

and use of the unique coastal amenity, the Seaside Lagoon. Instead the project prioritizes the non- coastal dependent uses at the expense of existing coastal dependent uses.

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

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

Response to Comment PC323-78

Comment PC323-78 summarizes Comments PC323-54 through PC323-77. Please see Response to Comments PC323-54 through PC323-77, which address the issue raised. As described, therein, the commenter does not provide adequate scientific basis for assertions that the proposed project would be inconsistent with applicable land use plans, and that inconsistencies would result in physical impacts to the environment that would be greater those evaluated in the Draft EIR. Please also see Response to Comment PC323-63 for discussion of the Coastal Act.

Comment PC323-79

5.4. Proposed Land Swap with the California State Lands Commission

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

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

Response to Comment PC323-79

As described in Section 3.9, Land Use and Planning and Chapter 4 Analysis of Alternatives of the Draft EIR, regardless if the land swap is approved by the California State Lands Commission, the proposed uses on Mole D are consistent with the Public Trust. As discussed in Section 3.9.4.3.2 in Section 3.9, 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. However, under the current tidelands and uplands configuration, the proposed market hall could not be constructed as shown on the conceptual plan (Figure 2-8 in Chapter 2, Project Description of the Draft EIR) because it would be located across both the uplands and tidelands areas. The proposed land exchange would allow the entire building to be located in one area. As shown on Figure 4-2 in Chapter 4, Analysis of Alternatives of the Draft EIR, if the land exchange is not approved, the proposed conceptual alternative plan would reconfigure the market hall so that it would not be located across the tidelands and uplands boundary, and instead a larger building would be located in the uplands and a smaller building would be located in the tidelands.

As described in Chapter 2, Project Description of the Draft EIR, the Tidelands held in trust by the City are based on the mean high tide line (MHTL) designated in 1935, prior to the construction of King Harbor in its current configuration, including the excavation of Basin 3 and the filling of Mole D. The Public Trust Doctrine applies to lands such as tide and submerged lands and the beds of navigable waterways, which, under the current configuration of the harbor, more appropriately applies to Basin 3, than Mole D. Mole D is no longer tidelands, submerged lands or a navigable waterway, while Basin 3 is both submerged land and a navigable waterway. Therefore, the land exchange would enhance the physical configuration of the trust land.

Regarding the comment asserting that the land exchange would remove protections at Mole D, regardless of the uplands or tidelands designation, the Mole D in its entirety would continue to be within the coastal zone and subject to the current City planning documents that govern the uses and the allowed development intensity, including the City's LCP that is certified by the California Coastal Commission (see Section 3.9, Land Use and Planning for additional information), and therefore, protections would remain. Further, it should be noted that as discussed in Chapter 4 under Alternative 4 and summarized on Table 4-63, without the land exchange the site plan reconfiguration would result in slightly greater view impacts because of the building placement as compared to the proposed project.

Comment PC323-80

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

*6307. (a) The commission may enter into an exchange, with any person or any private or public entity, of filled or reclaimed tide and submerged lands or beds of navigable waterways, or interests in these lands, that are subject to the public trust for commerce, navigation, and fisheries, for other lands or interests in lands, if the commission finds that **all** of the following conditions are met:*

(1) The exchange is for one or more of the purposes listed in subdivision (c).

*(2) **The lands or interests in lands to be acquired in the exchange will provide a significant benefit to the public trust.***

(3) The exchange does not substantially interfere with public rights of navigation and fishing.

(4) The monetary value of the lands or interests in lands received by the trust in exchange is equal

to or greater than that of the lands or interests in lands given by the trust in exchange.

(5) The lands or interest in lands given in exchange have been cut off from water access and no longer are in fact tidelands or submerged lands or navigable waterways, by virtue of having been filled or reclaimed, and are relatively useless for public trust purposes.

(6) The exchange is in the best interests of the state.

(b) Pursuant to an exchange agreement, the commission may free the lands or interest in lands given in exchange from the public trust and shall impose the public trust on the lands or interests in lands received in exchange.

(c) An exchange made by the commission pursuant to subdivision (a) shall be for one or more of the following purposes, as determined by the commission:

(1) To improve navigation or waterways.

(2) To aid in reclamation or flood control.

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

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

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

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

(7) To resolve boundary or title disputes.

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

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

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

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

along the water.

- The exchange does not enhance waterfront development for public trust purposes. In fact the project increases the private commercial development of this section of the harbor.
- The exchange does not preserve, enhance or create wetlands, riparian or littoral habitat, or open space. In fact, public open space will be reduced in this section of the harbor. Particularly parking for recreational uses of the harbor will be negatively impacted.
- The exchange does not resolve boundary disputes.

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

Response to Comment PC323-80

The comment discussed an issue associated with statutory compliance which does not constitute a physical impact on the environment; consequently no response to comment is required.

Nevertheless, the proposed land exchange would be subject to review and approval by the State Lands Commission (see Section 3.9, Land Use and Planning of the Draft EIR). As part of the review process, the State Lands Commission would make the determination if the proposed exchange is consistent with Public Resources Code Sections 6307. As described under Comment PC323-86 above, the Public Trust Doctrine applies to lands such as tide and submerged lands and the beds of navigable waterways, which, under the current configuration of the harbor, more appropriately applies to Basin 3, than Mole D. Therefore, the land exchange would enhance the physical configuration of the trust land and would better meet the intent of the Public Trust. Please also see Response to Comment PC297-3.

Comment PC323-81

6. Recreational Use Impacts

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

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

“King Harbor

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

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

“New Parkland & Recreation Facilities

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

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

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

“General Themes:

*There is a **deficit of parks and recreational facilities** in the City.*

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

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

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

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

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

Response to Comment PC323-81

Please see Response to Comments PC323-56 and PC323-57 regarding the Recreation Element and parkland per 1,000 residents. Regarding the commenter’s assertion that the proposed project has significant impacts on existing coastal-dependent recreational uses of the harbor, please see Response to Comment PC323-64.

Comment PC323-82

6.1. Thresholds of Significance

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

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

coastal-dependent recreational resources, would represent a significant impact.**Response to Comment PC323-82**

For its CEQA documents, the City of Redondo Beach uses the recreation related significant criteria detailed in Appendix G. As described in Chapter 3.0, Environmental Analysis, an impact identified as significant would create a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the proposed project. For impacts associated with recreation, the proposed project would result in significant impacts to recreation if it would:

REC-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,

REC-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.

The purpose of the EIR is to analyze and disclose the *physical environmental impacts* associated with implementation of the project. (Pub. Res. Code Sections 21002.1(a), 21060.5, 21068; CEQA Guidelines Sections 15126.2(a), 15382.) “Economic or social effects of a project shall not be treated as significant effects on the environment.” (CEQA Guidelines Section 15131.) The thresholds of significance utilized in the EIR were also recently upheld by the Court of Appeal. The concept of “recreation” is generally defined as “a pastime, diversion, exercise, or other resource affording relaxation and enjoyment.”⁵⁶ Similar definitions include “something people do to relax or have fun: activities done for enjoyment.”⁵⁷ Concepts related to an individual’s level of enjoyment and relaxation are social issues which are beyond the scope of CEQA and highly subjective in nature. (See also *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357.) Furthermore, as also outlined in Response to Comment PC323-56, the project provides a number of recreational improvements to Seaside Lagoon. (See also Draft EIR Table 2-2, which also discusses a number of project components which provide enjoyment and relaxation.) While these may not be recreational amenities that the individual commenter would utilize, “[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.” (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492.)

Comment PC323-83

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

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

⁵⁶ Dictionary.com 2016: <http://www.dictionary.com/browse/recreation?s=t>

⁵⁷ Merriam-Webster.com 2016: <http://www.merriam-webster.com/dictionary/recreation>

Response to Comment PC323-83

Comment PC323-83 is a summary of Comments PC323-84 through PC323-99 below. Please see Response to Comments PC323-82, and PC323-84 through PC323-99.

Comment PC323-84

6.2. Recreational use of Seaside Lagoon

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

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

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

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

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

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

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

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

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

6.2.1.1. Swim feature water quality

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

Figure 21: City records act response shows location of water quality testing utilized by DEIR well outside harbor waters. Obviously, these tests cannot be used to determine water quality at the proposed Seaside Lagoon water entry in the harbor. [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 project would have swimmers using harbor waters instead. **But the water quality of the harbor water has not been evaluated.** According to a City response to a California Public Records Request (see Appendix B), the DEIR did not conduct or use any test data from harbor waters. Rather, where the DEIR does address water quality, it utilizes data from a site south of the horseshoe pier, well outside the harbor over 0.4 miles from the proposed Seaside Lagoon harbor entry (see Figure 21). One can hardly draw any real conclusions from these water tests, except that the waters in the harbor are most likely worse on any occasion due to the harbor's limited water exchange, boating impacts, the large resident sea lion population, and bird droppings washing off the break walls.

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

“Heal the Bay remains concerned with the poor water quality still observed at Cabrillo Beach harbor side Beach, despite extensive water quality improvement projects including: replacement of beach sand in the intertidal zone, removal of the rock jetty, installation of water circulation pumps, and installation of bird exclusion devices. With more than \$15 million invested in improving water quality at Cabrillo’s harbor- side, the beach is still violating TMDL limits. In a last- ditch effort towards improving beach water quality at the inner beach, the City of Los Angeles has agreed to:

- 1) expand existing bird exclusion structure into the tidal zone and across the beach face;*
- 2) design and implement an improved water circulation system; and*
- 3) commence an in-depth source identification study to potentially identify and mitigate sources of bacteria.*

The bird exclusion structure and circulation system are scheduled to be completed by the end of 2012.”²²

Despite the expenditure of over \$15M, Cabrillo Beach harbor side has continued to exceed safe swimming limits and is rated one of the top 10 worst beaches every year. (see Figure 22)

“2. Mother’s Beach, Marina del Rey

With another year of extremely poor water quality, Mother’s Beach, in Marina del Rey, moved up the Beach Bummer list from 3rd place to 2nd. It appears that the installed circulation devices are not doing enough to improve water quality at Mother’s Beach. As with most enclosed waterbodies throughout the state, poor water quality is exacerbated by poor water circulation. Three of the top Beach Bumpers are located with enclosed waterbodies.”²³

“Inner Cabrillo Beach in San Pedro is the prime example of poor water quality caused by the poor

circulation of an enclosed waterbody. In contrast, outer Cabrillo Beach (ocean side, 400 feet away) received A/A+ grades throughout the year.”²⁴

This shows that not only does water quality dramatically change inside and outside a harbor but also that enclosed bodies both north and south of Redondo Beach suffer from regular water quality issues that would prevent swimming.

Figure 22: Heal the Bay Beach Report Card shows the repeated poor quality of beaches in enclosed waters [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 study shows that water exchange rates in the this part of the harbor would take about two days to clear a pollution event. And there is no data to say how often the water quality thresholds would be violated per year. But there is ample data that shows harbors north and south of Redondo Beach have repeated water quality issues that would prevent swimmers from using the Seaside Lagoon as the project proposes.

We also have specific conditions that are unique to our site. One is the proximity to the Sea Lion barge. Sea Lion defecation in the vicinity of the protected lagoon entry is likely to impact water quality substantially. Likewise prevailing winds blow garbage in the protected area and break water tends to trap the garbage as evidenced in Figures 23 and 24. Should the new trailer boat ramp be upwind of this site, the oil, gas, trash and other pollutants associated with the boats and boaters would be blown straight into the Seaside Lagoon entry to the harbor and trapped there by the break water further exacerbating this situation.

Figure 23: Watermelon rind and kelp trapped in rocks at location where Seaside Lagoon would be open to harbor. [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 24: Floating water bottles, trash and kelp blown into proposed Seaside Lagoon entry by prevailing winds and trapped by break wall. [For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]

Lacking specific test data over long periods of time, it is reasonable to conclude that the water quality at the proposed Seaside Lagoon entry to the harbor is likely to regularly exceed safe standards. Certainly, the project should not be approved without proactively proving the water quality in the harbor would be consistently safe for swimmers. Finding out after-the-fact, that the water quality precludes most swimming, would be too late.

²³ Heal the Bay 2014-2015 Beach Report Card

²⁴ Heal the Bay 2014-2015 Beach Report Card

Response to Comment PC323-84

The commenter compares the water quality in Seaside Lagoon to that of the “standards of any public pool in California.” However, it should be noted that the water in the lagoon is salt water from the harbor that is used as cooling water for the AES Power Plant and receives no treatment other than chlorination at entry into the lagoon and dechlorination prior to discharge into the harbor. Toxicity, metals or other components that may be present in harbor water would also be present in the lagoon under existing conditions.

Regarding harbor water quality, refer to Response to Comment PC263-2. The commenter cites water quality violations at other beaches as evidence that water quality violations would occur at Seaside Lagoon. However,

there are unique conditions at Seaside Lagoon, including the proximity to the harbor mouth which provides greater water exchange as compared to other locations within the harbor (see Section 3.8, Hydrology and Water Quality in the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon). Further, it should be noted that the table presented in the comment above shows that Baby Beach, an enclosed beach in the Dana Point Harbor, is given grades of A and B during the dry summer months when swimming most commonly occurs.

The commenter is correct in noting that Cabrillo Beach is 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. However, there are different conditions at the beach than the proposed project and thus water quality at Cabrillo Beach cannot be used as indicator of water quality at Seaside Lagoon. In particular, eelgrass beds in the vicinity of Cabrillo Beach are a source of bacteria contamination at that does not exist in King Harbor. Sediments and detrital material erode from the eelgrass beds due to tidal conditions and are then carried to Cabrillo Beach where they been associated with bacteria violations.⁵⁸ Relative to Mother's Beach in Marina de Rey, as discussed in greater detail in Master Response #4: Modifications to the Seaside Lagoon, this beach is located much further from the mouth of the harbor and has poor circulation and wave movement. Due to this poor circulation, there is less frequent water exchange and worse water quality than would occur at Seaside Lagoon.

Additionally, refer to Master Response #4: Modifications to the Seaside Lagoon regarding water quality at the lagoon, including trash accumulation, presence of sea lions, and proximity of the boat ramp.

Comment PC323-85

6.2.1.2. Impacts on use of reconfigured Seaside Lagoon for swimming

Currently, Seaside Lagoon is attractive to parents for the following attributes:

- Clean water filtered and treated water
- Sandy beach and pool - simulates ocean beach without risk
- Gently sloping depth with roped off area for small children
- Plenty of lifeguard protection
- Slides and water fountains to keep kids entertained
- Enclosed area to prevent kids from wandering off
- Lack of tidal and wave action, sand bars, etc.
- Food convenient to site
- Close parking - don't have to lug gear far
- Close restrooms

It is clear that multiple attributes make the current Seaside Lagoon such a popular recreational area. Figure 25 compares each of these attributes and a couple added attributes to assess the impact of the proposed reconfiguration.

⁵⁸ Largier, John and Mitzy Taggart. 2006. Improving Water Quality At Enclosed Beaches A Report on the Enclosed Beach Symposium and Workshop (Clean Beaches Initiative). Prepared for State of California State Water Resources Control Board Clean Beaches Initiative. June. Available at: http://www.waterboards.ca.gov/water_issues/programs/beaches/cbi_projects/docs/enclosed_beaches_report.pdf

Attribute	Current Configuration	Proposed Configuration
Size water area	Stable, proven adequate for current attendance	Likely much smaller, and changes dramatically with tide, dredging likely required to maintain depth
Size usable beach/grass	Stable, proven adequate for current attendance	Changes dramatically with tide, park over is 1/3 smaller
Sandy beach and water feature	Yes	yes
Water Quality	Controlled	Likely to exceed safe limits regularly
Depth	Non-changing, roped off area for wading kids	Changes dramatically with tide, cannot rope off safe depth
Lifeguard protection	Yes on all sides	No according to DEIR consultant, limited to shallow end even if there are lifeguards
Slides and water fountain	Yes	No
Enclosed to keep kids protected and controlled	Yes	No
Tide and wave dangers	No	Tide and sand bar depth changes, not likely to be significant waves
Food availability	Yes, concession external to park boundaries.	Yes, but concession cuts into beach area available
Close parking	Yes	No, will have to fight for space in parking structure and lug kids and gear through the parking structure, through a shopping area and across an active street
Close restrooms	Yes	Yes
Potential Sea Lion haul out	No	Yes
Conflict with other harbor users	No	Yes

Figure 25: Comparison of key attributes of Seaside Lagoon as is and as proposed. Clearly, the features that make the lagoon attractive for parents are significantly impacted by proposed plan.

Swimming area size - There is no discussion about how swimming would be controlled in the reconfigured Seaside Lagoon. It is unlikely the city would allow swimmers in the turn basin, whether or not the trailer boat ramp remains in the primary position discussed in the DEIR. Swimmers are not very visible to boaters and especially boaters occupied with dropping sail or avoiding other vessels. Thus the reasonable assumption is swimming would be limited to inside the small breakwater at the site. This is actually a very small area that would change substantially in depth with tide as shown in Figures 26 and 27.

Figure 26: Note how small the area bounded by the breakwater on the left is. Also this shot at low tide shows the dramatic affect tide will have on depth and size of the water area. [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 27: The impact of tide is very apparent in this image. At mid tide, the water is up to the inner

break wall with no sand bottom showing (see Figure 24) [For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]

Estimates based on the DEIR plan views and the known dimensions of the current configuration show the swim area going from about 400' x 140' in today's configuration to about 140' x 150' at mid-tide in the proposed configuration. This represents a dramatic loss in swim area. An unknown variable ignored by the DEIR is how much this area will shoal over time (as evidenced in Figure 27) and how much dredging would be required to maintain usable depths at low tides. Also it is likely sand on the beach would have to be replenished as it is pulled into the harbor by tides, waves, and rain runoff. The DEIR is silent on all of these very real concerns related to the long term usability and maintainability of the proposed configuration.

Regardless, the loss of the many attributes that make the current lagoon attractive to families with young children disappear in the proposed configuration. Even if the water areas were the same size, attendance would never achieve the levels of today.

Response to Comment PC323-85

The commenter is correct that some existing features of the lagoon would be removed, such as the fountains and the fencing. However, as discussed in Chapter 2, Project Description and Section 3.12, Recreation of the Draft EIR, new features would be provided, including the establishment of connectivity with the harbor and unrestricted access. Varying opinions on the desirability of the modified features is to be expected, and do not address an environmental issue or result in an environmental impact. As described in Section 3.12 of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon, while features would change, the coastal recreational use of the site would remain. Further, the increased availability of the site would be a recreational benefit.

Additionally, refer to Master Response #4: Modifications to the Seaside Lagoon and Master Response #7: Waterfront Parking regarding parking for Seaside Lagoon and safety of walking from the parking structure; refer to Master Response #4: Modifications to the Seaside Lagoon regarding safety relative to the presence of life guards and multiple types of users (i.e., swimmers and hand launchers) and regarding the size and usability of swimming area.

Maintenance of the project site, including Seaside Lagoon, is assumed in the operations analysis in each resource analyzed in the Draft EIR (Sections 3.1 through 3.14). The Draft EIR page 3.8-69 states that under the proposed project, Seaside Lagoon would be opened to the waters of King Harbor. Because the lagoon would be protected by the existing North Breakwater and small breakwater at the lagoon mouth, as well as the proposed breakwater for the boat launch ramp, the lagoon would be sheltered and would not be subject to wave action that would cause erosion of the beach sand. In addition, as there are little tidal currents capable of moving or transporting sediment, such as wave action, during normal conditions, the potential for shoaling within the lagoon is low. Sand replenishment requirements for the beach are also anticipated to be low simply because wave heights won't be high enough within the sheltered lagoon area. As such it is unlikely wave action capable of moving sand offshore will occur similar to what open ocean beaches experience during the winter months. Maintenance will likely be confined to grooming and re-grading to maintain the desired shape and aesthetic. The specific need for maintenance dredging and sand replenishment would be addressed as part of City operations; however, at this juncture such dredging activities are considered speculative. As described in Section 3.8, Hydrology and Water Quality of the Draft EIR, best management practices that the project must comply with during construction would also apply to maintenance operations.

It appears that the commenter presents Figure 26 as intending to show the size of the opening of the lagoon [please refer to the PDF of the comment letter in Volume II of the Final EIR]. The photograph is

taken at the far southwest corner of what would be the modified lagoon, and the general size of the area that would be available to swimmers is obscured by the hand launch dock. Further, the photograph does not provide a representation of the size of the area once the breakwall is removed. The size of the swim area, including with tidal variation, is represented on Figure 3.12-5 in Section 3.12 of the Draft EIR.

The commenter provides Figure 27 to show the edge of the far southwest corner of what would be the modified Seaside Lagoon (angled toward the existing breakwall instead of the water) at low tide under existing conditions. As described in Section 3.12 and shown graphically on Figure 3.12-5, the commenter is correct that the amount of water area would vary with the tide. This comment does not introduce new environmental information, nor does it directly challenge information presented in the Draft EIR.

No data or other evidence is provided to support the commenter's statement that attendance would be lower. It should be noted that the accessibility of the site is increased (i.e., there would no longer be an admission fee, fencing would be removed, and there would no longer be restrictions on the hours and days of operation (i.e., currently less than 3.5 months in operation, from 10 a.m. to 5:45), which would greatly increase the availability of the public to use and access the lagoon.

Comment PC323-86

6.2.1.3. Impact of combining water recreational uses

The DEIR does not have solid facts and figures on harbor use by Stand Up Paddlers, kayakers and outrigger canoers. According to the Recreational Boating and Fishing Foundation the sport of kayak fishing has grown to 1.978M people in the US. Stand Up Paddle boarding has exploded. According to the 2015 Special Report on Paddle sports, Stand Up Paddle boarding has grown every year since 2010, when the industry consortium started gathering statistics. Participation is currently at 2.8M people who went on 13.7M outings in 2014. According to census data, 2% of the population in the Pacific states participate in Stand Up Paddling. This trend has been noted in recent public forums about SUP'ing in King Harbor.

"Stand-up paddling is not a fad," he [Gene Smith, owner of Tarsan Stand-up Paddle boards] said. He compared the sport's growth to that experienced by snowboarding. "When people tell me they think it's a fad, I ask them 'Do you ski, or snowboard?'"

Harbor Patrol Tim Dornberg confirmed the shop owners' belief in the sports staying power.

"I've been a boater for 40 years and a harbor patrolman for 25 years and I've never seen a sport²⁵ grow exponentially like stand-up paddling," he said. "I'm on my fourth paddle board," he added.

By any objective measure both sports are popular activities in King Harbor. The DEIR study on current boat traffic did not have any actual counts of use of the current hand launch boat dock. It estimates 50 launches per day on peak weekends. In our experience, this count seems low. Ownership is growing as the sport grows and the hand launch is the only publicly available, legal, launch point in the calm harbor waters. The DEIR estimates at least 200 SUP rentals on peak weekends.

While the DEIR project description lacks any detail about how the shared water feature would be used for swimming and for a kayaking/paddle boarding launch point, there are only two real alternatives.

One alternative would be to allow both uses to mingle. This would be hazardous to kids swimming and playing near beginning paddle boarders or kayak fishermen. Beginner paddle boarders fall without being able to control where their board is going, where their paddle goes and where they themselves fall. Playing children could easily be struck by the paddle, the paddle or the board. Likewise, with kayak fishermen, small kids could grab

equipment on the kayak and injure themselves or damage the equipment. So this approach introduces real hazards that don't occur today.

The second alternative would be to divide the water by float lines to designate a swimming portion and a portion for the kayakers/paddlers. As discussed in the previous section, the size of the usable water area drops dramatically in the DEIR proposed project. This solution would further exacerbate the loss of usable water area.

No matter which solution is implemented, it makes the area less desirable for parents of small children and artificially constrains the use of the Seaside Lagoon. And the inconvenient parking is likely to impact both uses.

²⁵ " Stand-up paddlers in Redondo Harbor get boaters, harbor patrol support" , Easy Reader, Oct 17, 2012

Response to Comment PC323-86

The comment states the estimate of the number of users of the hand launch appears to be low, but does not provide data or other evidence that this is the case. Therefore, the number of hand launches presented in the EIR has not been revised. Please see Master Response #4: Modifications to the Seaside Lagoon regarding use of Seaside Lagoon by multiple types of users and safety.

Comment PC323-87

6.2.1.4. Beach reconfiguration impacts

The proposed reconfiguration of Seaside Lagoon shrinks the usable portion of the park by 1/3rd. That area is then subject to tides. The DEIR clearly shows the dramatic loss of beach area at high tide, but even at low tide the usable area is smaller than today.

The fence is gone, so the comfort of having kids confined to a controlled area is gone as well. There is an active roadway crossing the park in extremely close proximity to the park beach and there is exposure to strangers. It is questionable whether day camps could operate in this smaller and less controlled environment. The loss of usable beach and the loss of the controlled area combined with the close proximity of the road, and strangers impact the appeal of the park for families with young children. Add kayakers and SUP'ers traversing the area with their equipment and gear and the problem is only exacerbated. *In response to a California Public Records Act Request, the City responded that they had no estimate of the loss of usable parkland land area based on the proposed project. The DEIR does not provide any evaluation of the impact of the loss of usable beach area either.*

Response to Comment PC323-87

Please see Master Response #4: Modifications to the Seaside Lagoon regarding the size of Seaside Lagoon, including tidal variation. Please see Response to Comment PC323-85 above regarding varying opinions on the desirability of the modified features of Seaside Lagoon.

Comment PC323-88

6.2.1.5. Parking configuration impacts

Currently families can park immediately adjacent to the Seaside Lagoon in a 3 acre surface parking lot. SUP'ers and kayakers can access the hand launch boat ramp by the access road (as shown in Figure 28), drop off their gear and equipment and park immediately adjacent to the ramp while keeping their gear in sight. Anyone trying to pilfer the equipment would have to load it in a vehicle and head out the only exit to the hand launch boat ramp in full view of the owner. And the distance from the surface parking to the hand launch ramp is a short distance - easy to carry an SUP or wheel a kayak if a user does not want to drop off their equipment

right at the dock.

Figure 28: SUP'ers lined up to offload their SUP's at the hand launch boat ramp. Users must turn around to exit as their is no exit in the direction the vehicles are pointing.

Stealing a dropped off board or kayak would be difficult due to this configuration. [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 proposed reconfiguration shows approximately 40 to 50 surface parking spaces in near proximity to the Seaside Lagoon. The DEIR is silent as to how these parking space may be restricted, but it is doubtful the parking could be effectively managed to support on Seaside Lagoon users. Regardless, with an average of 753 users per day, not counting the kids camp or private events, and assuming conservatively that users would come four to a car, on the order of 175 car spaces would be required. And then the stand up paddlers, kayakers and other users need to be added. None of these users are included in the parking assessment in the DEIR. The only remaining parking is some of the few surface parking spaces further south in the private road or the parking structure.

Families going to the Seaside Lagoon for the day would have to negotiate their kids and all their toys and gear through the parking garage, through shops and restaurants, and then across an active road and parking spaces to reach the park. Other than day camp users, it is unlikely parents would drop off their kids and then find parking.

Stand up paddlers and kayakers would face similar problems. Hauling a kayak or SUP through a parking garage, through shops and restaurants, across an active road and parking spaces to reach the beach is asking for gear and vehicle damage and exposing shoppers and restaurant goers to being whacked in the head by a kayak, paddle, fishing gear, or an SUP. It is doubtful that kayakers and SUP'ers would drop off their board, kayak and equipment and then leave to find parking. The nearby road makes it very easy to pilfer equipment and leave before anyone finds out.

The loss of nearby surface level parking is a real and significant deterrent to use of the park by those who use it the most today.

Response to Comment PC323-88

Please see Master Response #4: Modifications to the Seaside Lagoon and Master Response #7: Waterfront Parking regarding parking options for Seaside Lagoon and see Master Response #7: Waterfront Parking regarding the parking assessment.

As for being able to safely drop off an SUP, similar to existing conditions, it would be up to each individual to safely store their equipment. The current proposal includes SUP storage. The access road and parking stalls located within the park area would also 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. A condition of approval requiring the provision of short-term loading and unloading for Seaside Lagoon will be recommended to the project approval body as part of the conditional use permit approval process.

Comment PC323-89

6.2.1.6. Trailer Boat Ramp Impacts to swimmers and paddlers

While the DEIR discusses several alternatives for the location of the trailer boat ramp, most of the DEIR treats the ramp location as the current Joe's Crab Shack site adjacent to the Seaside Lagoon Park. The DEIR study recommends other locations to prevent the risk of hazardous interactions between the boats and paddlers. While it suggests a potential mitigation of a buoy line separating exiting and entering traffic, this only mitigates part of the problem.

The breakwater required to calm waters at the boat ramp would create a blind spot for boaters who would not be able to see paddlers returning to the Seaside Lagoon launch point. This blind spot combined with task saturation when getting underway creates a hazardous condition. Perhaps more alarming is that both the boater and paddler may be neophytes unused to rules of the road and how to handle their watercraft to quickly resolve a dangerous crossing action.

And finally, the pollutants and trash that are inevitable from the boat ramp would be blown right into the swimming area by prevailing winds.

Locating the trailer boat ramp in close proximity to paddle craft is a dangerous situation and should be avoided no matter where the boat ramp is ultimately located.

Response to Comment PC323-89

As clarification on the proposed boat ramp, the proposed project analyzed in the EIR includes a boat launch ramp facility at Mole C (the current Joe's Crab Shack location) (refer to Chapter 2, Project Description in the Draft EIR). Additionally, six options for other locations and configurations are considered under Alternative 8 in Chapter 4, Analysis of Alternatives. The Draft EIR determined that the other locations and configurations would have reduced environmental impacts as compared to the proposed project (see Tables 4-64 and 4-66 on page 4-428 and page 4-430 respectively of the Draft EIR), but the commenter incorrectly asserts that the Draft EIR "recommends" other locations. The Draft EIR presents the alternative locations and configuration to inform the public and decision-makers about potential impacts associated with each of the analyzed locations and configurations consistent with CEQA requirements.

Please see Master Response #4: Modifications to the Seaside Lagoon and Master Response #8: Boat Ramp in King Harbor regarding safety issues associated with a boat launch ramp at Mole C in proximity to Seaside Lagoon. Please see Section 3.8.4.3.1 in Section 3.8, Hydrology and Water Quality of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon regarding pollutants and trash relative to proximity of the boat launch ramp and Seaside Lagoon. Furthermore, mitigation measure MM TRA-8 in the Draft EIR (renumbered MM TRA-7 per Chapter 3, Modifications to the Draft EIR in this Final EIR) requires the leaseholders for rental equipment to provide instructions on safety and water signage.

Comment PC323-90

6.2.1.7. Sea Lion Haul Out at Seaside Lagoon

The opening of Seaside Lagoon to the harbor exposes the lagoon to potential use as a Sea Lion haul out. Sea Lions have hauled out at similar beaches in Cabrillo and Marina Del Rey. The close proximity of the growing number of sea lions using the Sea Lion barge increases the potential for haul out on the beach of the reconfigured Seaside Lagoon. Indeed, the current Marina Manager has already encountered sea lions in the parking lot inside of the current Seaside Lagoon.

"We have a problem," said Leslie Page, the property manager of Redondo Beach Marina. "I've had

five of them wandering around the parking lot. I had one knock on the front door of the marina office next to R10 Social House (restaurant).”²⁶

The DEIR admits there may be a problem. And the statement above certainly shows the possibility to be foreseeable. The DEIR states the city will have a management plan approved. It is questionable such a plan would be approved. Two communities in Southern California have been unsuccessful in convincing state and federal officials to approve their plans to move pinnipeds off their beaches.

And even if the City does get such approval, what will be the reporting mechanism and response time? Kayak fishermen go out very early in the morning. Most SUP’ers go out after work during the weekdays. That is a long and expensive time to keep a public official available to chase off a sea lion. And **how is a returning paddler to contact the appropriate authority. The operational details should be available to public so they may assess the real impacts.**

Interaction of sea lions with children is dangerous. Many kids have little fear of the cute, friendly looking creatures. And imagine the situation where you have kids on one side and a paddler coming into the confined waters. *A sea lion that feels trapped is a dangerous sea lion.*

The DEIR states interactions are minimized by the change in configuration, but that makes no sense. Certainly the current configuration prevents any interaction between the sea lions and the users of Seaside Lagoon. *Clearly, the less impactful solution is to keep Seaside Lagoon separate from the harbor waters.*

If the City is determined to open the Seaside Lagoon, approval of the management plan and addressing the operational issues should be mandatory prior to the final EIR so that the public can fully assess the impact.

²⁶ “Sea Lion Population in King Harbor is ‘out of control’”; Daily Breeze, Carly Dryden; April 24, 2015

Response to Comment PC323-90

The potential for sea lions to use Seaside Lagoon is addressed in Section 3.3, Biological Resources of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon regarding sea lions. Additionally, see page 3.3-34 of Section 3.3, which addresses public beaches that have history of sea lions habitually hauling out on the sand and those that do not (including Mother’s Beach in Marina del Rey).

To clarify the commenter’s assertion the Draft EIR “admits there may be a problem” relative to sea lions, the Draft EIR pinniped use of Seaside Lagoon is not likely due to several factors described on page 3.3-45 and 3.3-46 of the Draft EIR and the impact is determined to be less than significant.

The comment states that two communities in southern California have not been able to receive approval of plans to move pinnipeds off their beaches. The commenter does not state to which communities the comment refers; however, it assumed that the commenter is referring to efforts to remove established populations of sea lions from beaches in San Diego, most specifically in La Jolla Cove. Attempts to control the existing sea lion population at La Jolla beaches are not apt comparisons to the proposed project. Removal of an established pinniped population, such as at La Jolla, is a complex issue of both regulatory authorities and public controversy. While many of the same tools available to the City of Redondo Beach can be applied to the circumstances at La Jolla Cove, relocation of an established haul out is more complex due to the behavioral habituation of the animals and the numbers of animals involved. This may be facilitated by permits issued by National Oceanographic and Atmospheric Administration (NOAA) Fisheries under the Marine Mammal Protection Act (MMPA); however, the necessity of permitting is dependent upon how and by whom relocation of the colonies is to be performed. Within King Harbor, the City of Redondo Beach is proposing to establish a

marine mammal management program (MMMP) to discourage animals from establishing a presence at the project site in the first place. The City has authority to do this without obtaining permits from NOAA Fisheries⁵⁹ under Marine Mammal Protection Act Section 109(h), which states:

Nothing in this title shall prevent a federal, state or local government official or employee or a person designated under section 112(c) from taking (harassing), in the course of his or her duties as an official, employee or designee, a marine mammal in a humane manner (including euthanasia) if such taking is for

- A) protection of the welfare of the animal;
- B) the protection of the public health and welfare or safety; and
- C) the non-lethal removal of nuisance animals.

As discussed in Section 3.3, prior to the opening of Seaside Lagoon, the City would develop and begin implementation of the MMMP prior to the opening of Seaside Lagoon (see COA BIO-3 beginning on page 3.3-46 of the Draft EIR). The MMPA would include the determination that the City has the authority to take (i.e., remove) pinnipeds in compliance with the Marine Mammal Protection Act Section 109(h) and would identify marine mammal controls that prevent the development of new haul-outs on beaches, public and private structures and vessels within King Harbor. This MMMP would also require a public education program that includes on-site signage providing information about the MMMP and indicating who the public should call, should they identify an animal that could pose a threat to human safety.

The commenter has raised concerns about how the mechanics of the plan would be implemented in real-time. Specifically, concerns were raised about how the City would staff the needs and how a returning paddler is to contact appropriate authorities regarding sea lion issues. It is important to note that the purpose of the plan is not to eliminate marine mammals from King Harbor, but rather to reduce undesirable interactions to protect public health and welfare, and safety. Pinnipeds become nuisance animals when they start to defend the beach as their own. This habituation of animals and development of territorial behaviors does not occur immediately but over a period of time when the animal is not hazed away. The reporting of the occupancy of animals on the beach is to assist in identifying potential development of problems thus allowing rapid response to not let habituation to the area occur. It is not intended to suggest that action need be taken immediately upon the occurrence of an animal on the beach as most occurrences will tend to be one-time events rather than patterns of behavior.

Regarding the commenter's assertion that the MMMP should be completed prior to the final EIR, this is not required under CEQA. The Draft EIR does not identify a significant impact associated with this issue, nor does the commenter provides scientific evidence that the impacts relative to human-sea lion interactions would be greater than those evaluated in the Draft EIR. Further, COA BIO-3 identifies the components that must be included in the MMMP as well as required timing and performance measures. Regardless, your opinion is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

⁵⁹ While the MMPA provides for lethal measures to be applied by government officials in the course of ensuring public health and welfare, unilateral lethal action should not be taken under MMMP. The exception is for animals that pose an imminent threat to public safety due to active aggression that cannot be dissipated. If all measures of non-lethal deterrents have been exercised to no avail, expanded coordination with NOAA Fisheries marine mammal staff should be undertaken in an effort to garner input and assistance in hazing, trapping and relocation, or euthanasia of the animal.

The commenter asserts that the Draft EIR states that interactions are minimized by the change in configuration. However, the commenter does not reference where this statement is made in the Draft EIR and it could not be located. Page 3.3-46 in Section 3.3, Biological Resources of the Draft EIR, states that whether the opening of Seaside Lagoon would directly affect sea lion haul-out preferences or increase public-pinniped interactions, this would not result in a change in the level of human-pinniped interactions in comparison to existing conditions such that there would be a substantial adverse impact on pinnipeds.

Comment PC323-91

6.2.1.8. Impacts of Seaside Lagoon reconfiguration on pedestrians

The current Seaside Lagoon configuration allows pedestrians to be right on the water's edge with great view of the harbor and launching and returning paddlers. It provides a contiguous path out to Portofino Way where pedestrians can walk along the water at the Portofino Marina in either direction. This promenade is well used by pedestrians and joggers today as shown in Figure 29. It could use some sprucing up but is well used and well liked.

Figure 29: Pedestrians enjoying waterside path behind Seaside Lagoon on a cool winter day [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 configuration described in the DEIR routes the pedestrian path in amongst shopping and restaurant lease spaces with a road and parking very nearby and sand between the path and the waterfront. It then routes straight out to Portofino Way as depicted in the DEIR without returning to waterfront. Yet elsewhere, the DEIR evaluates that the current lack of the pedestrian path at the Joe's Crabshack site as a negative. The DEIR seems to ignore this with the primary project assessment and shows its pro- development bias.

The walk path today better meets the stated requirements of the zoning which is to have a pedestrian path along the waterfront. We can certainly make the current path far more attractive without all the overdevelopment and impacts of the proposed project.

Response to Comment PC323-91

The comment incorrectly characterizes the pedestrian boardwalk in the vicinity of Seaside Lagoon. The proposed boardwalk would extend through Seaside Lagoon along the beach. At this location due to tidal fluctuations and park design considerations, it is not feasible or practical to have the boardwalk along the edge of the water, so instead the boardwalk would be at the landward edge of the beach. As noted by the comment there would be sand between the path and water, but instead of being "amongst" the shopping and restaurants, it would be seaward of the development and Seaside Lagoon accessory structures and thus still afford open views of the Harbor.

The commenter is incorrect that the boardwalk does not reconnect with the water's edge west of the lagoon. As shown on Figure 2-20 in Chapter 2, Project Description of the Draft EIR, the boardwalk through the lagoon has several connections, including connection with the sidewalk along Portofino and extending west through the boat ramp site along the water's edge where it connects with the existing path at the western end of Mole D. Currently, some portions the walkway along the water's edge are less than 12 feet as contemplated in the City's current Coastal Zoning (in particular along Joe's Crab Shack and along the southwestern edge of Mole D). Further, there is no pedestrian pathway on the southern and eastern edge of Mole D. Therefore, the new walkway would better meet (and exceed) the 12-foot width requirement, and complete a missing link of the path along Mole D and thus better meet the Coastal Zoning requirements.

Comment PC323-92

6.2.1.9. Impact of opening Seaside Lagoon year round

The DEIR makes a big deal about opening Seaside Lagoon year round, as though that would suddenly facilitate more use of the park. Opening Seaside Lagoon year round would have little impact.

First, paddlers already can launch year round without fee and they have better parking and access today than in the proposed project. So the current conditions are better for paddlers of all types.

As to swimmers using Seaside Lagoon, once school starts and the weather and water get cool, not many would use the Lagoon in its current configuration. Attendance drops off rapidly at both ends of the season based on city data. That is why the Lagoon closes for the year. Opening up the lagoon to the harbor introduces all of the negatives already discussed and does not represent any realistic increase in potential usage.

From a fee perspective, the fees are low and certainly attendance does not appear to be deterred by charging the current fees.

When you evaluate against all the criteria, shrinking the Seaside Lagoon usable park area, making parking inconvenient, and opening it up to tidal, untreated harbor waters is a significant negative impact on the most used park in Redondo Beach. The fact that the DEIR concludes otherwise shows the bias that has influenced the conclusions. And you see yet again how the private commercial development has been prioritized over the public, coastal dependent recreational uses of the harbor.

Response to Comment PC323-92

The commenter implies that, except for use by hand launchers, there would be not recreational value associated with the modified Seaside Lagoon outside of the summer months. However, this is not correct. Regarding water activities, Southern California often has warm days outside of the summer months when trips to the beach are commonplace. There would be members of the public that would chose to swim, wade, or otherwise play in the water outside of current opening months (Memorial Day to Labor Day) and the current hours of operation (10:00 am to 5:45 pm). Further, the modified Seaside Lagoon supports non-water recreational uses, which the public can engage in any time of year. This includes picnicking, beach play, movies on the beach, and passive use of seating area along the edge of the beach. There is currently no similar area within the project site that offers these uses outside of the summer months, and for no cost at any time of the year. Regarding the admission fee, while it may not lower attendance, it does limit access to the only park within the harbor that offers beach and swimming recreation to the public. Please see Master Response #4: Modifications to the Seaside Lagoon and Response to Comments PC323-84 through PC323-91 above, regarding the size of the park, parking options, and water quality.

The commenter's opinion on the Draft EIR is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-93

6.2.1.10. Open space in development replaces Seaside Lagoon loss

Consultants, CenterCal and City officials have tried to portray the open space amenities of the retail, restaurant development as an equitable replacement for the loss of Seaside Lagoon usable park space.

First, much of the open space attributed to the retail/restaurant development exists today. For example, the

perimeter pedestrian promenade, the open space on the pier, and the plaza leading into the current sport fishing pier all exist today. In fact, much of the usable open space today is covered over by development in the proposed plan such as Pad 2 on the Pier; the site of the old octagonal building currently used for outdoor public movies; the broad deck above the international boardwalk; and potentially the sport fishing pier. So in actuality, there is a net loss of publicly usable open space throughout the project area.

Second, much of the new plan's open space in the harbor area is simply amenities to serve the retail, restaurant development - a "Bellagio type" water feature, places to sit and eat outdoors for the nearby restaurants, a play area for kids. These amenities can be found at nearly every mall in the area. They are hardly equivalent of public parkland and especially a unique recreational park like Seaside Lagoon today.

Third, the uses provided in the retail/restaurant area of the project are neither public parkland nor are they coastal dependent recreational uses. Again, they are simply amenities for the shopping and dining.

It is deceptive for the proponents of this development and the consultants who developed the DEIR to try to paint some equivalency between the shopping/ dining area open space amenities of the proposed project and the loss of usable space in Seaside Lagoon public parkland.

Response to Comment PC323-93

The Draft EIR presents the amount of open space existing within the project site (11.6 acres)⁶⁰ and the amount that would exist under the proposed project (11.4 acres)⁶¹ in Chapter 2, Project Description of the Draft EIR (Figures 2-7 and 2-21 respectively). While the Draft EIR compares the quality of the open space that would be provided at the project site overall with the general quality of the open space existing today, it does equate open space elsewhere in the project with public park area nor does it state that open space provided elsewhere at the project site is a "replacement for the loss of Seaside Lagoon usable park space" as claimed by the commenter. Instead the Draft EIR provides an assessment of the existing and proposed open space at the project site overall. As described in Chapter 2, the determination of what constitutes open space is based on the City's Zoning Code, and includes the pedestrian/bicycle pathways that are a minimum of 10-feet in width, public plazas, landscaped areas that not fenced or gated and are a minimum of 10-feet in width, open areas on the piers, and Seaside Lagoon. The same criteria is used to assess both the amount of existing and proposed open space.

As described in Chapter 2 and Section 3.12, Recreation of the Draft EIR, the existing open space has varying utility and quality. As stated above the amount of proposed open space would be similar to existing conditions (though slightly less if the Sportfishing Pier is not replaced); however, enhancements would occur under the proposed project throughout the site, such as the addition of new landscaping, lighting, benches, decorative fountain and centrally located public gathering spaces. The new open spaces would be integrated into the overall site design to provide more useable and visually pleasing spaces throughout the project site.

The areas characterized by the commenter as "usable" open space, are included in the calculation of existing open space as shown on Figure 2-7 in the Draft EIR. As noted by the commenter, some of these spaces would be occupied by new buildings under the project; however, the commenter's statement about a reduction in usable open space appears to not consider the new open space areas that would established under the proposed project. The new open spaces would largely offset the loss of existing open space (see Figure 2-21 in the Draft

⁶⁰ The existing open space calculation includes Seaside Lagoon, although access to Seaside Lagoon is currently subject to an admission fee and only open certain times of the year.

⁶¹ This is a conservative estimate. If the Sportfishing Pier is replaced, the amount of open space would be approximately 3,960 square feet greater.

EIR). The loss would be fully offset if the Sportfishing Pier is replaced.

The commenter is of the opinion that the new open space would primarily serve the retail and restaurant development; this opinion is noted. It should be noted that much of the open space is designed to capitalize on the waterfront location, including providing visual and physical access to the water's edge and enhancing the pedestrian and bicycle pathways. Public seating and tables (available to any visitors to the site regardless if they are patrons of the retail and restaurants) and other public features such as the fountain would be located close to the water's edge to benefit from on the waterfront location. Additionally, public gathering areas, including areas for public events such as outdoor movies, would be provided, primarily in the northern portion of the project near Seaside Lagoon and the market hall.

The comment does not introduce new environmental information. Based upon the discussion above and the information contained within the Draft EIR, no further analysis would be required.

Comment PC323-94

6.3 Recreational use of new boat ramp

6.3.1. DEIR Primary Assessment

The Coastal Commission has mandated a trailer boat launch ramp be built with any new development in the harbor. The Commission feels that boat hoists currently used in King Harbor intimidate and deter trailer boaters from using King Harbor and that a boat ramp would increase usage.

The South Coast region has the highest boat ownership in the US. In 2001, the total ownership was at 245,380 owners. The projection for 2020 was an increase to 320,691 owners. The state predicted a need for 10 to 48 more boat ramps in our region²⁷ Redondo is the only harbor in the 25 miles of coastline between Marina Del Rey and Cabrillo Marina in the Port of the LA. With well renown fishing spots like Rocky Point, there is no doubt there is a pent up demand for a boat ramp in King Harbor.

As spelled out under the Land Use evaluation of this document, current Redondo zoning requires 67 trailer parking spaces for the boat hoists. The parking analysis evaluates only 20 such spaces. Marina Del Rey currently has an 8 lane boat ramp with over 200 trailer spaces and Cabrillo Beach currently has a 3 lane boat ramp with over 100 trailer spaces. The California Department of Boating and Waterways' "Layout Design and Construction Handbook for Small Craft Boat Launching Facilities" calls for a minimum of 20 to 30 trailer parking spaces per lane. ***Restricting the proposed Redondo ramp to just 20 trailer spaces artificially limits the capacity of any planned boat ramp and represents a reduction in capacity from the current infrastructure.*** Given the pent up demand, the ramp should have at least 30 spaces per lane and it would reasonable to require a minimum of two lanes.

The DEIR specifically calls out space restrictions as limiting factors in the alternatives for the boat ramp. **This is a clear indication that the project prioritizes the non- coastal dependent shopping, restaurant, hotel and theater uses over the use of the harbor for boating.** This prioritization is the reverse of that required by the Coastal Act and the Local Coastal Program approved for Redondo as detailed in the Land Use section of this document.

Having to negotiate most of the way down the narrow Portofino Way, and then turning into the space constricted ramp parking lot only to find there are no parking spaces would be a very frustrating situation and generate needless traffic of a vehicle/trailer combination on very constricted roadways in the harbor area. This increases congestion, increases potential of accidents and increases the likelihood that frustrated boaters would

be artificially deterred from using the ramp in the future. The situation is exacerbated by the location of the new parking structure further consolidating traffic congestion on these key and very constrained intersection.

Add the proximity hazards represented by the paddlers launching from Seaside Lagoon and it only builds the case that this is a bad location for a new boat ramp.

The primary location at the Joe's Crab Shack site presents extreme challenges and is not the best alternative for recreational use of the harbor for boating. The site is too small and inconvenient from an access perspective. It represents a hazard to paddlers and swimmers.

²⁷ California Boating Facility Needs Assessment Volume V, October 15, 2002

Response to Comment PC323-94

Please see Master Response #8: Boat Ramp in King Harbor regarding the constraints of installing a boat ramp in King Harbor, boat ramp parking, access, safety, and parking. As for the commenters assertion regarding a vehicle/trailer having to negotiate most of the way down the narrow Portofino Way, and then turning into the space constricted ramp parking lot only to find there are no parking spaces would be a very frustrating situation and generate needless traffic of a vehicle/trailer combination on very constricted roadways in the harbor area, 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. Vehicle width is seven to just over eight feet. Width of a boat is about eight feet. The standard size of a roadway needed is 10 feet to negotiate a vehicle/trailer. Portofino Way is two lanes (one in each direction) and about 30 feet wide near Joe's Crab Shack, which is wide enough lane width to safely negotiate with a vehicle/trailer. In addition, Portofino Way is a straight roadway with slow speeds. Additionally, all the Alternative 8 boat ramp options include 60-foot radius roundabouts within the facility to provide adequate queuing space for vehicles with trailers waiting to be launched or just negotiating the parking area. Should the boat launch facility be full, a vehicle/trailer would be able to turn around at the facility or at the end of Portofino Way. As for congestion, 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 Portofino Way or Harbor Drive. The City's management of the site may include a kiosk and perhaps a reservation system, if needed. The staff at the kiosk would manage congestion along the roadway

Additionally, as clarification, the commenter appears to be asserting that the land use analysis in the Draft EIR (Section 3.9, Land Use and Planning) states that 67 trailer parking spaces for the boat hoists is required by the Redondo Beach Zoning Code. However, no such requirement exists, nor is identified in Section 3.9. Redondo Beach Municipal Code Section 10-5.1706 sets parking requirements for the project; there are no identified parking requirements for boat hoists.

Comment PC323-95

6.3.2. DEIR Alternatives Assessment

The DEIR format makes it very difficult for the public to fully understand the full implications of each boat ramp alternative. Rather than describing each in full with its impacts, the alternatives are spread out through each individual DEIR assessment area, making it very challenging to integrate the information.

The DEIR exacerbates the confusing formatting by making broad and vague statements such as siting the boat ramp on Mole D would increase development on the northern section of the harbor, but then contradicts itself on how much development this would actually mean - it increases density but cuts back on development... how

much in each case? Would deletion of the road allow recovery of Seaside Lagoon space? The public cannot know because the DEIR does not describe it. The alternative shows no lay down of the proposed alternative. The public cannot possibly assess the impacts based on this vague description. Moles A and B are not even included in the Project Scope.

This DEIR is all over the map.

The assessments are not well supported. Some bias seems to have crept into a very shallow analysis. All but the primary alternative assess no breakwater, yet surge in the harbor, especially at Moles C and D is substantial and it would seem use of the ramps without new breakwaters would be unsafe. Also it would seem any floating docks would suffer battering that would require substantial maintenance. The assessments on other impacts like views for Mole D options are impossible to evaluate because no plan views of the resulting development are included. The hazards of the Mole D double ramp seem exaggerated. The ramp is far enough from the Basin 3 fairway to reduce risk.

And professional boat skippers could easily use the far side of the sport fishing pier without posing any danger to paddlers using the hand launch boat ramp area. Also there is the question of whether the Mole D double ramp option could be moved somewhat more south to improve the space from the sport fishing pier. Another glaring missing assessment is that of the ability to maneuver vehicles with trailers in the recommended reconfiguration. Lack of maneuvering room increases traffic congestion on project roadways and creates property and personnel safety hazards in the ramp parking areas.

In the DEIR, Mole A comes out as a winner, but the assessment does not account for impacts of moving the yacht club to Mole B. It does not seem feasible to operate the yacht club and the boat ramp, especially the two lane boat ramp from the same site.

Additionally, the yacht club removes its floating docks every winter to prevent storm damage, it does not seem there was any assessment of this in the Mole A alternatives.

This represents a project DEIR. ***The City should pick a location for a boat ramp and then THOROUGHLY assess the project against that location. It is obvious the entire description of the impacts of the alternatives are not included in the DEIR.*** Figure 1, presented in the very beginning of this document presents a substantive change to the Mole A alternative that was neither fully described nor fully assessed for impacts. The description of alternative sites and sizes of the boat ramp opens more questions than it answers.

This project DEIR description is not complete nor is its analysis thorough or consistent enough with respect to alternatives for the public to understand the project and assess its impacts.

Response to Comment PC323-95

As discussed in greater detail in Response to Comment PC323-33, CEQA states that the analysis of alternatives “shall be discussed, but in less detail than the significant effects of the project as proposed.” (CEQA Guidelines Section 15126.6(d).) While the commenter asserts that “the alternatives are spread out through each individual DEIR assessment area, making it very challenging to integrate the information,” this was not the format utilized by the Draft EIR. Draft EIR Chapter 4 provides a consolidated analysis of project alternatives spanning 432 pages, including summary tables. For clarification on the Mole D alternative, as described in beginning on page 4-301 in Chapter 4, Analysis of Alternatives of the Draft EIR, the Mole D option site design would result in a lower square footage of development as compared to the proposed project because the buildable area would be smaller (i.e., this boat launch location overlaps with Building F [Market Hall] under the proposed project). However, within that smaller buildable area, the development would be maximized to the degree feasible to meet the maximum height and size requirements allowed under the Coastal Zoning. This would result in a

developed area that has a higher floor area ratio (i.e., more building and less open area) as compared to the proposed project. The commenter faults the EIR for not providing a “lay down of the proposed alternative.” (CEQA Guidelines Section 15126.6(d).) This level of detail for the alternatives analysis was not necessary to determine the impacts of the alternatives. As discussed in greater detail in Response to Comment PC323-29, the EIR is not required to provide final designs even for the proposed project to comply with CEQA.

The commenter states that Mole A and Mole B are not included in the Project Scope. It is assumed that this refers to Chapter 2, Project Description of the Draft EIR. Mole A and Mole B are not included in Chapter 2 because they are not within the proposed project’s boundary and no elements of the proposed project would occur at Mole A or Mole B. Mole A is an alternative location of the boat ramp under Alternative 8 (see Chapter 4 of the Draft EIR). Please see Final EIR, Chapter 1 for discussion of the Staff Recommended Alternative, including Mole B. Please see Response to Comment PC323-24 above regarding the appropriateness of assessing an alternative location in a CEQA alternatives analysis.

The commenter asserts that the Draft EIR assessments are not well supported because use of the ramps without new breakwaters would be unsafe and require maintenance. 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 a reminder, the Harbor is surrounded by an existing Harbor-wide breakwater. By definition, a breakwater is a barrier built out into a body of water to protect and reduce the intensity of wave action in inshore waters and thereby reduce coastal erosion or provide safe harbourage. The City’s recent boat ramp feasibility study has determined that a boat launch without a breakwater could be safely operated at the locations studied within King Harbor; however, more frequent maintenance of the ramp (in particular the boarding floats) could be required, however these types of maintenance activities are not anticipated to affect the environmental analysis. Please refer to Master Response #8: Boat Ramp in King Harbor for additional discussion related to the siting and safety of a boat ramp in King Harbor.

For discussion of aesthetic impacts associated with the Mole D alternative, please see Draft EIR page 4-308 and 4-309. While the commenter questions whether “Mole D double ramp option could be moved somewhat more south,” CEQA states that an “EIR need not consider every conceivable alternative to a project.” (CEQA Guidelines Section 15126.6(a).) The commenter asserts that the Draft EIR did not assess the ability to maneuver vehicles with trailers in the recommended reconfiguration at Mole D. 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 D options, Figures 4-5e and 4-5f in Chapter 4, Analysis of Alternatives of the Draft EIR, shows the proposed 60-foot radius roundabout at each end of the proposed Mole D facility. The design associated with each boat launch facility option would include enough maneuvering room and based on use (e.g., one-lane with about 20 parking stalls and two-lane with about 40 parking stalls) would not increase traffic congestion on project roadways or create property and personnel safety hazards in the ramp parking areas. The comment describes Mole A as coming out as a “winner.” To clarify, the Draft EIR identified Mole A as having fewer environmental impacts as compared to the proposed project and the other alternative location (Mole D). However, there are numerous other policy considerations that a public agency may consider when determining the appropriate location of the boat launch ramp. Regarding safety at various boat ramp alternative locations, refer to Master Response #8: Boat Ramp in King Harbor. The commenter also asserts that “It does not seem feasible to operate the yacht club and the boat ramp and assets “the assessment does not account for impacts of moving the yacht club to Mole B.” The Mole A alternative in the Draft EIR expressly notes on page 4-301 that under the Draft EIR iteration of this alternative “The 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. As explained above, an “EIR need not consider every conceivable alternative to a project.” (CEQA Guidelines Section 15126.6(a).) Any subsequent modifications to the proposed project or the alternatives will be subsequently considered in light of the factors under CEQA

Guidelines Section 15088.5.

Regarding the commenter's summary statement relative to the completion of the Draft EIR description and thoroughness and consistency of the alternatives, see above and Response to Comments PC323-22 through PC323-26.

Comment PC323-96

6.4. Recreational use of Basin 3 slips

Recreational use of Basin 3 slips is significantly impacted by this development. Unless the surface parking spots in the back of the Market Hall are reserved for boaters, the boaters are forced to trek through shopping and restaurants, across active streets, and through parking structures to get their gear and guests back and forth to their boats.

The canyon created by the walling off of International Boardwalk and the development on the west side of the basin will echo the new traffic noise from the new Pacific Avenue into this echo chamber. And the limited hours of the pedestrian bridge will impact the desirability of these slips and impact safety. Boaters cannot always determine when they must return - weather, sickness, injury, shoreside emergencies, and mechanical failures can require a return anytime.

The limited hours of the drawbridge affect any boater with a boat over 10 feet high at any point. Overall, the project makes these slips very undesirable to recreational or commercial users of the Basin.

Reducing slips is obviously a negative impact on recreational boaters. While the DEIR writes off the impact by saying there are currently slips available elsewhere in the harbor, pre recession there was a multi year waiting list for a slip at all marinas in King Harbor. With the economic recovery, we should realistically expect no different.

The project proposed by the DEIR is a significant impact to recreational boaters despite the DEIR's claims to the contrary.

Response to Comment PC323-96

Regarding parking for boaters, please see Master Response #7: Waterfront Parking.

Contrary to the commenter's assertion, there would be no "canyon created" that would "echo the new traffic noise from the new Pacific Avenue into this echo chamber." As evidenced in Figure 2-8, of the Draft EIR, the vast majority of the Pacific Avenue Reconnection, extending between the intersection of Pacific Avenue/Harbor Drive and Torrance Circle, would be open to the west and not have any new building development along the west side of the road. The exceptions would be "Building E" at the north end of the new roadway and the parking structure at the south end, which, combined, would occupy only about one-quarter of the length of the Pacific Avenue Reconnection segment. Additionally, the area between the Pacific Avenue Reconnection and the east side of each building would be lined with trees/landscaping and/or it is anticipated that the east wall of each building would vary in architectural features and surface types (i.e., would not be solid/continuous smooth/reflective walls), all of which would help absorb/disperse, rather than reflect, roadway noise. A condition of approval requiring the provision of varied architectural materials and landscaping will be recommended to the project approval body as part of the conditional use permit approval process.

Although not entirely clear, the commenter seems to suggest that "development on the west side of the basin" would contribute to the alleged echo chamber effect. The eastern (i.e., nearest) edge of such development

would, however, be approximately 150+ feet from the Pacific Avenue and the “wall effect” of that development would be interrupted by the 150 foot gap that is the opening to Basin 3. Furthermore, the purpose of CEQA is to analyze the impacts of the project on the environment, not the impacts of the environment on the project. Please also see Response to Comment PC323-82 for discussion of the Recreation thresholds.

Regarding the pedestrian bridge, as described in Section 3.12, Recreation of the Draft EIR. There would be a schedule of operational assumptions for the bridge, including details on when at regularly scheduled intervals the bridge would be opened to maintain waterway access and navigation of the marina, would be posted and become part of the new lease requirements associated with the redeveloped marina. As described in Section 3.12, the pedestrian bridge would be subject to approval of a Coast Guard Bridge Permit, which would include conditions relating to the construction, maintenance, and operation of these bridges in the interest of public navigation. The authority for the Coast Guard’s permitting process is found in 33 U.S.C. 401, 491, 525-533, the International Bridge Act of 1972 and various acts of Congress. Pursuant to the Rivers and Harbors Act, “No bridge shall at any time unreasonably obstruct the free navigation of any navigable waterway of the United States.” In addition, per the Bridge Act, “No bridge erected or maintained under the provisions of sections 491 to 498 of this title, shall at any time unreasonably obstruct the free navigation of the waterway over which it is constructed.” The Coast Guards Bridge Program, which administers bridge permits, will require that the bridge operate under drawbridge operation regulations per 33 CFR 117, which establishes drawbridge operational parameters, including normal and emergency operations; specifically Section 117.40, which provides regulations associated with drawbridge opening. This may include having staff trained to operate the bridge on-site at all times, and providing boaters with a phone number to call to request the raising of the bridge outside of regular operating hours, or closing the bridge to pedestrians and leaving it in an open position during late night/early morning hours. Therefore, boats that exceed the bridge clearance would continue to have access in and out of the basin at any time of day or night. A condition of approval regarding Basin 3 access associated with the bridge will be recommended to the project approval body as part of the conditional use permit approval process. The drawbridge operation will be per Coast Guard review and approval.

As clarification on the height of boats that would be affected by the drawbridge, the vertical clearance of the bridge when closed would be up to 19.7 feet at mean lower low water (MLLW). Daily tidal fluctuations have a typical range of about 6 feet, and thus the Mean Higher High Water (MHHW) clearance (i.e., clearance at high tide) would be approximately 13.7 feet. In addition, Coast Guard navigation aids and signage, such as a “clearance board” that gives boaters information on the minimum clearance, in feet, from the water level to the bridge structure, would be posted as required by the Coast Guard.

Regarding the number of slips within the basin, please see Response to Comment PC323-73.

Comment PC323-97

6.5. Bike path usage

The bike track along Harbor Drive is complete. So the project does nothing to improve the bike path usage in this area. It does however make it more hazardous by introducing the driveway for the new parking structure and the street exit at Pacific and Harbor.

The claims of improvement of the bike path in the pier parking area are dubious. First, the bike path on the south end of the project is routed against traffic on Harbor Drive. It then continues behind the hotel and parking structure on the far side of the new Pacific Avenue with traffic, the parking structure and the hotel between the bikes and the ocean.

This route does preclude walking your bike through the pier entry, but it adds the double hazard of having to cross the new Pacific Ave twice once on the south side of the project and once on the north side where it joins

with the busy and confusing intersection of Pacific and Pacific and Harbor Drive and the new road in the harbor shopping area.

The taxpayers just spent \$4.7M to move the bike track to the west side of Harbor Drive to avoid two crossings on Harbor Drive, one would think this project would not just move that very same problem to the new Pacific Drive reconnection. The project should be redone to keep bike traffic on the west side of Pacific to avoid the double crossing.

That still does not eliminate the impact of losing views of the ocean and pier while riding behind the hotel and parking structure. And along Harbor Drive, views of the harbor and ocean are decimated by the wall of development right along Harbor Drive with the megalithic parking structure and movie theater and other shops and restaurants.

As to the secondary bike path shared with pedestrians and crossing the pedestrian bridge, that proposal is deceptive. See Figure 30. Currently bike riders cannot even ride across the entrance to the pier. Redondo Beach Municipal Code 12-2-07 prohibits it. Similarly, bicyclists must dismount near the Hermosa Pier for blocks due to the hazards of bicycling with pedestrians. Even so, this area experiences repeated bicyclist/pedestrian collisions. This is especially hazardous with children and elderly pedestrians. It is simply unrealistic to try to portray that riding bikes can coexist with pedestrians in an active shopping, dining area.

DEIR Appendix L-1, Transportation Impact Study, page 20 actually points out current shared pedestrian/bicyclist spaces where bicyclists must dismount for pedestrian safety. ***It is odd that the same DEIR ignores this safety precaution when assessing the secondary bike routes through the new project. This is yet another obvious indication of the bias that has manifested in this DEIR.***

Figure 30: Riding bike on harbor and pier pedestrian paths - not realistic, unsafe [For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Overall, the project negatively impacts bicycling with new driveway crossings, increased traffic crossing the bike track, and the odd routing to the far side of the new Pacific Avenue. At the very least, the new bike path through the hotel area should be routed to the west side of the new Pacific Ave. Any statements about the bicyclists sharing the same path as pedestrians should be removed. It is unsafe, unrealistic and deceptive.

Response to Comment PC323-97

The commenter refers to the cycle track along Harbor Drive and notes that the project would not improve bicycle usage in this area. The cycle track is primarily outside of the project boundary and thus would not be affected by the proposed project, except where the existing cycle track connects with the new bicycle path that would traverse the project site. The new cycle track and crossings will be designed in accordance with applicable design standards, and the introduction of new driveways or crossing locations on Harbor Drive or Pacific Avenue is not considered a significant impact to bicycle or pedestrian safety under CEQA guidelines.

Section 3.13, Traffic and Transportation of the Draft EIR, details bicycle 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 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. Crossings would also be enhanced through the use of appropriate traffic control signage and markings, consistent with current CA MUTCD and industry standards. Based on the discussion in Section 3.13 of the Draft EIR, the proposed project: (1) would not disrupt 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. As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact bicycle safety. Additionally, the proposed realigned bike facility would relocate some bicycle traffic from the current path through the parking facility, thereby enhancing safety. Please see Response to Comments PC333-16 and PC323-48 for discussion of views and existing conditions along the bicycle path.

