included approval from the Redondo Beach Planning Commission, Harbor Commission, City Council, the California Coastal Commission, and the Redondo Beach electorate (Measure G), which decided to approve a 400,000 square foot development cap (a reduction from the 750,000 which was originally proposed). As discussed in the April 8, 2008 report prepared for the City Council public hearing on the zoning for the project site: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.) As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher FARS than auto-oriented centers… a low FAR may not achieve the character and amenities desired for the Harbor area, and too low an FAR is not likely to result in a pedestrian-active character." For discussion of traffic and noise please see Draft EIR Sections 3.13 and 3.10. The Draft EIR also included analysis of a reduce density alternative, as described in Draft EIR Chapter 4, Analysis of Alternatives.

COMMENT LETTER NO. PC282 STEVE SADD

Comment PC282-1

I love eating at Polly's (last time was just a few weeks ago). Please make all efforts to preserve this business and neighborhood icon and allow it to continue to serve the public. Its loss would hurt the culture of the neighborhood.

Response to Comment PC282-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC283 LISA RODRIGUEZ

Comment PC283-1

Thanks for holding public hearings and allowing engaged dialogue from residents and concerned citizens.

I am in favor of Revitalizing Redondo Beach: our Pier and Harbor are in dire need of repairs, our locals in need of vibrancy and our businesses deserve a thriving economy. I support the efforts to keep this process moving forward, it is a complicated and expensive endeavor. I applaud The Waterfront developers CenterCal for being selected by our City Council as one of a handful proposals accepted. I'm glad for the opportunity we have with this investor and appreciate that it is not proposed at 100% build out of what Measure G allows.

I realize there are several alternatives to consider and that there is much room for collaborating an outcome that will be the PRIDE of the South Bay.

In reading through the Summary and seeing the proposed plans, I discovered a few impacts I'd like to see addressed:

First: In creating a "lifestyle center" - I noticed two options for the Sports Fishing Pier...to remove it or to re-do it. Please make sure this very important component is added back into the equation and ON your schematics and back onto the drawing board. I SUPPORT SAVING THE PIER - and the direct access to the water that it has provided and will continue to do so for locals and visitors to come. This area is a HARBOR first and foremost and the activities preserved as such.

Response to Comment PC283-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Comment PC283-2

SECOND: Logistically, I find flaws with the location of the Hand Launch Area. There is much excitement about opening up Sea Side Lagoon, but there does not seem to be an access road/route or easy unload for Kayaks, SUPs, Canoes, Dinghys to launch from the proposed east side of the lagoon. Please realize that these activities need drop off area and availability for temporary loading and unloading. It is not feasible to carry these items and gear from the current parking/access. Please evaluate the option of hand launch nearer to the boat launch. There should be more studies about the accessibility for waterfront activities involving ease of access to ocean over the accessibility for shopping and restaurants.

Response to Comment PC283-2

The road (portion of the new main street) and parking stalls located within the park area would provide Seaside Lagoon access, including provisions for designated short-term loading and unloading of other recreational equipment/supplies at the park (i.e., dropping off coolers, paddleboards, passengers, etc.), and handicapped access.

Comment PC283-3

THIRD: To mitigate traffic and safety along the Pacific Avenue Reconnection Road, please consider incorporating a Red Car Trolley - Rubber Tire Bus Trolley, similar to San Pedro where pick up from Torrance Blvd turnabout to the North Side of the project. Encourages Bike-able, Walk-able community. Possibly a coalition from the Hotels, Restaurants, Shops to keep this hop on/off option free to utilize to eliminate the number of vehicles passing through and allowing a more pedestrian friendly gateway. Be sure to make all pedestrian crosses UNDER the road, so that two way traffic along Pacific Ave may flow without the risk of pedestrian crossing as distracted driving and walking becomes more commonplace. (I can envision that crossing on top will create a safety hazard at the speeds currently allowed).

Response to Comment PC283-3

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR. The commenter also suggests "trolley car." As noted, in Draft EIR Section 3.13.2.3.4, the project site is well served by transit service under existing conditions, and providing a short distance people mover through the project site, is not expected to affect transportation mode choice for the site's visitors (i.e. vehicle, bus, bike, or pedestrian access). Individuals who utilize the project are not expected to utilize vehicular transportation once they arrive at the project site; as also outlined in Section 3.13, Traffic and Transportation, the project includes a number of pedestrian and bicycle facility improvements. The comment also suggests safety concerns with pedestrian crossings with the Pacific Avenue Reconnection. Please see Response to Comment PC081-2, which addresses this issue.

Comment PC283-4

FOURTH: By encouraging walk able, bike able Waterfront and creating a tram, trolley, bus system...it could mitigate number of vehicles parking directly at site (marketplace center). I believe the biggest contention and impact is the aesthetic visuals that a multi-story parking lot creates right in viewpoint of the neighboring hotels, who have been long supporters of our community. Please work on creative ways to mitigate the number of vehicles parking and find alternatives to reduce an entire level and you may find far more support for the compromise made. (Even if that means significantly reducing the 700 seat theatre proposed - which may be difficult to sustain). As a long term resident - we value the outdoor amphitheaters to watch sunset or experience the sea breeze, sounds, etc. over indoor venues...we lost our outdoor summer concerts at Veterans Park nearly 10 years ago and nothing has brought all ages and generations together quite the same.

Response to Comment PC283-4

Your opinions are noted. Please refer to Master Response #7: Waterfront Parking and Response to Comment PC272-1

Comment PC283-5

FIFTH: By opening Sea Side Lagoon, mitigation measures will need to be in place for our sea lions that will no doubt make this new entry their home. Building out a barge or an area that they may adopt as their own, may keep them from squatting on the newly accessible beachfront. They are state protected, so the impacts on the interactions could be problematic.

Response to Comment PC283-5

Section 3.3, Biological Resources of the Draft EIR addresses the potential for sea lions to utilize the proposed seaside lagoon. As discussed therein, it is anticipated that sea lions would prefer to utilize other areas, away from human activity; however, the City is proposing Condition of Approval COA BIO-3: Marine Mammal Management Program, which includes measures to deter pinnipeds (sea lions) from establishing a regular presence in the lagoon or immediate vicinity. Please also note that in 2015 the City also installed a floating barge for pinnipeds, which replaced the barge that sank in 2013. (See Draft EIR page 3.3-24.)

Comment PC283-6

I am in favor of responsibly revitalizing this area. Please do the right things by taking into consideration the modifications that will produce the perfect fit in this intricate puzzle.

Thank you for your considerations.

Response to Comment PC283-6

Your opinion and comments will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC284 MARTY FALK

Comment PC284-1

The draft EIR for the proposed waterfront project and public boat launch ramp fails to address several

issues, as follows:

1. There is no current demand study included in this Boat Ramp Analysis, but in prior studies there were predicated demand/usage numbers estimated.

There is no comment regarding these prior demand studies, or a current demand estimate. The only reference is to the number of uses of the old hoists. The hoists' weight limits prevented many larger trailered vessels from utilization of those hoists. There is far greater demand than JUST that from the size boats that use the hoists.

Demand will clearly drive estimates for amount of needed boat/trailer parking - 20 forty-foot parking spaces doesn't even begin to meet the demand demonstrated by the prior studies.

A Tahoe towing vehicle is 17 feet long before you add the trailer hitch. A Suburban is 20 inches longer. The total allowed length for a boat trailer is 40 feet. Maximum allowed length for boat + trailer is 65 feet. Clearly almost any size tow vehicle and trailer will have to occupy two spaces. Thus on the DEIR drawing they are already down to 10 parking spaces for the public ramp? TEN? Even double that - TWENTY - will not begin to meet demand.

Please have the consultants address the demand and parking space available for boat+trailer combo, including the demand for vessels that are too large to utilize the current hoists.

2. There is no mention at all of the lost tenant parking – for those who have their vessels in slips adjacent Mole A – Docks G, H, I & J. There are 100+ vessels moored on those four docks with owners who come to their boat via car or truck.

Case authority points out that cars and other vehicles are physical objects that occupy space when driven and when parked. Therefore they MUST have some impact on the physical environment. But there is no mention and no mention about what should be done in mitigation of this impact. Please address this tenant parking issue and how it will be resolved for those 100+ boat owners.

3. There is no mention of the hazard present or mitigation of the 1-4 inches of sand that covers the roadway access to Mole A every time the wind blows 15-20 knots plus, year-round. This causes even regular vehicles to slip and slide, right at the northern & easternmost terminus of the breakwater, where surfers, bikers, skaters and walkers stand to watch the waves and surfers directly west of The Chart House. Please have the draft EIR address who will be responsible for prompt remediation of the unsafe road conditions - which, at present, are allowed to remain for up to a week at a time.

Response to Comment PC284-1

The proposed project does not propose a boat ramp at Mole A (the proposed project's boat ramp is included at Mole C). However, the Draft EIR does analyze several different alternative locations for the boat ramp, including Mole A. (See Chapter 4, Analysis of Alternatives - Alternative 8 of the Draft EIR.) The commenter implies that trucks carrying boats to Mole A have a difficult time navigating Yacht Club Way. This road has been utilized by the existing yacht club for over 50 years. As shown on Figures 4-5a through 4-5c, the Alternative 8 – Mole A options include a 60 foot radius roundabout at each end of the proposed Mole A facility, which would improve vehicle access and safety in comparison to existing conditions. The commenter states an opinion/preference relevant to the boat ramp alternative location. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding the boat ramp, including parking at Mole A. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC285 BARBARA BURKE

Comment PC285-1

I would like to voice my opinion concerning the renovation of the Redondo Beach Pier. It is a must that this renovation move forward for the residents of Redondo Beach. I moved to the Esplanade June 2014 from Newport Beach. I moved to the area because my son has been a home owner in Redondo since 2005 and I wanted to be closer to him.

I was really surprised to see how the Pier is falling apart in appearance and love from the community!! I still walk the Pier once a week and buy fish BUT it is usually deserted except for weekends. The weekends bring people to the ocean not the Pier. The joggers and bicyclist are coming from Hermosa and Manhattan Beach just passing through AND people from Redondo are going to Hermosa and Manhattan Beach for fun.

If the old and closed mind people holding up this project does not see the light for the next generation it is really, really sad. A house will not stand forever…it will always need renovation …or be torn down and a new one built. That is called progress.

Please keep the residents of Redondo Beach in their city and make them proud to take their visitors and family to the Pier.

Response to Comment PC285-1

Your opinion and comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC286 LORI ZAREMSKI

Comment PC286-1

I am writing this letter to express my grave concerns regarding the EIR related to the Center Cal project. The EIR does not address the significant negative impacts that can clearly be predicted. The city appears to be rubber stamping this project that is all wrong for our community.

First the traffic and car exhaust will be tremendous. The entrance and exit will be jammed in a confined area. The traffic will be so congested with a concentration of car exhaust that will be very unhealthy.

Response to Comment PC286-1

Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Detailed information on traffic can be found in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR.

Draft EIR Chapter 3.2 analyzed air quality impacts and disclosed significant impacts associated with construction. However, impacts with respect to operational car exhaust are discussed in detail in Section 3.2 Air Quality and were determined to be less than significant. Specifically in Impact AQ-1, Violation of Air Quality Standards – Operational, starting on page 3.2-38 and Impact AQ-2, CO Hotspots starting on page 3.2-41. With respect to operational emissions, mobile sources (car exhaust) are taken into account with respect to the emissions estimates. As shown on table 3.2-10 Proposed Project Operational Emissions mobile sources, when combined with other operational emission sources, will not exceed the air

quality significance thresholds for any of the criteria pollutants. Additionally, the potential for the increased operational vehicle traffic to result in CO hotspots that could pose a health risk to local residents was discussed in detail in Impact AQ-3. As detailed, the increased peak hour traffic would not result in a CO hotspot and impacts would be less than significant.

Comment PC286-2

Secondly, the seaside lagoon will be shrunk in size with the diesel polluted water increasing the chances for children to contract illness.

Response to Comment PC286-2

Please refer to the Master Response #4: Modifications to the Seaside Lagoon.

Comment PC286-3

In addition, the bike path will become so dangerous that people will not be able to utilize it thus encouraging even more car trips.

Response to Comment PC286-3

As detailed in Section 3.13, Traffic and Transportation of the Draft EIR, implementation of the proposed project would enhance both existing and planned pedestrian and bicycle facilities through and adjacent to the project site. As described on page 2-71 of the Draft EIR, the project includes several new bike paths, one that is located along the Pacific Avenue Reconnection (see Figure 2-19 on page 2-73) and would be an extension of the Herondo-Harbor Gateway cycle track that has recently been completed as a component of the Harbor/Herondo Gateway Improvement Project. Another would travel through the interior of the project site. As shown on Figure 2-20 (page 2-74 of the Draft EIR), the proposed project also includes new pedestrian pathways throughout the project site, including along the Pacific Avenue Reconnection. In addition, Section 3.13, Traffic and Transportation of the Draft EIR, detailed bicycle and pedestrian safety related to the proposed project. The Impact TRA-3 analysis (beginning on page 3.13-80 of the Draft EIR) addressed the potential to impact pedestrian and bicycle facilities and conditions and found that implementation of the proposed project would enhance both existing and planned pedestrian and bicycle facilities through and adjacent to the project site. While the project will introduce new vehicular crossing locations for pedestrian associated with the Pacific Avenue Reconnection, and additional driveway locations on Harbor Drive, these crossing locations would be designed to applicable standards and best practices, and would include elements such as high visibility crosswalk markings at all crossing locations, and raised crosswalks. Based on the discussion in Section 3.13 of the Draft EIR, the proposed project: (1) would not disrupt existing pedestrian or bicycle facilities; (2) would provide for pedestrian, bicycle, and roadway facilities that are designed with applicable design standards; and (3) would not substantially increase hazards due to design features or incompatible uses. The proposed project would improve bicycle and pedestrian connections throughout the site, but especially by eliminating the pathway through the Pier Parking Structure, which currently includes vehicular and bicycle interactions under existing conditions (Table 2-2, page 2-46 of the Draft EIR). As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact pedestrian and bicycle modes.

Please also see Response to Comment PC081-2.

Comment PC286-4

The ocean view that belongs to the public that provides access to natural beauty that is beneficial to the mental health of the general public will be destroyed.

Response to Comment PC286-4

The commenter's opinion is noted. As discussed on Draft EIR page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

Impacts to views are addressed under Impact AES-1. Figures 3.1-7 and 3.1-11 provide illustrations of the proposed changes in comparison to existing conditions along with a description of the proposed changes. Changes to the site's visual character are analyzed under Impact AES-2, with discussion of the northern portion of the project starting on page 3.1-53. The visual simulation is also presented in Figure 3.1-17 on page 3.1-58 of the Draft EIR illustrates the size and scale of project-related structures proposed along the west side of Harbor Drive extending south from Portofino Way. The information provided in the Draft EIR is sufficient for disclosing the impacts of the project and decision-making purposes. Please also see Master Response #9: Views and Scale of Development.

Comment PC286-5

The noise and light pollution that will result from this poorly conceived and drastically oversized project will decrease the quality of life and health for Redondo Beach residents.

Response to Comment PC286-5

Refer to Section 3.10, Noise and Section 3.1, Aesthetics and Visual Resources, for detailed information on the proposed project related to noise and light, respectively.

Comment PC286-6

Please listen to the valid concerns of the residents and start over. The current project is a horrible mistake and has not been properly researched.

Response to Comment PC286-6

The commenter has provided general information that does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC287 GRETCHEN LLOYD

Comment PC287-1

How will decreasing the amount of boat slips impact the future use of the Harbor. Is this the best use of our Harbor as a Harbor.

Response to Comment PC287-1

Section 3.12, Recreation of the Draft EIR (beginning on 3.12-39) addresses the slips associated with the proposed project's reconstruction of the Redondo Beach Marina in Basin 3, as well as Response to Comment PC323-73.

COMMENT LETTER NO. PC288 DAVID BRAND

Comment PC288-1

Please keep Sportfishing in Redondo Beach.

This is a great for families and friends.

Thank you

Response to Comment PC288-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC289 RUTH & MARK SCRUTON

Comment PC289-1

My husband and I are avid deep sea sport fisherman. We go out of the Redondo Beach as much as possible, that's our favorite spot to depart from the LA area.

San Diego is another we go out but that's so far of a drive from us living I'm the San Fernando Valley. We don't want to drive that far.

Redondo Beach is more affordable and easy to get to a win win situation. Please keep us fishing in the LA area.

Response to Comment PC289-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC290 BOB MACKIE

Comment PC290-1

Sport fishing and Redondo Beach have been synonymous for many generations. Close proximity to Redondo Canyon makes this experience unique and special. Let's make sure that future generations can continue to participate and enjoy sport fishing departing from Redondo Beach.

Response to Comment PC290-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the

City's decision-making body.

COMMENT LETTER NO. PC291 ROBERT KING

Comment PC291-1

My family and I have been fishing with Redondo Beach Sportfishing for well over 40 years. My son learned how to fish on the Blackjack Sportfishing boat back in the mid 80's. My daughter learned how to fish in the mid 90's on the Redondo Beach Special. Now just last winter my wife learned how to fish on the Indian Sportfishing boat.

I was born and raised in the South Bay but ended up morning to the Santa Clarita Valley in the late 90's. We still drive the 45-60 minutes to Redondo to go fishing almost every weekend. We also frequent the local businesses at that time. Annually we spend anywhere from $10,000 to $35,000 in the Redondo community. So please do not close Redondo Beach Sportfishing.

Response to Comment PC291-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC292 MARCI O'BRIEN

Comment PC292-1

My name is Marci O'Brien & I want to publicly state that I approve of the Waterfront Development project that Center Cal is proposing. Please let me know if there is anything else you need from me.

Response to Comment PC292-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC293 LAUREN COTNER

Comment PC293-1

I am a 4th generation South Bay girl. I lived many years in Redondo and now nearby Torrance, I also work in Redondo Beach and sell many homes in Redondo

The Waterfront concept as seen is Amazing and would revitalize a dilapidated pier and surrounding businesses.

Redondo could once again become a destination. Remember in the coming years there expected to be less cars, as many people will be using ride share. I honestly don't see traffic impacted.

I wouldn't have to go to Surrounding areas for entertainment and fine dining.

I can't wait. When are you going to start?

Response to Comment PC293-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC294 KOOGUY

Comment PC294-1

Please don't let the Indian, or Redondo Special go away. It's a part of life and we grew up with their deck hands and captains. We are like a family, and would make some of us that live locally drive further.

Response to Comment PC294-1

The discussion of "the Indian" appears to be a referring to one of the charters from the Sportfishing Pier. Refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on existing businesses. The comment is acknowledged and these comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC295 CURT REA

Comment PC295-1

Redondo sportfishing has been here all my life and needs to remain a part of our rich culture please!

Response to Comment PC295-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC296 CHARLIE PICCARO

Comment PC296-1

I've been getting on fishing boats off the pier since I was a kid. It would be a shame if kids missed that opportunity.

Response to Comment PC296-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC297 MARY EWELL

Comment PC297-1

3.9 Land Use and Planning (2.6 MB)

The overarching concern for the City of Redondo Beach and CenterCal as co-applicants to this proposal is the piecemeal development that is under the city's auspices. There appears to be no cohesive plan that covers the Lagado, the Knob Hill school site, and the waterfront mall development -- the latter two under the protection of

the Coastal Commission. Please do not even consider removing these from the State and Coastal Commission's jurisdiction. Alternative to -- no project -- necessary infrastructure improvements. The foregoing alternative is necessary until there is the additional mitigation of an inclusive master building plan that is visionary in providing for the majority of the taxpayers who assume the burden as well as providing "for our common home", our natural resources at the Waterfront.

Response to Comment PC297-1

See Section 2.1.1.5 in Chapter 2, Project Description and Section 3.9, Land Use and Planning of the Draft EIR, for information on planning efforts that have included the City's harbor area as well as other portions of the City. This includes the City's General Plan, which provides a blueprint for development throughout the entire City and the Local Coastal Plan, which includes all areas west of the Pacific Coast Highway. As described in Section 3.9.3.3.2 of the Draft EIR, the project site is located within the coastal zone and as such is subject to the City's Local Coastal Program (LCP) that has been certified by the California Coastal Commission and approved by the Redondo Beach electorate (Measure G), the Planning Commission, the Harbor Commission, and the City Council. All development at the project site requires a coastal development permit, pursuant to the LCP. No change in the boundaries or other amendments to the LCP have been proposed under the project. The proposed project is consistent with existing City- and area-wide planning documents and no additional planning is required. Regarding natural resources at the waterfront, please see Section 3.3 Biological Resources of the Draft EIR.

Comment PC297-2

Redondo Beach is notably "park poor" and that comparison to other cities already includes the beach to defend itself against not providing enough walking park space. To commercialize the waterfront with three high-end "boutiques" and parking structures to service this commercial enterprise is indefensible.

Response to Comment PC297-2

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. The proposed project would not alter the existing parkland ratio but would provide enhanced high-quality open space, including an enhanced waterfront boardwalk, as described in Section 3.12, Recreation.

Comment PC297-3

Mole D, the Tidelands owned by the State and granted to the City of Redondo Beach is the most vulnerable. Basin 3, the uplands, in exchange for Mole D, so that CenterCal can build the market square portion of the development in the tidelands location is unacceptable; publicly-owned land should not be used for commercial development purposes. Once the Tidelands are no longer under the grant conditions of the State of California, they are open to be reduced/removed/ruined by CenterCal. The exchange of lands will violate conditions of the grant Chapter 57 and Sections 6307. By taking Tidelands and the Breakwaters that protects those Tidelands away where people can fish, walk, and enjoy nature.

Response to Comment PC297-3

The comment asserts that the proposed development would be inconsistent with the City's Tidelands grant. As discussed in Section 3.9.4.3.2 in Section 3.9, Land Use and Planning, allowable uses in the tidelands include visitor-serving uses such as commercial uses, restaurants, and hotels, which would include a use such as the proposed market hall. As also discussed on Draft EIR page 3.9-29 (as clarified in the Final EIR Chapter 3, Modifications to the Draft EIR):

> The Tidelands Grant to the City of Redondo Beach allows for a number of uses. The Tidelands grant provides for "the establishment, improvement, and conduct of harbors, and for the construction, reconstruction, repair, maintenance, and operation of wharves, docks, piers slips, quays, and all other works, buildings, facilities, utilities, structures, and appliances incidental, necessary, or convenient ~~convenience~~, for the promotion and accommodation of commerce and navigation...For all marine-oriented commercial and industrial uses and purposes, and the construction, reconstruction, repair, and maintenance of marine-oriented commercial and industrial buildings, plans, and facilities…public parks, public playgrounds, public bathhouses, public bathing facilities, public recreation, snackbars, cafes, cocktail lounges, restaurants, motels, hotels…launching ramps and hoists…" (Tidelands Grant, Senate Bill 1461, Section 2.) The Tidelands Grant also allows the City to "…lease said lands or any part thereof for limited periods, for purposes consistent with the trusts..."
>
> The proposed uses on Tidelands implemented under the proposed project would be consistent with the permissible uses under the City's Tidelands Grant, however, the applicant has requested a 99-year lease for portions of the site that are currently Tidelands. As discussed in greater detail under Alternative 4, in Chapter 4, Analysis of Alternatives in this Draft EIR, in the event that the Tidelands Exchange is not approved by the CSLC, the uses proposed for the site would still be consistent with the Tidelands Grant, however the lease agreement for the Tidelands identified in the exchange would be limited to 66 years.