As shown in Section 3.13 on Figure 3.12-7 and page 3.12-27, the proposed project includes construction of a bridge to be shared by pedestrians and bicyclist that would span the approximately 250-foot Basin 3 entrance. The pedestrian/bicycle bridge would provide a shorter direct connection between the northern and southern portions of the project site than what currently exists (along the eastern boundary of the site), which would enhance connectivity. As clarification, Section 12-2.07 of the RBMC does not prohibit bicycle riding in the pier area unconditionally, but instead prohibits bicycle riding (and skateboard riding) on the pier or other City-owned property *where posted*. 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, as allowed under RBMC Section 12-2.07. To the extent bicyclists wish to avoid pedestrian interaction, they will still have the option of utilizing the alternative bicycle path as shown in Draft EIR Figure 2-18. The Draft EIR transportation chapter (Draft EIR page 3.13-26) also acknowledges that riders through the site have to dismount to circulate through portions of the project site. That does not however mean that the project would result in a significant impact to bicycle facilities. As noted in the Draft EIR, the project provides two new bicycle paths, which eliminate the need to dismount their bicycles and the parking lot vehicular interactions which occurs under existing conditions.

Regarding the crossing of the Pacific Avenue Reconnection and request to provide a separated roadway with a bicycle path along the western edge, due to site constraints, including width limitations and the constraints of the existing topography and land uses (e.g., the retaining structure along the eastern boundary of the site supports surcharge from the multi-story residential developments buildings to the east). It would require substantial re-engineering of this portion of the project site, including substantial grading of the existing bluff, which would require relocation of the retaining wall and the support of the surcharge from the buildings above, which would result in increased construction activities and associated air quality and GHG emissions. Based on engineering considerations, it was determined to be infeasible. Crossings would be designed to be consistent with acceptable engineering standards and would provide an appropriate level of safety and mobility. The commenter's opinion is noted and the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-98

6.6. Recreational impacts of the sport fishing pier removal

The sport fishing pier in the harbor is a well loved and well used recreational asset that provides unique views, fishing inside the pier without having endanger ones self on the rock breakwaters, it provides a unique restaurant experience with local ownership and flavor, and it provides easy direct access for whale watchers and sport fishermen to board commercial vessels. Figure 31 shows a typical morning at the pier, families fishing together and waiting to get into Polly's on the Pier. The fisherman's shop on the sport fishing pier is the only shop in the harbor and pier of its kind. Neophytes can rent equipment there to get their first taste of marine sport fishing.

Figure 31: A typical morning on the sport fishing pier: families fishing together, people walking out for the view, and family and friends waiting to get into Polly's on the Pier. [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 close proximity of the pier parking lot makes this a favorite fishing spot for those who have mobility challenges. It is a favorite for families with small children just learning to fish.

Aesthetically the pier has the charm of old wooden piers. It looks like it belongs in a harbor.. and has the feel of the historic Monterey harbor but on a much smaller scale. Figure 32 shows the view of the pier from the pedestrian promenade.

Obviously, removal of the sport fishing pier is a negative impact on this recreational and open space asset on the harbor side of the development. Loss of the proximity of surface level parking will negatively impact this attraction as well.

Figure 32: The sport fishing pier provides a charming aesthetic to viewers from the pedestrian promenade and surrounding uses. [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 assessment of the condition of the pier seems to be overly negative and suspect. The Monstad Pier portion of the Horseshoe Pier and the Balboa pier are both wooden piers that have survived since the early 1900's. The sport fishing pier is decades younger and protected from heavy storm action. Maintenance and refurbishment are not even discussed, which also makes this assessment suspect.

There is no independent professional assessment of the condition of the pier. It seems a convenient excuse to eliminate the cost of maintaining this well loved asset and used recreational asset.

Loss of the sport fishing pier would be yet another negative impact of the proposed retail, restaurant, and entertainment on coastal dependent recreational uses in the harbor. The repair, refurbishment or replacement of the sport fishing pier should be mandatory under the project.

Response to Comment PC323-98

Please see Master Response #5: Sportfishing Pier, Polly's and Sportfishing, regarding the structural integrity of the Sportfishing Pier and sportfishing within King Harbor. The commenter also incorrectly asserts that the Draft EIR does not discuss "maintenance and refurbishment" of the Sportfishing Pier. Contrary to this assertion there was ample discussion of this issue in the Draft EIR, see page 3.5-19 in Section 3.5, Geology and Soils of the Draft EIR, the most recent structural inspection for the pier was performed in 2007 by Marine Tech Engineering, Inc., and found the Sportfishing Pier structure to be in decline, and specifically various pilings were found to be in bad condition (e.g., voids and worm damage), as well as the ramps and topside decking being in poor. As also discussed on Draft EIR pages 3.4-65 preservation of the existing Sportfishing Pier is not considered feasible given the poor conditions of the structure. In January 2015, Noble Consultants Inc., performed an inspection (limited to visual observations of the structural components under the deck and above the waterline) of the Sportfishing Pier. In summary, the 2015 inspection found the condition of the lower horizontal and diagonal bracing under the pier is very poor and all fender piles and at least six timber piles are also very poor. Since the 2007 inspection when these deficiencies were documented, it is estimated that additional piles beneath the footprint of the building may also now need to be repaired or replaced. Both the 2007 structural inspection and the walk through inspection in 2015 were performed by professional firms hired by the City for ascertaining the structural condition of the Sportfishing Pier.

Regarding parking for the Sportfishing Pier, see Master Response #7: Waterfront Parking.

Please see Response Comment PC323-93 regarding existing open space and open space under the proposed project. The commenter's opinion on the Sportfishing Pier is noted and the 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 PC323-82 for discussion of the Recreation significance thresholds.

Comment PC323-99

6.7. Pedestrian assessment

While the DEIR makes much ado about the pedestrian promenade, in reality other than some aesthetics, the only real improvement is the pedestrian bridge. Yet the pedestrian bridge brings with it huge maintenance and operational costs while still negatively impacting commercial and recreational boat use in Basin 3. Pedestrians can already circumnavigate the waterfront from the outer edge of the pier all the way to Joe's Crabshack today - and many do. And in two areas, the current configuration gets you closer to the waterfront than the project - in the International Boardwalk area and behind Seaside Lagoon. Clearly, the project makes it more aesthetically pleasing, but that can be accomplished without the massive overdevelopment and negative impacts represented by the project.

Response to Comment PC323-99

As discussed in Chapter 2, Project Description and Section 3.12, Recreation of the Draft EIR, the pedestrian promenade would be widened, which would increase capacity and usability as well as aesthetics. Additionally, as shown in Figure 2-20 in Chapter 2, connections throughout the site would be increased. The proposed project would also complete a missing portion of the California Coastal Trail. Pedestrian facilities would be constructed in compliance with ADA requirements, which would increase safety and mobility for all users, thus enhancing pedestrian access.

Shown on Figure 2-20 in Chapter 2, a pedestrian walkway would continue to be provided along the waterfront at the eastern edge of Basin 3 (in the existing International Boardwalk area) so pedestrians would not be further than the waterfront at this location as stated in the Comment. Along Seaside Lagoon, due to tidal fluctuations and park design considerations, it is not feasible or practical to have the boardwalk along the edge of the water, so instead the boardwalk would be at the landward edge of the beach. The path would be seaward of the development and Seaside Lagoon accessory structures and thus still afford open views of the Harbor.

The commenter's opinion of level of development and negative impacts of the project is noted and the comment will be included in the Final EIR presented for review and consideration by the City's decision-making body. Furthermore, as discussed in the City's April 8, 2008 Administrative Report on the Project's zoning:

Pedestrian-active commercial areas generally required higher FARs than auto-oriented centers...Although the Harbor area will not be a "downtown", it is intended under the General Plan for development to be reconfigured to "create a unified seaside "village", siting buildings adjacent to one another and orienting them along common pedestrian promenades and public plazas. (page 35)

In other words, 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. (April 8, 2008 Administrative Report, page 37.)

Comment PC323-100

7. Traffic, access, parking and circulation impacts

7.1. Parking

As will be shown in the sections that follow parking represents a very significant impact to existing coastal dependent recreational uses of the harbor. **The parking provided is insufficient to meet the demand and the configuration presents risks and deterrents to recreational users of the harbor.**

The project should be redesigned to prioritize sufficient, convenient, surface level parking for recreational users of the harbor area.

Though evaluated in the visual impacts section, we repeat: *the megalithic new parking structure at one of the main entrances to the harbor area represents a significant view and aesthetic impact to the whole harbor area.*

The fact that the DEIR does not evaluate or even acknowledge these blatant shortcomings and impacts is yet more evidence of the bias that has crept into this evaluation.

Response to Comment PC323-100

Comment PC323-107 is a summary of Comments PC323-101 through PC323-105 below. Please see Response to Comments PC323-101 through PC323-105. Furthermore, 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.)

Comment PC323-101

7.1.1. Parking need assessment

The parking assessment in the DEIR already admits the parking plan is over 200 space shy of Redondo requirements. While the plan increase retail, restaurant, hotel, office and entertainment development by 140%, the parking only grows by 8%. Somehow, the DEIR tries to wave this off and concludes there is no impact.

Response to Comment PC323-101

Contrary to the assertion made by the commenter in Comment PC323-101, the Draft EIR concluded there would be a significant impact to parking as discussed in under Impact TRA-1 in Section 3.13, Traffic and Transportation, of the Draft EIR. Regarding implementation of mitigation measure MM TRA-7 requiring development of a parking management plan, a parking demand study has been prepared based on the Urban Land Institute’s (ULI) methodology, which was deemed most appropriate for the project site’s proposed land uses. Refer to Master Response #7: Waterfront Parking. 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 and mitigation measure MM TRA-7 is no longer required. 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. This analysis is considered conservative because some CEQA case law has concluded the parking, in and of itself, is a matter of convenience and does not raise environmental concerns.

(San Franciscans Upholding the Downtown Plan v. City & Co (2002) 102 Cal. App. 4th 656 [‘The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact.’]) Please refer to Master Response #7: Waterfront Parking for additional information on parking. Although the project site is not required to parking off-site land uses (with the exception of the Monstad Pier), the ULI parking demand study indicated that there would be additional parking during normal periods beyond that required for the project site and Monstad Pier land uses. These extra spaces could be used to supplement the existing parking associated with visitors to off-site recreational users (such as Veteran’s Park and the County beach) south of the project site. Public parking for Veteran’s Park and the adjacent County beach is provided by a surface parking lot adjacent to the park and a single width area of diagonal parking between the beach and the park and Esplanade.

Comment PC323-102

The plan includes zero parking assessment for paddlers who own their own equipment and launch out of the Seaside Lagoon area. And it does not account for the current level of use of the Seaside Lagoon.

As mentioned earlier, the Seaside Lagoon attracts an average of 753 visitors per day. Even a conservative four visitors per car estimate yields a need for 188 additional parking spaces on an averageday, peak weeks that would jump to 304 parking spaces. Though the DEIR has no counts for paddlers using the hand launch dock, it estimates 50. At most paddlers would come 2 to a vehicle, so that is an additional 25 parking spaces required.

Neither is there any evaluation for parking for fishermen and whale watchers who board at the sport fishing pier or in Basin 3. These numbers should certainly be available from the sport fishing and whale watching commercial vessels.

These values bring the parking deficit to OVER 400 to 500 parking spaces short of realistic requirements.

Another class of pier parking structure users is totally ignored as well: those using the beach just south of the pier. As can be seen in Figure 33, the beach just south of the pier is the most populated beach area in Redondo. Due to the lack of available parking many of these beach goers park in the pier parking structure. The parking assessment does not account for these users.

Figure 33: The beach just south of the pier is one of the most populated beaches on summer weekends and holidays. Due to insufficient parking, many use the pier parking. [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 problem is many of the uses share the same peak utilization times. Weekends and particularly summer weekends and holidays will be peak days for all uses. Today the parking lots are near capacity on summer weekends. Adding over 300,000 sq. ft of additional high parking demand uses while only adding 8% more parking spaces is laughable and will create regular parking overflow conditions. While shoppers and restaurant goers have plenty of nearby options, those intending to use the harbor for recreation are out of luck.

The users who will suffer the impacts of the parking deficit the most are the coastal dependent recreational users of the harbor... another example of the commercial non-coastal dependent development negatively impacting coastal dependent recreational uses.

The parking assessment for the trailer boat ramp assesses 20 trailer parking places and 20 single spaces. As stated previously, the state design guidelines call for a minimum of 20 to 30 trailer spaces per ramp lane. It then proscribes additional single parking for guests, ADA compliant parking, and parking for wash-down. **For the pent up need in our part of the coastline, 20 trailer spots is insufficient.**

Response to Comment PC323-102

Please see Master Response #7: Waterfront Parking.

Comment PC323-103

Finally, the DEIR traffic analysis calls for eliminating parking spaces on Herondo Drive to mitigate traffic impacts of the development. However, it reserves replacement of those parking spaces to some undefined future. The replacement parking should be identified in the DEIR so that the people can evaluate the real impacts of the lost of this popular parking so close to the beach and the coastal bike path. *The DEIR is deficient in not defining this replacement parking.*

Response to Comment PC323-103

The mitigation proposed for Herondo Street establishes a performance standard for the replacement of parking spaces at a 1:1 ratio as noted on Page 3.13-69 of Section 3.13, Traffic and Transportation of the Draft EIR. As shown in Chapter 3, Modifications to the Draft EIR within this Final EIR, the mitigation measure has been clarified to include, but not limited to, providing off-street parking at the Triton Site (north of the project site, and south of Herondo Street).

Comment PC323-104

When all these exclusions are viewed in totality, it becomes clear, the lack of parking becomes a limiting factor artificially limiting access to coastal dependent recreational uses of the harbor, Seaside Lagoon Park, piers and beach in the project area. This is a blatant violation of the Coastal Act as described in the Land Use section.

7.1.2. Parking configuration

As discussed repeatedly in the recreational assessment, the consolidation of parking in the harbor area to a vertical parking structure is a deterrent to recreational uses in the harbor.

When one studies the parking analysis and square footages of the different parking structures in the project, it becomes apparent that current parking in the pier area was forced into the harbor area to accommodate the hotel and commercial development on the westward side of the pier area parking structure. Once again, this is solid evidence that the project prioritizes the commercial development over the coastal dependent recreational uses that already exist in the harbor today.

While the harbor area does have about 100 surface level parking spots, the need of recreational boaters who lease a slip, of the users of the Seaside Lagoon, of fishermen using the sport fishing pier and the sport fishing boats, and paddlers launching from the Seaside Lagoon area would demand more than this number of surface level parking spots on their own. The plan does NOT reserve these spots for these users anyway.

Thus these recreational users would be forced to fight for parking in parking structures and must traverse through the parking structures themselves with all their equipment, gear, kids, etc - in most cases they will not be able to fit their gear and equipment into the parking structure elevators. Then once they trek through the active traffic in the parking structure they must negotiate through shopping and restaurant areas, cross the active new street cutting through the harbor, across more shopping and restaurants to finally reach their intended recreation. There is very good reason marinas and harbors have ample, nearby surface level parking. While parking structures are fine for shopping centers (although data supports that most shoppers dislike parking

structures) it is a major deterrent for those who would have to lug kayaks, SUP's, fishing gear, boating supplies and their family through the parking structure and development.

Indeed, the configuration is hazardous as it exposes the risk of vehicle and equipment damage; physical injuries from carrying heavy equipment so far, hitting a pedestrian with a kayak or SUP, and the risk of crossing an active street while visibility is impeded from carrying all the gear.

The parking configuration is a real and significant negative deterrent to coastal dependent uses that exist today in the harbor area.

Response to Comment PC323-104

Regarding parking for recreational users, parking structure safety, and amount of parking provided, please see Master Response #7: Waterfront Parking.

Comment PC323-105

7.1.3. Private parking impacts

The project turns public parking into private parking. This commonly results in preferential treatment of users willing to pay more through valet parking. Valet parking would increase the accessibility impacts of those who use the pier and nearby beach for recreational uses including swimming and wading at the beach and fishing from the pier by favoring more wealthy patrons of the commercial development. Likewise, there is no discussion as to whether any of this parking would be set aside for the exclusive use of hotel guests. Typically, a hotel operator would not want their patrons to have to hunt for limited parking at one of three parking structures spread across the entire project. Allocating a significant portion of the pier parking structure to hotel uses would represent preferential treatment at the expense of those who use the parking structure to park for recreation on the pier and nearby beach.

Response to Comment PC323-105

Parking for the project site will include all the proposed land uses, including the hotel. It is expected that the reconstruction of the Pier Parking Structure would be the likely location for hotel guests and visitors to park. This is expected to include a designated valet parking area in order to maximize utilization of parking at the site. Non-valet parking within the parking structure would be for both hotel guests or members of the public. Parking at the project site would be managed by shared/overlap parking program, which would result in significantly lower than demand factor parking requirements. Any designated parking (such as for the hotel guests) would be part of that program and improved as part of the entitlement process.

Comment PC323-106

7.2 Traffic assessment

7.2.1. Blatant flaws in the approach and analysis

HCM/ICU intersection assessments assume traffic free flows into the intersection in question and is not impeded by conditions downstream of the intersection.

“The automobile methodology does not explicitly account for the effect of the following conditions on intersection operation:

- *Turn bay overflow; ...*
- *Demand starvation due to a closely spaced upstream intersection;*
- *Queue spillback into the subject intersection from downstream intersection;*
- *Queue spillback from the subject intersection into an upstream intersection;...*
- *Through lane (or lanes) added just upstream or dropped just downstream if the intersection;*
and
- *Storage of shared-lane left-turning vehicles within the intersection to permit bypass by*
through vehicles in the same lane.”²⁸

All of these conditions exist throughout the streets supporting traffic flow to, from and through, this proposed project. When interviewed at a City DEIR meeting, the consultant admitted that the city required only the basic analysis. In fact, the traffic counts do not record turn lane overflows, through lane traffic blockages, downstream flow impediments... all conditions that would be the worse at peak traffic hours.

This alone renders the traffic assessments provided in the DEIR worthless.

Response to Comment PC323-106

The Draft EIR utilized numerous methodologies to assess vehicular traffic impacts, including the Intersection Capacity Utilization (ICU or V/C) methodology for signalized intersections. (Draft EIR Section 3.13.2.3.2.) The Draft EIR also utilized Highway Capacity Manual (HCM) analysis for freeway segments, ramp queuing, and certain signalized and unsignalized intersections. (Draft EIR Section and pages 3.13-26 through 27, and 3.13-45.) HCM considers delay and queuing effects. Finally the draft EIR also utilized the Congestion Management Program (CMP) Methodology for arterials and freeways. (Draft EIR page 3.13-48.) As discussed in the officially adopted CMP, “This CMP Land Use Analysis Program has [] been structured to coincide with and be implemented through the CEQA process.” Furthermore, 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.⁶² While the commenter may disagree with the methodology employed, this does not make the Draft EIR inadequate. (See *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523 [Upholding EIR which utilized the ICU methodology and noting “the mere fact plaintiff disagrees with the methodology employed by defendant to measure the project’s potential traffic impacts on Santiago Canyon Road does not require invalidation of the SEIR/EIR.”].) The traffic counts and LOS results were also reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable. Many of the subsequent comments also request analysis based upon individualized business specific peaking characteristics (e.g. Comment PC323-108 discussing “hour class schedules at the Bay Club.”) The Draft EIR made reasonable assumptions and employed appropriate transportation methodology, and focused upon the regional AM and PM peak hours. (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.”])

While the Commenter has focused exclusively upon vehicular levels of service, it should also be noted that

⁶² 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

the State of California is slowly moving away from these metrics. As noted in Draft EIR Section 3.13.3.1, CEQA Guidance is in the process of being updated to focus upon Vehicle Miles Traveled (VMT) metrics. (Senate Bill 743, Senate Bill 375) Such an analysis was also provided for the proposed project in Draft EIR, Appendix L1 Section 6.3, which determined that the proposed project would have an average per capita VMT shorter than the regional average.

Comment PC323-107

7.2.2. Harbor Drive Configuration

While the Bike Track project along Harbor Drive is a great upgrade for bicyclists, it creates significant traffic capacity constraints that are not accounted for in the DEIR analysis.

Sharrows, road markings that encourage bicyclists to ride in the middle of a traffic lane, now exist on the through lanes of Harbor Drive and on one lane in each direction of Hermosa Avenue. Studies in Copenhagen indicate the speed of the average cyclist is 9.6 MPH. **The DEIR traffic analysis does not account for this drop in hourly lane capacity.**

²⁸ HCM 2010, Highway Capacity Manual, Volume 3: Interrupted Flow; Transportation Research Board of the National Academies; pages 18-29 and 18-30.

Response to Comment PC323-107

As shown in Draft EIR Appendix L1 on page 19, Harbor Drive was analyzed as a 2-lane north/south collector (1 lane in each direction) between Herondo Street and Beryl Street (i.e., this reflects current conditions on Harbor Drive). Existing conditions included Harbor Drive with a two-way raised median separated cycle track on the west side of the street. The commenter's assumption that bicyclists will "ride in the middle of [vehicular] traffic lane" is unreasonable during congested conditions; research indicates that bicyclists generally prefer utilizing the physically separated cycle tracks compared with shared lane facilities due to the reductions in traffic stress associated with separated facilities. Therefore, the vast majority of cyclists are expected to use the cycle track along Harbor Drive rather than the shared lane facility in congested conditions. Furthermore, the intersections along Harbor Drive are operating at LOS A or B (Draft EIR Table 3.13-14 and 3.13-28); even if the City assumed a reduction in lane capacity, this would be an insufficient change to result in a significant impact. Approximately two-thirds of the project-generated traffic is not expected to use this corridor to access the project site. Regarding traffic results associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC323-108

Short Turn Queues for road intersections - The reconfiguration of Harbor Drive has resulted in extremely short right turn queues for road intersections... optimistically most can store only 2-3 cars. And of course any trailer-vehicle combination would limit the storage capacity to one vehicle. During peak hours these turn queues already overflow into the south bound through lane of Harbor Drive blocking through traffic. For example, hourly class schedules at The Bay Club cause an inflow of traffic at Marina Drive during peak evening rush hour. Incoming members block through traffic waiting for the light. Right turn on red is prohibited due to the bike track traffic in both directions which also tends to peak on weekdays during rush hours. **The traffic study does not account for these blockages of the through lane.**

Response to Comment PC323-108

Please see Response to Comment PC323-106. Furthermore, the existing traffic counts and LOS results were reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable. Regarding traffic results associated with the proposed project, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. When traffic capacity is reduced, as the commenter alleges it has, traffic typically deviates to other corridors that are less constrained, thereby reducing traffic volumes. The traffic analysis on Harbor Drive conservatively assumed that the traffic volumes (which were collected before the implementation of the cycle track) would remain.

Traffic from the project would not turn at the locations north of the project site indicated in the comment, so are not expected to increase turn queue spillback at these locations. As for queuing, backups and other signal timing issues, these are operational evaluations that are addressed by the City on an ongoing basis. As modifications are made that may affect traffic flow, the effects are observed and reviewed and appropriate mitigations are applied. Modifications could include increase turn pocket storage length and/or adjust signal timing for protected left or right turns on Harbor Drive, overlapping right turns, and can make modifications as needed during the conditions of approval process to lengthen turning pockets, including by removing parking spaces to create/extend right turn pockets at driveways along the cycle track.

At the all-way stop-controlled intersection on Harbor Drive with driveway access to the marina, both vehicle traffic and the cycle track are stop-controlled, thereby allowing for gaps in bicycle movements that allow a steady flow of vehicles into and out of this driveway. With the project, this intersection will be signalized which would further improve driveway and intersection operations at this location.

Comment PC323-109

Zero right turn queue storage for driveway entrances - There are currently seven driveways on the west side of Harbor Drive in the project area. Figure 34 shows a typical driveway entrance. None of these driveways have any southbound, right turn lane. A single car turning into these driveways blocks traffic. The two way traffic on the bike path combined with pedestrian traffic create this situation regularly particularly at rush hour and on weekends. The busy entrances to Cheesecake Factory and the parking lot entrance near Capt. Kidd's suffer from this condition frequently. **The traffic analysis does not account for these conditions that impede the traffic capacity of the through lanes.**

Figure 34: No turn queue for southbound traffic into Tarsans Driveway. Typical of all driveways along Harbor Drive. Note sharrow behind vehicle, narrow lane, and close proximity to parking. All these conditions limit capacity. Also note how the driver favors driving on the line for the center turn lane. This is typical in this section of Harbor Drive due to the narrowness of the lane. [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 PC323-109

Please see Response to Comment PC323-106. The traffic counts and LOS results were reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable, because they conservatively account for all traffic volumes on Harbor Drive (since counts were collected before the implementation of the cycle track project). Traffic from the project would not turn at the locations north of the project site indicated in the comment, so are not expected to increase turn queue spillback at these locations. The mere fact that vehicles may occasionally need to stop

while waiting for vehicles ahead of them to turn is not in and of itself an operational impact, as it is a common occurrence on Collector roads which are designed to provide access to abutting properties. The sharrow, proximity of parking, and lane widths are all designed to typical standards, and do not have a material effect on traffic capacity.

Comment PC323-110

Conflicts for use of the center turn lane - The short distances between driveways and intersections creates conflicts for the use of the center turn lane. For example, the left turn queue to turn onto Beryl Drive heading east often blocks the ability for north bound Harbor Drive Traffic to turn into the marina parking lot driveway. Drivers wanting to make this turn must then stop in the northbound lane until the traffic clears the southbound left turn queue.

Response to Comment PC323-110

Please see Response to Comment PC323-106 and 108. The City monitors existing traffic operations and can evaluate whether there is a need to increase turn pocket storage length and/or adjust signal timing for the southbound protected left turn phase at this location, and can make modifications as needed during the conditions of approval process. The two-way left-turn lane (TWLTL) is necessary to maintain flow. Without it, left-turning vehicles would completely stop through traffic behind them when waiting for gaps. Often, a single lane in each direction plus a TWLTL has greater capacity than two through lanes in each direction.

Comment PC323-111

Northbound driveway entry challenges - The challenge of northbound vehicles trying to cross southbound traffic, bi-directional bicycle lane traffic and pedestrian traffic results in frustrated drivers pulling across the southbound lane, blocking traffic until they get a gap in bicycle and pedestrian traffic. This type of back up occurs frequently at the parking lot entrance near Capt. Kidd's.

Response to Comment PC323-111

Please see Response to Comment PC323-106 and 108. The traffic counts and LOS results were reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable. In addition, 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 the Draft EIR, which took into consideration delay and queuing effects of intersections along PCH. The City monitors existing traffic operations and can evaluate whether there is a need to increase turn pocket storage length at this location, and can make modifications as needed during the conditions of approval process.

Comment PC323-112

Conflicts for traffic turning left when exiting driveways - Again, drivers frustrated by the long wait to get a perfect gap in pedestrian, two way bicycle and two way vehicle traffic will often pull into the southbound lane of Harbor Drive blocking traffic until they can fit into a gap in north bound traffic.

Response to Comment PC323-112

Please see Response to Comment PC323-106 and 108. This is an operational issue, as are several of the previous comments, and doesn't appear to be a CEQA significant impact concern. As previously stated,

operational issues are routinely evaluated on an ongoing basis and mitigations, if appropriate and feasible, are identified. These issues are also not uncommon in many areas and are not related specifically to this project.

Comment PC323-113

These conditions not only impede the real traffic capacity of Harbor Drive, but they also represent a real safety hazard. Intensifying traffic demand in this area without addressing these fundamental issues only exacerbates both the risk and overall capacity of the roadway.

Response to Comment PC323-113

Please see Response to Comment PC323-106 and 108. The City monitors existing traffic operations and can evaluate whether there is a need to increase turn pocket storage length and/or adjust signal timing, and can make modifications as needed during the conditions of approval process.

Comment PC323-114

The new parking structure and 10x increase in harbor development will dramatically increase the traffic demand in this critically constrained area. The driveway for the new parking structure will create a new major impact unless the driveway is signalized. Even if signalized the short road segment storage capacity between the new driveway and the Beryl/Portofino Way intersection will only further impede the capacity in this area. *The traffic analysis contains zero assessment for these conditions.*

Response to Comment PC323-114

The driveway intersection associated with the proposed project will be all-way stop controlled, and located approximately 400 feet south of the existing signalized Beryl/Portofino Way intersection. This intersection spacing is adequate, to avoid traffic operational impacts associated with intersection spacing.

The project does not result in a tenfold increase in harbor development. The project represents a 304,058 net new square feet of development, representing an increase of 150 percent of development on the project site (which does not represent all of the development in the harbor area).

Comment PC323-115

7.2.3. Short Road Segment Impacts

Key ingress and egress roads from this development suffer from critically short road segments. During heavy demand, these segments fill to capacity and prevent more vehicles from entering the segment during their green light. This often results in residual vehicles stuck blocking through lanes until the downstream signal changes to let the short segment clear. These short segments occur on Beryl between Catalina and Harbor Drive, Torrance Blvd between Catalina and Broadway and between Broadway and PCH, and on northbound PCH between Catalina and 190th/Herondo. Figure 35 shows an example of a short road section that limits intersection capacity.

While these overflowing intersection conditions are the definition of gridlock, the traffic analysis does not account for these conditions in either the upstream or downstream intersections impacted. This leads to an artificially inflated LOS grade for an intersection.

Figure 35: Example of short road segment at PCH and Herondo/190th. Note segment storage overflow

into intersection of Catalina and PCH. These conditions are not reflected in the traffic analysis. [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 PC323-115

Please see Response to Comment PC323-106. The traffic counts and LOS results were reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable. In addition, in response to Caltrans requirements, a 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 of intersections along PCH. At the location indicated in the comment, the intersections of Pacific Coast Highway & Herondo Street /Anita Street and Pacific Coast Highway & Catalina Avenue are coordinated, so queue spillback from the northern intersection that would affect eastbound left turns from Catalina Avenue onto Pacific Coast Highway is typically cleared concurrent with the Catalina phase. Typical operations at these intersections are adequately reflected in the analysis.

Comment PC323-116

7.2.4. Summary of real conditions that were not factored into the traffic analysis

Figure 36 summarizes the real road conditions that negatively impact traffic capacity of the project area but that were not accounted for in the traffic analysis.

<i>Driving along</i>	<i>Entering</i>	<i>Direction</i>	<i>Turn Movement</i>	<i>Queue Storage</i>	<i>Limitations</i>
<i>Harbor Drive</i>	<i>Yacht Club Way</i>	<i>South Bound</i>	<i>Right Hand Turn Lane</i>	<i>2 - 3 cars</i>	<i>Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic</i>
<i>Harbor Drive</i>	<i>Tarsans/Boatyard Drive Way</i>	<i>South Bound</i>	<i>Right Turn Main Lane</i>	<i>0 cars</i>	<i>Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic</i>
<i>Harbor Drive</i>	<i>Marina Way</i>	<i>South Bound</i>	<i>Right Hand Turn Lane</i>	<i>2-3 cars</i>	<i>Extremely Narrow Lane, Frequent turn lane overflows blocking through traffic, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic</i>

Harbor Drive	Port Royal Marina Parking	South Bound	Right Turn Main Lane	0 cars	Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic
Harbor Drive	Shade Hotel Entrance	South Bound	Right Turn Main Lane	0 cars	Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic
Harbor Drive	Cheesecake Factory Entrance	South Bound	Right Turn Main Lane	0 cars	Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic
Harbor Drive	Port Royal Marina Parking	South Bound	Right Turn Main Lane	0 cars	Extremely Narrow Lane, any right turns block through traffic waiting for bikes/peds, Left turns from northbound lane often block southbound lane waiting for bike/ped traffic
Harbor Drive	Portofino Way	South Bound	Right Hand Turn Lane	2-3 cars, 1 car/trailer	Extremely Narrow Lane, wide turn needed for vehicles with trailers Frequent turn lane overflows blocking through traffic
Harbor Drive	New Parking Structure Entrance/Exit	South Bound	Not Available	Not Available	If not signalized, similar limitations to other non signalized intersections
Harbor Drive	Southern Parking Entrance	South Bound	Right Turn Main Lane	0	Significant blockages due to left turns from northbound lane/ Pacific often block southbound lane waiting for bike/ped traffic, any right turns block through traffic waiting for bikes/peds
Harbor Drive	Port Royal Marina Parking	North bound	Left Hand Turn Lane	Variable	On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl, dangerous negotiating southbound vehicle and bikes and peds from both directions, frequent stops across south bound lane

Harbor Drive	Cheesecake Factory Entrance	North bound	Left Hand Turn Lane	Variable	Dangerous negotiating southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane
Harbor Drive	Shade Hotel Entrance	North bound	Left Hand Turn Lane	Variable	Dangerous negotiating southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane
Harbor Drive	Port Royal Marina Parking	North bound	Left Hand Turn Lane	Variable	Dangerous negotiating southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane
Harbor Drive	Tarsans/Boatyard Drive Way	North bound	Left Hand Turn Lane	Variable	Dangerous negotiating southbound vehicle and bikes and peds from both directions, frequent stops across southbound lane
Harbor Drive	Beryl St	South Bound	Left Hand Turn Lane	Variable	On heavy days, frequent conflict for lane with South bound traffic trying to run onto Beryl
Beryl Drive	Catalina	East Bound	Segment	18 cars through, 2-3 vehicles left and right onto Catalina, conflicts for center lane turns into hotel and Salvation Army	Heavy conflict with center turn lane for Redondo Hotel and Salvation Army, Total segment length less than 400 feet, Can only hold 18 cars in through lane (less with trailers), 2 to 3 cars in either turn lane. Entire segment fills on busy days.

<i>Beryl Drive</i>	<i>Harbor</i>	<i>West bound</i>	<i>Segment</i>	<i>18 cars through, 18 vehicles right onto Harbor, conflicts for center lane turns left onto harbor,</i>	<i>Heavy conflict with center turn lane for Redondo Hotel and Salvation Army, Total segment length less than 400 feet, Can only hold 18 cars in through lane (less with trailers) and right turn lane, 2 to 3 cars in left turn lane. Entire segment fills on busy days. Frequently blocks all access to Salvation Army and Redondo Hotel from eastbound turns</i>
<i>Catalina</i>	<i>Pacific</i>	<i>North bound</i>	<i>Left Hand Turn Lane</i>	<i>3- 4 cars, 2 vehicles with trailers</i>	<i>Extremely dangerous turn across two lanes of Catalina south Bound, short distance to intersection adds risk</i>
<i>Pacific</i>	<i>Catalina</i>	<i>East Bound</i>	<i>Right Turn Only</i>	<i>NA</i>	<i>Extremely dangerous stop unsignalized intersection, short distance and poor sight makes turn risky, frequent illegal le< turn lanes by tourists who did not know it was right turn only</i>
<i>Torrance Blvd</i>	<i>Catalina to Broadway</i>	<i>East Bound</i>	<i>Segment</i>	<i>2-3 cars left and right turn</i>	<i>TOTAL SEGMENT ONLY 300 FEET ONLY - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light</i>
<i>Torrance Blvd</i>	<i>Broadway to PCH</i>	<i>East Bound</i>	<i>Segment</i>	<i>5 cars left turn</i>	<i>TOTAL SEGMENT ONLY 300 FEET ONLY - only 13 through cars per lane x 2 lanes. Frequently fills both lanes on heavy days. Turns from Broadway east onto Torrance from both sides block platoon movement. Will not likely resolve with signal light. Vehicles desiring to go north on PCH often get blocked out from left turn lane due to through queue blocking entire turn lane - causes full signal cycle delay. Left turn lane can overflow onto through lane blocking</i>

PCH	Catalina to 190th	South Bound	Segment	27 cars thru to north, 8 east turn	Choke point when PCH goes to two lanes on northbound side
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Figure 36: Significant road segments, intersections, and driveway impediments ignored for in the DEIR traffic assessment. DEIR assessment artificially optimistic.

Response to Comment PC323-116

Please see Response to Comment PC323-106, PC323-108 and PC323-112. Please also see Appendix X-2 of Draft EIR Appendix L1 (which has been updated in the Final EIR Chapter 3) for the lane geometry assumptions for all analysis scenarios and study area intersections. The traffic counts and LOS results reflect existing conditions and were reviewed to determine if upstream or downstream queuing affected the counts or the LOS results. Based on that review, the traffic analysis was determined to be reasonable. In addition, in response to Caltrans requirements, a 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 of intersections along PCH.

Comment PC323-117

7.2.5. No weekend analysis

The vast majority of land uses proposed in the project and existing today generate their peak traffic on the weekends. ITE Trip Generation Tables show dramatic increases for movie theaters, retail and restaurant uses on weekends - up to a 51% increase in trips for Saturday Peak hour (see Figure 37). Recreational boating, paddling, sportfishing, Seaside Lagoon attendance, and whale watching uses all increase on the weekend. **The fact that the traffic analysis does not include weekend traffic counts and assessments represents a huge hole in the traffic assessment.**

Comparison of weekday to weekend trip genera/on							
ITE Land Use	Land Use Descrip/on	Size	Units	TOTAL WEEKDAY (DEIR)	TOTAL SATURDAY*	WEEKDAY PEAK (DEIR)	SATURDAY PEAK*
820	Retail	97	KSF	6,658	9,064	587	857
444	Theater	700	seats	1,260	1,568	49	322
931	Quality Restaurant	128	KSF	11,514	12,032	959	1,385
932	Hi Turn Restaurant	45	KSF	5,722	7,127	443	633
310	Hotel	130	rooms	1,062	1,365	78	113
710	Office	60	KSF	662	148	89	26
TOTAL:				26,878	31,303	2,205	3,336
Percentage increase from weekday DEIR analysis:					16%		51%
*All values derived from ITE Trip Genera/on Tables, 9th Edi/on							

Figure 37: Comparison of weekday trip generation to weekend trip generation shows dramatic increases in traffic at a time PCH in Hermosa is constrained to two lanes in each direction

Concurrent with this peak traffic generation, bicycle and pedestrian traffic will peak as well. And traffic constraints of the main arterial, PCH, through Hermosa Beach are impacted as the arterial is constrained to two lanes in each direction all day on weekends.

Clearly, the DEIR is deficient in not evaluating weekend traffic generation and impacts of this huge development.

Response to Comment PC323-117

Regarding weekends, please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As also discussed in Response to Comment PC323-130, the City Charter's analytical requirements under Article XXVII (Measure DD) are not the same as CEQA, and not currently applicable. Nevertheless, please be aware that the commenter was one of the sponsors that submitted Article XXVII to the City for a vote, and the provisions of the City Charter section that the commenter proposed expressly state that the City should use a weekday analysis. More specifically, City Charter, Article XXVII, Section 27.2(c)(1) states "For purposes of determining traffic increases...baseline and projected ICU and LOS conditions shall be determined considering *weekday peak hour conditions at such time of the year when local public schools are in session.*"

Comment PC323-118

7.2.6. Cumulative impacts

As mentioned in a previous section, the traffic analysis ignores known projects that would have a significant cumulative impact on traffic. These include:

- The new General Plan Update for Hermosa Beach that adds over 600,000 sq. ft of commercial development in close proximity to the project
- The Sketcher Headquarters Expansion
- The AES property reuse - Measure B should be used as an upper limit for assessment

Others have been noted as well in the Cumulative Impacts section. For example, the reconfiguration of Shade Hotel requires offsite parking and valeting of cars. This impact has not been assessed.

The traffic study should be reaccomplished accounting for these known upcoming projects.

Response to Comment PC323-118

Please refer to Master Response #2: Cumulative Impacts, which addresses the requirements and methodology associated with the cumulative impacts analysis. As for the considerations for the AES Power Plant Site relative to the proposed project, please refer to Master Response #1: AES Power Plant Site. Also, refer to Response to Comment PC323-38.

Comment PC323-119

7.1.2. Traffic Impact Study Comments

While the previous sections describe blatant shortcomings of the traffic analysis that render its results worthless and artificially optimistic, we will include some other flaws in our assessment of the traffic impact study.

Response to Comment PC323-119

Please see Response to Comments PC323-120 through PC323-130.

Comment PC323-120

7271. Table 8 existing V/C values do not correlate with those of Table 6.

Response to Comment PC323-120

In Appendix L1, Table 8 presents the V/C and LOS results for *Existing* and *Existing* plus Project scenarios. Table 6 presents the V/C and LOS results for the *Cumulative* without Project scenario. Consequently, these tables should not have the same information.

Comment PC323-121

7272. The study states it relies on Shade Hotel traffic analyses. The configuration of Shade Hotel parking has changed in a way that will impact traffic significantly, particularly in the Portofino/Harbor Drive intersection. The new configuration has Shade Hotel valeting cars back and forth between the hotel and a new parking lot off of Portofino Way on the former Triton Oil site. This will effectively double traffic and increase turn traffic onto and out of Portofino Way.

Response to Comment PC323-121

Please see Response to Comment PC323-38.

Comment PC323-122

7273. The study states it uses current pedestrian and bicycle traffic counts. The development should dramatically increase both types of traffic especially since the traffic study also reduces traffic trips due to the mixed use nature of the development.

Response to Comment PC323-122

Please see Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Please also see Draft EIR Section 3.13, Impact TRA-3 for discussion of pedestrian and bicycle impacts, which were determined to be less than significant. Furthermore, the Draft EIR expressly notes that there is sufficient capacity to accommodate the added pedestrian volumes...” (Draft EIR page 3.13-81.) Pedestrian crossings along the Pacific Avenue Reconnection will provide sufficient capacity to accommodate the added pedestrian volumes based on the design of these facilities. Furthermore, the project includes numerous additional pedestrian and bicycle paths in comparison to existing conditions. As noted on Draft EIR page 2-34, under existing conditions “there is limited pedestrian and bicycle access within the project site, including non-contiguous walkways that extend along the water’s edge...” As shown in Draft EIR Figure 2-19 and 2-20, the proposed project’s modifications include numerous new alternate pedestrian and bicycle pathways.

Due to the mixed-use nature of the project site, internal and external pedestrian trips will be generated. However, the increase in pedestrian and bicycle facilities that the project will provide, designed to meet current design standards, will adequately serve the additional demand that would be generated by the project

as it is dispersed through the project site.

Comment PC323-123

727A The trip length assessment does not make sense. It assesses that the trip lengths will be relatively short. The City says it the current development underperforms because it is not getting enough patronage, and their stated intent is to attract customers from nearby cities. It cites employment statistics from a relatively short radius as the justification for short trips. If this number of local employees are available today, the harbor should be more successful without the dramatic increase in development proposed by the project. For the development to be successful at this scale, it will have to draw customers from a much wider draw area and this would result in increased trip lengths.

Response to Comment PC323-123

Contrary to the assertions in the comment, the Draft EIR objective states “Reestablish a vibrant Waterfront destination that serves the local community and attracts residents and visitors...” (Draft EIR Section 2.2.) Appendix L1 Section 6.3 of is titled “VEHICLE MILES TRAVELED ESTIMATE/AVERAGE TRIP LENGTH EVALUATION” and states:

To evaluate total VMT for the Project, the average vehicle trip length for various trip types for the Project site TAZ were obtained from the both the SCAG travel demand model and for the entire City of Redondo Beach from the California Household Travel Survey (CHTS) as a means to validate the SCAG model average trip length. Due to the proposed Project’s mix of uses, Project-related trips are expected to encompass home-based work trips, home-based other trips, and non-home based trips. For this reason, the average trip length for all trip types was selected for analysis with Project trips. The SCAG model average trip length of 8 miles was selected for the VMT estimates, because it is longer than the 6.6 miles average trip length of the CHTS data, so would represent a conservative estimate of daily VMT.

The commenter incorrectly states that “for the development to be successful at this scale, it will have to draft customers from a much wider draw area.” As determined by the market study prepared for the proposed project (Appendix O of the Draft EIR), the primary project patronage - residential market and employee market - within a 10-minute and 5-minute drive, respectively. This is approximately within a 1.3 to five mile area. In addition, throughout the Waterfront entitlement process the City has heard from many citizens who have stated that they do not visit the project site under existing conditions (or tell visitors not to visit the project site) due to the degraded nature of the facilities and because they feel unsafe, and consequently travel greater distances to other destinations in Hermosa Beach and elsewhere in Los Angeles County. With the proposed improvements, the City anticipates that some of those individuals will visits the Waterfront Project. This is supported by Comments PC225, PM1-18, PM1-19, PM1-21, PM1-25, PM1-29, PM1-30, PM2-06, PM2-09, PM2-26, PM2-28, and PM3-09, PM3-10, and PM3-15, to name a few.

This methodology was also recently upheld by the Court of Appeal in *Friends of King River v. County of Fresno* (2014, 5th District Court of Appeal Case No. F068818) (Slip Opinion page 55):

“Delivery trucks are an aspect of the Proposed Project that may result in a regional reduction of GHG emissions. By placing a source of aggregate, ready-mix concrete, and asphalt in a location where supply does not currently meet demand the Project will result in a reduction in VMT [vehicle miles traveled] for customers. It is expected that many of the Proposed Project’s customers will be located within a 30 to 60 mile roundtrip distance from the Proposed Project. In the absence of the Proposed Project, a portion of these customers would otherwise have to travel to Coalinga to obtain these materials, at a

roundtrip distance of approximately 120 miles. This reduction in distance traveled for customer vehicles would result in a corresponding reduction in GHG emissions...”

Comment PC323-124

727.5. Analyzing the impact of the reconnection of Pacific Ave on intersection utilization, it appears that the heaviest use of the new street would be to service through traffic from the north side of the project. According to Figure 2 in the Traffic study, 100% of Harbor Drive Southbound traffic that currently turns east on Beryl diverts to going straight through to the south.

This new connection is advertised as being required to connect the two sides of the project, but the traffic allocation model does not reflect that at all. The new road generates significant and unavoidable noise impacts. If the road is largely used for through traffic, then the impact can be mitigated by deleting the road.

Providing a new route for cut through traffic is not desirable. It creates unnecessary impacts and just moves congestion problems. The results of the traffic modeling show we should delete the new road connection

Response to Comment PC323-124

As discussed on page 12 in the Appendix L1 traffic study of the Draft EIR, the Pacific Avenue Reconnection will result in the background shift of volumes from Catalina Avenue to Pacific Avenue. The amount of vehicles shifted was developed based on the evaluation of the two select zone assignment analyses, as well as the Market Study. While the Pacific Avenue Reconnection would provide connectivity between the northern and southern portions of the project site and a direct link between Pacific Avenue/Harbor Drive and Torrance Circle, there may be vehicles that utilize Pacific Avenue as a through segment. However, traffic impacts along Harbor Drive were not found, as discussed in the Section 3.13, Traffic and Transportation of the Draft EIR. Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project with regard to traffic impacts and mitigations.

Furthermore, as mentioned in Section 5.5.2 in Chapter 5, Other CEQA Considerations of the Draft EIR, although the proposed project includes roadway improvements, specifically the new main street and Pacific Avenue Reconnection, the roadways would serve local traffic within an existing highly developed/urbanized area.

Alternative 5 – No Pacific Avenue Reconnection presented in Chapter 4, Analysis of Alternatives addresses a project alternative that does not include the Pacific Avenue Reconnection. As identified by the commenter and discussed in Chapter 4, the elimination of the Pacific Avenue Reconnection would reduce the significant unavoidable noise impact, associated with traffic noise. However, as discussed in the impact analysis beginning on page 4-168 and summarized on table 4-63 beginning on page 4-426, overall this alternative would result in greater impacts than the proposed project, including slightly increased impacts to traffic operations on Catalina Avenue and fewer benefits associated with emergency vehicle, pedestrian, and bicycle access through the project site. Approximately 35 percent of project trips are anticipated to access the project site from Torrance Boulevard, and would enter parking facilities at this location, and some of which would use Pacific Avenue. 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.

As discussed in Draft EIR Section 4.6, while there may be some noise benefits associated with Alternative 5, “there are different tradeoffs for each alternative and resource area (e.g., while some alternatives would reduce

impacts compared to the proposed project, some of the project's benefits would not be implemented)." (See also Draft EIR Table -63.) The decision to accept or reject a potential alternative will be considered by the decision makers at the time of their deliberations; such actions will also include preparation of CEQA findings.

Comment PC323-125

7276. The traffic volumes for Harbor Dr/Pacific Ave appear twice (20 and 35) and the drawn configuration, reported counts and future projections make no sense. In intersection 20, Harbor Drive and Pacific are not a cross intersection. The peak hour existing volumes for the turn movements make no sense. It would have us believe that the south bound Harbor Drive traffic makes 134 evening turns onto the non existent westbound Pacific Drive. Intersection 35 shows a western leg of Pacific Drive with a T intersection to Harbor Drive... this does not exist. If the intersection is meant to be the Catalina and Pacific Ave intersection, the traffic counts seem low for through traffic on Catalina (0 in the southerly direction).

Response to Comment PC323-125

Intersection #20 is the intersection of Pacific Avenue & Harbor Drive, with Pacific Avenue treated as the north/south movement. Specifically, the north leg is Pacific Avenue, the south leg is the entrance to the parking lot, the east leg is the entrance to condominiums, and the west leg is Harbor Drive. Labeling on the Appendix X-2 figures was fixed for clarity.

Intersection #35 is a three-legged intersection where Harbor Drive is the north leg, the west leg is the entrance to Cap't Kidd's Fish Market, and the south leg is Pacific Avenue. Labeling on the Appendix X-2 figures have been updated for clarity, as shown in Chapter 3, Modifications to the Draft EIR in this Final EIR.

Comment PC323-126

7277. Trip Generation

The methodology for determining new trip generation is fundamentally flawed. It takes *some* of the existing uses and calculates their trip generation from ITE Trip generation tables. It then takes the project trip generation for some uses, subtracts the future from the current and uses that number to base the rest of the future analysis on. ***This approach understates the traffic growth.***

The City has repeatedly complained that our harbor and pier are underperforming. If they are underperforming, they should be generating fewer trips than successful uses would. Using trip generation tables to characterize current traffic would then over predict current traffic. Subtracting the over predicted current traffic from the future traffic projection would result in artificially lowering the expected traffic growth.

The proper way to make this assessment is to bound the current project area key intersections. Use current traffic counts for the current traffic. The future traffic generation should be calculated for all the uses that will reside in that same area after project completion. That results in a realistic assessment of traffic impact.

The current methodology understates traffic growth and that then is perpetuated and magnified in the intersection capacity utilization and LOS analyses resulting in under predicted traffic impacts.

Response to Comment PC323-126

Baseline intersection volumes are based upon traffic counts which were conducted in 2013 and 2014, as described in Draft EIR Section 3.13.2.3.1. However, it is not feasible to utilize counts for existing trip

generation, because the counts include other people and facilities in that area which are not a part of the proposed development or existing structures. Existing and proposed trip generation rates were described in detail, starting on Draft EIR page 3.13-41 and Appendix L1, Section 4.1. As discussed on page 40 of Appendix L1 of the Draft EIR, the traffic analysis did not assume that all of the existing leasable space was occupied, as implied in the comment.

The amount of active uses (defined as a land use that was open for business with an active lease at the time traffic counts were collected), varied between the two dates. Fewer uses were active in the summer of 2013. Because fewer uses were active in the summer of 2013 ~~then, and so~~ the resulting existing trip generation credit for uses to be removed ~~and~~ would be smaller (and so the resulting new-new Project trips would be higher), the active uses of summer 2013 were used to calculate the existing trip generation credit (a conservative assumption). (Draft EIR, Appendix L1, page 40.)

CEQA would have allowed for the City to utilize the higher historical trip generation for the existing uses (when site occupancy was higher); however, the City elected to use the conservative assumptions discussed above. (*North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94 [Upholding CEQA traffic baseline which utilized conditions when the mall was fully operational seven years earlier, instead of the vacant conditions at the time the EIR was prepared.]) Furthermore, the trip generation calculations did not rely solely upon the ITE rates referenced in the comment. As discussed in Appendix L1, “the model starts with ITE 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.”⁶³

The comment also states that “future traffic generation should be calculated for all uses that will reside in that same area after project completion.” The Draft EIR also included a cumulative traffic analysis which includes growth factors for surrounding land uses; please see Response to Comment PC323-38 for additional details.

Comment PC323-127

7.2.7.8.Reasonableness Check - Reconnection of Harbor Drive to Torrance Blvd.

The model appears to have some basic flaws. Analyzing one intersection for example, Harbor/Portofino (intersection number 15), highlights those flaws. The intersection is a key access point to the new 161,000 sq ft parking structure and about 100 surface level parking spots for the north side of the project, plus the traffic for the new boat ramp, plus the traffic for the valet parking for Shade Hotel entering and leaving the new parking lot on the north side of Portofino Way (the former Triton Oil site). This area of the harbor, according to the DEIR will go from 48,399 sq ft of primarily commercial development on the ground today to a whopping 290,297 sq ft of commercial development. That is a 600% growth in the development. And that is going from what the city describes as poor performing current development. Yet this intersection does NOT see the same relative growth in trips into this area of the harbor.

DEIR Figure 4 shows the new traffic generated by the project allocated to this intersection. There is a significant amount of traffic going down Portofino Way from southbound Harbor Drive and westbound Beryl. Yet despite 6x the growth in harbor development, the new parking structure and the new boat ramp, not a single new vehicle trip turns into Portofino Way from northbound Harbor Drive. From this

⁶³ 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)

assessment, reconnecting Harbor Drive to Torrance Blvd appears to have little utility from a project. Likewise, only 66 additional vehicle proceed straight through the intersection toward the pier. ***This does not seem to justify the great expense and unavoidable impacts of the new Pacific Ave reconnection.***

This situation is exacerbated when looking at DEIR Figure 8 for the same intersection. While the project only generates 66 new vehicle trips through Harbor to the south (figure 4), the through trips of the project plus cumulative impacts jumps to 452 vehicles (Figure 8) from 186 vehicles today (DEIR Figure 1). ***This shows that the vast majority (75%) of the increased traffic, 200 new trips, southbound through this intersection are purely through trips.***

This conclusion is further substantiated by comparing the westward traffic counts of Beryl at Harbor.

Although the Harbor area has 6x the growth, the total west flow for all movements only goes up by 4 vehicles. Examining the turn movements shows a dramatic drop in the northbound turns from Beryl. And this drop is offset by a dramatic rise in through traffic from south to north through the intersection. At the same time the turn traffic into Portofino way represent no gain from current turn traffic, just 11 vehicle.

Again, analysis shows that the new connection primarily serves through traffic.

The reconnection of Harbor to Torrance has just made the harbor a new arterial south. This negatively impacts recreational uses of the harbor by impact access.

Again, the minor benefit (66 cars) to the project does not justify the dramatic increase in harbor area traffic and the significant and unavoidable noise impacts to Basin 3, Hotel guests and the boaters in Basin 3.

Response to Comment PC323-127

The comment has artificially narrowed the geographic scope of the project and ignores many of the factors utilized in the traffic analysis. As shown in Draft EIR Table 2-1, existing total development on the project site equates to 219,881 square feet of building area and the proposed project will result in an increase of 304,058 square feet. Additionally, the traffic analysis utilized the *gross leasable area* as the preferred metric for trip generation, as described in Appendix L1, page 40, not the gross building area value utilized in the comment (i.e., 48,399 square feet). Additionally, as discussed on Draft EIR page 3.13-44, “Existing (2013) plus Project” conditions considers several factors including “trip generation and trip distribution analyses” and modifications associated with Pacific Avenue Reconnection. While the northern portion of the existing site may only contain 48,399 square feet of existing *gross building area* (Draft EIR Table 2-1), that does not mean that the existing trip generation through northern intersections (such as Intersection #15) is exclusively associated with the northern structures, as assumed in the comment. For example, existing visitors from north of the project site may travel south through Intersection #15 on their way to the southern portion of the project site, or alternatively, may park on the northern portion of the project site to visit international boardwalk or Horseshoe Pier (which fall within the southern portion of the project site). Similarly, vehicle trips originating from the south attempting to access the northern portion of the site have several options for accessing the northern portion of the site via the three alternative entrances along Harbor Drive that provide access to the northern portion of the site (and would therefore not travel through Intersection #15-the northern boundary of the project site). The traffic analysis assumed that northbound trips would access the site from the closer entrances along Harbor Drive. Vehicles accessing Mole A from the south were assumed to use Catalina and PCH to head north and access the site from Beryl Street and Portofino Way.

As discussed on page 12 of the Appendix L1 traffic study in the Draft EIR, the Pacific Avenue Reconnection will result in the background shift of volumes from Catalina Avenue to Pacific Avenue. This shift of traffic from Catalina Avenue to Harbor Drive will have a positive effect on residential livability on Catalina Avenue. Traffic that normally used Catalina Avenue to access Torrance Boulevard (and then head east or onto Pacific

Coast Highway) will now stay on Pacific Avenue, which is within the project limits. The amount of vehicles shifted was developed based on the evaluation of the two select zone assignment analyses, as well as the Market Study. While the Pacific Avenue Reconnection would provide connectivity between the northern and southern portions of the project site and a direct link between Pacific Avenue/Harbor Drive and Torrance Circle, there may be vehicles that utilize Pacific Avenue as a through segment. However, traffic impacts along Harbor Drive were not found, as discussed in the Draft EIR. Please see Section 3.13, Traffic and Transportation of the Draft EIR, and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project with regards to traffic impacts and mitigations. Furthermore, as mentioned in Section 5.5.2 in Chapter 5, Other CEQA Considerations of the Draft EIR, although the proposed project includes roadway improvements, specifically within the new main street and Pacific Avenue Reconnection, the roadways would serve local traffic within an existing highly developed/urbanized area. The majority of the project’s traffic distribution (approximately 67 percent as shown in Appendix X-2 within Appendix L1 of the Draft EIR combining project-trip distribution on Torrance Boulevard and Portofino Way) would access the project site from an east to west movement. Most of the remaining 33 percent of project trips would access the site via Harbor Drive from the north. For updated traffic distribution figures, refer to the updated Appendix X-2 in the Final EIR Chapter 3.

The analysis in the comment also ignores the fact that the land use mix are not the same between the proposed project and existing conditions, and as such generate differing levels of trips during the peak hours relative to daily trips. Because of the differing land use mixes, the internalization and other trip calibrations associated with the site are different and are refined by the MXD model, “which through the statistical processes of the model, calibrates the ITE rates to reflect the site specific and area contexts of the project, including the mixture of uses, site and area demographics, accessibility to other land uses, such as adjacent residential, availability of transit service, pedestrian connectivity, and other factors.” (Draft EIR page 3.13-41.) Some of these factors change between existing conditions, and conditions with the proposed project. Additional details regarding the MXD model are provided in Appendix X-1 to Appendix L1. Please also see Response to Comment PC323-126 related to the comment that current development is “poor performing.”

Comment PC323-128

But that is not the only oddity when analyzing this intersection. With the 600% increase in development and the primary access to the new parking structure, Shade Hotel parking lot, new boat ramp, and the surface level parking in the harbor area of the project being off of Portofino way, the traffic entering and leaving Portofino Way as assessed in DEIR Figure 8, shows an unbelievably low increase in trips.

<i>Movement</i>	<i>Current Traffic (DEIR Figure 1)</i>	<i>Traffic with project and cumulative impacts (Figure 8)</i>	<i>Increase</i>
<i>West on Portofino from southbound Harbor</i>	<i>39</i>	<i>116</i>	<i>2.9x</i>
<i>West on Portofino across Harbor Blvd</i>	<i>113</i>	<i>203</i>	<i>1.8x</i>
<i>East on Beryl across Harbor Dr</i>	<i>118</i>	<i>271</i>	<i>2.3x</i>
<i>West of Portofino from northbound Harbor Dr</i>	<i>11</i>	<i>11</i>	<i>0x</i>

The low multiplier in trips into and out of Portofino does not make sense in light of the dramatic increase in development and uses in this part of the harbor.

Response to Comment PC323-128

While not identified, the commenter does not appear to be referencing Draft EIR Figures 1 or 8, but instead appears to be referencing figures in Appendix X-2 of Draft EIR Appendix L1. The majority of the project's traffic distribution (approximately 67 percent as shown in Appendix X-2 within Appendix L1 of the Draft EIR combining project-trip distribution on Torrance Boulevard and Portofino Way) would access the project site from an east to west movement. Most of the remaining 33 percent of project trips would access the site via Harbor Drive from the north. The traffic analysis showed there would be 782 net new trips in the PM peak hour and as shown in Figure 3 of Appendix X-2 of Appendix L1 in the Draft EIR, 65 percent of project trips were estimated to utilize this intersection (Study Intersection #15 – Harbor Drive and Portofino Way/Beryl Street). The commenter does not present all of the movements where project trips would be located. When accounting for all project movements, the project is projected to have a total of 495 vehicles utilizing this project during the PM peak hour as seen in Figure 4 of Appendix X-2 of Appendix L1 in the Draft EIR. Please see Response to Comment PC323-38 for additional details related to Shade Hotel and surface parking, which are both located north of Portofino and are not components of the project, consequently, they were included in the "Cumulative (2019) Conditions *Without Project* scenario," as described on Draft EIR pages 3.13-43 through 44. Please also see Response to Comment PC323-127 for discussion of methodology. For an updated Appendix X-2, please refer to the Final EIR Chapter 3. Figure 8 provided by the commenter (Draft EIR Figure 2-8), which consists of a conceptual illustration of the project site is discussed above in Response to Comment PC323-30.

Comment PC323-129

And that is only further exacerbated by another factor that would increase traffic....increased internal trips caused when the surface parking is full. This can be seen at any mall. Most drivers want to park as close as possible to their end destination. And certainly, the vast majority of guests will want to avoid the parking structure. This will drive visitors to first drive through the surface level parking along the new internal street prior to trying the parking structure. In most malls, this is not a big traffic impact on key access roads, cars will just circle within the parking lot and/or parking structure without reentering a street. Here, when the few surface parking spots are full, a visitor must leave the internal street and return via Harbor Drive northbound to return to the parking structure crossing southbound Harbor Drive traffic. This obvious, predictable, and inevitable traffic is not incorporated into the model results.

A basic practice by engineers using models is to validate the model against common sense. Here the model results do not stand up to simple common sense assessment. It is obvious that even beyond the under predicted trip increase, the trip and turning movement allocations of the model under state the realistic impacts of this project. The traffic analysis and modeling needs to be reaccomplished.

Response to Comment PC323-129

Parking will be provided to meet expected parking demand, and will also account for additional parking space capacity beyond estimated parking demand to accommodate parking turnover. Additionally a shared parking demand study has been prepared for the project site and is described in Master Response #7: Waterfront Parking and corrections to the Draft EIR have been made as detailed in Chapter 3, Modifications to the Draft EIR within this Final EIR, so the extra traffic the commenter indicates will be generated by limited parking is not expected to occur. Additionally, the project would provide guide signs throughout the area and a real-time

information system identifying the availability of parking spaces at the various parking locations, so patrons can determine where parking is available on the project site (and therefore would not need to drive between parking facilities searching for spaces).

Comment PC323-130

7.2.7.9. Comparison to Related Traffic Assessments

The 2009 Traffic Element Assessment specifically modeled the Measure G zoning that resulted in the current project. The assessment of 2030 traffic with this added zoning is dramatically different than that assessed here. Figure 38 shows this assessment. It concludes much more serious impacts on intersections for which this project defines no mitigations. The rippling affect of the errors of the DEIR assessment become apparent in this comparison.

Figure 38: Circulation Element traffic analysis shows much greater impacts²⁹ *[For the figure included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR.]*

When Measure G zoning was put on the ballot, the city did a much more detailed and formal assessment and again even with proposed mitigations, the results are much worse than the DEIR assesses. See Figure 39.

TABLE T20 AS-BUILT PLUS PROJECT CONDITIONS WITH MITIGATIONS INTERSECTION LEVELS OF SERVICE AND IMPACT ANALYSIS (ICU METHODOLOGY)													
Intersection	As-Built Conditions				As-Built plus Project Conditions with Mitigations				As-Built plus Project Conditions with Mitigations Impact				
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	Change in VC	Sig Impact	Change in VC	Sig Impact	
1. PCH & Anita/Hernando Street	E	0.924	E	0.917	E	0.951	F	1.153	0.027	Yes	0.236	Yes	
2. PCH & Catalina Avenue	B	0.673	E	0.931	B	0.689	E	0.999	0.016	No	0.068	Yes	
4. PCH & Beryl Street	D	0.856	E	0.953	E	0.901	F	1.038	0.045	Yes	0.085	Yes	
5. Catalina Avenue & Beryl Street	A	0.390	B	0.636	A	0.550	E	0.967	0.160	No	0.331	Yes	
7. PCH & Torrance Boulevard	D	0.893	E	0.907	D	0.873	E	0.909	-0.020	No	0.002	Yes	

Note: Bold italics indicate ICU improved by mitigation measures

Figure 39: Measure G specific traffic assessment. This further supports that the DEIR analysis is flawed significantly.³⁰

²⁹ City of Redondo Beach Circulation Element, 2030 Traffic Assessment, November 2009

³⁰ Measure G Supplemental Ballot Information, City of Redondo Beach; November 2, 2010

Response to Comment PC323-130

As discussed in detail in Response to Comment PC323-127, the EIR for the Waterfront project analyzes a specific development project, and uses a number of refined methodologies to address the impacts of this specific project.

The commenter is first referencing the traffic analysis prepared pursuant to Article XXVII⁶⁴ of the City Charter from six years ago for Ballot Measure G. As an initial matter, the Article XXVII analysis was prepared for a broad set of Local Coastal Program amendments (not a specific development project) and addressed impacts of a significantly greater area in comparison to the proposed project. The Measure G Article XXVII analysis encompassed maximum theoretical development on (1) the 62.2 acres of the Harbor Pier area (400,000 square feet of net new trip generating uses assumed, which was comprised of 365,000 square feet of development under ITE trip generation rate 820, and 35,000 square feet of government office ITE trip generation rate 730), (2) the 52 acre AES Power Plant (new 24.7 acre public park assumed with ITE trip generation rate 412), and (3) the 21.1 acre Catalina Avenue Corridor area (540,215 square feet of net new trip generating development assumed). The purpose of the current Waterfront EIR is to analyze the reasonably foreseeable impacts from the currently proposed Waterfront project, which encompasses an area much smaller than the 62.2 acre Harbor Pier area and a specific development project.

Furthermore, the methodology provided by Article XXVII and CEQA are not the same, and contain differing requirements. Most notably, Section 27.4(b) of Article XXVII which provides that “If a site specific development is proposed in connection with a major change in allowable land use, and densities or intensities of use in such site-specific development are less than the densities or intensities the major change proposes, the text of the ballot shall clearly disclose the maximum total residential, commercial, industrial or other nonresidential buildout potential, and traffic impacts under buildout, compared to the as built condition.” Based upon these provisions, the City has previously analyzed development in its Article XXVII analyses at the maximum theoretical intensity (i.e. Floor to area ratios/height) or density (dwelling units per acre).

However, the purpose of CEQA is to analyze “reasonably foreseeable” development of the proposed project, not to assume maximum development theoretically allowed under zoning. (See CEQA Guidelines Section 15064(d), 15358.) As discussed in *Sierra Club v. County of Tehama* 2012 WL 5987582 (3rd Dist. Case No. C066996), maximum theoretical “Buildout calculations [for the Countywide General Plan update] do not take into account site-specific constraints, economic factors, market forces, and regulatory requirements imposed by local, state and federal agencies...Unlike a project-level document where the direct effect of a project on population growth can be determined, in this instance the 2008-2028 General Plan as a policy document can only suggest where growth would be appropriate, and rely on market forces to determine when or if that growth will occur.”]. In *County of Tehama* the Court upheld an EIR prepared pursuant to CEQA based upon Department of Finance growth projections, rather than theoretical capacity allowed under the zoning/general plan. (See also *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1 [Reasonably foreseeable future development for planning amendments based upon questionnaire to wholesale wineries regarding their likelihood of converting to boutique wineries].) Consistent with this methodology, the current Waterfront EIR analysis utilized SCAG population growth projections for the purposes of its cumulative analysis; see Response to Comment PC323-38. Please also see Master Response #2: Cumulative and Master Response #1: AES Power Plant Site.

The most recent Kensington Article XXVII analysis demonstrates the significant dichotomy between these two

⁶⁴ Article XXVII analyses are only required for legislative amendments associated with General Plan and Local Coastal Program. (City Charter § 27.2(f).) The Waterfront Project does not involve any such legislative amendments.

methodologies. For the Kensington project the applicant had proposed to construct a two-story 80,000 square-foot Assisted Living Center project, which was therefore considered the reasonably foreseeable amount of development for that project's EIR (and ultimately approved by the City Council). However, because of the requirement from Section 27.4(b) of the City Charter, the Article XXVII traffic analysis for the Kensington project assumed development of 440,391.6 sq. ft. (maximum theoretical development up to the three-story height limit on the 3.37 acre site).⁶⁵

The commenter also references the traffic analysis prepared the City's Circulation Element. While this circulation element is dated "November 2009" it was prepared in 2007, nearly a decade ago.⁶⁶ Furthermore, the Circulation analysis, referenced in the comment, analyzed City-wide full buildout, which is not considered reasonable foreseeable. As discussed on page 21 of the Circulation Element, "the 2030 analysis of traffic congestion in Redondo Beach assumes that all land uses have been developed for maximum trip generation...this full buildout is highly unlikely" and assumed a 37 percent increase in average daily traffic between 2007 and 2030, which yields a 1.6 percent annual increase over a 23 year period. The City of Redondo Beach has not seen such a continued annual growth rate of traffic. For example, in 2007, the Intersection of Pacific Coast Highway and Torrance Boulevard had a V/C ratio of 0.893 and 0.907 in the AM and PM peak hour, respectively.⁶⁷ In 2014, that intersection had a V/C ratio of 0.818 and 0.848 in the AM and PM peak hour, indicating that operating conditions have improved over the seven year period. Since the preparation of the Circulation Traffic Analysis, the Southern California Association of Governments (SCAG) has prepared its Regional Transportation Plan or RTP (pursuant Senate Bill 375) and SCAG's associated traffic model and growth projections. One of the overriding goals of SB 375 and the SCAG RTP is to "promote the development of better places to live and work through measures that encourage more compact development, varied housing options" and providing for reduced reliance upon personal vehicles, reducing the number of trips and reducing the length of those trips. These planning concepts of providing compact urban infill development reduce VMT and are being implemented throughout the County.⁶⁸ Consequently, as discussed on Draft EIR pages 3.0-5 and 3.13-43, the City utilized the SCAG population growth rate for the purposes of the Waterfront traffic analysis. 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 City's use of SCAG *population* growth rate is considered conservative because SCAG is projecting a *2 percent reduction in traffic* at its forecast year of 2035. Lastly, the current Waterfront DEIR traffic analysis is based upon actual traffic counts from 2013 and 2014 (Draft EIR page 3.13-13); consequently it is unreasonable to rely upon the less accurate Circulation Element traffic projections for the time period between 2007 and 2014.

⁶⁵ Kensington Assisted Living Project Article XXVII Traffic Analysis p. 2 available online at: <http://www.redondo.org/civica/filebank/blobdownload.asp?BlobID=29903>

⁶⁶ As discussed in Response to Comment PC323-28, the commenter has previously asserted that the City should not utilize traffic analyses that are five years old.

⁶⁷ Redondo Beach Circulation Element, November 2009, Table 3 page 19.

⁶⁸ Los Angeles County is seeing a large number of mixed-use projects being proposed and approved as contemplated under SB375. This includes but is not limited to (1) numerous mixed use projects in Santa Monica, including approval of (a) a 57 unit mixed use development, (b) a 49 unit mixed use development with 45,039 square feet of commercial space, (c) a 56 unit mixed use development with 28,869 feet of commercial space. (2) a mixed use project in Westlake with 600 units and 26,000 square feet of neighborhood-serving commercial. (3) Korean American seven-story mixed-use building with 103 market-rate apartments above the museum, (4) Ivy Station in Culver City with 500,000 square feet of offices, apartments, a hotel, stores and restaurants, (5) Pasadena Parsons Project "mixed use urban village" featuring 620,000 square feet of office use, 30,000 square feet of which could be used as retail space, plus 10,000 square feet of restaurant space and 475 residential units, including work/live units, (6) Los Angeles Playa Vista Development, the last phase of which includes 2,600 residential units, 200 independent/assisted-living homes, more office space, a second resident club and new parks and open space, and 200,000-square-foot shopping center. The City of Redondo Beach also recently approved the 52 residential unit and 10,000 sq. ft. mixed-use development at 1914 PCH, also known as the Sea Breeze project.

Comment PC323-131

7.2.7.10 Circulation Safety Assessment

Public safety response - The DEIR highlights that the reconnection of Pier and Harbor would facilitate faster public safety response times. The enhancement is overblown. The fire department is represented on both sides of the development area. The fire station at Pearl and Broadway is in close proximity to the pier and hotel area down Torrance Blvd and using access ways to the top level Hotel parking. There is only one more intersection down Torrance Blvd to reach the harbor area. There are also fire and lifeguard personnel on Mole C in close proximity from the harbor side.

The police patrol an area on either side of the development and the police station is on Diamond very close to the harbor. The pier side currently maintains a police station and the project plan calls for a replacement for this station.

So there is little time impact from the lack of connectivity between the two streets currently and the situation would not change significantly with the project, were the project to exclude the reconnection.

The reconnection may actually impede response time. The new Pacific Avenue does not appear to have any shoulder. And it has no center turn lane. It is often bounded by development and walls on both sides. With heavy through traffic in both directions and a stop sign and a bike path crossing at each end, emergency response trying to use this route could easily be stuck while the traffic clears. There is no way to use a center turn lane to split the traffic, a shoulder for drivers to pull over, and no way to turn around or exit the narrow roadway once you are in it.

Response to Comment PC323-131

Facilitating emergency access across the site to improve public safety was considered in the planning for a vehicle connection between the northern and southern portions of the site. The commenter's disagreement with these benefits does not affect the significance conclusions in the Draft EIR. The commenter is correct that emergency services can be provided to the site from both the north and south, but without a direct link providing emergency vehicle between the north and south, there may be a delay in the response. Also, a single emergency route prevents reasonable access in the case of a closure of the single access route.

Regarding fire services at the project site, as described in Section 3.11, Public Services of the Draft EIR, Fire Station 3 at Mole D is primarily a Harbor Patrol facility and it has limited fire suppression equipment and staff, and fire boat at Fire Station 3 is operated by staff from Fire Station 1 (requiring the staff from Fire Station 1 to get to Fire Station 3 before the boat can be used). Therefore, a fire fighting response anywhere on-site would primarily come from the southern portion of the project site.

Regarding police access, as described in Section 3.11, the commenter is correct that an off-site response could come from either side of the development, but the on-site officers cannot not quickly travel from one end of the project site to the other to respond to an emergency under existing conditions. The proposed Pacific Avenue Reconnection would facilitate access and improve response times.

The commenter asserts that the reconnection may actually impede response time. The commenter provides no support for this conclusion. Even if the reconnection were completely congested, emergency services would not differ in comparison to existing conditions (i.e., conditions without the Pacific Avenue Reconnection). Furthermore emergency vehicle access along the Pacific Avenue Reconnection would meet minimum specifications for roadway widths pursuant to City of Redondo Beach and Fire Code requirements. A two-

lane roadway with no on-street parking would typically be a minimum 24 feet wide. With vehicles pulling to the side to allow emergency vehicle passage, that would leave approximately 10 feet in the middle of the roadway for emergency vehicle passage (seven-foot width of stopped vehicles on both sides of the roadway).

With operation of the proposed Waterfront project traffic is expected to flow reasonably along the Pacific Avenue Reconnection. The intersections near the Pacific Avenue Reconnection are anticipated to operate with minimal delay during peak hours under cumulative with project conditions. As shown on Table 3.13-28 and Table 3.13-30 in Section 3.13, Traffic and Transportation of the Draft EIR, the intersections at Harbor Drive and Pacific Avenue (Intersection #20 and Intersection #35) would operate at a level of Service A, as would the intersection of Catalina and Torrance (Intersection #25) south of Pacific Avenue Reconnection as shown on Table 3.13-28. Regarding the potential for the stop sign and crosswalk to impede emergency vehicles, as with any signalized or unsignalized intersection and crosswalk within the California, pursuant to the California Vehicle Code, vehicles are required to yield right-of-way to emergency vehicles sounding a siren and exhibiting a red light, and pedestrian are required to proceed to the nearest curb or place of safety until the authorized emergency vehicle has passed. Therefore, the Pacific Avenue Reconnection would provide an improved emergency vehicle access as compared to existing conditions, and no significant impacts would occur.

The commenter indicated that the Pacific Avenue Reconnection will have “heavy through traffic.” The reconnection is expected to shift some through traffic off of Catalina Avenue (thereby reducing through traffic on that street and providing a slight traffic operations improvement). However, the through volumes that shift, though they account for more traffic on the reconnection than the project is expected to generate, (e.g., 385 shifted southbound PM peak hour trips at intersection 35, compared with 40 project trips), as shown in Figure 2 and 5 in Appendix X-2 (which has been updated in the Final EIR Chapter 3), this level of traffic is modest and can easily be accommodated with the capacity as planned on the facility.

Comment PC323-132

8. Biological Impacts

Redondo Beach’s Local Coastal Program includes specific restrictions on trimming or removing trees with nesting birds that represent protected species. Multiple local bird watchers have reported violations of these restrictions, but Redondo seems to ignore the reports.

Here is a published report that appeared as a letter to the editor in The Beach Reporter, July 15th, 2015:

Tree trimming troubles

It is a violation of state and federal law to trim or cut trees or shrubs while night herons and great blue herons are nesting, but there are regular violations of these laws in the South Bay. Two years ago, palms on the Esplanade were “trimmed” drastically after the night herons had nested. Young herons not yet able to fly fell to the ground and were killed by cars or dogs within a day or two. A few herons returned to the Esplanade last year. More arrived this year. I am concerned that the “trimming” will begin again soon.

There has also been illegal trimming of palms in Portofino and King Harbor while the great blue herons are nesting. After the first trimming in Portofino this year, one pair of herons relocated to palms closer to the ocean. After a few weeks, these palms and only these palms were trimmed. It is clear then that the herons were being targeted. Last week, in King Harbor, three adjacent palms in

which a pair of great blue herons was nesting were cut drastically.

So who trimmed the trees? The city of Redondo Beach? King Harbor? The homeowners on the Esplanade? It would be good to know so they can be advised not to do so again during nesting season. If the problem is bird poop on cars, then put up signs advising drivers that they may want to use car covers as coastal birds nest here.

Elizabeth Courtenay Manhattan Beach

Given the observed track record, local bird enthusiasts do not trust the city or CenterCal to protect these birds that are a true asset of our harbor area. **The DEIR should detail how the City and CenterCal will survey, document, and report the trees to be impacted by construction prior to construction and during construction as nesting season arises.**

Response to Comment PC323-132

As described in Section 3.3, Biological Resources, of the Draft EIR, the proposed project must comply with Section 10-5.1900 of the Redondo Beach Municipal Code, which specifies tree trimming and tree removal requirements for trees in the coastal zone. This comment addresses a regulatory compliance issue and does not introduce new environmental information. However, a condition of approval requiring compliance with the City's tree trimming ordinance will be recommended to the project approval body as part of the conditional use permit approval process. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-133

9. DEIR Alternatives Assessment

The combination of land use alternatives combined with the options for boat ramp locations creates too many combinations and permutations to be adequately assessed.

Looking at just the basic land use alternatives, the alternatives assessment is flawed due to the faulty impact assessment of the DEIR. Once the impact assessments of the proposed project are reasonably and more accurately represented, the comparison of alternatives should be reaccomplished.

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

Response to Comment PC323-133

Please see Response to Comment PC323-33 for the alternatives methodology. Please also see Response to Comment PC323-35 regarding the analysis of the boat ramp alternatives.

The impacts assessment was prepared in accordance with the requirements of CEQA. See Responses to Comments PC323-2 through PC323-139 herein that address the specific issues raised by the commenter.

Please see Response to Comment PC323-23 regarding the adequacy of the Project Objectives.

Comment PC323-134

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.

Response to Comment PC323-134

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. However, as discussed under CEQA Guidelines Section 15126.6(a) an "EIR need not consider every conceivable alternative to a project."

Comment PC323-135**10. Summary, Recommendations, and Conclusions****10.1. Summary**

The analysis of the DEIR reveals the following:

- a large number of impacts to coastal dependent commercial and recreational uses that were understated or missed by the DEIR
- a large number of combinations and permutations of options and alternatives that are not fully vetted or explained
- significant impacts of some alternatives are not assessed and fall outside the defined project area
- several key analyses are flawed and/or missing, many conclusions are drawn without substantiation and do not stand up to scrutiny

10.2. Recommended Alternatives

This project is broken. The city and developer are trying to pack too much development into too small a site. When the impacts are reasonably evaluated, it becomes obvious.

Response to Comment PC323-135

This comment is summary of specific issues raised in greater detail in the comments above. Please see Response to Comments PC323-2 through PC323-134.

Comment PC323-136

With the AES site available for redevelopment and the lease renewal for King Harbor Marina nearing, an integrated plan for the entire waterfront should be developed including the entire harbor and pier area, the AES property, the power line right of way, and properties bordering AES and the right of way (the dirt farm, bank, mini storage, etc.)

Response to Comment PC323-136

Please refer to Master Response #1: AES Power Plant Site.

Comment PC323-137

Spreading revenue generating uses across this entire area could fund the infrastructure improvements without all the negative impacts in the harbor.

However, given that city has repeatedly refused to take this logical and most efficient, effective and least impactful path, we submit several Harbor Pier alternatives for evaluation. The basic objective of these alternatives is to revitalize the waterfront and expanding and balancing recreational and commercial uses with the negative impacts.

10.2.1. Alternative A

- Infrastructure refurbishment and upgrades, no reconnection of Pacific
- Pier and current Parking structure similar - repurpose octagonal pad for public open space or institution (aquarium, museum)
- Harbor
 - Eliminate parking structure
 - Expand park to Joes Crabshack site
 - Explore non-profit for Newport Aquatic Center (NAC)- like facility
 - Leave Seaside Lagoon disconnected explore alternative water features (pool)
 - Reduce development increase to 50,000 sq. ft, revamp International Boardwalk
 - Construct 2 lane boat ramp on Mole D with 40 parking spots
- Refurbish sport fishing pier
- Bring in tall ship
- Scrap the bridge and refurbish Basin 3 marina

10.2.2. Alternative B

- Infrastructure refurbishment and upgrades, no reconnection of Pacific
- Pier and current Parking structure similar - repurpose octagonal pad for public open space or institution (aquarium, museum)
- Harbor
 - Eliminate parking structure
 - Expand park to Joes Crabshack site
 - Explore non-profit for Newport Aquatic Center (NAC)- like facility
 - Leave Seaside Lagoon disconnected explore alternative water features (pool)
 - Reduce development increase to 50,000 sq. ft, revamp International Boardwalk
- Refurbish sport fishing pier
- Bring in tall ship
- Construct 2 lane boat ramp on Mole A with 40 parking spots
- Move KHYC to Mole B (if parking for other uses not impacted)
 - Move Moonstone park to Joe's Crabshack site and connect with expanded Seaside Lagoon

Response to Comment PC323-137

CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in the draft EIR. Rather, as set forth in CEQA Guidelines Section 15126.6, "the range of alternatives required in an EIR is

governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice.” An EIR is also not required to consider multiple variations on alternatives or alternatives to components of a project (*Village Laguna v. Board of Supervisors* (1982) 134 Cal.App.3d 1022); *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993). As discussed in the Village Laguna case, “there are literally thousands of ‘reasonable alternatives’ to the proposed project... But, no one would argue that the EIR is insufficient for failure to describe the alternative [suggested in the comment letters].” Indeed earlier comments from the commenter (Mr. Light) have asserted that there are too many alternatives. (Comment PC323-133.)

The alternatives analyzed in the EIR represent a full range of potential impacts from the project. This allows the decision-maker and the public to see the effect of approving the project or a potential alternative to the project (including an EIR alternative or a variation on an EIR alternative or the proposed project, including variations put forth in the alternatives suggested by the commenter).

With the exception of moving the King Harbor Yacht Club to Mole B (discussed below), the components of the suggested alternatives are similar to Draft EIR Alternative 2 – Necessary Infrastructure Improvements, which addresses infrastructure improvements only and replace of the Pier Parking Structure with a similar structure, Alternative 3 – Landside Development Only, which addresses modifying Seaside Lagoon without opening the lagoon and no implementation of a pedestrian bridge or replacement of the Sportfishing Pier, Alternative 5 – No Pacific Avenue Reconnection which, as the name implies, would not implementation the roadway reconnection, and Alternative 7 – Reduced Density, which addresses reduced development at the project site.

It should be noted, that as discussed on page 3.5-19 in Section 3.5, Geology and Soils of the Draft EIR. Given the number of piles that ultimately need to be repaired or replaced on the Sportfishing Pier, at least one-half of the building and pier would end up needing to be removed. Therefore, refurbishing the pier, would essentially translate to nearly total demolition and replacement of the existing structure.

It should also be noted that exploring an alternative water feature for Seaside Lagoon (i.e., pool) may be contrary to Comment PC323-62 above, where the commenter implies that the current configuration of Seaside Lagoon is coastal dependent use that should remain as is, or expanded.

Regarding moving King Harbor Yacht Club to Mole B, relative to the scope of the proposed project, and the need for additional environmental review should that occur, see Master Response #8: Boat Ramp in King Harbor.

Comment PC323-138

Conclusions

- The project definition is not mature enough for a Project Level DEIR
- The DEIR shows obvious bias toward the development
- The DEIR analysis is significantly flawed and much of it needs to be reaccomplished with better project maturity and definition
- The proposed project violates the Coastal Act and Redondo General Plan and Local Coastal Program
- The project represents significant impacts to existing coastal dependent recreational and commercial uses of the harbor

- The project represents megalithic development on the waterfront. The harbor takes an unfair brunt of the development as the development is increased by 1000%
- The reconnection of Torrance Blvd and Harbor Drive primarily serves through traffic while causing unavoidable and significant noise impacts to existing residential development, hotel guests and boaters in Basin 3.
- The proposed land swap with the State Lands Commission is not in the best interest of the People of California
- The project and the alternatives prioritize commercial development at the expense of existing coastal dependent recreational and commercial uses of the harbor

The wide implications of the project alternatives (particularly the boat ramp alternatives), the demonstrated significant impacts on coastal dependent harbor uses, the upcoming lease renewal for King Harbor Marina, and the change in AES property status all for the City to go back to the drawing board and develop an integrated plan for the entire waterfront.

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

Response to Comment PC323-138

This comment is a summary of the issues raised in greater detail in Comments PC323-2 through PC323-137. The issues raised are addressed in Response to Comments PC323-2 through PC323-137.

Comment PC323-139

Comment PC323-139 includes the following reference material as cited in the comments above:

[For the materials included in the comment letter, please refer to the CD of the attachments to the comment letter following this letter in Volume II of the Final EIR]

- 1. APPENDIX A: CITY RESPONSE TO SEASIDE LAGOON PUBLIC RECORDS REQUEST**
APPENDIX B: DEIR Water Quality Responses from City of Redondo Beach
Appendix C: City Public Records Act Response to Harbor Village Traffic Analysis
Appendix D: City Public Records Act Response regarding Seaside Lagoon Park
Appendix D: City Public Records Act Response regarding Seaside Lagoon Park

Response to Comment PC323-139

Comment PC323-138 consists of copies of public records requests to the City and the documentation provided in response, as referenced in the comments above. It does not introduce new environmental information, nor does it directly challenge information presented in the Draft EIR. The comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC323-140**Appendix E: Referenced Documents Provided Separately**

- Heart of the City Final EIR
- Measure G Ballot Supplement
- City of Redondo Beach Circulation Element
- City of Redondo Beach Parks and Recreation Element
- Measure B Text
- City of Hermosa Beach, Plan Hermosa Briefing
- CA Department of Boating and Waterways, LAYOUT, DESIGN AND CONSTRUCTION HANDBOOK FOR SMALL CRAFT BOAT LAUNCHING FACILITIES

Response to Comment PC323-140

Comment PC323-139 is a list of materials that were referenced in comments above and provided to City via email. It does not introduce new environmental information, nor does it directly challenge information presented in the Draft EIR. The comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

The documents attached to the comment letter are available upon request at the City Hall City of Redondo Beach, Community Development Department, 415 Diamond Street, Door 'E,' Redondo Beach, California 90277.

COMMENT LETTER NO. PC324**ALAN HAMMER**

Comment PC324-1

My wife and I own a condo in 140 The Village, facing the ocean. This project, if completed, will directly impact us. I attended the 1/9/16 meeting about it and have the following comments:

It seems very likely that building heights of 44-66 feet will block our view of the ocean.

Response to Comment PC324-1

Please refer to the Master Response #9: Views and Scale of Development. As for building heights, the commenter is mixing 'elevation' and 'height of the buildings.' Although the proposed tallest structure at the site may be 61 feet in elevation, which is measured from zero/sea level, as detailed in Section 3.9, Land Use and Planning of the Draft EIR, zoning at the project site requires that building heights be measured from the sidewalk grade at Harbor Drive. Therefore, the height of the tallest structure being proposed is 45 feet. There are no 66-foot tall buildings proposed as suggested by the commenter.

Comment PC324-2

Having Pacific go through will undoubtedly increase long-term traffic (and thus noise) on that street. Our condo directly faces Pacific.

Response to Comment PC324-2

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. The analysis presented in Section 3.10 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 (not adjacent to the commenter's residence). Please see Response 264-1 regarding roadway noise along Pacific Avenue.

Comment PC324-3

I was not convinced by the discussion that opening the Seaside Lagoon won't result in more pollution.

Response to Comment PC324-3

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 PC324-4

As to a matter apparently not in the report, but mentioned by numerous speakers, it seems to me to be ill-conceived in economic terms. The fifth biggest shopping center in America is about 2 miles away. What major tenants will want to locate in this project and not in Del Amo and if already in Del Amo will want another outlet in this project? Which shopper will come here instead of there?

Response to Comment PC324-4

Chapter 5, Other Environmental Considerations and Appendix O of the Draft EIR detailed the potential for urban blight and the economic viability of the proposed land uses at the site. Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site for a summary of the projects ability to attract patrons.

Comment PC324-5

I'm from Chicago where, despite much greed and corruption in that city, great parts of the Lake Michigan waterfront are ineligible for commercial development. The Burnham plan states that the waterfront belongs to all the people. That apparently can't happen here, but maintaining building and traffic density, rather than increasing it, seems like a desirable goal.

For these reasons, we oppose the project or any variation of it which does more than maintain and refurbish the existing arrangement.

Response to Comment PC324-5

The commenter states an opinion/preference; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC325**MATT MARBLE**

Comment PC325-1

Please reconsider the development of the Redondo Beach Pier. Not only does this redevelopment destroy so many of my childhood memories, it will fundamentally change the feel of the beach area in Redondo. There are other ways to attract visitors to the pier than to remodel the whole thing into a modern structure. We're in a world of mini malls and chain restaurants. Please keep the pier 'as is' and as a symbol of Redondo's heritage.

Once it's gone, you can't replace or rebuild the history.

Response to Comment PC325-1

The commenter states an opinion/preference; your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC326**CHARLIE TRUJILLO**

Comment PC326-1

I would like to express my concern over the destruction of a coveted venue called Tony's on the Redondo Beach Pier. Tony's is a nationwide tourist attraction due to its old nautical vintage charm. Many enthusiasts in the States and abroad will make a point to stop in for dinner or cocktails to enjoy the "original" interior design and architecture while viewing the sunset. Every time I visit Tony's the place is packed. The upstairs area during sunset is packed with people with only standing area available because all of the tables and seats are taken.

There is a wide audience and tiki culture that exists and will be truly disappointed to have this one of a kind relic demolished. I assure you many will not take this loss of a treasure lightly. There will be many write-ups that will criticize this decision. Unfortunately, in so many cases, city officials who make these decisions are not aware of the cultural significance and may not appreciate something "old" as something unique or special in their city. They may see it as junk to tear down. I am just writing to you in hopes to bring awareness that many care about the fate of Tony's and my letter will not be the last that will be heard in the Redondo community and beyond.

My only suggestion would be to fund Tony's for any restoration it needs to preserve its original designs to remain stable for the future.

Response to Comment PC326-1

Please refer to Response to Comment PC312-1 above. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC327**LUIS VASQUEZ-AJMAC**

Comment PC327-1

Sorry, I am was out of town and just saw your add in the EasyReader, please let me know, if you still need help.

Since I moved here in 2007, my family and I have enjoyed hanging out at Polly's and going on whale watching trips from the little pier.

We do not need a mall in paradise. Right?

Response to Comment PC327-1

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. PC328

WAYNE TODDUN

Comment PC328-1

Please put me down as a concerned member of the Redondo Beach community regarding the Pier that Polly's is on. We really need to keep historical locations like this one. I'm also a local employer in the community.

Response to Comment PC328-1

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. PC329

JESSICA TRAVIS

Comment PC329-1

I am a 28 year old resident of Redondo Beach and have lived here since I was 5 years old. I love this city and hope that the Waterfront Project becomes a reality soon. I have attended 2 DEIR public meetings so I could learn more about the CenterCal project. What I really like is that there will be a beautiful place with more recreational activities to participate in, along with a better bike path and ocean access.

Response to Comment PC329-1

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

COMMENT LETTER NO. PC330

**MELANIE COHEN – SOUTH BAY
PARKLAND CONSERVANCY**

Comment PC330-1

Please acknowledge this submission. Thank You.

The South Bay Parkland Conservancy's goal is the preservation of open space throughout the South Bay. The South Bay is park poor* with Redondo Beach averaging 2.35 acres per thousand people. This figure includes the beaches. National park land is 12.9 per acre and a recommended federal level of 10 acres. Parkland is important to the health and well-being of all residents. The Conservancy supports environmentally friendly causes that foster open space, clean air and reduction of greenhouse gases, and reduced and reclaimed water uses.

*per Federal and Trust for Public Land recommendations

The information currently available to evaluate this project is inadequate. There are no three dimensional renderings or even an architectural rendering to support this particular project. Based upon the information available, the South Bay Parkland Conservancy respectfully asks the following questions be addressed fully before any project may be considered:

Response to Comment PC330-1

Comments received and noted. The commenter opinion is noted; please see Responses PC330-2 through PC330-8 for additional details. 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.” (See also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final project design does not need to be completed at the time of project approval/EIR certification.]) Please also see Response to Comment PC323-29 for additional details.

The video prepared by CenterCal (available at <http://www.thewaterfrontredondo.com/the-plan.php#video>) also 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 peer reviewed 3D computer model.

Comment PC330-2

- 1) Land Use/Planning: The plan does not give any information on what would be considered publicly delineated space for physical activities such as walking, running, gathering, sitting, biking. Will pedestrians and bikers alike be able to access the harbor and adjacent pier areas without restraint? Will there be any accommodation for a public gathering space or park as requested by Redondo Beach residents in the 2005 advisory vote? Will this development adhere to State Lands Commissions rules? How will the California Environmental Quality Act be impacted?

Response to Comment PC330-2

The proposed public 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). Throughout the Draft EIR, and in particular Chapter 2, Project Description, figures (such as Figures 2-19 through 2-21) and text (Section 2.4 beginning on page 2-41) describes how the proposed project would include several enhanced circulation areas for pedestrians and bicyclists, and a Seaside Lagoon, which would be open year round.

The comment also asks whether the project “would adhere to State Lands Commissions rules.” The comment discusses an issue associated with statutory compliance, which does not constitute a physical impact on the environment; consequently, no response to comment is required. Nevertheless, please note the proposed land exchange would be subject to review and approval by the State Lands Commission (see Section 3.9, Land Use and Planning of the Draft EIR). As discussed on Draft EIR page 3.9-29:

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.

The commenter asks "how will the California Environmental Quality Act be impacted." The proposed project does not modify the California Environmental Quality Act, which was adopted by the California Legislature. (Pub. Res. Code Sections 21000 et seq; Tit. 14, Cal. Code Regs. Sections 15000 et seq.) The 2005 Advisory Vote (Measure J) referenced in the comment is unrelated to the project site. More specifically, the advisory vote, referred to different property which was "bounded by Pacific Coast Highway, Catalina Avenue, Beryl Street, Harbor Drive, and Herondo Street" (also referenced as the AES Power Plant and the Catalina Corridor). Please see Master Response #1, AES Power Plant Site for additional details regarding the Local Coastal Program amendments to the AES property after the 2005 advisory vote.

Comment PC330-3

- 2) Air Quality: Based upon the size of the development for the project, up to 12,550 car trips per day could occur. How will this exceed Coastal (CEQA), State, and Federal Air Quality regulations for carbon and ozone emissions? How will this impact residents and visitors alike- especially the very young and old- who are adversely impacted by these gasses? The environmental issues of Greenhouse Gas Emissions, Transportation/Traffic and Noise will also be adversely impacted per this process.

Response to Comment PC330-3

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 of the Draft EIR, 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 was determined to be less than significant under Impact AQ-3. The health effects of criteria pollutants on sensitive receptors (which includes children and the elderly) was discussed in Draft EIR Table 3.2-1.

Impacts with respect to car exhaust are also discussed in detail in Section 3.6, Greenhouse Gases of the Draft EIR. Specifically impacts are addressed in Impact GHG-1, Operational, starting on page 3.6-17. As shown in Table 3.6-3 *Estimated Construction- and Operations-Related GHG Emissions*, mobile source emissions are a contributor to GHG emissions. However, the total annual GHG emissions anticipated from the project would be less than the emissions threshold identified for these types of developments. Furthermore, Vehicle Miles Traveled per capita would be less than the regional average. As discussed in Draft EIR Section 3.6.3.2.2, "the proposed project would be...in close proximity to transit, the California Coastal Trail (a well utilized

pedestrian/bicycle path), and existing residences.” Therefore, from a mobile source standpoint, the proposed project would not result in a significant impact to nearby residents with respect to GHG emissions.

The commenter was not specific as to the environmental issues related to transportation/traffic and noise. 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 of the Draft EIR, addresses potential noise impacts associated with construction and operation of the proposed project.

Comment PC330-4

- 3) Hydrology/Water Quality: What impact would this size development have on local groundwater issues?? What about water usage issues? How much water will be used when California suffers from **severe drought** impacting the residents and South Bay? What about sewer issues of runoff and overflow? How will this impact, residents, wildlife and the environment in general?? What about the **potential for floods** via extreme tides, tsunami or storm?

Response to Comment PC330-4

As discussed in the Initial Study, provided in Appendix A of the Draft EIR, the proposed project would not deplete groundwater or interfere with groundwater recharge; therefore, this was not analyzed further in the Draft EIR and was included as an appendix, consistent with CEQA Guidelines Section 15063(c)(3) and 15128. (See Draft EIR Section 1.5.1 and Appendix A, Section IX(b) for additional details.) Groundwater quality was analyzed in Section 3.8, Hydrology and Water Quality of the Draft EIR. As described in Section 3.8, for groundwater (as well as surface water and harbor water) the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade water quality during construction and operation and impacts are less than significant. As noted in Section 3.8, the proposed project reduces the existing impervious surfaces on the project site, and implements stormwater infiltration facilities to reduce polluted run-off.

Potable water consumption is detailed in Section 3.14, Utilities of the Draft EIR. A project-specific water supply assessment (Appendix M1 of the Draft EIR) was prepared by CalWater (the water purveyor for the project site). As presented in Appendix M1, CalWater, even under severe drought conditions, concluded that for the next 20 years (2015–2035), the Hermosa-Redondo District will have adequate water supplies to meet projected demands associated with the proposed project and those of all existing customers and other anticipated future customers for normal, single dry year and multiple dry year conditions. As such, the proposed project would not exceed existing potable water supplies, entitlements and resources, or require and result in new and expanded entitlements, and cumulative impacts would be less than significant.

Section 3.14 also addresses wastewater. As described in Section 3.14.1.2, the main wastewater conveyance and treatment facilities serving the project site (i.e., Herondo Trunk Sewer and JWPCP) currently operate well below their design capacity (i.e., currently operate at 48 percent and 66 percent, respectively, of design capacity). Wastewater capacity at the treatment plant is sufficient and flows to the treatment plant have even decreased slightly over approximately the last 15 years. On a more local level, there are no deficiencies in the City’s sewer collection system relative to the project site and immediate vicinity. Therefore, no significant project or cumulative impact related to wastewater is anticipated to occur.

Section 3.8 of the Draft EIR addresses flooding and found that although the proposed project would place structures within a 100-year flood hazard as defined by the Federal Emergency Management Agency, these structures would not impede flood flows and the finished floor elevations of new buildings would be well above the 100-year flood hazard level. As for wave conditions, Section 3.8 found that the northern segment of the protective revetment/wall landward of the Horseshoe Pier is vulnerable to wave overtopping under the annually occurring wave condition. This would continue to occur under the proposed project and could result in inundation of the new building located along the proposed boardwalk. With implementation of mitigation measure MM HWQ-2, possible inundation associated with wave uprush would reduce this impact to less than significant. The boardwalk along the perimeter of Seaside Lagoon and Basin 3 are also currently subject to wave overtopping during storm conditions. This would continue under the proposed project; however, as no structures are located within this area and no increase in the number of people are likely to be present at these locations during storm conditions, the impact is less than significant. Sea level rise was also addressed in Section 3.8.

The project site is located within a tsunami-induced inundation zone for a tsunami originating in the coastal waters of California according to the California Governor's Office of Emergency Services. As detailed Section 3.8, implementation of the proposed project would increase the elevation of a portion of the northern portion of the project site, which would reduce, to some degree, the potential for hazards and damage associated with a future tsunami or seiche event compared to existing conditions; however, with revitalization of the project site, including the net increase in building area and the increase in activities at, and patronage of, the project site, there is also the potential of more people being present at the project site, and at risk, should a major tsunami or seiche occur in the future. The City has developed an emergency evacuation route and other emergency procedures for its coastal areas to address potential risks associated with tsunamis. The Draft EIR determined that a significant and unavoidable impacts would occur 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). Please see Response to Comment PC330-5 for discussion of wildlife.

Comment PC330-5

- 4) Biological Resources: How would the existing flora, fauna, fish and wildlife that currently accesses the Harbor and area be directly affected? How would the California Department of Fish and Game standards for wildlife or U.S. Fish and Game standards be impacted? What migratory birds and beasts would be affected?

Response to Comment PC330-5

The commenter has provided general comments that do not introduce new environmental information or directly challenge the information presented in the Draft EIR. Section 3.3, Biological Resources of the Draft EIR details the existing wildlife and vegetation (on land as well as in the water). The Draft EIR 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. Refer to Comment AS004 (the letter from the California Department of Fish and Wildlife) for their input on the project.

Comment PC330-6

- 5) Aesthetics: Views from project would be blocked** from several significant areas: Czelugar Park- from

Catalina Avenue West to the current top floor of the Parking structure (See Figures 1- 3A)#

>Views from the Harbor Drive Parking Lot (See Figures 4 -7)#

Several beautiful vistas will be lost due to the inclusion of 3 story buildings

>Beryl Street View West to North Harbor Drive (See Figures 8 and 9) #

Creating a “concrete canyon” with a three story building on the SW corner of Beryl St and N Harbor Drive

** Per the State Coastal Commission Coastal Act protecting the public’s view of the coast, harbor and ocean.

Pictures supplied with original submission July 21 2014.

[For the photos referenced, see the scoping comment by the commenter in Appendix A, NOP/IS/CEQA Scoping Summary Report, of the Draft EIR (page 592-603 of the electronic PDF file of Appendix A).]

Response to Comment PC330-6

Please see Section 3.1 of the Draft EIR for analysis of aesthetic impacts, which included views from the water (referred to as Key Observation View 7). Please also refer to the Master Response #9: Views and Scale of Development. Please also see Response to Comment PC333-3 for discussion of views from Beryl Street. 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 PC330-7

- 6) Recreation: Will residents and visitors be able to continue to USE the Harbor without impingement of boating activities? According to the plan, the Seaside Lagoon size would be reduced, and then opened to the harbor. How will this be possible? Who will be responsible for the Seaside Lagoon’s upkeep from tidal flow of waters and wildlife (seal and bird intrusion?)

Response to Comment PC330-7

As noted throughout the Draft EIR (particularly Chapter 2, Project Description and Section 3.12, Recreation), the proposed project would 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. With the new small craft boat launch facility, public boating would be enhanced. As for information on the Seaside Lagoon, please refer to Master Response #4: Modifications to the Seaside Lagoon. Please also see Response to Comments PC323-73 and PC323-96 for discussion of the proposed boat slips and bridge.

Comment PC330-8

- 7) The South Bay Parkland Conservancy endorses and refers to Building a Better Redondo Comments to the Waterfront Draft Environmental Impact Report submitted by Jim Light on 1/18/2016

South Bay Parkland Conservancy would like to work alongside a development team that is open to help plan a harbor centric development that will allow for the intersection of harbor life and tourism in a manner that benefits all who would live, work and visit this beautiful area----revitalization----- not overdevelopment.

[For the photos included in this comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC330-8

No methodology was included regarding the commenter's before and after photos. In addition, no precise measurement appears to have been taken regarding the size or shape of the proposed buildings noted in the after photos. As detailed in Section 3.1.4.1 of the Draft EIR, the aesthetics and visual resources analyses considered the effects on the existing visual environment based on proposed building siting, massing, and heights, as well as the conceptual site plan (Figure 2-8 in Chapter 2 Project Description), simulations, and renderings. Also refer to Master Response #9: Views and Size of Development. Please see Response to Comments PC323-1 through PC323-140 for responses to the comment letter submitted by Jim Light on January 18, 2016. 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. PC331

BEN SLOAN

Comment PC331-1

Thanks for taking the time to share this document with the public and opening it up for comments. I realize there is a lot of effort that went into its preparation. I feel there are several areas of concern that were either skipped over or taken too lightly in the Draft. My comments are attached:

1. Aesthetics and Visual Resources: This is one of the most important aspects of this whole project. This is the one thing we all have to live with forever. This EIR simply makes undocumented statements as to how the project will not have "substantial" impact. Based on what? Take for example the theater. Isn't a theater a windowless building and it is being proposed to sit on the top elevation of a site with one of the most outstanding views on the Coast. This won't be an eyesore?

Response to Comment PC331-1

The Draft EIR provides a detailed analysis of public views using existing photos and simulations from a 3D model. See the analysis in Section 3.1, Aesthetics and Visual Resources, under the threshold AES-1 addressing "designated local valued view available to the general public." In addition, please refer to the Master Response #9: Views and Scale of Development. 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. 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 PC331-2

2. Land Use and Planning LUP-1 : Measure G designated the area which is the Seaside Lagoon and the parking area next to it all the way to N. Catalina as “P” (See text and map on Page 2 of the Ballot Text) How is it that this EIR addresses it as “CC” Coastal Commercial and adds it the development?

Response to Comment PC331-2

The commenter is confusing two different land use classifications. The text and map on page 2 of the Measure G ballot is the Coastal Land Use Plan designation (see Figure 3.9-4 in Section 3.9, Land Use and Planning of the Draft EIR); this Figure designates Seaside Lagoon as P-PRO, Parks, Recreation and Open Space, with the surrounding land uses classified as CR, Commercial Recreation. The Coastal Zoning is a more detailed set of regulations to implement the Coastal Land Use Plan, which are contained in the City’s Zoning. The ‘CC’ Coastal Commercial is a Zoning Classification for the uses surrounding the Seaside Lagoon; however, Seaside Lagoon’s zoning is classified as P-PRO (see Figure 3.9-6 of the Draft EIR).

Comment PC331-3

3. Also the EIR seems to be confused on what is supposed to be added to this area. On one drawing it shows Retail shops while on another it shows something entirely different. (See Figure 3.3 of the Executive Summary)

Response to Comment PC331-3

Under the proposed project the Seaside Lagoon would continue to be designated as P-PRO. Please refer to Master Response #4: Modifications to Seaside Lagoon for additional details, including information on accessory uses allowed in the P-PRO zone.

It is unknown as to what confusing information in the EIR the commenter is referring too. In addition, the commenter mentions a figure (Figure 3.3) that is not in the Executive Summary. To the extent the commenter is referencing Figure ES-3, this figure shows refinements to the proposed project “Subsequent to release of the NOP/IS” with the top photo representing the NOP/IS Conceptual Site Plan from April 2014, with the bottom Figure representing the updated site plan released with the Draft EIR in December 2015.

Comment PC331-4

4. The EIR fails to make available larger electronic copies of the maps and drawings. The small ones attached to the files are too small to zoom in and read in detail leaving much confusion.

Response to Comment PC331-4

As noted in the notices and also the Draft EIR (Chapter 1), documents incorporated by reference, as well as hard copies of the document, are available for public inspection at City Hall, Community Development Department, 415 Diamond Street, Door “E,” as well as the Draft EIR and appendices available at the City Clerk, 415 Diamond Street, Door “C,” the Redondo Beach Public Library Main Branch, 303 N. Pacific Coast Highway, the Redondo Beach Public Library North Branch, 2000 Artesia Boulevard, and <http://www.redondo.org> (follow link to Waterfront on Home Page). Additionally, many of the Draft EIR pdfs can be zoomed in without resulting in pixelization of the text or numbers, including Draft EIR Figure ES-3.

Comment PC331-5

5. As an example of the confusion, Pacific street is shown as continuing to Torrance Blvd. On the small drawings available, it appears there is inadequate room for the road. When I walk to that area I see on one side the wall to the Condo complex and the other side the sea wall. There is no room for a road. The EIR does not adequately address this issue.

Response to Comment PC331-5

The Draft EIR correctly shows the Pacific Avenue Reconnection, which would connect Torrance Circle to Harbor Drive/Pacific Drive. As noted on Draft EIR page 2-45, the proposed project includes the removal of the existing International Boardwalk and the facilities associated therewith. Please see the cross sections of the proposed roadway, bicycle path, and pedestrian facilities along the proposed Pacific Avenue Reconnection in Figure 2-18 of the Draft EIR.

Comment PC331-6

6. Traffic: One of the most dangerous and busy intersections of the area was not included in the study?? On one corner is a McDonalds that sees a lot of traffic, on the other is a Starbucks which always backs up traffic and on the other is a High School. There have been numerous accidents at this intersection. (See Figure 3.13-5 of the Traffic Analysis document). Also, there is no comparison between the last traffic analysis dated 2008? and the one taken in 2013-14. How do we know that there already has been a huge increase. The report form around 2005? stated that PCH would have to be widened to three lanes each direction by 2010!

Response to Comment PC331-6

We are not aware of the 2005 traffic report referred to in the comment. Neither the Redondo Beach Circulation Element, nor the Harbor Pier Zoning Amendments study analyzed 2010 conditions and stated that Pacific Coast Highway would have to be widened to three lanes in each direction. Traffic in the study area has not grown substantially along Pacific Coast Highway. For example, based on Caltrans's Traffic Volumes on State Highways reports in 2007, Pacific Coast Highway north of Torrance Boulevard had an average annual daily traffic volume of 41,000 vehicles. In 2014 (most recently available report from Caltrans), the annual daily traffic volume was 39,500, essentially the same volume 7 years later. In 2005, the average annual traffic volume in this location was 43,500, so traffic declined by 9 percent between 2005 and 2014. Please also see Response to Comment PC323-130 for discussion of prior traffic analyses, including the 2007 Circulation Element Analysis. The commenter also asks why the intersection with the McDonalds and the Starbucks was not included in the traffic analysis. The commenter appears to be referencing the Intersection of Diamond Street and Pacific Coast Highway. 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.*" Diamond Street is not expected to carry project related traffic because it would be out of direction travel to access Pacific Coast Highway from the project site, and so was not selected as an analysis location. Vehicles would need to turn northward on Pacific Avenue, then turn southward on Catalina Avenue, before turning northeast on Diamond Street before reaching Pacific Coast Highway. Connections from the project site along Torrance Boulevard and Beryl Avenue would provide far more direct access to Catalina Avenue and Pacific Coast Highway, and therefore project traffic is expected to use those corridors.

Comment PC331-7

7. Greenhouse Gases GHG-1 and GHG-2. Again, a simple “not significant” to the answer of a highly technical question. It seems to me the proposal is to add restaurants, hotels, theaters and shops. Each and every one of these will need to consume natural gas for cooking and heating. There is no accounting for how much additional CO and Co2 will ne admitted. This is highly unprofessional to simply state that its not significant. Maybe they will all be using electricity or renewable recourses. We don’t know because this Draft EIR simply passes it off as not a problem.

Response to Comment PC331-7

Section 3.6, Greenhouse Gases of the Draft EIR, details the existing and proposed project uses that generate greenhouse gas (GHG) emissions. Contrary to the assertions in the comment, these calculations expressly included greenhouse gas emissions associated with natural gas consumption and electricity generation. As noted on Draft EIR page 3.6-16:

The proposed project would generate GHG emissions from a variety of sources. First, GHG emissions would be generated during construction of the proposed project. Once fully operational, the project’s operations would generate GHG emissions from both area sources and mobile sources. Indirect source emissions generated by the proposed project include electrical consumption, water and wastewater (transportation),...combustion of natural gas for heating and cooling, landscaping equipment and consumer product use [including natural gas for cooking].

Detailed calculations associated with GHG emissions are included in Draft EIR Section 3.6 and Appendix G. As noted on Draft EIR page 3.6-13 “the CO2 intensity factors under the proposed project’s 2020 buildout scenario were adjusted to account for the achievement of a 19.9 percent renewable energy generation by SCE in 2014. [FN8-While the proposed project would not be built out until 2019, it is unknown what level of renewable energy generation will be available at that time. Therefore a conservative estimation, the 19.9 percent achieved in 2014 was used to determine the CO2 energy intensity.]” At this juncture these assumptions are considered highly conservative; SCE’s renewable energy procurement for 2014 was updated to 23.5 percent, and SCE is currently under procurement contracts to provide 36.9 percent of their energy from renewable resources by 2020. As noted on Draft EIR page 3.6-14 “with the continued increase in renewable energy generation in SCE’s energy portfolio, the energy intensity of electrical generation will continue to decrease, resulting in less indirect emissions from energy generation.” Please also see Draft EIR page 3.6-6 and Response to Comment PC323-123 for discussion of planning efforts to reduce vehicle miles traveled per capita (and the associated GHG emissions).

In addition, unlike the existing uses at the site, the proposed project would also be consistent with Title 24 for energy and water conservation practices and be designed and constructed in a manner that would meet the City’s overall sustainability goals.

Comment PC331-8

8. There are numerous references to the existing square footage of development from MeasureG and an entire Appedix which shows and list each building and shed. However, there is a proposal to add a large amount of additional square footage but not one list or scaled drawing that shows what building is whereor how tall it will be. How are we supposed to really to evaluate all of this if there are no details?

Response to Comment PC331-8

Figure 2-8 in Chapter 2, Project Description of the Draft EIR discloses the proposed maximum heights of the individual structures (or range of heights for multi-story structures). 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.

COMMENT LETTER NO. PC332

THOMAS A. GRAY

Comment PC332-1

I support the proposed Redondo Waterfront project. Here's my observations as a long-time resident.

1. The entire area is run-down and is a Fixer Upper.
2. Most folks do not even think of going down to the harbor area for entertaining, etc.
3. It is so underutilized.....mostly vacant parking lots right next to the water!
Brilliant Planning!
4. The area needs parking, and substantial investment that we cannot afford if we wanted to.
5. I have seen rendering of the CenterCal plan – beautiful! Can't wait for it!

I would consider the following:

1. Try and keep Pollys pier.....it would certainly be an attractive addition to a lifestyle center!
2. A trolley line or some form of "people mover" would be greatperhaps along the new Pacific Ave.
3. Perhaps connecting the entire project!
4. You might downsize this a bit.....but do not "gut" it and take away the success of the project.
5. We are looking forward to the Movie theater and Public Market, and opening up of the lagoon!

Response to Comment PC332-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. 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.

As for size of the project, the proposed project is consistent with all applicable land use and square footage associated with the project site/area. (See Section 3.9, Land Use and Planning of the Draft EIR.) As also discussed in Draft EIR Section 2.1.1.5.8, the proposed development on the site has already been significantly reduced from its first zoning proposal in 2007 [the original proposal included up to 750,000 additional square feet]. Nevertheless, a reduced project was analyzed in Chapter 4, Analysis of Alternatives (Alternative 7: Reduced Project). 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.” This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles.

COMMENT LETTER NO. PC333**EVA CICORIA AND AL SATTLER –
SIERRA CLUB - PALOS VERDES SOUTH
BAY REGIONAL GROUP**

Comment PC333-1

Please find attached the Sierra Club comments on the DEIR for the proposed CenterCal project to develop the Redondo Beach waterfront. Kindly return a confirmation of receipt. Thank you for the opportunity to comment.

We are commenting on the DEIR for the proposed Center Cal development of the Redondo Beach waterfront (the Proposed Project). In making these comments, we are fully aware of the need for, and benefits of, revitalization of the area. However, in its role as steward of the Redondo Beach coastline, the City should take a very critical look at this DEIR and its inaccurate and misleading representations, as well as the Proposed Project and its very real, adverse impacts. Coastal development projects should be designed with a view to enriching people's lives through opportunities to enjoy the coastline for what it is, rather than with a view to enriching a developer by permitting our scenic and recreational waterfront resources to be used for the opportunistic placement of urban infrastructure such as cinemas and shopping malls, creating walls where views once were enjoyed and further reducing the coastal area available for coastal-related recreational activity, including coastal-related commercial-recreational activity.

Our comments focus on just a few of the most offensive failings of the DEIR.

Response to Comment PC333-1

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. Please see Response to Comments PC333-2 through PC333-26 below addressing specific comments raised.

Comment PC333-2Project Description

While the project description is not required to be excessive, it is required to include all information “needed for evaluation and review of the environmental impact.” California Code of Regulations, Guidelines for Implementation of the California Environmental Quality Act, § 15124 (“CEQA Guidelines”). “An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA Guidelines, § 15151 “An EIR on a construction project will necessarily be more detailed in the specific effects of the project.” CEQA Guidelines, § 15146(a).

The project description does not provide adequate information to thoroughly evaluate certain impacts. For example, the actual heights of the buildings and their elevations must be provided in order to determine the full impact on views, especially views of the water from public places such as Czuleger Park and nearby public

streets.

Response to Comment PC333-2

(1) 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. As also detailed in Response to Comment PC323-29, the Draft EIR provides enough specificity under CEQA to evaluate the potential environmental impacts of the proposed project and alternatives. Please refer to Master Response #9: Views and Scale of Development regarding building elevations. Please also see Draft EIR Figures 3.1-7, 3.1-8, and 3.1-9, which shows the views from Czuleger Park and Harbor Drive under baseline conditions and conditions with the proposed project. (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 commenter's suggestions related to the project description will be forwarded to the decision makers as part of the Final EIR for their consideration.

Comment PC333-3

Aesthetic and Visual Resources

"An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project." CEQA Guidelines, § 15121(a). The purpose of informing public agency decision makers and the public is not served if a DEIR or EIR analysis reflects bias or seeks to put conditions in the most favorable light to the exclusion of other information.

The DEIR analysis of aesthetic and visual resources is patently developer-biased in the choice of views used to analyze potential view impacts and in the apparent preference for buildings over open vistas along the coastline. Views of the water from all public places in Redondo Beach must be evaluated in the DEIR. These include, but are not limited to, views from Diamond, Beryl, Herondo/Anita, and Catalina streets, and Veterans Park, none of which were considered.

Response to Comment PC333-3

The Waterfront Draft EIR was prepared by the City and its consultants consistent with CEQA Guidelines Section 15084(a). The methodology for the selection process for local valued views was discussed in Draft EIR Section 3.1.2.3.4; these viewpoints were determined to be representative of other view locations in their proximity. The purpose of the EIR is to compare the changes proposed by the project to the existing physical conditions. The significance of these impacts is based upon:

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/alterd). (Draft EIR Section 3.1.4.1.1.)

Boardwalk) is immediately west of the condominiums, but at a lower elevation and thus cannot be seen from this location. New development west of the Diamond Street terminus would include the Redondo Beach Marina/Basin 3 reconstruction and the Pacific Avenue Reconnection, which would continue to be at lower elevation than the condominiums and would not be visible from Diamond Street.



Photograph PC333-1 - Diamond Street southwest of Irena Avenue (#1 on the Key Map above)

A glimpse of water is visible at the bottom of Diamond Street at the intersection with Catalina Avenue. Key Observation Views 1, 2, and 3, are located approximately 300 feet northwest from this intersection and were considered representative of other viewpoints in close proximity. In this case, these Key Observation Views would be considered a worst-case analysis of views from Diamond Street, given the limited existing views of the ocean from Diamond Street (see Photograph PC333-2 below).



Photograph PC333-2 –Catalina Avenue at Diamond Street (#2 on the Key Map above)

The commenter also suggests an analysis of views along Beryl Street. The project site would not be visible from most viewpoints along Beryl Street. Similar to Diamond Street described above, views of the ocean are available at Beryl Street near Juanita Avenue. As with Diamond Street, the view includes development at the end of the street (in this case, the Crowne Plaza Hotel) with the water beyond. As shown in Photograph PC333-3, the Crowne Plaza Hotel and development and landscaping along Beryl obscure views of the project site from this location. Near the intersection of Beryl Street and Catalina Avenue, most the site would continue to be obstructed by the Crowne Plaza hotel building and this location does not include an ocean view. Views closer to the intersection of Beryl Street and Harbor Drive, are represented by Key Observation Views 4 and 5.



Photograph PC333-3 – Beryl Street Southwest of Juanita Avenue (#3 on the Key Map above)

The commenter also suggests an analysis of views along Anita Street/Herondo Street. Anita Street/Herondo Street is located at its closest point 0.5 mile north of the project site. Views of the water are available from Anita Street/Herondo Street from approximately Prospect Avenue west (see Photograph PC333-4). From approximately Prospect Avenue, there is view of the harbor area (including but not limited to the project site) and Pacific Ocean. Power lines and the AES Power Plant are also central visual features at this location that reduce the overall quality of the view. The proposed project is at a lower elevation than much of the existing development (i.e., the condominiums located west of Catalina Avenue, Crown Plaza Hotel at Beryl Street and Harbor Drive, and the AES Power Plant on Harbor Drive south of Herondo Street which are visible from some locations along Anita Street) and as such, the development associated with the project would not be visible or distinguishable from other development in the area. From further west on Anita Street/Herondo Street, views of the water area are of the north of the project site, and the project site is not visible. Consequently, the project would not result in a significant view related impact at this location.

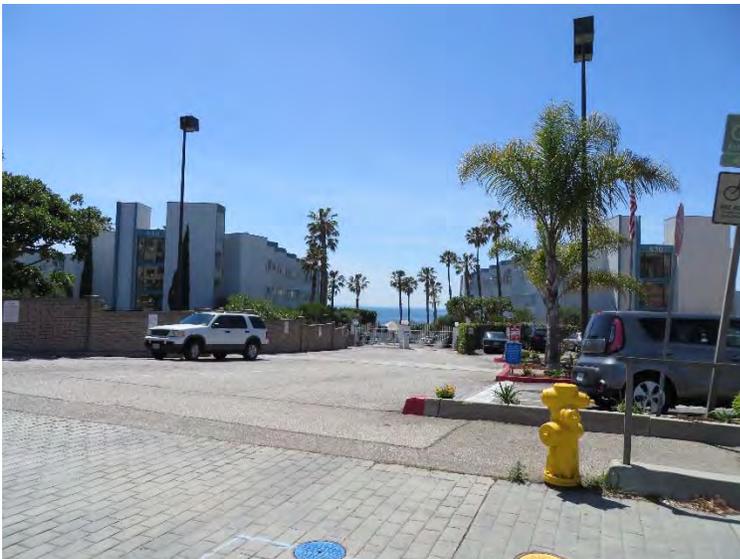


Photograph PC333-4 - View from the sidewalk on Anita Street/Herondo Street west of Prospect (#4 on the Key Map above)

The commenter also suggests an analysis of views along Catalina Avenue. As discussed under the response associated with Diamond Street, the Draft EIR included an analysis of Key Observation Views 1, 2, and 3, which are located approximately 125 feet west of Catalina Avenue and were considered representative of other viewpoints in close proximity. In this case, these Key Observation Views would be considered a worst-case analysis of views from Catalina Avenue. As can be seen in Draft EIR Figure 3.1-5, except for the view through Czuleger Park, views of the project site are extremely limited from other locations along Catalina Avenue, which are largely blocked under existing conditions by a series of approximately 25 condominium structures and associated landscaping (see Photographs PC333-5 and PC333-6 below). As shown in Photograph PC333-6 below, a portion of the top of the existing Pier Plaza roofline is visible between the condominium buildings from this location, with the water and horizon visible beyond. Under the proposed project, the maximum elevation of development at this location would be similar to the height of the existing Pier Plaza development, and therefore, views of the water and horizon above the new roofline would remain. Therefore, the views from this location would not substantially change and no significant impacts would occur. For discussion of views south of Torrance Boulevard on Catalina Avenue, see the subsequent discussion of Veterans Park.



Photograph PC333-5 - View from the sidewalk on Carnelian Street east of Catalina Avenue (#5 on the Key Map above)



Photograph PC333-6 – View from the sidewalk on Catalina Avenue at Garnet Street (#6 on the Key Map above)

The commenter also suggests an analysis of views from Veterans 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 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.



Photograph PC333-7 - View from sidewalk on Torrance Circle at the northeast edge of Veterans Park (#7 on the Key Map above)

Comment PC333-4

The Proposed Project involves putting up buildings across virtually the entire project site. To say that this will not have a significant negative impact on the *coastal* experience and coastal views as people drive, ride their bikes, skate, or walk along Harbor Drive defies credibility.

AES1 and AES2: The Proposed Project would have a significant adverse impact on a designated local valued view available to the general public and would have a significant adverse impact on the visual character of the site and its surroundings.

The existing view all along Harbor Drive from the southern point of Harbor Drive to Portofino Way includes views of the harbor, the ocean, and a significant local coastal land form, the Palos Verdes Peninsula. The three observation points from the northern portion of the project site that were selected for the DEIR, views 4, 5 and 6, appear to be points from which the only three glimpses of the waterfront and horizon will be available at all along Harbor Drive upon project completion--views through the three narrow corridors between buildings. Their choice by the DEIR preparer as the "designated views" is a gross distortion of the available view and appears to be an intentional attempt to conceal, rather than reveal, the project's true impacts.

Response to Comment PC333-4

As clarification, the threshold relative to views analyzed in the Draft EIR is whether the proposed project would have a substantial adverse effect on a designated local value view available to the general public. (See threshold AES-1 in Section 3.1.4.2 in Section 3.1, Aesthetics and Visual Resources of the Draft EIR.) As further clarification, the Draft EIR determined that the proposed project would have an impact on views; however, that impact was determined to be less than significant.

As described in Section 3.1, the views along Harbor Drive are of limited quality. 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.

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.” There would be an enhanced boardwalk along the water’s edge, including the pedestrian/bicycle bridge across Basin 3 that would provide open views of the ocean. Page 3.1-44 also acknowledges that “views of the Palos Verdes Peninsula would no longer be available from this location (*Key Observation View 4*); however, views of the Palos Verdes Peninsula are not the focus of public views from Harbor Drive. The commenter provides no scientific basis for assertions that impacts to views would be greater than those evaluated in the Draft EIR.

Please refer to Master Response #9: Views and Scale of Development regarding the views analyzed in the Draft EIR, which were selected by the lead agency (City of Redondo Beach) because they are designated views and/or will become key views under the proposed project.

Comment PC333-5

Similarly, the view of King Harbor from the water will be largely a wall of buildings, which is not discussed in the DEIR, notwithstanding that the view from the water is an important consideration under the Coastal Act.

Response to Comment PC333-5

Views of the project site from the water are addressed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, under Key Observation View 7, beginning on page 3.1-46. As described therein, impacts were determined to be less than significant. Figure 3.1-11 provides a rendering of a representative view from the water. Figure 3.1-12 also provides a rendering of the overall project site as viewed from the west, over the ocean, albeit from an aerial perspective.

It should be noted, the California Coastal Commission’s primary focus of view protection is on land-based scenic views from public parks, trails, roads, and vista points, although views from state ocean waters (up to three-miles from shore) are also considered. Views from the ocean considered for protection generally include rural portions of the coast; however, in some cases scenic values of urban areas as seen from coastal waters

have been protected, such as Marina Del Rey and Point Loma.⁶⁹ The Coastal Commission does not identify Redondo Beach as having protected views.

Comment PC333-6

“The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Such regional plans include, but are not limited to . . . regional land use plans for the protection of the Coastal Zone.” CEQA Guidelines, § 15125. The DEIR does not properly or in sufficient detail analyze these inconsistencies.

The Coastal Act and the City's Local Coastal Program/Plan require that public views along the coastline, including from publicly accessible open space and Harbor Drive, be *preserved and enhanced*. The Harbor/Civic Center Specific Plan requires that building massing be broken up and minimize obstruction of ocean views. The DEIR states that "the addition of new design elements and improved public spaces will enhance the visual quality of the site" as if somehow the construction of nicer (and bigger) buildings makes up for the loss of views. Californians have made tremendous strides through implementation of the Coastal Act toward protecting their right to coastal resources. Redondo ought not reverse that progress by substituting buildings and landscaping, however nice looking particular participants in the process may feel they are, for views and an open horizon across the project site.

Response to Comment PC333-6

Consistency with applicable land use plans, including the City's Local Coastal Plan is addressed in Section 3.9, Land Use and Planning of the Draft EIR, under Impact LUP-1, beginning on page 3.9-26. Contrary to the implications in the comment, the standard for consistency is not as stringent as suggested in the commenter (i.e., a policy by policy consistency conclusion). As discussed in Draft EIR Section 3.9.4.1 and *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490 “A project is consistent with a county's general plan (and any specific plan adopted to further the objectives of the general plan), if considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment...A given project need not be in perfect conformity with each and every general plan policy.” (Internal formatting omitted.)

Also, please see Response to Comment PC323-71 that addresses consistency with Land Use Policy 2, which addresses the preservation and enhancement of public views of the water from the moles, pier decks, publicly accessible open space and Harbor Drive.

As clarification, the Specific Plan does not require that building massing be broken up, but presents this as recommended policy. Massing is broken up through the provision of building of vary sizes, including some buildings and portions of buildings that are set back from Harbor Drive, as well as interspersed with the view corridors and the Redondo Beach Marina/Basin 3. In addition, please refer to Master Response #9: Views and Scale of Development regarding views and massing. Further, 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

⁶⁹ California Coastal Commission. 2004. Memo: Protecting Views from the Ocean Under the Coastal Act, From Peter Douglas, Executive Director to Commissioners and Interested Persons. May 4. Available at: <http://www.coastal.ca.gov/lu/views.pdf>.

through parking lots, and enhance the character of the Harbor area as a pedestrian-active area.” (April 8, 2008 Administrative Report, page 26.) Coastal Commission staff also previously responded to allegations that buildout of the 400,000 square cumulative development cap 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.)

Please see Response to Comment PC323-62 regarding consistency with the California Coastal Act and Response to Comment PC333-2 through 5 above regarding the California Coastal Commission’s focus for view protection and the addition of new and improved public views along the Pacific Avenue Reconnection and other locations on the project site. 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.

Comment PC333-7

The DEIR goes to great lengths to describe viewer groups and viewer sensitivity, concluding that "recreational viewers . . . tend to experience the natural and built surroundings as a secondary feature of other nearby activities". (3.1-6) Nothing in CEQA permits the government decision maker to determine that some or all of the public does or does not value environmental qualities. The very essence of CEQA is the legislative mandate that “[i]t is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.” California Public Resources Code § 21000. The government decision maker must assume that the public values environmental resources; to do otherwise overrides legislative intent and violates CEQA.

To declare the natural environment to be a secondary feature undermines the purpose of the CEQA, to prevent development from overwhelming the natural environment, to prevent development from treating the environment as second fiddle. On the California coast, as in many other areas, the environment is the primary attractant, it is what brings people to the coast. Consider that very large group of "viewers" made up of cyclists riding along the Redondo coastline. (Based on data provided in the DEIR that group is thousands *each day*.) The built environment is not what draws them to the coast. And the project as designed will have a significant adverse impact on the aesthetic and visual resources along Harbor Drive. The built environment is and must remain secondary.