Regardless of the uplands or tidelands designation, the City would continue to control the land and CenterCal would be subject to lease terms with the City. The land would continue to be subject to the current City planning documents that govern the uses and the allowed development intensity, including the City's LCP certified by the California Coastal Commission (see Section 3.9 Land Use and Planning for additional information).

As described in Section 3.9, Land Use and Planning, the proposed exchange of the land would be subject to approval by the State Lands Commission, which, as part of the review process, would review the proposed exchange for consistency with Public Resources Code Sections 6307.

The proposed land exchange would not remove breakwaters, nor would it remove coastal zone or other land use protections for the area. As described in Chapter 2, public open space, including waterfront boardwalks would remain where people can continue to walk and enjoy nature. Fishing would continue to be allowed from designated areas.

Comment PC297-4

By destroying the habitat of sea creatures, this contradicts and nullifies the 2005 Beach Bluff Restoration Project Master Plan. This plan was prepared with funding from California Proposition 12, administered by the California Coastal Conservancy and the Santa Monica Restoration Committee by a grant to the Conservation Corps in the Urban Wild Lands Group. This plan was prepared with the Project's Steering Committee in Redondo Beach, California; significant additional funding was provided by a grant from the City of Redondo Beach. You may download a copy of this plan from: http://www.urbanwildlands.org/bbrp.html

Response to Comment PC297-4

As described in Section 3.3 Biological Resources of the Draft EIR, with implementation of the mitigation, the proposed project would have less significant impacts on biological resources, including marine animals. Further, as described in Section 3.3, there are no beaches or beach bluffs located within the project site, and as such, the project site is not located within the boundaries of the Beach Bluffs

Restoration Project (see Figure 1 of the Beach Bluffs Restoration Project Master Plan).[37] In addition, this master plan has not been officially adopted by the City**.** As also discussed on the website referenced by the commenter "The BBRP pilot restoration project will be located on *County land* in Redondo Beach…"

Comment PC297-5

Other factors not considered adequately in the EIR:

- Sierra Club letter from Sacramento, January 16, 2016: "Exercising the courage to say no" states that one of the key issues in climate change is dangerously rising sea levels
- A high-surf advisory warning has been in effect for the past 10 to 12 days
- The flooding at the Pier in the past warns us of the possibility of occurring again.
- The need for NOAA (National Oceanic and Atmospheric Administration) to review the conditions of the development proposal; see attached pages 1-7.

Response to Comment PC297-5

Sea level rise and inundation from high tides and wave uprush are addressed in Section 3.8 Hydrology and Water Quality of the Draft EIR. The commenter has provided general information that does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

No attachment related to NOAA was provided as part of Comment Letter PC297, however the attachment was provided with PC527. A Notice of Availability, Notice of Notice of Completion, and Notice of Public and Agency Review and Comment Period for The Waterfront Project and DVD of the Draft EIR were sent to the National Marine Fisheries Service in November 2015, a division of NOAA. No comments were received.

Comment PC297-6

Conclusion: Alternative 4 --no property exchange with the State.

The State only allows a 65-year lease; CenterCal wants a 99-year lease on this property. It leaves this land exchange vulnerable to whomever CenterCal sells the property (or the Bank/Lender should CenterCal declare bankruptcy, which they are liable to do at their 10% profit requirement). An unknown buyer, not required to be a citizen of the United States, would have an undetermined timeline of control over the land which is integral to the structural integrity of the Waterfront. The Tidelands and Uplands both deserve the protection of the State of California so as to prevent a land exchange detrimental to it.

Why were strict protections for these lands not addressed in the EIR draft? The taxpayers, property-owning residence, own Basin 3, but their collective wishes, as represented in eight public meetings over a two-year period where they asked for a smaller project than CenterCal demanded., have been ignored. Why was CenterCal's design allowed to move forward without modification? Rather, their design has expanded. Why was a three-dimensional model not provided by CenterCal after formal City Council and citizen request over a two and a half year period?

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[37] Beach Bluffs Restoration Project Steering Committee. 2005. Beach Bluffs Restoration Master Plan. April. Available at: http://www.urbanwildlands.org/Resources/BBRPmasterplan.pdf

Mitigation: many residents would support a Bond measure to defray the cost of the parking/infrastructure repairs rather than have two above-ground, two- and three-story parking structures which will 80% of the view and obfuscate the possible ambience of a smaller scale pier/harbor redevelopment that could be agree on.

Response to Comment PC297-6

See Response to Comment PC297-3 above regarding the proposed land exchange.

As described in Section 3.9, Land Use and Planning in the Draft EIR, the proposed project is consistent with the development standards for the project site set forth in applicable land use planning documents, including the General Plan, LCP, and Coastal Zoning.

The video prepared by CenterCal (available at http://www.thewaterfrontredondo.com/the-plan.php#video) includes a computer 3D model of the proposed project. In addition, simulations used in Section 3.1, Aesthetics and Visual Resources of the Draft EIR (see Figures 3.1-7 through 3.1-23) used to analyze the aesthetics and visual resources impacts that could result from the proposed project were based on the peered reviewed 3D computer model.

The commenter also asserts that the public has demanded a smaller project. As discussed in Draft EIR Section 2.1.1.5.8 in Chapter 2 and Section 3.9, Land Use, the proposed development is consistent with the amount of development allowed under the Coastal Zoning, which was considered and approved by the Redondo Beach Planning Commission, Harbor Commission, City Council, the California Coastal Commission, and the Redondo Beach electorate (Measure G) between 2008 and 2010. The Coastal Zoning allows for 400,000 square feet of net new development within the Coastal Commercial zoned areas of the City based on existing land uses on April 22, 2008 (a reduction from the 750,000, which was originally proposed). As described in Draft EIR Table 2-5 and updated in Chapter 3, Modifications to the Draft EIR in the Final EIR, the proposed project includes a net increase of 277,901 square feet in comparison to the square footage on the site on April 8, 2008. Additionally, in Chapter 4, Analysis of Alternatives, the Draft EIR analyzed a reduced project (Alternative 7: Reduced-Density), which assumed approximately 50 percent (152,029 square feet) less net new development. Alternative 7 would have lower impacts than the proposed project; however, it would eliminate impacts and it would not fully meet the project objectives.

Please also see Draft EIR page 2-48 and Figure 2-9 for discussion of refinements to the proposed project since the release of the Notice of Preparation. Refer to Master Response #9: Views and Scale of Development regarding the scale of development.

Comment PC297-7

Seaside Lagoon

As Redondo Beach residents are paying for this upgrade (not CenterCal who has been allowed to take credit for it), the safety issue is not addressed sufficiently, if at all. Why was this left out? Reducing the size of Seaside Lagoon to one-third of its original size is not justified by what is claimed to be the benefits. Opening Seaside Lagoon to the ocean brings in water that is substandard in sanitation. What mother/grandmother would prefer that contamination over a chlorinated water supply? Safety issue 2: lack of enclosure leaves the area open to the boaters, all competing for space and gives the sea otters free range to enter the area. No sufficient reason given to reduce the Seaside Lagoon area which serves a minority of our population.

Conclusion: alternative to no project -- necessary infrastructure improvements only.

Response to Comment PC297-7

Regarding comments on Seaside Lagoon, please refer to Master Response #4: Modifications to the Seaside Lagoon. As for the comment about 'sea otters,' it should be noted that sea otters occur mostly north of Point Conception, which is approximately 170 miles north of the proposed project, and not within King Harbor. For information on 'sea lions,' please refer Section 3.3, Biological Resources of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. The commenter's opinions are noted regarding project alternatives.

Comment PC297-8

3.9 Land Use and Planning Alternative 2 No Project -- Necessary Infrastructure Improvements

The maintenance of the OVERDEVELOPMENT is not addressed in the EIR draft which harkens back to a lack of responsibility for the infrastructure that caused the City to seek a developer to remedy this neglect. In each case, the City, as lead agency, has the liability for any failures in the project and these are passed on to the tax-paying residents -- a lose-lose outcome. The residents lose their access to beach and recreation and are "stuck with the bill" for failed development. It is sometimes referred to as entropy.

The EIR submitted to the public does not adequately represent the impacts to the Harbor area. The proposed design (i.e. boat ramp, reduced parking adjacent to it, and Seaside Lagoon) are so non- functional as to question the designer's capability to plan such a project. He has never developed a Waterfront project before this one.

The current project represents a significant degradation in the ability of the public to enjoy and utilize these coastal-dependent, recreational, commercial opportunities, and assets. The impact is driven by the amount of development of commercial retail, entertainment, and restaurant uses, none of which are coastal-dependent. The project should not sacrifice coastal-dependent recreational and commercial uses for non-coastal dependent commercial uses.

Response to Comment PC297-8

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. Maintenance of the project site is assumed in the operations analysis in each resource analyzed in the Draft EIR (Sections 3.1 through 3.14). As described in Chapter 2, Project Description, Section 3.9, Land Use and Planning, and 3.12, Recreation of the Draft EIR, the proposed project includes a mix of coastal-dependent and coastal-related commercial and recreational uses.

Comment PC297-9

3.13 Traffic and Transportation Alternative 2 No Project -- Necessary Infrastructure Improvements

The City has inadvertently demonstrated a conflict of interest regarding providing low-cost senior housing and then stating that there is "no significant environmental impact" to neighboring residences.

The Torrance Boulevard of the CenterCal project which is slated to have a 2+ story parking structure will greatly obscure the view of the Casa De Los Amigos residence who have been on waiting lists for such an aesthetic, uplifting view of the ocean. They will also have to deal with a "high-end boutique hotel" just below their building. They will have construction noise for more than two years. This is all the more true

for the Salvation Army residents on the corner of Beryl and Catalina. These residents will have a three-story parking structure to block their view and the brunt of the tourist trade traffic.

Response to Comment PC297-9

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. Views are addressed in Section 3.1, Aesthetics and Visual Resources in the Draft EIR and Master Response #9: Views and Scale of Development. Construction noise is addressed in Section 3.10, Noise in the Draft EIR. The commenter also suggests that the parking structure would obscure views from private developments. Please see Draft EIR Section 3.1.2.3.4 and 3.1.4.1.1 for discussion of the selection criteria for local valued views analyzed under Impact AES-1. Please see Draft EIR Section 3.10, Impacts NOI-1 and NOI-4 for discussion of construction noise impacts and mitigation.

Comment PC297-10

1. No street added below Harbor Drive -- no additional drive-thru traffic.

Conclusion: alternative to no project -- necessary infrastructure improvements only.

Response to Comment PC297-10

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. Traffic is addressed in Section 3.13, Traffic and Transportation in the Draft EIR and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC297-11

Applicable Coastal Act sections that may be violated by the CenterCal/Redondo Beach City proposal: 30211 Development shall not interfere with access

30212	Public access in new development projects
30212.5	Public facilities distribution
30220	Protection of certain water-oriented activities
30223	Upland areas support of Coastal recreational uses
30224	Recreational boating use, encouragement facilities
30234.5	Economic, commercial, and recreational importance of fishing
30250	Location, existing developed area
30251	Scenic and visual qualities
30253	Maintenance and enhancement of public access
30255	Priority of coastal-dependent developments

Response to Comment PC297-11

As described in Section 3.9, Land Use and Planning of the Draft EIR, implementation of Coastal Act policies is accomplished through the City's certified Local Coastal Plan (LCP), which was reviewed and approved by the California Coastal Commission and the voters of Redondo Beach (Measure G). The Coastal Act requires all cities and counties along the California coast to prepare an LCP for the portion of their jurisdiction that falls within the coastal zone. The LCP must reflect the coastal issues and concerns of its specific area, and be consistent with the overall statewide goals, objectives, and policies of the Coastal Act. As discussed in Section 3.9, the proposed project is consistent with the City's certified LCP, and therefore, it is consistent with the California Coastal Act. Please also see Draft EIR Sections 2.4.1.4

and 2.4.1.5 for discussion of the numerous vehicular, pedestrian, and bicycle oriented transportation/access improvements associated with the proposed project. Please also note that the purpose of the EIR is to disclose the physical environmental impacts associated with the proposed project in comparison to existing conditions, not to provide a statutory consistency analysis. (CEQA Guidelines Section 15126.2(a).) In addition, please refer to Response to Comment PC323-63.

Comment PC297-12

California Environment Quality Act (CEQA)

The following sections may be violated by the project:

15124 Project Description

15125 Environmental Setting

The vagueness of the project and the Developer, Fred Bruning, when interviewed in the last month continues to be vague, raising further concerns that the developer has been given "a blank check" for him to fill in the amount of the project and the collateral damage to the environment.

Response to Comment PC297-12

The Draft EIR was prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (State CEQA Guidelines) (14 California Code of Regulations [CCR] Section 15000 et seq.). As noted in Chapter 3.0 of the Draft EIR, each individual resource chapter provides discussion of an environmental setting/baseline in compliance with CEQA Guidelines Section 15125. Draft EIR Chapter 2 contains a project description in compliance with CEQA Guidelines Section 15124. (See also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final design does not need to be completed at the time of project approval/EIR certification.].)

Response to Comment PC297-13

Applicable City of Redondo Beach Code

Coastal Land use Plan

Section VI, Subsection D, Policy 1

Section VI, Subsection D, Policy 2

Section VI, Subsection D, Policy 6

Section VI, Subsection D, Policy 15

Section VI, Subsection D, Policy 17

Section VI, Subsection D, Policy 18

Section VI, Subsection D, Policy 20

Title 10, Chapter 5 Coastal Land Use Plan Implementing Ordinance,

Article 1 General Provisions, 10-5, 102

Article Z Zoning Districts Division 3

10-5.800

10-5.811

10-5.812
10-5.813
10-5.814
Article 5 Parking regulations
10-2.1706

Response to Comment PC297-13

See Section 3.9, Land Use and Planning of the Draft EIR that addresses the proposed project's consistency with the Coastal Land Use Plan and Coastal Land Use Plan Implementing Ordinance (Coastal Zoning). Draft EIR Table 3.9-5 discusses the project's consistency with Coastal Land Use Plan Policies 1, 2, 6, 15, 17, 18, and 20. For discussion of consistency with the City's Coastal Zoning, please see Draft EIR page 3.9-55. The commenter does provide any details regarding the alleged municipal code/policy inconsistencies or specific project components; therefore, no additional response is possible. Please also see Response to Comments PC297-1 through 12 for additional details regarding specific allegations. For discussion of parking, please see Draft EIR Section 3.13, and Master Response #7: Waterfront Parking.

Comment PC297-14

ENVIRONMENTAL IMPACT REPORT COMMENTS AND CONCERNS

3.9 Land Use and Planning (2.6 MB)

The overarching concern for the City of Redondo Beach and CenterCal as co-applicants to this proposal is the piecemeal development that is under the city's auspices. There appears to be no cohesive plan that covers the Lagado, the Knob Hill school site, and the waterfront mall development -- the latter two under the protection of the Coastal Commission. Please do not even consider removing these from the State and Coastal Commission's jurisdiction. Alternative to -- no project -- necessary infrastructure improvements. The foregoing alternative is necessary until there is the additional mitigation of an inclusive master building plan that is visionary in providing for the majority of the taxpayers who assume the burden as well as providing "for our common home", our natural resources at the Waterfront.

Redondo Beach is notably "park poor" and that comparison to other cities already includes the beach to defend itself against not providing enough walking park space. To commercialize the waterfront with three high-end "boutiques" and parking structures to service this commercial enterprise is indefensible.

Mole D, the Tidelands owned by the State and granted to the City of Redondo Beach is the most vulnerable. Basin 3, the uplands, in exchange for Mole D, so that CenterCal can build the market square portion of the development in the tidelands location is unacceptable; publicly-owned land should not be used for commercial development purposes. Once the Tidelands are no longer under the grant conditions of the State of California, they are open to be reduced/removed/ruined by CenterCal. The exchange of lands will violate conditions of the grant Chapter 57 and Sections 6307. By taking Tidelands and the Breakwaters that protects those Tidelands away where people can fish, walk, and enjoy nature.

By destroying the habitat of sea creatures, this contradicts and nullifies the 2005 Beach Bluff Restoration Project Master Plan. This plan was prepared with funding from California Proposition 12, administered by the California Coastal Conservancy and the Santa Monica Restoration Committee by a grant to the L.A. Conservation Corps in the Urban Wild Lands Group. This plan was prepared with the Project's Steering Committee in Redondo Beach, California; significant additional funding was provided by a grant from the

City of Redondo Beach. You may download a copy of this plan from:
http://www.urbanwildlands.org/bbrp.html

Other factors not considered adequately in the EIR:

- Sierra Club letter from Sacramento, January 16, 2016: "Exercising the courage to say no" states that one of the key issues in climate change is dangerously rising sea levels
- A high-surf advisory warning has been in effect for the past 10 to 12 days
- The flooding at the Pier in the past warns us of the possibility of occurring again.
- The need for NOAA (National Oceanic and Atmospheric Administration) to review the conditions of the development proposal; see attached pages 1-7.

Conclusion: Alternative 4 --no property exchange with the State.

The State only allows a 65-year lease; CenterCal wants a 99-year lease on this property. It leaves this land exchange vulnerable to whomever CenterCal sells the property (or the Bank/Lender should CenterCal declare bankruptcy, which they are liable to do at their 10% profit requirement). An unknown buyer, not required to be a citizen of the United States, would have an undetermined timeline of control over the land which is integral to the structural integrity of the Waterfront. The Tidelands and Uplands both deserve the protection of the State of California so as to prevent a land exchange detrimental to it. Why were strict protections for these lands not addressed in the EIR draft? The taxpayers, property-owning residence, own Basin 3, but their collective wishes, as represented in eight public meetings over a two-year period where they asked for a smaller project than CenterCal demanded., have been ignored. Why was CenterCal's design allowed to move forward without modification? Rather, their design has expanded. Why was a three-dimensional model not provided by CenterCal after formal City Council and citizen request over a two and a half year period?

Mitigation: many residents would support a Bond measure to defray the cost of the parking/infrastructure repairs rather than have two above-ground, two- and three-story parking structures which will 80% of the view and obfuscate the possible ambience of a smaller scale pier/harbor redevelopment that could be agree on.

Seaside Lagoon

As Redondo Beach residents are paying for this upgrade (not CenterCal who has been allowed to take credit for it), the safety issue is not addressed sufficiently, if at all. Why was this left out? Reducing the size of Seaside Lagoon to one-third of its original size is not justified by what is claimed to be the benefits. Opening Seaside Lagoon to the ocean brings in water that is substandard in sanitation. What mother/grandmother would prefer that contamination over a chlorinated water supply? Safety issue 2: lack of enclosure leaves the area open to the boaters, all competing for space and gives the sea otters free range to enter the area. No sufficient reason given to reduce the Seaside Lagoon area which serves a minority of our population.

Conclusion: alternative to no project -- necessary infrastructure improvements only.

3.9 Land Use and Planning Alternative 2 No Project -- Necessary Infrastructure Improvements

The maintenance of the OVERDEVELOPMENT is not addressed in the EIR draft which harkens back to a lack of responsibility for the infrastructure that caused the City to seek a developer to remedy this neglect. In each case, the City, as lead agency, has the liability for any failures in the project and these are passed on to the tax-paying residents -- a lose-lose outcome. The residents lose their access to beach and recreation and are "stuck with the bill" for failed development. It is sometimes referred to as entropy.

The EIR submitted to the public does not adequately represent the impacts to the Harbor area. The proposed design (i.e. boat ramp, reduced parking adjacent to it, and Seaside Lagoon) are so non-functional as to question the designer's capability to plan such a project. He has never developed a Waterfront project before this one.

The current project represents a significant degradation in the ability of the public to enjoy and utilize these coastal-dependent, recreational, commercial opportunities, and assets. The impact is driven by the amount of development of commercial retail, entertainment, and restaurant uses, none of which are coastal-dependent. The project should not sacrifice coastal-dependent recreational and commercial uses for non-coastal dependent commercial uses.

3.13 Traffic and Transportation Alternative 2 No Project -- Necessary Infrastructure Improvements

The City has inadvertently demonstrated a conflict of interest regarding providing low-cost senior housing and then stating that there is "no significant environmental impact" to neighboring residences. The Torrance Boulevard of the CenterCal project which is slated to have a 2+ story parking structure will greatly obscure the view of the Casa De Los Amigos residence who have been on waiting lists for such an aesthetic, uplifting view of the ocean. They will also have to deal with a "high-end boutique hotel" just below their building. They will have construction noise for more than two years. This is all the more true for the Salvation Army residents on the corner of Beryl and Catalina. These residents will have a three-story parking structure to block their view and the brunt of the tourist trade traffic.

- No street added below Harbor Drive -- no additional drive-thru traffic.

Conclusion: alternative to no project -- necessary infrastructure improvements only.

Applicable Coastal Act sections that may be violated by the CenterCal/Redondo Beach City proposal:

30211	Development shall not interfere with access
30212	Public access in new development projects
30212.5	Public facilities distribution
30220	Protection of certain water-oriented activities
30223	Upland areas support of Coastal recreational uses
30224	Recreational boating use, encouragement facilities
30234.5	Economic, commercial, and recreational importance of fishing
30250	Location, existing developed area
30251	Scenic and visual qualities
30253	Maintenance and enhancement of public access
30255	Priority of coastal-dependent developments

California Environment Quality Act (CEQA)
The following sections may be violated by the project:

15124	Project Description
15125	Environmental Setting

The vagueness of the project and the Developer, Fred Bruning, when interviewed in the last month continues to be vague, raising further concerns that the developer has been given "a blank check" for him to fill in the amount of the project and the collateral damage to the environment.

Applicable City of Redondo Beach Code
Coastal Land use Plan
Section VI, Subsection D, Policy 1
Section VI, Subsection D, Policy 2

Section VI, Subsection D, Policy 6
Section VI, Subsection D, Policy 15
Section VI, Subsection D, Policy 17
Section VI, Subsection D, Policy 18
Section VI, Subsection D, Policy 20
Title 10, Chapter 5 Coastal Land Use Plan Implementing Ordinance,
Article 1 General Provisions, 10-5, 102
Article Z Zoning Districts Division 3
10-5.800
10-5.811
10-5.812
10-5.813
10-5.814
Article 5 Parking regulations
10-2.1706

Response to Comment PC297-14

Comment PC297-14 is the same as Comments PC297-1 through PC297-13. Please see Responses to Comment PC297-1 through PC297-13 above.

COMMENT LETTER NO. PC298 GREG HOFFMAN

Comment PC298-1

I am 22 years old, an avid fisherman, and a 3rd generation resident of the neighboring community of Manhattan Beach. I am writing to petition on behalf of my family and myself to keep Redondo Sportfishing alive. I grew up fishing the "City of Redondo" and the "Redondo Special" 1/2 day boats with my father and my little brother where we built memories together that will never be forgotten with the friendly crews of Redondo Sportfishing. I worked on "The Tradition" out of Redondo Sportfishing while I was in high school and I consider the experiences I had to be critical in my development as a responsible young man. I still fish with Redondo Sportfishing frequently as I find that it is one of the last family-friendly recreational experiences in the South Bay, a community that has been slowly but surely watered down and disbanded by upscale development that lack any sense of community or tradition. Please keep Redondo Sportfishing in the Marina. It is a business that epitomizes the South Bay's outdoor-loving lifestyle and it deserves to remain in operation.

Response to Comment PC298-1

Please refer to the Master Response #5: Sportfishing Pier, Polly’s and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC299 JAYSEN SURBER

Comment PC299-1

My name is Jaysen Surber and lived in Redondo 45 years, my family for 73...I am against this plan and center cal being involved. I am against this huge plan to spend now and wait and see what happens...it did not work when that was the sentiment for the upper pier revitalization... and we are still losing

money on that decision...put the emphasis on the water... expand the breakwall to start...let's actually make it King Harbor....