Response to Comment PC333-7

The commenter’s 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. Regarding the importance of views to recreational users, the comment provides a partial description of the information presented in the Draft EIR and omits what follows. As stated on page 3.1-6 in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, views are a primarily attractant to some recreational users (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.

Regardless of the mischaracterization the commenter makes of viewer sensitivity presented in the Draft EIR, the categorization of viewer sensitivity for various types of viewer groups does not constitute the Draft EIR

making a determination that some members of the public do not value environmental qualities. See Section 3.1.4.1, which describes the methodology under which the views impacts were determined. It should also be noted that “environmental quality” includes a wide array of environmental topics - not only views. As required by CEQA, these environmental topics are addressed throughout the Draft EIR in Sections 3.1 through 3.14.

Further, one singled-out sentence relative to viewer sensitivity does not provide a scientific basis that shows that the Draft EIR considers the natural environment to be a “secondary feature.” The commenter does not show that there would be greater environmental impacts than the proposed project than those evaluated in the Draft EIR.

Comment PC333-8

Referring to existing conditions, the DEIR states that "the harbor, ocean, and Palos Verdes Hills provide the predominant visual features in the area" (3.1.2.2) and "the coastal location defines the visual character of the harbor". The DEIR states that existing "views of the harbor are generally available throughout the site", acknowledging that this is in large part because of the "dispersal of structures". (3.1-15) The DEIR further accurately reports that, while "the presence of large areas of surface parking lots lowers the visual quality of the site" it allows for views of the harbor, moored vessels (which "provide a high degree of visual interest" and "contribute to the waterfront ambiance" (3.1-19)), the ocean, the Palos Verdes Peninsula, and the horizon, including sunsets--in essence, the coastline.

The Coastal Act is intended to protect the scenic beauty of the coastal landscape as a resource of high public value--high in part because it *is* limited. As the DEIR notes, under existing conditions views are "partially obscured by intermittent structures, the splash wall, and landscaping" (3.1-23). That is all the more reason to protect the view that is available, or enhance it, rather than eliminate it. The wall of buildings proposed for this stretch of coastline would obliterate the view. Not everyone will be able to afford to stay at the proposed boutique hotel or dine at Kincaid's or other proposed restaurants, to enjoy the coastline. Cycling along here and taking in the coastal environment, including views, provides an enjoyable, healthy, recreational activity currently available to a broad, diverse, very large segment of the general public, and is precisely what CEQA is designed to protect.

Response to Comment PC333-8

The commenter references as number of statements from the Draft EIR that have been taken out of context. The first reference is to Section 3.1.2.2, which is discussing the “Regional Setting” and is providing an overview of the general area; however, that does not mean that all of these features are visible from every location. The commenter next selectively quotes language from page 3.1-7, which was intended to provide an overview of the types of land uses in proximity to the project site:

The coastal location defines the visual character of the harbor, *through both the proximity of the harbor and ocean and predominance of uses and activities directly associated with water-oriented recreation and tourism.*

The commenter then selectively quotes language from Draft EIR page 3.1-15 which notes:

Given the dispersal of structures, views of the harbor are generally available from throughout the site; *however, they are limited by landscaping, intervening structures, and cars in the surface parking lots.* The presence of large areas of surface parking lots lowers the visual quality of the site.

Many of the partially referenced phrases above discuss conditions from within the project site. 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.4th 369, 392.) Furthermore, as described in Section 3.1, Aesthetics and Visual Resources of the Draft EIR, and noted in Response to Comment PC333-4 above, there would be an enhanced boardwalk along the water's edge, including the pedestrian/bicycle bridge across Basin 3 that would provide open views of the ocean. Page 3.1-44 also acknowledges that "views of the Palos Verdes Peninsula would no longer be available from this location (*Key Observation View 4*); however, views of the Palos Verdes Peninsula are not the focus of public views from Harbor Drive. (See also the *Key Observation View 6* analysis from within the project site on Draft EIR page 3.1-46.) Outdoor seating area would also be provided throughout the site, allowing visitors to experience the view. New views would be provided to motorists along the Pacific Avenue Reconnection, and to pedestrians and bicyclists from the pedestrian/bicycle bridge.

The commenter's reference to the "wall of buildings" is assumed to reference views from Harbor Drive. Please see Response to Comment PC333-4 above and Master Response #9: Views and Scale of Development regarding Harbor Drive. As noted, the phases from the Draft EIR cited in the comment, largely refer to views from within the project site, which provide much higher quality views of the water and Palos Verdes Peninsula as compared to views along Harbor Drive. Draft EIR Section 3.1, page 3.1-27, describes views from Harbor Drive as follows:

...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 with today, enjoyment of the coastline would not only be available to patrons of the hotel and restaurants as implied by the commenter, but would be remain accessible and available to any members of the public for passive and active recreational uses, including strolling, bicycling, exercising, photography, fishing, picnicking, water sports, visits to Seaside Lagoon, etc., and public events being held at the site.

Comment PC333-9

Referring to existing conditions, the DEIR states that "the harbor, ocean, and Palos Verdes Hills provide the predominant visual features in the area" (3.1-6) and "[t]he visual character of the proposed project vicinity is defined by its coastal location." (3.1-73). When you look at the Proposed Project, ignoring the fact that it is positioned along the waterfront, you see a development that could be plopped down in Anytown USA. While as a mall it may be attractive, it bears no relationship to the coastal location.

Response to Comment PC333-9

Please see Response to Comment PC333-8. 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. It should be noted that the proposed project includes water-oriented features such as modifications of Seaside Lagoon,

pedestrian/bicycle bridge, reconstruction of the Redondo Beach Marina/Basin 3, enhancement of the waterfront promenade, and small craft boat launch ramp facility.

Comment PC333-10

Admittedly, Measure G approved a 400,000 square foot increase in building along the Coastline. Yet the LCP requires that development be consistent and harmonious with the scale of existing development. The Harbor/Civic Center Specific Plan requires that building massing be broken up. If the increase in square footage were built up intermittently along the Harbor Drive stretch and an effort made to maximize views and minimize the mall effect, the adverse impacts would be considerably less significant. Moreover, the increase in square footage of parking structures was not considered in the LCP and the parking structure impacts for the project exacerbate the adverse impacts to the coastline.

Response to Comment PC333-10

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. Walkways, landscaping, and public gathering spaces would be provided throughout the site to break of the building massing. As described in Section 3.9, Land Use and Planning of the Draft EIR, the proposed development is consistent with the density and building height requirements allowed by the Coastal Zoning. Furthermore, the proposed project does not utilize all 400,000 square feet, and when drafting those provisions, the City provided a cumulative development cap for zones CC-1 through CC-5 because it was anticipated that not all development would be evenly distributed through all of the zones. As discussed in the City Council's April 8, 2008 Administrative Report:

FAR limits are established recognizing that opportunities for development will occur on some properties while other properties will remain unchanged for very long periods. If the maximum FAR is set to accommodate only the average level of development anticipated to occur in a 20 year planning period, development of individual properties would lose their viability...It is not uncommon for sites within large development areas to have great variations in development intensities and for codes to establish a maximum as well as a cumulative FAR limit.

Pedestrian-active commercial areas generally required higher FARs than auto-oriented centers...Although the Harbor area will not be a "downtown", it is intended under the General Plan for development to be reconfigured to "create a unified seaside "village", siting buildings adjacent to one another and orienting them along common pedestrian promenades and public plazas In other words, 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.

The commenter also asserts that square footage of parking structures was not considered in the LCP and parking structure impacts for the project exacerbate the adverse impacts on the coastline. The Draft EIR considered all project components in the impact analysis, including the proposed parking structures. Furthermore, as also discussed in the April 8, 2008 Administrative Report for the project site zoning:

"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, please refer to Master Response #9: Views and Scale of Development regarding massing and the assumptions for clustering of buildings and replacement of surface parking with structured parking that were made during the LCP amendment approval process in 2008.

Comment PC333-11

Czuleger Park

The proposed two story market hall would impact water views from Czuleger Park. Contrary to the fair information requirements of CEQA, the DEIR view observation points from the park appear to have been selected to mask the Proposed Project's view impacts. Other view points from within the park and nearby public streets would reveal significantly greater view impacts.

In sum, the final product of the Proposed Project would be misplaced on the Redondo waterfront. It could be a mall in any urban core. It does not do justice to the coastal zone and the DEIR fails to alert the public to this.

Response to Comment PC333-11

Please refer to Master Response #9: Views and Scale of Development regarding the selection of views analyzed from Czuleger Park. Please see Response to Comment PC323-47 regarding views of the market hall from Czuleger Park.

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 PC333-12

Recreation Resources

Misuse or reduction of coastal resources in Redondo Beach will put pressure on other coastal areas to be developed for truly coastal-related recreational purposes. “Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services.” CEQA Guidelines, § 15126.2(a). The DEIR fails to analyze the impacts on neighboring coastal areas. In addition, the Proposed Project provides a model for other inappropriate development along the coastline in other communities. Most of the improvements seem to focus on eating, shopping, and going indoors to watch movies, rather than on enhancing active recreational use of the harbor and coastline. Even the passive recreational experience of simply observing the coastal environment promises to be degraded by the heavy emphasis of the Proposed Project on urban development.

Response to Comment PC333-12

The commenter cites CEQA Guidelines Section 15126.2(a) and asserts that the “The DEIR fails to analyze the

impacts on neighboring coastal areas.” This Draft EIR was prepared in compliance with the CEQA Guidelines, including Section 15126.2(a). The potential for the proposed project to result in increased use of other recreational facilities during construction and operation such that substantial physical deterioration would occur or be accelerated is addressed under Impact REC-1 in Section 3.12, Recreation of the Draft EIR. As described therein, the proposed project would enhance recreation at the project site and would have less than significant impacts on surrounding recreational facilities, including public beaches within Redondo Beach and neighboring cities. Furthermore, the geographic scope of many resources areas included locations in neighboring jurisdictions. The Draft EIR addresses potential impacts on neighboring areas outside the City’s borders in the cumulative impacts analysis for individual environmental issue areas (Sections 3.1 through 3.14 of the Draft EIR). Growth inducing impacts and urban decay impacts are addressed in Chapter 5, Other CEQA Considerations of the Draft EIR.

Regarding the project providing a model for other coastline development, this comment does not address an environmental issue. However, please note that Coastal Commission staff also previously responded to allegations that buildout of the 400,000 square cumulative development cap 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.)

The comment also incorrectly asserts that most of the improvements seem to focus on eating, shopping, and going indoors to watch movies. The comment ignores numerous recreational components of the project, including but not limited to a new small boat launch ramp, improvements to Seaside Lagoon (allowing for kayaking, paddle boarding, and other ocean related activities), enhanced public open spaces, boardwalks, and new and enhanced pedestrian and bicycle facilities. Land uses associated with food/concession sales, commercial uses, and movies are all permissible uses under the City’s zoning, which was certified by the Coastal Commission. (See Draft EIR, Chapter 3.9 for additional details). However, your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC333-13

To put into perspective the scale of the Proposed Project's impact, note that the DEIR indicates that the area of LA County Beach along the City of Redondo Beach coastline is approximately 36.2 acres. This is roughly the same size as the Proposed Project area. In other words, the Proposed Project proposes substantial urban development for much of the Redondo Beach coastal area. This underscores the tremendous impact the Proposed Project will have on the potential for truly coastal-related recreational activity and the sacrifices being made for the benefit of commercial development along the California coastline that falls within the City of Redondo Beach.

While the Proposed Project does not involve residential development and, therefore, an associated population increase that will strain existing recreational facilities, the development promises to bring in tourists that will put increased demands on existing resources and facilities. “The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected.” CEQA Guidelines, § 15126.2(a). When bringing people into the area, focus should be on developing facilities and resources that are coastal in nature or coastal dependent so as not to attract to the area increased tourism that is merely looking for an urban experience of shopping, cinema, etc., competing with the limited coastal space available for coastal-dependent and coastal-related activities.

Response to Comment PC333-13

The commenter identifies that the acreage of the project site and the amount of beach area in Redondo Beach are both approximately 36 acres and suggests that this shows that the project encompasses much of the City's coast. However, this is an inaccurate comparison, as the project site encompasses just over 0.5 mile of coastline and includes water area and uplands, while the beaches consists of approximately 1.7 miles of coastline that extends from approximately 100 to 300 feet in width. As described on page 2-5 of Chapter 2, Project Description of the Draft EIR, the project site is comprised of approximately 36 acres of the 150 acre of harbor area (the harbor has approximately 62 acres of land and 88 acres of water) owned or managed by the City. The boundary of the harbor area is shown on Figure 2-1 in Chapter 2. Additionally, the project site is approximately 31.2 acres of the approximately 133 acres of land that comprise the City's coastal zone. Furthermore, the majority of the project site is already developed with approximately 219,881 square feet of existing buildings (not including parking structures), consisting primarily of restaurants, retail, and office uses. (See Draft EIR Section 2.3.2.1.) As can also be seen in Figure 2-7 of the Draft EIR, many of the other areas within the project site are comprised of surface parking lots.

Consistent with CEQA Guidelines Section 15126.2(a), an increase in potential visitors to the project site is assumed in the operation analysis of the proposed project throughout the Draft EIR. Specifically, regarding increases in vehicle trips associated with the proposed project, see Sections 3.13, Traffic and Transportation; 3.2, Air Quality; 3.6 Greenhouse Gas Emissions; and 3.10, Noise of the Draft EIR, regarding increases in the need for services at the site, see Sections 3.11, Public Services; 3.12, Recreation; and 3.14, Utilities of the Draft EIR, and regarding possible exposure to hazards, see Sections 3.5, Geology and Soils; 3.7, Hazards and Hazardous Materials; 3.8, Hydrology and Water Quality; and 3.13, Traffic and Transportation of the Draft EIR. Please also see Draft EIR, Appendix A, Notice of Preparation/Initial Study/CEQA Scoping Summary Report. As described in Section XIII of the Initial Study, the proposed project would not establish new residential uses, require extension of roads or other infrastructure sufficient to induce substantial population growth (i.e. the project would not introduce new roads or infrastructure into previously uninhabited areas), or result in the relocation of substantial numbers of people from outside of the region. Therefore, the impact was determined to be less than significant and this issue was not addressed further in the EIR, consistent with CEQA Guidelines Section 15063(c)(3).

Your opinion on the focus of the proposed project will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC333-14

As proposed, the project will have a significant adverse impact on recreational resources. Moreover, the Proposed Project closes the door on possibilities for increased coastal-related recreational opportunities in the future. The DEIR does not support the need for the Proposed Project over other alternatives justifying these significant impacts. "Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described." CEQA Guidelines, § 15126.2(b).

Response to Comment PC333-14

CEQA Guidelines Section 15125.2(b) referenced by the commenter applies to significant unavoidable impacts. As described in Section 3.12, Recreation, impacts on recreation were determined to be less than significant and the commenter does not provide scientific basis for assertions that impacts associated with recreation would be

greater than those evaluated in the Draft EIR. As described in greater detail in Master Response #4: Modifications to the Seaside Lagoon, the project involves a number of recreational improvements in comparison to existing conditions. For example, the proposed project provides a number of benefits to Seaside Lagoon 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). Regardless, the purpose of the proposed project is presented in Section 2.2 of the Chapter 2, Project Description of the Draft EIR. More specifically, the Draft EIR discusses an objective of “reducing seasonality” (Draft EIR Section 2.2 bullet point 1). As discussed on Draft EIR page 2-23, the City has had difficulties associated with “deteriorating physical condition and seasonality of patronage, and lack of distinct destination attractions” under the current Harbor area development. As also discussed in the City Council’s April 8, 2008 Administrative Report for the zoning amendments for the project site, 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 PC333-15

Seaside Lagoon

Seaside Lagoon is a cherished facility, heavily used by young children and families for decades. It includes associated recreational amenities, such as children’s play equipment and volleyball courts. The latter will be removed under the Proposed Project to make room for buildings, only some of which appear to be waterfront related, but information on that is limited in the DEIR and needs to be included to fully understand the impacts. Clearly, the sand and water area of Seaside Lagoon will be reduced. As evident in Figure 3.12-5, the reduction in water entry area will be significant. The DEIR fails to adequately describe and compare the beach and water area and water entry area before and after the Proposed Project. The DEIR mentions a beach club in this area, but there is no explanation as to exclusivity, priority rights to recreational resources, etc. The DEIR also mentions that the smaller Seaside Lagoon area will be required to absorb other recreational activities, such as kayak and paddleboard rentals, that are currently provided elsewhere within the Project area.

Retaining Seaside Lagoon was an important component of Measure G. Reducing its size, eliminating valued features, and adding uses that will detract from children’s access represents not only a significant adverse impact, it is a breach of the commitment made under Measure G. With the Proposed Project anticipated to draw tourists to the hotel, enhancement of this treasured coastal- specific recreational facility should include increasing, rather than reducing, its size. It will no doubt be popular with tourists staying at the hotel. Will there be limits on entry? Will hotel occupants get priority? We’ve seen this sort of thing happen before, after projects are approved. The DEIR fails to evaluate projected changes in attendance and what the smaller lagoon would be able to support.

Response to Comment PC333-15

The replacement of play equipment and volleyball courts is part of the overall redesign of the park, which includes providing a different mix of amenities and converting the enclosed swimming area to a more natural

setting with a direct connection to the harbor. Varying opinions on the desirability of the modified features and amenities is to be expected, and does not address an environmental issue or result in an environmental impact. As described in Section 3.12, Recreation of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon, while features would change, the recreational use of the site would remain. Further, the increased seasonality of the modified park would be a recreational benefit.

The commenter states that “The DEIR fails to adequately described and compare the beach and water area and water entry area” and implies that these are the only facilities which provide recreational value. Draft EIR Figures 2-11 and 3.12-5 provide an overview of the physical modifications to Seaside Lagoon in comparison to existing conditions. To the extent the commenter is challenging the methodology utilized in Section 3.12, please see Response to Comment PC081-7. Furthermore, the recreational value of a site is not defined exclusively by the beach and water area, as implied in the comment. As discussed in Response to Comment PC333-14 above, the Seaside Lagoon would be subject to a number of improvements in comparison to existing conditions. Furthermore, the existing zoning expressly contemplates the development of new concessions and accessory structures/uses within the Seaside Lagoon. Redondo Beach Municipal Code (RBMC) 10-5.1117 also allows for the development of buildings in the Lagoon, not to exceed a Floor Area Ratio (FAR) of 0.25. As discussed in Draft EIR page 3.9-63, the project would comply with this requirement (the proposed project FAR for Seaside Lagoon is 0.094). Draft EIR page 2-56 provides an overview of the proposed uses for Seaside Lagoon, which states:

Buildings located within Seaside Lagoon would include recreation accessory uses, such as marine recreation products and rentals (e.g., kayaks, paddle boards, wetsuits), beach club maintenance, public safety, snack shops, and concessions designed to serve and cater to the recreational uses. [See also Draft EIR page 3.9-63.]

This description provides adequate information to assess potential impacts, consistent with CEQA Guidelines Section 15124, which state 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.” (See *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final project design does not need to be completed at the time of project approval/EIR certification].) Regarding the “beach club,” this would be in a building available for public use, likely the existing pavilion remodeled and enclosed. Amenities that may be provided at the building have not yet been determined but all uses would be consistent with the P-PRO zoning requirements, including allowable accessory uses.

The commenter next asserts that the DEIR mentions a beach club...but there is no explanation as to exclusivity, priority rights to recreational resources.” The proposed project includes the addition of new accessory/recreational uses, such as marine recreational products and sales/rentals (e.g., such as rental of kayaks, paddle boards, wetsuits), public beach club, and concession designed to serve and cater to the recreational uses associated with Seaside Lagoon. In addition, the proposed project will include SUP storage near the lagoon. Other proposed modifications include minor utility work, the enclosure of the existing open-air pavilion, outdoor seating/tables, lawn area, landscaping and hardscaping. Seaside Lagoon would be open to the public with no restrictions and no priority for hotel occupants. As detailed in Section 3.12, Recreation of the Draft EIR, the opening of Seaside Lagoon to tidal influence would allow the public park to be open year-round. With the exception of the occasional special event, the lagoon would be open at no fee to the public. This would increase the site’s availability and accessibility to the public. The modifications would be designed to balance the recreational beach area with swim area. As addressed in impacts analysis in Section 3.12, it is anticipated that the proposed project as a whole could increase the number of local and regional visitors to

project site, and therefore, the use of recreational facilities within and near the project site could increase. However, the enhanced and expanded recreational features, including pedestrian and bicycle pathways, would provide a variety of enhanced recreational opportunities, with newly constructed or renovated facilities throughout the project site and have been designed to handle the proposed uses. (See also *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.A4th 369, 392 [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.])

Comment PC333-16

Bicycle Paths and Bikeways

The analysis of recreation fails to adequately address bicycling as a recreational activity along Harbor Drive and the Proposed Project's impacts on the large segment of the population that participates in that activity. We would expect that, given the data on the number of cyclists using the Harbor Drive bike path and along the waterfront, there would be a section thoroughly addressing this, because the impacts are so great--we believe significant--to this group.

The Proposed Project reroutes the South Bay Bikeway from the edge of the Pier Parking Structure, from which cyclists have a nice view of the waterfront and beyond, to a strip east of the project site and east of the new road connecting Harbor Drive to Pacific Ave., eliminating the existing coastal view. Moreover, this new route creates safety concerns. As bicyclists' exit the hotel area at each end of this stretch, they must look across two lanes of car traffic. None of this was evaluated in the DEIR.

The DEIR states that "under existing conditions, bicycles must be dismounted and walked through portions of the project site." In fact, under existing conditions, bicycles must be dismounted and walked through just one very short stretch (less than 50 yards) of the project site, at the entrance to the Pier Parking Structure. We anticipate that bicyclists will be required to walk their bikes along much, if not all, of the proposed boardwalk, which significantly interferes with the coastal experience and with the vision of Los Angeles County to create a continuous coast bike route. The Proposed Project's priorities are evident in that it makes room for a road for cars through two rows of commercial buildings along the waterfront, on the northern stretch of the Proposed Project, but finds no space for a bikeway along the waterfront—clearly prioritizing commercial over recreational.

Response to Comment PC333-16

As described on page 2-71 of the Draft EIR, the project includes several new bike paths, one which 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. The use of the project site by bicyclists is assumed throughout the operational analysis presented in the Draft EIR, including Section 3.12, Recreation and 3.13, Traffic and Transportation. Specifically, 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. 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 also improve bicycle connections throughout the project site, but 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.

Regarding views from the bicycle path, the commenter states that bicyclists currently have a nice view from the edge of the parking structure. Photographs PC333-8 and PC333-9 show example conditions from the bicycle path. While there is some view of the ocean, traveling through parking structures requires a bicyclist to focus on safety considerations, including navigating a narrow area with columns and posts, while also keeping an eye out for cars and pedestrians, as opposed to enjoying the view of the Harbor (which is obscured in areas from the posts and walls). Further, the change in lighting from low lighting in the parking structure to the natural lighting of outside reduces the visual clarity of the scenery outside the parking structure, as a cyclist's eyes must adjust to the changing light conditions within the parking structure.



Photograph PC333-8 – View of Bicycle Path with Pier Parking Structure



Photograph PC333-9 View towards Horseshoe Pier along the bicycle path in the Pier Parking Structure

Under the proposed project, there would be an enhanced boardwalk along the water's edge, including the pedestrian/bicycle bridge across Basin 3, designed to accommodate bicyclists and pedestrians and would provide open views of the ocean. Regarding the bicycle path east of the Pacific Avenue Reconnection, much of the proposed bicycle path is at a higher elevation than the roadway, providing an improvement in comparison to existing conditions. Due to site constraints, including width limitations and stability issues associated with the bluff and structures to the east, it is not feasible to engineer the roadway east of the bicycle path.

The boardwalk along the water's edge is being designed to accommodate a mixed flow of both bicyclists and pedestrians. While 12-feet in width is the minimum width allowed under the code, the boardwalk 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 RBMC Section 12-2-07. Thus, while it is possible some limitations on bicycle use would be implemented as needed along the promenade, the bicycle path along the eastern edge of the project site would remain available, providing a continuous route across the project site.

Comment PC333-17

The DEIR indicates that the entire project area will be closed during the anticipated 2.5 years of construction. (3.12-32) Walkers and bicycle path users would be rerouted to Pacific Ave., Catalina, and Torrance Blvd. Circle, a route that diverges from the flat South Bay Bikeway to climb well up off the beach. No mention is made in the DEIR of the elevation change and how the thousands of cyclists travelling this route will then safely connect back onto the Bikeway. Nor is there discussion of any impacts to the thousands of walkers over this long period of time, particularly those who choose this route because it is flat. This is a significant adverse impact and should be discussed fully and mitigated by providing an alternative, temporary, level pathway wide enough to accommodate cyclists and pedestrians.

Response to Comment PC333-17

Construction impacts to bicyclists and pedestrians were addressed in Draft EIR, Section 3.13, under Impact TRA-3 and were determined to be less than significant. As discussed therein, the project would comply with the Uniform Traffic Control Devices (MUTCD) [Traffic Control Plan Part 6] encroachment permit requirements and with the City's standard conditions of approval. As part of these requirements, Caltrans requires utilization of the MUTCD [Traffic Control Plan Part 6.]. Among these requirements, are provisions for "Detour for Bike Lane on Roads with Closure of One Travel Direction." (Traffic Control Plan, page 1244.) Similarly, as a standard condition of approval, the City has included a Condition of Approval (COA) COA TRA-1, which includes the requirement to "Minimize land and sidewalk closures to the extent feasible. In the event of a temporary lane or sidewalk closure, a worksite traffic control plan, approved by the City of Redondo Beach, shall be implemented to route traffic, pedestrians, or bicyclists around any such land or sidewalk closures." The commenter implies that the EIR should disclose a significant impact because of a change in elevation. The route along Pacific Avenue represents a change in elevation of approximately 7 feet over 0.14 mile from the intersection with Harbor Drive to the intersection of Catalina Avenue; the route along Catalina Avenue has an approximately 50 foot elevation change over 0.56 mile from Pacific Avenue to Torrance Circle; and the route along Torrance Circle from Catalina Avenue to the connection with the strand (0.15 mile) has an elevation change of approximately 44 feet. These changes in elevation are typical of bicycle routes located in areas with varied topography (including area with coastal flatland and bluffs). It should also be noted that Catalina Avenue is designated as a Class II bicycle lane and Torrance Boulevard (including the portion of Torrance Circle within the project site) is proposed as a Class III bicycle route on the City's bicycle master plan. Further, the elevation change throughout the temporary route would be less than the elevation change on the City's Class II route on Diamond Street. The potential inconvenience of individual bicyclists or pedestrians utilizing an elevated sidewalk/street around the construction site does not rise to the level of a significant environmental impact. (See also *San Franciscans Uphold the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656 ["the social inconvenience of having to hunt for scarce parking spaces is not an environmental impact.])

Comment PC333-18

Open Space

Throughout the DEIR the phrase "high quality open space" is used to refer to the Proposed Project. There appears to be no attempt to define this or support it with a description. Does it mean natural open space, highly altered open space, heavily manicured open space, or perhaps open space characterized by expensive hardscape? Any open space analysis which favors development as "open space" over the existing coastal environment is suspect under the goals and requirements of CEQA as evidenced by the California legislature, as described above in this letter.

Response to Comment PC333-18

As described in Chapter 2, Project Description of the Draft EIR, the determination of what constitutes open space is based on the City's Zoning Code (RBMC Section 10-5.813[a][1]) and 10-5.814[a][1]), and includes the pedestrian/bicycle pathways that are a minimum of 10-feet in width, public plazas, landscaped areas that not fenced or gated and are a minimum of 10-feet in width, open areas on the piers, and Seaside Lagoon. To be eligible for a floor area ratio bonus, a project should provide open space that is "high quality" as defined under RBMC Section 10-5.813[a][1)c) and 10-5.814[a][1)c. The same criteria of what is considered open space are

used to assess the amount of existing and proposed open space. As described in Section 3.3.2.2 in Section 3.3, Biological Resources of the Draft EIR, the land portion of the existing site is a developed area that is highly disturbed. As shown in Figures 2-7 and 2-21 respectively in Chapter 2, both existing and proposed open space is primarily comprised of hardscape areas (i.e., public walkways and piers), ornamental landscaped areas, and Seaside Lagoon.

Comment PC333-19

Traffic and Transportation

The DEIR identifies significant adverse impacts to Redondo Beach and adjacent communities in the areas of traffic and transportation, despite minimizing the impacts to bicyclist circulation. In fact, impacts may be understated. It is not clear whether weekend or weekday traffic was assessed. The DEIR indicates that the number of trips to the Project site is expected to more than double. (3.13-56) The coastal area has limited access points, most of which go through residential communities. Many streets are already highly impacted and the proposed mitigations will only serve to frustrate drivers, exposing pedestrians and cyclists to greater dangers as a result.

Parking as proposed is thought to be inadequate, due to the vast increase in retail, office and other commercial uses, much of which is unrelated to the waterfront.

The significant inadequate parking impacts as well as the very significant impacts to traffic and transportation should be mitigated by reducing or eliminating non-waterfront-related commercial uses, a mitigation measure or alternative project not offered in the DEIR.

Response to Comment PC333-19

As described in Section 3.13 of the Draft EIR (on page 3.13-81), a major component of the proposed project is improved site connectivity within the pier and harbor area and the surrounding uses. Site connectivity improvements include new and enhanced pedestrian and bicycle pathways, many of which are separated from vehicular traffic, a pedestrian/bicycle bridge across the Basin 3 entrance, and the reconnection of Pacific Avenue from Harbor Drive to Torrance Circle. Implementation of the proposed project would further enhance the bicycle and pedestrian environment, providing even more favorable conditions for bicycling and walking. While the project will introduce new vehicular crossing locations for bicyclists and pedestrians 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 (where feasible). Based on the analysis in the Draft EIR (Section 3.13), 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. As such, the impacts of the project would be less than significant. Therefore, the proposed project is not expected to significantly impact bicyclist (nor pedestrians).

While Section 3.13, Traffic and Transportation of the Draft EIR 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. In addition, please see Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for more information on weekend traffic.

The commenter asserts that parking impacts can be mitigated by reducing or eliminating non-waterfront-related commercial uses.” Regarding parking, see Master Response #7: Waterfront Parking. Impacts associated with parking have been reduced to less than significant, consequently additional mitigation measures are not required. The Draft EIR includes a Reduced Density alternative in Draft EIR Chapter 4. To the extent the commenter is implying an inconsistency between the proposed uses and permissible zoning, please see Draft EIR Section 3.9 which provides an overview of the project’s consistency with the Local Coastal Program.

Comment PC333-20

Land Use and Planning

“Consistent”, “consistent”, “consistent”--the DEIR unabashedly rubberstamps the entire Proposed Project as consistent with all land use and planning documents. The California Coastal Act mandates the protection, conservation, restoration, and enhancement of the State's coastal resources. Indeed the coastal resources that the Act seeks to protect and enhance are public access, low-cost visitor- serving recreational uses, and visual resources, most of which are given short shrift by the Proposed Project.

Consistency with the Coastal Act, the City's General Plan, and Coastal Land Use Plan requires coastal- related uses in the area east of Seaside Lagoon and north of Basin 3. The "new main street flanked by commercial uses" (3.9-28) does not appear to be consistent. Moreover, it's hard to imagine that the coastal-related use mandate anticipates enhancement by installations such as movie theaters.

Measure G used the approved Heart of the City Environmental Impact Report as its CEQA impact assessment. That EIR included specific mitigations and requirements that were not incorporated into this Proposed Project and portions the DEIR conflict with that EIR.

Response to Comment PC333-20

As discussed in Section 3.9, Land Use and Planning of the Draft EIR, implementation of the California Coastal Act policies is accomplished through the City’s certified LCP. Section 3.9 describes how the proposed project is consistent with the policies and development standards set forth in the LCP, and the commenter does not introduce new information that directly challenges the information presented in the Draft EIR. The proposed project does continue to provide for public access to and throughout the project site (including improved pedestrian and bicycle connections), it continues to provide low-cost visitor-serving recreational uses (including removing an admission fee for Seaside Lagoon and retaining and enhancing places for people to walk, bike, and access the waterfront) and visual resources (by enhancing the promenade by the water’s edge and providing enhanced public seating and gathering spaces where the public can experience the coastal setting).

It is unclear to what requirement the commenter is referring to that requires coastal- related uses in the area east of Seaside Lagoon and north of Basin 3. As detailed on Table 3.9-1 in Section 3.9, the LCP, General Plan, and Coastal Zoning (which is part of the LCP) uses allowed within the project site, including the area referenced by the commenter, includes a variety of coastal–related and coastal compatible uses, such as local and visitor-serving retail uses, restaurants, entertainment clubs, and office uses (subject to some restrictions).

The commenter also asserts that “it’s hard to imagine that the coastal-related use mandate anticipates enhancement by installations such as movie theaters.” The City’s Local Coastal Program, which was certified by the California Coastal Commission, approved by the Redondo Beach electorate, and approved by the City

Council expressly allows for theaters and cinemas. (RBMC Sections 10-5.810 and 10-5.402(a)(50).) 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 Response to Comment PC323-28 regarding the Heart of the City EIR.

Comment PC333-21

California State Lands Commission

Exchange of Basin 3 for a stretch of tidelands currently held in public trust would remove important protections that the California State Lands Commission provides and, thus, such removal would be a significant, adverse impact to the public.

Response to Comment PC333-21

Impacts under CEQA are based upon physical changes to the environment. As discussed in a leading CEQA treatise "[a]n inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment. See *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170..." (Kostka & Zischke, *Practice Under the California Environmental Quality Act*, (2d ed Cal CEB, March 2016 Update), p. 12-44, Section 12.34; see also CEQA Guidelines Section 15126.2.) The physical environmental impacts associated with the proposed project have been described in Draft EIR Sections 3.1 through 3.14. Nevertheless, consistency with the Public Trust Doctrine was discussed on Draft EIR page 3.9-29. As discussed therein:

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.

Comment PC333-22

Alternatives

The final EIR should provide an alternative to the Proposed Project that reduces density and massing and their adverse impacts along the coastline, reduces the emphasis on commercial enterprise non-dependent on and unrelated to the coastline or waterfront, and increases public coastal-dependent and coastal-related recreational opportunities. Alternative 7 may accomplish some of these goals, yet neglects others. Had the DEIR properly evaluated the elements described in this letter, above, including impacts to aesthetic and visual resources and recreation resources, perhaps Alternative 7 would have been designed to reduce such impacts. By denying the existence of such impacts, this opportunity was lost.

Response to Comment PC333-22

As noted in the comment, Alternative 7 – Reduced Density is a reduced project alternative; Alternative 2 – Necessary Infrastructure Improvements also addressed a reduced project (see Chapter 4, Analysis of Alternatives in the Draft EIR). Please see Response to Comments PC333-3 through PC333-18, which address the comments on aesthetics and visual resources and recreational resources. The Draft EIR presents a reasonable range of alternatives, which is all that is required under CEQA. (CEQA Guidelines Section 15126.6(a) [“An EIR need not consider every conceivable alternative to a project.”].) The commenter expressly acknowledges that Alternative 7 is similar to the conceptual alternative contemplated by the commenter. As discussed by the Court of Appeal “there are literally thousands of ‘reasonable alternatives’ to the proposed project...But, no one would argue that the EIR is insufficient for failure to describe the alternative [suggested in the comment letters].” (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022.)

Additionally, see Response to Comment PC323-35 regarding the analysis of alternatives.

Comment PC333-23

Summary

The DEIR should be redone and re-circulated. The Proposed Project has significant impacts that are not identified and/or not adequately analyzed. First and foremost, the Proposed Project fails to honor the Coastal Act and the public interest in protecting limited coastal resources. The Proposed Project would be a mall of buildings with a road through it on the waterfront. That type of development belongs in the urban interior rather than on the waterfront. The DEIR fails to address this issue.

Response to Comment PC333-23

As addressed in Response to Comments PC333-2 through PC333-22 above, the commenter does not provide a sufficient basis for showing that the impacts are greater than presented in the Draft EIR and thus, no recirculation of the EIR is required. Regarding the consistency with the Coastal Act, see Response to Comment PC333-20. Additionally, see Section 3.9 regarding the proposed project’s consistency with applicable policies and development regulations for the project site.

Comment PC333-24

The DEIR must examine more critically the visual and aesthetic impacts of the Proposed Project, including justification for the scale of the project and the non-coastal-related uses planned for the site; including many more observation points from public places where there are existing views of the water; and including building elevations in order for the public to better evaluate the Proposed Project’s view impacts. It must also include more extensive traffic analysis, particularly analysis of the traffic interaction with cyclists.

Response to Comment PC333-24

Please see Response to Comments PC333-3 through PC333-7 above and Master Response #9: Views and Scale of Development regarding visual and aesthetic impacts, including locations selected for a view analysis and building elevations. Regarding the uses planned for the project site, please refer to the analysis in Section 3.9, Land Use and Planning of the Draft EIR, and Response to Comment PC333-20 above. Please see Response to Comment PC333-19 above regarding the traffic analysis.

Comment PC333-25

We believe that a more comprehensive and objective DEIR will reveal significant impacts which will call for an alternative to mitigate those impacts. Such an alternative should enlarge the Seaside Lagoon to at minimum retain its existing size. The Proposed Project structures overall should be downsized significantly, locating buildings to retain, enhance, and expand views and offering more open space for the public to enjoy the open waterfront. The proposed re-routing of the South Bay Bikeway should remain on the water side of Pacific, with water views and without crossing two lanes of car traffic. The 12-foot wide walkway along the waterfront should be widened to accommodate cyclists on their bikes, rather than expecting cyclists to dismount and walk through the development.

Response to Comment PC333-25

As described in Response to Comments PC333-2 through PC333-22 above, the commenter does not provide a sufficient basis for showing that the impacts are greater than presented in the Draft EIR; nonetheless, the commenter's opinion on the Draft EIR will be included in the Final EIR presented for review and consideration by the City's decision-making body. Please see Response to Comment PC333-16 regarding the bicycle path and pedestrian promenade. Please see Master Response #4: Modifications to the Seaside Lagoon and Master Response #9: Views and Scale of Development.

Comment PC333-26

Last, mitigation for the significant construction impacts must be offered. In particular, it is unreasonable to re-route bicycle and pedestrian traffic uphill around the back side of the village for nearly three years and consider this an insignificant impact. A temporary, flat route should be made available through the construction zone.

Response to Comment PC333-26

Please see Response to Comment PC333-17 regarding construction impacts to the bicycle route. Impacts would be less than significant and therefore, no mitigation is required.

COMMENT LETTER NO. PC334**ALEXANDRA WEYMAN – UNITE HERE!
LOCAL 11****Comment PC334-1**

On behalf of over 20,000 hospitality and food service members in Unite Here! Local 11 represents in Los Angeles and Orange County, we write to express concern about the DEIR for the Waterfront Redevelopment Project.

We have concerns about ensuring that the redeveloped Waterfront is both accessible and affordable for everyone. As a requirement of the Coastal Act, the Waterfront Redevelopment Project must ensure public access to the Waterfront, in addition to access to recreational activities and affordable accommodations. We have concerns that the proposed boutique hotel will impact accessibility to working families. The City may want to consider levying in lieu fees if the boutique hotel is not affordable to persons of low to moderate incomes.

Lastly, we have concerns about the DEIR findings that the project will have a less than significant impact on parking and traffic. We are concerned that there will be an inadequate amount of parking at the proposed project, and that traffic will have a significant impact on the surrounding community.

Response to Comment PC334-1

As for the projects ability to attract a variety of patrons and businesses, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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. 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 California Coastal Act. In addition, all development at the project site requires a coastal development permit, pursuant to the Local Coastal Program. Per CEQA, the Draft EIR addresses environmental impacts, and not financial or business issues (such as fees and taxes). Furthermore, the City's existing coastal zoning regulations already provide in-lieu fee payments to support lower cost visitor accommodations, as provided under RBMC Section 10-5.811(b)(8).

As for the commenter's general statement about traffic, 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. Parking is addressed in Section 3.13 and Master Response #7: Waterfront Parking. 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. PC335

WALT MEADOWS

Comment PC335-1

Please keep or maintain the pier. History and character can not be replaced or replicated. This pier is unique and keeps Redondo Beach that way. Polly's brings back so many memories for so many people.

Response to Comment PC335-1

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. PC336

DELIA A. VECHI

Comment PC336-1

Please, I would appreciate that acknowledge me that you have received my concerns about the Waterfront DEIR.

Response to Comment PC336-1

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 PC336-2

MY FINDINGS * QUESTIONS TO THE WATERFRONT DEIR

ES.8 PUBLIC COMMENTS

ES.1 Issued Raised

It was not mentioned on the list of public comments: the effect of the changes in the sea level, and the rising temperatures. They were, and still are, very serious concerns. I have addressed them in front of the City Council and I have sent two “e-letters” to the City Planning Department, to the attention Mr. Aaron Jones, and cc to Katie Owston dated: July 10, 2014 and a second one dated: July 18, 2014. Those letters were sent by me during the review period.

Why this **critical** subject **was not included** on in ES.1 as part of the issues raised by the public?

Response to Comment PC336-2

As indicated in Section ES.8.1 of the Executive Summary, approximately 260 comment letters were received during the scoping process. Due to the amount of comments received, this section provides only a general summary of the majority of the issues raised during the scoping process, with the scoping response letters made available as Appendix A of the Draft EIR. Sea level rise was analyzed in detail in Section 3.8, Hydrology and Water Quality, and climate change was addressed in Section 3.6, Greenhouse Gases.

Comment PC336-3

TRAFFIC AND TRANSPORTATION

TRA: After reading the list of the Mitigation Measures I **do not believe** that the impact after these mitigations “is **less than significant**”.

The congestion of vehicles during the weekends and summer time would be so tremendous [worse than now] and the only mitigation possible would be **off-site or remote parking**. This is true not only for the **employees** but also for the **visitors**. Non-polluting Electrical Shuttles would be required to take visitors, shoppers, or employees that prefer not to walk or who are mobility impaired to the harbor.

That leaves the **minimum parking** required for deliveries, maintenance, or boats [for use the boat ramp] only...which severely restricts [impacts] parking uses allowed on site.

The Dirt Farm is the ideal site to build the off-site Parking Structure. It’s located behind the Post Office, across the street of a car wash and the Public Storage Buildings. Also, it is near the corner of Pacific Coast Hwy. and Herondo (Anita- 190th). This location would stop most of the traffic into the waterfront and leave it more pedestrian in nature, UNLESS, the AES site is developed to their proposed HIGH Density which further exacerbates the parking issue for the Harbor Area.

Response to Comment PC336-3

The commenter asserts that traffic would not be less than significant with the mitigation proposed; however, the commenter does not provide any studies or information to back up the opinion. The commenter’s opinion is noted. Draft EIR Tables 3.13-23, 3.13-24, 3.13-25, 3.13-36, 3.13-37, and 3.13-38 provide the calculations to

confirm the efficacy of the proposed mitigation measures. Please also refer to Section 3.13, Traffic and Transportation of the Draft EIR, as well as Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project regarding the traffic analysis (including weekend traffic), and Master Response #7: Waterfront Parking regarding on-site parking for employees and visitors. As for a trolley, 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 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. Furthermore, operational air quality impacts were determined to be less than significant. In addition to the adjacent residential land uses that could walk to 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. Regarding the AES site, refer to Master Response #1: AES Power Plant Site. The commenter's suggests including parking at "the Dirt Farm." The commenter appears to be referencing the Southern California Edison right of way, which is located approximately 0.65 mile northeast of the project site; please see Response to Comment PC272-1 for discussion of off-site parking alternatives.

Comment PC336-4

AESTHETICAL AND VISUAL RESOURCES

AES - Proposed project

Why is there **no impact** and why **does it not require the potential Mitigation Measures be evaluated here?**

One example only: **the parking structure that** is planned to be located **across from the Crown Plaza Hotel** and the newly remodeled **El Redondo Hotel** will **block** all the **views** of the harbor, Palos Verdes Peninsula, the ocean, etc.

See my comments on Traffic and Transportation, which eliminate the proposed parking structure for that corner.

Response to Comment PC336-4

Please refer to Master Response #9: Views and Scale of Development regarding the aesthetics and visual analysis. Refer to Master Response #7: Waterfront Parking regarding the need for on-site parking.

Comment PC336-5

HYDROLOGY AND WATER QUALITY

HWQ-5 "The proposed project would expose people and structures to substantial risk associated with inundation by seiche, tsunami, mudflow or sea level rise" according to the statements in the DEIR.

The DEIR conclusion is that the "**impact** determination is **significant**". The aggravation is that after the entire list of the Mitigation Measures, the impact still is "**significant** and **unavoidable-operation** (tsunami)".

I have been an eye witness of many natural disasters that **have not been mentioned** in the DEIR which have taken place in our Waterfront. I can mention few examples of those calamities concentrating only in the following: **liquefaction, high tides, storm surges and flood:**

January 1988 * A big **Storm** along the Southern California coast caused great damages, but the large concentration of destruction occurred in Redondo Beach. The beaches were flooded, hotels and business destroyed... with a cost estimated of about \$16,000,000 of 1988 dollar value.

1990 * **Heavy winter storm** wash out part of the Redondo Beach Road South.

January 1994 * The Northridge earthquake cause liquefaction in King Harbor that severely damaged pylons, cause settlement of some buildings, a retaining concrete wall...

2014 * **Storm** destroyed Redondo Boardwalk.

JANUARY 2016 * **El Nino** struck again with heavy waves and some damages occurred.

Why are these documented natural phenomes **not mentioned in the DEIR** when they are a matter of Public Record in recent times, especially when the damages from them **are known?**

Those are the consequence of the **climate change**.

Conclusion: because the above phenomenons are irreversible, NOW is the opportunity to stop Centercal's over-development along the Harbor, and reduce the risk of future threats of life and property.

It seems very unusual, that the DEIR does not seek to protect life, and business investment. I did not find a mention of the cost of potential or known past local disasters or referenced in the DEIR. For example, who pay for the loss of the proposed development in the event one, does, and will occur? If the taxpayers of Redondo Beach are on the hook for rebuilding, restoring Centercal's development it will have city wide economic consequences beyond the area of the Project?

Response to Comment PC336-5

Draft EIR Sections 3.5 and 3.8 include a detailed discussion of the existing hydrological and geological conditions on the project site. This includes discussion of the 1988 "major storm and subsequent fire." (Draft EIR page 3.5-27.) Existing liquefaction conditions were discussed on Draft EIR page 3.5-17, which notes that "[d]uring the 1994 Northridge earthquake, liquefaction settlement was observed at King Harbor Mole B (Basin 2) parking lot." As for the commenter's assertion that storms in 1990 and 2014 caused damage to the Redondo Beach Road South and Redondo Boardwalk, respectively, the City is unaware of these specific events. Section 3.8 also discusses existing conditions, and notes that the project site is currently subject to wave overtopping. (Draft EIR page 3.8-3.)

As detailed in Section 3.8, Hydrology and Water Quality, as with the entire west coast of California, the project site is currently located within a tsunami-induced inundation zone for a tsunami originating in the coastal waters of California according to the California Governor's Office of Emergency Services. Implementation of the proposed project would increase the elevation of a portion of the northern portion of the project site, which would reduce, to some degree, the potential for hazards and damage associated with a future tsunami or seiche event compared to existing conditions. Although the City has developed an emergency evacuation route and

other emergency procedures for its coastal areas to address potential risks associated with tsunamis and mitigation is proposed, which would reduce impacts, due to natural uncertainties of such an event occurring in the future, it is not possible to conclude that the associated risks would be fully mitigated. As such, the residual impact associated with tsunami or seiche exposure is considered to be significant and unavoidable.

As for sea level rise, this issue is also an existing concern that occurs in coastal waters, however the exact extent and timing is unknown. The future sea level rise projections recommended by the California Ocean Protection Council represents a range of high, mid-level, and low projections. Based on the range, a potential sea level rise of between 0.23 feet to 1.1 feet could occur by Year 2040 and 0.99 feet to 4.5 feet by Year 2090. Sea level rise would increase the potential for wave overtopping to occur. As concluded in Section 3.8 of the Draft EIR, notwithstanding that there are many unknowns associated with sea level rise, impacts are considered significant; however, with mitigation measure MM HWQ-3: Sea Level Rise Adaptation Plan, impacts associated with sea level rise would be reduced to less than significant. This approach is considered conservative, as the Court of Appeal has determined the CEQA analysis of the Playa Vista project, near Venice, did not have to include an analysis of sea-level rise, because sea-level rise isn't caused by the project. (*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.”].) For discussion of climate change, please also see Draft EIR Section 3.6.2.

The commenter suggests that the solution to climate change is to stop development of the project. However, as discussed in Draft EIR page 3.6-6, one of the goals of the California Legislature is to reduce greenhouse gas emissions by providing infill development, with access to transit, pedestrian, and bicycle facilities, to reduce reliance upon personal vehicles (Senate Bill 375). As noted on page 3.6-7, the project results in a reduced per service population GHG emissions and provides users of the project site numerous modes of transportation that are not reliant upon personal vehicles.

As provided 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. The financial responsibility aspects of this project are not directly related to CEQA (and therefore the Draft EIR). (CEQA Guidelines Section 15131(a).) For discussion of Urban Decay, please see Draft EIR Chapter 5.

Comment PC336-6

Send the proposed project back to the drawing board.

Response to Comment PC336-6

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. PC337

LAURA D. ZAHN

Comment PC337-1

Please find attached a response to the DEIR report

LAND EXCHANGE OR LAND LOST?

California Public Resources Code – PRC Section 6307

Section 6307. (Repealed and added by Stats. 2005, Ch, 585.Sec 3.)

Cite as: Cal. Pub. Res. Code Ss 6307

- a. The commission may enter into an exchange, with any person or any private or public entity, of filed or reclaimed tide and submerged lands or beds or navigable waterways, or interest in these lands, that are subject to the public trust for commerce, navigation, and fisheries, for other lands or interests in lands, if the commission finds that all of the following conditions are met:
- 1) The exchange is for one or more of the purposes listed in subdivision (c).
 - 2) The lands or interests in lands to be acquired in the exchange will provide a significant benefit to the public trust.

THE PUBLIC TRUST PURPOSES ARE: COMMERCE, NAVIGATION, FISHERIES. THE EXCHANGE LAND, WHICH IS BASIN 3- ALREADY SUPPORTS THESE PUBLIC TRUST PURPOSES. NO NEW OR ADDITIONAL PUROPSES WILL BE SIGNIFICANTLY PROVIDED.

- 3) The exchange does not substantially interfere with public rights of navigation and fishing.

THIS EXCHANGE WILL SUBSTANTIALLY INTERFERE WITH PUBLIC RIGHTS OF NAVIGATION AND FISHING. (1) BY PLACING AN “ ON DEMAND” DRAW BRIDGE THAT WILL RESTRICT ENTRANCE AND EGRESS OF ALL THE BOATS IN BASIN 3 WHILE PEDESTRAINS PASS OVER, AND THEN AFTER A CERTAIN TIME IN THE EVENING, WILL BE PERMENTALLY IN A DOWN POSITION. (2) BY POSSIBLY REMOVING THE PUBLIC FISHING PIER KNOWN AS POLLY’S WHICH IS WHERE THE WHALE WATCHING BOATS AND THE SPORTS FISHINGS BOATS DEPART FROM ALONG WITH THIS PIER BEING A YEAR-ROUND FAMILY PIER, IT IS ALSO A LANDMARK FOR LOCALS AND TOURISTS, IT ALSO PROVIDES OCEANVIEW DINING, AND AN AUTHENTIC PLACE TO VIEW AND OBSERVE WILDLIFE AND THEIR HABITATS OUT IN NATURE ALONG WITH BEING A “WOODEN PIER” AND A PLACE FOR GOOD-OL-FASHIONED SPORTFISHING.

- 4) The monetary value of the lands or interest in lands received by the trust in exchange is equal to or greater than that of the lands or interests in lands given by the trust in exchange.

THERE IS NO PRICE TAG THAT CAN BE PLACED ON SEEING AND EXPERIENCING NATURE IN THEIR OPEN HABITATS, OF WATCHING YOUNG AND OLD FISHERMEN BEING THRILLED BY CATCHING A FISH, OR JUST REMEMBERING THE DAYS WHEN LIFE WAS SIMPLER AND LESS CONCRETE AND STERILE. IF THIS EXCHANGE GOES, THROUGH AND THE TIDELANDS ARE GIVEN TO A DEVELOPER WHO COULD REDUCE/REMOVE OR RUIN/ THEM ALONG WITH THIS PUBLIC FISHING PIER THE LOSS OF THIS PIER WILL RESULT IN A “UNIQUE PIECE OF SOUTH BAY HISTORY” BEING GONE FOREVER. NOTHING NOT EVEN A PLAQUE ON A WALL OR SOME OTHER BUSINESS CALLED POLLY’S CAN BRING BACK WHAT WILL BE LOST

- 5) The lands or interest in lands given in exchange have been cut off from water access and no longer are in fact tidelands or submerged lands or navigable waterways, by virtue of having been filled or reclaimed, and are relatively useless for public trust purposes.

AS STATED IN (4) THE TIDELANDS ARE ANYTHING BUT USELESS. IN FACT THEY PROVIDE EXACTELY WHAT THE PURPOSE OF THE PUBLIC TRUST WAS CREATED FOR TO; KEEP THESE LANDS TO BE FOREVER HELD BY SAID CITY, AND BY ITS SUCCESSORS, IN TRUST FOR THE USES AND PURPOSES, AND UPON THE EXPRESS CONDITIONS...SOLEY FOR THE ESTABLISHMENT, IMPROVEMENT AND CONDUCT OF A HAROR...PROTECTION OF LANDS...CONSTRUCTION OF WHARVES, DOCKS, PIERS, SLIPS...NECESSARY FOR THE PROMOTION OR ACCOMODATION OF COMMERCE AND NAVIGATION. AS IT IS NOW, THE LAND SHALL ALWAYS REMAIN A PUBLIC HARBOR FOR ALL PURPOSES OF COMMERCE AND NAVIGATION. TO GO ON... IN THE MANAGEMENT, CONDUCT OR OPERATION OF SAID HARBOR, OR ANY OF THE UTILITIES, STRUCTURES OR APPLIANCES MENTIONED IN (A), NO DISCRIMINATION IN RATES, TOLLS, OR CHARGES, OR IN FACILITIES, FOR ANY USE OR SERVICE IN CONNECTION THEREWITH SHALL EVER BE MADE, AUTHORISED OR PERMITTED BY SAID CITY OR BY ITS SUCCESSORS. THE ABSOLUTE RIGHT TO FISH IN THE WATERS OF SAID HARBOR, WITH THE RIGHT OF CONVENIENT ACCESS TO SAID WATERS OVER SAID LANDS FOR SAID PURPOSE, IS HEREBY RESERVED TO THE PEOPLE OF THE STATE OF CALIFORNIA.

THIS DEVELOPMENT, WITH ITS HIGH PRICED PARKING, HIGH PRICED SHOPPING, HIGH PRICED RESTRAUANTS, HIGH PRICED MOVIE THEATER, HIGH PRICED HOTEL .WILL CREATE “ HIGH PRICED ACCESS” TO OUR STATE MANDATED LANDS. IT WILL CREATE A “ LIFE CENTER” FOR THE RICH AND FAMOUS AND WILL DISCRIMINATE ON THE BASIS OF INCOME AS TO WHO CAN ACCESS THIS LOCATION OF THIS CITY BY THE SEA.

- 6) The exchange is in the best interest of the state.

THIS EXCHANGE IS ONLY IN THE BEST INTEREST OF CENTERCAL OR WHOEVER THEY SELL THE PROJECT OF TO. NOT THE PEOPLE OF THE STATE OF CALIFORNIA.

- b. Pursuant to an exchange agreement, the commission may free the lands or interest in lands given in exchange from the public trust and shall impose the public trust on the lands or interest in lands received in exchange.

IF THIS EXCHANGE GOES THROUGH, THE STATE WILL NOW HAVE CONTROL OVER BASIN 3 BECAUSE IT WILL NOW BE PUBLIC TRUST LANDS. WHO IS TO SAY THAT LATER ON DOWN THE ROAD SOME OTHER DEVELOPER FROM SOME OTHER LOCATION IN THE STATE OF CALIFORNIA DOES NOT WANT TO “EXCHANGE” BASIN 3 FOR SOME OTHER LAND ELSEWHERE IN THE STATE.

THIS WOULD THEN ALLOW THAT NEW DEVELOPER TO MAKE ANY CHANGES THEY SO CHOOSE TO BASIN 3.

- c. An exchange made by the commission pursuant to subdivision (a) shall be for one or more of the following purposes, as determined by the commission:

AFTER READING CALIFORNIA PUBLIC RESOURCES CODE SECTION 6307, I DO NOT SEE THAT ANY OF THE CONDITIONS ARE GOING TO BE MET BY CENTERCAL OR POSSIBLY ANYONE THAT THEY COULD SELL THE PROJECT OFF TO.

- 1) To improve navigation or waterways.

AS IT HAS BEEN STATED...NOTHING THAT CENTERCAL WILL BE DOING WITH THIS PROJECT ANYWHERE ON THE PROJECT SITE BUT ESPECIALLY IN THIS EXCHANGE AREA WILL IMPROVE NAVIGATION OR WATERWAYS.

- 2) To aid in reclamation or flood control.

THERE IS NOTHING THAT WILL BE DONE TO THE PROJECT SITE THAT WILL AID IN RECLAMATION OR FLOOD CONTROL THAT HAS NOT ALREADY BEEN DONE BY THE CITY

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

THERE IS CURRENTLY NO PHYSICAL RECONFIGURATION OF THE SHORELINE BEING DISCUSSED AT THIS TIME, HOWEVER, ONCE THE EXCHANGE GOES THROUGH IT COULD HAPPEN.

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

NOTHING IS CURRENTLY PLANNED THAT WILL ENHANCE PUBLIC ACCESS TO OR ALONG THE WATER. IN FACT IT COULD RESTRICT OR REMOVE PUBLIC ACCESS TO THE WATER.

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

THE PUBLIC TRUST PURPOSES ARE; COMMERCE, NAVIGATION, FISHERIES NOT ...SHOPPING , EATING, MOVIE GOING. NOTHING IN THIS PLAN FROM CENTERCAL DOES ANYTHING TO ENHANCE THE PUBLIC TRUST PURPOSES.

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

NOTHING IN THIS PLAN FROM CENTERCAL WILL PRESERVE, ENHANCE, OR CREATE ANYTHING OF NATURE OR THE NATURAL ENVIRONMENT. IT WILL ADD MORE CONCRETE, MORE CONGESTION, MORE TRASH, MORE WASTE, MORE TRAFFIC, NOT TO MENTION A HUGH CARBON FOOTPRINT.

Response to Comment PC337-1

The comment asserts that the proposed Tidelands Exchange and development would be inconsistent with the City's Tidelands grant. The regulations associated with the proposed exchange are discussed in Section 3.9.3.1. As discussed on Draft EIR page 3.9-29:

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.

As noted in Draft EIR Section 4.4.4.1, an alternative without the land swap would result in the reconfiguration of structures on the project site. As described in Section 3.9, Land Use and Planning and Chapter 4 Analysis of Alternatives of the Draft EIR, regardless if the land swap is approved by the California State Lands Commission, the proposed uses on Mole D are consistent with the Public Trust. As discussed in Section 3.9.4.3.2 in Section 3.9, 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. However, under the current tidelands and uplands configuration, the proposed market hall could not be constructed as shown on the conceptual plan (Figure 2-8 in Chapter 2, Project Description of the Draft EIR) because it would be located across both the uplands and tidelands areas. The proposed land exchange would allow the entire building to be located in one area. As shown on Figure 4-2 in Chapter 4, Analysis of Alternatives of the Draft EIR, if the land exchange is not approved, the proposed conceptual alternative plan would reconfigure the market hall so that it would not be located across the tidelands and uplands boundary, and instead a larger building would be located in the uplands and a smaller building would be located in the tidelands.

The commenter makes statements about Basin 3 already supporting public trust purposes. This relates to the reason for the tidelands property exchange, which would correct the boundary that has Basin 3 as uplands and Mole D land as tidelands (see Figure 3.9-2 of the Draft EIR). The Public Trust Doctrine applies to lands such as tide and submerged lands and the beds of navigable waterways, which, under the current configuration of the harbor, more appropriately applies to Basin 3, than Mole D. Mole D is no longer tidelands, submerged lands or a navigable waterway, while Basin 3 is both submerged land and a navigable waterway. Therefore, the land exchange would enhance the physical configuration of the trust land.

As described in Chapter 2, Project Description of the Draft EIR, the Tidelands held in trust by the City are based on the mean high tide line (MHTL) designated in 1935, prior to the construction of King Harbor in its current configuration, including the excavation of Basin 3 and the filling of Mole D. The Public Trust Doctrine applies to lands such as tide and submerged lands and the beds of navigable waterways, which, under the current configuration of the harbor, more appropriately applies to Basin 3, than Mole D. Mole D is no longer tidelands, submerged lands or a navigable waterway, while Basin 3 is both submerged land and a navigable waterway. Therefore, the land exchange would enhance the physical configuration of the trust land.

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, all parts of the proposed exchange of the land (including monetary value) 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 Section 6307.

The proposed project's land exchange would not remove breakwaters, nor would it remove coastal zone or other land use protections for the area. The land exchange (as shown with Alternative 4 – No Property Exchange with State, detailed in Chapter 4, Analysis of Alternatives of the Draft EIR), affects lease lines and not the proposed uses, which must meet the requirements of Public Resources Code Section 6307. Under (c)(5), the commenter mentions commerce as a public trust purpose, which is consistent with retail and restaurant uses. However, the commenter incorrectly notes that the specialty cinema is occurring within the Tidelands trust area; the specialty cinema is outside of the Tidelands trust area. Please also see Response to Comment PC323-96 for discussion of bridge operations and Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

COMMENT LETTER NO. PC338

MYRNA MENDOZA

Comment PC338-1

As a 18year resident in Redondo Beach, I am very concerned about the potential negative impacts of CenterCal's proposed waterfront development. Here are my comments to some of the 14 resource areas that were analyzed in the Waterfront Draft (EIR).

NO

3-story 1.43 acre parking structure
 reduction/relocation of Seaside Lagoon
 Boutique Hotel
 Vehicle Through-Way Pedestrian
 Draw-Bridge
 Loss of Boat Slips
 Loss of Boat Trailer Parking
 Movie Theater
 2-Football Field Sized "Open-Air Markets"
 City Funding to remove existing parking structure
 R.B. City Motto: More to Sea Not More to Shop

YES

live with more open space along our waterfront
 reduce carbon footprint of concrete, cars, congestion
 keep our existing boat slips and boat trailer parking
 keep more small, independent stores and shops in tow
 keep the saltwater lagoon affordable for everyone to enjoy
 offer space for more festivals/fairs/food trucks

>

Response to Comment PC338-1

Your opinions will be included in the Final EIR presented for review and consideration by the City's decision-making body. Please also see Response to Comments PC323-73 and PC323-96 for discussion of the proposed boat slips and bridge. As discussed in Draft EIR page 3.6-6, one of the goals of the California Legislature is to reduce greenhouse gas emissions by providing infill development, with access to transit, pedestrian, and bicycle facilities, to reduce reliance upon personal vehicles (Senate Bill 375). As noted on page 3.6-7, the project

results in a reduced per service population GHG emissions and provides users of the project site to numerous modes of transportation that are not reliant upon personal vehicles.

Comment PC338-2

Traffic congestion

> -- The proposed building of hotel(s), cinema, boutiques, and new restaurants will aggravate an already-existing traffic congestion. A traffic study which would show the traffic patterns for the last ten years would at least provide an overview of the actual increase of traffic due to property development in the area and its most adjacent proximities. Re-connection to Pacific Avenue will do very little to mitigate the negative impact of traffic congestion.
>

Response to Comment PC338-2

The traffic analysis in the Draft EIR (Section 3.13 and Appendix L1) assumed the appropriate existing conditions associated with the adjacent roadways over the appropriate period of time. The Pacific Avenue Reconnection would be 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.

The comment also asserts that a traffic study should be prepared which “show the traffic patterns for the last ten years.” As noted in Draft EIR page 3.13-13, “[t]o characterize the existing intersection operating conditions, weekday morning and afternoon peak period intersection turning movement counts were conducted at the study intersections in the summer of 2013 and the spring of 2014. The maximum peak hour traffic volumes for each intersection from the combined data sets were selected to reflect peak volumes at each intersection regardless of the season.” The City made reasonable assumptions regarding traffic, nevertheless the City notes that in 2007, the intersection of Pacific Coast Highway and Torrance Boulevard had a volume/capacity (V/C) ratio of 0.893 and 0.907 in the AM and PM peak hour, respectively.⁷⁰ In 2014, that intersection had a V/C ratio of 0.818 and 0.848 in the AM and PM peak hour, indicating that operating conditions have improved over the seven-year period.

Comment PC338-3

> Alternatives #1 to #7
> -The presentation did not provide an analysis with any full scope of detail in comparison to the extensive amount of information presented on the development proposal.
>
> Need versus Greed

⁷⁰ Redondo Beach Circulation Element, November 2009, Table 3 page 19.

> - Although there are obvious and compelling needs to bring about improvements to the Waterfront in terms of pier parking structure and necessary infrastructure improvements to enhance recreational options, this project as currently presented is largely focused on overdeveloping so that a private enterprise can create profits at the expense of there being a need for improvements.

There seems to be a deliberate focus on emphasizing how undesirable the Pier looks and how the proposed development will change that; however, the proposed project's solution is that of overdevelopment which will bring negative results in terms of ignoring economic feasibility. Many potential property lease tenants, consumers, and business owners will not be able to sustain the operational expenses when they see their profit margins slowly evaporating.

>

Response to Comment PC338-3

The Draft EIR provides a 432 page analysis of Alternatives, which is provided in Draft EIR Chapter 4. Furthermore, 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 commenter also asserts that the project site is being overdeveloped. As discussed in Draft EIR Section 2.1.1.5.8, the proposed development on the site has already been significantly reduced from its first zoning proposal in 2007 [the original proposal included up to 750,000 additional square feet]. 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.” This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles.

As for the projects ability to attract businesses, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Please also see Draft EIR Chapter 5 for discussion of Urban Decay.

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 PC338-4

> Retail and Hotel
> - There will be excessive property building as there is no need for any more retail or hotels; and, the need for improvements or any repairs required on the Waterfront cannot be held hostage by the developers' proposal which will never consider any other option but profits and more profits.

Response to Comment PC338-4

As for the proposed uses, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The commenter's opinions 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. PC339

KAYE GAGNON

Comment PC339-1

I am very concerned about the traffic impact of the waterfront development project proposed by the City of Redondo Beach. I experienced first hand the impact of the El Segundo Plaza development during my commute. My commute time doubled to cross and travel on Pacific Cost Highway (PCH) between N Ardmore Avenue and S Hughes Way. I am requesting that **CalTrans** be brought in to do a traffic impact as the commute time on PCH and Prospect Ave. will be a significant impact for cars traveling north and south bound.

Traffic impact is my biggest concern, along with the traffic impact what is the cost of police personnel needed for safety at a theater. We know the theater's in the Galleria are not safe, why build another unsafe attraction?

Parking does not seem to be adequate for the massive development proposed.

Response to Comment PC339-1

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. For the comment letter from Caltrans on the proposed project, refer to Comment AS002. The City of Redondo Beach is the lead agency for the proposed project and cannot delegate preparation of the Draft EIR and its traffic analysis to Caltrans. Besides the analysis in Section 3.13, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Please refer to Section 3.13 and Master Response #7: Waterfront Parking regarding parking associated with the project.

Comment PC339-2

Boating is both a form of recreation and travel. Traveling boaters can bring revenue to our city and fascination for residence and visitors. The proposed plans do not afford enough space, nor draw to attract boating commerce nor recreation.

Response to Comment PC339-2

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 proposed project would not affect the existing transit moorings in King Harbor. In addition, the proposed project provides for a small craft boat launch facility and would continue to provide recreational boating within the harbor. Please also see Response to Comment PC323-73 for discussion of the proposed boat slips. 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 PC339-3

I am concerned about water quality impacted by this project. The lagoon is a unique feature of Redondo Beach, make it a safe place for swimmers.

Response to Comment PC339-3

The impacts on water quality are detailed in Section 3.8, Hydrology and Water Quality in the Draft EIR. In addition, please refer to Master Response #4: Modifications to Seaside Lagoon for information on the lagoon and water quality.

Comment PC339-4

The options for sport fishing are insufficient. I want the Sport Fishing Pier (Polly's Pier) saved as well as to see local businesses saved to preserve Redondo Beach's character.

Response to Comment PC339-4

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Comment PC339-5

Revitalize, not supersize. Please listen to the input the city and the developer are getting, I attended several of the visioning sessions and open space and views of the ocean are what people want. Let's work together with the citizens, City staff and the developer to get this right.

Response to Comment PC339-5

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. PC340**BARBARA BEST & JOHN LUBRATICH**

Comment PC340-1

John and I are residents of Seascape II, at 150 The Village. Our unit 2 town home sits about 7 feet from the curb along Pacific Avenue, just a few feet from the Pacific/Harbor intersection, and the entrance to Pier parking. Our bedroom is downstairs; we are already able to enjoy the benefits of noise and car lights at all hours, especially during the summer months.

We attended a meeting in December, at the library. I appreciate the amount of information that was provided; unfortunately there were no take-home materials, but we were advised that everything is available online. I spoke with someone there, in regard to traffic mitigation planned for Pacific Avenue, during and after construction, and was advised we are outside the scope and boundaries of the defined project. I see that there are planned mitigations for other intersections, and have a great amount of concern as to Pacific traffic not being addressed-we are heavily impacted by traffic to the pier today, so it is more than reasonable to expect that will continue, and likely worsen in the term of construction and after. Not addressing this is a significant gap in the EIR. Residents in our whole complex will be heavily impacted by construction dirt, traffic and noise, to an extent not anticipated in any way in construction of our units 30+ years ago.

Response to Comment PC340-1

As detailed in Section 3.13 and Appendix L1 of the Draft EIR, the Pacific/Harbor intersection is within the traffic study boundary, including the intersection of Pacific Avenue and Harbor Drive, which currently operates at level of service (LOS) A. In addition, as an adjacent sensitive receptor location, the residences adjacent to the project site, as well as larger geographical area as appropriate, were analyzed in the Draft EIR for the 14 environmental resource issues. 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. Please refer to Response to Comment PC020-3 for additional information.

The commenter also asserts that traffic conditions will likely worsen in the term of construction and after. 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 passenger car equivalent [PCE] vehicle trips in comparison to the 9,684 existing vehicle trips from current operations). Please see Draft EIR pages 3.13-43 through 3.13-44 for discussion of cumulative traffic growth rates.

Comment PC340-2

It has been mentioned by other residents here that speed bumps, making Pacific a one way street, or 'resident only' controls are possible mitigations to ease traffic, and some noise-I m asking that there be an inclusion of mitigation of traffic and noise associated with this project during construction and after.

Response to Comment PC340-2

As noted, in Draft EIR Section 3.13, Traffic and Transportation, the impact of the proposed project is less than significant for construction and less than significant with implementation of mitigation at seven locations within the study area for operation. No additional mitigation is necessary. Your suggestions are noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Of the four significant and unavoidable impacts that would occur during construction (short-term throughout the 2.25 to 2.5 years of construction), are 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). 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. 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.

Refer to Response to Comment PC020-3 for specific noise information associated with the area of Pacific and Harbor. The suggestion to install speed bumps would not reduce construction noise impacts, which are associated with on-site construction equipment. Please also see Response to Comment PC317-3 regarding infeasibility of speed bumps on the Pacific Avenue Reconnection or limited public streets to "residents only." With regard to making Pacific Avenue a one-way street as a means to reduce potential noise impacts, it should be noted the traffic that would otherwise use Pacific Avenue would simply be rerouted to other roadways

nearby and the associated roadway noise impacts would be relocated, and not eliminated, accordingly. As indicated in the discussion of Impact NOI-3 in Section 3.10 of the Draft EIR, the roadway noise impact associated with the Pacific Avenue Reconnection, as currently proposed including two-way traffic, would be less than significant.

Making Pacific Avenue Reconnection a one-way street would also increase vehicle miles travelled compared with the project since traffic traveling to or from the project site (depending on the direction of one-way travel on Pacific Avenue) would need to take a more circuitous route. Traffic operations on Catalina Avenue would be slightly worse if Pacific Avenue were one-way only.

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 Alternative.

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

Comment PC340-3

We are glad to see the updating of the area, and realize the value to Redondo Beach. However, most residents will be far away from the daily impacts of construction and increased traffic, and are much more excited than those of us that will be in the war zone. Addressing our concerns as to traffic and noise, that will impact both our day and evening hours, is the inclusive approach for a group of future customers that, due to proximity, you will agree will be first-line consumers and, hopefully, regular supporters of the businesses wanting to call this project home.

Thank you for your time in reviewing our concerns, and we look forward to seeing mitigating actions included in the final plan.

Response to Comment PC340-3

Please see Draft EIR Sections 3.10 and 3.13 for discussion of noise and traffic. As discussed in Section 3.10, the proposed project includes a number of construction noise mitigation measures, including (1) use of equipment mufflers, (2) stationary construction equipment placement limits, (3) equipment staging limits to avoid construction noise, (4) use of electric tools, and (5) installation of sound barriers. Your comment will be included in the Final EIR presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC341

JOHN ENG

Comment PC341-1

Attached are my comments regarding the Waterfront DEIR.

I would like to offer a few comments regarding The Waterfront Project, specifically Old Tony's and Top o' Tony's.

Even though I live 35 miles away I find myself going to King Harbor Marina 5-6 times a year, usually with friends from out of town and *always* to Old Tony's. Why? Because this restaurant is unique. I have written books on restaurants and Old Tony's is among the top ten *must see* restaurants in Los Angeles.

It is human nature to put more value on the things you *don't* have then to value the things that you *do* have. Let me tell you, as a semi- outsider, that you *have* something very special. It is rooted in history, memories and emotions and it is a gem.

It's easy to see why *new* is considered good. New codes for the safety of the public, new construction materials, new construction methods and new attracts public attention. But just like something shiny, does it last? And if these were the *only* criteria, then we wouldn't have the Parthenon in Greece, the Forbidden City in Beijing, the Eiffel Tower in Paris, the Empire State Building in New York or even Bourbon Street in New Orleans. Why do these places still attract people all over the world? Obviously it's not because they're new, but in fact, the opposite. They have history (something that resonates in all of us), they are different and they are rare.

Old Tony's is a family owned business and much credit goes to them but the building in its present location has taken a life of its own. This building has acquired its own unique integrity and personality. The rest of the pier can and perhaps should be renovated but I strongly urge you to consider the significant value of Old Tony's as it stands now.

Response to Comment PC341-1

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, similar to the Sportfishing Pier and Polly's (as described in the master response and Draft EIR), Tony's On The Pier appears eligible for designation as a Redondo Beach landmark under Criterion C (although there is no official designation) as an excellent and intact example of 1960s era fantasy themed commercial architecture. The building is also eligible for local landmark listing under Criterion B (although there is no official designation), for its association with its developer, Tony Trutanich, a successful restaurateur, businessman, and master leaseholder for the entire Monstad Pier. Tony's On The Pier is also significant for its association with important patterns of events in Redondo Beach history. Specifically, for its contribution to the popularity and success of the redeveloped pier during the era of waterfront renewal and expansion in Redondo Beach in the early to mid-1960s. The Draft EIR concludes that implementation of the proposed project would result in the demolition of the Tony's On The Pier and its companion structure, which would constitute a significant adverse impact to a potential historical resource. Per 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 the structure and the pier it sits upon. Specifically, as detailed in Section 3.5 Geology and Soils (Section 3.5.2.3 Existing Structural Conditions) of the Draft EIR, inspections of the Horseshoe Pier of which Tony's is built upon found the condition of the pier structure 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 pier and buildings (e.g., Tony's On The Pier), 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 Tony's On The Pier. 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. PC342

JONATHAN MARQUIT

Comment PC342-1

I am writing to request that sport fishing is retained as part of the new waterfront development in Redondo Beach. I grew up fishing on sport boats operating out of Redondo Beach, and the fishing operation in Redondo has been a large part of the community for generations. Access to the ocean and its resources is an integral part

of life in southern California and Redondo Beach has historically been critical in providing this access for many people in the South Bay. Please keep sport fishing in Redondo Beach!

Response to Comment PC342-1

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. PC343

MOSES RAMLER – LANAKILA OUTRIGGER CANOE CLUB

Comment PC343-1

Here are our comments of the Draft EIR

Lanakila Outrigger Canoe Club is located on Mole B, which is not mentioned when discussing leaseholders of Mole B. Since we are located on Mole B and launch directly in the main channel we have concerns about the alternative location of a boat ramp being placed on Mole A.

We support the proposed project listed under 4.3 of the Chapter 4 in the DEIR which places a boat ramp in in the south turning basin on Mole C near Seaside Lagoon. We object to the alternative plan and all options of placing the boat ramp on Mole A. The DEIR seems to exclude certain factors when considering safety and waterside traffic measures for the Mole A alternative.

As documented on 4-17 - BIO 3 - the need to mitigate surge and swell impact at Mole C would require an additional wall for mitigation of swell and surge during 20 or 100 year events, however there is no mention of additional mitigation measures for the Mole A location. As recently as 1-7-16 documented by video and distributed via youtube El Nino waves near King Harbor Yacht Club. As you can see in the video below swell and water surge can present a dangerous safety issue if proper mitigation is not accounted for.

<https://www.youtube.com/watch?v=1yYbA080dC8>

There is a need for additional mitigation analysis to be consistent with measurements for both Mole A and Mole C. However because no mitigation is included in Mole A the BIO - 3 measurement is skewed and adversely affects the original plan of placing a boat ramp on Mole C. Reflected by page 4-340 - Mole C figures represent mitigation where Mole A all options reflect no mitigation. This needs to be addressed and corrected to be fair to both locations.

As documented on 4-18 Impact TRA - 3 - it show Mole A has the least amount of traffic with a L score and the original proposal for Mole C has a M score. This may be somewhat true for landside traffic but is absolutely incorrect for waterside traffic. Mole A and Mole B have the highest amount of waterside traffic in the entire harbor. There are two glaring issues, there is not much relevant data to support water traffic numbers in the area of Mole A and Mole B and there is not account for the landside traffic access to Mole A which is narrow.

The water traffic is much more significant in this area of the harbor and has dangerous potential with increased congestion of a boat ramp. During the summer months at peak levels of waterside traffic the location of a boat ramp is much better suited in the south turning basin near Mole C versus Mole A. This is an additional safety issue which is not addressed.

Section 4.4.8.1 on Page 4.295 "Landside constraints include providing adequate vehicle access and parking, including vessel loading and off-loading and trailer turnaround. Water side constraints include adequate space for the ramp and vessel maneuvering navigational safety, and wave and surge exposure."

Mole C is the best location to meet these needs. Alternative site options for Mole A do not give adequate landside access which is not mentioned in the report and have significant wave and surge exposure for Waterside traffic. Access to Mole A is narrow and expansion of the roadway would be costly and difficult. This would increase the BIO-3 measurements if expansion was considered.

Maneuvering and navigation is also congested with youth sailing, KHYC, all boating traffic between Mole A and B as well as SUP craft from Tarzan launch and outrigger traffic off of Mole B. The main Channel is now also congested with mooring which narrow the main channel. The alternative location for Mole A has seemed to exclude these traffic and safety concerns.

As listed on table 4-84 page 4-429 under traffic Impact TRA -3 Mole A all options show best results at -3 score and Mole C measures at - 1 score. Exclusion of waterside data in the northern area of the harbor as well as exclusion of access to Mole A skew the scoring. This data should be assessed and corrected as the South turning basin has much lower water traffic and is located out of the main channel. Mole C by the DEIR quoted language from section 4.4.8.1 would be the best and safest option for landside and waterside traffic.

Although Lanakila Supports aspects of the original project design, specifically the location of the Boat ramp at Mole C, it opposes the alternative boat ramp location of Mole A for all options. This is due to oversight of safety, waterside and landside traffic issues which present themselves at this location.

Response to Comment PC343-1

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 details brought out by the commenter. As discussed therein, the purpose of the Draft EIR is to analyze impacts of the proposed project on the environment, not to analyze impacts of the existing environmental on the proposed project. Additionally, the purpose of CEQA is to analyze changes caused by the proposed project, not to analyze pre-existing environmental concerns.

The commenter incorrectly references Impact BIO-3 as documenting "the need to mitigate surge and swell impact at Mole C." Contrary to this assertion, Impact BIO-3 addresses biological resources impacts (e.g., wetlands). The commenter also incorrectly asserts that Impact TRA-3 addresses the "amount of traffic" and then asserts that the alternatives' analysis is incorrect, because, according to the commenter "Mole A and Mole B have the highest amount of waterside traffic in the entire harbor."

Impact TRA-3 addresses whether the project would "Substantially increase hazards because a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses." Boat launch facilities at Mole C, under the proposed project, were determined to be significant without mitigation because "[c]onstruction of a protective breakwater at the proposed small craft boat launch site may impact water traffic patterns and increase the potential for conflict with personal recreational watercraft (e.g., paddle boards, kayaks, peddle boats and other hand launch craft) emanating from Seaside Lagoon." (Draft EIR page 3.13-82.) A boat launch facility at Mole A would have a similar amount of interaction with small hand launched watercraft; however, as it is located near the end of the main navigation channel where traffic volume is generally lower. (Draft EIR page 4-415.) With the proposed breakwall at the Mole C boat launch and the opening of the lagoon, the boaters and hand launch activity would be initially facing toward each other. With a hand launch and ramp at Mole A or

hand launching originating from Basin 1, the boat and hand launch activity would be further and parallel to each other. As also outlined in Draft EIR Table 3.13-8, the harbor has operated safely with a much greater levels of boat traffic. (See also Section 3.13.2.4.3 for discussion of the harbor's channel capacity.) 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. PC344**GIGI FRAMPTON - FOSS**

Comment PC344-1

Here is my comments and concerns for the proposed development for the Redondo Beach Waterfront project.

Will there still be a hoist and forklift for commercial operations that are currently operating in Basin 3? These are essential to our operation as we support the Tankers and Chevron operations at the El Segundo Marine Terminal.

Will there be any type of storage for businesses?

Bridge – We are a 24/7 operation that must be able to fulfill our support role to Chevron and the El Segundo Marine Terminal. We cannot be hindered by a mechanical bridge that at some point will fail. Is there a backup plan for when it fails? Power outage?

Proposed slips – In front of South Bay Sailing. Not the best place to put slips due to the surge and the amount of assorted vessel traffic in the harbor.

Sport fishing Pier – This is vital to the sport fishing operation and to the history of Redondo Beach. People have been coming to Redondo to go fishing and enjoy the “destination” for approximately 100 years.

While I have been in the marine industry since the 60's the current state of the Redondo Beach pier, International Boardwalk is depressing. I do remember Santa Monica pier, POP and Redondo were a place to go fishing, surfing, take in some rides and enjoy family life, etc.

Would like to see the overall footprint be smaller than is currently proposed. While I realize there will be shopping, dining and some activities of various types, would like to see a good mix of maritime and family activities.

Response to Comment PC344-1

Please refer to Master Response #8: Boat Ramp in King Harbor regarding the new small craft boat launch facility. As for future storage for businesses, the appropriate amount would be provided associated with the use. Regarding the pedestrian bridge, see Response to Comment PC323-96. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing regarding sport fishing under the proposed project. Chapter 4, Analysis of Alternatives of the Draft EIR includes an analysis of a reduced project alternative (Alternative 7). As noted on Draft EIR page 2-43, the private boat hoist facilities would be removed as part of the proposed project. 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. 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. PC345**JULIE COLL - WATERFRONT EDUCATION
DBA KING HARBOR BOATING
FOUNDATION****Comment PC345-1**

Attached are my comments. Can you please let me know that you received this and have no issues with the attached file

Waterfront Education

Comments from Julie Coll, founder and Executive Director of King Harbor Boating Foundation dba Waterfront Education. In response to the recent DEIR for the CenterCal project and King Harbor I have the following thoughts and concerns.

Mole A. I am a sailboat owner and avid racer. My boat is in dry storage and goes in and out of the water 2-3 times a week on Mole A from April through September. In the other months it averages about once a week. I am very familiar with the tides, surges, storm issues and water traffic patterns in this area. Placing a boat ramp on this mole is a bad idea for many reasons.

1.Safety. We get many storms that generate huge waves that crash over the break wall. Even medium storms generate life threatening situations with people climbing on the break wall. As the ocean gets warmer the water is expanding and raising the levels. Huge waves over the break wall will increase with rising ocean levels and greater tides. USC has a Citizen Science Initiative studying this very topic. More information can be found at the following: <http://dornsife.usc.edu/uscseagrant/urban-tides-initiative/>

2.Water side traffic. In the DEIR it states “Location of a launch ramp on Mole A is considered to not have significant impact on existing harbor traffic since the site is located near the end of the main navigation channel where traffic volume is lowest”. This is actually a false statement written by individuals unfamiliar with our local water traffic. The north part of the channel is actually the busiest part of the harbor. It is also narrow with a blind corner out of basin 1 into the main channel. The King Harbor Youth Foundation and the Sea Scouts run programs in this part of the channel. In addition, King Harbor Yacht Club and Redondo Beach Yacht Club have boaters that race on Tuesday and Thursday nights and most week-ends that utilize the north part of the channel from early spring until late fall. Also Tarsan paddle boarders enter the main channel in this north area. This does not even take into account the many visiting yachts that are guests to the harbor and stay on the docks located in this area.

3.Land side traffic. I am in the harbor almost every day. I enter from 190th/Herondo. There are frequent back-ups to PCH since the road way was reduced from two lanes down to the current one with parking. The left turn on to Harbor Drive is better. The turn from Harbor drive to Yacht club way is a night mare. It is the only traffic light along Harbor Drive where the bikers and the cars are both green at the same time. In addition cars are not allowed to turn right on red. The back-ups are terrible and frequent. The bikes tend to ignore the signals anyway. This is a tight difficult turn for cars let alone a truck and a trailer. There are several tight turns as you navigate through to Mole A including the “S” turn. There is barely room for two cars along the road and at times after a big storm there is only room for one with the sand that covers the road. I don’t see how it is possible to widen the road in this area to accommodate a queuing lane for a boat ramp. You have marina slips on one side and the break wall on the other.

The Sport Fishing Pier needs to be a part of the redevelopment plan. Our most popular class Fishing and Gross Morphology takes place several times a week on this pier. We throw birthday parties here as well. For the kids fishing is often their first interaction with the ocean. The rocks provide food for the fish unlike the larger pier. In addition, with our harbor being a shallow one there is a need for a dock to bring in the

larger vessels such as whale watching boats and tall ships. The last time our organization brought in a tall ship over 700 people attended from as far away as Westlake Village, Santa Clarita and San Bernardino. These larger vessels are the way that non swimmers interact with the ocean. Having a dock that can accommodate a variety of large visiting vessels is an important way to draw interest to the waterfront on an ongoing basis. A new Sport Fishing Pier could be a clean, safe and integral part of the overall project.

The DEIR sections that talk about soft vs. hard harbor bottoms are in general true but not in our harbor. Our Marine Exploration class takes place out on the water several times a week and studies the many creatures and plant life in our harbor. We have some small invertebrates like sea urchins and sea slugs. Very occasionally we will see a sea star or octopus. We don't have eelgrass in our harbor, we have kelp.

In conclusion, I am in support of the CenterCal project in general provided that public access to the ocean is not reduced and is incorporated. The south turning basin is a great location for a boat ramp with its quick access to the ocean. It is very wide in this area. In Marina del Rey where there is a super long channel out to the ocean I have seen many unsafe boating practices as various water craft attempt to share the water. The sooner we can get visiting boaters out to the ocean the safer it will be.

We have an opportunity for an "education destination" and to create a unique experience for visitors similar to other locations such as Dana Point. I think it is critical that those that experience the ocean from land and those that experience it on the water come together as one community. Past projects where boaters have not been integral in the planning process have resulted in poor results and wasted tax dollars...for example the mooring balls which sit unused and not maintained.

I think it is critical to include public storage and access for stand up paddle boards, kayaks and small sailing and boating craft. We need dock space for this beyond a mother's beach. These vessels are a key gate way for initial ocean access and creating a harbor habit. The price point for these types of vessels is lower and usually leads to purchasing of larger boats. Healthy marinas with active boaters are good for the city's economy since a portion of all monies collected for these services go to the city.

I am not opposed to a mother's beach if it is designed so that the sea lions cannot access it. The sea lion problem in our harbor is not going away. Although some people consider these animals cute, they are wild, territorial and can be very aggressive. The damage they cause to docks and boats can be seen throughout the harbor.

As a resident of Redono Beach I am excited to see the city and CenterCal create a revitalized waterfront for us all to enjoy.

Response to Comment PC345-1

Regarding Mole A, safety, waterside and landside traffic comments, please refer to Master Response #8: Boat Ramp in King Harbor.

Regarding the Sportfishing Pier, please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. The commenter alleges the Draft EIR's discussion of soft vs. hard harbor bottoms in the harbor is incorrect. As detailed in Section 3.3, Biological Resources, an interferometric sidescan sonar survey was conducted at the project area in April 2014 and March 2015 to map the existing benthic marine habitat types (for details on the survey methodology, see Appendix D1); therefore, the Draft EIR's discussion is specific to the harbor. Section 3.3 also details the habitat and animal and plant life (on land and in the water) found in the harbor. Please also see Response to Comment PC343-1 for discussion of boat traffic near Mole A.

The commenter also asserts that existing traffic conditions "are a night mare." Individuals' perceptions of traffic can be subjective; however, the Draft EIR traffic analysis is based upon objective traffic counts taken in 2013 and 2014, as discussed in Section 3.13.2.3.1 of the Draft EIR. As further noted on Draft EIR page 4-414,

“the differences in traffic impacts compared to those of the proposed project would be negligible” for the Mole A boat launch location.

Regarding the proposed Seaside Lagoon improvements and sea lions, please refer to Master Response #4: Modifications to the Seaside Lagoon.

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. PC346**REBECCA ELDER**

Comment PC346-1

I wanted to take a moment to strongly voice my support for the proposed redevelopment of our waterfront. The current state of our harbor area is shameful and dangerous, nothing short of a major redevelopment will fix that. It's time to move forward as a city and CenterCal's vision is better than any alternative I've heard of. As a lifelong South Bay resident, I look forward to Redondo Beach taking the next step to develop as Manhattan and Hermosa Beaches already have. I look forward to a pier and boardwalk that residents will use, instead of the outdated and dilapidated structure we have now.

I would be interested in an alternative boat ramp location, though as the primary site next to Seaside Lagoon would create significant safety hazards and increase pollution at an already heavily used beach. I also have concerns about the significant traffic issues as Portofino Way is only one lane in each direction, the backup for water crafts waiting to launch would cripple at area. I believe powered watercraft should be kept as far away as possible from unpowered recreational water users.

Response to Comment PC346-1

Please refer to Chapter 4, Analysis of Alternatives, Alternative 8, of the Draft EIR and Master Response #8: Boat Ramp in King Harbor for additional information regarding alternative boat ramp locations, safety, waterside and landside traffic. As for Portofino Way, depending on the number of ramps should Mole C be chosen as the ramp facility, there would be approximately 20 or 40 vehicles at off traffic hours; hence a traffic impact is not expected. Furthermore, there are parking spaces provided adjacent to the proposed Mole C boat launch facility where individuals could park their vehicles while waiting to utilize the boat launch. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

COMMENT LETTER NO. PC347**SALLY HAYATI**

Comment PC347-1

The unique South Bay quality of life is threatened by overdevelopment, much of it in Redondo. The Centercal Waterfront Project is especially wrong for our area. This will mean the total destruction, forever, of a large portion of our beautiful water front. Structures will block 80% of views along southern Harbor Drive, some up to 45’ tall. Already the Shade Hotel has blocked out the sailboat masts that I loved to gaze at as we ride along the bike path. There are predicted to be 12,550 additional car trips per day. This is obscene. Those of us who live in these communities don’t want more and more shoppers and tourists pouring in. We LIVE here.

Parking has always been better in RB than in MHB, but now we will have 140% more development, with only 8% more parking. There will be less access for boaters, kayakers, swimmers, SUP'ers.

My children played and had parties had Seaside Lagoon. Now a Seaside Lagoon 1/3 the current size and open to the dirty harbor water is threatening to create even more health hazards.

Give up this primitive American boosterism. It's not the early 20th century anymore. We know that development doesn't automatically make for a better world.

Response to Comment PC347-1

Please refer to Master Response #9: Views and Scale of Development regarding views, Master Response #7: Waterfront Parking regarding on-site parking; Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for information on traffic, and Master Response #4: Modifications to Seaside Lagoon regarding the improvements to the lagoon.

COMMENT LETTER NO. PC348

MARCIA PINE

Comment PC348-1

For years I have been going to Polly's on the Pier, to eat, watch people fish, to enjoy just sitting in the sunshine, and in general, just to hang out at a place that rarely exists anymore. On a monthly basis I would go there with my group of lady friends. We would have breakfast or lunch and sit and talk and talk...and nobody would care if we took our sweet time. At Christmas we would go there and exchange gifts...and we always took some little presents for our dear waitress, Cindy. Terry Turk would often come by and say hello to us 'Lung Ladies' as we would call ourselves. We would have our support group meetings there and it was such a special place to help ourselves feel well. Our little group has kind of disbanded but the memories of all the times we went there are still with us.

I loved to take my grandson, Griffinn, to the pier to 'catch seagulls'. He will never forget fishing on the pier. Every one would be so helpful. We could rent a fishing rod and get some bait...and just enjoy the feeling that you will never forget. The pier and Polly's on the Pier go together like a PB&J.

I'm writing to express my hope that Polly's on the Pier will always have a place on the pier...and I certainly hope that there will always be a Pier.

Response to Comment PC348-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. Thank you for your comment. 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. PC349

**MARYANN GUTHRIE – KING HARBOR
MARINA**

Comment PC349-1

Please see attached comments from Maryann Guthrie regarding the Waterfront Revitalization Project.

Marina Cove Ltd. (MCL), as the Master Lessee, has owned and operated the King Harbor Marina leasehold located within the City of Redondo Beach for the past 45 plus years. Our leasehold consists of approximately 36 acres; twelve (12) acres of land and twenty-four (24) acres of water. It has come to our attention that a portion of our leasehold identified as "Mole A" is being considered as an alternative site for a Small Craft Boat Launch Ramp Facility as part of "The Waterfront Draft Environmental Impact Report" (WDEIR) process.

MCL concurs with the WDEIR determination based on its ranking system that the Mole A Options are the most environmentally superior alternatives for a Small Craft Boat Launch Ramp. The Mole A location studied has been and will continue to be subject to significant ocean swell action topping over the breakwater. It occurs mostly during the winter storm season, causing public safety issues and private property damage which includes the existing yacht club and parking facilities. During these heavy surf events, access to Mole A is usually closed off, even to yacht club members. This includes the launching of boats, especially while small craft warnings have been issued so a ramp at this location would also be closed.

Additionally, we believe the Mole A site and access roadway would provide adequate queuing space for vehicles with trailers waiting to be launched so as not to block the public streets providing access to other facilities. However, if the yacht club remains on Mole A the roadway would need to be modified to allow for continual access to its facilities.

Since Mole A was selected as one of the alternative sites for a Small Craft Boat Launch Ramp, we have worked diligently with a marine engineering firm, the King Harbor Yacht Club (KHYC) and the City of Redondo Beach to consider the feasibility of such a facility along with various complimentary amenities on our lease hold. A conceptual plan representing this effort has been shared with both the City and the KHYC for their consideration.

KHYC is an existing sublessee of MCL which currently occupies the majority of Mole A and operates various programs promoting boating for its members and the public. We have been informed by KHYC that after serious consideration it has determined that a Small Craft Boat Launch Ramp on Mole A would be incompatible with its ongoing operations. Consequently, we studied and concluded that the KHYC facilities (excluding its dry boat storage) could be relocated to Mole B in the event the City of Redondo Beach and California Coastal Commission ultimately determine that the most suitable and beneficial long term solution for locating a new Small Craft Boat Launch Ramp in King Harbor is on Mole A. In this regard, we have formally proposed relocating KHYC to Mole Bin order to better accommodate the placement of a Small Craft Boat Launch Ramp on Mole A.

At the present time, MCL is in discussions with the City of Redondo Beach and KHYC to accomplish this transaction.

Response to Comment PC349-1

Please refer to the Master Response #8: Boat Ramp in King Harbor for information on the alternative boat ramp locations. As discussed on Draft EIR page 4-301, under the Mole A alternative "The 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).) The City believes that it is possible to physically provide both facilities at Mole A; however, it is possible that other iterations of this alternative would better meet the needs of existing tenants. Any subsequent modifications to the proposed project or the alternatives will be subsequently considered in light of the factors under CEQA Guidelines

Section 15088.5. 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. PC350**JOANN TURK**

Comment PC350-1

Thank you and the City of Redondo Beach for conducting these studies and opening them to the public for comment and discussion. I have worked and volunteered and been involved in the Harbor for 40 years and improvements such as these that are being discussed by the City and CenterCal and Harbor and Pier businesses and the public have been a long time coming and are much needed. I have seen many potential developers come and go in Redondo Beach, but I have never seen a developer of this quality, means and experience get this far. Part of the credit goes to the good officials and management at the City who now have the will to plow forward because they know it's time to do something and they know the infrastructure needs help.

I realize that there are still many moving parts to figuring out this whole puzzle, which I trust will be figured out by some very smart people, so I will limit my comments in this memo to the ones that seem the most important to the waterfront in my eyes.

First of all, I think it is very important that the beloved family- oriented, legacy businesses be saved. The ones I think of off the top of my head are Captain Kidd's and Quality Seafood, Redondo Sport Fishing, Voyager Whalewatching and Boat Rides, Ruby's and Polly's. And the Looking Glass bottom boat and pedal boats. Kayaks and bike rentals.

It is also very important for the future of the harbor that you fix or replace the sportfishing pier. This is a historical icon, an environmentally important piece of the harbor, and represents much needed open space, and it is the soul of the waterfront for many people. It is not enough that the fishing and boating and Polly's get relocated to other areas of the new development.

They need to be on that pier.

To remove the sportfishing pier would have a huge negative impact on the environment of Redondo Beach. It is the home to many birds, kids learning to fish, deepsea sportfishing, diners, whalewatchers, bird watchers, and people of all ages seeking a connection with nature. The reason Polly's has been so popular is because it blends into the background and let's nature be the entertainment. There are some pet pelicans that hang out there, a couple of Great Blue Herons, some night herons, seagulls, and many Garibaldi, the state fish, under the pier. There is currently a program one of our local volunteers is conducting that teaches kids about the environment and to fish. The Cetacean

Society in conjunction with Voyager Whalewatching wants to conduct occasional Saturday morning classes on marine mammals and particularly the whale migrations for kids to learn about the ocean and its inhabitants.

The little pier represents access to the water for such a diverse audience. In comparison, for example, the boat ramp that is required to be built by the California Coastal Commission (for several million dollars) will serve around 40 customers/boaters a day.

If two or more go out boating, it might be 100 a day.

The sportfishing pier currently serves around 800 to 1000 people a day, on the warm weather days, between the sportfishing, whalewatch, Polly's on the Pier, kids fishing, strollers, and sightseers. It is a favorite for not only the locals who come down on a regular basis, some of them two or three times a week, for 30 or 40 years, but also is a favorite of visitors. They say there is no other place like it in California. I have served on the Visitors Bureau for 20 years, and the current trend is for visitors looking for an "experience." Our visitors say there is no better experience than coming to the sportfishing pier and eating in the outdoors at Polly's. I am meeting a travel writer from Florida Thursday morning for breakfast on the "little" pier. The visitors to Redondo Beach represent a good chunk of money to Redondo Beach through the TOT taxes funded by the hotels. There has to be some "there" there to make this an interesting place for their guests want to come and come back another time.

It would be crazy to remove the sportfishing pier because it represents waterfront square footage. The cost of replacing it is minimal in comparison to the 7,000 square feet located right OVER the water. Buyers currently are paying \$15,000,000 for a Strand lot in Manhattan and Hermosa Beach. That is to give pleasure to one family! Compare that to the hundreds of people who enjoy the sportfishing pier!

Simply moving the businesses that exist on the little pier to the waterfront development does not replace the square footage. I have never heard of any municipality or individual REMOVING waterfront square footage. In Dubai, Holland, San Blas Islands, the South China Seas, and many other countries, they are adding soil and making islands to increase square footage. Let's not lose the 7,000 square feet we now have. It is an irreplaceable treasure.

If the sportfishing pier were removed (and it would cost a good sum to remove it too), it will never be rebuilt because of the myriad laws and regulations and the red tape that would be required to build something new.

The pier is also a safety backup for boats coming back to Basin 3 and other parts of the harbor. If some docks were wiped out due to a storm or the new bridge malfunctioned, passengers could be unloaded at the sportfishing pier.

So the key words are Nature -- Waterfront Square Footage -- Access to the water -- Bird and Wildlife habitat -- Families -- Outdoor dining -- Visitors and happy locals. Please save the sportfishing pier!

Response to Comment PC350-1

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. PC351

ERIK N BOWMAN

Comment PC351-1

I strongly support the efforts to revitalize the Redondo Beach Waterfront. I've been a residential property owner in Redondo Beach since 1998 having first visited with my family in 1976 to visit my great Aunt and Uncle who lived in the alphabet streets. In fact, my first house in Redondo was located on Catalina Avenue just one block from Veterans park within walking distance to the Pier and waterfront, so I personally understand many of the issues.

I have reviewed the DEIR, attended two of the public sessions and have read a lot social media discussions both for and against. Based upon this each of the objections that have been raised can be addressed in a number of ways based upon information reported in the DEIR that should not prevent this project from moving forward.

The only significant issue that I see is a lack of a definitive agreement from CenterCal to reserve a certain amount of space for locally owned, independent businesses represented in the project. CenterCal has consistently indicated that the vision includes local businesses, and they've promised to work with existing local Pier-area businesses but that doesn't seem to go far enough. There are many Redondo Beach businesses with one or more locations throughout the South Bay that should be encouraged and even incentivized to open an additional location in the new development.

Response to Comment PC351-1

As for businesses at the proposed project, refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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. PC352

ANTOINETTE FOWLER PERPALL

Comment PC352-1

I have attended a number of meetings regarding the proposed Redondo Beach Harbor redevelopment by CenterCal.

I have studied the materials provided and asked questions of the developers and representatives of the City of Redondo Beach. I have not received adequate answers to my questions.

My main concern is safe accessibility to the water for boating, and other water sports.

Mole A has been proposed as a location for a public launch ramp, the analysis leaves many unanswered questions regarding safety.

A vehicle pulling a boat can be over 50 feet in length. In order to get to the proposed launch ramp one would have to maneuver a turn onto Harbor drive (which is now two narrow lanes and a double bike lane with curbs separating the bike lanes from parking lanes); then turn across the two bike lanes onto YC Way; then turn a sharp left followed by a sharp right; then maneuver a bend in the narrow road and finally proceed over the speed bumps along the narrow road adjacent to the breakwater wall.

Has anyone considered what a hazard this is?

What will happen along the narrow road when one trailered boat is going to the ramp and another is coming from the ramp?

Has anyone analyzed how much actual space it takes to turn and position a trailered boat for launching? Or, has an arbitrary number been provided by Staff?

Will there be adequate depth for trailered sailboats with keels to launch at low tide?

Redondo Beach is located near premier fishing and diving locations off Palos Verdes. Who performed the feasibility study regarding how many boats are expected to launch? Or, is there only an 'estimate' provided by Staff?

How many vehicles with trailers can actually park and still provide adequate space for others to launch and recover their boats? Was a feasibility study performed? Or was this 'estimated' by Staff?

Currently the North end of the harbor is a safe haven for kayakers, paddle boards, outriggers and children learning to sail in dinghies. What will happen when a just launched boat powers through these small vulnerable vessels? Will a Safety Officer be on site?

The rocky Breakwater jetty provides welcoming habitat for sea life. The required dredging and the replacement of the natural sea bottom with a concrete ramp will disrupt the ecology of the area. Who performed the study regarding effects of a concrete ramp on sea life?

The proposed ramp is directly adjacent to the main Breakwater. Even in calm conditions waves frequently break over the wall. During storms the area of the proposed ramp and parking lot has been awash and strewn with rocks.

In very stormy conditions cars have been swept across the parking area (photos are available) and access to the entire Mole A area has been closed. Who is liable for damage to vehicles parked in the lot?

I have been a boat owner and a boater for over 50 years. I respect the power of water. If public access on Mole A is made more attractive by including a park and restrooms, how many more persons will be swept off the Breakwater?

This Waterfront project is too large in scope and too disruptive to the current residents and leaseholders in the entire Harbor. I lived in Redondo Beach during the prior "harbor redevelopment". I sadly watched it fall into disrepair due to poor management, inadequate security and lack of proper maintenance. What has been done to assure me that this won't happen again?

Most importantly, our Harbor is intended to be a Harbor of Refuge for BOATS. It also provides accessibility for citizens to enjoy nature and all sorts of water sports. To provide space for a Mall by the Sea, movie theater, and another hotel, is not why our Harbor was built.

I respectfully await your answers.

Response to Comment PC352-1

Please refer to the Master Response #8: Boat Ramp in King Harbor for information on the alternative boat ramp locations and parking. Impact TRA-3 in Draft EIR Section 3.13 addresses whether the project would "Substantially increase hazards because a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses." The commenter also asks whether a safety officer will be on-site. The Redondo Beach Harbor Patrol is currently located at Mole B and enforces the City's rules and regulations in the Harbor. (See Draft EIR Section 3.13.2.4.2.) As also outlined in Draft EIR Table 3.13-8, the Harbor has operated safely with a much greater levels of boat traffic. (See also Section 3.13.2.4.3 for discussion of the Harbor's channel capacity.) The commenter also asks questions about the biological resource analysis. Please see Draft EIR Section 3.3.1 and Appendix D1 for discussion of the Biological Resource Assessment prepared by Merkel & Associates. The commenter is correct that during very stormy conditions the Mole A area has been closed.

However, the City has no record of cars having been swept across the parking area and no photos were provided. As with most parking facilities, unless vehicle damage was caused by another individual, the vehicle owner is responsible for any damage to their vehicles when parked in the lot. As for the projects ability to attract businesses, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Please also see Draft EIR Chapter 5 for discussion of Urban Decay. 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. PC353**MARK E KINNI**

Comment PC353-1

I am VERY concerned about already ridiculous traffic, and the impact this potential development would have.

Additionally, I strongly feel the Sport Fishing Pier be saved, and some vanishing semblance of the character of Redondo Beach be preserved.

Response to Comment PC353-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing and Master Response #6: Summary of Traffic Impacts Associated with the Operation of 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. PC354**JOANNE NEWMAN**

Comment PC354-1

I'm very curious.....was the enormous amount of traffic and pollution which supposedly will be generated by the oversized movie theater planned for the Waterfront Project (a stupid 700 seats) taken into account in the traffic analysis? Since NO analysis was done for the weekend traffic which would be the days / time the movie theater would supposedly be the most heavily attended.....how can the DEIR say there will be no impact on traffic & noise when there is no true analysis?

Was it ignored because most of us know the theater is doomed to failure?

FACT.....News report by Sam Rubin on KTLA on 10-6-14 regarding a survey of movie theaters done by Carmike Cinema found that "Movie theaters have the largest amount of excess capacity of any industry we could find in the FREE WORLD".

FACT.....CBS News Sunday Morning with Charles Osgood 2-22-2015 weekly "Pulse" segment question was "Where Do You Watch Movies?" The answers.....84% at home but only 4% AT A THEATER!! That's right.....only 4%!!!! So since it appears that anyone with an "IQ OVER 10" to steal a quote from Mr. Brunning can see that the theater will likely be the first of the Project's businesses to fail.....was the increased traffic & pollution to be caused by it on weekends (at least until the newness of the Project wears off and everyone stops coming) used as one of the reasons for ignoring an analysis of the traffic on weekends?

To me there is no acceptable reason for not doing a weekend traffic analysis as it makes the DEIR declaration of no traffic impact void. Please reconsider and make sure a true, proper and complete traffic analysis is done which includes the weekends.

Response to Comment PC354-1

As shown on Table 3.13-11: Project Trip Generation Estimates in Section 3.13, Traffic and Transportation of the Draft EIR (page 3.13-42), the 700 seat movie theater was assumed in the Draft EIR traffic analysis. As for weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Just to clarify, the Draft EIR did not say that proposed project would have no traffic and noise impact, but less than significant or less than significant with mitigation 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. 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. The opinions and 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. PC355

GEORGE IKEDA

Comment PC355-1

My comments to The Waterfront Draft Environmental Impact Report follow.

1. The last column heading of Table ES-1, page ES-10, is confusing. I would think that Change

In Baseline Footage would be more appropriate since you are showing the change from the CEQA baseline.

Response to Comment PC355-1

Comment noted. The title "Net New Square Footage (Overall increase in square footage as compared to existing development)" is consistent with CEQA. Additional explanation for this table is provided on Draft EIR page ES-9. No revision is necessary.

Comment PC355-2

2. The fourth paragraph, second sentence on page ES-18 does not make sense. It states, "Heavy Loads would be prohibited from using 190th/Anita/Herondo Street between Pacific Coast Highway (PCH) and Beryl Street and would need to use Artesia Boulevard to PCH or Hawthorne Boulevard to Torrance Boulevard.
3. It is clear from Figure ES-4, that Pacific Coast Highway intersects both Amita/Herondo Street and Beryl. Thus, 190th/Anita/Herondo street cannot be between PCH and Beryl. 190th/Anita Street is located between Hawthorne Boulevard and PCH. Furthermore, Herondo is an alternate route to the construction site from PCH (see Figure ES-4).

It is apparent that this has been copied from Chapter 2, page 2-81.

Response to Comment PC355-2

The text should say, "Heavy Loads would be prohibited from using 190th/Anita/Herondo Street between Pacific Coast Highway (PCH) and ~~Beryl Street~~Anza Avenue and would need to use Artesia Boulevard to PCH or Hawthorne Boulevard to Torrance Boulevard. These pages have been corrected in the Final EIR (refer to Chapter 3, Modifications to the Draft EIR within this Final EIR). This revision does not substantively change the Draft EIR traffic analysis of significance conclusions.

Comment PC355-3

4. Option 2 (Table 2-2, page 2-43 and page 2-57) of not replacing the Sportfishing pier is not appropriate. The fishing activity is not only for Redondo Beach, but also for the benefit of all citizens of California. Why are you contemplating reducing the seaside fishing activity, you should be enhancing the seaside related sport activity?

Response to Comment PC355-3

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing.

Comment PC355-4

The neglect of the Tidelands Trustee, City of Redondo Beach, is responsible for the deterioration of the Sportfishing pier. Thus, the replacement/repair of pier should be borne by Redondo Beach and not cost shared with the Tidelands Trust.

Response to Comment PC355-4

The cost would be part of the proposed development.

Comment PC355-5

5. The Plaza Parking Facility was built on Parcel 1 of the Harbor Center Project by the Tidelands to satisfy the needs of King Harbor visitors. The proposed project (ES Table ES-4, Page ES-14; Table 2-2, page 2-44 and page 2-61) would be eliminating approximately ten percent of the Plaza parking due to elimination of underground parking below the proposed project. In addition, the elevator is to be relocated and the stairs from Czuleger Plaza is to be reconfigured. It appears to me that the changes to the Plaza Parking facility are to benefit the commercial enterprise and thus, the city/developer should bear the cost. The Tidelands should not fund the modifications proposed.

Response to Comment PC355-5

Comment noted. The commenter does not raise an environmental issue; therefore, no further response is required. The commenter's opinion will be included in the Final EIR and provided to decision-makers for their consideration.

Comment PC355-6

The reduction of 67 double stall trailer parking to 20 stalls does not follow the notion of recreational revitalization cited in Chapter 2. This further reduces the recreational activities at King Harbor. Yes, the small

boat activity has seen reduction at King Harbor in recent years, but I would attribute it to inefficiency at the marina. I would imagine that the boaters have migrated to a more reliable marina.

Response to Comment PC355-6

Please also refer to Master Response #8: Boat Ramp in King Harbor and Master Response #7: Waterfront Parking for information on parking associated with existing conditions and the proposed boat ramp. Please also see Response to Comment PC323-82 for discussion of recreation.

Comment PC355-7

6. Alternate 4 should be PROPERTY EXCHANGED WITH STATE LAND COMMISSION. In other words, the basic project must be without the notion of basin 3 being exchanged for the Tidelands property along Mole D.

The reason is that Parcel 2 (see Figure 3.1-1b) of the Harbor Center project was mandated by the State Land Commission to be exchanged with an Upland property around 2009. The negligence by the city (Planning Department) permitted construction that does not comply with the Public Trust Document. Yes, Parcel 2 is the property of Tidelands. Please correct if I am wrong because I believe that this exchange has yet to occur and yet, Redondo Beach wants to make an exchange that is beneficial to the city. I believe that commitment made by the city in 2009 must take precedent to the Waterfront Revitalization. The State Land Commission must hold the city to the 2009 commitment.

Response to Comment PC355-7

The commenter's opinion on the title of Alternative 4 is noted. Draft EIR Figure 3.1-1b is unrelated to the proposed land exchange (it is related to the Aesthetics analysis); the proposed land exchange is shown in Draft EIR Figure 3.9-2. Contrary to the assertions in the comment, the proposed land uses were determined to be consistent with the City's tidelands grant. As also discussed on Draft EIR page 3.9-29

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.

The commenter's reference to a "Parcel 2" is unclear. The commenter's reference to a 2009 commitment appears to be referencing another site associated with Gold's Gym. Your comment is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC355-8

7. In Section 3.0.3.21.1 (Adapted Growth Projection Approach), a two percent decline in the vehicular traffic was projected by 2035, which I question. Since 2008 was the base year, when did the peak occur; i.e., before or after 2008?

Ever since I moved to Redondo Beach in November 1974, the vehicular traffic has been increasing to today. The accuracy of the model's/(s') prediction(s) must be based on past performance, which was not presented. Could you provide the information that substantiates the accuracy of the model(s) used to predict the decline?

Response to Comment PC355-8

As noted on Draft EIR page 3.13-43, “The annual growth rates applied to the existing traffic volumes were obtained from SCAG’s population growth forecast for the City of Redondo Beach, an average growth rate of 0.36 percent per year¹⁰. Population growth rates were conservatively used rather than traffic growth rates to estimate future [traffic] conditions through the year 2019 because SCAG forecasts a slight decline in average City-wide traffic volumes.” Footnote 10 from Section 3.13 provides detailed information: “SCAG integrated forecast available online at: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf. SCAG 2012 RTP available online at: <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>”

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.⁷¹ The commenter also incorrectly asserts that since 1974 “vehicular traffic has been increasing to today.” Contrary to these assertions, traffic has decreased in parts of the City, for example in 2007, the intersection of Pacific Coast Highway and Torrance Boulevard had a volume/capacity (V/C) ratio of 0.893 and 0.907 in the AM and PM peak hour, respectively.⁷² In 2014, that intersection had a V/C ratio of 0.818 and 0.848 in the AM and PM peak hour, indicating that operating conditions have improved over the seven-year period. 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 PC355-9

8. On page 3.1-6, paragraph three, I would think that the motor vehicle occupants other than the driver are more interested in the scenery than the looking at the roadway.

Response to Comment PC355-9

The commenter’s opinion is 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. Please also see Response to Comment PC246-2 for further details.

Comment PC355-10

9. Figure 3.11b captions that are incorrect are identified below.

The photograph of Pacific Avenue should be Seascape Two Condominiums. Yes, it has The Village address but the complex is Seascape Two.

⁷¹ 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

⁷² Redondo Beach Recreation Element, November 2009, Table 3 page 19.

Photograph of the Turtle Park shows Ocean Club (formerly The Village Apartments). One could barely see Seascape 3 Condominiums in the distant background.

The deck of the Pier Parking structure shows the Village Condominiums. The paint color is different from that of Ocean Club mention above.

Response to Comment PC355-10

There is no Figure 3.11b in the Draft EIR; however, the commenter could be referring to Figure 3.1-1b in Section 3.1. Understanding that there are several phases of development and names associated with the adjacent residential, as noted in Section 1.2.1 in Chapter 1, Introduction of the Draft EIR, the high-density residential development is commonly referred to as “The Village” or “Seascape.”

Comment PC355-11

10. On page 3.1-9, "The Village/Seascape Apartments and Condominiums" is incorrect. It should be titled The Village/Seascape Condominiums and Ocean Club Apartment Homes since The Village and Seascape 1 - 3 do not have apartments. Likewise, this change should be incorporated in the Czuleger Section.

Response to Comment PC355-11

Refer to Response to Comment PC255-10 above. Comment is noted and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC355-12

11. Page 3.1-24, Czulegar Park: the phrase The Village/Seascape Apartments and Condominiums is incorrect. There is The Village and Seascape Condominiums, and Ocean Club Apartment Homes. The Village Apartments was renamed to Ocean Club. Thus, all statements "The Village/Seascape Apartments and Condominiums" should be changed.

In the last two paragraphs on this page, it is a misnomer to include the apartments since views one through three show only the condominiums.

Response to Comment PC355-12

Refer to Response to Comment PC255-10 above. Comment is noted and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC355-13

12. Page 3.1-27, Key Observation 3: Only the Seascape Development (Seascape One on the left and Seascape Two on the right) is viewed in observation 3.

Response to Comment PC355-13

Refer to Response to Comment PC255-10 above. Comment is noted and will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC355-14

13. Section 3.1.3.1, page 3.1-31: What does the California Coastal Act say about reduction of coastal related recreational activities such as the removal of the Sportfishing Pier without replacing it and reduction in the number of boat trailer parking from 67 to 20 units?

Response to Comment PC355-14

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.

Comment PC355-15

The California Coastal Commission does not have the authority to approve major energy facility (power plant) greater than 50 MW. It is under the jurisdiction of the California Energy Commission. An example of this phenomenon is the Redondo Beach Energy Project.

Response to Comment PC355-15

This is not related to the proposed project or the Draft EIR.

Comment PC355-16

14. Section 3.1.3.2, Page 3.1-32: It appears that the clause to maintain coastal related uses as a recreational resource is being violated by the Waterfront Project. For example, see item 12 and the reduction of Seaside Lagoon. It is apparent that the construction of Main Street that parallels Harbor drive and the shops west on main street reduce the footage of Seaside Lagoon.

Response to Comment PC355-16

The P-PRO zone that includes the Seaside Lagoon under the proposed project will remain the same acreage as it is today. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for details. Please see Section 3.9 of the Draft EIR for discussion of consistency with the Local Coastal Program. Please also see Master Response #4: Modifications to Seaside Lagoon. 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 PC355-17

15. Section 3.12.3.2, page 3.12-14: The Waterfront Project violates this section of the low-coast visitor-serving recreational uses.

Response to Comment PC355-17

Please see Draft EIR Section 3.9 for discussion of consistency with the Local Coastal Program. The proposed project does continue to provide for public access to and throughout the project site (including improved

pedestrian and bicycle connections), it continues to provide low-cost visitor-serving recreational uses (including removing an admission fee for Seaside Lagoon and retaining and enhancing places for people to walk, bike, and access the waterfront) and visual resources (by enhancing the promenade by the water's edge and providing enhanced public seating and gathering spaces where the public can experience the coastal setting). Please refer to Response to Comment PC333-20 for more information.

Comment PC355-18

16. Section 3.12.3.4, page 3.12-15: The notion of maintaining and improving the recreational elements of the coastal resources are being violated (for example Item 12).

Response to Comment PC355-18

Your opinion is noted. Please see Draft EIR Section 3.9 for discussion of consistency with the Local Coastal Program. Please also see Response to Comment PC355-17.

Comment PC355-19

17. MMTRA-2, page 3.13-3: The number of street lanes was recently reduced on Herondo Street with inclusion of bike lanes and diagonal parking. It just does not make sense to redo Herondo. Is Redondo Beach paying for the re-modification of Herondo? This is what happens without an up-to-date general plan.

Response to Comment PC355-19

The commenter's opinion is noted. Please see Response to Comment PC136-3 regarding mitigation measure MM TRA-2. Please also note that development on the project site is controlled through the Local Coastal Program, which was adopted by the City Council, the Electorate, and Coastal Commission and became effective in 2010.

Comment PC355-20

18. MMTRA-6, page 3.13-4: I believe the southwest corner is in the City of Torrance. Redondo Beach (the applicant) should pay for the mitigation. The southbound left turn lane at the intersection should also be modified at the same time since the southeast corner of the intersection (Redondo Beach) will be undergoing revitalization in the future.

Response to Comment PC355-20

Traffic mitigation associated with the proposed project is the responsibility of the applicant (in this case, per the language in the mitigation, MM TRA-6, a fair share contribution would be made for the improvements). 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 PC355-21

19. Parking, page 3.13-5: The under utilization of the King Harbor Marina parking lot is due to the non-competitive nature of the small boat host operation. The small boat

operators are being neglected in Redondo Beach. This is contrary to what the Coastal Act requires. At one time, the parking lot was inundated with vehicles with boat trailers.

Response to Comment PC355-21

Please refer to Master Response #8: Boat Ramp in King Harbor. 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 PC355-22

20. Promote Alternate Transportation Mode, page 3.13-6: The peak time at the harbor is on weekends and holidays when the public transportation system is under reduced schedule unlike the schedule cited in the report, which is the weekday schedule. It is apparent that the people who are involved in this analysis are out of touch with what is going on in the real world. Few years back, to reduce the operating cost of the transit system, schedules were reduced. Likewise, the fare structure was altered to cover the increased cost of transit operation.

Response to Comment PC355-22

Please see Response to Comment AL001-20 regarding mitigation measure MM TRA-7 and Master Response #7: Waterfront Parking. Please also see Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project for information of weekend traffic. Please also see Draft EIR Section 3.13.2.3.4 for discussion of existing transit service.

Comment PC355-23

21. Redondo Beach Parking Requirements, page 3.13-38: Why there is no trailer parking regulation for boat trailers? Where are the ADA requirements?

Response to Comment PC355-23

The Redondo Beach Municipal Code does not have a parking requirement for a boat ramp as there is none currently within the City. As with new development, the parking associated with the boat ramp will need to comply with the American With Disabilities Act. Please also see Master Response #7: Waterfront Parking.

Comment PC355-24

22. Section 5.6.2, page 5-20: It is clear that the person who analyzed this section have found what I was unable to find in the AECOM analysis; i.e., the project's performance when we have a business down turn. To assess business risk, one must also know what to expect when business cycle is in the trough, especially one like the Great Recession.

This section tells me that the project can survive a business down turn like the Great Recession. I hope you are correct in your findings because the result would be Chapter 11 and urban decay. Could you provide me where in AECOM's report you found the business down turn data?

Remember, the project must withstand both the good and bad business scenarios, especially in a consumption based business environment of the United States. Yes, there are few business offices in the project, but they alone could not carry the weight during a recession, in fact, they could be shuttered.

Response to Comment PC355-24

Discussion of Urban Decay is provided in Chapter 5 of the Draft EIR. Please also see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. The AECOM Market Study is included as Appendix O to the Draft EIR. The comment is noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC355-25

23. There are upside down pages in the Section of the EIR Scoping Comments. They occur between Lisa Falk's July 10, 2014 document and Leslie Fiske's July 21, 2014 document. I cannot tell if the upside down pages belong in this section since I cannot turn my monitor upside down.

Response to Comment PC355-25

These pages will be corrected in the Final EIR (refer to Chapter 3, Modifications to the Draft EIR within this Final EIR). Please also be aware that pdf files can be rotated in adobe acrobat by selecting "View" and then selecting "rotate view."

Comment PC355-26

24. Appendix E2, Historic Resources Evaluation Report, Table 1, page 42: Kincaid's is listed as being constructed in 1986. The old Horseshoe Pier was destroyed in 1988 so Kincaid's that is on the new Horseshoe Pier could not have been built in 1986.

The Redondo Beach Hotel was formerly the Sunrise Hotel that underwent remodeling in 2013 - 2015. Therefore, it could not have been constructed in 2015 as shown in Table 1.

Response to Comment PC355-26

Kincaid's was constructed in 1996. To clarify, the former hotel at the northeast corner of Harbor Drive and Portofino Way was remodeled and reopened as the Redondo Beach Hotel in 2015 (which is a hotel under the Sunrise Hotel chain). These pages will be corrected in the Final EIR (refer to Chapter 3, Modifications to the Draft EIR within this Final EIR). The comments are noted and will be included in the Final EIR presented for review and consideration by the City's decision-making body.

Comment PC355-27

25. Page 44: It is concluded that the removal of the Sportfishing Pier is significant and unavoidable. My perception is that greed for money is dictating the decision. Yes, it would cost money to repair the pier because of the City's negligence in the maintenance of the structure. Therefore, the City should pay for the repairs/restoring of the pier. Furthermore, by demolishing the pier and not replacing it, the commercial footage could be transferred to Uplands where there is no Tidelands restriction.

Response to Comment PC355-27

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. 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 PC355-28

26. 140 - 696 The Village/Seascape, page 51: The Village Development contains Ocean Club (formerly The Village Apartments), The Village Condominiums and Seascape Condominiums. Their addresses are 140 through 696 The Village. If my memory is correct, the last project was the Seascape 3 Condominiums with address numbering in the 500s. Seascape 3 fronts on Catalina Avenue and nestled between The Village Drive, The Village Condominiums and Casa de los Amigos.

I may be wrong on this, but the pattern of numbering tells me that 110 may be the lowest number rather than 140.

Response to Comment PC355-28

The commenter is correct. These pages will be corrected in the Final EIR (refer to Chapter 3, Modifications to the Draft EIR within this Final EIR).

COMMENT LETTER NO. PC356**SUZANNE MCCUNE**

Comment PC356-1

I love the rustic quaint Redondo Beach Pier that is making a very nice comeback and do not want it demolished.

The existing buildings are vintage, iconic landmarks!

I want to save **Polly's on the Pier** and the sport fishing pier. I also want to save the **Fun Factory** and other stores and eateries on the **International Boardwalk and Pier**.

I am also concerned that the waterfront is next to a residential neighborhood and that this project will impact the quality of their life with excess noise, crowds, pollution and loss of their ocean view which will devalue their property.

Another concern of mine will be the traffic gridlock on the narrow two-lane Harbor Drive that is the main access road to the waterfront along with PCH which is already a very congested thoroughfare.

I do not want an expensive boutique movie theater, a tall multi-story parking structure that will block ocean views and take away existing parking that has close, easy access to the launching dock for boaters and people with SUPs. I also do not want any retail shops and an over-sized market hall to be built along the Boardwalk. People don't go to the waterfront to shop and watch movies! As you know, the Seaport Village built on top of the parking garage went belly up only one year after it was built.

I also do not want a boutique hotel since there are already plenty of nice hotels in this area. The proposed hotel is too tall in height which will block ocean views.

There will be several years of construction noise affecting potential resale value for the nearby residences.

I am also concerned about a lack of provisional leases for the existing businesses (the rents will go up forcing them out of business).

I also want to save the **Seaside Lagoon**. Opening it up to the polluted ocean water that will be taken over by sea lions will be a hazard and prevent people from safely swimming there.

Also, Redondo Beach is home to protected birds (the Brown Pelican and the Great Blue Heron) and the migratory Humpback Whales that could be endangered by this project. The Pelicans hanging out on the pier provide lots of fun entertainment when they interact with the fishermen and tourists.

I would like the existing parking garage to be repaired (damaged over the years by the neglect of the City to properly maintain it).

Response to Comment PC356-1

Your opinion is noted. The comment does not introduce new environmental information or directly challenges the information presented in the Draft EIR.

Refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on the pier, Master Response #4: Modifications to the Seaside Lagoon regarding the proposed improvements to the lagoon, Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, and Master Response #9: Views and Scale of Development.

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). Refer to Section 3.3 and Response to Comment PC085-1 for additional details. Please also see Draft EIR Section 3.10 for discussion of noise, Section 3.8 for discussion of water quality, Section 3.1 for discussion of air quality, and Section 3.13 for discussion of traffic.

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 PC356-2

Regarding the complaint of a few of the current business owners on the Boardwalk that they are struggling because of fewer visitors and shoppers, it is important to remember that the Waterfront is a seasonal venue that peaks in the summer time and slows down in the winter time.

I believe that the residents and the City can work together to revitalize the existing waterfront in an economical manner that won't cost \$400 million and could be completed in a shorter time frame than this enormous proposed project.

This project is much too large for the small parcel of land that it will be built on. I support Revitalization of the Waterfront but don't want to Supersize it with this project...!!!

Thank you for your time to review my comments.

Response to Comment PC356-2

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 restaurant use, 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." It should be noted that the Draft EIR analyzed a reduced project alternative (Chapter 4, Analysis of Alternative, Alternative 7). The comment 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. PC357**KN**

Comment PC357-1

Rb sportfishing must be part of the new waterfront development. I and many so bay residents have been fishing here for years since the pier opened in the early 70's. From the isle or redondo barge, city of redondo sf, redondo special, voyaget whale watching, indian and tradition were all great boats. Larry durr has done a fantastic job as well as scotty and capt eric hobday working his butt off even during the pier closure. Polly's and rbsf are like peas and carrots. Without them a new waterfront shouldnt happen. Cecil king would definately fight to keep rbsf. Roy and Doris Peters would do so as well. Rb sportfishing is a must. Just ask any local fisherman. They'll tell you.

Response to Comment PC357-1

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. PC358**JULIUS J MONDRAGON III**

Comment PC358-1

Please find attached a PDF file with my comments on the Redondo Beach Waterfront EIR.

As a 23 year resident of Redondo Beach, I would like to express my grave concerns about the EIR Report

For the Redondo Beach Waterfront Project:

1. The Traffic data study was conducted during the spring of 2013 and summer of 2014. Harbor Ave. was a four lane street at that time. In 2015 Harbor Ave. was converted to A two lane street with a bike lane which negatively affects the traffic conditions on Harbor Ave.
2. Future traffic conditions were provided without the proposed Waterfront Project traffic conditions to the Waterfront.

Response to Comment PC358-1

The lane geometries associated with the conversion of Harbor Avenue as part of the Herondo Gateway project (Draft EIR Appendix L1, page 20) are accounted for in all analyzed traffic scenarios, with the level of service results reflecting the reduced traffic capacity associated with the project, and the project impact assessment accounting for the level of service effects of this reconfiguration. Intersection lane configurations are also illustrated in Figures 1 through 6 in Appendix X-2 of the Transportation Impact Study (Appendix L1 of the Draft EIR), which have been updated and included in Chapter 3 of the Final EIR.

The commenter also asserts that “future traffic conditions were provided without the proposed Waterfront Project traffic conditions. As detailed in Section 3.13.4.1.1 of the Draft EIR (and Appendix L1), four scenarios were analyzed for potential impacts to key intersections, including (1) Existing (2013) Conditions, (2) Cumulative (2019) Conditions Without Project, (3) Existing (2013) plus Project Conditions, and (4) Cumulative plus Project Conditions (2019).

COMMENT LETTER NO. PC359

SUSAN PETKUS

Comment PC359-1

I'm very concerned about the exclusion of Sportfishing in the new Waterfront development plans.

My son-in-law has owned the Redondo Special Sportfishing boat for 6 years now and he has been fishing out of Redondo Harbor for over 36 years.

By eliminating Sportfishing, you will be taking his livelihood away. When he bought the Redondo Special he also bought the run out of Redondo Harbor. How would he be able to continue to support his family?

Sportfishing is a very popular sport and I just can't imagine how or even why you would exclude it in your plans. Please stop this madness!!

PS Please let me know what I can do to make sure Sportfishing in Redondo continues on!!

Response to Comment PC359-1

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. PC360

HEIDI BUTZINE

Comment PC360-1

I strongly support the efforts to revitalize the Redondo Beach Waterfront. I'm a South Bay native, born and raised, and I ultimately moved to Redondo Beach because I would always drive in from Torrance and Lomita to come enjoy the beach, Pier and the Waterfront.