Response to Comment PC299-1

Your opinion on the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC300 KEVIN UHLIN

Comment PC300-1

As a long time so cal resident, I urge you to keep Redondo Sport Fishing in the RB Pier.
Lots of memories and history there for all of us.

Response to Comment PC300-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC301 CARLOS FERNANDEZ

Comment PC301-1

Please keep sport fishing in King Harbor. I have been fishing out of Redondo Beach Sportfishing for many many years. It brings people from all over the place to experience the beauty of our South Bay that would otherwise not come. Thanks

Response to Comment PC301-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC302 CRAIG HARATANI

Comment PC302-1

Getting rid of Redondo Beach Sportfishing is getting rid of Redondo Beach history

Response to Comment PC302-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC303 MARC R.

Comment PC303-1

I am writing to submit a comment on the Waterfront Draft Environmental Impact Report.

I have lived in the South Bay my entire life, and I have been fishing on boats operating from Redondo Sportfishing (and hence supporting a Redondo Beach business!) since I was attending grade school. I hope to continue with this tradition, and I hope that when I have children that I will be able to take them with me on trips here.

Redondo Sportfishing is incredibly convenient for South Bay residents and has been a part of the South Bay for decades. It offers fishermen from all walks of life with equal access to the ocean around the Palos Verdes Peninsula, the greater South Bay, and Catalina Island. Redondo Sportfishing offers a unique value proposition in terms of convenience, affordability, and professionalism of the captains and crew. There are no other sportfishing landings that are an apples to apples comparison.

Hence, I highly encourage the City of Redondo Beach to allow Redondo Sportfishing to continue its business.

Additionally, I strongly oppose any actions catalyzed by the results of the Waterfront Draft Environmental Impact Report that would cause Redondo Sportfishing to permanently close, temporarily cease operations, or undergo restrictions in their ability to service South Bay fishermen.

Response to Comment PC303-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC304 LINDA R. NEAL

Comment PC304-1

I have lived in the South Bay all of my life, first in Redondo as a small child and recently for the past twenty years. I am appalled at the concept the city seems willing to adopt for renovating the pier. This is a harbor, a beach community, a small town, and the proposed development speaks to none of that.
To top it off, we have the AES property to consider as part of the waterfront, and we need an overall municipal plan that will encompass both sites if we are to survive as a "quaint" beach community. Big is rarely better, and we've seen what can happen (the waterfront condos that exist where we once had a downtown) when development goes haywire.

I urge the city to rethink this renovation. I have seen Centercal's video, and I've gone to their "open" planning meetings, and I think the whole thing is outrageous and not in our best interest as a community.

Response to Comment PC304-1

The proposed project would not modify AES' property. As for the future AES project, refer to Master Response #1: AES Power Plant Site. The comment does not address an environmental issue. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC305 CHRISTOPHER IMBRO

Comment PC305-1

Don't take our fishing boats away.
They are major part of the whole King Harbor experience. Without them you are basically saying, " Go and spend your time and money in San Pedro,". Redondo Beach and the Palos Verdes peninsula are world class fisheries and our local businesses deserve the support of the City of Redondo Beach.

Response to Comment PC305-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC306 MAURICIO

Comment PC306-1

Keep fishing in Redondo. I am actually against any changes to our marina area. Keep it quiet, not congested like it has been for last many decades

Response to Comment PC306-1

The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC307 CARLOS MEDINA

Comment PC307-1

Keep the sport fishing in Redondo! Fish kept me out of trouble and gang activities! Fishing has changed my life and Redondo is the closest fishing pier around and available for everyone. Sport fishing should continue to be part of Redondo for every one and every angler.

Response to Comment PC307-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC308 JOHN C. WILEMAN

Comment PC308-1

Hello! I am in South Redondo, 90277, and I truly hope that the Waterfront will keep a sportfishing boat landing in its plans.

Response to Comment PC308-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC309 BRAD RITTER

Comment PC309-1

As a 10-year city resident, I appreciate the opportunity to comment on the proposed harbor project. While the city is to be applauded for its efforts to improve this remarkable asset, the current proposed concept is seriously flawed and needs to be completely revisited. Among my concerns:

- Malls — and make no mistake, this is a suburban mall concept — generate massive amounts of traffic and pollution that would negatively impact the quality of life in much of Redondo Beach and reduce residents' pier, harbor and beach access.

Response to Comment PC309-1

The impacts associated with construction and operation of the proposed project are detailed in Section 3.1 to Section 3.14 of the Draft EIR. For a summary of the project description and the environmental impacts of the proposed project and alternatives, the Executive Summary document is also included in the Draft EIR. Refer to Response to Comment PC077-1 for additional information on impacts associated with the proposed project.

Comment PC309-2

- The focus on retail — at a time when the traditional retail industry is contracting — is ill advised and puts the city at great fiscal peril. Imagine the waterfront scarred by a huge project sitting incomplete, with the city desperately trying to find funding to restart or operate it.

Response to Comment PC309-2

It should also be noted that the land use mix assumed for the proposed project is more restaurant than retail (35 percent restaurant vs 20 percent retail). As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Your comment and opinions are acknowledged and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC309-3

- As objections from thousands of residents and current pier and harbor businesses grow — and doubts surface about the developer's vague plans ability to generate funding — the likelihood that the project will be derailed for any number of reasons are very real.

Response to Comment PC309-3

Your opinion is noted. As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

Comment PC309-4

More reasonable, responsible and appropriately-scaled alternatives to improving the harbor and pier do exist. Re-examining them would serve the city and its residents very well.

Response to Comment PC309-4

Your opinion is noted. Chapter 4, Analysis of Alternatives of the Draft EIR analyzed seven (7) alternatives associated with the project site and an alternative related to alternative boat ramp locations with development at the project site.

The comments are acknowledged and these comments will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC310 JOANNE GALIN

Comment PC310-1

I just wanted to give a few words of support regarding the waterfront.

This is so important to our future. We are so lucky that Centercal wants to put so much into our city.

Please please let's just move this project along and revitalize our waterfront.

Redondo Beach needs this!!!

Response to Comment PC310-1

The commenter states an opinion/preference relevant to the project approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC311 LARRY WOLF

Comment PC311-1

Please keep Redondo Sportfishing alive it's good for all types of people and ages. No racism or religion affected anyone can go fishing.

Response to Comment PC311-1

The commenter states an opinion/preference relevant to the project approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC312 ADRIENE BIONDO

Comment PC312-1

Please see the attached letter responsing to the Waterfront Draft EIR.

Thank you for the opportunity to review and comment.

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Draft EIR for The Waterfront Project which directly impacts an important postwar harbor landscape as well as significant postwar landmarks, namely Tony's Hats N' Things, Old Tony's and Top o' Tony's.

Section 3.4 Cultural Resources outlines a plan that would demolish King Harbor, one of the last post-World War II harbor developments in Southern California. Planning consultants Victor Gruen Associates initially presented proposals but the final harbor master plan was designed by noted mid-century architects Arthur Froehlich (Hollywood Park, Belmont Park, Hanna-Barbera Studios) and Rex Lotery (Trousdale Estates) and approved by the U.S. Army Corps of Engineers in August 1959 with 1,300 boat slips, two breakwater sheltered marina basins, a boat lagoon, a sub-street level pedestrian walkway with shop spaces (the International Boardwalk), as well as the later addition of a warm water fed, sand-bottomed lagoon and themed Seaport Village.

This tremendous undertaking proposed removal of the Santa Fe Railroad station site and the Redondo Ballroom, built by Huntington's Pacific Electric Land Company, among other streets and portions of Old Redondo Beach, including The Fox Theater, demolished in 1973 "to make way for a six-story hotel that was never built."

Over the years King Harbor has suffered its share of impacts, including the storms of 1988 whose 20-foot waves and 52mph winds resulted in $17 million in damage to the Horseshoe and Monstad Piers, nearly destroyed the harbor breakwater retaining wall, washed to sea the famous Blue Moon Saloon Restaurant and the fishing promenade. Then in May 1988, shorted electrical wiring under a Horseshoe Pier restaurant started a fire that destroyed 15 pier businesses and half of the remaining deck. Reconstruction of the pier using concrete pilings was completed in 1995.

Through all of this, the true survivor that has weathered all the storms is the beloved, family-owned Tony's On The Pier -- which includes Tony's Hats N' Things, Old Tony's restaurant and Top o' Tony's. It was started back in 1952 by Anthony A. Trutanich ("Tony T") who according to Old Tony's website http://oldtonys.com/about.php was a lead navigator on 25 missions during World War II, including D-Day. Tony built the single story wooden building houses Old Tony's restaurant, and in 1965 added an octagonal second story with canted window-walls which serves as a cocktail lounge and offers 360 degree views all the way to Palos Verdes. Steep gables shelter the main entrance and stairway to the lounge landing. As described in the DEIR, "These exaggeratedly steep and eccentric gables have a Polynesian 'tiki' aspect, with protruding shaped ridge beams and verge boards, extended eaves and rafters, and oversized random patterned shingles. The scrolled pierced-work stair railing balusters and patterned tile steps also have a tiki sensibility. These features are in marked contrast to the seaport character of the main entrance, with its heavy timber piling and chain motif and spindle balustrade frieze, and to the smoked glass story-and-a-half window wall of the restaurant foyer. The north end of the building has fishing village influences, decorated with blind multi-paned windows and iron accent lantern. The northeast wall of the first level is an aluminum framed glazed wall overlooking the harbor."

"The octagonal upperstory displays a skirt of wood weatherboards below outwardly canted aluminum framed window walls that offer a 360 degree view of the harbor. This feature is crowned by a shake covered roof with "crow's nest" and protruding shaped roof beams. Rising from the roof is the landmark "Tony's" sign with three large colored orbs. The interior of the restaurant features abundant dark toned woodwork, open ceilings with exposed framing, and period lighting fixtures including colored glass sphere net floats, fishing nets, and other features in keeping with the tiki meets sailing vessel theme."

This is a description of buildings and signage that are so uniquely one-of-a-kind that they have come to symbolize the independent spirit of Southern California's beach and surfing scene of the 1950s and 1960s. Old Tony's logo of the building and sign is iconic Redondo Beach. Whether "officially designated" or not, Tony's IS a truly important landmark that needs to be preserved, not replaced. We cannot continue losing beloved destinations like Tony's; they are important touchstones within a community which lend character and a sense of place, and create a synergy with new buildings.

Tony's is an historic, cultural and architectural gem that should not be demolished and rebuilt, but restored and incorporated into any new project that is built. The Grove and Farmers Market at 3rd and Fairfax in Los Angeles is an excellent example of a true "win/win" where a highly successful development incorporated historic buildings which continue to resonate with people today and tell the stories of the communities they served.

As Chair Emeritus of the Los Angeles Conservancy's Modern Committee, I initiated the successful landmarking of the Capitol Records building in Hollywood and worked with the City of Los Angeles to create a Historic Preservation Overlay Zone for over one hundred homes built in 1963-64. I have also co-authored a number of books, Southern California Eats (which features Old Tony's), Modern Tract Homes of Los Angeles and Southern California Out & About.

I urge you to join other progressive cities by preserving Redondo Beach's own history and extraordinary beach city architecture. If we don't have the foresight to preserve our historic landmarks today, there will be no landmarks for anyone to enjoy.

Response to Comment PC312-1

As detailed in Section 3.4, Cultural Resources, starting on page 3.4-56, and project-specific historical resources investigation (Appendix E2), both in the Draft EIR, Tony's On The Pier and its companion structure (Tony's Hats 'N Things) appears eligible for designation as a Redondo Beach landmark under Criteria B and C of the City's local landmark criteria (although there is no official designation) for its association with its developer, Tony Trutanich (who built upon his success with his original restaurant to become the master leaseholder for the entire Monstad Pier) and as an excellent and intact example of 1960s era fantasy themed commercial architecture, respectively. As discussed on page 3.4-65 of the Draft EIR, avoidance, relocation, and partial retention of these resources is not possible due to the existing condition of these structures. As also detailed in Section 3.5, Geology and Soils of the Draft EIR, on page 3.5-20, inspections of the timber portion of the Horseshoe Pier where Tony's stands is from 1928, and although it has had maintenance over the years, this portion of the pier is aged and does not meet the current code requirements. The continued obligation and ability to repair and maintain the aged structure is severely constrained by the existing buildings, limited access, and the pier's constant exposure to storm waves and surf. Because of these constraints, current repair methods would be less effective unless the existing buildings are removed to better access the work area so that the structural members can be properly replaced. This essentially translates to nearly total demolition and replacement of the timber portion of the pier and buildings, which would result in removal or alteration to these potentially historical resources; therefore, even with implementation of mitigation measures (i.e., MM CUL-1 Recordation and MM CUL-2 Interpretive Program) a significant unavoidable impact would occur. As further discussed under Alternative 1 in Section 4.4.1 of the Draft EIR, given the poor condition of the timber portion of the Horseshoe Pier is in very poor condition and that portion of the pier, as well as the buildings, which includes Tony's and its companion structure, would be closed to the public in the future if the necessary structural repairs cannot be made.

The commenter states an opinion relevant to the project; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC313 BIBI GOLDSTEIN

Comment PC313-1

I was given your email to submit a comment on the waterfront project, not sure how this goes so just going to type out my thoughts….

When I was a pre-teen my older sister lived on the Esplanade and I would come stay with her during school breaks and summer. I never imagined that 25 years later I would move to Redondo Beach myself. While I have fond memories of the pier, I also very clearly remember that it wasn't where everybody went to hang out even back then Hermosa and Manhattan were where people went. I have lived in North Redondo for the last 13 years and usually when my husband and I walk or bike somewhere it's to go to Hermosa. I'm in favor of the waterfront project because I want a place in Redondo Beach that I can further embrace my sense of community by being out in it and meeting my neighbors and welcoming anyone who wants to come support businesses in Redondo regardless of where they live. I'm so excited by what I've seen so far, the balance of attracting our own residents to a place the entire family can enjoy to creating an environment that everyone else wants to come and experience.

Response to Comment PC313-1

The commenter states an opinion/preference relevant to the project approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC314 — LAURA C. SCARBROUGH - NAHOA OUTRIGGER CANOE CLUB

Comment PC314-1

I attended the public workshop on Saturday, January 9, 2016 to try to understand the proposed plans for the waterfront.

My name is Laura Scarbrough, I am an Authorized Representative of the Nahoa Outrigger Canoe club which occupies space on Mole B along with the Lanakila Outrigger Canoe club. I would just like to comment in reference to Chapter 4 Analysis of Alternatives, 4.4.8.3 Alternative 8 Environmental Analysis regarding the public small boat ramp. On page 4-341, all Options for Mole A are simply not viable options. The narrow 2-lane driveway leading to the where the KHYC is currently located is too narrow and cannot be widened. The traffic light at the entrance is very narrow and tight and already has to serve as an entrance to the apartment complex, the restaurant, and the yacht club.

Nahoa Outrigger Canoe club is supportive of using one of the options on Mole C for the public small boat ramp.

Response to Comment PC314-1

Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC315 — ANNEKE BLAIR

Comment PC315-1

Please accept my comments below for public record.

I do not agree with the draft environmental report for this project and do not support the project at this time. For the following reasons:

The DEIR states that there are no impacts to views. The views along Harbor Drive will be significantly impacted from the bike and car lanes. More than 80% of the current view from the street will be obstructed by

buildings. I don't know what can be done to mitigate the view impacts. This will significantly diminish the quality of life of those who enjoy a long leisurely bike ride.

Response Comment PC315-1

As detailed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, the analysis determined that the proposed project's aesthetic and visual impacts would be less than significant (not "no impacts" as the commenter has incorrectly stated). Please also refer to the Master Response #9: Views and Scale of Development for a brief summary of the impact methodology and results. Please also see Response to Comment PC333-16 for discussion of bike paths.

Comment PC315-2

The DEIR states there will be no impact to traffic despite an impact in traffic. This is impossible as all of the arteries that feed the area are already overstressed and a traffic nightmare. Adding an estimated 700 more trips daily will negatively impact the lives of anyone that lives or works in this area and especially commuters. The mitigation proposed in the DEIR is not enough to alleviate the already horrible congestion we face. It also does not account for traffic that could be added with the proposed.

Response to Comment PC315-2

The commenter is incorrect that the Draft EIR found 'no impact' related to traffic. As detailed in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR, impact related to traffic were found to be significant without mitigation at several intersections. However, these impacts would be reduced to less than significant with implementation of mitigation. The traffic study in the Draft EIR (Appendix L1 and summarized in Section 3.13) discusses how the mitigation would address the impact. Regarding general concerns regarding traffic associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC315-3

The DEIR states that there would be no significant impact to recreation. The opening of the Seaside lagoon significantly impacts the recreation of our community and puts young children at risk. It also will impact those that use the marina to launch their stand up paddle boards and other small craft. SUP'ers will have to carry their boards through a retail, dining, and entertainment area to be able to launch. It will also open the "lagoon" up to the seals. This will mean that in order to launch you will have to make sure they have been cleared.

Response to Comment PC315-3

Safety associated with the opening of the Seaside Lagoon and the new boat ramp was found to less than significant with mitigation, which is detailed in Section 3.13, Traffic and Transportation of the Draft EIR. For a summary of the proposed changes Seaside Lagoon, please refer to Master Response #4: Modifications to the Seaside Lagoon. Please also see Response to Comment PC323-73 for discussion of the significance criteria related to recreation.

Comment PC315-4

The DEIR calls out that competition is a risk but it did not take into full consideration all the other development projects that are happening at the same time specifically the South Bay Galleria. It also uses several other projects for a comparison but all of those projects have more of an attraction than an overpriced movie theater

and the ocean. Each of the comparisons have over 30% entertainment where ours is significantly lower at just 13%.

Response to Comment PC315-4

The commenter first states that "the DEIR calls that competition is a risk but it did not take into full consideration all the other development projects that are happening at the same time specifically the South Bay Galleria." The commenter does not reference where the Draft EIR "calls that competition is a risk," and it is uncertain as to what portion of the document the commenter is referring to. However, to the extent the commenter is referencing the cumulative analysis (based on the commenters note regarding consideration of other development projects, please see Master Response #2: Cumulative Analysis. If the commenter is referencing the AECOM study, which is Appendix O of the Draft EIR, per Figure 19 (page 23), although the study indicated that the 'entertainment' associated with the Waterfront was estimated at 13 percent, contrary to what the commenter states, only three of the other seven RDE/Lifestyle Shopping Centers listed in the table have over 30 percent entertainment; not each of the comparisons. For additional information on the economic viability associated with the site, refer to Chapter 5, Other Environmental Considerations and Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

Comment PC315-5

The size of this project is way too big when you consider that it is proposed at 305,000 sq ft just 11,000 sq feet smaller than Universal Citywalk and 75,000 sq feet larger than Downtown Disney.

Response to Comment PC315-5

Your opinion is noted. The commenter states an opinion and does not introduce new environmental information. Your opinion on the proposed project is important and your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body

COMMENT LETTER NO. PC316 DENISE DEAN

Comment PC316-1

I taught my son to fish on Polly's Pier. We have made many memories and friendships during our hours spent on the pier. I would be heartbroken to see it disappear.

Response to Comment PC316-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC317 JOHN MANN

Comment PC317-1

Please add the attached comments to the Draft EIR for the Waterfront, Redondo Beach.

1. Missed Impacts Due to Narrow Definition of "Project Vicinity"

The Draft EIR defines "project vicinity" throughout the document as follows:

> . . . the project vicinity (*i.e.*, Torrance Circle/Boulevard between Catalina Avenue and the project site) . . .
>
> (ES 7.2.4, NOISE NOI-3 and elsewhere in the Draft EIR.)

That definition omits the residential neighborhood where many of the impacts will be most severely felt, *i.e.*, the Seascape and Village residential units immediately east of the project site, north of Torrance Circle/Boulevard. The EIR should explicitly address the impacts on that neighborhood.

Response to Comment PC317-1

Section 3.10, Noise of the Draft EIR address potential noise impacts associated with construction and operation of the proposed project on the sensitive receptors nearest to the project site, which includes the Seascape and Village residential neighborhood. Throughout the Draft EIR, the adjacent residential area (as it is immediately to the east of the project site) is considered in the analysis. The analysis presented in Section 3.10, Noise of the Draft EIR determined that noise impacts associated with operation of the proposed project would be less than significant (including along the Pacific Avenue Reconnection), with the exception of the increase in existing ambient noise levels associated with vehicle traffic along Torrance Circle/Boulevard between the project site and Catalina Avenue. Please see Response to Comment PC264-1 regarding roadway noise along Pacific Avenue.

Comment PC317-2

2. Impact: Ambient Noise

The Draft EIR states that the project would cause "a substantial permanent increase in ambient noise levels in the project vicinity," and that the impact would be "significant and unavoidable." (ES 7.2.4, NOISE NOI-3.)

This is one of the impacts that will be most severely felt in the Seascape and Village residential neighborhood. A major contributor to this impact will be the proposed new road – especially if it is used not just for access to the project but by commuters as an alternate route to Pacific Coast Highway and Catalina Avenue.

Response to Comment PC317-2

As detailed in Section 3.10, Noise of the Draft EIR and noted in Response to Comment PC317-1 above, noise impacts associated with operation of the proposed project would be less than significant (including along the Pacific Avenue Reconnection), with the exception of the increase in existing ambient noise levels associated with vehicle traffic along Torrance Circle/Boulevard between the project site and Catalina Avenue; therefore, only the residences nearest the Torrance Circle/Boulevard between the project site and Catalina Avenue would be impacted. Please see Response to Comment PC264-1 regarding roadway noise along Pacific Avenue.

Comment PC317-3

3. Mitigation: Ambient Noise – and Safety

Three mitigation measures are recommended. The first two would reduce ambient noise – and enhance safety – for the new hotel, the Seascape and Village neighborhood, and the project as a whole. The first and third would dissuade use of the new road as an alternate commuter route. They are as follows:

- Speed-bumps, traffic lights, and/or stop signs on new road from Torrance Circle/Boulevard to turnabout where N. Pacific Ave. meets N. Harbor Dr.
- No motorcycles on new road from Torrance Circle/Boulevard to turnabout where N. Pacific Ave. meets N. Harbor Dr., from 9:00 p.m. to 9:00 a.m. every day.
- No right turn from N. Harbor Dr. to Herondo St. from 7:00 a.m. to 9:00 a.m., Monday to

Friday (similar to existing prohibition of entry to Monterey Blvd. from Herondo St. for same period).

Response to Comment PC317-3

The commenter suggests implementation of measures to restrict traffic on Pacific Avenue and elsewhere in and near the project site. Although only one block long, Pacific Avenue provides a key connection between Catalina Avenue and Harbor Drive, serving not only the residents along the block but also the uses in the waterfront area. As noted in Draft EIR Chapter 2, one of the project objectives is to provide improved vehicular access , at which implementation of the proposed project with the Pacific Avenue Reconnection would improve vehicular access in the local area and support that objective. Installation of speed bumps, traffic lights, and/or stop signs, as suggested by the commenter, would hinder the flow of traffic along the subject street segment and therefore would compromise the project's ability to respond to that project objective. Additionally, the installation of speed-bumps, traffic lights, and/or stop signs along the subject street segment would result in air quality and noise impacts that would not otherwise occur with the project as currently proposed, due to repeated vehicle deceleration and (re)acceleration associated with approaching and departing from such traffic control devices. The City of Redondo Beach's policy on installing speed cushions (a form of traffic calming devices similar to speed humps) indicates that these traffic-calming devices "shall only be installed on local neighborhood residential streets."[38] Pacific Avenue would be designated as a collector street, and therefore speed cushions (and/or humps) would not be considered for this type of street. Additionally Harbor Drive is listed as exempt from speed cushion installation because of its designation and use as an access route for the Fire Department. Per the Manual on Uniform Traffic Control Devices, stop signs are used for intersection control.[39] Stop signs are typically not installed for speed control alone.