I sold my home in Torrance to move here and I've lived in Redondo Beach as a single-family homeowner since 1998. Over the past 18 years, I've purchased two homes in Redondo. My first house was located on Catalina Avenue at Garnet. We were within easy walking distance to the Pier and Waterfront, which we frequently

enjoyed since we didn't have to get in the car and drive. I only wish I were still living at that property again to enjoy the enhancements, dining, activities and amenities that a revitalization like this will offer. I currently live on Maria Avenue and spend a fair amount of time at the Waterfront attending, participating or volunteering at many community events and see that there is an urgent upgrade needed.

I have reviewed the DEIR, attended two of the public sessions, and shared my public comment. I see this as an opportunity to keep the vitality of our city strong for the near future and future generations. Cities today are challenged to maintain significant job-creating and revenue-generating industries. As more of our California cities become 'corporate ghost towns' losing industry to significantly friendlier business communities in other states, I believe it's up to us as responsible citizens and stewards of Redondo Beach to proactively support and boost our local economy. I see the Waterfront Revitalization as an incredible opportunity to do that, by creating a space that allows for local small businesses to thrive within an environment that attracts locals and tourists alike. I believe a well-balanced and properly curated mix of locally owned businesses and other types of businesses are needed to keep the area vibrant and bringing revenue to our city.

CenterCal has consistently presented their intentions to include local businesses in their vision for the Waterfront, especially those that currently operate along the International Boardwalk and the Pier. The only significant issue that I see is that there needs to be a requirement that CenterCal reserve a certain amount of space for locally owned, independent businesses to be represented in the project. A negotiated local business set-aside of some percentage of commercial tenant mix, with a portion of this set-aside going to financially viable and qualifying "locally-based small businesses" which could provide further incentive for businesses with one or two locations to open an additional location at the Waterfront.

Response to Comment PC360-1

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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. PC361

MIRIAM DWINELL

Comment PC361-1

While I appreciate some of the work being done to improve the pier, I want to voice that I believe it would be a huge misstep to take away the character of Tony's which is an iconic piece of California history. So many historical restaurants have been either demolished or remodeled so that the character of old California is lost. Let's preserve 208210 Fisherman's Wharf and keep the greatness that we are lucky enough to still have preserved!

Response to Comment PC361-1

Refer to Response to Comment PC312-1. 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. PC362

LINDA AKYÜZ

Comment PC362-1

Attached please find my comments on the Waterfront DEIR. My contact information is included in the letter.

I am writing this letter to submit my official comments on the **Waterfront Draft EIR** Cultural Resources summary and the Cultural Resources appendices.

1. Paleontological Resources: The recommendations and mitigation measures are appropriate, except that language referring to Society of Vertebrate Paleontology (SVP) guidelines and ethics should be included regarding qualified paleontologists and mitigation measures to be followed.
2. Archaeological Resources: The report and recommendations are appropriate. However, the cultural background of the Tongva (Gabrieliño) was limited and could have been more developed. AB 52 came into effect after the initial coordination with Tribes, but an addendum documenting compliance with AB 52 and coordination with tribes that are traditionally and culturally affiliated with the geographic area of a project should be added. The recommendations and mitigation measures are appropriate.
3. Historical Resources: The report identified resources that qualified as historical resources according to California Register of HR or Redondo Beach Preservation Ordinance guidelines, including Tony's on the Pier. The background portion was well researched.
 - a. Recommendations for historical resources (resources should be identified in a table in the report with a CRHR status code and corresponding recommendations) with Status Codes 1, 2, 3, 4, or 5 should include preservation as the first option. The report and summary did not include preservation as an option, only mitigation measures. The Project should be redesigned to avoid any impacts to historical resources.
 - b. Seaside Lagoon is eligible for inclusion in the local register and the CRHR, although the report and resource record do not indicate this. Alterations to Seaside Lagoon were made as recently as 2008, without appropriate environmental review; however, these changes have not altered its integrity (as defined by California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register). Seaside Lagoon still qualifies as a 5S2, or an individual property that is eligible for local listing or designation because it still conveys the feeling of its era of construction, eligible as a vernacular landscape that embodies the distinctive characteristics of a type, period, region or method of construction.
 - c. The International Boardwalk has undergone many alterations but still qualifies as a 3CS, although it has not been evaluated as such in the report. It appears eligible for CR as an individual property through survey evaluation. Changes have not altered its integrity (as defined by California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register).

An addendum to the report and EIR re-evaluating resources as necessary should be conducted before sending recommendations to the California SHPO. Tony's (and the Horseshoe, in order for Tony's to have an appropriate context), Seaside Lagoon, and the International Boardwalk should be preserved in place and integrated appropriately into the Project's design. Paleontological investigations and mitigations should be conducted by a qualified paleontologist. Archaeological investigations and mitigations should be conducted by a Secretary of the Interior-qualified archaeologist and a Native American Monitor recommended by one of the NAHC-designated contacts.

A Waterfront that is accessible to all and that retains and honors Redondo Beach's unique character, heritage, and history is the best option.

Response to Comment PC362-1

The commenter's opinion on the text of mitigation measure MM CUL-5 is noted. The mitigation measure as currently drafted provides sufficient guidance regarding the qualifications of the paleontological monitor ["a qualified paleontologist (i.e., a paleontologist with a M.S. or Ph.D. degree in paleontology or geology and familiar with paleontologic salvage or mitigation procedures and techniques"].

Preservation of significant historical resources is the preferred outcome if feasible, as stated on page 55 of Appendix E2 of the Draft EIR. 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 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 timber portion of the Horseshoe Pier is in very poor condition, 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 also states that "AB 52 came into effect after the initial coordination with Tribes...an addendum documenting compliance with B 52...should be added." Contrary to this assertion, AB 52 is not applicable to this project, as noted on Draft EIR page 3.4-44:

Although signed in September 2014, AB 52 applies to those projects for which a lead agency has issued a NOP of an EIR or notice of intent to adopt a negative declaration on or after July 1, 2015. [AB52, Section 11(c).] The NOP for the proposed project was released in June 2014, consequently these requirements are not applicable to the proposed project. Nevertheless, Native American consultation was performed as noted above.

The commenter also asserts that the cultural background of the Tongva was limited and could have been more developed. The Draft EIR "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." The information provided on Draft EIR page 3.4-7 and 3.4-67 was sufficient to fulfill this requirement.

Regarding comment a. - this is a report formatting preference on the commenter and not in any way a requirement. As noted above in this response, preservation in place is not considered a feasible mitigation option. The Draft EIR included Alternative 1, which does not involve demolition; however, as noted in Chapter 4 of the Draft EIR, Horseshoe Pier is in very poor condition, as well as the buildings, which includes Tony's and its companion structure, which would be closed to the public in the future if the necessary structural repairs cannot be made. Comments b. and c. reflect differences in professional opinion. Contrary to the implications in the comment, Seaside Lagoon and the International Boardwalk were considered in the Draft EIR, and were determined to not be historic resources. (See Draft EIR page 3.4-52 through 3.4-53.) After careful study of the history of development of the Seaside Lagoon and International Boardwalk, assessment of documented alterations to the properties, and detailed inspection of their present physical condition, it was the finding of Mr. Dana N. Slawson, M. Arch from Greenwood and Associates (who has 30 years of experience in the field of architectural history, with 23 years of local professional experience) that both of these properties have lost

integrity of design to the extent that they no longer convey a sense of association with the period of their creation, nor with important historical events or any patterns of activity with which they were associated, nor any of the other criteria outlined in Section 3.4.4.1.1 of the Draft EIR. Both properties have been dramatically altered over time and do not constitute Historical Resources, in Mr. Slawson's professional opinion.

As detailed in Section 3.4 of the Draft EIR, mitigation measure MM CUL-4 states that the archaeologist in charge shall meet or exceed the qualifications set by the Secretary of the Interior's Standards and Guidelines as published in the Code of Federal Regulations, 36 CFR Part 61. As for Native American monitoring, mitigation MM CUL-4 includes a Native American monitor associated with the Phase I archaeological evaluation for excavation activities (either prior to or during excavation) of the northeast and southern edges of the project site as shown on Figure 3.4-5 Phase I Archaeological Mitigation Area of the Draft EIR. The commenter's suggestion to leave the International Boardwalk and Seaside Lagoon in place are considered infeasible. These suggestions are inconsistent with the project objectives, including but not limited to adaptation for sea level rise, enhancement of public safety, and providing improved connectivity. As noted on Draft EIR page 2-22, the Seaside Lagoon is unlikely to maintain its current operating conditions in the foreseeable future:

Water in the lagoon is supplied by cooling water used in the nearby AES power plant....Current challenges to Seaside Lagoon include the tightening water restrictions relative to discharge from the lagoon (as detailed in Section 3.8, Hydrology and Water Quality) and the potential future loss of the heated water sources as the AES power plant moves away from the use of ocean water cooling. State Water Resources Control Board adopted Resolution No. 2010-0020, which generally requires that the use of existing AES power plant cooling systems that rely on natural ocean waters be terminated throughout the State of California by 2020.

While chlorination and de-chlorination 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 the last 10 years has been difficult. Since the implementation of the lagoon's first NPDES Permit in 1999, the City has been fined \$195,000 for water discharge violations. The vast majority of these violations were for the discharge of total suspended solids (TSS). After extensive examination by water quality experts and City Engineering staff, it was determined that there would be no cost effective way to treat or filter TSS in the high volume of water discharged by the lagoon.

The commenter professes opinions that reflect differences in professional opinion, those differences are noted here. However, disagreement amongst experts does not make an EIR inadequate. (CEQA Guidelines Section 15151.) 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. PC363**ROB PETERSON**

Comment PC363-1

I'm not sure what this comment will do but I am a huge supporter of the revitalization and demand this city move forward and take advantage of the incredible opportunity we have. Everybody can admit the pier is a total dump and a total wasted opportunity, not just financially but culturally as well. We have a chance to construct an incredible escape for all families in Redondo right in our backyard. Think of the memories all families can enjoy at a revitalized pier instead of worrying about the safety of the dilapidated parking structure or the sketchy characters lurking around the pier. Let's ignore the complaints regarding noise and construction. We can't let these niggers force us to live with the status quo.

If you don't want traffic, move to Riverside or another undesirable area. It's a simple fact in life as we improve the area, our residents will utilize the area more and deservedly so.

If you don't want construction, then let's watch as the pier crumbles and literally falls apart on its own...

Let's think about the long term vision of this city and for our younger generation! Stop kicking the can down the road and wasting city funding with more wasteful reviews and opinions.

I'm tired of Hermosa or Manhattan being my go to destination and taking city revenues away from Redondo. It's time to plan for the future instead of squabbling over frivolous issues and pandering to the headstrong complacents. Can we please get this city to move FORWARD!

Response to Comment PC363-1

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. PC364

HENRY FOLSON

Comment PC364-1

- I. The photos of the project area are wide angle views that do not match the focal length of the eye. Documents now are digital, published on the Web, and photos & drawings can be presented in a range of resolutions.
 1. At the very least, the focal length(s) used must be identified.
- II.
 - A. The DEIR does not include a 3D digital model of the Project.
 1. Architectural firms routinely use 3D design programs for projects of all sizes.
 2. Simple rectangular blocks with no detail other than length, width, and height would allow, for example, 'Drive throughs' at 15 mph (22 feet/second) and 'Walk Throughs' at 2 mph (3 feet/second). This separates fact from fantasy. And it discourages the presentation of fantasy...

Response to Comment PC364-1

It is unclear what photographs/figures the commenter is referencing. Different figures are utilized for different purposes in the Draft EIR. For example, Figure 2-2 in the Draft EIR is intended to provide historic background information associated with the project site and are not intended to represent simulation of the views associated with the human eye. With the exception of the Key Observation View photos in Section 3.1 of the Draft EIR, the photos were not used for any detailed simulations or analysis. The photographs used for the visual simulations were taken with a 21 millimeter camera lens to mimic the human field of view.

As for the commenter's request for a 3D model, refer to Response to Comment PC008-1.

Comment PC364-2

- III.
 - A. At least a half dozen Malls in the South Bay have completed, or are working, on multi-million dollar expansions or upgrades.

1. How does the DEIR consider the possibilities of market saturation, over-building, and an uncompleted Redondo Harbor Project?

Response to Comment PC364-2

The proposed project is not a ‘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 use, including a public market hall, than retail. Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for discussion of the viability of the project. Please also see Draft EIR Chapter 5, Other CEQA Considerations, for discussion of urban decay on- and off-site. Your comment will be included in the Final EIR presented for review and consideration by the City’s decision-making body.

Comment PC364-3

2. While we can’t easily quantify these scenarios, we can address them:
 - a) For example, The EIR can prioritize what gets built, and in what order.
 - (2) Elements with lower environmental impact would get higher priority.
 - (3) The costs for users, such as parking fees, admission fees, restaurant meals, etc. can be ranked.

Response to Comment PC364-3

The commenter’s suggestions are noted. Chapter 4, Analysis of Alternatives of the Draft EIR does analyze an alternative that includes phasing of the project (Alternative 6 - Alternative Construction Phasing).

Comment PC364-3

3. Promoters of this Project completely ignore that the CenterCal Mall is the only one that has no potential customers West of the project.

Response to Comment PC364-3

As for the project being a mall, 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). Please see Draft EIR Appendix O for discussion of the geographic scope of the Market Study.

Comment PC364-4

- B. A scenario that the CenterCal Project can only be half as successful as projected has to be allowed for.
 1. For example, the 3 story parking structure should start out as one story with parking at ground level and on the roof. It will be about half as long. It will be built to accept the addition of another story, if the need ever develops.
 2. This approach protects all the stakeholders.

Response to Comment PC364-4

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 LETTER NO. PC365**TRICIA PETKUS**

Comment PC365-1

I'm very concerned about the exclusion of Sportfishing in the new Waterfront development plans.

My husband owns the Redondo Special Sportfishing boat and he has been fishing and working out of Redondo Harbor for over 36 years, since he was 14 yrs. old.

By eliminating Sportfishing, you will be taking our livelihood away. When he bought the Redondo Special he also bought the run out of Redondo Harbor. How would he be able to continue to support our family?

Sportfishing is a very popular sport and I just can't imagine how or even why you would exclude it in your plans. Please stop this madness!!

PS Please let me know what I can do to make sure Sportfishing in Redondo continues on!!

Response to Comment PC365-1

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. PC366**JEFF SALLEE**

Comment PC366-1

As a resident and business owner in Redondo Beach I support the waterfront redevelopment effort is described in the DEIR. The economic engine necessary to support the infrastructure has been lacking for so long the area has become a blighted and in many ways dangerous to residents and visitors.

While the proposed landside development appears to be viable in terms of density of retail and open space, the traditional marina offerings have not been clearly described. Specifically how the public will be able to interact with our ocean.

Every indication prior to the release of the DEIR was that CenterCal as the developer would be responsible for integrating a cohesive marina use plan consistent with the retail proposed and traditions of our on-water recreation opportunities.

The removal of the sport fishing pier and recreation related detail from this effort is very concerning. The Redondo Beach Marina, Seaside Lagoon and proposed boat ramp and how the public can interact with the ocean are severely lacking in the DEIR.

It appears that both CenterCal and the city are not being forthcoming about the plans in this regard and there are no provisions for addressing these questions outside of this EIR.

Response to Comment PC366-1

(4) 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.

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. 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." The environmental impacts of all the elements associated with the proposed project (including the marina in Basin 3, lagoon, proposed boat ramp, etc.) are extensively analyzed in the Draft EIR. 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. 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. PC367

HEIDI L. VAN DE WOUW

Comment PC367-1

I am a long time resident of Redondo Beach and spent many summers as a child commuting on my bike from Avenue A to the King Harbor Yacht Club and Lanakila daily for both sailing and paddling practice. My mother grew up in Redondo Beach, my father in Manhattan Beach, and both are home owning residents of Redondo Beach.

I think it is important for the city to acknowledge that many residents do not favor the over development of our beach front, this has been shown time and time again in various elections (the disapproval of the "Heart of the City" project, etc.). I have a few concerns about the project:

-Increased traffic and parking congestion: I believe it of importance that traffic on Catalina, south of the project, and on the Esplanade does not increase, with traffic directing measures to allow for traffic to utilize more substantial streets, like PCH and Torrance Blv. I think it is important to utilize Herondo Ave. as a means of coming and going (190th is a major through-way). Also of importance to me is the sentiment that the project should have it's own self contained parking with a MORE than adequate capacity. It would be unfortunate for the City of Redondo Beach to construct a large project such as this and burden long time residents of Redondo

Beach with noisy visitors parking away from the confines of the project, near residents (see Hermosa Beach on a Saturday night). It is also important to ensure safe passage for bicyclists (and pedestrians) using the area as a through-way from Redondo Beach to Hermosa Beach, etc.

Response to Comment PC367-1

Regarding the commenters concerns over traffic and parking, please refer to Section 3.13 and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project and Master Response #7: Waterfront Parking. Section 3.13 of the Draft EIR also addressed the safe passage for bicyclists and pedestrian throughout the project site, concluding that overall, implementation of the proposed project would enhance both pedestrian and bicycle facilities through and adjacent to the project site. For additional information on bicycle and pedestrian safety, please refer to Response to Comment PC081-2.

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 PC367-2

-Water quality: King Harbor's greatest aspect is the WATER, and Redondo Beach is home to many water men and women. Of such it is important to residents of Redondo Beach that the City ensures to us from construction through the life time of the new harbor waterfront that protection of water quality is of serious concern. I am concerned that BMPs will not be followed in the construction of this project and feel it is important that the City will take it upon themselves to help direct and enforce the use of BMPs. Additionally, I believe it is important for the construction of this project to incorporate scientifically proven methods of water catchment and water conservation, especially if the percentage of impervious surfaces increases. It is imperative that the City works along with the LARWQCB and possibly with the UC Davis Cooperative extension, or the NRCS to maximize the protection of water quality. As seen with the Sea Side Lagoon, regulatory measures imposed upon the City are costly and it would be good to have a good working relationship with, and direction from, regulatory agencies and agencies that work closely with regulators.

Response to Comment PC367-2

Please see Draft EIR Section 3.8, Hydrology and Water Quality, for discussion of water quality. The proposed project 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.) Operational BMPs would be reviewed prior to the issuance of a certificate of occupancy. The project would also be subject to a series of construction water quality regulations, as discussed in Section 3.8.3.3 (beginning on page 3.8-49) of the Draft EIR. All development projects in the City are required to comply with the Redondo Beach Municipal Code sections regulating water quality, Title 5, Chapter 7 Stormwater and Urban Runoff Pollution Control Regulations. BMPs shall be identified to control stormwater pollution from both construction activities and operation. Regardless of construction site size, the City through its Municipal Code requires all construction sites to comply with minimum BMPs during construction as specified in the MS4 permit. Construction sites greater than one acre must also comply with the General Permit of Construction Activities (which is discussed in Section 3.8 beginning on page 3.8-45). All priority projects are required to prepare a local stormwater pollution prevention plan (LSWPPP). LSWPPP's must meet all SWPPP requirements as specified in the General Permit for Construction Activities. The City

provides pamphlets containing a list of acceptable BMPs appropriate for construction activities to reduce stormwater impacts related to sediments, erosion, general site management, and materials and waste management. Prior to construction, an authorized representative of the contractor must acknowledge receipt of the pamphlets. The City also performs on-site inspections throughout construction. 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 PC367-3

-Over development: We are Redondo Beach. We are laid back and not flashy. I am all for increasing and improving the amount of business occurring in the Harbor but we do not to have all of our shops in this one area. We should be able to go down to the harbor and do some leisurely strolling, boutique shopping, get some beers, eat some food, but this area should not be an area where I go and do my day-to-day shopping. Leave shopping centers inland!

As part of this I think it is also important to limit the use of lighting and take assessment on means to limit light pollution.

-Honor lease holders: The City needs to make sure that entities that have held leases and have supported the economy of Redondo Beach are not displaced because of this new development. Additionally, I believe it is important that organizations promoting active, healthy lifestyles to children, such as the KHYC and Lanakila, continue to run with minimal disturbance while this progress continues.

Thank you for your time and commitment to this project,

Response to Comment PC367-3

As discussed in Chapter 2 of the Draft EIR, the current development intensity for the project site was subject to extensive public review, which included approval by the City Council, the Redondo Beach electorate (Measure G), and the California Coastal Commission. As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher [Floor to Area ratios] 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." This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles. Please see Draft EIR Section 3.1, Aesthetics and Visual Resources (under Impact AES-3) regarding lighting from the project (which was found to be less than significant). 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 LETTER NO. PC368

ERIC HOBDAY

Comment PC368-1

I'm very concerned about the exclusion of Sportfishing in the new Waterfront development plans.

I own the Redondo Special Sportfishing boat and have been fishing and working out of Redondo Harbor for over 36 years, since age 7. I first started fishing with my grandfather in Redondo Beach at 7 yrs. old. I have many loyal customers and friends with similar experiences fishing at Redondo Beach. A lot of my customers

who began fishing with their parents and grandparents are carrying on the tradition and bringing their children and grandchildren.

By eliminating Sportfishing, you will be taking my livelihood away. When I bought the Redondo Special I also bought the run out of Redondo Harbor. How would I be able to continue to support my family?

Sportfishing is a very popular sport and a tradition that has a long history in Redondo Beach and I just can't imagine how or even why you would exclude it in your plans. Please stop this madness!!

PS Please let me know what I can do to make sure Sportfishing in Redondo continues on!!

Response to Comment PC368-1

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. PC369

JIM MONTGOMERY

Comment PC369-1

Attached are my comments on The Waterfront DEIR. Please let me know that you have received them and they are now part of the public record for this DEIR.

I have been a resident of the South Bay since 1983 (30+ years) and a resident of Redondo Beach from 1988 to 2008 (twenty years). I have lived, worked and played in the South Bay for decades and have deep concerns regarding the detrimental impacts that the proposed Waterfront overdevelopment will have on the quality of life for all South Bay residents and the environment.

I attended the December 9, 2015 public workshop held by the City of Redondo Beach at the city's main library. I have reviewed enough of the DEIR to find severe shortcomings that calls into question the credibility of the entire DEIR and the vendor the city hired to perform the DEIR. It is incomplete and down plays or ignores obvious impacts. The development will have numerous, significant, unavoidable impacts that cannot be mitigated regardless of what the DEIR states.

I work as a system engineer for an institution that is engaged in space exploration. As part of my job I perform trade studies, risk analysis and mitigation on billion dollar space missions where risk must be accurately assessed and mitigations put in place to reduce risk to acceptable levels. **Based upon my professional knowledge and years of experience performing these activities, I have found The Waterfront DEIR to be fatally flawed, incomplete and misleading in its analysis and subsequent conclusions.** At my workplace, this impact assessment would be met with severe criticism and rejected. Due to this, the current DEIR needs to be withdrawn and a complete, unbiased analysis must be performed to adequately assess impact. The quality of life for the residents of the South Bay and the environment demand it and those performing this DEIR have done a grave disservice to us all. The city and residents have been given an incomplete and inaccurate assessment of the impact of The Waterfront Development. The City of Redondo Beach should reject this DEIR and demand the paid vendor of this DEIR correct their flaws, or find a new vendor that is up to the task.

Below, I will give examples of where the analysis and subsequent findings are incomplete and biased.

Response to Comment PC369-1

The comment states an opinion that will be included in the Final EIR presented for review and consideration by the City's decision-making body. Please see Response to Comments PC369-2 through PC369-8 for specific responses.

Comment PC369-2

Traffic

- It appears that traffic is only assessed for weekdays and anyone who frequents this harbor area knows that traffic impacts are much worse on the weekends. This omission is so obvious and the impacts so different between the two that it calls into question the competence and impartiality of those producing the DEIR.
- Even ignoring the weekend traffic, the addition of over 12,000 vehicle trips per day will severely impact traffic flow in the area.
- DEIR ignores traffic impacts of surrounding developments such as the AES site that are sure to occur in the future. The DEIR should look at a few possible development sizes such as those proposed in Measure A and B and include this in the traffic assessment. Without this analysis, the traffic assessment is biased, flawed and incomplete.

Response to Comment PC369-2

Refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project regarding weekend traffic. Refer to Master Response #1: AES Power Plant Site for information regarding that site.

Comment PC369-3

Parking

- The number of new parking spaces proposed is inadequate to support the amount of new development.
- The amount of development is proposed to increase from 219,881 sq ft to 523,939 sq ft, about 140%.
- The number of parking stalls is proposed to increase from 2,192 now to 2,363, about 7% more.
- The demand for parking will greatly exceed supply
- Either parking has to be increased significantly or the development has to be dramatically reduced.

Response to Comment PC369-3

See Section 3.13 of the Draft EIR and Master Response #7: Waterfront Parking for information on on-site parking.

Comment PC369-4

Views

- The public comes to the harbor and beaches to enjoy open vistas and the sound of waves.

The development will destroy a large fraction of these views and beach experience.

- A three---story, 45' tall parking structure will eliminate a large fraction of views that currently exist. Additional multi---story structures will be built throughout the area, destroying existing views.
- When jogging, riding our bikes or driving down Harbor Drive, instead of seeing the ocean and Palos Verdes the public will be in a canyon of buildings with "view corridors." This impact to the harbor and ocean experience by the public is dramatically understated.

Response to Comment PC369-4

See Section 3.1 of the Draft EIR and Master Response #9: Views and Scale of Development for information on views.

Comment PC369-5

Public Safety

- The Seaside Lagoon is an enclosed, treated waterway enjoyed by families, especially those with small children. It is safe area in which the public can enjoy the waterfront.
- The proposed development would dramatically reduce the size of the lagoon and open it up to polluted ocean water. The space would be shared with boats, stand---up paddle boarders and other users.
- This formerly safe haven for families with small children will be lost, dramatically impacting the quality of life for a significant fraction of the beach---going public.
- The Seaside Lagoon is a unique resource and should not be reduced in size. It should not be opened up to ocean access.

Response to Comment PC369-5

See Section 3.13 of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon for information specific to the lagoon.

Comment PC369-6

Noise and Air Pollution

- Currently, one can enjoy a walk on the pier while hearing the sounds of the waves, birds and breath in the fresh air.
- The proposed development will connect Harbor Drive with Torrance Blvd and bring traffic with all the noise and air pollution these vehicles generate right to the pier area.
- This will detrimentally impact the quality of the ocean/beach experience of pier patrons. It should not be allowed.
- The proposed development is over 500,000+ square feet and will bring increased vehicular traffic into a small area, increasing air and noise pollution.

Response to Comment PC369-6

Refer to Section 3.10, Noise and Section 3.2, Air Quality of the Draft EIR.

Comment PC369-7**Environmental and Nature Impacts**

- a. The impacts to wildlife have not been adequately addressed. What is the plan for getting a baseline for wildlife who currently inhabit the area? What are the metrics for measuring the impacts that the construction and operation of this development will have on wildlife? Are there thresholds for stopping/modifying construction for wildlife adversely affected? Time of day/year constraints? Who does the monitoring? Reporting?

Response to Comment PC369-7

Section 3.3 of the Draft EIR includes a very detailed analysis of the potential for the project to effect biological resources. This analysis details existing conditions, regulations, methodology used in the analysis, thresholds to determine if effects would be significant, impact determination associated with the project, and finally the project and cumulative growth impacts. As for monitoring of mitigation measures, refer to the Mitigation Monitoring and Reporting Program of the Final EIR, which details timing and responsibilities associated with each mitigation measure.

Comment PC369-8

In closing, as a 30+ year resident of the South Bay who frequents the harbor and beach regularly, I am extremely concerned with The Waterfront Development as proposed. It is clear, based upon the examples above, that the DEIR is flawed, incomplete and biased in favor of the development. Even in the face of this flawed DEIR, it is apparent that a 500,000+ square foot development will have a severe impact on the quality of life of South Bay residents and the environment. For the producer of the DEIR to find otherwise is not credible. I recommend the city of Redondo Beach reject this DEIR and request that the current vendor produce a more complete, unbiased DEIR or hire a new vendor that is capable of doing so. The city of Redondo Beach and residents of the South Bay require this to be able to accurately assess the impacts that we will have to live with for many years to come.

Response to Comment PC369-8

The commenter has provided general information that does not introduce new environmental information or directly challenges the information presented in the Draft EIR; 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. PC370**JOSEPH ZELIK**

Comment PC370-1

Comments on Draft EIR:

I am concerned about the destruction of the State owned Tidelands by building the proposed Market Square in that location.

The Tidelands should stay as a part of the RB waterfront as they are a natural habitat of the sea creatures that live there, and a place for recreation and discovery by children and adults. The breakwater protecting these Tidelands must also remain.

The state should maintain ownership of the Tidelands that are currently granted to the City of RB, in the event the CenterCal Waterfront development is not a long term economic success.

Response to Comment PC370-1

The Tidelands were granted to the City of Redondo Beach in 1915; however, this legal designation no longer reflects the physical conditions on the project site. The regulations associated with the proposed exchange are discussed in Section 3.9.3.1. In addition, Section 3.9.4.3.2 in Section 3.9, Land Use and Planning of the Draft EIR, also described the allowable uses in the tidelands, which include visitor-serving uses such as commercial uses, restaurants, and hotels, including a use such as the proposed market hall. As discussed on Draft EIR page 3.9-29:

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.

As described in Section 3.9, 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 project's land exchange would not remove breakwaters, nor would it remove coastal zone or other land use protections for the area. Please refer to Response to Comment PC337-1. The commenter has provided general opinions on the project without providing 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. PC371

WILLIAM SCHWANEBERG

Comment PC371-1

Please review the attached comments.

AS I STATED IN THE PUBLIC MEETING, I THINK THE SCALE OF THE PROJECT IS TO BIG. THE PROJECT NEEDS TO BE DOWN SCALED. ASLO BASIN #3 WAS FOR COMERICAL VESSEL USE, WHERE, ARE THE COMERICAL VESSELS TO GO/ AND COMERICAL BUISNESS SPORTFISHING/FOSS MARITIME/CHEVRON

THE TRAFIC GOING INTO + FROM THE HARBOR/PIER IS GOING TO BE TO MUCH.

PLEASE DOWN SCALE PROJECT SUPORT THE COMERICAL VESSELS IN THE HARBOR!

Response to Comment PC371-1

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 hotel, cinema, office and 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). 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. 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). 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. PC372**PAUL A. SORCE**

Comment PC372-1

I am writing to express my support for saving Tony's On The Pier. My parents took me there many times in the 1970's when I was a Redondo Beach resident. While I currently reside in Huntington Beach, my wife & I visit the pier a few times a year in order to absorb the classic, old school vibe of the pier, the fish market, the arcade & Tony's. I don't know that I would make the trip to whatever modern replacement is planned. Thank you for your time.

Response to Comment PC372-1

Please refer to Response to Comment PC312-1. 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. PC373**AMY JOSEFEK**

Comment PC373-1

I am a South Bay resident who is quite pleased to see all of the interest in revitalizing the Redondo Beach waterfront. It is obviously run down and in need of updating.

However, as someone who very often takes advantage of the spectacular waterfront area for enjoyment, meals and walks with friends, I am horrified to see how some people seem to define "updating."

The plan presented for CenterCal shows a huge increase in square footage being envisioned for the Harbor; many of those square feet will come in the form of concrete walls that will serve to create "view corridors" and block much of the beauty that currently exists at the waterfront. This is already quite evident from an as-yet incomplete Shade Hotel (which already shuts out a huge swath of the view from the street), as well as the plans that clearly show that everything from the lovely motion of boat masts swaying in the harbor to the stunning PV peninsula will be obscured by the concrete poured in place of what now exists.

As I stated at one of the meetings, there are already massive retail spaces to the North, South and East of the harbor (with many of those spaces lying unoccupied). As everyone who's involved in the Galleria project must admit, the popularity of such spaces wax and wane with the times. Once these 300,000+ new square feet are forced onto this beautiful piece of earth, there will be no going back. It seemingly doesn't matter that there are already thousands of movie theatre seats that surround the pier; someone believes that everyone will be thrilled to view films in a theatre near the water, as if that will make a difference.

At a recent Redondo Beach Planning Commission hearing, one of the Commissioners acknowledged the errors in zoning that allowed multi-story apartments to be erected along Esplanade in past decades. It's too late to take back what was lost with those decisions, but it's not too late to learn from those mistakes, and preserve the highlights of the harbor, while upgrading the retail services that are necessary to pay the bills.

Might not a more creative idea and one that would have a long lasting positive affect on the area be to do something different than all of the surrounding communities? What about being the seaside city that actually

emphasizes all that is special about this harbor, and Redondo Beach's location in proximity to it? How about leaving the massive shopping spaces to the other cities, and creating something truly wonderful and unique by highlighting how fantastic a place this is. Naturally. Just keep water. No mall required.

Response to Comment PC373-1

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. The proposed project is consistent with zoning associated with the project site and waterfront area. As detailed in the 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. The proposed project is not a '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 use, including a public market hall, than retail. As for the projects vitality (including the specialty cinema), please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. Please also see Master Response #9: Views and Scale of Development. 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. PC374

MICHAEL & KATHRYN MESCALL

Comment PC374-1

I grew up in the South Bay. My wife and I revisited Tony's last summer and enjoyed a drink and a spectacular sunset. Please Redondo City Council, maintain this cultural treasure as is ,with minimal redevelopment.

As Joni Mitchell said, "They pave paradise and put up a parking lot," Please don't Make a theme park out of Tony's on the Pier.

Please develop a plan that includes preserving a historic, vibrant, anchor of the Redondo Wharf, Tony's.

Response to Comment PC374-1

Refer to Response to Comment PC312-1. 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. PC375

JOHN ALAN WALTI

Comment PC375-1

I am attaching my personal comments on this draft EIR. Thank you for accepting them as a Word document in the attachment below.

All comments are in a general sense and no specific chapter or line is referred to by number page or paragraph number.

Major Concerns: We are changing the whole atmosphere at this location from a friendly local area hang-out to a new venue that attracts out-of-town visitors to the area at the expense of less affluent locals.

For this reason a lot of amenities that now exist will be reduced in scope or completely eliminated. The most important of these activities is fishing from the piers and catching a boat to do a full day or half day fishing trip. The pier areas are now available to all fishermen for free from the piers. The areas to do this will be greatly reduced and will impact low income families that come down to catch fish to augment their purchased

food. This is also true for boat based fishing boats that are now is located at the “Sports Fishing Pier” that exists in the northern project area. What has been proposed to maintaining these functions in the proposed project? This is social injustice based upon economical status of individuals that now use these existing facilities.

Most of the current businesses that now exist in the proposed project area will be eliminated and replaced with higher cost rent replacements structures that most of the existing business tenants will not be able to afford. This will change the flavor of the area from a quaint fun area for locals to go and visit to a more affluent patronage destination. The current clientele will not be able to afford the cost of food at the new restaurants Again this is social injustice to the economically challenged population.

Response to Comment PC375-1

The project objectives include providing a distinctive high quality mixed-use environment (with water and landside amenities) 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 for the Sportfishing Pier, please refer to the Master Response #5: Sportfishing Pier, Polly’s and Sportfishing.

As for the proposed development, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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 PC375-2

Some other specific reasons for my concern are:

1. Construction concerns:
 - a. Noise during construction (disturbing residents of “the Village Condominiums and The Ocean Club Apartments”
 - b. Air pollution from dust and vehicle engine exhausts will impact everyone’s health in the immediate area.
 - c. Traffic congestion caused by the large number of construction vehicles performing construction tasks within the project area and adjacent cities.

Response to Comment PC375-2

The impact of the proposed project on the adjacent land uses during construction on noise (Section 3.10), air quality (Section 3.2), and traffic (Section 3.13) is detailed in the Draft EIR, which is summarized in the Executive Summary to the Draft EIR. 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 passenger car equivalent [PCE] vehicle trips in comparison to the 9,684 existing vehicle trips from current operations). As discussed in Section 3.10, the proposed project includes a number of construction noise mitigation measures, including (1) use of equipment mufflers, (2) stationary construction equipment placement limits, (3) equipment staging limits to avoid construction noise, (4) use of electric tools, and (5) installation of sound barriers. 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 PC375-3

2. Completed project:
 - d. Same as above except item c.
 - e. Visible natural vistas now existing will be obstructed by new buildings and structures.
 - f. The elimination of existing restaurants and shops on the International Walkway and adjacent areas like Sambas, R-10, Najas, Corner Pub, Polly's, Quality Seafood, Joes Crab Shack and many more.
 - g. The shared bike/pedestrian path will promote accident between these two classes of transportation.
 - h. The draw bridge will at some point cause accidents with boats and people when they raise and lower. This feature should completely eliminated from the project for safety reasons.
 - i. The proposed New Seaside Lagoon for swimmers and waders, Sup and Kayak riders, and Small Boats launched at the Boat Ramp areas will conflict with each other and result in bodily injuries to people doing these all of these activities.
 - j. Sea animals will be able to haul-out in the Seaside Lagoon and Boat Launch areas that would be open to the ocean. Resulting in safety concern for people doing activities in these areas and the sea animals themselves.

Response to Comment PC375-3

Please see Response to Comment PC375-2. Please refer to Master Responses #9: Views and Scale of Development, #3: Economic Vitality and Compatibility of Businesses at the Project Site, and #4: Modifications to the Seaside Lagoon for response to comment b, c, f, and g respectively. Please see Response to Comment PC323-97 regarding bicycle safety.

As for the safety of the new pedestrian/bicycle bridge, the commenter does not provide any reasons or examples as why they think that at some point the bridge will cause accidents with boats and people when they raise and lower it. The bridge proposed is not unique in its design or function. Bridges such as the one proposed are found throughout the world and operate safely. The operation of the proposed bridge would include a schedule of operational assumptions, including details on when at regularly scheduled intervals the bridge would be opened to maintain waterway access and navigation of the marina, which would be posted and become part of the new lease requirements associated with the redeveloped marina. As described in Section 3.12 of the Draft EIR, the pedestrian bridge would be subject to approval of a Coast Guard Bridge Permit, which would include conditions relating to the construction, maintenance, and operation of these bridges in the interest of public navigation. Staff trained to operate the bridge would be on-site at all times; therefore, with compliance with Coast Guard requirements, as well as staff trained to operate the bridge, the bridge would operate safely. Please see Response to Comment PC323-96 for additional discussion of the proposed bridge.

The commenter has provided general opinions and 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 PC375-4

This EIR leaves too many options open and available to choose from. These options need to be solidified in order to be able to completely address the actual impacts that they create. The scope of the EIR should focus on a fewer alternatives that could be adequately addressed. Please write a new focused EIR that can be addresses by all interested parties.

Response to Comment PC375-4

Please also see Response to Comment PC323-29 and PC323-33 for discussion of the project description and the

number of alternatives. The commenter has provided general opinions and 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. PC376**MIKE & SUE MORGAN**

Comment PC376-1

Below are our comments on the DEIR. I am also attaching them in PDF format in case that is easier. If you have any problem with either just let me know. Thanks!

Comments on DEIR for CenterCal Project**1. General Comments:**

The overall scale of the CenterCal Project is MUCH too dense for the area it will inhabit. This will have significant negative environmental impacts on traffic to the harbor, the harbor itself and its ability to properly function as a harbor. We have lived aboard our boat in Port Royal Marina for 35 years so we are very familiar with the harbor in general, and particularly the area we live in which is directly across the street from the Redondo Beach Marina parking lot (Ruby's and Captain Kidd's location) and the Seaside Lagoon. As such, we are focusing our comments on the Draft EIR to this area of the project.

Response to Comment PC376-1

As detailed in Section 3.13, Traffic and Transportation and Appendix L1 of the Draft EIR, traffic impacts were found to be less than significant with implementation of mitigation (not significant). As also outlined in Draft EIR Table 3.13-8, the harbor has operated safely with a much greater levels of boat traffic. (See also Section 3.13.2.4.3 for discussion of the harbor's channel capacity.) With implementation of the proposed project, the harbor would still function as such.

Comment PC376-2**2. Specific Areas of Concern: (Section 3.4.1.4 & 3.13.4.3 of the DEIR)****A. Proposed three-story four-level parking structure at the corner of Beryl/Portofino Way & Harbor Drive**

In spite of what the DEIR reports states, the intersection of Beryl/Portofino Way & Harbor Drive is already very busy. The east/west-bound lanes are frequently backed up bumper to bumper for multiple blocks on weekends and whenever there is an event taking place at the conference center of the Portofino Hotel (which is very frequently). The traffic situation in this area has worsened with the addition of the new bike path. We believe placing a large parking structure at this intersection will cause traffic to become even worse since entering a parking structure requires slower speeds and more maneuvering than driving into an open parking lot. The parking structure will also eliminate the current, necessary parking for boat trailers, recreational vehicles and busses. It will also pose a serious problem for kayakers and paddle boarders which, according to the CenterCal Project, will also launch from this area of the harbor. If they are able to get their vehicle and watercraft into the parking structure, they will then be faced with the difficulty of negotiating elevators or stairwells to get their watercraft to the launching area. Traffic and parking aside, the parking structure will also destroy the substantial existing views of the Seaside Lagoon, outer harbor and the ocean beyond, for everything north and/or east of the structure. The current open

parking lot serves the necessary uses of the harbor far better and without the negative impacts on traffic and views.

Response to Comment PC376-2

Refer to the detailed traffic analysis in Section 3.13 and Appendix L1 (also refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project). The commenter also asserts that existing traffic conditions “already very busy.” Individuals perceptions of traffic can be subjective, however, the Draft EIR traffic analysis is based upon objective traffic counts taken in 2013 and 2014, as discussed in Section 3.13.2.3.1 of the Draft EIR. As discussed in Response to Comment PC358-1, the new bicycle path and the associated decrease in vehicular roadway capacity was considered in the traffic analysis as well as the vehicular entry points for the proposed project. The commenter also implies that the traffic analysis should be based upon peaking characteristics of individual commercial facilities (e.g., Portofino Hotel). The Draft EIR made reasonable assumptions and employed appropriate transportation methodology, and focused upon the AM and PM peak hours for the area as a whole. This level of specificity requested by the commenter is not required under CEQA. (See *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.”].)

Please also refer to Response to Comment PC137-2 and Master Response #7: Waterfront Parking regarding parking on the site, including SUP parking. Please refer to Master Response #9: Views and Scale of Development for information of views. 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 PC376-3

B. Seaside Lagoon (Section 3.8.2 & 3.12.4.3.1 of the DEIR)

Opening the Seaside Lagoon to the harbor, as the current CenterCal Project proposes, also opens it to much more pollution, erosion, and the most difficult to mitigate in any way, occupation by the local sea lion population. Whether the new boat launch is located next to the lagoon or not, it will be subjected to many more pollutants from the boat traffic coming in and out of the harbor. On top of that you have the bird and mammal waste washing ashore from the breakwater and the seal barge in the outer harbor. During winter months or periods of high surf, erosion of the “lagoon” (which will be reduced to just a small indentation of beach) will be a constant problem and will create new maintenance issues and expenses. And then there’s the problem with the sea lions. Although their numbers fluctuate, they are an ongoing problem and nuisance to boaters and fishermen in not just King Harbor, but harbors and coves up and down the coastline. If the Lagoon is opened to the harbor, they will be able to haul out on the beach. We know from first-hand experience that they can be extremely noisy, smelly and very aggressive. As a protected species they cannot be harassed, which means it will be extremely difficult to deter them from taking over the area. They will render the Seaside Lagoon unusable, and with their close proximity to the proposed shopping and dining it is pretty easy to conclude that they will not do anything to enhance those activities.

Response to Comment PC376-3

Please refer to Master Response #4: Modifications to Seaside Lagoon for information on the improvements to the lagoon. Please also see Response to Comment PC534-7 for discussion of bird waste. For discussion of erosion at Seaside Lagoon, please see Draft EIR page 3.8-69. 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 PC376-4

C. Boat Launch Ramp Locations (Section 3.12.4.3.1 of the DEIR)

There is no ideal location for a public boat launch ramp, however, one is required. The two most discussed options currently are the Joe's Crabshack location, or Mole A where King Harbor Yacht Club is located. The Joe's Crabshack location will create serious traffic and parking problems, particularly if the existing surface parking is replaced by a parking structure. The current plan does not provide adequate surface parking for vehicles towing a trailered boat, and they can not park in a parking structure. Portofino Way will need to be widened to two lanes in each direction if it is to handle traffic to the launch ramp AND the Portofino Hotel. This location will also create serious congestion in the harbor waters since it is just north of the turning basin for sailboats and according to the CenterCal plan, will also be a launching area for kayaks and paddleboards. You could also have swimmers venturing out into this area from the "open to the harbor" Seaside Lagoon.

The Mole A King Harbor Yacht Club location, while in an area less impacted by water traffic, is subject to waves coming over the breakwall. It is also extremely shallow at low tide. It would be unusable much more frequently than other site options and would need constant dredging to keep it operational even in moderate weather and tide conditions. Also, the road going back to that location is not wide enough to handle vehicles towing trailered boats in both directions. It would need to be widened which would require extensive modifications to that end of the harbor and most likely result in a loss of boat slips to provide the space.

Since CenterCal is not paying for the boat launch ramp, the city and tax payers will be burdened with the costs for this project. Ironically, there is one location that will have the least impact on the environment, traffic, safety, and construction and maintenance costs, which is being overlooked. Mole B already has an adequate road in place, surface parking and vacant land. It is much more protected from high surf than either the Joe's Crabshack or King Harbor Yacht Club sites. The Harbor Patrol office is right there to monitor the safety of its operation. The area is a landfill which could be modified so that the launch ramp is either set back or at an angle where boats do not launch directly into boat traffic entering and leaving the basin. It's the area that makes the most logical sense and should be put into consideration.

Response to Comment PC376-4

Please refer to Chapter 4, Analysis of Alternative (Alternative 8) of the Draft EIR and Master Response #8: Boat Ramp in King Harbor for information on the boat ramp locations. Please also see Master Response #4: Modifications to Seaside Lagoon for discussion of the interaction between small watercraft and boats. Please also see Response to Comment PC323-85 for discussion of dredging. See Response to Comment PC346-1 regarding the commenter's statements about usage of Portofino Way. Regarding a boat ramp at Mole B, please refer to Master Response #8 and Section 1.3.2 of Chapter 1, Introduction within this Final EIR for a discussion on the Staff Recommended Alternative, which includes a discussion of Mole B. The commenter opinions and 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 PC376-5

3. Conclusion:

There are too many aspects of the CenterCal Project that do not work in a harbor setting. They negatively impact the ability of the harbor to function as a harbor, and that should be the top priority when considering a revitalization of the area. A proper revitalization plan should focus first on making King Harbor the best small craft harbor there is. Period. Once that priority is met the addition of other entertainment venues in the harbor can be considered. We don't know anyone who objects to more dining options and unique retail stores. We used to have them and we will welcome them back. A movie theater on the other hand, seems a huge waste of

space. One can watch a movie anywhere. One can not watch the sun setting over the ocean anywhere. Please, let's make King Harbor a great harbor, but keep it a harbor.

Response to Comment PC376-5

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." The commenter opinions and 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. PC377

ALISON CANETTY

Comment PC377-1

Hi any help I am against rebuilding I think it should stay the way it is.

Response to Comment PC377-1

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. PC378

ALAN

Comment PC378-1

Im a resident and property owner in Redondo Beach. I 100% support this project as is.

Response to Comment PC378-1

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. PC379

WAYNE CRAIG HOMES

Comment PC379-1

I want to address these specific items as contained in the DEIR identified as having **No Negative** impact

- **Traffic: 12,550 additional car trips per day**

The number is very low considering the methodology is flawed so the number of cars is higher. The number also fails to take in consideration the additional traffic from the Shade Hotel under construction and the recent modifications to Harbor Drive for a new bike lane. Both of these should have been considered and were not.

Response to Comment PC379-1

The commenter makes an assertion without providing any data or specifics. The commenter is incorrect, as the Draft EIR did include the additional traffic from the Shade Hotel, as well as Legado Redondo, Kensington Assisted Living Facility, the Seabreeze project, and a cumulative growth rate of 0.36 percent per year, were also incorporated into the traffic volumes to characterize Cumulative (2019) Conditions (refer to Section 3.13 and

Appendix L1 for the cumulative projects added to the analysis). In addition, the existing Harbor Gateway bicycle path modifications were assumed in the traffic analysis; please see Response to Comment PC358-1.

Comment PC379-2

- **Parking: 140% more development, 8% more parking**

This number seems to be counterintuitive to a 552,000 foot development which is so large it would actually need more parking. The projected parking use in the DEIR is 2567 spaces and the project has only 2363 which is short at least 200 spaces. The overflow will go to the surrounding residential neighborhood and create more congestion.

Response to Comment PC379-2

Please refer to Master Response #7: Waterfront Parking.

Comment PC379-3

- **Views: Structures block 80% of views along southern Harbor Drive, some up to 45' tall**

This will have a negative impact on the approximately 601 condominiums which currently border the area. Assuming a mild 7% drop in value for the homeowner will add up to over \$40 Million dollars in loss in property value and commensurate annual city tax revenue. Who will reimburse the homeowners for this loss?

Response to Comment PC379-3

Although not an environmental issue under CEQA, there is no proof that the project would negatively affect property values. Please refer to Master Response #9: Views and Scale of Development.

Comment PC379-4

- **Recreational Ocean Access: 67 trailer spots down to 20**

Reducing parking clearly reduces harbor access for boaters and kayakers, swimmers, stand up paddle boarders. This is effectively turning the Harbor into a mall so this will have a negative impact from it's original purpose as a harbor.

Response to Comment PC379-4

Please refer to Master Response #7: Waterfront Parking and Master Response #8: Boat Ramp in King Harbor.

Comment PC379-5

- **Water Quality: Opening Seaside Lagoon to Harbor Water**

Currently 25% of 2014 water measurements exceed E-coli and fecal standards. There is no proof an open Seaside Lagoon 1/3 the current size will not create health hazards for people swimming in this open.

Response to Comment PC379-5

Please refer to Section 3.8 of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon regarding lagoon water quality.

Comment PC379-6

- **Access Ramp – Safety Issues**

The DEIR plan has power boats, kayakers, swimmers, stand up paddle boarders, using the same narrow area to access the harbor. The DEIR states these safety issues will be outlined and detailed in the pages that follow but there are NONE.

Response to Comment PC379-6

The Draft EIR details safety in Section 3.13, Traffic and Transportation, Impact TRA-3. Please also refer to Master Response #4: Modifications to the Seaside Lagoon.

Comment PC379-7

- **Water Features – Bellagio Hotel Like Fountain**

While not identified in the DEIR the fake NY Time article published 1/12/16 stated the developer plans to install an intelligent fountain, similar to the one at the Bellagio Hotel in Las Vegas, that offers performances. This was not in any plan so this needs to be removed from consideration.

Response to Comment PC379-7

The commenter's opinion is noted. Please see Response to Comment PC323-29 for discussion of the level of detail necessary for the project description. The final configuration of the project is not final until approved by the City's decision-making body.

Comment PC379-8

- **Financial Solvency– 700 Seat Theater and Boutique Hotels as Mall Anchors**

The use of these two businesses as draw for shoppers does not make sense. Currently 85% of people watch movies at home rather than a theater and number is growing each year. The addition of a boutique hotel makes even less sense as another hotel is almost completed (Shade) which will take away any potential clientele. At best the financial stability of this project is risky.

Response to Comment PC379-8

As for the projects economic vitality, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

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

COMMENT LETTER NO. PC380**RAY HEDGE**

Comment PC380-1

I would like to register my opposition to the size and scope of the proposed CenterCal project. I have been coming to Redondo since 1978 and have lived in Seascape One for over 27 years. I am obviously prejudice when it comes to lost views, increased traffic, noise, and crime.

The harbor has been neglected by the city for years and desperately needs some renovation but to take away the charm of our waterfront with this massive project is almost criminal. I am sure there is nothing we can do about it since the city coerced the voters to pass Measure B. This is an environmental disaster for the waterfront.

I am particularly opposed to the road connection along the waterfront and the blocking of views with the massive construction on the North end.

As I understand it, the views from Czuleger Park were supposed to be protected in any new development. I have attached a photo from the park and would like to know how the views are to be protected when the plans call for a large, very tall structure, Market Hall, along with other buildings directly in the views you see in the photo. I would like to see an elevation view projected on this photo.

There could be so much done to improve the waterfront and keep its charm, but our city has chosen to pass the power to a developer. What a shame.

[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 PC380-1

As discussed in Master Response #1: AES Power Plant Site, Measure B was not approved by the voters and addresses property outside of the project area. The zoning for the project site was approved by the City Council, the Redondo Beach electorate (Measure G), and the California Coastal Commission. Please also note that three of the seven project alternatives (Alternatives 1, 2, and 5) which do not include the Pacific Avenue Reconnection; please see Draft EIR Chapter 4, Analysis of Alternatives. Regarding views refer to Section 3.1 of the Draft EIR and Master Response #9: Views and Scale of Development. Regarding parking, refer to Section 3.13 of the Draft EIR and Master Response #7: Waterfront 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. PC381

DIEGO MENDOZA

Comment PC381-1

My name is Diego Mendoza and I'm writing you to express my deep desire to keep Redondo Sportfishing. I've been driving from Burbank to Redondo for several weekends because I've found that it's the friendliest and most well-ran sportfishing establishment in the Los Angeles area. It's a great experience every time I visit the Redondo community. From having breakfast at Polly's on the Pier to boarding the Redondo Special or Indian; it's all been a special experience for me. There's something unique about how polite and professional every employee treats their customers at Redondo Beach Sportfishing. Please, please, please do all that you can to prevent taking this experience from myself and the several other regulars at Redondo Sportfishing.

Response to Comment PC381-1

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. PC382**SEAN MCMINIMY**

Comment PC382-1

Please keep sportfishing in Redondo Beach. I was born in the city and have fished the landing for many years. I have been taking my kids for a few years now and have always enjoyed the staff at the landing as well as the crew on the Redondo Special. It would be a shame to let such a family oriented thing as fishing leave. Please consider the future generations of families that would be able to enjoy time on the water together. Thank you for your time.

Response to Comment PC382-1

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. PC383**JOAN RILEY**

Comment PC383-1

I've listed several concerns I have with the findings presented in the DEI. I have critiqued as well as offered suggestions to help reduce the severity of impacts on the environment and community by the proposed project.

Concerns:

1) The DEIR inadequately measured the impact of additional sound on residents and wildlife. Noise has a significant and unavoidable impact on the local environment, wildlife and the economy.

By ignoring the "acoustics of the existing environment," the findings are inaccurate and misrepresent the true impact more sound would create by the proposed development.

-The Topography of the environment, both artificial and natural, can greatly exaggerate and distort sound created near the Harbor. Sound is carried over the ocean; broadcast onto the adjacent hillside neighborhood which is composed of dense, angled, and multistoried buildings. This western facing, sloped collection of buildings works to distort and echo sound within and through out the neighborhood. Composed of hundreds of households, the community is occupied by working professionals, and young families, and the retired. An elderly care facility is also part of the neighborhood.

-**The larger neighborhood**, extending up and over a mile from the harbor to Prospect Ave., is **shaped as a natural amphitheater** whereby sounds can be projected at remarkably loud levels. Sea lions are clearly heard at night.

The proposed project will produce sound which will adversely impact the quantity and quality of what is "acceptable noise."

From the Office of Noise Abatement and Control, E.P.A., United States, *"Noise can cause regular and predictable stress in the human body. People do not get used to noise. The body continues to react even during sleep. Noise affects the quantity and quality of sleep. The elderly and sick are more sensitive disruptive noise."*

Suggestions for reducing the significant impact of noise:

a) This proposed project requires specialized expertise to evaluate the true impact of “noise” on this unique area adjacent to the waterfront.

- b) Define acceptable noise within and outside the current waterfront neighborhood.
- c) The project needs to be reduced in size and density with greater undeveloped spaces. Buildings need to be organized, oriented, and shaped to reduce noise. Building vents, windows, doors, outdoors and inside seating areas need to be set to minimize noise impacts on residents. Sound barriers cannot further block views.
- d) Eliminate Pacific Ave. **Many homes are extremely close to the proposed road.** Residents will be unfairly impacted by noise and emissions.
- e) Establish a method to monitor, report and immediately resolve excessive noise abuses.

Response to Comment PC383-1

The noise impacts analysis of the proposed project was completed in accordance with good professional practice utilizing a technical approach, analysis methodology, assumptions, and thresholds of significance that are widely accepted for environmental impact reports. Please refer to a list of the technical experts in Chapter 7, List of Preparers of the Draft EIR, which has been updated in Chapter 3, Modifications to the Draft EIR within this Final EIR, to include the technical expertise of the consultants. For noise, CDM Smith staff, Mr. Anthony Skidmore (with over 35 years of CEQA and noise expertise) and Ms. Asami Tanimoto (with over eight years of experience in CEQA, air quality and noise modeling), were the primary technical staff that prepared the noise analysis in Section 3.10 of the Draft EIR.

The analysis completed for the project does not ignore the “acoustics of the existing environment” as asserted by the commenter, but rather includes ambient noise measurements at 14 locations representative of existing sensitive noise receptors distributed throughout the community around the project site, as presented in Section 3.10.2.2 of the Draft EIR. Those noise measurements account for existing topography and structural elements, both natural and man-made, and also account for the variety of existing noise sources, both natural and those associated with human activity occurring within a very urbanized setting.

Although the ground elevation east of the project site generally increases with distance, the resultant acoustical setting is not a “natural amphitheater” as claimed by the commenter. The subject area is highly developed with a vast array of structures, landform alterations, landscaping, and other features that obscure the travel path of sound emanating from the project site. Of particular note is the fact that most of the eastern edge of the project site is bordered by large multi-story structures including, but not limited to, 4- to 6-story condominium complexes and the 6-story Crowne Plaza complex, which, if anything, would partially shield areas farther to the east from noise emanating from the project site. The fact that sea lions can be heard at night, as noted by the commenter, is not indicative of the area being a “natural amphitheater, but rather reflects the fact that sea lions are known for their very loud and unique bark, which can occur frequently both day and night⁷³ and would be particularly noticeable at night when ambient noise levels are relatively low.

It should also be noted that while the areas to the north, east, and south of the project site are highly urbanized with a variety of existing structures that can act as noise barriers, the construction noise impacts analysis completed for the proposed project did not take into account the noise attenuating effects of existing topography and structures nearby; therefore, the impact analysis conclusion are considered to be conservative (i.e., project-related construction noise levels would be lower than projected when taking into account any intervening topography or structures). The operational impacts analysis pertaining to roadway noise levels along the Pacific

⁷³ <http://www.marinemammalcenter.org/education/marine-mammal-information/pinnipeds/california-sea-lion/>

Avenue Reconnection did, however, account for the adjacent nearby topography and retaining wall.

Section 3.10.2.1 of the Draft EIR describes and acknowledges the effects of noise on people. Section 3.10.3 of the Draft EIR describes the regulatory framework applicable to noise, which along with the thresholds of significance presented in Section 3.10.4.2, serves to characterize acceptable noise levels for the purpose of assessing project-related noise impacts. Impacts associated with noise and wildlife are addressed in Draft EIR Section 3.3. Impacts associated with air quality are discussed in Draft EIR Section 3.2.

Regarding the suggestion that the project be reduced in size and density, with greater undeveloped spaces, Chapter 4 of the Draft EIR provides an analysis of alternatives to the proposed project, including Alternative 7, which is a reduced density alternative.

Regarding the suggestion that the proposed Pacific Avenue Reconnection be eliminated from the project, Alternative 5 presented in Chapter 4 of the Draft EIR provides for such a scenario. As described in the evaluation of Impact NOI-3 in Section 3.10.4.3 of the Draft EIR, traffic along the reconnected segment of Pacific Avenue would not result in a significant noise impact to noise sensitive uses adjacent to the subject segment, but would result in a significant increase in existing ambient noise levels along Torrance Avenue between the project site and Catalina Avenue. While that increase in ambient noise levels would be significant, the resultant Community Noise Equivalent Level (CNEL) 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). Notwithstanding the above, the commenter's suggestion that the Pacific Avenue Reconnection be eliminated from the proposed project will be provided to decision-makers for consideration. The commenter's suggestion to modify building vents, windows, doors, outdoors, and inside seating areas, would not reduce or avoid the significant impact associated with roadway noise. Please also see Draft EIR page 3.10-26, for modifications to the existing loading zones to reduce existing noise sources and improve noise conditions. The City has also included Condition of Approval (COA) NOI-1: which provides for buffers and noise shielding into parking areas and structures adjacent to noise sensitive uses.

Regarding the suggestion to establish a method to monitor, report, and immediately resolve excessive noise abuses, noise occurring within the city, including at and around the project site, that exceeds the levels set forth in the City of Redondo Beach Municipal Code (RBMC), under Chapter 24 of Title 4, Noise Regulation (effective August 11, 1976), can be reported to, and be addressed by, the Redondo Beach Police Department.

Comment PC383-2

2) The consequences of Pacific Ave cannot be mitigated. It is a public safety and pollution hazard.

Traffic congestion, noise, and vehicle emissions are unhealthful and dangerous to the visitors and residents. Adding a road so close to the ocean is inconsistent with pedestrian recreation by the sea. Suggestions: **Restrict Pacific Ave to daytime hours and close completely on weekends.**

Response to Comment PC383-2

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. With the exception of operational-related traffic noise impacts 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, no other significant impacts were found to be associated with the reconnection. The commenter's 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 Response to Comment PC317-

3.

Comment PC383-3

3) Diminished ocean views from Harbor Blvd! Most of the pedestrian water views will be sacrificed for the proposed plan.

In addition, views of the Palos Verdes Peninsula, will no longer be enjoyed from Harbor Blvd. The proposed “Market Place” building at 2+ stories is too high and blocks ocean views from part of Czuleger Park.

Other previously accessible views of the ocean from the waterfront will be blocked by the project. Visitors will have to walk around and in front of the project to see their “public access “ view of the water.

Suggestions: **Don’t allow standing views of the ocean to be blocked by the proposed project. Reduce heights of building, and create more open vista space within the project.**

Response to Comment PC383-3

Please refer to Section 3.1 of the Draft EIR and Master Response #9: Views and Sale of Development.

Comment PC383-4

4) Impact on Czuleger Park is not identified. Czuleger Park is the central green pathway and largest open space next to the proposed project. The DEIR does not address “over-use” of the park by hundreds of visitors passing through to the proposed project. The increase in park use will affect the amount of noise, garbage, crowding etc., that will result in **loss of use of a community park. .**

Suggestions: Physically restrict access to Czuleger park at sundown and monitor adherence. Add a different, primary pedestrian entrance to the project.

Response to Comment PC383-4

Impacts to Czuleger Park is detailed throughout the Draft EIR. Specifically, aesthetics was addressed in Section 3.1, air quality impacts on the adjacent area in Section 3.2, impacts on potential cultural resources (Section 3.4), and recreation (Section 3.12), to name a few. As outlined under Impacts REC-1, the proposed project is not anticipated to result in substantial physical deterioration of the existing parks, including Czuleger Park. As outlined in Figure 2-20, the proposed project increases the number of pedestrian entry points to the project site. The project site currently contains existing development, and is accessible by pedestrian pathway through Czuleger Park. While the project will increase the amount of development on the project site, the number of residents east of the project site who may choose to walk to the project are not anticipated to increase. The project site has a number of different entrances, with the main entrances being at Harbor Drive/Portofino Way, and from Torrance Circle. Thus, the majority of new visitors are more likely to access the site from the north or the south. Visitors arriving by vehicle are expected to primarily use on-site parking, most of which is in the structures at the northern and southern corners of the site. Pedestrians and bicyclists would most frequently be expected to enter the site from the north or south (using the cycle track, sidewalk on Harbor Drive and Torrance Circle, and the Strand) as opposed to entering through Czuleger Park. See Figures 2-19 and 2-20 in Chapter 2, Project Description of the Draft EIR, for figures showing the various bicycle and

pedestrian routes into the project site. Additionally, as shown on Figure 2-20, there are various bus stops in the vicinity of the project site. While several of the bus stops are located near Czuleger Park on Catalina Avenue, there are other stops closer to the project site on Torrance Circle and Harbor Drive and Beryl Street that would provide visitors with various options for convenient access to the project site.

Visitors that do access the site from Czuleger Park are expected to primarily use the paved pathway that connect Catalina Avenue to the project site, which could accommodate an increase in use without negatively affecting the park. Regarding an increase in use of the park, Czuleger Park is largely a passive use area with seating areas and pathways that affords access to and views of the harbor, and it is currently one of the most underused parks in the City. The use of the turf area is generally limited given the sloped topography and use of this area is not expected to substantially increase with implementation of the proposed project. As discussed in Section 3.12, the proposed project includes new opportunities for recreational uses on-site, including the modified Seaside Lagoon and new open space, and it is expected that new visitors coming to the site would generally patronize those areas for recreational purposes, as opposed to Czuleger Park. Furthermore, the City has not had a history of refuse problems at Czuleger Park, and it would continue to maintain the park, including providing trash and maintenance service.

Comment PC383-5

5) Improvement to Seaside Lagoon. Replace the natural lagoon with modern salt-water pools that are designed for both families and the elderly. We have a rapidly aging city with no facilities for seniors to recreate and exercise in therapeutic warm water. **The pools can be open year round to maximize participation and success.**

Response to Comment PC383-5

Please refer to Section 3.8 of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. The comment also suggests installation of a pool. A Draft EIR provided a reasonable range of alternatives in Section 4, 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.) Your comments 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. PC384

CAROLYN CARTER

Comment PC384-1

Please try to **renovate**, rather than redesign the iconic restaurant Old Tonys!

Thank you for your time.

Response to Comment PC384-1

Refer to Response to Comment PC312-1. 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. PC385**JUDY FOLSOI**

Comment PC385-1

Please save Polly's a true treasure.

Response to Comment PC385-1

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. PC386**YVONNE VICK**

Comment PC386-1

I want to thank the City of Redondo Beach Staff for orchestrating such a complete and complicated analysis on the DEIR. I think there are many negative comments creating a "smoke screen" effect against the project. I don't think the boat ramp placement, "safety in relation to storm and wave surges", or "temporary noise level increase impacting resale values" merit putting this project on hold any longer.

Doing nothing is definitely not an option. We will have to replace the parking structure and pier structure modifications regardless. Issuing bonds is not an option, as we the citizens of the city will be stuck with the bill.

I am in full support of proceeding with the project and making slight modifications based on citizen input.

Response to Comment PC386-1

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. PC387**YVONNE VICK**

Comment PC387-1

I am in support of opening the seaside lagoon to the sea. I believe that would be the best alternative to the present situation and cost of recirculating the water in the lagoon.

I support the project to move ahead.

Response to Comment PC387-1

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. PC388**DOUG RODRIGUEZ**

Comment PC388-1

I am looking forward to revitalization of our waterfront with this public/private partnership between the City of Redondo Beach and CenterCal. Our waterfront is in need of major infrastructure repairs and partnering with a

private partner seems to be the best way to do this without asking the taxpayers to foot the bill.

I would like to see some attention given on finding the best solution for items listed below:

A drop-off area for the hand launch vessels (SUPs/Kayaks) which is closer to the parking lots. How can a single patron drop off their equipment, keep it secure while parking their car?

Explore adding sufficient trailer parking near the boat ramp to ensure that all who want to launch boats and park their trailers are able to do so.

Has a feasibility study been done to support a 700 seat high-end movie theater? While I realize there was a movie theater in Redondo's history, is this the best use of space and parking? Are there contingency plans for the space if the theater is not successful?

Is the proposed location for the parking structure the best site for this?

Are there any considerations to have a trolley/shuttle that could shuttle between parking structures and the site, possibly electric powered?

Is there any consideration to rebuild the pier where Polly's is currently located?

Is alternative energy generation being incorporated into the plans? (Solar, wind, etc.)

I appreciate all the great comments and hard work that everyone is putting forth for this project. I look forward to being able to enjoy this in the near future.

Response to Comment PC388-1

Please refer to Master Response #7: Waterfront Parking regarding SUP parking and the parking structure proposed in the northern portion of the project site. Also refer to Master Response #8: Boat Ramp in King Harbor regarding trailer parking. 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.

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on the pier.

As discussed in Section 3.6 of the Draft EIR, the proposed project would be consistent with Title 24 for energy and water conservation practices. Additionally, the proposed project would be recycling building materials on-site where feasible and transferring to a sorting facility for recycling when the material cannot be used on-site, therefore increasing recycling conservation. While the goals of the Sustainable Development Strategic Plan are generally not applicable to a project-level development such as the proposed project, the design and construction practices of the proposed project would nonetheless further the City's overall sustainability goals. In addition, detailed engineering and design plans have not yet been submitted for City review and approval, so specific Title 24 project elements are not known in detail.

As also noted on Draft EIR page 3.6-13 "the CO2 intensity factors under the proposed project's 2020 buildout scenario were adjusted to account for the achievement of a 19.9 percent renewable energy generation (including solar, wind, geothermal, etc.) by SCE in 2014. At this juncture these assumptions are considered highly

conservative; SCE's renewable energy procurement for 2014 was updated to 23.5 percent, and SCE is currently under procurement contracts to provide 36.9 percent of their energy from renewable resources by 2020. As noted on Draft EIR page 3.6-14 "with the continued increase in renewable energy generation in SCE's energy portfolio, the energy intensity of electrical generation will continue to decrease, resulting in less indirect emissions from energy generation." After the year 2020, SCE is under a state mandate to provide 50 percent of its electricity from renewable sources by the year 2030. (Senate Bill 350 [2015].)

COMMENT LETTER NO. PC389**MICHAEL KIKKAWA**

Comment PC389-1

Hello I've been fishing at Redondo beach Sportfishing with captain David (midnight) aboard the Indian for a while. He has been running the boat for quite sometime and puts a lot of work in day in and day out. I hope the landing stays open for the future and especially for the people that have been working there. Also the location of Redondo Sportfishing is right next to rocky point ,pv, and sm bay. Not too many people fish the area that captain David has provided with his time there. Thanks hope to keep Redondo there for the future of fishing on the westcoast.

Response to Comment PC389-1

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. PC390**KELLIE BROWN**

Comment PC390-1

My it go on record that I am opposed to renovating Old Tony's. I LOVE Old Tony's! I know a lot of people that love Old Tony's. In fact, it is packed every time I visit. People love the place because it is unique and a step back in time to another era. I am afraid a renovation would take away all of it's charm and ambiance. If that were the case, I would not return. I know I am not alone.

Please urge the owners and developers to preserve this historic place.

Response to Comment PC390-1

Refer to Response to Comment PC312-1. 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. PC391**MARY E. PAGONE**

Comment PC391-1

I am writing today in hopes that you will consider the protection and reverence for (Old) Tony's on the Pier. Born and raised in Southern California, Tony's was and is still one of those places that I, my family and friends consider a precious vintage gem. Over the years, we Angeleno's have had to watch as the wrecking ball or tasteless, antiseptic renovation that sucks the soul out of places, destroy more and more Southern California landmarks.

When will developers consider preservation, rather than destruction, as the answer to keep neighborhoods unique?

There is a large contingency of residence who believe in conservancy and are seeing flourishing results

when these landmarks are saved. Downtown Los Angeles's theater section is a great example of preservation at work.

Please don't let Tony's become another Formosa Cafe in Hollywood, a prime example of a historic landmark destroyed by development and is now deemed a financial disaster. Please see link:

[Everyone hates the new Formosa Cafe remodel](#)

[Article downloaded and included in the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC391-1

Refer to Response to Comment PC312-1. 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. PC392

JYUN TOSA

Comment PC392-1

Keep it alive..its a part american culture..these sport boats need places like redondo and other great landings to exist.thanks.it will not be kings harbor without fishing.

Response to Comment PC392-1

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. PC393

PAT SMITH

Comment PC393-1

Please don't let this icon restaurant go away!!! This place is loved!! Good food good drinks many memories! Nothing like Tony's!!

Response to Comment PC393-1

Refer to Response to Comment PC312-1. 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. PC394

DAN ELDER

Comment PC394-1

I wanted to again voice my support for the proposed redevelopment of our waterfront. I'm very interested in an alternative boat ramp location though as the proposed site next to Seaside Lagoon would create significant safety hazards and increase pollution at an already heavily used beach. I strongly believe powered watercraft should be kept as far away as possible from unpowered recreational water users. I feel that rebuilding Sportfishing Pier (instead of just tearing it down) would also better serve the fishing community and reduce demand on Horseshoe Pier. I haven't evaluated the financial obligation to the city versus CenterCal but I would also like to make sure that the final agreement protects the city (and residents) from as much financial risk as

possible while maximizing our potential financial gain. I wasn't able to determine what long term maintenance or redevelopment would look like and who would be responsible for the cost but making sure this is a sustainable project not just now but in the future should also be a priority.

Response to Comment PC394-1

Please refer to Section 3.13 of the Draft EIR for boater safety and the Seaside Lagoon, as well as Master Response #4: Modifications to the Seaside Lagoon. In addition, please refer to Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on the condition of the Sportfishing Pier and buildings. 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. PC395

NIK MELLER

Comment PC395-1

My 2 cents on the Redondo Beach Sportfishing Pier.

I'm headed after this email to pick up my 6-year-old son Luke to catch the last hours of light to do some fishing off the RB Pier.

You may remember Luke from: http://tbrnews.com/news/redondo-beach-boy-catches-a-fish-as-big-as-him/article_acd26c30-8d74-11e5-b676-43659c585b5e.html

You will also see his picture on the wall there and several other fishing stores in the South Bay. I included some pictures of him doing what he loves to do.

He and countless other children got started on that Pier and spend lots of time with the dads and moms there. Plus he has made so many friends and learned so much from all the others that go there.

It's a landmark for many and a place where kids have lots of fun and puts families in a super happy place. Whatever you decide, please make sure you don't take that away and make sure you include a place where they and the next generation can continue to fish like this.

Maybe even maintain a portion of the Pier to mimic the old Pier. Its priceless!

[For the 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 PC395-1

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. PC396

MARGARET WYNN

Comment PC396-1

I just read about the plans for the massive overhaul coming for the Redondo Boardwalk and Pier, and while I agree that it needs a lot of work on the infrastructure, I am very apprehensive about the renderings on display.

The Redondo Pier has a unique atmosphere that harkens back to the 1960s and 1970s. It has a charming seediness that I adore, that is what makes it one of my favorite destinations in our beach areas. I realize that many people may not agree with me, and feel the need to make everything under the sun modern and upscale, but I don't care for that kind of slick sterility. On the other hand, certain parts of the area could stand an upgrade if only to attract more visitors, but I hope that doesn't come at the cost of sweeping away the things that give the pier its charm.

I am thinking in particular of Old Tony's, with its distinctive period tiki-futuristic crow's nest upstairs bar. That style of architecture leaves very few survivors, and the place is a cherished landmark, and the main reason I still come to the pier. I hope you are able to complete your project without facelifting Old Tony's out of existence. I have been bringing friends there for cocktails for many, many years, and it is irreplaceable. Please let Old Tony's be a part of the plan for Redondo's future!

Response to Comment PC396-1

Refer to Response to Comment PC312-1. 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. PC397

MARIE STUTZ

Comment PC397-1

It was only about a decade ago that my husband and I discovered Old Tony's on the Pier and, consequently, Redondo Beach. We were introduced to Old Tony's by friends who live in Los Angeles and since then it's become an LA favorite and tradition – we're regulars now.

The mid-century modern atmosphere is genuine and you can't recreate that – Tony's an iconic example of what one thinks of when one thinks of “classic Southern California.”

We've all seen this situation plenty of times: neighborhood wants to revitalize and hires big developer to bring in “new”. In the process, the old historic spots that are part of the local heritage and history are inevitably razed or altered to the point they may as well have been razed. The historic stuff just doesn't “go” with the flashy trend of the moment; established character and trendy flash just don't mesh. As soon as the next trend in shopping/dining comes along and is instituted nearby by the newest developer of the moment, guess what happens to the “outdated” scene? Yes, its transient crowd has moved on. It's an overplayed story and I don't want to see this happen to the Pier. It's too cool for that.

Look at what Miami did in the 70s when the old Art Deco landmarks were threatened: the foresight of smart planning had them saved, new development ideas were put in place not to tear down the landmarks but to ENHANCE them, and Miami emerged as a world-class city with great landmark restaurants and destinations that are still popular today. THAT kind of smart, sustainable planning is what Redondo Beach needs to look at.

The PR ad in the New York Times highlighting the Center Cal development company sparked tons of Facebook comments from fans of Old Tony's and the historic aspects of the Redondo Beach pier in a very brief period of time. I agree that something needs to happen – but it needs to be smart, and innovative, and embracing the great character of the landmarks that MAKE the community! Wiping out the existing community and taking away the whole history of the pier is not an option. The mid-century modern heritage of the pier should be embraced, not rejected – and build on that heritage to make the pier a place to be proud of and for people to see, not a thoughtless project that wrecks all the good that was there.

Response to Comment PC397-1

Refer to Response to Comment PC312-1. 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. PC398

GRETCHEN LLOYD

Comment PC398-1

The impacts concerning public safety must be based on all the facts and scenarios that could take place any time or day of the week; not just on week days. Week-ends were not included in the statistics used to form opinions on the Impacts or lack of Impact by this development.

There will clearly be an impact if a fire or other severe emergency should break out and the fire engines, EMTs and police come down and block the streets to get to the problem area; how will the people exit the area? Harbor Drive is only 1 lane, Herondo is only 1 lane, Beryl is 2 narrow lanes, Torrance Blvd., at the opposite end of the development 1/2 mile away is 2 lanes at this time and the proposed Pacific Ave is proposed to be only 1 lane: there just will not be enough exits to safely clear out the pier and harbor area quickly and still get the emergency vehicles into the area.

The above scenario happened July 4, 2014. I witnessed this myself and it took over 1 ½ hour to clear out the civilians just from the existing parking lot and adjacent streets. Now this was only a small fire but there have been larger fires. The design of this project must be evaluated using the true facts to prevent a real disaster in the future.

What is the estimated time to evacuate the pier, harbor, lagoon, 700-seat theater and all the other new restaurants and shopping in case of the serious emergency. What will the impact be if this problem is not looked at from all possibilities. The city cannot take a chance that this EIR is not completely honest on all parts concerning the public safety. What a law suit we would let ourselves in for if this EIR is found lacking in truth.

Response to Comment PC398-1

As detailed in Section 3.11, Public Services of the Draft EIR, under Impact PBS-1, the proposed project includes a new main street that transects through the center of the northern portion of the site (approximately parallel to Harbor Drive), which would help circulation and emergency access through the northern portion of the project site. In addition, the proposed project includes the Pacific Avenue Reconnection in the area of the existing International Boardwalk. By replacing the area in front of the International Boardwalk with a two lane (one lane in each direction) through street that meets fire apparatus access requirements, the Pacific Avenue Reconnection would greatly improve emergency access and protection service throughout the project site. In addition, the proposed project would be designed and constructed to meet all applicable current state and local codes and ordinances related to fire protection. In addition, the site and buildings plans would be subject to review by the Fire Department prior to approval, and all buildings would be subject to fire inspections after they are built and in operation to ensure that required fire protection safety feature. 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). Therefore, the proposed project would not result in the need for the construction of new or physically altered fire protection facilities (i.e., fire stations) in order to maintain adequate services and, as such, the impact would be less than significant. Please also see Response to Comment 257-1 for discussion of emergency trips and traffic analysis. 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. PC399**JOHN OKANISHI**

Comment PC399-1

I understand the necessity of redevelopment from a business perspective but I implore you to preserve what money can't buy, the historical charm and significance of an establishment like Old Tony's. Please don't destroy it.

Response to Comment PC399-1

Refer to Response to Comment PC312-1. 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. PC400**LEILANI GOEPNER**

Comment PC400-1

I have fished and worked out of Redondo Beach Marina for about 9yrs many tourists and locals enjoy fishing out of Redondo more so than other Marinas. Sportfishing has so much history there and it's not over crowded with fishing boats. I hope that the City will keep Sportfishing alive!

Response to Comment PC400-1

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. PC401**JOAN RILEY**

Comment PC401-1

I have included my concerns over the results presented in the Draft DEIR. I have critiqued as well as offered suggestions to help reduce the severity of impacts on the environment and community by the proposed project.

Concerns:

1) The DEIR inadequately measured the impact of additional sound on residents and wildlife. Noise has a significant and unavoidable impact on the local environment, wildlife and the economy.

By ignoring the "acoustics of the existing environment," the findings are inaccurate and misrepresent the true impact more sound would create by the proposed development.

-The Topography of the environment, both artificial and natural, can greatly exaggerate and distort sound created near the Harbor. Sound is carried over the ocean; broadcast onto the adjacent hillside neighborhood which is composed of dense, angled, and multi-storied buildings. This western facing, sloped collection of buildings works to distort and echo sound within and through out the neighborhood. Composed of hundreds of households, the community is occupied by working professionals, and young families, and the retired. An elderly care facility is also part of the neighborhood.

-The larger neighborhood, extending up and over a mile from the harbor to Prospect Ave., is shaped as a natural amphitheater whereby sounds can be projected at remarkably loud levels. Sea lions are clearly heard at night.

The proposed project will produce sound which will adversely impact the quantity and quality of what is “acceptable noise.”

From the Office of Noise Abatement and Control, E.P.A., United States, “Noise can cause regular and predictable stress in the human body. People do not get used to noise. The body continues to react even during sleep. Noise affects the quantity and quality of sleep. The elderly and sick are more sensitive disruptive noise.”

Suggestions for reducing the significant impact of noise:

This proposed project requires specialized expertise to evaluate the true impact of “noise” on this unique area adjacent to the waterfront.

Define acceptable noise within and outside the current waterfront neighborhood.

The project needs to be reduced in size and density with greater undeveloped spaces. Buildings need to be organized, oriented, and shaped to reduce noise. Building vents, windows, doors, outdoors and inside seating areas need to be set to minimize noise impacts on residents. Sound barriers cannot further block views.

Eliminate Pacific Ave. Many homes are extremely close to the proposed road. Residents will be unfairly impacted by noise and emissions.

Establish a method to monitor, report and immediately resolve excessive noise abuses.

2) The consequences of Pacific Ave cannot be mitigated. It is a public safety and pollution hazard.

Traffic congestion, noise, and vehicle emissions are unhealthful and dangerous to the visitors and residents. Adding a road so close to the ocean is inconsistent with pedestrian recreation by the sea.

Suggestions: Restrict Pacific Ave to daytime hours and close completely on weekends.

3) Diminished ocean views from Harbor Blvd!

Most of the pedestrian water views will be sacrificed for the proposed plan.

In addition, views of the Palos Verdes Peninsula, will no longer be enjoyed from Harbor Blvd. The proposed “Market Place” building at 2+ stories is too high and blocks ocean views from part of Czuleger Park.

Other previously accessible views of the ocean from the waterfront will be blocked by the project. Visitors will have to walk around and in front of the project to see their “public access” view of the water.

Suggestions: Don’t allow standing views of the ocean to be blocked by the proposed project. Reduce heights of building, and create more open vista space within the project.

4) Impact on Czuleger Park is not identified. Czuleger Park is the central green pathway and largest open space next to the proposed project. The DEIR does not address “over-use” of the park by hundreds of visitors passing through to the proposed project. The increase in park use will affect the amount of noise, garbage, crowding etc., that will result in loss of use of a community park. .

Suggestions: Physically restrict access to Czuleger Park at sundown and monitor adherence. Add a different,

primary pedestrian entrance to the project.

5) Improvement to Seaside Lagoon. Replace the natural lagoon with modern saltwater pools that are designed for both families and the elderly. We have a rapidly aging city with no facilities for seniors to recreate and exercise in therapeutic warm water. The pools can be open year round to maximize participation and success.

Response to Comment PC401-1

The comment is substantively the same as Comment PC385. Please refer to Response to Comments PC383-1 to PC383-5. 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. PC402

DOUG SAHARA

Comment PC402-1

Why are you adding fuel the fire regarding closing down of Redondo Sportfishing? Our economy is doing bad enough you want to put more people and business out

Response to Comment PC402-1

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing. As for businesses at the proposed project, refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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. PC403

SAM ELDER

Comment PC403-1

The Waterfront Draft includes only a boat ramp for boat access to the water. I am concerned that the plan does not include at least one hoist to accommodate the older and physically challenged. This boating population will no longer have usable access to the water. The boat ramp requires a physical ability that this population does not have.

I addressed this issue to the City Council when the hoists were not working and started a petition at that time. Once, one hoist was repaired and working some of the people, who had collected signatures, destroyed their petitions, not realizing the new Waterfront plans did not include a hoist. I again addressed the City Council on January 11, 2016 regarding the need for a hoist in the new plans.

I have attached my address and the original petition with signatures. I have started collection signatures again on a new petition.

I am confident that the City of Redondo Beach will not forget the needs of the older and physically challenged boating population in the new Waterfront Development Plan. This is a great City the includes everyone. I have enjoyed living here for 40 years and would not live anywhere else.

Response to Comment PC403-1

The City understands the need for a public hoist and is looking at an alternative location at which to support a public hoist in King Harbor. 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 PC403-2

I am Sam Elder and I have been a resident of Redondo Beach for 40 years.

Mayor, Honorable City Council, I am here once again to speak to you on behalf of the all fisherman and boaters in the South Bay but especially the older and the physically challenged---- we are all concerned about possible plans to eliminate the hoists in King Harbor.

One is currently operational and I understand that the second hoist will not be repaired.

Further I understand that both will be replaced by a one lane ramp which would not only be very congested but it would also be a nightmare to use for those of us who are elderly or physically challenged in one way or another. The two hoists are barely enough to keep up with the boat traffic now.

There has been a line of 20 boat waiting to be launched at 4:30 am awaiting the opening time of 5:00 am when two hoists were operational. Imagine the delays and congestion with only one hoist or only a one-lane ramp.

I am concerned that the older and the physically challenged boating population will no longer have usable access to the water. It is my understanding that with the new development change in King Harbor, the hoists will be eliminated.

And there seem to be no plans for a future hoist. This will be tremendously detrimental to an entire sector of the community. I have been using the King Harbor hoists for my boat since 1983. As so many other residents have. And many of us are seriously concerned.

The hoists have made it very easy to put our boats in and out of the water for an enjoyable day of fishing and boating. If you recall, I explained last time I spoke why the hoists are invaluable:

- 1.It allows for the boat to enter the water without having to submerge boat trailers in salt water which destroys the equipment and more importantly;
- 2.Using a ramp rather than a hoist mean you must enter the water to physically launch a boat. It requires much more physical exertion and strength. This would leave no meaningful access to the water for those who cannot handle the exertion.

The one hoist that is now operational is in danger of closing. It is not even in the plans of the new development. Please do not forget us. Please restore the hoists and include them in the new development of the Harbor.

We must retain the hoists to allow access to those physically challenged. Only the hoists afford this access. Ramps do not.

This is a matter of immediate concern and I thank you on behalf of all those who rely on you. Thank you for your attention and consideration. I have copies of the petitions to hand out to you.

[For the petition included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC403-2

Refer to Response to Comment PC403-1 above. 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. PC404

APRIL F. TELLES

Comment PC404-1

Below are my comments on The Waterfront DEIR. Please let me know that you have received this and that this is now part of the public record for this DEIR.

Comments in response to "The Waterfront Draft Environmental Impact Report (DEIR)"

To whom it may concern,

I have lived in the South Bay since 1986; first in Redondo Beach from 1986 to 2010 on Avenue A and Pacific Coast Highway and currently, my husband and I live right over the border in Torrance near the intersection of Palos Verdes Blvd and Pacific Coast Highway in the Lower Riviera. I have lived and played in the South Bay for 30 years and am concerned about the negative impacts the proposed overdevelopment at the Redondo Beach waterfront is going to have on our quality of life. This development, as proposed in the DEIR, is too much in too small an area and I fear losing the character of the pier and Redondo itself. We often eat at the pier and entertain our out of town family and friends there. If it becomes like "Pier Avenue" or "any mall" in America, if it becomes unbearable with car noise and nothing but concrete, if it becomes overdeveloped and overpriced we will be saddened to no longer frequent it.

My husband and I attended the December 9, 2015 public workshop held by the City of Redondo Beach at the city's main library.

Below are a few of the major flaws I see in the Draft Environmental Impact Report for "The Waterfront" project in Redondo Beach.

Section 3.13 Traffic and Transportation

Per Table 3.13-11: Project Trip Generation Estimates, 12,550 additional car trips per day will be generated. It is unclear if a true worst-case analysis has been performed or if only a worst-case analysis for weekdays as it appears based upon the footnotes in Table 3.13-11. (See footnotes [b] and [d] which both specify worst-case analysis for weekdays). In addition, it is not clear if the analysis was performed for summer peak usage or off-season usage when area utilization and therefore traffic, is much less. If the impact analysis was not performed for weekend, summer traffic, it is flawed, incomplete and therefore the DEIR is sorely lacking in this area and impacts underestimated. Further, mitigations measures will be insufficient and may even be impossible to fully mitigate impacts to less than significant.

Response to Comment PC404-1

For weekend traffic, please refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. As noted in Draft EIR Section 3.13.2.3.1 "to characterize the existing intersection operating conditions, weekday morning and afternoon peak period intersection turning movement counts were conducted at the study intersections in the summer of 2013 and the spring of 2014. The maximum peak hour traffic volumes for each intersection from the combined data sets were selected to reflect peak volumes at each intersection, regardless of season." The traffic mitigation measures detailed in the Draft EIR

were analyzed in a traffic model that concluded that these measures would fully mitigate impacts to less than significant. The commenter does not provide such evidence to show why they believe that the measures are insufficient. For discussion of roadway noise, please see Draft EIR Section 3.10.

Comment PC404-2

3.13.2.3.7 Existing Parking

The amount of new parking spaces proposed is completely inadequate to support the amount of new development. The amount of development is proposed to increase from 219,881 sq ft to 523,939 sq ft (Table ES-1) (approximately 138% more development). The number of parking stalls is proposed to increase from 2,192 (Table 3.13-9) now to 2,363, (Table 3.13-21) (approximately 7% more parking). To increase development by 138% while only increasing parking by 7% will further exacerbate the traffic impacts described above as frustrated visitors circle around looking for locations to park. Either parking has to be increased significantly or the development has to be dramatically decreased to have a better match between size of development and parking needs.

The proposed parking management plan (MM TRA-7: Parking Management Plan) is completely unrealistic and unworkable. Expecting employees and visitors to shuttle is completely contrary to human behavior. You might be able to require employees to do so, but many visitors will not bother if they have to leave their personal vehicles to shuttle to and from the development.

Response to Comment PC404-2

Parking is addressed in Section 3.13 and Master Response #7: Waterfront Parking. As detailed in the Master Response #7: Waterfront Parking, the Redondo Beach Municipal Code requirements allow for shared (overlap) parking, which is appropriate for the uses at the project site, and with this shared parking the project would have more than enough on-site parking for the proposed development. The proposed project does not include off-site visitor parking.

Comment PC404-3

Here are some additional significant detrimental impacts from this development.

1. The proposed Pacific Avenue reconnection. An estimated additional 30,000 cars per day on this road where there is now a boardwalk: Aesthetics, Greenhouse Gas Emissions, Traffic, Noise, and Air Quality will all suffer tremendously. Even using the statistic of 12,550 additional car trips from the DEIR's Table 3.13- 11: Project Trip Generation Estimates, these impacts will still exist and be significant. Currently walking on this boardwalk not a single car can be heard nor smelled.

Response to Comment PC404-3

No explanation or information was given by the commenter as to how the estimated additional 30,000 cars per day on the road for the Pacific Avenue Reconnection was determined. In fact, the proposed project in its entirety would result in less than the total trips the commenter has provided (e.g., the project would result in 22,234 daily trips, which is an increase of 12,550). The traffic analysis (in Section 3.13 and Appendix L1 of the Draft EIR) determined that with mitigation impacts on traffic would be less than significant. Furthermore, most of this traffic is not anticipated to utilize the Pacific Avenue Reconnection. (See Draft EIR Appendix X-2 for detail information of trip distribution, which has been update in Chapter 3 of the Final EIR). The trips that do use the reconnection 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. Please also refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. The commenter's opinion on traffic is noted.

The construction and operation of the Pacific Avenue Reconnection was analyzed for all 14 environmental resource areas (including use by motor vehicles), including aesthetics (Section 3.1), greenhouse gas emissions (Section 3.6), traffic (Section 3.13), noise (Section 3.10), and air quality (Section 3.2). With the exception of air quality and noise during construction and the potential increase in existing ambient noise levels associated with vehicle traffic along Torrance Circle/Boulevard between the project site and Catalina Avenue, the impacts of the reconnection were found to be less than significant. The reconnected roadway would be approximately 28 feet below the first floor residences of the adjacent Village/Seascape condominiums and not expected to increase noise along the new roadway. As for odors from vehicles, Section 3.2 of the Draft EIR found no operational air quality impacts or health effects. Motor vehicles currently access the project site, and are not expected to have a significant impact associated with aesthetics. (E.g., Draft EIR Section 3.1.2.4.)

Comment PC404-4

2. The size of the development at 523,939 square feet. It will impact:

- Aesthetics: Chain stores at the waterfront will degrade the unique character of the King Harbor waterfront to be like any other large scale mall development. Also has high potential of becoming a white elephant as the younger generation primarily shops online.
- Greenhouse Gas Emissions: created in the demolition and construction phases as well as water and electricity demand to operate

Response to Comment PC404-4

Section 3.1 of the Draft EIR addressed the aesthetics and visual resource impacts associated with the proposed project regardless of the retail vendors that might use the site. Refer to Master Response #9: Views and Scale of Development for additional responses on aesthetics and Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on businesses and character of the site. To clarify, the proposed redevelopment of the project site is not a 'large scale mall develop' but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment 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.

As for greenhouse gas (GHG) emissions, as detailed in Section 3.6 of the Draft EIR, although the construction and operation of the proposed project would generate GHG emissions from a variety of sources, development would not exceed the South Coast Air Management District's annual 4.6 MTCO_{2e} project level service population emissions threshold; therefore, the net increase in GHG emissions resulting from project implementation is considered to be less than significant and no mitigation is required. The proposed project would be designed to comply with the California Green Building Standards Code to ensure that the new on-site developments would use resources (energy, water, etc.) efficiently and reduce pollution and waste. The proposed project would also be consistent with Title 24 for energy and water conservation practices. Additionally, the proposed project would be recycling building materials on-site where feasible and transferring to a sorting facility for recycling when the material cannot be used on-site, therefore increasing recycling conservation.

As discussed in Draft EIR page 3.6-6, one of the goals of the California Legislature is to reduce greenhouse gas emissions by providing infill development, with access to transit, pedestrian, and bicycle facilities, to reduce reliant upon personal vehicles (Senate Bill 375). As noted on page 3.6-7, the project results in a reduced per service population GHG emissions and provides users of the project site with numerous transportation options

that are not reliant upon personal vehicles.

Comment PC404-5

3. Demolition of over 200,000 square feet of current development including the entire international boardwalk and elevated walkway. This boardwalk is frequented both by local families as well as tourists. Replacing this with a road will be a loss to both. Why would a tourist come to the new development if they could go to the same establishments anywhere? There is also an economic issue at play here. The establishments on the boardwalk including Quality Seafood and the Fun Factory are frequented by many for fun at low cost. These individuals and families I believe will be shut out of the new development due to cost alone besides the fact that it doesn't appear that the construction will be geared towards families with young children.

Response to Comment PC404-5

Site connectivity and coastal access would be increased by the establishment of the Pacific Avenue Reconnection. With the demolition of the International Boardwalk (which currently floods during storm conditions) and elevated walkway, the Pacific Avenue Reconnection would be a new throughway that would provide vehicular, bicycle, and pedestrian traffic connectivity between the northern and southern portion of the project site, providing a direct link between Pacific Avenue/Harbor Drive and Torrance Circle. The reconnection would consist of a two-lane roadway, an 8-foot walkway to the west of the roadway, and a 12-foot bicycle path east of the roadway. Along Basin 3, the walkway typically would be approximately four feet lower than the roadway elevation, and the bicycle path would be seven feet above the roadway elevation. The walkway and bicycle path elevations would gradually level off to match the roadway elevations at the parking structure on the southern portion of the project site (Figure 2-18 of the Draft EIR). At locations where the elevations of the three travel-ways vary, decorative railing and low walls would separate the travel modes. A new retaining wall would be constructed in front of the existing retaining wall that spans the existing elevated walkway. As shown in Draft EIR Figure 2-20, the project includes numerous additional pedestrian pathways, in addition to access along the Pacific Avenue Reconnection. Please also refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on businesses and character of the site.

Comment PC404-6

4. Views: Much of the new development will be more than 1 story high including a new parking structure near Beryl and Harbor Drive. This is both an aesthetic and air space impact: It would be highly imposing to have any "higher than 1 story" development in this area. Just more concrete and potential for blockage of views. A four-level 757-stall parking garage is proposed at this northeast corner of the site. The parking garage would not exceed 45 ft in height as measured from the existing sidewalk elevation at Harbor Drive at the point nearest to the building or structure consistent with Zoning Code Section 10-5.814. Entrances and exits to the garage would be located on Harbor Drive and via a driveway accessible from Portofino Way and the new main street. This structure is sure to be an imposing eyesore again blocking views and also not user-friendly to those carrying recreational equipment such as surfboards/ SU paddle boards.
5. The proposed height of the new 2 story boutique hotel as well as new establishments on the horse shoe pier. The report says "1-2 stories as measured from the top of the current parking deck. The hotel would not exceed 30 feet from the grade of the current pier plaza office entry level." This has potential to be aesthetically displeasing, block views, and increase both noise, traffic, and air pollution.

It is actually difficult for me to picture these heights from these reference points as I am neither a civil engineer nor an architect. All drawings thus far have been 2-dimensional which is misleading at best. Models should be shown to the public making the new heights visible and easy to understand in reference to current surroundings.

Better yet, why not put stakes and tape in place like the hillside overlay to let the citizens of Redondo Beach and those who frequent the waterfront see what is truly being proposed? It may surprise us all that some may have less impact than others. This way there will be no surprises later when it is too late to go back. If what is proposed is really such an improvement then why not give the public this view into the plan to buy into it as well?

In general, from the DEIR it looks like along Harbor Drive we are going to be left with a few view corridors and that is all. Even the current construction of the Shade Hotel is obstructing what before was a pretty nice open view enjoyed traveling on Harbor Drive whether via car, bicycle, or on foot. The Shade construction is a mere fraction of what is being proposed in the waterfront development. We all live by the waterfront to see and enjoy it in our daily lives; not to have it blocked by a wall of development and shops.

Response to Comment PC404-6

Please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Master Response #9: Views and Scale of Development in this chapter of the Final EIR. Please also see Master Response #4: Modifications to the Seaside Lagoon, for discussion of equipment drop-off options. Please see Response to Comment PC404-3 for discussion of noise, traffic, and air pollution.

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 PC404-7

I also believe that introduction of several businesses on the horseshoe would be detrimental aesthetically as well as polluting to the surrounding air and ocean. As much as I liked the earlier pier with Breakers, Cattlemens, and the Edge I think the city has done an amazing job with the new horseshoe design. It is so open and really puts the ocean and the sunsets at center stage, which is really why we all go there anyway. It should not be "cluttered" with structures which will block this "natural" view. Do not undo what the rebuilding of the new horseshoe had foresight to accentuate.

Response to Comment PC404-7

As shown in Figure 2-8 of the Draft EIR, the center open area of the Horseshoe Pier would be retained under the proposed project. Although all the buildings on the Horseshoe Pier, with the exception of Kincaid's, would be demolished and rebuilt, only the vacant building pad adjacent to Kincaid's (northern segment of the pier) would have a new building footprint (the building pad currently exists at this location as it was planned for future development). This structure was considered in the aesthetics analysis in Section 3.1 of the Draft EIR.

Comment PC404-8

6. Child safety and water quality. Water quality within the breakwater is already compromised in Redondo Beach. Opening up the Seaside Lagoon to the harbor for young children to be in while at the same time adding a nearby boat ramp seems like a recipe for health issues. My nieces and nephews have enjoyed the current seaside lagoon and their parents felt comfortable with their safety in the controlled environment. They would not allow their children to swim in the proposed configuration both due to safety from tide and boats as well as bacteria prevalent in the water.

Response to Comment PC404-8

Please refer to Master Response #4: Modifications to the Seaside Lagoon.

Comment PC404-9

7. The northern part of the project may receive fill material range from 1 to 6 feet, in fact 150,000 cubic yards of fill on the land side. More worrisome to me is the water development to include: dredging, filling, rock placement, in-water concrete placement, sheetpile installation, and pile driving. This has obvious impacts to the plants and animals residing in this area as well as noise and possible water quality impacts.

Response to Comment PC404-9

The potential for the construction and operation of the proposed project to affect biological resources, noise and water quality was detailed in Sections 3.3, Section 3.10, and Section 3.8, respectively. Impacts from construction were found to be less than significant with mitigation for biological resources, significant and unavoidable for noise, and less than significant with mitigation for water quality.

Comment PC404-10

Alternatives:

I am not against refurbishment as has been successfully done as of late with the Landing and the addition of Barney's Beanery. Something similar could be done with the existing "village" overlooking the Pier which has never been fully occupied. With the right design and establishments there is no reason this could not be successful.

I do also fear that current leasees will be forced out as rents rise. We need to be careful not to lose all continuity to our waterfront history. For instance Tony's and Polly's are long time establishments of more importance to residence and users of the waterfront than the bottom \$ line. We need to not lose all unique character that has developed over the years and also all "memory places" that families go back to generation after generation. The loss of the sport fishing pier is an impact to our waterfront history and to the current quality of life enjoyed by many. A movie theater or retail store is not an acceptable replacement. Again, it will be a sad day when The Redondo Pier and King Harbor are no different than any other overdeveloped waterfront "mall" in the country.

Response to Comment PC404-10

Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on businesses and character of the site, and Master Response #5: Sportfishing Pier, Polly's and Sportfishing, regarding the Sportfishing Pier. Please see Response to Comment PC534-6 for discussion of drought tolerant landscaping. For discussion of biological resources, please see Draft EIR Section 3.3. 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 PC404-11

I would note here that any new green space has a potential Biological Resource impact. I would implore the developers to look long and hard at 1) Any development that will require use of more water albeit a fountain, structure, or otherwise. 2) That in clearing land be cognizant of impact removing native plants as well as impact to native species of insects, animals, etc. and 3) Any new planting in green space, medians, etc be

used as an opportunity to use drought tolerant, native plants to ensure as little water usage as possible in the future while creating habitat for native species and restoring Redondo Beach closer to what it once was.

Lastly, at the Dec 9, 2015 meeting I heard that there was no significant impact to the resident species such as CA brown pelicans. Because the proposed footprint includes underwater coverage, marine life will definitely be impacted. In addition, to name a few, the Brown Pelican and Blue Heron are protected. This project will no doubt impact them given that the proposed construction will be for an extended period. Especially if construction occurs during the nesting period, these species could be significantly negatively impacted. As these species are protected, this is not acceptable. Their continued residence needs to be a criteria in any plan moving forward. I've included a list of protected species from your **DEIR Appendix D1- Biological Resources Assessment Table 5. Protected Species Expected to Occur Within the Study Area.**

Common Name	Status	Occurrence at Study Area
California Brown Pelican	CDFW FP	Present
Double-crested Cormorant	CDFW WL	Present
California Least Tern	SE, FE	Likely*
Green Sea Turtle	FT	Infrequent
Broomtail Grouper	CDFW FP	Present
Bottlenose Dolphins	MMPA	Not expected
Harbor Seal	MMPA	Likely
Northern Elephant Seal	MMPA	Not expected
California Sea Lion	MMPA	Present

SE – State Endangered; FE- Federally Endangered; FT – Federally Threatened; CDFW SSC- CDFW Species of Special Concern; CDFW-FP – CDFW Fully Protected Species; CDFW-WL- CDFW Watch List; MMPA – species protected by the Marine Mammal Protection Act

*Least terns are a migratory species found in the area from approximately April 1 through September 1 of each year.

Response to Comment PC404-11

As detailed Section 3.3, Biological Resources of the Draft EIR (as well as Appendix D1), the existing wildlife and vegetation (on land as well as in the water) were addressed. 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). The biological resource analysis in Section 3.3 considered the California Brown Pelican and the Blue Heron. As detailed in the Draft EIR, conditions of approval and mitigation measures were provided to protect wildlife (on land and in water) during the construction of the proposed project. With implementation of mitigation measures, the impacts would be reduced to less than significant.

COMMENT LETTER NO. PC405

JEFF POOL

Comment PC405-1

Please see my comments below.

Aesthetics

This project will adversely affect numerous scenic views, both public and private, of the ocean, harbor and pier area by partially or totally blocking those views. The project should be designed such that no structures are

taller than the existing structures on the site and seek to avoid new higher development where there are currently no structures or only one-story development. The proposed four-level above ground parking structures are particularly an abomination. Parking should be on lower levels wherever possible, similar to the existing pier parking facility, to preserve views and allow them to be enjoyed by other uses. Also, refurbishment of the existing parking should be considered to minimize the number of new spaces that must be constructed. The DEIR, while evaluating certain specific "key views", does not mention many of the other scenic vistas in the area that would be adversely impacted, nor does it give any sense of the sheer number of scenic views that could potentially be impacted.

Response to Comment PC405-1

Regarding views at the site, please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Master Response #9: Views and Scale of Development. Please also see Response to Comment PC333-3 for discussion of other viewpoints.

Comment PC405-2

Air Quality

The air quality in the adjacent neighborhood to the east will be adversely affected by vehicle exhaust from traffic trying to ingress and egress from the project, and from smells from restaurants and other businesses that are part of the project.

Response to Comment PC405-2

For analysis vehicle exhaust and odors, please see Section 3.2, Air Quality of the Draft EIR.

Comment PC405-3

Land Use and Planning

Redondo Beach and its sister beach cities have always been characterized by smaller community-sized developments. This is not Century City, The Grove (in Wilshire Center) or even Santa Monica; all of those are in higher density, more populous areas that can better support higher density developments. Redondo Beach should insist on a development that will be more in scale with the surrounding community and preserve key businesses and features that are important to the residents and business community. The currently proposed project is too large and dense for the community and will adversely affect surrounding neighborhoods because of its excessive size and incompatibility.

Response to Comment PC405-3

Please refer to Master Response #9: Views and Scale of Development. As for the size of the development, 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. 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.)

Comment PC405-4Noise

The project will result in increased noise from businesses within the project, and pedestrians and traffic coming and going.

Response to Comment PC405-4

Section 3.10, Noise of the Draft EIR addressed the potential noise impacts of the proposed, including project activity and roadway noise.

Comment PC405-5Cultural/Historical

Some longstanding iconic businesses, such as “Tony’s on the Pier” may have to be closed or relocated into more generic commercial suites in the proposed new development. This would take away important pieces of the City’s history and culture. Any redevelopment of the pier and harbor area should take these concerns into consideration and preserve important features and businesses that are part of the area’s history and cultural identity. A generic outdoor shopping mall similar to hundreds of others will not benefit the City or the local community.

Response to Comment PC405-5

Regarding Tony’s, please refer to Response to Comment PC312-1. Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on businesses and character of the site.

Comment PC405-6Traffic/Circulation

By substantially increasing the amount of commercial development in the vicinity, the proposed project will create significant traffic impacts on the surrounding community. The project site has relatively limited access as virtually all vehicular traffic must arrive via Torrance Boulevard, Harbor Drive, or Beryl Street. These streets are all relatively narrow (no more than two lanes in each direction) and are already significantly congested on weekend beach days and other high traffic times. Also, congestion on these streets adversely affects the traffic flow on the major arteries of Catalina Avenue and Pacific Coast Highway, which intersect those streets.

The project’s proposal to extend Harbor Drive south from Pacific Avenue to Torrance Boulevard will not reduce these traffic impacts because all traffic into that area must still arrive via the aforementioned three streets in order to reach the proposed new segment. The only thing this proposed extension will achieve is to create more congestion at the new intersection of Harbor Drive and Torrance Boulevard, and create substantial noise and air quality impacts to the residential area immediately east of the Horseshoe Pier.

Response to Comment PC405-6

Please see Draft EIR Section 3.13, Traffic and Transportation, for discussion of traffic, including trip distribution in Section 3.13.4.1.1. 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 Chapter 4, Alternative 5 for discussion of an alternative with no Pacific Avenue Reconnection.

Comment PC405-7

Other Related Projects

The environmental impacts of the Waterfront Project will be exacerbated by other proposed projects in the vicinity. The City is considering the demolition of the existing AES power plant a short distance northeast of the project site, which will result in a substantial amount of new development nearby, which in conjunction with the Waterfront Project will result in even greater environmental impacts than either project would create by itself. One of the reasons Redondo Beach has some strange development patterns is that projects have historically often been planned and looked at “piecemeal” as if each one were an individual project on an island, rather than looking at them as a coordinated whole. Planning the Waterfront Project alone is a continuation of this trend. The waterfront should be planned in conjunction with the AES power plant site and other surrounding areas to develop a consistent and coordinated plan for the entire community, rather than planning these projects separately, each pretending that the other does not exist, which will ultimately result in a problematic pattern of development and greater environmental impacts for the entire area.

Response to Comment PC405-7

Please refer to Master Response #1: AES Power Plant Site.

COMMENT LETTER NO. PC406

DENISE & DENNIS GROAT

Comment PC406-1

Please see the attachment for our comments on the CenterCal DEIR.

DRAFT EIR (DEIR) COMMENTS 01-18-16

SUBMITTED BY DENISE AND DENNIS GROAT, RESIDENTS AND BOATERS, REDONDO BEACH

Please accept our comments and questions on the CenterCal Project DEIR.

The issue of the location of a public boat ramp for the launching of trailered vessels is one of the subjects presented in this DEIR. Ultimately, this documents presents Mole A as the “environmentally superior location” for this boat ramp. As long-time boaters and users of King Harbor, we were beyond surprised at this conclusion, and ask for responses to each of the following issues.

Previous Studies: At least three previous studies addressed the issue of the public boat ramp – The 1989 DMJM study, and two subsequent engineering feasibility studies by Moffat-Nichol. These studies all led to the conclusion that the best location for this ramp is the south turning basin area on Mole C, approximately where the “Joe’s Crab Shack” restaurant is currently located. Two subsequent community boat ramp design meetings looked at this issue in great detail and reached the same conclusion. Several design proposals evolved from these processes, with variations on design, and on the size/location/layout of a secondary small, interior breakwall to provide surge protection for the boat ramp. In the two community design meetings, in response to concerns of conflicts between trailer boaters and the users of Seaside Lagoon, the layout of this breakwall was “flipped” to provide a physical barrier between trailer launched boats and the users of the Seaside Lagoon.

The project proposes a two-lane boat ramp with a breakwall at the Mole C location. The DEIR for the Mole C location does not include the above-referenced breakwall, which provides not only a measure of safety and

separation, but also a new area of habitat that would likely more than offset the losses of soft bottom under the new breakwall. Additionally, the DEIR acknowledges that in the one lane Mole C option, space for additional boat ramp parking could be provided, and states that the extra area at the Joes' Crab Shack site would be paved over with asphalt. Why was this breakwall excluded from this evaluation, why was the two-lane option at Mole C not included, and why were these exclusions directed by City staff?

SAFETY: The DEIR states that it will address safety related to wave action, storms, and surge in the evaluation of the proposed ramp locations, but other than “navigational safety”, we cannot find any evaluation of wave, storm, and surge safety at the evaluated locations. Mole A presents significant inherent safety hazards that are not present at the other evaluated sites.

Mole A's location abuts the outer breakwater wall for the entire harbor. In the early 1960's, one of us and a friend were present when a set of rogue waves washed a fisherman we were acquainted with off of this outer breakwall and far into the inner harbor channel. Our screams to him to swim to the relative safety of Mole B apparently could not be heard. He tried desperately to swim back to the outer breakwall, fighting against the unusually large waves that continued to pound over it. These large waves and the tremendous weight of his wet, heavy clothing soon exhausted him, and we watched helplessly as he quickly became overwhelmed and drowned. A short time later, lifeguard divers located his lifeless body somewhere under the harbor waters. The sight of his lifeless body being unloaded from the swimstep of the lifeguard boat onto a dock at the King Harbor Yacht Club site is something that cannot be erased. The dangers of the outer breakwall continue to this day and into the future. Waves, rogue waves, and whitewater come over this outer breakwall on an unscheduled and not accurately predictable basis. Some recent examples include, but certainly are not limited to: The City was a defendant in a lawsuit that resulted from injuries from waves suddenly coming over the outer breakwall onto Mole A, in the same location where the boat ramp is proposed. This lawsuit resulted in a significant payout from the City to the injured persons. In 2014, members of King Harbor Yacht Club witnessed a man and his dog being washed off of the area of the proposed Mole A ramp into the harbor waters. Almost miraculously, this man and his dog were spared major injuries and survived this incident. El Nino events have also caused serious damage to facilities on Mole A, and often require that the road to Mole A and its facilities be closed. A boat ramp in this area would not only be subject to damage from waves, storms, and rogue waves, but also would be closed for large wave events, and for repairs for damages from these events.

We also have concerns on the information depicted in Figures 4-4, 4-5a, 4-5b, and 4- 5c. The DEIR repeatedly states that the existing hoists at King Harbor Yacht Club will remain under all three ramp proposals on Mole A. King harbor Yacht Club has two hoists that are both frequently used, but in Figures 4-5a, b, and c, only the “eastern- most” of these two hoists is depicted. The existing docks can be seen as white shadowy areas in these figures, and the interference between the use of King Harbor Yacht Club's existing “western” hoist and the hand-launch ramps in the proposals cannot be properly seen. It appears certain that boats hanging from the western King Harbor Yacht Club hoist would pass directly over the proposed hand launch ramp in Figure 4-5c, and likely would pass over the hand launch ramps in Figures 4-5 a and 4-5b. This would present an EXTREME safety hazard to anyone on the hand launch ramps, both from swinging boats and from a possible rigging failure on a boat hanging from the hoist. Additionally, the docks required for the use of these hoists has been modified in these Figures, and it appears that there would not be adequate launch docks area for the hoists to be functional. The hand launch ramps also pass obliquely across the hoist launch dock area, likely interfering with the safe use of the hoists and their docks. Figures 4-5a, 4-5b, and 4-5c do not properly depict existing conditions and conditions under the three Mole A proposals as described in the DEIR, and thus present misleading information to the DEIR readers.

We spent many years as trailer boaters in the ocean, and we are not aware of any harbor in Southern California where the boat launch ramp is adjacent to an outer breakwall, or where it would be subject to the wave action that occurs on Mole A in King Harbor. In light of the preceding information under this Safety heading, why was

the issue of wave action and safety to humans at the Mole A location not addressed in the DEIR, and why wasn't the relative safety of the alternative locations as compared to Mole A addressed?

NAVIOGATIONAL SAFETY: As experienced boaters, the conclusion that the mole a location provides more safety due to the lower amount of boat traffic at this location is troubling. King Harbor hosts not only large medium, and small boats, but also to a variety of dinghies and human-powered craft, including outrigger canoes of various sizes, rowing sculls, kayaks, stand-up paddle boards, rental boats, and rental peddle-powered craft. The harbor area adjacent to Mole A also is the site of many sailing instruction programs for both adults and youths. Rather than being remote and relatively low traffic, the many programs and activities occurring in the vicinity of Mole A cause it to be an extremely active area, and at times perhaps the busiest area of the harbor when one looks at all of the uses that are occurring. The City recently installed an extensive mooring field between the Mole C area and Mole A area. There are also large areas of shoaling adjacent to the outer breakwall on its interior side (both the mooring field and the shoal areas can be seen on DEIR Figure 4-4). Boats using a launch ramp on Mole A would have to transit the entire length of the harbor, and have to contend with all of the traffic and craft in the main channel area, as well as the mooring field and shoal areas. The South Turning Basin area is relatively close to the entrance/exit of the harbor, and does not involve the mooring field, shoals, and much of the main channel traffic. Why is the relatively remote Mole A location with the above described conditions considered safer for users and for trailer boaters who may be unfamiliar with the harbor than the south turning basin area, where boaters can easily see the proximate entry/exit to the harbor and avoid the mooring fields, shoal areas, and most water users?

APPENDIX L2: Appendix L2 includes a section on demand for a ramp for trailered boats, and concludes that the demand for a boat ramp in King Harbor is actually decreasing. The data used to reach this conclusion come from City figures on the use of the two "crane"-type hoists that are in the Mole D basin. As former users of these hoists, we believe that the data obtained from their current use does not in any way accurately depict the demand and needs for an actual boat ramp. As compared to a functional boat ramp, these hoists are costly. The hoists have limited hours of availability, and these hours do not coincide with many small boat uses such as diving, fishing, and transits to and from local islands and recreation areas. They also require an incredible amount of time and effort to use. Trailered boats must be jacked up off of the trailer "beds" on each end consecutively so that the lift straps can be put underneath the boat. If the straps are not properly placed for weight distribution, the process must be repeated. Making special modifications to our trailer lessened the time somewhat, but not to a point where it compared to ramp launching. The net result for the existing crane hoists is a costly, limited access, lengthy, complex operation that causes boaters in line to wait an inordinate amount of time to launch their vessel, as compared to a boat ramp. The parking for the existing crane hoists is also a major problem. Although specific spaces are marked and signed in the parking area as for tow vehicles and trailers only, these spaces are commingled with regular vehicle parking, and often times the trailer spaces are blocked with passenger vehicles using the harbor amenities, making it impossible to park a tow vehicle and trailer in this area after using the crane hoist launch facility. On several occasions we found all of these dedicated spaces unavailable, with passenger vehicles illegally using some of these spaces. When we attempted to have a passenger vehicle moved from one of these tow vehicle and trailer spots so that we could utilize it, no one and no agency was willing to do so. With all of these adversities, we discontinued using these crane hoists and opted to drive to boat launch ramps at Marina Del Rey and Cabrillo Beach instead. The DEIR data also does not seem to include information on the time periods when one or both of these hoist was out of service or unavailable during normal operating hours. Such data seems critical in determining the actual demand for these unique launching services.

Regarding the actual estimated demand for trailered boat launches in King Harbor, it is our recollection that a previous City document (March 2014 Launch Ramp Feasibility Report) estimated that the total launches for trailered boats and vessels in King Harbor "are estimated at up to 16,480", with only two lanes considered for these launches. This seems like important data, and a more realistic assessment of potential demand for a boat ramp in King Harbor

ACCESS: The DEIR analyzes basic traffic impacts, but does not adequately examine the roadway conditions necessary for vehicles with trailered boats. The physical ability of a full-size tow vehicle with a large trailered boat to access and depart Mole A appears to be highly difficult, if not impossible, under current conditions. Unlike Moles C, Mole A does not have a direct “in-line” access from a paved street. Mole C can be directly accessed in a straight path from Beryl Street. To access Mole A, 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 and meander through several turns to the narrow roadway that leads to the end of mole

A. With the new Harbor Drive bicycle lanes, the single lane in each direction on Harbor Drive is very narrow. Turning right onto Harbor Drive from westbound Beryl Street while towing a larger trailered boat may not be physically possible. Additionally, turning right onto Harbor Drive when departing Yacht Club Way would be difficult for a right turn, and if a vehicle is cued up to turn left into the AES site from Harbor Drive, seemingly impossible to turn left. The turns required on the existing path of Yacht Club Way would be extremely difficult for someone towing a boat and not extremely familiar with this area. Additionally, the lane widths on Yacht Club Way are extremely narrow, with a sharp “S” turn required to access the western Mole A areas. Trailered boats and their tow vehicles would have significant difficulties passing each other inbound and outbound, and very likely could not safely navigate the “S” turn at the same time. With the minimal sight of the approaches to this turn, a gridlock condition could easily occur, with no forward “escape path” available. The long backing up that likely would have to occur in these situations would require a degree of skill that is customarily found in professional truck drivers. In our opinion, these conditions demand a detailed analysis of accessibility, widths, and turning radii by a qualified traffic engineer, done with a basis of a full-size tow vehicle towing a full-size trailered boat, rather than for single passenger vehicles.

Thank you for allowing us the opportunity to submit our comments on this DEIR. We look forward to your responses to our submitted information.

Response to Comment PC406-1

The commenter first asserts that they were surprised by the “environmentally superior conclusion” related to Mole A in the Draft EIR, and cite to various engineering feasibility studies. The purpose of CEQA is to analyze changes caused by the project to the existing physical environment. CEQA is not designed to fix existing environmental problems or to factor in non-environmental considerations. (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”].) Furthermore, as noted in Section 4.6 of the Draft EIR, “there are different tradeoffs for each alternative and resource area.” The environmental analysis of the various boat launch alternatives is provided in Draft EIR Section 4.4.8.3; this analysis considered numerous resources areas, which were not considered in the comment (e.g., biology, air quality, greenhouse gas emissions, etc). Response to comments related to the proposed boat ramp, including previous studies, safety, use and access, are detailed in Master Response #8: Boat Ramp in King Harbor. While there have been many previous feasibility studies regarding tradeoffs for different boat ramp locations, many of these studies were discussing general planning concepts, and not providing CEQA analyses (i.e., CEQA documents focus upon changes in comparison to the existing physical environmental conditions, whereas planning studies simply provide discussion of benefits, which in many cases includes non-environmental considerations).

The commenter asserts that the “DEIR for the Mole C location does not include the above-referenced breakwall.” While one of the Mole C alternatives, includes a boat launch option without a breakwall (Draft EIR, page 4-301, Alternative 8, Mole C), the proposed project described in Chapter 2, includes a Boat Launch Facility at Mole C with a breakwall (Draft EIR page 2-61 [noting the proposed project includes a “420-foot long rubble-mound breakwater.”].)

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,” including reconfiguring parking and if necessary docks and hoist(s). As for the commenter’s statement regarding the Draft EIR data not seeming to include information on the time periods when one or both of these hoist was out of service or unavailable during normal operating hours, this is incorrect. Chapter 2, Project Description of the Draft EIR, page 2-20, with similar information provided in Section 3.12, Recreation (page 3.12-7), detailed the use of the hoists from 2012 to 2014, as well as described how since late 2014 the boat hoists had been inactive and shut down for safety reasons, with the repair of the north hoist reopened in October 2015. As for previous studies on trailered boat launches in King Harbor, Noble Consultants’ King Harbor Small Craft Traffic Assessment (Appendix L2 of the Draft EIR) provides an up to date assessment of small craft boating traffic in King Harbor.

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

COMMENT LETTER NO. PC407**MARCIE GUILLERMO**

Comment PC407-1

Please see attached document for comments. Would appreciate your acknowledgment you receive the document.

Also please provide supporting documentation necessary when addressing my questions.

I am writing to provide comments to the DEIR for the waterfront project in Redondo Beach. We must protect and enhance the waterfront amenities and health, not exploit it. The waterfront is not an appropriate site to build a movie theater, and have the type of retail CenterCal has done on almost all of its projects. A beautiful and healthy waterfront is a gift to the public. It must provide clean ocean water, clean air, adequate open space, less concrete, a harbor with its own marina, and more than enough water recreational sports and activities. As important, it is to ensure the ecosystem is preserved or enhanced, not destroyed.

I found the DEIR flawed and obviously it is biased document. Please I urge you to TRIPLE check the issues listed below and answer my questions. I also like to know if you have worked directly or indirectly for CenterCal in other projects? Who pays your salary at present, the City or Centercal?

Response to Comment PC407-1

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 commenter does not give specifics as to what in the Draft EIR was found to be flawed. 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.). Specifically, 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. The

Waterfront Draft EIR that was sent out for public review reflects the independent judgment of the City of Redondo Beach.

Comment PC407-2

1. **Blocking Views** - the report concludes that there is not significant impact to views. **The conclusion is further from the truth.** It ONLY shows a few viewpoints selectively chosen to show the best views through the MASSIVE retail project. I am pretty certain with that MASSIVE wall of concrete throughout the harbor, the views would significantly be affected and be UNAVOIDABLE. It is rather obvious the person in charge to evaluate the VIEWS conveniently selected views that would present the development in a positive manner. Please elaborate how these points to measure impact on views were selected and why not other points along the harbor, Torrance blvd circle, and along the project were not selected. Also, I would like to know if the person who did this evaluation, has he or she ever worked directly or indirectly for CenterCal? It is imperative that NO Views be blocked. I sometimes walk along Harbor drive on the side where Gold's gym used to be and guess what, I see the water from there. The project having buildings up to 45' tall along Harbor drive will definitely affect the views. I would like to request a count of all the existing views before and after the project. And see if possible, the increase in water views.

Response to Comment PC407-2

The commenter's opinion is noted. 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, which contains details on the view analysis and results of the Draft EIR.

Comment PC407-3

2. **Traffic** – It is bad as it is now around town, particularly close to the waterfront. And of course, this affects the surrounding neighborhoods. I only saw the 12,550 car trips per day for weekdays. I did not see a count and/or analysis for weekends and holidays and during the Summer time. I found that very disturbing, and I lost confidence on the consultants who did the traffic analysis and the consultants who did the overall DEIR. I would think that is critical. Would you please provide both counts and specifically between the peak hours? I will also specifically ask for the impact of traffic by the 700-seats movie theater during Summer time and weekends. How much traffic is generated by large heavy trucks such delivery trucks, trash, fire, etc. Making a few changes to turn lanes at already congested intersections, I don't believe will do. Furthermore, our roads tend to be for the most part very narrow. Perhaps placing the parking lots along PCH may help.

Response to Comment PC407-3

As shown on Table 3.13-11: Project Trip Generation Estimates in Section 3.13, Traffic and Transportation of the Draft EIR (page 3.13-42), the 700 seat movie theater was assumed in the Draft EIR 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." 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. For discussion of fire trucks/emergency vehicles, please see Response to Comment PC257-1.

As for weekend traffic, refer to Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project. Please refer to Section 3.13 and Appendix L1 of the Draft EIR for the detailed traffic analysis prepared for the project (including with cumulative growth). 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. The commenter also suggests providing off-site parking along Pacific Coast Highway (PCH). The closest portion of PCH is located approximately 0.40 mile away from the project site. For discussion of off-site parking, please see Response to Comment PC272-1. To the extent the commenter is referencing the Southern California Edison right of way, which is partially located adjacent to PCH, please see Response to Comment PC336-3.

Comment PC407-4

3. Parking – The NEW proposed parking structure footage square has not been included as part of the total square footage of NEW development, why? This is a parking structure of significant size and obstructs views and generates income. Is this an error? How many cars will the NEW parking structure hold?

Response to Comment PC407-4

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 parking information at the project site. 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, which contains details on the view analysis and results of the Draft EIR.

Comment PC407-5

4. Water Quality – I have not seen any study provided that indicates the water will be cleaner if the Lagoon is open. Who did the study? I have serious concerns having the Lagoon open and very close to that having the boat ramp. As you know, powered watercrafts disperse unhealthy residuals in the water. What studies have been done to ensure Redondo Beach can have the Lagoon open and next a boat launch ramp? Will Sea Lions be a problem? Will a lifeguard be present if the Lagoon is open? If so, who will pay for his/her salary?

Response to Comment PC407-5

Section 3.8, Hydrology and Water Quality of the Draft EIR detailed the water quality impacts associated with implementation of the proposed project. The analysis of water quality in Section 3.8 incorporated information from the *Water Circulation and Water Quality Impacts Memorandum* prepared in conjunction with the Draft EIR by Noble Consultants, Inc. (May 7, 2015), which is included as Appendix I2 of the Draft EIR. The water quality associated with the opening of the lagoon is addressed in both Section 3.8 and Appendix I2. Both Section 3.8 and Section 3.3 (Biological Resources) address concerns associated with sea lions. Please also refer to Master Response #4: Modifications to Seaside Lagoon.

Comment PC407-6

5. Access for Recreational Use - the project limits access for paddle boarders, kayakers, swimmers, and boaters. Why? We are a waterfront and we should use it for water recreational activities. If anything, we should consider adding other water sports and/or activities. Reduction of trailer parking is not cool. How do you address this reduction in parking?

Response to Comment PC407-6

Single vehicle stalls are proposed for parking at the small craft boat launch ramp facility that could be used by SUP and kayakers. In addition, the parking stalls located along the new main street and located within the park area would provide Seaside Lagoon access, including designated short-term parking for loading and unloading of other recreational equipment/supplies at the park (i.e., dropping off coolers, paddleboards, passengers, etc.), and handicapped access. Regarding trailer parking, please refer to Master Response #8: Boat Ramp in King Harbor and Master Response #7: Waterfront Parking.

Comment PC407-7

6. Safety – Who will pay for the salaries and retirement of additional police officers and fire fighters? What route the LARGE delivery trucks use?

Response to Comment PC407-7

Section 3.11, Public Services of the Draft EIR details police and fire services, which determined that the Redondo Beach Fire Department would be able to accommodate the proposed project without the provision of additional facilities and no construction of new or physically altered fire protection facilities (i.e., fire stations) would occur. The existing police sub-station on-site would be replaced with a new facility as an integral part of the proposed project, the construction and operation of which have been addressed throughout the Draft EIR. It is anticipated that the proposed project would generate a slight increase in the need for additional uniformed police officers and expanded service hours above existing (baseline) conditions, who would be stationed at the replacement sub-station. These police protection services would be provided through the continued implementation of the City's budgeting process. As detailed in Section 3.11 of the Draft EIR, the proposed project would not result in a significant impact associated with public services.

As for delivery trucks, 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. To the extent the commenter is referencing operational trip distribution, please see Draft EIR Section 3.13.4.1.1. for discussion of trip distribution. Based on the identified haul routes in Figure 9 of Appendix X, Truck trips are expected to use Pacific Coast Highway to Artesia Boulevard to travel north on I-405, and Torrance Boulevard to Hawthorne Boulevard to travel south on I-405. Beryl Street to Catalina Avenue would provide local access to the project site, and therefore would not use the same trip distribution pattern as the project would use in operation. To the extent the commenter is discussing construction trips, 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 (see Final EIR Chapter 3 for updated Appendix X-2 figures), 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.

Comment PC407-8

7. Noise – How was the noise associated with LARGE delivery trucks and busses measured? How does this impact the surrounding neighborhood?

Response to Comment PC407-8

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. Buses were analyzed as part of existing conditions.

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. The commenter's opinions and 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. PC408

CRAIG FUNABASHI

Comment PC408-1

I am writing to express my comments and concerns regarding The Waterfront Draft EIR.

My biggest concerns, in order, rest with the following key elements that are a part of the overall development of the Harbor Area:

1. Location of the Boat Ramp

2.

Opening Sea Side Lagoon to the harbor

3.

Keep the Fishing Pier/Sport fishing Businesses

4.

Pedestrian Draw-Bridge over Basin 3

5.

Overall New Developed Square Footage

1. I have read about and discussed up to 5 different locations around the Harbor that have been considered for location of the boat ramp. This seems to have narrowed down to 2 or 3 of those locations now, with one seemingly leading the statistics presented in the D-EIR. The best location for the boat ramp is at Basin B "Moonstone Park" and it is not even mentioned. This location places it adjacent to the Harbor Patrol Facilities - Close by if emergency services are needed. Also, away from the small craft launching from the lagoon at the Turning Basin and away from the natural hazards that exist at Mole A.

2. Opening Sea Side Lagoon to the natural flow of water in King Harbor is a good solution to answer the issues that exist with previous poor water quality and chlorination. This would also make it the key launch spot for

small hand-launched craft and stand up paddle boarders. The new lagoon could be expanded to include a water rental center on the spot now occupied by Joe's Restaurant.

3. The Fishing Pier and sport fishing businesses should be maintained in the new development in some size, shape or form. These are high value cultural and water front activities that serve the community and need to be preserved.

4. I like the idea of a staff operated pedestrian drawbridge that balances the needs of boaters having slips in Basin C. The unique novelty of this makes it an ideal waterfront attraction.

5. The mix of businesses between hotel, office, theater/entertainment, restaurant and retail seem reasonable, but if reduction of the developed square footage is necessary, the movie theater should be the first to be considered for elimination. Although it may be a piece of the puzzle in recreating a "downtown" feel, it is likely to be lowest on the list of significant water related businesses.