The commenter's suggestion to ban motorcycles from Torrance Circle is considered legally infeasible. The state has plenary power and has preempted the field of traffic control. (Vehicle Code Section 21.) More specifically, California Vehicle Code Section 21101.6 states "local authorities may not place gates or other selective devices on any street which deny or restrict the access of certain members of the public to the street, while permitting others unrestricted access to the street." While some exceptions have been permitted for certain categories of vehicles, such as trucks or tractors, motorcycles are not inherently noisy, and must comply with noise limits contained under California Vehicle Code Sections 27201 and 27202. Furthermore, such limitations would, in practice, be difficult to enforce, and are not expected to significantly reduce or avoid a significant noise impact and would simply relocate the vehicles to a different location adjacent to other structures. The comment also suggests "no right turns from N. Harbor Drive to Herondo St." This intersection is located approximately 0.5 mile north of the project site; there is no significant noise impact at, or in proximity to this location. (See Response to Comment AL001-11 [Noise Monitoring Location #10].) Furthermore, such a limitation would simply relocate those vehicles to another location and is not anticipated to significantly reduce an impact. The comment also suggests installation of "speed-bumps, traffic lights, and/or stop signs on new road."

COMMENT LETTER NO. PC318 CAYLA DEAN

Comment PC318-1

From birthday breakfasts to family reunions to father-daughter talks over cups of coffee, Polly's has been the location of so many of my dearest memories. To see it destroyed and have a Starbucks or some chain constructed in its place would be truly heartbreaking. Like the memories they've given me, Polly's and all the

38 http://www.redondo.org/civica/filebank/blobdload.asp?BlobID=13715

39 http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2014/Part2_rev1.pdf,Section 2B.04

pier businesses are irreplaceable. Please don't let the people of the South Bay down.

Response to Comment PC318-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC319 JULIAN HARVEY

Comment PC319-1

Please accept the following comments/reservations regarding the Waterfront Draft Environmental Impact Report.

Sports Fishing Pier

This should be rebuilt at its current location – not demolished/not rebuilt. It is a very worthwhile and well used feature of the current harbor.

Response to Comment PC319-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Comment PC319-2

Boat Launch

Should not be where proposed by the main project – i.e. adjacent to where Joe's Crabshack currently is. This location provides not enough parking and also is too close to Seaside Lagoon and the Sportsfishing Pier.

It should be located to the south end of Mole D, i.e. similar to Alternative 8 – Mole D – option 2 – two lane ramp and 40 parking spaces. Redondo is a harbor and must cater for more boaters bringing their boats to Redondo by vehicle/trailer.

Apart from the above two reservations I am fully in favor of the project as proposed.

Response to Comment PC319-2

The commenter states an opinion/preference relevant to the project and the projects approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC320 JAKE PORTER

Comment PC320-1

I am writing to support the long-standing sport fishing operation in King Harbor. This has been a main stay of the South Bay for many decades that generations of families have enjoyed, and it is critical for thousands of people in and around the South Bay community to keep this source of recreation and local jobs.

The Waterfront Development project and the sport fishing operation can easily co-exist. The South Bay

community would benefit greatly from your support for local sport fishing.

Response to Comment PC320-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The comment is acknowledged and will be included in the Final EIR and presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC321 JULIE EINWICH

Comment PC321-1

I'm writing this in support of the wonderful community I am a part of. I moved to the South Bay area in 1987 from Chicago and after working hard was finally in a position to purchase a condo at my favorite beach/pier community. I have travelled and lived in different places but always find my way back to Redondo. I feel that the community is not the place for the type of development that is at hand. This type of development should be redirected to neighboring communities so that area can be pressured for what it is. If revitalizing is to be done, just focus on what is already there and working instead of creating something new.

Response to Comment PC321-1

The commenter states an opinion/preference relevant to the project approval; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC322 TIM CHARLES

Comment PC322-1

Please be advised here is my response and questions on the CenterCal Development DEIR. I eagerly await your response.

Traffic

I found it almost impossible (even laughable) that you state there will be no traffic impact from this new development. At a minimum, the lowest estimates would likely be north of 12,000 additional car trips per day. There is already major daily traffic along PCH and no direct freeway access so how is this remotely possible?

What are the specific proposed mitigations to handle the additional traffic?

Response to Comment PC322-1

Contrary to the assertions in the comment, Draft EIR Section 3.13 disclosed several significantly impacted intersections. However, these impacts would be reduced to less than significant with implementation of mitigation measures. Regarding specific mitigation associated with traffic and the proposed project, refer to Section 3.13 and Appendix L1 of the Draft EIR for details and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for a brief summary.

Comment PC322-2

New Road

Why a new road for thru traffic along the International Boardwalk? This will create unneeded new traffic directly under residential areas. We were lead to believe in the Center Cal input meetings that a new road would only be for a people mover (ex. Trolley). Why not?

How will this traffic be controlled? Monitored?

Response to Comment PC322-2

As described throughout the Draft EIR (in particular, Chapter 2, Project Description and Section 3.13, Traffic and Transportation), the Pacific Avenue Reconnection would enhance circulation at the project site. In fact, until the 1970s, when the original Pacific Avenue and El Paseo (streets along the waterfront) were removed, the past conditions consisted of connection of the public to the waterfront via Pacific Avenue, El Paseo, Harbor Drive and various other streets (see Figure 2-2, page 2-7 of the Draft EIR, which shows a map of the City from 1927 including the former configuration of Pacific Avenue and other waterfront roadway connections). The Pacific Avenue Reconnection would be a reconnection of the roadway access that once served to provide public access and connectivity along the coastline. This roadway would also greatly improve emergency access and protection service throughout the project site (refer to Section 3.11, Public Services of the Draft EIR for additional information).

Although only one block long, Pacific Avenue provides a key connection between Catalina Avenue and Harbor Drive, serving not only the residents along the block but also the uses in the waterfront area. However, the Draft EIR did analyze the project without the Pacific Avenue Reconnection (Alternative 5) in Chapter 4, Analysis of Alternatives.

Comment PC322-3

Noise

So, if I understand it, there is no way to mitigate noise for neighboring residents who will have to endure major construction likely for two plus years.

How do you propose that residents at The Village, Seascape I, II, III and Ocean Club handle this?

Response to Comment PC322-3

Section 3.10, Noise of the Draft EIR details that even with several mitigation measure (including equipment mufflers, limitations on stationary equipment, limitations on equipment staging areas, limitations providing for the use of electric power tools, and sound barriers), there is no way to guarantee that the project's construction noise impacts could be fully mitigated; therefore, the noise impacts would remain significant and unavoidable during construction. This is due to the proximity of the residential neighborhood, which is immediately adjacent to the eastern boundary of the project site. Please see Draft EIR pages 3.10-33 through 3.10-37 for additional details. As also noted in Section 3.10.3.1, interior noise levels would be significantly less than the exterior noise levels discussed under Impact NOI-4 due to building standards regulations requiring residential structures to meet specific noise insulation requirements.

Comment PC322-4

Parking

How do you expect parking be handled when you're building 523,929 sq. feet of additional development (140% more development) but only 8% more parking?

Response to Comment PC322-4

The commenter is incorrect that the project is "523,929 sq. feet of additional development" [emphasis added]. Of the approximately 523,939 square feet of development, 312,289 square feet is new/additional. The characteristics of existing and proposed project parking is discussed in Master Response #7: Waterfront Parking.

Comment PC322-5

Can you explain how views will not be impacted on Harbor Drive and the Beryl intersection when you're adding a new 3 story parking structure on the north end?

Response to Comment PC322-5

Please refer to Master Response #9: Views and Scale of Development.

Comment PC322-6

Can you explain why you're not including this 3 story parking structure in the full square footage of the size/scope of the development? Why does the 523,929 sq. footage not include that structure?

Response to Comment PC322-6

The Draft EIR analyzes the physical impacts associated with demolition and construction of parking facilities in the individual resources chapters. To the extent the commenter is asking a question regarding compliance with the City's development standards, please see the City's official Record of Interpretation included in Section 3.3 of Chapter 3, Modifications to the Draft EIR of the Final EIR for further details.

COMMENT LETTER NO. PC323 — JAMES LIGHT – BUILDING A BETTER REDONDO, REDONDO RESIDENTS FOR RESPONSIBLE REVITALIZATION, RESCUE OUR WATERFRONT, AND SOUTH BAY PARKLAND CONSERVANCY

[For all the photos/figures included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Comment PC323-1

Attached are comments to the Waterfront DEIR…I also received three more email from Jim which has the reference documents to his comments.

From: James Light
[mailto:jim.light1@verizon.net] Sent:
Monday, January 18, 2016 10:12 PM
To: Eleanor Manzano <Eleanor.Manzano@redondo.org>; Michael Webb <Michael.Webb@redondo.org>; katie.owston@redondobeach.org; Bill Brand <Bill.Brand@redondo.org>; Stephen Sammarco

<Stephen.Sammarco@redondo.org>
Cc: Allen Nafissi Candace <candacekallen@gmail.com>; Todd Loewenstein <loew4567@yahoo.com>; Holmes Martin F <goholmes@mit.edu>; Nils Nehrenheim <nils.nehrenheim@gmail.com>; Cohen Melanie
<dolfanmeli@yahoo.com> Subject: Updated DEIR Comments

Eleanor and Katie,

On behalf of BBR, ROW, SBPC and R4, I am submitting our comments to the Waterfront Draft EIR. The Attachment represents our updated comments to the The Waterfront Draft EIR. Please replace the original upon receipt and verification of readability. Please acknowledge receipt and the ability to open and read the document. I have had rejections from Katies email, it appears to have a size limitation that others do not. Please ensure Katie gets a copy.

I have included the City Attorney again, because the project is not in compliance with the California Coastal Act and the Redondo Beach Local Coastal Plan. Additionally, the project description is not mature enough for the project DEIR that is intended to result in the granting of development entitlements. The DEIR is a very biased document that blatantly disregards objectivity and shows extreme bias toward the development. The lack of project specificity and the obvious bias are violations of CEQA. We wanted to give the City Attorney advanced warning of these conditions so he can evaluate for himself now, if he has not already.

Please email me at the address below or call 310-989-3332 if you have any questions, comments, or problems opening the attachment.

[For the cover page and table of contents that follow this text, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC323-1

This comment is an email from Eleanor Manzano forwarding an email from Jim Light on behalf of BBR, ROW, SBPC and R4. The environmental issues raised in this comment are addressed in Response to Comments PC323-2 through PC323-139 below.

Comment PC323-2

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.***

Response to Comment PC323-2

This comment is largely a summary issues raised in greater detail in Comments PC323-4 through PC323-137. Please see Response to Comments PC323-4 through PC323-137, which addresses the environmental issues raised in Comment PC323-2.

Regarding the commenter's statement that there is insufficient data, time, means and information for the public to conduct an assessment, the Waterfront Draft EIR was prepared in full accordance with the requirements of CEQA. An extended review period was provided to give the public additional time to review and provide comment on the document and during that period, well over 500 comments were received. Pursuant to CEQA Section 15105, a public review period for a draft EIR may not be less than 30 days (or 45 days when submitted to the State Clearinghouse for review by state agencies) and should not be longer than 60 days except under unusual circumstances. The review period provided for this Draft EIR was 63 days (November 17, 2015 to

January 19, 2016).[40]

The commenter also states there was insufficient time for the public to digest "new studies published by the city on the evening of 15 January 16." The commenter appears to be referencing an informational report considered by City Council at their January 19, 2016 meeting (but released earlier with the City's Agenda Report).[41] As noted therein, the purpose of the January 2016 Walker Report was to provide the City Council with information related to the "costs associated with the parking facilities….an updated estimate of the maintenance expenses associated with extending the useful life of the existing structures and the costs of constructing replacement structures." The current level of deterioration of the parking structures is irrelevant to determining whether the proposed project would have a significant impact on the environment in the individual resources sections of the Draft EIR (the existing parking structures require extensive maintenance and/or demolition). The Draft EIR nevertheless describes the deteriorated conditions of the southern Pier Parking Structure in the Project Description and its relationship to the project objectives. The Draft EIR notes that "many properties are aging and in need of renovation or reconstruction, including the Pier Parking Structure which likely has only five to ten years of service life remaining" based upon the Walker Report prepared in 2012.[42] (Draft EIR page 2-9 and 2-29.) One of the project objectives is "to provide for the repair and replacement of aging and obsolete infrastructure (e.g., Pier Parking Structure)." (Draft EIR Section 2.2.) The updated 2016 draft of the report does not change the project objectives or the environmental analysis included in the Draft EIR. Furthermore, additional information and studies are routinely prepared and utilized after completion of the Draft EIR without the need for additional public review. (See *Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority* (2015) __ Cal.App.4th__, 2015 WL 6383431 [Rejecting argument that an "air quality construction impacts memorandum" prepared after the release of the DEIR needed to be circulated for public review.]; *San Francisco Baykeeper v. California State Lands Commission* (2015) __Cal.App.4th__, 2015 WL 7271956 [Court rejected argument that a new "erosion/sedimentation study (CHE) modeling and analysis" needed to be circulated for public review.].) However, unlike these cases, the updated Walker Report does not affect the environmental impact analysis of the Draft EIR, and instead focused upon financial considerations and ongoing maintenance recommendations.

Comment PC323-3

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 - Is not an adequate definition of the project	- ***Public cannot reasonably respond to all combinations and permutations possible*** - ***DEIR should be redone with more specificity***

40 The review period exceeded a 60-day review period by three days so that it would not end on a weekend or holiday.

41 http://redondo.siretechnologies.com/sirepub/cache/16/4zd523z4knwg5utajvkkekla/91259041420160514588 92.PDF

42 The Walker Report prepared in 2012 was expressly identified as a reference document and made available. See Draft EIR, Chapter 6, page 2.

	- Project definition immature - Impacts of alternative, particularly alternative boat ramp locations is not adequately assessed.	

Response to Comment PC323-3

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-29 through PC323-37. The project description (Chapter 2 of the Draft EIR) includes all necessary elements pursuant to CEQA Guidelines Section 15124(c), which states that an EIR project description shall include "a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." The alternatives analysis is a separate requirement distinct from the project description. As outlined under CEQA Guidelines Section 15126.6(a), the analysis of alternatives "shall be discussed, but in less detail than the significant effects of the project as proposed."

The Draft EIR provides enough specificity under CEQA to evaluate the potential environmental impacts of the proposed project and alternatives and redoing the EIR, as suggested by the commenter is not warranted.

Comment PC323-4

Item	*Issue/Concern*	*Conclusion*
Visual Resources	- DEIR cherry picks favorable views while ignoring obvious significant view impacts. - DEIR contradicts findings in previous city EIR - 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.*** - Reaccomplish DEIR view assessments - Redesign project to protect at least 50% of current views from Harbor Drive. - Redesign project to protect harbor views from Czuleger Park.

Response to Comment PC323-4

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-39 through PC323-50, which addresses the adequacy of the visual analysis performed in the Draft EIR. Additionally, as discussed therein, while views from the Harbor Drive would be partially reduced at certain locations, the proposed project increases other views along Harbor Drive and opens new views from the Pacific Avenue Reconnection and the new main street and maintains views from the designated protected view points in Czuleger Park. Therefore, a less significant impact would occur and no project alternative consisting of a redesign as suggested by the commenter is warranted or required under CEQA. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-5

Item	*Issue/Concern*	*Conclusion*
Aesthetic Resources	***- DEIR ignores massing impact -weighs development over views***	***Massing ruins quaint feel of harbor and represents a significant impact. - Redesign project to reduce massing. Eliminate huge megalithic buildings.***

Response to Comment PC323-5

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-40 through PC323-52. As described therein, no significant impact relative to massing would occur and no project alternative with a redesign as suggested by the commenter is warranted or required under CEQA. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-6

Item	*Issue/Concern*	*Conclusion*
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***

Response to Comment PC323-6

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-79 and PC323-80. As described therein, the land exchange would enhance the physical configuration of the trust land and would better meet the intent of the Public Trust enacted to provide a benefit to the people of California. Alternative 4 – No Property Exchange with the State analyzed in Chapter 4, Analysis of Alternatives, addresses an alternative where no land exchange would occur. It is not clear based on the comment, what land exchange or alternative plan is being suggested by the commenter.

Comment PC323-7

Item	*Issue/Concern*	*Conclusion*
Vehicular Traffic	- DEIR misrepresents increase in traffic - DEIR ignores cumulative impacts - DEIR failed to assess impact of short road segments and turning queue blockages of primary access roads - DEIR failed to assess weekend traffic - peak traffic for both	***- Substantial reassessment of traffic impacts required to account for critical conditions of traffic infrastructure that represent significant limitations on capacity. - Traffic impacts are worse than stated in the DEIR. Doubtful the stated mitigations will***

	recreational and retail/restaurant/ entertainment uses - 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 - New bike track produces significant impacts to Harbor Drive traffic capacity. Impacts are not adequately evaluated in the traffic assessment. - Reconnection of Harbor Drive to Torrance Blvd primarily serves through traffic, not project internal traffic flow.	***address all issues.*** ***- Weekend traffic must be assessed.*** ***- The reconnection of Torrance Blvd and Harbor Dr would primarily service through traffic. The impacts do not justify it. Eliminate the reconnection.***

Response to Comment PC323-7

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-106 through PC323-131. As described therein, the traffic analysis performed the Draft EIR meets the requirements on CEQA and impacts are properly disclosed and mitigated. Further, weekend traffic counts show that weekday evening peak hour counts were higher than the summer Saturday midday counts at 15 intersections in the study area for which data is available (please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for information of weekend traffic. Additionally, the Pacific Avenue Reconnection would primarily serve project traffic and would have project benefits such as improved emergency vehicle access.

Comment PC323-8

Item	*Issue/Concern*	*Conclusion*
Bike Circulation - main bike route through project	- Proposed configuration requires bike traffic to oppose vehicle traffic flow on Torrance Blvd - Proposed configuration requires two hazardous traffic crossings at complicated intersections exacerbated by new unfamiliar visitors - Proposed configuration exacerbates loss of harbor views from Harbor Drive bike path	***- Significant impact to bicyclist safety and views*** ***- Project should be redesigned to eliminate dangerous double crossing of Pacific Ave and ensuring safety while riding against Torrance Blvd traffic flow*** ***- - Project should be redesigned to protect at least 50% of current ocean and harbor views.***

Response to Comment PC323-8

This comment is a summary of the issues raised in greater detail in Comment PC323-97. See Response to Comment PC323-97. As described therein, no significant impacts relative to views and safety would occur and no project alternative consisting of a redesign as suggested by the commenter is warranted or required under CEQA. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-9

Item	*Issue/Concern*	*Conclusion*
Bike Circulation - secondary route through project	- DEIR makes absurd assumption that heavy bike traffic and pedestrian traffic could commingle on same paths. - Currently prohibited on similar areas of pier and harbor and Hermosa's pier area - 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.*** ***- Redo DEIR assessment accordingly***

Response to Comment PC323-9

This comment is a summary of the issues raised in greater detail in Comment PC323-97. See Response to Comment PC323-97. As described therein, no significant impacts relative to bicycle safety would occur and no project alternative consisting of a redesign as suggested by the commenter is warranted or required under CEQA. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-10

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 - No parking requirements assessed for Seaside Lagoon visitors, paddle boarders, kayakers, pier fisherman, and passengers of whale watching and sport fishing commercial vessels. - Inadequate parking location for slip leasers, paddle boarders, and kayakers. Current plan represents a	- ***Significant impact to recreational use of harbor*** - Parking requirements are understated and inadequate for recreational uses of harbor waters. - Additional spaces should account for growing SUP, kayak, whale watching, sport fishing, and Seaside Lagoon usage - Parking should be reconfigured to support and encourage recreational uses of waterfront.

	deterrent to recreational uses of the waterfront.	- 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

Response to Comment PC323-10

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-100 through PC323-105. As described therein and in Master Response #7: Waterfront Parking, adequate parking would be provided for all users of the waterfront, including for boaters and other recreational users. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-11

Item	*Issue/Concern*	*Conclusion*
Recreational Access – Traffic	- If properly evaluated, the traffic generated by the new development will impact access to coastal dependent recreational uses of the harbor - Particularly around the Portofino Way, Harbor Drive intersection	***- Negative impacts on coastal dependent recreation would be significant*** ***- Mitigations such as substantive increase in road capacity in the area or scaling back development should be implemented***

Response to Comment PC323-11

This comment is a summary of issues raised and addressed in greater detail below relative to the traffic analysis. In particular, see Response to Comments PC323-100 through PC323-130. As described therein, the traffic analysis meets the requirements of CEQA, and with application of mitigation, traffic impacts would be less than significant. Traffic would not significantly impact access to the project site, including recreational users, and no additional mitigation is required.

Comment PC323-12

Item	*Issue/Concern*	*Conclusion*
Recreational Access – Parking	- Inadequate parking for trailer boaters at boat ramp - No parking requirements assessed for Seaside Lagoon, Paddle boarders, kayakers, whale watchers, sport fishing vessel passengers, and pier fishermen. - 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*** - Increase parking or decrease development - Reconfigure parking to support and encourage coastal dependent recreational uses of the waterfront

Response to Comment PC323-12

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-100 through PC323-105. As described therein and in Master Response #7: Waterfront Parking, adequate parking would be provided for all users of the waterfront, including for boaters and other recreational users. With mitigation, impacts relative to parking would be less than significant and no additional mitigation is required. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-13

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 - Previous EIR and zoning mandated Seaside Lagoon expansion - Swimming pool, fountains, and slides are removed - According to consultant, no lifeguards are planned - Kids forced to swim in untreated harbor waters - the DEIR did not include any water quality testing of harbor waters at all. - Area of harbor water entry known collector of floating trash - Potential for sea lion use is understated. Mitigation plan	***- Impact to recreational use of Seaside Lagoon significant*** ***- Project creates hazards to coastal recreation not currently present*** ***Mitigations should include*** - Preventing any new development from encroaching on the current park envelope - Expanding parkland to adjacent Joe's Crab Shack site as stated in previous EIR - Retaining a pool feature - Retaining a water entry for kayakers and SUP'ers - Relocating the trailer boat ramp or breakwater to mitigate safety

	approval by NOAA low probability as demonstrated on similar situations at other Southern California beaches - Harbor waters not tested for water quality as part of the DEIR - 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 - Tide dramatically affects usable land portion of park - Tide affects usable swim area of park - **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 - Dredging of swim area has not been assessed, area shoals currently ***- DEIR wrongly assesses open space amenities in private commercial development make up for loss of public parkland and coastal dependent recreation***	hazard with SUP'ers and kayakers ***If the only swimming feature is to use harbor waters*** - Perform water quality testing so public understands the impact - Evaluate impact of shoaling and frequency dredging would be required - Require lifeguards - Define swimming area and controls so that public can assess impact - Perform tidal assessment to assess area changes in both swimming area and land area - Assess number of daily users the reconfiguration could reasonably accommodate, ensure it meets or exceeds current capacity - 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

Response to Comment PC323-13

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-84 through PC323-87. As described therein, recreational uses at Seaside Lagoon would continue and the issues raised by the commenter, including water quality, sea lions, park size, safety, and modification in amenities provided, would not result in significant impacts. Therefore, no additional mitigation is required. Further, no loss of public parkland or coastal dependent recreational would occur under the proposed project, and the Draft EIR does not assess open space in the commercial development as a replacement of parkland or coastal dependent recreation as suggested by the commenter. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-14

Item	*Issue/Concern*	*Conclusion*
Hand launch boat ramp	- Insufficient parking to support current and growing number of SUP'ers and Kayakers	***- Project represents a significant impact to a popular and growing use of the harbor***

	- Lack of access to safely offload equipment within reasonable distance to water entry/exit point - Distances to parking create theft opportunities for expensive equipment - deters users - 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 - If sea lions haul out, could lose ability to launch or return - Sea lion haul out creates safety concerns and could prevent use of entry/exit point - Proximity to trailer boat ramp presents a hazard to SUP'ers and kayakers. New breakwater creates blind spot for trailer boaters.	***Mitigations should include:*** - Adequate reserved parking in close proximity to launch point without crossing active roads and shopping dining areas - 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 - 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 - Alternatives that collocate hand launch with trailer boat launch should be prohibited.

Response to Comment PC323-14

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-88 through PC323-90. As described therein and in Master Response #7: Waterfront Parking and Master Response #4: Modifications to the Seaside Lagoon, parking, sea lions, and proximity to the boat launch ramp would not limit use of the harbor by SUP'ers and kayakers. No greater environmental impacts would occur and no new mitigation is required. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-15

Item	*Issue/Concern*	*Conclusion*
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 - Hazardous configuration and proximity to proposed hand launch boat beach access creates conflicts and blind spots - Traffic uses will be concentrated on Portofino Way and Harbor Drive in this vicinity, creates access deterrent to trailer boaters - 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*** ***Mitigations should include:*** - Providing adequate number of parking spaces, minimum of 30 pull through double trailer spaces per ramp and adequate single spaces for guests - Adequate maneuvering space to reduce risk of damage - Reconfiguration or movement of boat ramp to eliminate blind spots and other hazards related to SUP/Kayak launch area - Redo traffic analysis and assess mitigations to ensure traffic is not a deterrent to use of boat ramp

Response to Comment PC323-15

This comment is a summary of the issues raised in greater detail in Comment PC323-94. The issues raised are addressed in Response to Comment PC323-94 and Master Response #8: Boat Ramp in King Harbor. As described therein, the boat ramp would not create a new safety risk beyond that identified in the Draft EIR or be limited by parking and/or traffic. No additional mitigation is required. However, your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-16

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***	***- Insufficient data in the DEIR for the public to fully understand and evaluate impacts of alternate locations of boat ramp*** ***- Select final location and configuration of boat ramp and redo DEIR to access specific and comprehensive impacts***

	scope of the project area defined and evaluated in the DEIR.	

Response to Comment PC323-16

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-37 and PC323-95 and Master Response #8: Boat Ramp in King Harbor. As described therein, any use/re-use of Mole B is not part of the proposed project and would be addressed under a separate CEQA review. The alternatives analysis includes six boat ramp location and configuration options (see Alternative 8 – Alternative Small Craft Boat Ramp Facilities within King Harbor in Chapter 4, Analysis of Alternatives). Consistent with CEQA Guidelines Section 15126.6, sufficient information is provided to allow meaningful evaluation and comparison of the project alternatives with the proposed project as required by CEQA.

Comment PC323-17

Item	***Issue/Concern***	***Conclusion***
Basin 3, Redondo Beach Marina slips	- Potential halving of slip space reduces coastal dependent recreation and commercial use of harbor and navigable waters - 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 - 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. - 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. Project should be redesigned to eliminate impacts to use of Basin 3*** - Require full replacement of current slips - Provide 24 hour operation of drawbridge with rapid response - Protect / prioritize parking and convenient access to Basin 3 slips.

Response to Comment PC323-17

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-73 and PC323-96, and Master Response #7: Waterfront Parking. As described therein, use of Redondo Beach Marina in Basin 3 would not be artificially limited by types of boats allowed in the marina, reconfiguration of slips, parking availability, or the pedestrian/bicycle bridge, and no significant impacts relative to use of Basin 3 would occur.

Comment PC323-18

Item	*Issue/Concern*	*Conclusion*
Cumulative impacts	- Cumulative impacts not adequately assessed for known projects in work ***Known projects include:*** - Reuse of AES power plant site or building of new AES power plant - Completion of Shade Hotel - increased traffic and unique impact of valet parking from Shade Hotel to parking lot off Portofino Way - New tenants filling in Green Street development that has been largely vacant during traffic counts for project - New Sketchers Headquarters project in Hermosa Beach on PCH - 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*** ***As a minimum the DEIR should be reaccomplished to address realistic cumulative impacts:*** - DEIR should use Measure B zoning of AES site to evaluate impacts from that site - 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

Response to Comment PC323-18

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comment PC323-38, and Master Response #2: Cumulative Impacts and Master Response #1: AES Power Plant Site. As described therein, the proposed project is consistent with land use planning documents that address the planning area comprehensively, and cumulative impacts are addressed consistent with CEQA requirements.

Comment PC323-19

Item	*Issue/Concern*	*Conclusion*
Land use violations	- Total development exceeds development cap set by zoning and LCP. - View protections required by zoning are ignored. Violates zoning, LCP and Coastal Act - Expansion of Seaside Lagoon required by HOC EIR ignored - Paving over public park for new private commercial development road violates zoning, LCP and Coastal Act	***- Project should be redefined to eliminate violations of zoning, LCP and Coastal Act.*** ***- A DEIR should be reaccomplished on a compliant project.***

	- Substantial impacts to coastal recreational and commercial use of the harbor violates zoning, LCP and Coastal Act - Project violates city parking requirements and artificially constrains access to coastal resources violating zoning, LCP and Coastal Act. - Project clearly prioritizes private commercial development at the expense of coastal dependent commercial and recreational uses.	

Response to Comment PC323-19

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comments PC323-54 through PC323-80. As described therein, and in Section 3.9, Land Use and Planning of the Draft EIR, the proposed project is consistent with land use planning documents, including the Local Coastal Program, which is approved under the California Coastal Act and the Coastal Zoning. No redefinition of the proposed project is required under CEQA as suggested by the commenter. However, the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-20

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.***

Response to Comment PC323-20

This comment is a summary of issues raised and addressed in greater detail below. In particular, see Response to Comment PC323-132. As described in Section 3.3, Biological Resources of the Draft EIR, the proposed project must comply with the City's tree trimming and tree removal requirements for trees in the coastal zone as set forth in the Coastal Zoning. No significant impacts associated with tree trimming and removal would occur, and no additional mitigation or other mandates beyond compliance with this measure are required under CEQA.

Comment PC323-21

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***
	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 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.

Response to Comment PC323-21

Comment PC323-23 presents a summary of the commenter's "subjective" opinion comparing the existing setting with the proposed project in regards to recreation, and presents the commenter's conclusion there is a significant impact on recreational uses in the harbor based on that opinion. The comment does not provide a threshold for determining a significant impact, nor is sufficient information provided within this comment that shows deficiencies in the EIR analysis. Issues raised in the summary table presented in Comment PC323-21 are presented and addressed in greater detail below, in particular see Comments PC323-39 through PC323-105 below.

Comment PC323-22

1.1 Project Alternatives

The project alternative assessments are tainted by the impact assessments earlier in the DEIR and are therefore flawed.

Response to Comment PC323-22

Please see Response to Comments PC323-39 through PC323-137 below regarding the adequacy of the impact assessments presented in the Draft EIR. As described in those responses, the Draft EIR provides adequate assessment of impacts of the proposed project as required by CEQA, and the same impact thresholds and methodology are applied to the analysis of alternatives.

Comment PC323-23

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.

Response to Comment PC323-23

As described in Section 2.2 of Chapter 2, Project Description of the Draft EIR, the objectives for the proposed project were developed based on current waterfront planning efforts undertaken by the City, including the latest amendments to the City's Local Coastal Program (LCP), which was determined to be consistent with the Coastal Act by the Coastal Commission, as discussed in Response to Comment PC323-63 below. These planning efforts include the identification and implementation of goals and policies that are supportive of revitalizing the harbor both to highlight the unique coastal setting and to optimize the location and increase economic sustainability. The City's planning efforts incorporate both coastal-depended and coastal-related uses as described in Section 2.1 in the Chapter 2, Project Description, and Section 3.9, Land Use and Planning of the Draft EIR. The objectives of the proposed project are consistent with, and supportive of, the City's on-going planning efforts and, as such, support augmenting both water and land uses at that project site to improve both recreational uses and revenue generation, as well as enhancing site access and improving infrastructure and safety. The commenter presents no information or analysis to the contrary.

Comment PC323-24

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.**

Response to Comment PC323-24

Please see Response to Comments PC323-29 and PC323-95.

Comment PC323-25

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.

Response to Comment PC323-25

The alternatives analysis is a separate requirement distinct from the project description. As outlined under

CEQA Guidelines Section 15126.6(a), the analysis of alternatives "shall be discussed, but in less detail than the significant effects of the project as proposed." Please see Response to Comment PC323-95 and Master Response #8: Boat Ramp in King Harbor.

Comment PC323-26

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.

Response to Comment PC323-26

The comment suggests identifying a "superior" alternative that includes the entire waterfront area and well as areas outside of the waterfront. This suggested "superior" alternative encompasses a much larger area that is well outside the scope of the proposed project and includes an area that is not currently available for development nor for which there are currently any actionable development proposals. As such it does not present a "reasonable alternative" to the proposed project pursuant to CEQA Guidelines Section 15126.6. For additional information regarding addressing development of project site in conjunction with AES power plant site, see Master Response #1: AES Power Plant Site. The alternatives analysis in the Draft EIR already includes several alternatives with the elimination of the Pacific Avenue Reconnection (Alternatives 1, 2, and 5). As outlined in Response to Comment PC323-56, the proposed project includes numerous improvements to Seaside Lagoon. Regarding the two recommended alternatives proposed by the commenter, please see Response to Comment PC323-137.

Comment PC323-27

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.***

Response to Comment PC323-27

Comment PC323-27 summarizes assertions described in more detail in Comments PC323-28 through PC323-36, and PC323-54 through PC323-78. As described in responses to several comments below, in particular in Response to Comments PC323-54 and PC323-55, and detailed in Section 3.9, Land Use and Planning of the Draft EIR, the proposed project is in compliance with the City's zoning. It is in compliance with the City's adopted LCP, and thereby is in compliance with California Coastal Act. This EIR is a stand-alone document in compliance with CEQA requirements and there are no previous EIR requirements that apply to the project.

As described in Section 15124 of the *State CEQA Guidelines*, the project description in an EIR is required to contain the following information: (1) the location of the proposed project, (2) a statement of project objectives, (3) a general description of the project's technical, economic, and environmental characteristics, and (4) a statement briefly describing the intended uses of the EIR. The *State CEQA Guidelines* states that a project description need not be exhaustive, but should provide the level of detail needed for the evaluation and review of potential environmental impacts. In addition, Section 15146 of the *State CEQA Guidelines* states that "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." In this case, the proposed project consists of the revitalization of approximately 36 acres of the 150-acre harbor area, as part of a City-wide waterfront revitalization effort initiated by the City of Redondo Beach. The main components of the proposed project are demolition of approximately 207,402 square feet of existing structures, replacement of the existing Pier Parking Structure, retention of 12,479 square feet of existing development, and construction of up to 511,460 square feet to include retail, restaurant, creative office, specialty cinema, a public market hall, and a boutique hotel. The total amount of new and remaining development on-site would be 523,939 square feet (304,058 square feet of net new development). The proposed project also includes public recreation enhancements such as a new small craft boat launch ramp, improvements to Seaside Lagoon, new parking facilities, expanded boardwalk along the water's edge, enhanced public open space, and pedestrian and bicycle pathways. Site connectivity and public access to and along the water would be improved by the establishment of a new pedestrian bridge across the Redondo Beach Marina/Basin 3 entrance and the reconnection of Pacific Avenue. This project description is of appropriate detail to serve as the basis for the environmental analysis contained in this project-level Draft EIR.

As reflected in the CEQA process requirements, the Draft EIR was published for review by the public and agencies, proving the opportunity to comment on the information and analyses presented in the Draft EIR and the requirement that the lead agency, in this case the City of Redondo Beach, prepare written responses to those comments. To the extent there are specific concerns regarding the Draft EIR content and analysis, concerns can be expressed during the Draft EIR review period and addressed and presented in the Final EIR for consideration by decision-makers.

Comment PC323-28

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.

Response to Comment PC323-28

The Heart of the City (HOC) EIR is a Master EIR and Program EIR prepared over a decade ago and certified in 2002 that analyzed the Heart of the City Specific Plan (discussed in Section 2.1.1.5 in Chapter 2 of the Draft EIR). The HOC EIR disclosed impacts associated with a much larger project/area (150 acres). In 2007, after the referendum on the Heart of the City Specific Plan (associated with the HOC EIR), the City prepared an Initial Study to determine whether proposed Local Coastal Program amendments would be within the scope of the impact analysis in the HOC EIR. This Initial Study expressly noted that:

> "the project[43] is similar to the project considered in the HOC Master EIR except that it is scaled down and would not permit any new residential uses. The maximum buildout under the project is less than the project studied by the HOC Master EIR and furthermore is less than the "Waterfront Only Alternative" project studied in that certified EIR (a reduced impact alternative). The "Waterfront Only Alternative" considered a net increase of 998,287 square feet of commercial development plus 488 additional residential units in the area identified as the Waterfront zone." The total building of this project would be limited to a net increase of 750,000 square feet which is substantially below buildout under the reduced impact "Waterfront Only Alternative" project studied in the HOC Master EIR as well as below buildout for the Waterfront zone considered in that certified Master EIR."

As noted in this Initial Study, the HOC EIR was based upon different development intensities, a different study area, and a mix of uses, as well as a different environmental baseline (i.e., existing conditions against which impacts are measured) which are not the same as the currently proposed Waterfront project. As further discussed in the Initial Study "Each specific development project would be subject to separate environmental review. Such environmental review may require that a traffic study be provided for the specific development to determine appropriate mitigation measures related to the impacts of the specific project." As further discussed in the City Council Admin Report on April 22, 2008 for the LCP amendments which adopted the components of the Measure G zoning, "all individual projects are proposed after the land use documents have been amended will be subject to their own environmental review process and to project-specific mitigation measures, as appropriate." Furthermore, these amendments were also statutorily exempt from CEQA, pursuant to CEQA Guidelines Section 15265.

The commenter's current reliance upon the analysis or conclusions in the HOC EIR are also inconsistent with

43 The 2008 LCP Amendments proposed after the referendum, originally included a 750,000 square foot cumulative development cap. After the preparation of this initial study, this cumulative development cap was further reduced to the current 400,000 square foot cumulative development cap.

numerous past comments received from the commenter (Mr. Light) stating that the HOC EIR was "outdated," "flawed," "unusable," and "[t]he [HOC] EIR should not be used for any determination of impact":

- March 25, 2007 Email from Jim Light: "The HOC EIR is rendered invalid by new information included below: 1. Conditions have changed dramatically since the HOC EIR was certified…Traffic impacts of the proposed zoning changed must be analyzed in light of current conditions which have significantly increased from 2002 levels….2…New methods for analyzed air pollution produced by traffic are now in use. Air pollution impacts must be reaccomplished using current, more accurate methods…The EIR uses the 1994 HCM method for calculating traffic impacts. New methods are currently used that predict traffic impacts more accurately. The method used in the HOC is outdated. Traffic evaluations must be reaccomplished using more accurate methods. The HOC EIR assumed the power plant was replaced by condominiums and commercial uses. Under the proposed zoning change, the powerplant will continue in operation without any modification. The environmental impacts must be reanalyzed in light of the real conditions existing currently at the power plant. The HOC EIR was the subject of a lawsuit that was only dropped when the City rescinded the specific plan and zoning changes. The lawsuit was aimed at the inadequacy of the EIR in a number of areas. *The EIR should not be used for any determination of impact since it was so flawed and lawsuit was never completed….The EIR should be reaccomplished and mitigations should be reevaluated in light of this new data per CEQA requirements.* New data has become available that proves the EIR inadequate in its findings…The HOC EIR has been rendered invalid by the new data released earlier. This invalidates the IES for the proposed harbor rezoning. A new environmental impact report is therefore required per CEQA." (Emphasis added.)

- March 29, 2007 Email from Jim Light: "In addition to the HOC EIR faults defined below, the waterfront only option did not include any quantitative analysis to back its statements and therefore cannot be used for the current zoning proposed."

- August 30, 2007 Email from Jim Light: "I ask you to reject this use of a flawed IES relying on an outdated and flawed EIR. Too many changes have occurred since the HOC EIR was accomplished and new data has come to light that invalidate the old EIR…The HOC EIR was the subject of a lawsuit and hundreds of resident complaints, because of its blatant inadequacy."

- August 31, 2007 Email from Jim Light: "Significant new data has come to light since the original HOC EIR. Also the baseline traffic conditions have changed substantially since the HOC EIR, which used 2001 traffic data, thus circumstances have changed. The new data and new circumstances require a new impact analysis. *The City cannot rely on this outdated EIR and its outdated calculations*…Significant new evidence and information has come to light since the HOC EIR that render it unusable as a basis for determination of impact in this rezoning."

- September 12, 2007 Email from Jim Light: "The HOC EIR Alternative 6 does not assess a development or zoning similar that defined in IES-00. According [sic] Table V-6 in the HOC EIR, the distribution of the new zoning is not anything near that proposed in IES-003…Only 45% of the development in HOC Alternative is distributed in the same area as the zoning change evaluated in IES-003.

- September 13, 2007 Email from Jim Light: "without further substantiation, these statement, especially with respect to the impact of traffic mitigations, are not more than conjecture and are insufficient to qualify as an adequate environmental analysis…*The use of the HOC EIR to evaluate impacts of the new zoning would violate CEQA and mislead the residents of Redondo.*"

- September 20, 2007 Email from Jim Light: "This new data renders the HOC EIR outdated and unusable

as the basis for evaluation for the proposed zoning change."

- September 26, 2007: "This reasonable analysis renders the HOC EIR and IES-003 as unusable for this zoning change. A new EIR is required."

- September 27, 2007 Email from Jim Light: "I have shown previously that the EIR relied on outdated traffic information and is flawed in its assessment of trip generation. Here, I have demonstrated that the HOC EIR contradicts itself. A new traffic analysis is required."

- October 8, 2007 Email from Jim Light: "I urge the Planning Commission to reject this use of the HOC EIR."

- October 30, 2007 Email from Jim Light: "The evidence presented clearly show that the HOC EIR Alternative 6 and the proposed zoning have little in common…Request the Planning Commission reject the use of the HOC EIR and demand a new EIR based on current conditions taking into account downstream traffic flow impacts." [44]

- April 24, 2008 Email from Jim Light: "I remain disappointed in the Council and staff with regard to the reuse of the HOC EIR….Honest answers to these questions will reveal the inadequacies of the HOC EIR and the fact that it did not evaluate concentrated development at the waterfront…I fully support the Council's compromise cap, but it is difficult for me to stomach approval of such a flawed document as the impact assessment…I really wish you would take the high ground and honesty and integrity in Redondo Beach products [sic] and redo this thing correctly."

The current Waterfront Project does not rely upon (i.e., does not tier from) the 2002 HOC EIR. As noted above, additional project specific details are now known (and reduced in comparison to the HOC EIR analysis), additionally the Harbor Area and surrounding land uses and roadways have changed since 2001, and updated modeling has been utilized. Consequently, the Waterfront EIR was prepared as a stand-alone EIR (consistent with the commenter's earlier requests), and includes project specific mitigation measures. Additionally in numerous comments below, the comment letter incorrectly references the HOC as providing a statement of policy. The purpose of the EIR is to disclose a project's environmental impacts. (CEQA Guidelines Section 15121.) For example, Comment PC323-70, discussed in greater detail below, cites to the HOC EIR's discussion of the Heart of the City Specific Plan policies; however the cited language constitutes an overview of the previously proposed policies from the Heart of the City Specific Plan, which were rescinded pursuant to a referendum. While the Initial Study prepared in 2007 determined that the proposed impacts of the Harbor/Pier zoning would be within the scope of the Heart of the City EIR, this does not mean that the City adopted the text of the HOC EIR as a statement of policy.

As discussed in Response to Comments PC323-54 and PC323-55 and Section 3.9, Land Use and Planning of the Draft EIR, the proposed project is in compliance with the current zoning requirements (Measure G zoning), including the development cap and zoning for Seaside Lagoon.

Comment PC323-29

2.2. Maturity of the Project Description

[44] Redondo Beach Planning Commission Agenda Packet, October 30, 2007.

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.

Response to Comment PC323-29

The Draft EIR provides enough specificity under CEQA to evaluate the potential environmental impacts of the proposed project. CEQA Guidelines Section 15004 (b) states that EIRs should be prepared "as early as feasible in the planning process to enable environmental consideration to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Further, Section 15124 specifies that an EIR project description should be general and "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." Pursuant to CEQA Guidelines Section 15146, the degree of specificity required in an EIR of a project corresponds to the degree of specificity involved in the underlying activity described in the EIR. Accordingly, the EIR addresses the proposed project based on an Application for an Environmental Assessment filed with the City in April 2014 and conceptual plans provided to the City by the project applicant. Detailed engineering and design plans have not yet been submitted for City review and approval. The EIR analyzes the most intense scenario that could be developed under the proposed project, including the maximum building heights and intensity (Figure 2-8), the most conservative physical changes associated with the replacement of Sportsfishing Pier described on Draft EIR 2-57. This approach is consistent with CEQA. The issue of the level of detail of final project design has arisen in numerous CEQA cases.

In the *Dry Creek* case in which the court held that "Appellants have not established that the general description of the diversion structures in the EIR coupled with approval of final designs after the project is approved violated any CEQA mandate." (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20.) In the *Bowman* case the court concluded that compliance with design review can be used to ensure aesthetic impacts remain less than significant" ... even if some people are dissatisfied with the outcome. A contrary holding that mandated redundant analysis would only produce needless delay and expense." (*Bowman v. City of Berkeley* (2004) 122 Cai.App.4th 572, 594.) Most recently *in Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1053-1055, the Court rejected a similar argument from individuals alleging that the project description was inadequate because "the specific configuration and design of particular buildings is left for future review…the Project's street network and layout is conceptual at this point, with the final layout subject to review by applicable agencies…" In rejecting these arguments, the Court of Appeal noted:

> Contrary to these criticisms, the EIR made an extensive effort to provide meaningful information about the project, while providing for flexibility needed to respond to changing conditions and unforeseen events that could possibly impact the Project's final design… as a matter of necessity at this stage in the planning process, there are many Project features that are subject to future revision, and quite likely will be the subjects of supplemental review before the final Project design is implemented. However, the EIR cannot be faulted for not providing detail that, due to the nature of the Project, simply does not now exist.

The commenter also raises concern about figures in the Draft EIR, which identify the site designs as "conceptual." The final configuration of the project is not final until approved by the City's decision-making body. The project final designs will be subject to the City's design review process under RBMC Section 10-5.2502, and would be reviewed to determine whether any such modifications trigger recirculation or supplementation. (CEQA Guidelines Section 15162.) The alleged "contradictions" are responded to in greater

detail in Response to Comments PC323-30 through PC323-36.

Comment PC323-30

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.

Response to Comment PC323-30

Figure 8 provided by the commenter (Draft EIR Figure 2-8) consists of a conceptual illustration of the market hall from plan view (i.e., bird's eye view) and Figure 6 provided by the commenter (Draft EIR Figure 3.1-16) shows the architectural rendering of the market hall's western elevation. Both figures are correct; however, any perceived differences is a matter of perspective (the view from a particular point associated with the two-dimensional rendering of the building so as to give the right impression of its height, width, depth, and position in relation to the site plan). In addition, from the viewers vantage point, the rendering of the proposed market hall (Figure 6 provided by the commenter) is from an angle that does not include the entire first story, but only an approximate 1/3 segment of what is on the conceptual site plan (Figure 8 from the commenter). As described in Section 3.1.4.1 of the Draft EIR, the conceptual views (such as Figure 6 referenced by the commenter [Figure 3.1-16 of the Draft EIR]) were provided by the applicant and are used to assess the broad visual changes that would occur with operation of the proposed project. See Figure 3.1-7 of the Draft EIR for representative view from Czuleger Park. In Figure 3.1-7, the market hall, including the second story, is visible in the visual simulation just to the right of the center of the photograph. As described in Section 3.1.4.1.1 of the Draft EIR, the visual simulations represent the architectural plans for the proposed project. For additional discussion of views from Czuleger Park, see Response to Comment PC323-47.

Comment PC323-31

- The number of parking spaces for the boat ramp varies between 20 and 40 spaces.

Response to Comment PC323-31

As presented in Chapter 2, Project Description, page 2-61 and Table 3.13-21 on page 3.13-67 in Section 3.13, Traffic and Transportation of the Draft EIR, the proposed project includes parking for 20 vehicles/trailers and 20 single vehicles (a total of 40 parking stalls) for the boat launch ramp facility. As presented in Section 4.4.8.2 of Chapter 4, Analysis of Alternatives, the one-lane boat ramp alternatives would have 20 parking stalls and the two-lane boat ramp alternatives would have 40 parking stalls. Please refer to Master Response #8: Boat Ramp in King Harbor and Master Response #7: Waterfront Parking regarding boat ramp parking.

Comment PC323-32

- 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.

Response to Comment PC323-32

Please see Response to Comment PC323-29 above.

Comment PC323-33

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.

Response to Comment PC323-33

The alternatives analysis is a separate and distinct requirement from the project description contained in CEQA Guidelines Section 15124. Furthermore, as outlined under CEQA Guidelines Section 15126.6(c), the analysis of alternatives "shall be discussed, but in less detail than the significant effects of the project as proposed." Nevertheless, the Draft EIR provides a detailed 432 page analysis of alternatives. As presented in Chapter 4, Analysis of Alternatives, the Draft EIR analyzes seven alternatives to the proposed project and an eighth alternative that addresses various small craft boat launch ramp facility configurations and locations throughout King Harbor, along with impacts from developing the proposed project. The Alternative 8 boat launch ramp facility options would also be compatible with Alternatives 4 through 7. The alternatives analysis includes a summary of the alternatives' impact analysis in Section 4.5 and comparison in Tables 4-1, 4-2, 4-3, 4-63, and 4-64. These tables are also consistent with CEQA Guidelines Section 15126.6(c) which states that the alternatives analysis may utilize "[a] matrix displaying the major characteristics and significant environmental effects of each alternative."

The concept of utilizing smaller options is routinely utilized in environmental impact reports. For example, a Court recently upheld an EIR, which utilized several minor options as part of the project description, and also provided an analysis of alternatives. (See *Beverly Hills Unified School District v. Los Angeles County Metropolitan Transportation Authority* (2015) 241 Cal.App.4th 627, 2015 WL 6383431 [This Draft EIR for the subway "includes five Build Alternatives, station and alignment options, the base stations (i.e., stations without options), other components of the Build Alternatives." In rejecting Petitioner's argument in *Beverly Hills* the Court explained "the draft EIS/EIR presented two options for the Century City station, discussed the potential environmental impacts of both stations, including the impacts of tunneling under the high school… The public was given an opportunity to comment on the environmental impacts of both station options." As outlined in the subsequent paragraph, and consistent with the methodology employed in *Citizens for a Sustainable Treasure Island*, the current Draft EIR assumed "for the purposes of analysis, maximum development is assumed to evaluate the environmental impacts." (*Id.* at 1054.) Furthermore, the Court of Appeal has expressly upheld a component mix and match approach to project alternatives. (*California Oak Foundation v. Regents of the University of California* (2010) 188 Cal.App.4th 227.)

Comment PC323-33 refers to the potential elimination of the Sportfishing Pier and possible reduction of slips as two "major alternatives." As described in Chapter 2, Project Description, there are two project element options associated with the Sportfishing Pier and the reconstruction of the slips in Basin 3. Either of which could be accomplished with implementation of the proposed project. As such, the environmental impacts analysis of the proposed project addressed impacts associated with both options for each element where relevant (primarily in Section 3.3, Biological Resources, and Section 3.12, Recreation of the Draft EIR). The air quality and greenhouse gases analysis assumed the greatest amount of construction that could occur for each element (i.e., more slips in the marina and replacement of the pier). Potential impacts associated with other issues areas would not materially change under either project option. As such, the potential environmental impacts

associated with the subject alternatives and project options have been addressed within the Draft EIR. This methodology was described in Draft EIR page 2-57 (Sportfishing Pier options) and page 2-67 (Redondo Beach Marina/Basin 3 reconstruction options). As also discussed by the Court of Appeal in *Treasure Island* "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project…" In addition to page 2-67 in Chapter 2, please see Response to Comment PC323-73 for additional discussion of two options for Basin 3.

Comment PC323-34

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.

Response to Comment PC323-34

Please refer to Response to Comment PC323-95 and Master Response #8: Boat Ramp in King Harbor for details on the various boat ramp locations under consideration as well as safety associated with Yacht Club Way.

Comment PC323-35

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.

Response to Comment PC323-35

The Draft EIR describes a reasonable range of potentially feasible alternatives that will foster informed decision making pursuant to CEQA Guidelines Section 15126.6. As described in Response to Comment PC323-33, the Draft EIR addresses seven alternatives to the proposed project and the eighth alternative includes alternative boat ramp locations and configurations that could also apply to four of the seven alternatives. CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in the Draft EIR. "What is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.) Furthermore, the Court of Appeal has expressly upheld a component mix and match approach to project alternatives. (*California Oak Foundation v. Regents of the University of California* (2010) 188 Cal.App.4th 227.)

Comment PC323-36

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.

Response to Comment PC323-36

The applicant has submitted an application for an Environmental Assessment and any granting of entitlements would be based on the future applications submitted to the City, subject to the City's review and approval process. As discussed in detail in Response to Comment PC323-29, the commenter's request to wait "until final project details" are provided is inconsistent with CEQA Guidelines 15004, which states that environmental review should occur "as early as feasible in the planning process to enable environmental consideration to influence project program and design." The Court of Appeal has concluded on several occasions that additional project modification and staff recommendations can be provided without triggering the need for additional public review. (*South County Citizens for Smart Growth v. County of Nevada* (2013) 221 CalApp.4th 316.) As also discussed by the Court of Appeal in *Treasure Island* "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project…" Review and approval of entitlements for the proposed project would follow the City's procedure for each type of application, including any applicable requirements for public hearings.

Comment PC323-37

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

[For the attachment included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]

Response to Comment PC323-37

Comment PC323-37 presents a letter written subsequent to the release of the Draft EIR. Please refer to Response to Comment PC323-95 and Master Response #8: Boat Ramp in King Harbor regarding boat launch ramp locations.

Comment PC323-38

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.

Response to Comment PC323-38

Please refer to Master Response #2: Cumulative Impacts, which addresses the requirements and methodology associated with the cumulative impacts analysis. As discussed therein, the CEQA Guidelines provides two alternate methodologies for analyzing cumulative impacts, *either* (1) a list of projects approach (which the commenter is impliedly relying upon), *or* (2) growth projections. (CEQA Guidelines Section 15130(b).) Furthermore, the cumulative analysis "need not provide as great detail as is provided for the effects attributable to the project alone." (CEQA Guidelines Section 15130(b).) Consistent with CEQA Guidelines Section 15130(b)(1)(B), the Draft EIR followed the adopted growth projections approach for most resources areas, using a population growth rate of 0.36 percent per year, which was obtained from the Southern California

Association of Governments (SCAG) Integrated Growth Forecast for the City of Redondo Beach.

The SCAG growth projections were developed utilizing comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans and population, housing and employment forecasts for the City, neighboring communities, and the county. The commenter's focus upon the "list of projects" approach ignores nearly all of the factors considered in the SCAG projections, as well as recent trends eliminating the direct relationship between development and traffic and congestion assumed in the comment. For example, analysis of the SCAG 2012 RTP/SCS indicated that vehicle hours of delay in Los Angeles County would decline by 14 percent (2,204 thousands of vehicle hours to 1,895 thousands of vehicle hours, while the population would grow by 14 percent (9,894,657 persons to 11,350,400 persons).[45][46] (See Senate Bill 375 [Regional Transportation Plans] and Senate Bill 743 [Vehicle Miles Traveled Metrics], Assembly Bill 1358 [Complete Streets Act].) Furthermore, the concept that a public agency must use a list of projects for its cumulative analysis has been expressly rejected by the Courts. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 928-931.)

For the traffic analysis in the Draft EIR, the SCAG travel demand model was run and compared to the model-assigned traffic assigned on roadways in the City (City-wide) between the base year (2008) and the forecast year (2035). The net change in volumes was an average decline of two percent City-wide due to the transportation infrastructure improvements, land use changes, and policy strategies associated with SCAG's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS). Therefore, the use of the population growth rate is considered a conservative "worst-case" analysis. The Draft EIR traffic analysis used the SCAG population growth rate of 0.36 percent per year for six years, resulting in total growth of 2.16 percent applied to existing traffic volumes. Compared with an average decline of two percent Citywide derived from the SCAG model, this conservative analysis approach results in a growth rate of four percent higher than forecast in the 2012 SCAG/SCS (two percent increase versus a two percent decline). As an example, this four percent difference would result in an additional 163 PM peak hour trips on Pacific Coast Highway south of Anita Street accounted for in the analysis beyond what would be estimated using the forecast decline in traffic volumes in the City using the SCAG model.

Additionally, as discussed in Section 3.13, Traffic and Transportation of the Draft EIR, while the City is relying primarily upon the growth projections approach, the City also conservatively incorporated the trip generation from several specific development projects located in proximity to the primary routes of trip distribution for the project site.

This included four development projects in the study area (i.e., Shade Hotel Redondo Beach, Legado Redondo,[47] Kensington Assisted Living Facility and the Seabreeze project) were also incorporated into the traffic volumes to characterize Cumulative (2019) Conditions without Project. The information associated with these projects is discussed in Draft EIR page 3.13-44 and Appendix L1, Section 3, pages 36-37. The commenter suggests that the Shade Hotel project altered its parking accommodations and therefore "the solution approximately doubles traffic." The Shade Hotel was slightly revised after its initial project approval to eliminate the underground parking (which was originally proposed to provide half of the parking spaces), in

45 http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_3_12_TransportationTrafficandSecurity.pdf

46 http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_3_10_PopulationHousingandEmployment.pdf

47 Subsequent to the release of the Waterfront Draft EIR, the Applicant for the Legado project modified its project by decreasing the number of proposed residential units (decrease of approximately 30 residential units) and reducing the square footage of the commercial development proposed (by approximately 14,000 sq. ft). These modifications result in a trip reduced from the 2,677 daily trips (assumed in the Waterfront cumulative analysis), down to 797 daily trips. After this applicant proposed modifications, the City Council further reduced the residential component of the Legado project by an additional 31 units.

favor of utilizing a surface parking lot with an entrance located approximately 300 feet south of the Shade Hotel parcel. However, this modification would not double the traffic associated with the Shade Hotel as suggested by the commenter; this modification was approved by Addendum to the original MND, which concluded that the modifications "would not create any additional traffic impacts." Furthermore, there are no intervening intersections between the Shade Hotel and the new surface parking facility, consequently the slight change in parking locations with not alter the traffic analysis. The City Hermosa Beach released an NOP for its 2040 General Plan contemporaneously with the Waterfront Draft EIR (and well after the City of Redondo Beach began its Waterfront environmental review process in 2013). The City of Hermosa released a Draft of Plan Hermosa for public review in December 2015. The plan emphasizes urban design and pedestrian and bicycle connectivity in its land use and mobility goals. It does not indicate whether the resulting changes in population, households, and jobs associated with the land use change, is the similar to the changes accounted for in the City in the SCAG 2012 RTP/SCS. These data would be included in the Draft EIR, which has not been released. However, based on the policy framework outlined in the Plan, the land use changes are unlikely to substantially increase population and jobs beyond what is accounted for in the City in the SCAG model, and because the mobility strategies of Plan Hermosa would emphasize non-auto travel modes, it is anticipated that the General Plan would not result in traffic growth beyond what is already accounted for in the growth rate applied to the cumulative analysis. The General Plan also does not specifically identify the locations of potential growth, not identified those parcels that are likely to be redeveloped,[48] furthermore, the Hermosa General Plan has a proposed horizon year ending 21 years after completion of the Waterfront project and will be subject to its own CEQA environmental review and cumulative analysis.[49] As noted above, the City utilized highly conservative cumulative assumptions, and the adoption/implementation of any amendments to the Hermosa General Plan will not occur until well after completion of the Waterfront Project. The assisted living facility referenced in the comment is the Kensington Assisted Living Facility; this was incorporated into the analysis. Information regarding the Sketchers Headquarters Project had not yet been released at the time of the Notice of Preparation (additionally at the time of preparation of this Final EIR, an initial study/notice of preparation had not been released). The Sketchers Project is not nearby the Waterfront project (it is located approximately 2.4 miles northeast of the project site), furthermore the draft application materials dated March 2016 explain that modifications are designed to address existing overcrowding from their existing facility, and that modifications are "only designed to house an additional 8 people." Given the distance and the nature of these modifications, this project would not affect the Waterfront cumulative analysis. For example, the ITE trip generation rate for office employees of a general office building is 0.46 PM peak hour trips per employee (resulting in approximately four additional trips associated with these additional employees spread out along roadways near that facility).[50]

Regarding the "upcoming lease renewal for King Harbor Marina," the City and the master leaseholder have been discussing the lease conditions; however, as negotiations are still ongoing, no changes to existing operations are known. In addition, changes to operations associated with the lease renewal for King Harbor Marina is speculative and outside of the Notice of Preparation of the Waterfront project EIR.

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48 The likelihood a site will be redeveloped depends upon a number of factors, including the intent of individual property owners, businesses, and citizens, birth rates and death rates, and existing infrastructure constraints.

49 While the comment relies upon a preliminary figure discussing residential and non-residential "capacity." Capacity does not equate to reasonably foreseeable growth. (*Sierra Club v. County of Tehama* 2012 WL 5987582 [Upholding General Plan EIR which utilized "population growth statistics and projections provided by the [Department of Finance]" noting that a "[theoretical buildout] projection is purely a unit per acre calculation and does not reduce units because of environmental, infrastructural or other types of constraints that would limit the number of units on a parcel."; *Ross v. California Coastal Commission* (2011)) 199 Cal.App.4th 900 ["No provision of law required the commission to speculate on the environmental impacts of the two previously tied parcels or on lots that could be created in the future through purchase of developed adjoining properties that could be merged and subdivided."]

50 *Trip Generation, 9th Edition*, Institute of Transportation Engineers, 2012.

As noted above, the EIR also included a conservative growth projection, so the specific development proposals and/or modifications referenced in the letter are well within the assumed growth rates.

As for the considerations for the AES Power Plant Site and Measure B relative to the Waterfront Draft EIR, please refer to Master Response #1: AES Power Plant Site. The commenter's suggestion to use Measure B (which was rejected by the voters), as "the upper limit of impact assessment of repurposing of the AES property" is directly contrary to suggestions made by the commenter in 2007 after a referendum rescinded approval of the Heart of the City Zoning for the AES Site. The commenter (Mr. Light) stated in an email dated March 25, 2007 "The HOC EIR assumed the power plant was replaced by condominiums and commercial uses. Under the proposed zoning change, the powerplant will continue in operation without any modification. The environmental impacts must be reanalyzed in light of the real conditions existing currently at the power plant."

The commenter also makes general assertions related to the Public Records Act and the "DEIR consultant contract" related to cumulative analysis of the AES site associated with Measure B. These issues are outside the scope of CEQA. Nevertheless, the City notes that contract for the Draft EIR consultants expressly states "the City in its sole discretion may, upon notice to Consultant, delete certain items or services set forth in Exhibit 'A" [listing the proposed tasks for the Draft EIR consultant]." (Nov. 19, 2013 Agreement for Consultant Services Between the City of Redondo Beach and CDM Smith Inc., General Provisions, Section 3.) When Measure B was rejected by the electorate eight months before release of the Waterfront Draft EIR, the City orally informed its consultants that a cumulative analysis of Measure B was not needed. As noted in the City's PRA response "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."

Comment PC323-39

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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.***

Response to Comment PC323-39

Please refer to Master Response #9: Views and Scale of Development regarding the selection of the Key Observation Views and the adequacy of the view analysis presented in the Draft EIR.

While the precise location of the photograph presented in Figure 3 shown above in Comment PC323-41 is not identified by the commenter, it appears to be taken at a similar angle as Key Observation View 4 (Figure 3.1-5b in Section 3.1, Aesthetics and Visual Resources of the Draft EIR). However, it should be noted that the Figure 3 in the comment letter appears to be taken at a focal length that does not represent a naked-eye view (i.e., the camera lens appears cropped and "zoomed in" as evidenced by the pixelization and the atypical ultrawide aspect ratio). Furthermore, the photograph also appears to be taken from a location internal to the project site such that the photograph shown a closer-up view of the Santa Monica Bay and does not accurately represent the view from Harbor Drive. Figure 3.1-5b in Section 3.1, Aesthetics and Visual Resources of the Draft EIR is taken from the cycle track along Harbor Drive and was taken with a 21 mm camera lens to mimic the human field of view, and not "zoomed in" as provided in the comment; therefore the Draft EIR provides a more accurate representation of the view from Harbor Drive. As shown in Figure 3.1-5b and described in Section 3.1, views of the Santa Monica Bay are available from Harbor Drive, but at a distance which limits the visual quality. Master Response #9: Views and Scale of Development, also provides several additional existing views from along Harbor Drive. This includes Viewpoints E and F, which appear to be in the general vicinity of the photograph from the comment.

Comment PC323-40

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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 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.

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.
[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC323-40

Please refer to Master Response #9: Views and Scale of Development regarding views along Harbor Drive and building massing. Please see Section 1 of Master Response #9 for discussion of views from Harbor Drive. The commenter's references to a "huge, unbroken, three story parking structure…[and] megalithic buildings" appear to be a reference to visual character rather than views; please see Section 2 of Master Response #9.

s for shadows, Tthe effect of shadows on land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Depending on the position of the sun relative to the earth's rotation, shadows cast by a structure are projected east or west of true north according to the time of day and the season. The Los Angeles area is at 34 degrees latitude, so all shadow lengths are measured for this degree latitude. Because shadows are only cast in a west to north to east direction, only uses in those directions from a structure are subject to shadows. The only land uses located in proximity to the project site that could include facilities or uses sensitive to shadows are outdoor spaces associated with residential uses. The tallest structure on the project site is 45 feet tall (the new parking structure), and that the proposed project is not anticipated to shade any of the surrounding land uses (given the nearest building is at a distance of approximately 112 feet to the east), for any large portion of the day. The nearest building, the adjacent hotel to the east of the northern portion of the project site, would be shaded only in the late afternoon. There are no residential (shade sensitive) uses within the vicinity of the new parking structure and the other structures at the project site would be not as tall and are further within the project site. Because no shade sensitive uses would be exposed to permanent shading, shading would be less than significant. As for pedestrian-oriented outdoor spaces or restaurants with outdoor seating areas, these would be within the project site and future uses/users. CEQA does not generally require an agency to consider the effects of the proposed project on the project or its site. Of all the proposed development at the project site, the proposed 45-foot tall, three-level parking structure in the northern portion of the project site would cast the largest shadow.

Comment PC323-41

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.

Response to Comment PC323-41

The view of the proposed project at the intersection of Harbor Drive and Portofino Way (Figure 3.1-17 in Section 3.1, Aesthetics and Visual Resources of the Draft EIR) is one of several renderings included in the Draft EIR. As described in Section 3.1.4.1.2, these renderings were considered in the analysis of the proposed project's visual character/ visual quality and local valued views, and were used to assess the broad changes that would occur with implementation of the proposed project. Existing Conditions along Harbor Drive were discussed on Draft EIR Section 3.1, Aesthetics and Visual Resources, page 3.1-27:

> …the northern portion of the project, located west of Harbor Drive, has large paved surface parking lots and stand-alone buildings dispersed throughout the site. Limited background views of the

> water are available, albeit partially obscured by intervening landscaping (e.g., palm trees), buildings, and other features (e.g., light poles, signage, and splash wall, parked vehicles). The overall quality of the view from Harbor Drive is limited by prominence of large expanses of asphalt in the foreground. Further, given a limited difference in elevation between Harbor Drive and a distance 0.8 to 0.14 mile from the street to the water, the availability of water views is limited.

As further discussed in Draft EIR Section 3.1.2.3.4; the viewpoints that were selected were determined to be representative of other view locations in their proximity. In this case Views 4 and 5 are a conservative representation of view further north on Harbor Drive, given the increasing distance from the ocean at those locations. Nevertheless, an additional view from the intersection of Harbor Drive and Portofino Way has been added to the Final EIR (see Master Response #9: Views and Scale of Development, Viewpoint A). Please see Response to Comment PC323-43 regarding Figure 5 in the comment letter.

Comment PC323-42

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.

Response to Comment PC323-42

The views of the water from Harbor Drive and changes that would occur under the proposed project area described in Section 3.1.4.5 (See North Harbor Drive – Key Observation Views 4 and 5 on page 3.1-44). As with other areas along Harbor Drive, while some distant and narrow views of the water are available, they are largely obscured by intervening structures (i.e., arbor and signage) and landscaping.

The rendering (bottom of Figure 5 of this comment letter and Draft EIR Figure 3.1-17) shows the proposed building at the northeast corner of the project site and as described in Section 3.1.4.1.2, and was one element considered in the analysis of the proposed project's visual character/visual quality and views. The Draft EIR analysis of visual character notes that the existing conditions would be altered by the presence of new buildings, including structures two to three stories tall, as well as structures at seaside lagoon. (See Draft EIR starting on page 3.1-50.)

However, it should be noted that the new accessory buildings at Seaside Lagoon would not be visible from this vantage (bottom of Figure 5 of this comment letter and Draft EIR Figure 3.1-17) as they would be located behind the structure that is depicted and thus obscured from view. The only possible view of the Seaside Lagoon in from the right bottom portion on the rendering (trees in the distance of rendering at bottom of Figure 5 and Draft EIR Figure 3.1-17), which is the view corridor between the accessory buildings and the existing restroom building. As Figure 3.1-17 is a rendering, the existing restroom building, which would remain under the proposed project, is not depicted and may be visible from this location at the right side of the view depicted in the rendering.

It should also be noted that views of coastal resources from locations within the Seaside Lagoon are not currently available to the public, as the subject area is currently operated as a private facility that is open only during certain times of the year. With implementation of the proposed project, the subject area would be open to the public year round, with views of coastal resources available from therein.

Comment PC323-43

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.

[For the figures included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]

Response to Comment PC323-43

For a discussion of building massing, see Master Response #9: Views and Scale of Development. It should be noted that the accuracy of the block depiction prepared by the commenter in Figure 5b cannot be ascertained. Further, based on current conceptual plans, the movie theater would be located west of the parking structure and would not be visible from this location. It should also be noted that while the description of Figure 5c indicates that "Harbor mouth, ocean, cliffs of PV are all in view," those visual aspects are, for the most part, barely visible and are obscured by the existing surface parking lot and existing buildings and ornamental landscaping that dominate the viewshed.

Regarding views along Harbor Drive, the Draft EIR provides an evaluation of the change in views from Harbor Drive in Section 3.1.4.5 (See North Harbor Drive – Key Observation Views 4 and 5 on page 3.1-40) and determines that while views of the water would decrease along the Harbor Drive, new views would be provided along the Pacific Avenue Reconnection and new main street and thus impacts would be less than significant. Furthermore, the commenter's reference to the "experience of being 30 feet away from a 45 foot tall parking structure" implies the commenter is discussing visual character (Impact AES-2), rather than local-valued views (Impact AES-1). Analysis of Visual Character/Visual Quality is also more nuanced than just a block massing analysis utilized in the comment letter. Please see Draft EIR Section 3.1.2.1.1 and the Impact Analysis for AES-2 for additional details. As described further in Response to Comment PC323-50 below, the HOC EIR reached a similar conclusion regarding impacts along Harbor Drive.

Comment PC323-44

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.

Response to Comment PC323-44

Please refer to Master Response #9: Views and Scale of Development regarding the selection of Key Observation views and see Response to Comment PC323-45 below for additional discussion of views from Czuleger Park.

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

Comment PC323-45

[For the photos/figures included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC323-45

From the views presented in the photographs above, which are generally consistent with information presented on Figure 3.1-5a of the Draft EIR and associated description on page 3.1-24 of the Draft EIR, some development in the northern portion of the project site (including the proposed market hall) and the pedestrian bridge would be visible. However, much of the view of the ocean in the left side of the photographs is looking across Basin 3, which would not change under the proposed project. Therefore, views of the ocean and horizon would remain available, and the impact would not be significant, as previously concluded in the discussion on page 3.1-42 of the Draft EIR. Please refer to Master Response #9: Views and Scale of Development regarding the selection of Key Observation Views.

Comment PC323-46

The next image shows that the City has named this path a "Redondo City Walk". As such substantive view impacts would be significant. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

Response to Comment PC323-46

The photograph shows a sign along the Pier/Veterans Park Trail, one of four designed Beach Cities Health District scenic walking trails, as described in Section 3.12.2.2 in Section 3.12, Recreation of the Draft EIR. The trail is identified as a wheelchair accessible trail that extends along the Horseshoe Pier and through Veterans Park overlooking the Pacific Ocean[51]. The comment states that a significant view impact would occur because this is a City designated walk, but does not provide any substantial evidence for this conclusion.

It should be noted that under the proposed project, some portions of the walk would be modified from existing conditions within the project site; however, the walk would continue to be available and be wheelchair accessible. Further, as described in Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Response to Comments PC323-45 above and PC323-47 below, views of the Horseshoe Pier and ocean would continue to be available from Czuleger Park and other locations in the vicinity of the project site. Therefore, no significant impact to the walking trail would occur.

Comment PC323-47

And here is an image from the bottom of the park, overlooking the harbor. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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. *[For the figures included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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) *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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

[51] Redondo Beach Chamber of Commerce and Visitors Bureau, 2013 Redondo Beach Chamber of Commerce and Visitors Bureau. 2013. 2012-2013 Redondo Beach, The Guide. Available online at: http://digital.publicationprinters.com/publication/?i=120125&p=70

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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.

Response to Comment PC323-47

As described in Master Response #9: Views and Scale of Development, the analysis of views from Czuleger Park considered the three views specifically called out as designated as protected views in the 1975 settlement agreement. The commenter is correct that the market hall would be more visible from the lower elevation of the park. However, while the market hall would be more visible from the lower elevation of the park, views of the ocean would remain available immediately to the north and south of the market hall. Therefore, as discussed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, valued views of the ocean would remain available from Czuleger Park.

It should be noted that the view depicted in Figure 9 (Figure III.N-6 from the HOC Final EIR) does not provide an accurate representation of the currently proposed Waterfront project. The HOC structure depicted in Figure 9 consists of a fully two-story building with higher tower elements, but the proposed Waterfront building is principally one-story with a small two-story element (the second story occurs over approximately 1/3 of the proposed Market Hall building). The HOC structure depicted in Figure 9 in the comment is located to the north and east of the proposed market hall. From this elevation and angle, the proposed building would be located further to the left of the viewshed and partially obscured by the topography, landscaping and existing buildings. Under the proposed project, in addition to a portion of the market hall, a mix of one- and two-story buildings and north of the market hall are likely to be visible from this location, which would provide a more varied view with less massing that depicted in Figure 9. Additionally, views of the ocean and horizon are available beyond the one- and two-story buildings.

Comment PC323-48

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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) *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

Response to Comment PC323-48

Please see Response to Comment PC323-97 regarding bicycle safety. Please see Response to Comment PC333-16 for discussion of views from the bicycle path. In particular, as shown in Figure 2-18 of the Draft EIR (specifically Sections 'A' and 'B' cross sections), much of the proposed bicycle path is at a higher elevation than the Pacific Avenue Reconnection roadway, providing an improvement in comparison to existing conditions. As discussed therein, the commenter ignores numerous improvements to the existing bicycle path in comparison to existing conditions; furthermore, the proposed project includes a newly proposed bicycle path directly adjacent to the water's edge. (Draft EIR Figure 2-19.) As also discussed in Response to Comment PC333-16, Figure 10 in the comment letter is not a representative/accurate view associated with the existing bicycle path. The commenter also asserts that development blocks 80 percent of the views from Harbor Drive; for discussion of this issue, please see Master Response #9: Views and Scale of Development.

Comment PC323-49

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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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.

Response to Comment PC323-49

CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392.) Furthermore, should the Sportfishing Pier not be replaced, the views from the pier would no longer be available. However, the views from the shoreline at that location would remain from the shoreline (i.e., the mouth of the harbor, North Breakwater, Santa Monica Bay and Palos Verdes Peninsula would continue to be visible. Views of bay extending over the water would also continue to be available from the Horseshoe Pier and the Pedestrian/Bicycle Bridge. Therefore, view impacts from removing the Sportfishing Pier would be less than significant.

Regarding bicycling on the boardwalk, see Response to Comment PC323-97. While 12-feet in width is the minimum width allowed under the code, the boardwalk/bicycle path would generally be approximately 20 to 30 feet in width, which is anticipated to accommodate mixed flow under typical conditions. As part of its normal operations, the City would determine if any bicycle controls are needed, such as designating hours/times when bicycles should be walked instead of ridden in certain areas during periods of high activity, as allowed under Section 12-2-07 of the RBMC. Thus, while it is possible some limitations on bicycle use would be implemented as needed along the boardwalk, the bicycle path along the eastern edge of the project site would remain available, providing a continuous route across the project site at all times.

Comment PC323-50

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.N)	Due to increased waterfront development, the proposed project will block views, particularly from the Seascape Condominiums. Views from Herondo 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.

Response to Comment PC323-50

As discussed in Response to Comment PC323-28 above, the HOC EIR was a Master EIR and Program EIR certified in 2002 that analyzed environmental impacts associated with a much larger study area and assessed impacts associated with a much greater level of development and wider array of uses. Furthermore, experts can disagree; such a disagreement does not make an EIR inadequate. (CEQA Guidelines Section 15151.)

The significant impact on scenic views identified by the HOC EIR pertains to views from Seascape Condominiums (i.e., private views) as specified on page III-187 of the Final EIR. Furthermore, CEQA has been clarified since that time. (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477. [Noting that "Under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons."].) The Waterfront EIR assessed impacts associated with "local valued view available to the general public." As described on page 3.1-42 and shown in Figure 3.1-7 in Section 3.1.4.5 in Section 3.1, Aesthetics and Visual Resources of the Waterfront Draft EIR, public views of the ocean from the designated view points in Czuleger Park would remain available and therefore the impact would be less than significant. Please also see Master Response #9: View and Scale of Development.

It should be noted that the HOC EIR mitigation measure referenced in Comment PC323-50 referenced above that states:

> 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.

This measure referenced from the HOC EIR is already contained in the current development regulations that the proposed project must comply with. Please see Section 3.9, Land Use and Planning of the Draft EIR (see Table 3.9-8 Project Consistency with Coastal Zoning Uses and Key Development Standards on page 3.9-58 and Table 3.9-10 Consistency with the Harbor/Civic Center Specific Plan on page 3.9-69.)

As described in Section 3.9, the proposed project would comply with height limitations set forth in the Coastal Zoning, which limits the development of two-story structures in portions of the northern portion of the project site consistent with the mitigation listed above. Further, the market hall, which is the building that would be the most visible from Czuleger Park would have a varied roof line with one- and two-story elements, and while from some locations and angles within Czuleger Park, would reduce views of the water, it would not fully obstruct views or create a "wall-like" impact. Therefore, the impact would be less than significant.

Comment PC323-51

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.

Response to Comment PC323-51

Regarding parking for boaters, please see Master Response #7: Waterfront Parking. Regarding views, the comment is incorrect that Draft EIR addresses reduction of views as an aesthetic improvement. Please also see Master Response #9: View and Scale of Development. As also discussed in the April 8, 2008 Administrative Report prepared for the City Council public hearing on the zoning for the project site: "Clustered new development in conjunction with replacing surface parking with parking structures will in fact increase the amount of useable open space, provide pedestrian walkways and view corridors in place of walking through parking lots, and enhance the character of the Harbor area as a pedestrian-active area." (April 8, 2008 Administrative Report, page 26.)

Regarding the maintenance of the facilities, the commenter's opinion is noted and your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body. Please also see Response to Comment PC323-2 for discussion of ongoing maintenance/studies. Furthermore, in Comment PC323-53, the commenter acknowledges that the City and the Harbor area include at least 26 ongoing maintenance activities, including "Replacement a*nd maintenance of Monstad Pier pilings*."

Comment PC323-52

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) [For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

Response to Comment PC323-52

Please see Section 3.1, Aesthetics and Visual Resources of the Draft EIR regarding the thresholds and methodology that were used to address visual character impacts, which include a number of factors which are not addressed in the comment, and see Response to Comment PC323-82 below regarding selection of thresholds used in the Draft EIR.

Please also see Master Response #9: View and Scale of Development regarding massing and development along Harbor Drive.

Regarding the amount of square footage being built on the project site, see Response to Comment PC323-54 and to the extent the commenter is asking a question regarding compliance with the City's development standards, please see the City's official Record of Interpretation included in Section 3.3 of Chapter 3, Modifications to the Draft EIR of the Final EIR for further details. The commenter also provides a "Harbor Section Growth Assessment." It is unclear how the commenter has defined the "Harbor Section;" however, it should be noted that this summary does not accurately reflect existing conditions on the project site or for the totality of the proposed Waterfront project. (Please see Draft EIR Table 2-1.) The square footage of the existing Pier Parking Structure is 495,000. The commenter does not appear to consider the current massing of the southern portion of the project site related to the area of the Pier Parking Structure. As described in Chapter 2, Project Description of the Draft EIR, the southern portion of the project site currently includes the Pier Parking Structure, which consists of three levels with the upper level including uncovered parking stalls and the two-level Pier Plaza development. (Refer to Photograph 2-13 of Chapter 2 for a picture of the parking structure and Pier Plaza.) In addition, the residential community immediately east of the project site is situated on a bluff and consists of several three and four story towers. These structures are much taller than the existing Pier Parking Structure/Pier Plaza, as well as much taller than the proposed development.

The commenter states that approximately 85 percent of the area along the eastern boundary of the project site is occupied by building area. As an initial matter, these types of calculations ignore existing conditions which constitute the baseline for comparison, and ignore the aesthetics methodology and criteria utilized in the EIR, which address a number of factors for visual character and views. The measurements cited are presumably estimates based on conceptual plan provided in the Draft EIR and the building dimensions presented by the commenter are somewhat greater than the measured plan dimensions. Further, while the commenter does state that Torrance Circle is not included in the measurements, the measurement also appears to omit approximately 200 feet of the Pacific Avenue Reconnection that extends from southern edge of the hotel/retail/parking structure to the intersection with Torrance Circle. Additionally, the calculations fail to account for the fact that the market hall and a portion of the hotel/retail/parking structure are set back from the project boundary and west of Basin 3.

Based on a frontage length of 2,684 feet (from the northeastern edge of the project site at Portofino Way/Harbor Drive to the intersection of the Pacific Avenue Reconnection and Torrance Circle, there is approximately 1,584 feet of development adjacent to Harbor Drive and the Pacific Avenue Reconnection. This constitutes approximately 60 percent of the length of the project site (the linear measurement along Harbor Drive, not including Torrance Circle). There is development proposed within the project site that is not included in the 60 percent calculation. This proposed development is set back 125 feet or more from the eastern edge of the project site and does not overlap with development along the eastern boundary. This includes a portion of the market hall, hotel/retail/parking development and portions of other small retail/restaurant buildings. These building are setback from Harbor Drive and Pacific Avenue Reconnection and interspersed with the view corridors and the Redondo Beach Marina/Basin 3 and thus, does not constitute a "wall of development" as asserted by the commenter.

As clarification, the theater is not located along Harbor Drive, but is instead located west of the northern parking structure (shown as Building B on the conceptual plan [see Figure 2-10 in Chapter 2, Project Description of the Draft EIR]). The commenter appears to be referencing a retail/restaurant building south the northern parking structure as the theater (shown as Building D on the conceptual plan [see Figure 2-10 in Chapter 2, Project Description of the Draft EIR]).

Comment PC323-53

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.

Response to Comment PC323-53

The comment does not address an environmental issue. However, your opinion on the proposed project is noted and your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body. While the commenter asserts that the current development constitutes "overdevelopment," in 2008 the commenter (Mr. Light) submitted an email which stated "I applaud your compromise on the development cap on the pier and harbor rezoning. It resolves the compliance issues and provides a stable environment with reasonable growth for developers to make investment decisions." Coastal Commission staff responded to allegations that 400,000 square feet of new floor area constituted excessive development and noted in its staff report "This low FAR [Floor area ratio] coupled with incentive bonuses for additional open space will significantly limit the massing of structures and provide open space within the Harbor/Pier area." (Coastal Commission Admin Report & Addendum for July 9, 2009 hearing, Item Th11a, page 17.)

Comment PC323-54

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.***

Response to Comment PC323-54

Figure 15 in Comment PC323-54 includes the following incorrect information:

(1) parking structure square footage is not included in the 400,000 square foot development cap (see Response to Comment PC323-55 below);

(2) as described in the text of the comment, the 13,945 "Octagon Building" on Parcel 10 is not included in the calculation as "existing square footage" in terms of the 400,000 square foot development cap calculation;

(3) the existing and proposed square footage numbers need to be adjusted to remove square footage in the P-PRO zoning district from the 400,000 square foot development cap calculation. This was included in the Draft EIR, and has been corrected in the Final EIR (see Chapter 3, Modifications to the Draft EIR of the Final EIR).

Based on the adjusted amount of net new square footage to which the development cap applies, the amount of net new square footage is 277,901 square feet. Therefore, contrary to the assertion in Comment PC323-54, the proposed development in the CC zones, is within the development cap of 400,000 square feet. To the extent the commenter is asking a question regarding compliance with the City's development standards, please see the City's official Record of Interpretation included in Section 3.3 of Chapter 3, Modifications to the Draft EIR of the Final EIR for further details.

Per the October 8, 2012 Harbor Commission report, the Harbor Patrol Facility resulted in a net increase of 2,702 square feet and the Shade Hotel a net increase of 34,309 square feet. There is no intention or requirement to demolish the "Old Harbor Master Facility" and the square footage of that facility was counted as an increased credit under the City's cumulative development cap. Following is the excerpts from the October 8, 2012 report:

> 'That the RBMC Sections 10-5.813(a), 10-5.814(a), 10-5.815(a), 10-5.816(a), state that "cumulative development in all CC coastal commercial zones shall not exceed a net increase of 400,000 square feet of floor area based on existing land use on April 22, 2008." The Harbor Commission finds that the Shade Hotel Project would provide a gross floor area of 47,520 square feet, which would replace the existing 13,211 square foot restaurant and related facilities on the project site (constructed before April 22, 2008). The Harbor Commission further finds that the project will result in a net increase of 34,309 square feet of development in the CC Coastal commercial zones. The Harbor Commission further finds that this allows for an additional 362,989 square feet of development in the CC coastal commercial zones after accounting for the net construction of 2,702 square feet for the Harbor Patrol Facility currently under construction. These findings are not intended to limit development (in the event that these municipal code/coastal zoning ordinance sections are revised), but rather to catalogue increases in gross floor area that fall under these municipal code sections."

Comment PC323-55

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 * 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."

Chris Cagle - Former City Councilman, Dist 2
"I am in favor of Measure G because it concludes a 10 year discussion on this issue and incorporates most everything the public had been asking for, including limits on overall development potential and restrictions on certain uses like prohibiting new residential in the harbor area and at the power plant. But, it allows for revitalization and solves many important legal and inconsistency issues in the zoning laws for that area, which have been an problem for many years."

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.

Response to Comment PC323-55

The City's cumulative development cap does not consider/regulate parking facilities. Please see the City's official Record of Interpretation included in Section 3.3 of Chapter 3 of the Final EIR for further details. In addition, please refer to Master Response #7: Waterfront Parking regarding changes in the area associated with parking at the project site.

Comment PC323-56

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 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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

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]

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.

[2] Heart of the City Final EIR, page III-156
[3] HOC Final EIR, page III-168
[4] HOC Final EIR, page III-170
[5] HOC Final EIR, page III-172b

Response to Comment PC323-56

As described in Response to Comment PC323-28, the HOC EIR was a Master Plan and Program EIR certified in 2002 that addressed a project with greater intensity and different uses and project elements from the proposed project. Furthermore, the planning concepts contained in the Heart of the City Specific Plan (i.e., expansion of the Seaside Lagoon park into Joe's Crab Shack leasehold) and discussed in the HOC EIR, were subject to a referendum and rescinded. The Zoning for Joe's Crab Shack in Measure G was approved as CC-4 zoning, not P-PRO zoning.

The Initial Study determined that the zone change and general plan amendments were generally within the scope of, the certified HOC EIR, although scaled down from the project assessed in the EIR. Further, the Initial Study assessed a zone change and general plan amendment that would have allowed a greater amount of development than was ultimately approved and enacted. Therefore, while it was determined through a subsequent Initial Study that the HOC EIR addressed the adoption of the current zoning regulations, the impacts and mitigation measures identified in HOC EIR were based on different development intensities, a different study area, and a mix of uses as compared to the proposed project. The HOC project also included the addition of 2,998 new residential units and an associated population increase of 6,626 people.

Unlike the project assessed in the HOC EIR, the proposed project would not alter the existing parkland ratio within the City, nor would it result in the removal of Moonstone Park; therefore the significant impact identified in the HOC EIR is not applicable to the proposed project. As described in Section 3.12, Recreation of the Draft EIR, the proposed project would not result in a significant impact on recreational resources and no mitigation is required. Please also see Master Response #4: Modifications to the Seaside Lagoon.

To the extent the commenter is referencing General Plan consistency; please see Draft EIR Section 3.9.4.1 which notes that General Plan consistency is based upon review of the General Plan as a whole, and that Courts have recognized that general and specific plans attempt to balance a range of competing interests. Furthermore, in this case, this language is not drafted as a mandatory policy, and expressly notes that the City will "Consider expanding…"

The commenter incorrectly assumes that "expansion" only references physical expansion of the zone boundaries. However, the City's General Plan Recreation element expressly notes that "expansion" of the Lagoon can include a number of concepts, including "Improve wayfinding and entrance to park," "Evaluate expanding hours of operation," "improve quality of concession facility," "install secure and permanent storage areas," and "evaluate additional off-season events." (Redondo Beach Recreation Element page 3-170.) Consistent with these concepts, the proposed Waterfront project provides a number of benefits to the lagoons operations, including but not limited to: 1) the proposed project would allow the lagoon to be open year round (rather than only during the summer months under existing conditions); 2) the proposed project would eliminate the physical fencing and barriers that separate the lagoon from the rest of the Harbor; 3) the lagoon would no longer require a fee to access the facility (as occurs under existing conditions); 4) individuals will be able to access the lagoon to launch paddle board and kayaks (which is not available under existing conditions); 5) the

proposed project would provide improved pedestrian and bicycle access to the lagoon; and 6) the proposed project would provide improved concession and accessory uses (such as recreational sales/ rentals). While the comment suggests in this and subsequent comments that any new structures are inconsistent with policies for expansion, such a reading is inconsistent with the City's planning documents, which expressly allow a Floor to Area Ratio of 0.25 and therefore development of new structures.

Comment PC323-57

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]
[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]

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 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]

[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

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

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

Response to Comment PC323-57

Comment PC323-57 provides general information and implies that the proposed project is not consistent with the General Plan Recreation and Park Element. The commenter also states the " … city has gained residents while decreasing park space." In fact, the City has added new parks and open space including the Harbor-Herondo Gateway park.

To the extent the commenter is discussing the Draft EIR environmental analysis, it is not the purpose of CEQA to fix existing environmental problems. (CEQA Guidelines Section 15126.2(a); *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1094 ["The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope"]. Please also see Response to Comment PC323-56.

The commenter has submitted similar comments on other projects; the City has previously prepared and adopted similar responses which explained:

> The commenter also suggests that the City has set a standard of 3 acres of park space per 1,000 residents. The commenter appears to be referencing language from the Recreation Element related to the "list of the community's recreation-related needs." This language, however, must be read in context with the rest of the Recreation Element which states "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." As discussed above, the project [1914-1926 South PCH Mixed Use Project] is incorporating 9,500 square feet of public open space, which include seating areas, water features, and fire pits.[52]

As discussed above, the Recreation Element expressly contemplates other types of recreational resources. The proposed project does not include any residential uses or change in amount of land zoned as P-PRO Parks Recreation and Open Space within the project area (i.e., Seaside Lagoon zone would remain the same [see Master Response #4: Modifications to the Seaside Lagoon]). Therefore, the proposed project would not alter the existing ratio of parkland from existing conditions. Additionally, as described in Section 3.12, Recreation of the Draft EIR, consistent with Policy 8.2a cited above, the proposed project would maintain and enhance existing recreation resources, maximize recreation opportunities, improve accessibility to the harbor area, provide view corridors to harbor from the surrounding area, restore a sense of place in the Coastal Zone, and enhance links to the harbor with existing facilities and activity centers. The proposed project would also provide a missing link of the California Coastal Trail. Supplements to the existing recreational resources include providing a new boat launch ramp, improved bicycle and pedestrian pathways and connections to the water (including the pedestrian/bicycle bridge), and providing a direct connection to the Harbor by modifying

[52] 1914-1926 South PCH Mixed Use project, Final Mitigated Negative Declaration, Response 5.4.

Seaside Lagoon.

Policy 8.2a.4 lists suggestions (i.e., items to consider) for enhancing Seaside Lagoon. As described in Section 3.12 and Master Response #4: Modifications to the Seaside Lagoon, the size of the park zone would not change; however, consistent with the intent to enhance the lagoon, the proposed modifications would include improvements to increase the visibility and accessibility of site. For example, the modifications would increase the public access to the park by removing the chain link fence, admission fee, and the limitations of days and hours of operation. Additionally, the modifications would provide a direct connection with the harbor, as well as make it central feature of the new waterfront development.

Comment PC323-58

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

Response to Comment PC323-58

Comment PC323-58 states that the Seaside Lagoon is shrinking in size. However, under the proposed project, the area zoned for public park zone would not decrease and therefore, there would be no reduction in public park area. Further as described in Response to Comments PC323-59 and PC323-60 below, Master Response #4: Modifications to the Seaside Lagoon, and Section 3.9, Land Use and Planning of the Draft EIR, all uses proposed within the area zoned P-PRO would be consistent with zoning requirements.

Comment PC323-59

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.***

Response to Comment PC323-59

Pursuant to Redondo Beach Municipal Code (RBMC) Section 10-5.201(a) *General Rules For Applicability Of Zoning Regulations*, zoning regulations under RBMC Chapter 5 *Coastal Land Use Plan Implementing Ordinance* apply to all land within the Coastal Zone of the City of Redondo Beach except for public streets and rights-of-way, and to State or Federal agencies, where applicable. Therefore, inclusion of rights-of-way (i.e., the new main street) is allowed with a public park. Furthermore, one of the express concepts in the General Plan Recreation Element for Seaside Lagoon is to "Improve wayfinding and entrance to park." This is similar to other parks in the City, which have on-site parking, *access roads*, concessions, and other facilities such as community rooms. In fact, a number of comment letters on the Draft EIR were received regarding a need for pick up and drop off adjacent to the lagoon for visitors and equipment, in addition to access and parking

(including handicapped parking) close to the lagoon. Please see Master Response #4: Modifications to the Seaside Lagoon and Master Response #7: Waterfront Parking for details on parking and access to the Seaside Lagoon.

Furthermore, policies in the Coastal Land Use Plan also states "provide continuous public access to and along the seaward side of the Piers and moles…Signs shall identify that vehicular access is available to the Moles and that public parking and coastal public amenities are located seaward of the signs." Similarly, the Coastal Zoning also states that the City shall "maximize public access to the beaches, parks and other recreation and open space areas within the coastal zone." (RBMC Section 10-5.1100(e).)

Comment PC323-60

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.***

Response to Comment PC323-60

As described in Response to Comment PC323-58 above and in Master Response #4: Modifications to the Seaside Lagoon, the proposed project does not alter the amount of land zoned as public parkland. Further, the proposed uses, including rights-of-way, parking and accessory uses are consistent with uses allowed under the Coastal Zoning and include support for the public park uses, including accessory uses such as marine recreation products and rentals (e.g., kayaks, paddle boards, wetsuits), beach club, maintenance, public safety, and concessions. The access road and parking stalls located within the park area provide park access. There would be provision for designated short-term loading and unloading available for park users to drop off coolers, paddleboards, or other recreational equipment at the park. These uses support the recreational use and as such are not considered as reducing the available park area (similar to other parks in the City, which have on-site parking, access roads, concessions and other uses such as community rooms).

Regarding the commenter's assertion that the "useable public open space expands and shrinks with the tide", the amount of water area within the park boundaries would vary with the tide; however, at low tide, the sand area increases and the other public park uses including pathways, seating and picnicking area, and concessions would remain the same. Further, the park area is currently confined by a chain link fence and only open during

the summer months during daytime hours. The proposed project expands the accessibility of the site to the public for year round all day use. Additionally, a central feature of the modifications is to remove a portion of the existing breakwall to connect the lagoon to harbor waters. This would increase access of recreational users to the harbor and would represent an improved connection with the coastal setting. Therefore, the usability of the park is maintained, and enhanced, and would not conflict with applicable land use planning documents (see also Section 3.9, Land Use and Planning of the Draft EIR).

Comment PC323-61

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.

[For the figures included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

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.

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

Response to Comment PC323-61

As the commenter notes Measure G did not modify the P-PRO zoning classification for Seaside Lagoon. Please see Response to Comments P323-59 and PC323-60 above, the proposed modifications are consistent with the P-PRO zoning and Response to Comments PC323-58 through PC323-60 above relative to consistency with land use planning documents. While this comment implies that parking is inconsistent with zoning, Comments PC323-59 and PC323-65 from the commenter expressly emphasize the importance of providing parking: "*Given the importance of Seaside Lagoon area as a public recreational facility, adequate nearby parking*

facilities to serve this area [Seaside Lagoon] should be preserved.") (Emphasis in the original.)

Comment PC323-62

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.

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."*

Response to Comment PC323-62

The commenter does not introduce new environmental information or directly challenges the information presented in the Draft EIR. However, the general information provided in the comment requires the following corrections and clarifications.

As discussed in Section 3.9, Land Use and Planning of the Draft EIR, implementation of Coastal Act policies is accomplished through the City's certified LCP, which was reviewed and approved by the California Coastal Commission and the voters of Redondo Beach (Measure G).

Seaside Lagoon is an enclosed chlorinated swimming facility that has no direct water exchange with the Harbor. As described in Section 3.8, Hydrology and Water Quality, the source of the lagoon water is cooling water from the AES power generating station (AES Power Plant) that is then chlorinated prior to entering the lagoon. The water is dechlorinated prior to being discharged back into the harbor. No direct exchange with the harbor occurs, and the swimming facility does not require a site adjacent to the sea to function. Further, as described in Section 3.8 beginning on page 3.8-20, compliance with the required permitting requirements has been difficult and over the years the City has been put in the position of either (1) closing the facility; (2) spending significant capital resources to rehabilitate the facility and implement a contemporary water delivery and filtration system to eliminate discharge into the Harbor; or (3) working with the LARWQCB to modify the lagoon's NPDES Permit to allow for increased water discharge limits.

Comment PC323-63

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...."*

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

Response to Comment PC323-63

The purpose of the EIR is to analyze and disclose the physical environmental impacts associated with implementation of the project, not to provide a statutory consistency discussion. (Pub. Res. Code Sections 21002.1(a), 21060.5, 21068; CEQA Guidelines Sections 15126.2(a), 15382.)

Many of the subsequent comments allege inconsistencies with the Coastal Act's statutory provisions. The sections referenced by the commenter provide general policy guidance associated with the drafting and adoption process for Local Coastal Programs; this process was completed for the project site in 2010. (Pub. Res. Code Section 30200.) These standards were all considered during the preparation and adoption of the City's Local Coastal Program, which was certified by the Coastal Commission in 2010. More specifically, as part of that LCP certification process, on July 9, 2009 the Commission approved the City's proposed LCP, subject to the City's adoption of the Coastal Commission's suggested modifications. As noted in the Coastal Commission's Staff Report, the Coastal Commission's actions expressly included a finding that:

> "The Commission hereby certifies the Land Use Plan Amendment RDB-MAJ-2-08 for the City of Redondo Beach if modified as suggested and adopts the findings set forth below on the grounds that the Land Use Plan amendment with suggested modifications *will meet the requirements of and be in conformity with the policies of Chapter 3 of the Coastal Act.*"[53]

Shortly thereafter, the City adopted all of Coastal Commission's suggested modifications. On November 23, 2010, the Coastal Commission noted that "the Redondo Beach City Council adopted Resolutions 3050-10 and 1004-306, incorporating into the LCP the modifications suggested by the Commission pursuant to its approval of LCP Amendment 2-08, and submitted the modifications to the Executive Director for a determination that they are consistent with the Commission's action on July 9, 2009." The Coastal Commission and the Executive Director determined "that the City's action [in adopting the suggested modifications] is legally adequate."[54] Furthermore, Coastal Land Use Plans are components of the City's General Plan. (Pub. Res. Code Section 30108.5.) As discussed in *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, "general and specific plans attempt to balance a range of competing interests. It follows that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. An agency, therefore, has the discretion to approve a plan even though the plan is not consistent with all of a specific plan's policies. It is enough that the proposed project will be compatible with the objectives, policies, general land uses and programs specified in the applicable plan."

The City disagrees with the commenter's legal interpretation and conclusions, and also clarifies that 81,000 users of Seaside Lagoon refers to the annual total number of visitors to the site in 2015 (the site operated from May 23 to September 7 which encompasses 108 days). Based on the number of 81,328 visitors over the 108 day summer season, this is an average of 753 users a day. Regarding the alleged inconsistency of land uses, the proposed uses would be consistent with the Local Coastal Program (see Draft EIR Section 3.9), which was

[53] Coastal Commission July 9, 2009 Staff Report, Item Th11a (amendment #RDB-MAJ-2-08) available online at: http://documents.coastal.ca.gov/reports/2009/7/Th11a-7-2009.pdf. Minutes from this Coastal Commission Meeting are also available online and note that this item was "APPROVED WITH MODIFICATIONS": http://www.coastal.ca.gov/meetings/mtg-mm9-7.html.

[54] Coastal Commission December 2010 meeting Staff Report, Item W13a available online at: http://documents.coastal.ca.gov/reports/2010/12/W13a-12-2010.pdf. Minutes available online and note that the action was "APPROVED": http://www.coastal.ca.gov/meetings/mtg-mmx-12.html

approved by the City Council, the Redondo Beach electorate, and certified by the Coastal Commission as being in compliance with the Coastal Act. Please see Response to Comments PC323-58 through PC323-60 regarding Seaside Lagoon.

Comment PC323-64

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****. ..."*

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.

Response to Comment PC323-64

As described addressed in Response to Comment PC323-62 above, Seaside Lagoon is an enclosed chlorinated swimming facility. Although the swimming facility is adjacent to the Harbor, it does not need to be immediately adjacent to the Harbor to function. The connection of the facility to the Harbor is via pipelines for

the intact and discharge of saltwater. The proposed improvement to the facility would make the lagoon coastal-dependent because it would be open to and provide a direct connection to the Harbor. Refer to Master Response #4: Modification to the Seaside Lagoon regarding the size of the lagoon and recreational resources that would be provided.

Comment PC323-65

> **"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.***

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

Response to Comment PC323-65

Please see Response to Comments PC323-62 and 63 above regarding the California Coastal Act. Regarding parking adequacy and accessibility, see Master Response #7: Waterfront Parking.

The commenter's opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body. The commenter's reference to text from the Coastal Commission Staff

report is from an agenda item related to a Coastal Development Permit application to modify Kincaid's restaurant, and does not represent a statement of adopted LCP policy. As noted in the Coastal Commission staff report, this constituted "one of the suggested modifications to the City's certified LUP," however, this text is not included in the certified LCP. The City's certified parking regulations for the P-PRO zone are included in RBMC Sections 10-5.1117(f) and 10-5.1700 et seq.

Comment PC323-66

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

Response to Comment PC323-66

This comment summarizes Comments PC323-56 through PC323-65 above. Please see Response to Comments PC323-56 through PC323-65 above.

Comment PC323-67

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.

Response to Comment PC323-67

Please see responses to the following comments:

Regarding boat slips, see Response to Comment PC323-73

Regarding the Sportfishing Pier, see Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Regarding public parkland, see Master Response #4: Modifications to the Seaside Lagoon.

Regarding the pedestrian bridge, see Response to Comment PC323-96.

Regarding the boat ramp safety, Master Response #4: Modifications to the Seaside Lagoon and Master Response #8: Boat Ramp in King Harbor.

Regarding parking, see Master Response #7: Waterfront Parking.

Comment PC323-68

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) P****rovide 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.

Response to Comment PC323-68

The commenter asserts that the project is inconsistent with RBMC Section 10-5.800. This Section, which is titled "Specific purposes; CC coastal commercial zones," is not intended to be a set of regulatory controls on development, as assumed in the comment letter. Rather this section constitutes a set of guidance/concepts that identify the overall zoning objectives. As discussed under RBMC Section 10-5.200, there are "three (3) types of zoning regulations [which] control the use and development of property"; this does not include the section referenced in the comment. The development regulations referenced under RBMC Section 10-5.200 include (1) regulations which "specify land uses permitted or conditionally permitted in each zone" (e.g., RBMC Section 10-5.810), (2) regulations to "control the height, bulk, location, and appearance of structures on development sites" " (e.g., RBMC Section 10-5.812), and (3) Coastal Development Permit requirements (e.g., RBMC Section 10-5.2218). The concepts/guidance discussed under RBMC Section 10-5.800 are more akin to General Plan policy guidance. As discussed in Draft EIR Section 3.9.4.1 general and specific plans attempt to balance a range of competing interests. Similar rules also apply in the context of zoning. (See *Santa Clarita Organization for Planning the Environment v. City of Santa Clarita* (2011) 197 Cal.App.4th 1042, 1059-1064.) The consistency with applicable land use plans, including the Coastal Zoning regulations, is addressed in Section 3.9, Land Use and Planning of the Draft EIR. Regardless, the proposed is consistent with Coastal Zoning Section 10-5.800.

Furthermore the commenter has omitted RBMC Section 10-5.800(c) which lists the following as purpose of the CC zone:

> (c) Strengthen the city's economic base, and provide employment opportunities close to home for residents of the City.

As indicated by subsection c above and subsection b presented in Comment PC323-68 above, and the purpose of the CC zone is clearly is associated with the provision of both recreational and commercial opportunities related to the coastal setting. As described in Chapter 2, Project Description and Section 3.9, the proposed project includes elements to enhance both recreation and commercial uses to support the revitalization of the waterfront, consistent with the general purpose of the coastal commercial zoning district. Further, as shown on Table 3.9-8 in Section 3.9, the proposed project is consistent with the development regulations under the CC zoning that are established to meet the purpose set forth in Section 10-5.800. As outlined in Draft EIR Section 3.9, the proposed project is consistent with the permissible/conditional uses in the CC zones. As also discussed in Chapter 2 of the Draft EIR, one of the project objectives is to reduce seasonality, which has historically been a problem in the Harbor/Pier Area. As further discussed in the City Council's April 8, 2008 Administrative report for the project site's zoning, there is a "need for additional uses that provide enough day-time, year-round population to smooth out the seasonality of use and enhance the viability of shops and restaurants attractive to both residents and visitors." Consequently, while the commenter does not believe many of the proposed uses are coastal dependent, they are permissible under the zoning and have been incorporated to bolster and support the project as a whole, ensuring that it provides opportunities for the public throughout the year.

Comment PC323-69

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]

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

Response to Comment PC323-69

Please see Response to Comment PC323-56 for discussion of policies surrounding Seaside Lagoon in the Recreation Element. Please also see Response to Comments PC323-81 through PC323-99 regarding how the project maintains and enhances recreation. Accessibility to the coastal line is enhanced by improved bicycle and pedestrian connections and the Pacific Avenue Reconnection. Please see Response to Comments PC323-39 through PC323-50 regarding views. The proposed project includes a boat ramp that would increase recreational boating opportunities. Refer to Master Response #7: Waterfront Parking and Master Response #8: Boat Ramp in King Harbor regarding parking options and constraints. Please see Response to Comment PC323-73 regarding number of boat slips, and Response to Comment PC323-57 regarding expansion or visibility of Seaside Lagoon. It should be noted that Moonstone Park is not within the project boundary and therefore Policy 8.2a.3 is not applicable to the proposed project.

The full text of the Parks and Recreation Element Implementation Program relative to Seaside Lagoon is shown below:

> Evaluate the feasibility of implementing the following improvements, modifications, and other activities at Seaside Lagoon (Policy 8.2a.4):

- Provide a secure and permanent storage area to be available for instructors conducting classes and/or camps through the City's recreation program.
- Expand hours of operation and provide off-season events.
- Enhance the entry and visibility of Seaside Lagoon from North Harbor Drive.
- Expand land area of Seaside Lagoon.

As illustrated in the full text of Policy 8.2a.4, the implementation Program does not present requirements for the lagoon as the commenter indicates, but instead provides a list of items for evaluation consistent with Policy 8.2a.4. Please see Response to Comments to PC323-56 and PC323-57 regarding the proposed project's consistency with Policy 8.2a.4.

Comment PC323-70

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

[15] HOC Final EIR, page III-168

Response to Comment PC323-70

Please see Response to Comment PC323-28 regarding the applicability of the HOC EIR. The text referenced by the commenter from the HOC EIR discussed the contents of the previously proposed Heart of the City Specific Plan; this document and its associated policies were rescinded by referendum. For discussion of consistency with existing planning document, please see Draft EIR Section 3.9 and Response to Comment PC323-56 for discussion of policies surrounding Seaside Lagoon and the Recreation Element.

Comment PC323-71

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.

[16] Redondo Land Use Plan, page 6

Response to Comment PC323-71

Please see Table 3.9-5 in Section 3.9, Land Use and Planning of the Draft EIR, which addresses consistency of the proposed project with policies in the Coastal Land Use Plan, including Policies 1 and 2, select portions of which are cited in Comment PC323-71. As described in Table 3.9-5 of the Draft EIR relative to Policy 1, the proposed project is consistent because it maintains and supports or enhances boating and water recreation access, including through (1) the provision of a public boat launch ramp as required by Policy 1; (2) reconstruction/redevelopment of Redondo Beach Marina/Basin 3 (for both recreational and commercial vessels); (3) a modified Seaside Lagoon that provides direct access to the harbor and improved ocean viewing access; (4) improved vehicle and non-vehicle circulation throughout the site; and (5) new amenities throughout the site for enjoying the coastal setting such as benches and waterside picnicking/outdoor eating locations.

As described in Table 3.9-5 of the Draft EIR relative to Policy 2, buildings would be spaced such that view corridors would be provided from Harbor Drive and Czulegar Park, public views would also be available from public plazas, the boardwalk along the water’s edge, and the new main street. Further, the proposed project would include the demolition of most of the existing development within the project site to be replaced by new construction which would have a harmonious style and theme that fits within the character of waterfront as described in Section 3.1 Aesthetics and Visual Resources of the Draft EIR. Additionally, the proposed development is consistent with the development regulations set forth for the project site. Relative to parks and recreation, please Response to Comments PC323-81 through PC323-99. Relative to the amount of development on site, please see Response to Comments PC323-54, PC323-55, and PC323-68.

Comment PC323-72

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.

Response to Comment PC323-72

Please see Response to Comments PC323-62 and PC323-63 regarding consistency of the proposed project with the California Coastal Act. Please see Response to Comment PC323-64 regarding water-oriented recreational uses at the project site.

Regarding the commenter's assertion, that the harbor was created solely for water-oriented recreational activities, as described in Section 3.4, Cultural Resources of the Draft EIR, the vision for the harbor during the planning stages included leased development of "clubs, restaurants, motels and miscellaneous marine retail uses" on land near the harbor. It should be noted that historically a movie theater has been on the project site as early as 1912, with the Fox Theater being located at the site from 1929 to 1973. The harbor also included what is now called the International Boardwalk for the purpose of bring visitors close and enlivening the marina. It is also worth noting that at the time, development of Basin 3 was contentious because it eliminated part of the City's main business district, including historic buildings from the City's past including a railway station and ballroom that were located along the water's edge.

Comment PC323-73

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.

Response to Comment PC323-73

The significance thresholds in Draft EIR Section 3.12 determine whether the project would (1) "Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated," or (2) "Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment not already addressed as part of the proposed project." As described in detail in Draft EIR Section 3.12.4.3, the project would not result in a substantial physical deterioration of a park/recreational; facility and would not require the construction of any new off-site recreational facilities. Consequently, impacts were determined to be less than significant. However, "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." (CEQA Guidelines Section 15131.)

The slips being considered for the reconstructed marina would vary in size and range in number from 33-slips and eight side-ties (approximately 1,740 linear feet of space) to a maximum of 60-slips and eight side-ties (approximately 2,200 linear feet of space). As shown on Figure 2-16 in Chapter 2, Project Description of the Draft EIR, the marina option with fewer slips would have larger slips that accommodate larger vessels. Under this option, there would be one 24-foot slip and the remainder would vary from 30 feet in length to 65 feet in length. Under the marina option with a larger number of slips, 40 slips (approximately 67 percent) would be 22 feet in length, and the remainder would vary from 24 feet to 65 feet (each marina option also includes a side tie that is 100 feet in length to accommodate the Voyager or similar type of tour boat, and the other side ties would accommodate smaller vessels). The marina option that is implemented would be based on market demand for slip sizes in the harbor at the time the proposed project has gone through final design. Based on vacancy data collected in May 2015, over 90 percent of the vacant slips were small sizes (27 or 25 feet) which indicates that currently there is a greater demand for larger slip sizes, and therefore, the marina design with a fewer number of slips may ultimately better meet demand.

Comment PC323-74

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.

Response to Comment PC323-74

Please refer to Master Response #7: Waterfront Parking and Master Response #8: Boat Ramp in King Harbor regarding parking for the boat launch ramp.

Comment PC323-75

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 c**ommercial 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.*

Response to Comment PC323-75

Specific tenants for the new development have not yet been identified, but are likely to include commercial recreational uses, such as equipment and watercraft rentals, and charter boat opportunities, the same or similar to what currently exists on-site. Regarding the number of slips in the marina, please see Response to Comment PC323-73. Regarding parking for slip users, refer to Master Response #7: Waterfront Parking. Regarding the

pedestrian bridge, please see Response to Comment PC323-96. Please see Response to Comment PC323-63 for discussion of the Coastal Act and Draft EIR Section 3.9 for discussion of consistency with the City's certified Local Coastal Program.

Comment PC323-76

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.*

Response to Comment PC323-76

Regarding consistency with the Coastal Act, please see Response to Comment PC323-63.

The commenter mischaracterizes Section 30223. Section 30223 does not state that the use of uplands areas is prioritized for coastal recreational uses when necessary, as asserted by the commenter. Instead, Section 30223 is intended to ensure that necessary support facilities for coastal recreational uses are provided, where feasible, in the Uplands. The provision of parking within the Uplands area to support the project area, including marina and Seaside Lagoon uses, is consistent with Section 30223. As described in Master Response #7: Waterfront Parking, parking is designed to be located away from the water's edge.

Regarding Section 30244, the proposed project would expand recreational boating by providing a new boat launch ramp facility. Regarding site access, see Section 3.12, Traffic and Transportation of the Draft EIR, and

Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Regarding Section 30234, please see Response to Comment PC323-73 regarding the number of boat slips.

Comment PC323-77

> ***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. *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]*

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.
[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC323-77

Please see Response to Comment PC323-63 for discussion of the Coastal Act. As stated in Table 3.9-3, Section 3.9, Land Use and Planning of the Draft EIR, the on-site marina operator in Basin 3 would work with commercial fishing vessels who wish to return to the Redondo Beach Marina after the marina is reconstructed. Regarding charter fishing boat and whale-watching boats, refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing and Section 3.12, Recreation of the Draft EIR, which states that as part of the proposed project, some of the existing recreational uses are expected to be relocated to other locations within the project site or King Harbor, such as sightseeing, whale watching, and fishing charter boats to end of the Sportfishing Pier if the pier is rebuilt, or to the new gangways and side tie area proposed within the marina and entrance to Basin 3 (west of the proposed pedestrian/bicycle bridge). Regarding parking for the marina, please see Master Response #7: Waterfront Parking. Regarding operation of the pedestrian/bicycle bridge, please see Response to Comment PC323-96. As shown in the information referenced above, commercial fishing vessels and charter and whale watching boats could continue to operate within the project site. Therefore, the project would not be conflict with Section 30234.5 of the California Coastal Act, and there would no significant environmental impacts relative to such uses.

It should be noted that typically most of the marinas in King Harbor house non-commercial (recreational) vessels, whereas the Redondo Beach Marina in Basin 3 allows commercial (non-recreational) vessels to lease slips. It should also be noted that the definition of commercial fishing cited in Comment PC323-77 appears to

refer to the commenter's assumption made in the comment.[55] The California Coastal Act does not list a definition for commercial fisheries.

Comment PC323-78

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,

55 The Magnuson-Stevens Fishery Conservation and Management Act uses the following definitions: Commercial fishing is "fishing in which the fish harvested, either in whole or in part, are intended to enter commerce or enter commerce through sale, barter or trade." Charter fishing is "fishing from a vessel carrying a passenger for hire...who is engaged in recreational fishing." Recreational fishing is "fishing for sport or pleasure."