Response to Comment PC408-1

Regarding the analysis of alternative locations for the small craft boat launch facility a boat ramp, including Mole B, refer to Master Response #8: Boat Ramp in King Harbor and Section 1.3 of Chapter 1 of the Final EIR for a description of the Staff Recommended Alternative.

As for use of Joe's Crab shack location for a water rental center, this location is being proposed as the location of the small craft boat launch facility, which would not have space for a water rental center. However, rentals of small hand-launch craft is still anticipated to occur in the northern portion of the project site, including the Seaside Lagoon accessory uses described on Draft EIR page 2-56.

Regarding the Sportfishing Pier, 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 presented for review and consideration by the City's decision-making body.

COMMENT LETTER NO. PC409

RICK BECKER

Comment PC409-1

Just to clarify regarding my comments, please ask the developer and DEIR preparer how they will deal with the issues raised in my comments below.

Below please find my comments regarding The Waterfront Draft Environmental Impact Report, File No. 2014-04-EIR-001 and SCH# 2014061071 as of January 19, 2016.

Thank you for your time and consideration.

>1) Regarding hydrology and water quality, any replacement pier, or replacement portion of a pier, along the Redondo Beach waterfront should be constructed to match the highest elevation of the existing concrete portion of the Redondo Beach Municipal Pier (that being approximately 25 feet above the 'mean lower low water' sea level, which was determined in 1995 to be the necessary elevation). The old wooden portion of the Pier is currently about 20 feet above MLLW.

Response to Comment PC409-1

The southern portion of the Horseshoe Pier that would be reconstructed as part of the proposed project have been proposed to match the portions of the pier to remain.

Comment PC409-2

>2) Regarding geology and soils, in consideration of previous 1994 earthquake liquefaction in King Harbor including sand boils which formed in the Mole 'D' Seaside Lagoon area (NOTE this was in addition to damage which occurred at Mole 'B' during the 1994 Northridge Earthquake), all new structures should be designed in accordance with an approved soil report that recommends both sufficient soil preparation and specialized structure foundations to minimize future liquefaction damage.

Response to Comment PC409-2

As detailed in Section 3.5, Geology and Soils of the Draft EIR, Conditions of Approval (as part of its Conditional Use Permit procedures) would be applied to the implementation of the project through the project plans and the building permit process. The City is proposing COA GEO-2 that includes design and construction of the proposed project in accordance with California Building Code provisions associated with seismic design and engineering criteria (including recommendations in geotechnical reports prepared as part of the design process) to minimize potential risks to people and buildings/structures in the event of seismically-induced geological hazards (including liquefaction). This includes requirements for construction, grading, excavations, use of fill, and foundation work (including type of foundation and/or soil improvement requirements), including type of materials, design, procedures, etc. Such design and construction practices would include, but not be limited to, completion of site-specific geotechnical investigations regarding construction and foundation engineering. The design would incorporate measures pertaining to temporary construction conditions as well as long-term operational conditions specific to the project site.

Comment PC409-3

>3) Regarding utilities, the developer should construct all infrastructure to withstand future exposure to a harsh marine environment, more than minimum code requirements.

Response to Comment PC409-3

The commenter's opinion is noted. As detailed in Section 3.14, Utilities, and Section 3.5, Geology and Soils, construction of all utilities associated with the proposed project would be in accordance with all applicable codes.

Comment PC409-4

>4) Regarding public services, the developer should construct proper emergency access paths around the entire development for fire and police vehicles and equipment, plus install safety lighting and crime-prevention measures as part of the development.

Response to Comment PC409-4

As detailed in Section 3.11, Public Services, the proposed project includes a new main street that transects through the center of the northern portion of the site (approximately parallel to Harbor Drive), which would help circulation and emergency access through the northern portion of the project site. In addition, the proposed project includes the Pacific Avenue Reconnection in the area of the existing International Boardwalk. By

replacing the area in front of the International Boardwalk with a two lane (one lane in each direction) through street, the Pacific Avenue Reconnection would greatly improve emergency access and protection service throughout the project site.

In addition, the proposed project would result in 304,058 net new square feet of development, which includes the replacement of existing buildings that do not meet current fire code requirements with new construction that meets all applicable state and local codes and ordinances related to fire protection. 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. In addition to City police services, the proposed project includes private security that would serve the commercial development and hotel and would contribute to on-site safety on an around-the-clock basis. This would include foot patrols of building perimeters, parking structures, walkways, and surface parking lots and monitoring of on-site security cameras via closed circuit television. Working together, the private security would augment police surveillance and sub-station operations. As with the new/replacement police sub-station described above, the new development proposed under the proposed project would accommodate on-site private security, and no construction or expansion of facilities not already addressed as part of the proposed project would be required.

Comment PC409-5

>5) Regarding land use and planning, any new development should be accordance with the primary intended purpose of Basin III, that being use by commercial vessels, with appropriate uses including yacht sales, yacht charters, fishing boats, harbor tours, water taxis, and other non-resident berth use.

Response to Comment PC409-5

As detailed in Section 3.9, Land Use and Planning of the Draft EIR, and shown in Table 3.9-1, the proposed uses would be consistent with the City's certified Local Coastal Program.

Comment PC409-6

>6) Regarding recreation, there should remain as provided before the level of public access and water-related amenities, a heated public pool; a recreation facilities building, provisions for public recreational classes and opportunities including but not limited to sailing, paddleboarding, outrigger canoes, and fishing.

Response to Comment PC409-6

The proposed project includes an enhanced level of public access and water-related amenities. The proposed project includes the conversion of the Seaside Lagoon from a limited access pool to a year round swimming and recreational facility. The proposed project includes the creation of an enclosed recreation building (from what is now an open pavilion), as well as areas near the lagoon for public recreational events. A person wishing to launch a stand-up paddleboard or kayak would walk to the launch within the lagoon or directly launch from the lagoon's beach. Hand launching could also occur at the boat ramp (along the boarding floats). Fishing at the project site would continue to occur at the Horseshoe Pier near the Monstad Pier and from the Sportfishing Pier should it be replaced. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for discussion of fishing opportunities after implementation of the proposed project.

COMMENT LETTER NO. PC410**JULIE MOORE**

Comment PC410-1

To Whom It May Concern:

I am writing to oppose the CenterCal project as it now stands. As someone who chose to buy our home here 29 years ago, raise our children here and invest in our schools and local businesses, it is beyond me to understand why we would jeopardize our community and the jewel that Redondo Beach is by cramming a mall and massive parking structures on our beautiful oceanfront. A few of the many concerns with this mammoth project:

- Our beautiful ocean and beach view, our greatest asset, would be obstructed unless you want to shop or stay at a hotel.

Response to Comment PC410-1

To clarify, the proposed redevelopment of the project site is not a mall but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment 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. As for parking structures, the site currently has parking structures (Plaza and Pier Parking Structures), which the proposed project will replace one and add an additional structure. The proposed project (including the parking structures and hotel) would be consistent with land use policies and height restrictions. Please see the aesthetics analysis in Draft EIR Section 3.1 and Master Response #9: Views and Scale of Development.

Comment PC410-2

- Water safety is at risk due to the proposed new boat ramp location which is already the most concentrated boating area in the harbor.

Response to Comment PC410-2

Regarding water safety, please refer to Section 3.13 of the Draft EIR, Master Response #4: Modifications to the Seaside Lagoon, and Master Response #8: Boat Ramp in King Harbor.

Comment PC410-3

- Traffic is bad now and will be substantially increased. The decision will be to try to fight traffic to get to the beach or go elsewhere.

Response to Comment PC410-3

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.

Comment PC410-4

Where is the logic? We are relying on a developer with no ties to the city (or our ocean and beaches) to tell us what we need. We have a new mall at Del Alamo now and The Point is close by. There is boutique shopping in the Riviera Village, Manhattan Beach and Hermosa Beach. Why would you cram more shopping in the area

that makes Redondo Beach the unique beach community it is? Especially at a time that more of us rely on internet shopping? Perhaps it would be wiser to concentrate on filling the vacant businesses that are in Redondo Beach along PCH now.

Yes – revitalization is needed as well as maintenance along the pier. The responsible thing would have been to budget for proper maintenance on the pier as it was needed. The logical thing now to do would be to let responsible growth happen incrementally. Not to force a huge project on our beach community that once done, cannot be undone.

Response to Comment PC410-4

As for the projects ability to attract patrons, please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. As also discussed in Draft EIR Section 2.1.1.5.8, the proposed development on the site has already been significantly reduced from its first zoning proposal in 2007 [the original proposal included up to 750,000 additional square feet]. Nevertheless, a reduced project was analyzed in Chapter 4, Analysis of Alternatives (Alternative 7: Reduced Project). As also discussed in the City’s April 8, 2008 Administrative Report for the Harbor Pier zoning, “Pedestrian-active commercial areas generally require higher [Floor Area Ratios] 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.” This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles.

COMMENT LETTER NO. PC411

MICK HOGLUND

Comment PC411-1

It is of great disappointment to learn of the possibility of losing old Tonys on the pier. It is an historical icon and should be preserved.

Response to Comment PC411-1

Please refer to Section 3.4 Cultural Resources of the Draft EIR and Response to Comment PC312-1 regarding Tony’s On The Pier. 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. PC412

LISA SMOCER

Comment PC412-1

I was able to attend the community meeting about the DEIR on January 9th. I have a number of concerns about the impact of CenterCal’s Waterfront development on our community. As a homeowner and a longtime resident, I feel that our family will be negatively impacted by this project if it moves forward as proposed.

-Firstly, I’m concerned that pollution from demolition will be a major health hazard. There are many toxic chemicals including creosote, asbestos, lead, Naphthalene, PAHs and other chemicals that will be airborne and carried on the ever-present prevailing sea breezes. It should be noted that there are a significant number of residences in the area that have no air-conditioning so contaminants/particulate are likely to blow right into our homes through open windows.

Response to Comment PC412-1

As footnoted in Section 3.7, Hazards and hazardous Materials (page 3.7-5), the NOP/IS (Appendix A of the Draft EIR) determined that impacts associated with the routine transport, use, and disposal of hazardous materials (including asbestos and lead based paint) would be less than significant. While the construction of the proposed project would involve demolition and renovation of the existing on-site structures, which, due to their age, may contain asbestos and lead-based paints and materials, the removal of any asbestos-containing and/or lead-based paint materials would be required to comply with all applicable existing rules and regulations, including South Coast Air Quality Management District (SCAQMD) Rule 1403 (Asbestos Demolition and Renovation Activities), State of California Division of Occupational Safety and Health regulations and California Code of Regulations Title 14, Section 1532.1; therefore, asbestos and lead-based paint will not be addressed further in the EIR consistent with CEQA Guidelines Section 15063(c)(3) and 15128. Additional details about these requirements are included in Appendix A of the Draft EIR. Please see Draft EIR Section 3.2, for additional discussion of Air Quality, including but not limited to combustion of fossil fuels and release of criteria pollutants,

Creosote is considered a respiratory irritant and a carcinogen. However, if used with natural ventilation, respiratory protection is not required. Creosote is of more concern during coating than demolition as VOCs diminish quickly after the initial application. The majority of creosote coating is anticipated to occur off-site and therefore this would limit any potential exposure of off-site residences.

Naphthalene and PAHs are a constituent of diesel exhaust. Diesel exhaust is a complex mixture of thousands of gases and fine particles, including more than 40 toxic air contaminants. These organic and inorganic chemicals are adsorbed into the particulate matter and inhaled making diesel particulate matter the major exposure source for all diesel exhaust. Health effect from exposure to diesel exhaust were discussed in detail in the Draft EIR in Section 3.2.

Comment PC412-2

- Another major concern is the density and four-story building/parking structure facades throughout the project. This will completely ruin the seaside ambiance. You can see the negative consequence already if you look at the framework of the new Shade Hotel which dominates the oceanfront and the building next to it. If the whole development looks like this, the oceanfront will be destroyed. I believe you really will feel like you're at a shopping mall...The Grove at Redondo Beach.

Response to Comment PC412-2

Please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Master Response #9: Views and Scale of Development. To clarify, the proposed redevelopment of the project site is not a mall but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment 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. As also discussed in Draft EIR Section 2.1.1.5.8, the proposed development on the site has already been significantly reduced from its first zoning proposal in 2007 [the original proposal included up to 750,000 additional square feet]. Nevertheless, a reduced project was analyzed in Chapter 4, Analysis of Alternatives (Alternative 7: Reduced Project). As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher [Floor Area Ratios] 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." This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles.

Comment PC412-3

-A movie theater really does not at all seem like an appropriate use of rare oceanfront land in an major urban area. People sit in a dark, windowless room watching movies. So how does this dovetail with the public's access to the water, recreational use, etc.? Do we not have enough theaters in the area? If we need another one, there are a lot of other, more appropriate places, like a mall, where it could be built.

Response to Comment PC412-3

Please see Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site regarding the theater (e.g., specialty cinema). 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."

Comment PC412-4

-This development undermines numerous long-time, local (often family-owned) businesses which, in turn, undermines our sense of uniqueness of place and community. It is difficult to understand why those business interests haven't been guaranteed a place in the new development, especially, since it's so much bigger. This seems doable and should be a priority since most of the other new tenants are likely to be large, chain stores, coffeehouses and restaurants as only they can afford what is likely to be very high rents.

Response to Comment PC412-4

Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site.

Comment PC412-5

-The assessment of this development's impact on local traffic seems to be woefully inadequate. There are really only two east-to-west two-lane roads (190th & Torrance Boulevard) into this area. The only adjustments needed are a couple of turning pockets to accommodate an extra 12,000 car trips per day? This seems laughable. Additionally, the number of car trips will probable double during the peak summer months. The density of this project, as it's currently proposed will simply & completely overwhelm the infrastructure. I feel strongly that the density of The Waterfront should be scaled down significantly.

Response to Comment PC412-5

Please see Draft EIR Section 3.13, Traffic and Transportation, and Appendix L1, for a detailed discussion of 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. The Draft EIR included analysis of eight alternatives in Draft EIR Chapter 4, including an analysis of a "Reduced-Density" alternative (Alternative 7). Regarding the project's trip generation, please see Draft EIR Section 3.13.4.1. Please see Response to Comment PC412-2 for discussion of a reduced density alternative.

Comment PC412-6

-Furthermore, the amount of parking proposed is insufficient for the scale of the development. The location of a four-story parking structure proposed for Beryl & Harbor will also be a major eyesore and blocks sight lines.

Response to Comment PC412-6

Please see Draft EIR Section 3.13 for details regarding parking at the project site. In addition, refer to Master Response #7: Waterfront Parking. Please also see Master Response #9: Views and Scale of Development.

Comment PC412-7

I'd also like to point out that there will be additional development in the immediate area, on the AES site, for example. The cumulative impact of these two projects together will create a complete unsustainable environment over the long- term. Is it appropriate to approve this project as is without considering the larger context?

Thank you for your consideration of my serious concerns.

Response to Comment PC412-7

Regarding the AES Power Plant, please refer to Master Response #1: AES Power Plant Site.

The commenter's opinions are 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. PC413**ALFRED SATTLER**

Comment PC413-1

Here are my personal comments on The Waterfront Draft Environmental Impact Report (DEIR):

MM AQ-1 Line 6 on Page ES-36 has wording: "or engines that are certified to meet or exceed the NOx emission ratings for USEPA Tier 4 engines."

This should also specify "or engines that are certified to meet or exceed the PM emission ratings for USEPA Tier 4 engines."

This would make the improved phrase "or engines that are certified to meet or exceed the NOx and PM emission ratings for USEPA Tier 4 engines."

PM would have a greater local air quality impact than NOx.

Otherwise, the DEIR should discuss the health impacts of increased PM (Particulate Matter) for nearby residents, especially sensitive receptors like infants, the elderly, and those with breathing problems.

Response to Comment PC413-1

The health effects associated with Particulate Matter (PM) emissions were discussed on Draft EIR page 3.2-8. PM emissions associated with construction and operation were discussed on Draft EIR pages 3.2-38 and 3.2-39 respectively, and were determined to be less than significant. As discussed in Section 3.2.2.2.1 of the Draft EIR, the criteria utilized in the analysis take into account sensitive receptors, including children, the elderly, and individuals suffering from chronic lung conditions. Mitigation Measures are not required for impacts determined to be less than significant. (CEQA Guidelines Section 15126.4(a)(3).) Mitigation measure MM AQ-1 is incorporated into the project because the construction emissions for NOx exceed the regulatory threshold established for NOx emissions from construction activities. Therefore, the mitigation will remain as

written. Nevertheless, the City notes that in using Tier 4 engines, as discussed under MM-AQ-1 will still result in benefits associated with PM emissions (i.e., the USEPA Tier 4 engines are not specific to individual pollutants).

Comment PC413-2

AES-1, AES-2, and AES-3 are all significant.

This monster development will greatly decrease ocean views. The DEIR does not justify the addition of massive quantities of non-coastal-related facilities in the coastal zone, especially movie theaters and office space.

Response to Comment PC413-2

Please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Master Response #9: Views and Scale of Development in this chapter of the Final EIR. As also discussed in Draft EIR Section 2.1.1.5.8, the proposed development on the site has already been significantly reduced from its first zoning proposal in 2007 [the original proposal included up to 750,000 additional square feet]. Nevertheless, a reduced project was analyzed in Chapter 4, Analysis of Alternatives (Alternative 7: Reduced Project). As also discussed in the City's April 8, 2008 Administrative Report for the Harbor Pier zoning, "Pedestrian-active commercial areas generally require higher [Floor Area Ratios] 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." This is consistent with recent statewide planning efforts to increase development in areas well served by transit, pedestrian, and bicycle facilities (such as the project site), thereby reducing reliance upon personal motor vehicles. 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."

The commenter's opinions are 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. PC414

COX CASTLE NICHOLSON (ON BEHALF OF THE KING HARBOR YACHT CLUB)

Comment PC414-1

Attached please find the King Harbor Yacht Club's comments on the Draft Environmental Impact Report for The Waterfront Project.

This firm represents the King Harbor Yacht Club ("KHYC"), current lessee of premises located on Mole A. KHYC submits the following comment on the Draft Environmental Impact Report ("DEIR") for The Waterfront Project.

Alternative 8 in the DEIR analyzes three small craft boat launch ramp facility alternatives on Mole A as part of Alternative 8, which the DEIR maintains could be developed in lieu of the proposed small craft boat launch ramp on Mole C. KHYC occupies a significant portion of Mole A under a sublease with Marina Cove Ltd ("MCL"), which affords KHYC the right to exclusive use and occupancy of its leasehold premises on Mole A. KHYC has substantial improvements within its leasehold on Mole A, including its main club building, the King Harbor Youth Foundation facilities, dry storage and parking, and docks.

All three boat launch options involve constructing public facilities within the KHYC's leasehold premises on Mole A, which would interfere with KHYC's exclusive use and occupancy of its leasehold on Mole A. Each of the Alternative 8 boat launch proposals involve facilities that would interfere and would be incompatible with KHYC's use and enjoyment of its leasehold, which is not permitted under the terms of KHYC's sublease. In particular, the Alternative 8 boat ramps would require removal of some or all of KHYC 's existing drive aisles, parking, dry storage, and docks.

Because the Alternative 8 boat launch alternatives on Mole A interfere with and are not compatible with KHYC 's rights under its sublease, each of the Mole A alternatives is not feasible. The use of a boat ramp in the proposed location would be inconsistent with the current uses on the leased premises, and contrary to the lease provisions governing the premises.

KHYC and MCL are engaged in discussions to determine whether it is possible to relocate KHYC's leasehold premises in a way that would allow for Alternative 8, Mole A options to become feasible. KHYC and MCL have not yet reached such an agreement and there is no imminent prospect of achieving such an agreement. While KHYC and MCL continue to negotiate in good faith, they may not be able to reach an agreement that would allow the Mole A boat launch alternatives to become feasible.

Until such time as MCL and KHYC reach an agreement, the Mole A boat launch options in Alternative 8 are not feasible and should be addressed as such in the DEIR.

Response to Comment PC414-1

Marina Cove Ltd. (MCL) is the Master Lessee to the City of the water and land portion identified as "Mole A" being considered as an alternative site for a small craft boat launch ramp facility (within Alternative 8 of the Draft EIR) and that the King Harbor Yacht Club is an existing sublessee of MCL, which currently occupies portions of Mole A. MCL's comments on the proposed project is Comment No. PC349. Please see Response to Comment PC349-1.

The small craft boat launch ramp facility under the proposed project is at Mole C. Please refer to Master Response #8: Boat Ramp in King Harbor for additional information regarding Mole A.

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. PC415

JACQUELINE WARSTADT

Comment PC415-1

I would really like to see the small pier, home of Polly's and Redondo Sport fishing, preserved with a re-model and kept as an operating place of business for everyone, both young and "young at heart" to visit and enjoy!

The pier holds a special place in my heart, today and always will. After my son and I finished watching a beautiful sunset aboard the Voyager, on the evening of August 27,2011 we exited the boat and because Christopher had observed people fishing from the "small pier" he told me that he wanted to learn how to fish. He was 8 years old at the time. I told him we could walk over to see if anyone was available to give us information on how to get started. A really helpful man named Sam spent time with us, telling us all about the type of fish caught from the pier. He told us that a license was not a requirement for pier fishing. Told us the type of bait to use and other very helpful tips. We felt really good about the experience and could hardly wait to get started.

Moments after walking away from the pier, my cell phone received an influx of calls from family, trying to reach me urgently. I answered one of the calls and learned of my mother's passing away. I was in shock and in disbelief.

In the next couple of weeks to follow I found myself going back to the small pier. My son learned to fish. I sat quietly on one of the benches, wearing my sunglasses. I was hiding the tears that rolled down my face, from the continued overwhelming sadness, I was experiencing. I felt a sense of belonging here. It became a place of peace for me. Everyone was so helpful in teaching Christopher to fish and soon he was reeling in plenty of fish. I also learned to fish here and we were always encouraged by the locals, to keep fishing! We later worked our way up to the half day deep sea fishing boat, The Redondo Special where we made even more great memories and learned more skills from some very experienced fisherman. I cannot imagine the Redondo Harbor with the absence of the Sport Fishing Pier.

Polly's has been a wonderful experience too. Great food, friendly service and Terry always smiles at us. He too, has been encouraging of our fishing and always has our best interest at heart.

Please keep the pier as part of your Waterfront project.

Response to Comment PC415-1

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. PC416

DEAN FRANCOIS - FRIENDS OF THE SOUTH BAY BICYCLE PATHS

Comment PC416-1

We represent the many users of the bike paths including those traveling through the harbor. We are very concerned about the large size of the project and the routing of the Bikeways for the cyclist as they will be heading through the project area.

Working with the city, we have made great strides in bringing a bike path closer to the water. We worked for close to 20 years to bring the wall down at the Hermosa Beach border and attempt to bring the bike path off the street and into the harbor. We worked with the South Bay Bicycle Coalition and while we did not support the final design with cyclists next to the street, we support the goal of bringing a better coastal experience for the cyclist. The end result of this project works against this goal and creates more dangers by re-routing it on the back side of Pacific St. This is unsafe and illogical to what we should be doing in the marine environment. It is against the bicycle masterplan and against what the South Bay Bicycle Coalition as well has been working for.

Response to Comment PC416-1

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. Regarding the location of the bicycle path east of the Pacific Avenue Reconnection, due to site constraints, including width limitations and stability issues associated with the bluff and structures to the east, it is not feasible to engineer the roadway east of the bicycle path. Locating the bicycle path on the east is infeasible due to the substantial excavation and retaining wall construction that this configuration would require. Such construction if attempted has been determined to potentially place abutting properties at risk of slope failure.

Much of the proposed bicycle path is at a higher elevation than the roadway, providing separation from the vehicles and an improved view. See Response to Comment 416-4 below for additional information regarding safety associated with the bicycle path.

Comment PC416-2

The project and the DEIR violates the Local Coastal Plan (LCP) and The Coastal Act. This is especially prevalent with the requirement that development protect coastal views.

The project description and the assessed impacts in the DEIR are inadequate for the public to understand and evaluate. The City should take a look at this DEIR and its inaccurate and misleading representations, as well as the Proposed Project and its very adverse impacts.

Response to Comment PC416-2

As discussed in Section 3.9, Land Use and Planning of the Draft EIR, implementation of the California Coastal Act policies is accomplished through the City's certified LCP. Section 3.9 describes how the proposed project is consistent with the policies and development standards set forth in the LCP, including those related to coastal views. The commenter does not introduce new information that directly challenges the information presented in the Draft EIR. Please also see Master Response #9: Views and Scale of Development.

(5) Regarding the adequacy of the project description, 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 Draft EIR provides enough specificity under CEQA to evaluate the potential environmental impacts of the proposed project and alternatives.

The commenter does not introduce new information that directly challenges the information presented in the Draft EIR. Nonetheless, 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.

Comment PC416-3

There are many deficiencies in this DEIR and many other community groups such as the Sierra Club, BBR and Save Our Waterfront will be providing comments about this. Our comments focus mainly on just a few concentrating on the impact to cyclists, the public walking spaces, and ocean views. Please take careful consideration to the views expressed by these groups as well.

Response to Comment PC416-3

All comments received on the Draft EIR during public review period have been responded to; the comments and responses are provided in Chapter 2, Response to Comments within this Final EIR. See below for additional responses to the comments provided in Comment Letter No. PC416.

Comment PC416-4

Bicycle Paths and Bikeways

It appears that the end result of this project is that ocean and coastal views are severely and significantly adversely affected. The Proposed Project reroutes the South Bay Bike Path on Harbor Drive with serious safety

dangers from the edge of the Pier Parking Structure, from which cyclists have a view of the waterfront and beyond, to a strip on the eastern part of the project site between buildings and east of the new road connecting Harbor Drive to Pacific Ave., eliminating the existing coastal view.

This new route creates safety concerns. As bicyclists exit the hotel area at each end of this stretch, they must look across two lanes of car traffic and negotiate crossing the street twice. None of this was evaluated in the DEIR.

The DEIR states that "under existing conditions, bicycles must be dismounted and walked through portions of the project site." This is incorrect. Under existing conditions, bicycles must be dismounted and walked through just one very short stretch (less than 50 yds.), at the entrance to the Pier Parking Structure. It is obvious that this new route creates more obstacles and safety hazards than the existing route. After such work to get the route on the water side of the street, a proposal to route it back 2 times across the street is unsafe and this needs to be revised.

Response to Comment PC416-4

Please Section 3.1, Aesthetics and Visual Resource of the Draft EIR and Master Response #9: Views and Scale of Development. As described therein, view impacts were determined to be less than significant. No new information has been presented by the commenter relative to views that demonstrates that greater environmental than those identified in the Draft EIR would result.

Regarding views from the bicycle path, as addressed in Section 3.1, views from Harbor Drive would be reduced. This would for all users along Harbor Drive, including bicyclists. However, views along Basin 3 would largely remain for bicyclists. Additionally the enhanced boardwalk along the water's edge would provide improved access for bicycles, and would provide a close up view of the water.

Regarding quality of views from the segment of the bicycle path within the parking structure, see Response to Comment PC333-16.

Regarding safety, 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. See Response to PC333-16 for additional information.

Regarding the statement in the Draft EIR referenced that states "under existing conditions, bicycles must be dismounted and walked through portions of the project site." This refers not only to the designated bicycle route that traverse the project site, but includes other portions of the project site where bicycles are currently not allowed to ridden, such as the International Boardwalk. Therefore, this statement has not been revised in the Final EIR.

Comment PC416-5

In addition to these view and safety concerns with the re-routed portion of the bike path, the water views from the existing Harbor Drive Bike Path is significantly impacted under this project. The DEIR states that 80% of the water view from Harbor Drive is blocked.

This combination of these two impacts are devastating to the public even compared to the rather slim current condition. The analysis of recreation does not address bicycling as a recreational activity along Harbor Drive and the Proposed Project's impacts on the large segment of the population which we represent and participates in this. Given the data on the number of cyclists using the Harbor Drive bike path and along the waterfront,

there should be a section thoroughly addressing this, because the impacts are significant.

Response to Comment PC416-5

The commenter is incorrect that the Draft EIR states that 80 percent of the water view from Harbor Drive is blocked. As described in Section 3.1, Aesthetics and Visual Resources, the views of the water that are available from Harbor Drive are fleeting, narrow and of limited quality given the distance from the water, flat topography, and the presence of intervening features. Further, the water is not visible from all locations at Harbor Drive. See Master Response #9: Views and Scale of Development for additional information and photographs of the available views from Harbor Drive. Impacts associated with bicycle facilities were assessed in Draft EIR Section 3.13; please also see Response to Comment PC323-122. For discussion of the recreational thresholds, please see Response to Comment PC323-82.

Comment PC416-6

The boardwalk bike route is not wide enough to handle pedestrian and cycling traffic together. One would anticipate that bicyclists will be required to walk their bikes along much, if not all, of the proposed boardwalk, which significantly interferes with the coastal experience and with the vision of a continuous coast bike route. The DEIR fails to adequately study the safe width of such a route. 12 feet is clearly not enough, especially over a drawbridge. We would suspect that engineers would recommend 21 feet.

Response to Comment PC416-6

While 12-feet in width is the minimum width allowed under the code, the boardwalk 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 Redondo Beach Municipal Code. 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 PC416-7

Bikeway during construction

The DEIR indicates that the entire project area will be closed during the anticipated 2.5 years of construction. (3.12-32) This construction could turn into 3.5 years of a complete diversion for foot traffic and cyclists. Walkers and bicycle path users would be rerouted to Pacific Ave, Catalina, and Torrance Blvd. Circle, a route that diverges from the flat South Bay Bikeway to climb well up off the beach. No mention is made in the DEIR of the elevation change and how the thousands of cyclists traveling this route will then safely connect back onto the Bikeway. Nor is there discussion of any impacts to the thousands of walkers over this long period of time, particularly those who choose this route because it is flat. This is a significant adverse impact and should be discussed fully and mitigated by providing an alternative, temporary, level pathway wide enough to accommodate cyclists and pedestrians. This could be provided on the sides of the construction area or temporarily changed as construction needs permit.

Response to Comment PC416-7

Please see Response to Comment PC333-17 regarding the bicycle route during construction. Regarding providing bicycle access on the edge of the construction area, given the site constraints, this is not feasible

along the existing International Boardwalk/proposed Pacific Avenue Reconnection. Pedestrians would be able to use public walking trail that extends through the Village Condominiums east of the project site to cross from one side of the project area to other. This route has less grade change than the bicycle route. The potential inconvenience of individual bicyclists or pedestrians utilizing an elevated sidewalk/street around the construction site does not rise to the level of a significant environmental impact.

Comment PC416-8

Public ocean views

The project description does not provide adequate information to thoroughly evaluate the affect on public ocean views. The actual heights of the buildings and their elevations must be provided in order to determine the full impact on views, especially views of the water from public places such as Czuleger Park and nearby public streets.

Response to Comment PC416-8

Please see Response to Comment PC333-2 regarding the adequacy of the project description.

Comment PC416-9

“An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project.” CEQA Guidelines, § 15121(a).

The purpose of informing public agency decision makers and the public is not served if a DEIR or EIR analysis reflects bias or seeks to put conditions in the most favorable light to the exclusion of other information.

The DEIR analysis of aesthetic and visual resources is developer- biased in the choice of observation points used to analyze potential view impacts. The fact is views of the water from all public places in Redondo Beach must be evaluated in the DEIR. These include, but are not limited to views from Diamond, Beryl, Herondo/Anita, Carnelian, and Catalina streets, and Veterans Park, none of which were considered. We have provided attached 2 maps showing suggested observation points to be considered in the EIR. The attached "Redondo Street Map" shows suggested observation points to be considered from these streets and veterans park.

Response to Comment PC416-9

Please see Response to Comment PC333-3 and Master Response #9: Views and Scale of Development regarding the views selected for analysis in the Draft EIR. Response PC333-3 address views from Diamond Street, Beryl Street, Herondo Street/Anita Street, Catalina Street and Veterans Park as suggested by the commenter. Regarding Carnelian Street distant views of the ocean are available at the location suggested by the commenter. As shown in Photograph PC416-1 below from Carnelian Street near Juanita Avenue, condominiums to the west of Catalina Avenue and landscaping are faintly visible at the end of the street with the water visible beyond. The northern portion of the project site is immediately west of the condominiums, but the proposed buildings at this location would be at a lower elevation and have a lower height than the existing condominiums and thus would not be seen from this location.



Photograph PC416-1 – Carnelian Street southwest of Juanita Avenue

Regarding the additional viewpoint suggested by the commenter from Harbor Drive and Czuleger Park, see Master Response #9: Views and Scale of Development regarding how the views selected for analysis are considered representative views from these locations.

Comment PC416-10

The Proposed Project involves putting up buildings across virtually the entire project site. To say that this will not have a significant negative impact on the coastal experience and coastal views as people drive, ride their bikes, skate, or walk along Harbor Drive is incorrect.

Response to Comment PC416-10

The proposed project would comply with the floor area ratio requirement under the Coastal Zoning and the development cap for development within the Coastal Commercial zone, which limit the amount of development that could occur within the project site. Additionally, see Response to Comment PC333-4 and Master Response #9: Views and Scale of Development.

Comment PC416-11

The three observation points from the northern portion of the project site that were selected for the DEIR, views 4, 5 and 6, appear to be points from which the only three glimpses of the waterfront and horizon that will be available at all along Harbor Drive upon project completion--views through the three narrow corridors between buildings. Their choice by the DEIR as the "designated views" is an attempt to conceal, rather than reveal, the project's true impacts.

Response to Comment PC416-11

Please see Response to Comment PC333-4 and Master Response #9: Views and Scale of Development regarding the selection of views for analysis.

Comment PC416-12

On our attached "Map of King Harbor", we have designated where the observation points should be. One should pay particular attention to our points 1 and 2 as well as 4 in Czuleger Park on the hill. The Sierra club has gone to great lengths in their comments to support the fact that more observation points are needed and how this is violation of the coastal act and local coastal plan. If views such as these are blocked it will surely be appealed to the coastal commission. Although the commission ruled against the appellant right here in Redondo Beach, they did rule that all public coastal views need to be analyzed and not just from specific points, not just from public parks, not just from areas specified in a local coastal plan, but from all public views, even over private property. Our map shows other points on Harbor Drive that should be considered.

The Coastal Act and the City's Local Coastal Plan require that public views along the coastline, including from publicly accessible open space and Harbor Drive, be preserved and enhanced. The Harbor/Civic Center Specific Plan requires that building massing be broken up and minimize obstruction of ocean views. The DEIR states that "the addition of new design elements and improved public spaces will enhance the visual quality of the site". This does not make up for the loss of views. The Coastal Act protects their right to coastal resources.

Response to Comment PC416-12

Regarding the attached map of views suggested for analysis, see Response to Comment PC416-9 above. Regarding consistency with the LCP and California Coastal Act, see Response to Comment PC416-2 above and Response to Comment PC333-6. Regarding consistency with the referenced policy of the Harbor/Civic Center Specific Plan, see Response to Comment PC333-6 and Section 3.9, Land Use and Planning of the Draft EIR.

Comment PC416-13

Summary

As a minimum we believe that the DEIR needs to be redone and include more traffic analysis as we have noted. Especially the traffic interaction with cyclists. The DEIR needs to be expanded with many more observation points throughout public places where we currently have views of the water so that proper analysis is given to where we are losing water views. Specific elevations of buildings need to be made public to determine the affect on all visual aspects including water views.

With regards to the project we believe the proposed project needs to be downsized approximately 25 to 50%. The coastal act needs to be enforced and the project should comply with the act and protect existing public views of the water. This can be done with a downsized project. Buildings should be located in such a way that they are located in positions that replicate more of the current views that are blocked thereby preserving other views of the water, especially from harbor drive. Failure to protect water views according to the act could result in costly appeals to the coastal commission.

The proposed project needs to evaluate and revise the specified width of the public walkway/bike way that is routed near the water and travels over the bridge. For this to in any way work so that cyclists are able to enjoy a bike ride safely with minimal walking, 12 feet is clearly not enough to make this work. It should be more than 18 to 21 feet in width.

The proposed project needs to evaluate and reconsider the proposed routing of the Harbor Drive bike path. Sufficient engineering studies are needed. It should stay on the water side of the new Pacific Street as it does on the northern section of Harbor Drive. it needs to keep a more contiguous route with water views.

Crossing traffic 2 times in this short length is dangerous and unacceptable.

The proposed project needs to mitigate the disastrous effects of construction. It is unreasonable to think that bike and pedestrian traffic will be routed uphill around the back side of the village for nearly 3 years that could take longer. A temporary route should be made available during the construction zone. It is unreasonable to think that people will have to travel a route such as this for such a large time-frame. People will leave the Harbor and it will become a vacant ghost land during this construction unless this is mitigated.

Attached:

Suggested Observation Points-Map of King Harbor

Suggested Observation Points-Redondo Street Map

[For the map included in the comment letter, please refer to the PDF of the comment letter in Volume II of the Final EIR]

Response to Comment PC416-13

Regarding the traffic analysis, please see Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project, regarding bicyclists and traffic safety, see Response to Comment PC416-4 above. Regarding building elevations, see Response to Comment PC416-8 above.

Regarding downsizing the project, Chapter 4, Analysis of Alternatives of the Draft EIR includes an analysis of a reduced project alternative (Alternative 7).

Regarding the walkway along the water's edge, see Response to Comment PC416-6 above.

Regarding the bicycle path route along the Pacific Avenue Reconnection, see Response to Comment PC416-1 above.

Regarding the temporary route for the bicycle path during construction, see Response to Comment PC416-7 above.

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.

COMMENT LETTER NO. PC417

ARNETTE TRAVIS

Comment PC417-1

Congratulations on a job well done in terms of citizen engagement and explaining the EIR in easy to understand language for a project with many moving parts. Please continue to look for ways that the concerns expressed & suggestions made, are taken seriously and work to make the Waterfront Revitalization a reality!

Response to Comment PC417-1

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. PC418**LYNN GILL**

Comment PC418-1

We love going to Polly's on the Pier for comfort food, ocean air, and to watch neighbors fish. I have observed that many of the fisherpersons are "the least among us," and this outreach to provide recreation and put food on their tables must be preserved!

Response to Comment PC418-1

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. PC419**JOSEPHINE HRZINA**

Comment PC419-1

Here are my comments

I have been a Redondo Beach resident for over 40 years and a homeowner for the past 15 years.

I have many concerns about the proposed CenterCal project for the Redondo Beach waterfront.

The Draft EIR has stated that the CenterCal project has no significant environmental impact on the Waterfront.

From my personal observation, and opinion after attending many meetings, it appears to me that the CenterCal project has indeed many Negative impacts on the local environment.

#1 the already dense traffic on major streets leading to and around the waterfront (like 190th gong west, and P.C.H. ging north and south, will if what CenterCal proposes does happen, will increase this traffic by thousands of car trips daily (By the way, these trips may not generate all the money at the "Mall" that is projected (Look at the LB Pike)..... This huge increase in traffic will rouse major traffic congestion, which then, worst of all, will cause severe pollution to our present clean ocean air.

Response to Comment PC419-1

The commenter is incorrect that the Draft EIR found the project to not have significant environmental impacts. 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. For analysis of air quality, please see Draft EIR Section 3.2.

Comment PC419-2

#2 Also, in order to service the proposed “Mall” shops, delivery and garbage trucks rumbling through the area will add not only to air pollution, but greatly increase noise pollution.

All this will indeed have great significant impact on our environment.

Response to Comment PC419-2

The Draft EIR analysis did include delivery and service vehicles and their associated loading areas as presented in Section 3.10, Noise of the Draft EIR. Please see the operational analysis under Impact NOI-1 in Section 3.10 for additional details. Please also note that the City is proposing 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 air pollution, please see Section 3.2, Air Quality of the Draft EIR, which found operational air quality to be less than significant. Please see Response PC203-1 for additional details about the project’s trip generation, which was utilized in the roadway noise analysis.

Comment PC419-3

#3 The Sea Side Lagoon has been a safe, healthy place for families to enjoy our magnificent ocean. Opening up the Lagoon to accommodate boats moving in and out of the proposed area (now where is that Ramp??) ...will pose a danger and pollute the water with the gasoline runoff from the boats.. making it very bad for swimmers paddleboarders + surfers.

Response to Comment PC419-3

Section 3.13, Traffic and Transportation of the Draft EIR addressed safety impacts related to the proposed boat ramp and Seaside Lagoon. Please also refer to Master Response #4: Modifications to the Seaside Lagoon, which explains that the water currently utilized in the Seaside Lagoon originates from the ocean.

Comment PC419-4

#4 The proposed ”drawbridge” connecting the boardwalk from one side to the other over the passageway for boats is a “Snafu” waiting to happen. One breakdown on a busy day of boats and pedestrians would create chaos + congestion.

Response to Comment PC419-4

Regarding the pedestrian bridge, see Responses to Comment PC323-96 and PC375-3.

Comment PC419-5

This is significant impact. Hi-Rise parking structures blotting out views of the Pacific Ocean for people (Hmmm- those parked cars love that view ha!)

Response to Comment PC419-5

Your opinion is noted. Please refer to Section 3.1, Aesthetics and Visual Resources of the Draft EIR for the detailed analysis and Master Response #9: Views and Scale of Development.

Comment PC419-6

I would go on about the number of Bad Ideas within the CenterCal proposal that most certainly have significant impact on the environment—

i.e.: the tidelands

the ocean sealife

and fowl-life

the lack of truly

“open” spaces (not view corridors) for families to enjoy + picnic and play—

We, the citizens and taxpayers of Redondo Beach Do want Revitlization of the Waterfront.

We do want repaired parking structures

We do want to work with a Development firm that is up-front, forth-right and honest, and works with the ideas and desires of the community

*(These things CenterCal has NOT Been)

We want a comprehensive plan that addresses the needs of our waterfront.

One City, One Waterfront, One Plan

Response to Comment PC419-6

Chapter 4, Analysis of Alternatives of the Draft EIR addressed several alternatives to the proposed project, including an infrastructure only alternative (Alternative 2). The commenter has provided general comments on environmental issues that does not introduce new environmental information or directly challenge the validity of the information presented in the Draft EIR. For discussion of biological resource impacts, please see Draft EIR Section 3.3. 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. PC420**KAREN & NICK CULL**

Comment PC420-1

I am sorry to leave this to the last minute. I did try to attend one of the meetings but I came late and was only able to review the plans outside.

I have to say the I do think the project looks great - and I like the idea of the market hall. Like everyone else I am worried about the traffic and whether Redondo can sustain two malls, but on the whole I like the idea of

having a proper city center with a shopping area by the pier, a return to an older style of city and a movie theater I can walk to.

My issue is the Seaside Lagoon. As a family, (we moved here 10 years ago and plan to stay forever) we use the pier area a lot, we go to Tony's and Polly's regularly (please keep Polly's!!!!) and can be found in Ruby's most Tuesday nights. We go out on the Voyager a couple of times a year and often my husband and oldest son rent SUPs in the harbor. I don't because I am afraid of falling into the dirty harbor water.

We think the plan for the lagoon is not realistic, in that it doesn't really maintain anything that we love about the lagoon. We have had a summer family pass for 6 years. That's \$125 we pay the city every year. The kids love it - even the oldest who is a teenager now. What we love about it is that it is shallow, no waves so that the toddlers can really play with the sand and water. It is great developmentally. In fact our youngest who is 6 now taught himself to swim in the lagoon. There is a fence so you know they are there somewhere and lots of lifeguards. A mom can relax and maybe even read a book. Its the containment of the lagoon that makes it wonderful. I was down at the boat launch this week and there were really big waves crashing up against the rocks as well as a really high tide. I don't think this part of the harbor is really protected from waves and so not any more suitable for small children to play in than the beach. And if it is protected it's not going to be clean.

I know a lot of people thought that the lagoon isn't clean but that is not factually accurate they always make certain and test the water all the time. The standards that are required to put the water back in the ocean are not the standards required for bathing. But if you look at beaches like Mother's Beach in Marina Del Rey or Avalon Beach, you just cannot keep a clean beach next to a marina.

We know that the lagoon has to go - without the power station it just doesn't make sense. But for years when they discussed getting rid of the pool in the council they talked about making a community pool. I know there are hotel and gym pools but none of them are suitable for young kids. And young kids and young moms make a community - one that grows up with a strong bond. If the Lagoon opens this summer please go the first weeks in June or the last week in August - if the weather is good at 11 am midweek you will see the toddlers and their moms. Please consider that we need a pool - all year round would be better. It doesn't have to be by the waterfront - it could be in a park.

My kids are not toddlers anymore and can enjoy the beach and the ocean but are still all heartbroken that the Lagoon is going. I wish I could tell them that you will build a new pool for them to play in all summer and that it will be even better.

Where is the pool in the plan?

Response to Comment PC420-1

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.

To clarify, the proposed redevelopment of the project site is not a 'large scale mall develop' but is categorized as a mixed-use development including office and hotel with a retail, dining, entertainment 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. Please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site, for information on project viability and character of businesses at the site.

Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on sportfishing at the waterfront and Polly's. For discussion of Tony's, please see Response to Comment PC312-

1.

Regarding the plans for Seaside Lagoon, the detailed analysis is in Section 3.8 and Section 3.12 of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. The commenter's preference for a pool is noted and will be forwarded to the decision makers for their consideration, however, please note that an EIR need not consider every conceivable alternative.

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. PC421**DONNA LOPEZ**

Comment PC421-1

I know you are a busy woman who has a full agenda on upcoming projects but please be the voice to stop the closing of Fisherman's Wharf current businesses. I have great memories with the current shop, bars and restaurants, including having my engagement pictures taken there. Before hearing of the possible closing of Tony's, my friends and I were already planning celebrations for the year to be taken at the historic bar.

Please take this into consideration since so many families have traditions and memories that can never be recreated and having new business will destroy the spirits of many local who once called the pier their home away from home.

I have past many places that was once my family's Saturday restaurant or bowling alley or hang out spot only to be replaced by new big name companies in which I refuse to step foot in. Breaks my heart that small businesses with so much to give will be no more. Its a slap in the face for locals.

The current businesses in the pier such as Tony's brings character to Redondo Beach. It has history and makes the city stand out from other such as Santa Monica and Long Beach. With out that, Redondo Beach will just blend in and be ignored.

I hope you hear what the people, and I mean locals not the big corporation, have to say. After all, they are the one's that will bring business.

Response to Comment PC421-1

Please refer to Section 3.4 Cultural Resources of the Draft EIR and Response to Comment PC312-1 regarding Tony's On The Pier. Please refer to the Master Response #5: Sportfishing Pier, Polly's and Sportfishing for information on sportfishing at the waterfront and Polly's. Regarding the proposed development, please refer to Master Response #3: Economic Vitality and Compatibility of Businesses at the Project Site. 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. PC422**RICHARD DAVIES**

Comment PC422-1

I was happy to hear that King Harbor might be getting a boat ramp. I'm one person that can get use out of it, I have had trailer boats a good part of my life. My formal boating experience starts when I was in the US Navy. My assignments included operating small assault boats up to 56 feet in length, and navigational duties on large ships. I have worked for Ocean Science and Engineering, a Long Beach firm, and General Oceanographic

operating their support ship and piloting their submersibles while performing feasibility studies for oil companies and universities.

I also have worked for Pete Peterson who has worked up and down the coast for many years. He had the contracts for the maintenance of the Queen Mary in the Port of Long Beach. I was an inspection diver for the Port of Long Beach under these contracts. In short I have spent a lot of time in, under and around the water and have a lot of experience to draw from.

I have reviewed all the proposed sites. I first looked at mole D. Will the hoists remain along with the proposed new boat ramp? This site had good traffic flow in and out. Next, I looked at mole C and felt that this was a better location. It has easier access from Harbor Drive to Portofino Way, with straight access into mole C.

All proposed sites lack suitable parking spaces. I contacted Marina Del Rey and found that they have 223 pull-through spaces, each will accommodate a length of 50 feet.

The twenty to forty spaces that you have allotted at each of the proposed sites are not enough.

Records from the Department of Beaches and Harbors at Marina Del Rey indicate that on a busy weekend they have more than half of the 223 pull-through spaces filled. On holiday weekends, like the 4th of July, almost all are filled.

Fishing and diving along the Palos Verdes shore is excellent. When a ramp is available at King Harbor, trailer boaters will come here to launch instead of going to Marina Del Rey or San Pedro. Have you done a feasibility study on ramp usage?

One of my questions, for what length of boat were these proposed ramps designed? An average truck is 18 to 22 feet long, boats can be up to 30 feet long. 30 foot boats are the maximum length that the current hoist can accept. If the hoist is to be removed, these boats will launch at the proposed ramp. The proposed turning radius of 60 feet would be impossible to negotiate with a rig of maximum length.

After looking at the three proposed sites (A, C and D), I am baffled. Was a feasibility study concerning accessibility to and from the ramps performed? If so, who was the consultant who performed the study? I have owned trailer boats all my life and used boat ramps up and down the coast. None of the alternatives are well planned and the Mole A location is by far the worst from a safety, traffic and access point of view.

After looking at all the alternatives I came to the conclusion that Mole C is the best option. Mole C has easy access and a very wide access road. It is twice the width of Yacht Club Way and it could be widened to accommodate a lane for boats waiting to be launched.

On a point of safety. The proposed ramp is directly adjacent to the main Breakwater. Even in calm conditions waves frequently break over the wall. There are number of families who fish and picnic on the breakwater. If public access on Mole A is made more attractive by including a park and restrooms, how many more persons will be swept off the Breakwater? The breakwater will become more of an attractive nuisance and liability.

During storms the area of the proposed ramp and parking lot has been awash and the breakwater has been damaged. In very stormy conditions access to the Mole A area will have to be closed, as happened in January 2016. Does the coastal commission want a part time boat ramp?

I respectfully await your answers.

Response to Comment PC422-1

Please refer to Master Response #8: Boat Ramp in King Harbor, which includes discussion of the parking demand at the Marina del Rey boat launch facilities. Please also note that the Mole A boat launch alternative does not include a park or restrooms. 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. PC423

DONNA DUNCAN

Comment PC423-1

Why is Center Cal's current plan another "piece meal" concoction? Redondo has a history of piece meal efforts, so why not try to get it right this time?

Firstly, we don't need another HOTEL! I'm okay with the Shade Redondo going in, but we certainly don't need another hotel in such close proximity (Center Cal's plan).

And my biggest concern is that the AES Building is still there...being an ugly eyesore and will look even worse if Center Cal builds all of this lavish "stuff" nearby. CAN'T THEY SEE THE BIG PICTURE?

Parking structures above the ground? Who wants to go to the beach and look at a bunch of cars?

If they want to be so "glamorous" and make a lot of money, why not put cabanas, lounge chairs and table side services on the sand like the pool side amenities that they have in Las Vegas?

Regarding the AES Building, my idea is if it stays, why not turn it into a live concert venue and huge dance floor? Now that's a money maker, plus nobody really wants to drive to Hollywood or Orange County or even downtown Los Angeles for an evening of Rock & Roll. Now that's something that the beach cities could really use. And as for the "noise" that residents complain about, that could be remedied and contained in that oversized, giant building. You could even put in a parking lot with valet available and charge big bucks to park there. Since everything comes down to money, and if they wanted a fast return on their investment...that's the meal ticket!

This is still a beach city and would it be more appropriate to offer more seaside options and activities instead of mall type shops and restaurants? Besides more restaurants will just create more obesity instead of body surfing or paddle boarding which are healthy beach activities.

Thank you for your interest in these matters.

Response to Comment PC423-1

Please refer to Master Response #7: Waterfront Parking regarding parking at the site. Regarding the AES Power Plant, please refer to Master Response #1: AES Power Plant Site. The objective/goal of the proposed project is to 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. In addition, the project would 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.

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. PC424**TRAVIS BECKETT**

Comment PC424-1

I'm hoping you can briefly map out the complete approval process for the proposed Waterfront project after the EIR is certified by the city council? Will they need to go before the Harbor Commission, for instance?

Response to Comment PC424-1

Draft EIR Table 1-1 and Section 2.6 provide an overview of the entitlement process, including the various Redondo Beach Departments, including the Harbor Commission. Additionally, on June 2, 2016 the City published in the Easy Reader a Notice of Public Hearing before the Harbor Commission, which includes an overview of the entitlement process.

COMMENT LETTER NO. PC425**MARK L. HANSEN – KING HAROR
BOATER'S ADVISORY PANEL**

Comment PC425-1

The boating community has identified a significant number of omissions and errors in the DEIR, as it regards the Alternatives for the Public Boat Launch Ramp ("Boat Ramp").

Wave and Storm Safety Issues

In the "Analysis of Alternatives", pages 4-295 and 4-296, the DEIR states:

"Waterside constraints include adequate space for the ramp and vessel maneuvering, navigational safety, and wave and surge exposure."

"four possible locations were identified as potential locations for a boat launch ramp facility, considering navigational safety, site constraints... and other factors such as typical wave patterns and storm conditions."

The DEIR then further acknowledges that, of the four possible locations, only

"Mole A is located along the North (Outer) Breakwater at the existing King Harbor Yacht Club."

However, the DEIR then actually fails to ever address these safety issues.

Mole A has been the site of significant storm damage over the years. The 1988 storm damage to the existing yacht club was over \$300K, inflation adjusted to over \$600K.

Mole A and its immediately adjacent breakwater have been the site of various wave-caused injuries, including broken bones. There have also been occasional deaths along the breakwater.

As recently as Thursday, January 7, 2016, large waves crashed onto Mole A, resulting in damage to the parking lot, and one injury. This was covered by the local news media:

<https://www.youtube.com/watch?v=1yYbA080dC8&feature=youtu.be&app=desktop>

<https://www.facebook.com/443950885813802/videos/475145172694373/>

With the anticipated sea level rise and increased El Nino events, the intensity and/or frequency of large storm wave events is anticipated.

The yacht club removes its rigging docks from the water every year, from December to April, in order to avoid the inevitable damage. The City Staff apparently did not realize, until they were recently advised, that those docks are removed every winter season.

A Boat Ramp on Mole A is simply not feasible as a year-round public boating access facility. Responsible management of a public boat ramp on Mole A with regard to public safety would require closing the Boat Ramp during the winter months when significant wave action is most likely to occur. To close the Boat Ramp for four to five months of the year would reduce the Boat Ramp to a seasonal amenity, which is inconsistent with the project objectives specifically related to public recreation that call for “reducing seasonality” and “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” These objectives call for year round recreational opportunities, which is not viable on Mole A. . There are no ‘seasonal’ boat ramps in Southern California. A safe year-round boat ramp can be constructed at the South Turning Basin, as confirmed by both previous and recent engineering studies.

Closing the Boat Ramp during the winter months would still not address the threats to public safety resulting from rogue waves that are known to occur on Mole A throughout the rest of the year. On calm days, with no waves breaking over the breakwater, there are rogue waves, which cause considerable damage, and will injure anyone near the breakwater on Mole A. In our experience over many years of observation, most of the injuries actually result from rogue waves that occur on moderate to relatively calm days. Moderate wave days turn Mole A into an attractive nuisance, as members of the uninformed public stand under the waves for entertainment. When a somewhat larger wave arrives, we have another injury.

The King Harbor Yacht Club has been able to safely exist on Mole A because the Club has 50 years of experience at on Mole A. Each generation of club boaters passes down the expertise and discipline to not allow their members, children, or guests near the wall during large waves, or *EVER* onto the breakwater. This is even codified into the club policies: “*climbing on the rocks adjacent to the Club premises is prohibited.*” As we have observed many times over many years, the public generally does not have the experience and knowledge to manage the risks that are inherent on Mole A.

The RB City Municipal Code, Section 12-1.3158 also recognizes this danger and technically prohibits access to the breakwater. However, the rocks are actually federal property, so this is only periodically enforced. As recently as last November, for that one month, the Harbor Patrol statistics reflect three (3) Rock Rescues.

The Small Craft Traffic Assessment, page 2, acknowledges:

“a series of interviews with Harbor Patrol staff who provided information based upon their many years of personal observations, local knowledge, and experiences.”

Presumably the Harbor Patrol opined on the location of the boat ramp and the safety considerations. The certifying authorities would benefit from that expert input; however it is not provided.

The rocks and wall at Mole A are already an attractive nuisance with a history of wave-caused injuries. If a boat ramp, with public docks and public restrooms, were constructed there, there would be a dramatic increase in people on or near the breakwater and a proportional increase in injuries.

With the City now fully aware of the inherent risks to public safety on Mole A, it would be irresponsible for the City to continue to pursue the Boat Ramp on Mole A. The Boat Ramp alternatives on Mole A should be removed from consideration as an Alternative to the proposed Public Boat Launch Ramp project on Mole C. To construct a Boat Ramp on Mole A with knowledge of the risks to public safety would expose the City to liability for the injuries that will inevitably result from bringing the public to a Boat Ramp and related public amenities on Mole A.

Page 4-296 relays that:

“Mole B was eliminated from further consideration.”

“Mole B could result in potential significant impacts on emergency services, by disruption of ingress and egress for land vehicles from Fire Station 3/Harbor Patrol Headquarters and use of the helipad at Mole B.” (*A lone Tahoe truck is kept on Mole B.*) (*The current Mole B Master Plan anticipates the much lighter Outrigger Canoes coexisting with the helipad.*)

If Mole B was eliminated from consideration due to these more modest safety concerns, then certainly Mole A should be eliminated from consideration due to the clear direct danger of injuries.

(Mole B would obviously be inferior to a South Turning Basin location with its maneuvering water.

Small Craft Traffic

The DEIR fails to acknowledge the prior expert consensus on the South Turning Basin as the best location for the Boat Ramp, due to its maneuvering water and direct access to the harbor entrance.

The 1989 ‘DMJM’ Engineering Study analyzed four locations and concluded that the site at the South Turning Basin ‘compares most favorably to the sites examined.’ It noted that a ramp here “probably has the least impact on traffic”, and that this alternative “can be made to provide an efficient, well-integrated launch ramp operation.”

For fifteen years, the King Harbor Boater’s Advisory Panel has recommended, in part, a

“Public Launch Facility as a Ramp Adjacent to the South Turning Basin, consistent with the Guidelines of the California Department of Boating and Waterways.”

City Staff Reports to both the City Council and the Harbor Commission have consistently reported that:

“Studies have been conducted in the harbor to identify potential locations for a ramp, focusing primarily on the South Turning Basin.”

The DEIR paraphrases the first part of this statement, but somewhat conspicuously omits the reference to the South Turning Basin.

For many years, both the engineering experts and the boating experts have concurred that the boat ramp should not launch into a basin/marina, not launch into the main channel, and should utilize the maneuvering water of the South Turning Basin, as a staging area for egress and ingress.

The Small Craft Traffic Assessment, on page 7, contends that:

“Location of a launch ramp at Mole A is considered to not have significant impact on existing harbor traffic since the site is located near the end of the main navigable channel where traffic volume is lowest.”

This is highly inaccurate, as this area is at the intersection of the main channel with a large basin and most often has the *highest* traffic volume in the harbor. It is the site of activities for the following:

- King Harbor Yacht Club: Most concentrated boating in the harbor
Hosts most of the larger harbor events in the harbor
- King Harbor Youth Foundation: Largest training program in the harbor
Dozens of youth in training
- Outrigger Canoe Clubs (2): Forty-foot canoes launching perpendicular to the main channel
- Redondo Beach Yacht Club: Group Egress/Ingress for regattas
- Tarsan SUP: Egress/Ingress for dozens of Paddleboards

The Small Craft Traffic Assessment, on page 6, contends that:

“The Mole C and D launch ramp sites are situated within the Turning Basin...Construction of a protective breakwater at the Mole C site may impact water traffic patterns and increase the potential for conflict with paddle and hand launch craft emanating from Seaside Lagoon.”

“we believe that potential conflict between boaters and paddle craft at the Mole C BLF site can be best avoided by deleting the fixed breakwater component.”

The DEIR fails to acknowledge that the engineers of the Boat Ramp Feasibility Report had previously advised that the protective breakwater was required:

“the wave height should be below 1.0 feet on an annual basis, and 1.5 feet for a 100-year event.”

The DEIR also fails to acknowledge that two Boat Ramp and Lagoon Design meetings were held in February 2014, and that the engineers reported that the most well received, preferred design included:

“The reversing of the existing hook breakwater provided a distinct physical barrier between the launch ramp and lagoon users.

The DEIR also fails to acknowledge that the Executive Director of the LA Maritime Institute has met with the Waterfront Developer to initiate discussions on bringing a Tall Ship into the project and that the Tall Ship’s placement could potentially serve as a barrier between the boat ramp and the lagoon.

The DEIR fails to acknowledge that only the Mole A Alternatives would require all boat ramp users to traverse the entire length of the harbor for every egress/ingress.

The DEIR fails to address that the water to the immediate east of the breakwater, near Mole A, silts in, making it un-navigable and a hazard to boaters without local knowledge.

Transportation Traffic

The Transportation Impact Study, page 79, reports and acknowledges that:

“Five signalized intersections were evaluated because they represent the locations that would experience the most variability between the boat launch ramp alternatives.”

“There is negligible variation in operating conditions between the alternative locations and the Project.”

The DEIR fails to acknowledge two very important landside traffic benefits, regarding access from Portofino Way versus access from Yacht Club Way:

Yacht Club Way cannot be widened to accommodate a 'cueing lane', or a reasonable width for emergency vehicles, or head-to-head car/trailer passing. However, as the Waterfront Project is a blank sheet project, Portofino Way can very easily be widened to accommodate a 'cueing lane'.

The Herondo/Harbor Drive/Yacht Club Way intersection presents a jog, with a short turning lane, followed by a tight right turn, that requires cars with trailers to swing wide into oncoming traffic.

However, Beryl proceeds straight into Portofino Way, and both the northwest and southwest corners can easily be rounded as necessary to accommodate cars with trailers.

Biological

Page 4-338 reports that:

“under the Alternative 8 options, the location of the boat launch ramp would vary, no breakwater would be constructed...”

As noted, the DEIR fails to acknowledge that the engineers of the Boat Ramp Feasibility Report had previously advised that the protective breakwater was required:

“the wave height should be below 1.0 feet on an annual basis, and 1.5 feet for a 100-year event.”

The chart on page 4-340 shows that the proposed project's break wall, around the boat ramp, would convert 67,669 sq. ft. from soft bottom to hard bottom habitat. On page 4-428, this apparently resulted in all of the Alternatives being scored significantly superior to the project, implying that the soft bottom was superior to the hard bottom.

However, numerous excerpts from the Biological Resources Assessment indicate that scientific observations strongly conclude just the opposite:

The harbor bottom habitat is primarily unvegetated soft bottom comprised of both mud and sand dominated conditions. (p42) Invertebrates were sparse...(p43) The King Harbor soft bottom marine communities do not support sensitive species and are not considered rare as a habitat type. (p60)

A focused survey for eelgrass was conducted and no beds were located in April 2014 or expanded surveys in March 2015. (p47) No sensitive marine habitats (e.g.) eelgrass are present in the project footprint and therefore impacts would not occur to these resources. (p64)

In the case of conversion of unvegetated soft harbor bottom to hard harbor bottom...the expected short-term effect would be loss of benthic marine organisms in the work footprint, with the rapid recolonization of the area by new organisms adapted to the replacement hard bottom. (p59)

The change is expected to result in an increase in primary productivity... The rock also would result in increased structural complexity [and] enhanced fish utilization... (p60) The placement of riprap would be expected to provide an increase in site structure over the bare bottom conditions and would result in increased productivity and diversity compared to mud bottom habitat. (p64)

Therefore, if the scoring on page 4-428 is to be consistent with the numerous scientific observations in the

Biological Resources Assessment, the scoring must be completely reversed, to show the ‘Project’ as the environmentally superior alternative, and to show Mole A as the most environmentally inferior alternative.

Air Quality and Greenhouse Gases

Page 4-428 scores the ‘Project’ as being environmentally inferior to Mole A and the other Alternatives, apparently because of construction of the protective break wall, but also because the DEIR accounted for the demolition of Joe’s Crab Shack in the Project, but presumed that, on Mole A, the yacht club would remain in place.

Again, the DEIR fails to acknowledge that the engineers of the Boat Ramp Feasibility Report had previously advised that the protective breakwater was required in a Turning Basin Alternative.

“the wave height should be below 1.0 feet on an annual basis, and 1.5 feet for a 100-year event.”

Additionally, since the original publication of the DEIR, a review of the required parking has revealed that the boat ramp and the yacht club will not both fit on Mole A, so the clubhouse, which is equivalent in size to Joe’s Crab Shack would also need to be demolished.

This latter reality will affect the relative scoring of Mole A versus the Project and other Alternatives.

Impact on Coastal Dependent Yacht Club

Page 4-305 reports that:

“Both Mole D Option(s)...are centrally located and as such would disrupt the proposed design of the project site as a “village concept” that links the northern and southern portion...”

Page 4-301 reported that:

The existing KHYC facilities would be reconfigured to accommodate any of the Mole A boat launch ramp facility options.

As noted, a review of the required parking has revealed that the boat ramp and the yacht club will not both fit on Mole A, so the clubhouse would need to be relocated. If the club was relocated to an inferior location, the result could be the potential displacement of a coastal dependent use to accommodate non-coastal dependent uses.

The overall recreational vibrancy of the harbor could be harmed, as the club serves as the host for many of the premier activities and events in the harbor, including:

Holiday Boat Parade
Sea Fair
Opening Day
Cure Cancer Regatta
KH Youth Foundation
Sea Scouts
US Coast Guard Auxiliary
Coast Guard Cutter Visits
Tall Ship Visits
Blue Water Safe Harbor
Recreational Demand

The Small Craft Traffic Assessment, page 4, reports that:

“The peak number of monthly launches reduced from a high of 784 in July 1997 to 160 in August 2014.”

However, the engineer’s Feasibility Report of March 2014, estimated that:

“Total launches per year are estimated at up to 16,480 given the limitation in adequate parking may only support considering 2 boat launch lanes for demand estimating purposes.”

The ramp will be much more popular than the existing hoist with its limited hours, difficulty of use, and poor location. The egress from Basin 3 is narrow and silts in. Egress is also upwind and wind-shadowed, making it very difficult for sailboats without auxiliary power. Small boats must share the small basin with large commercial traffic.

The “California Boating Facilities Needs Assessment” emphasizes that the overwhelming reason that boaters use a given facility is its proximity to their home and boat. Redondo Beach is centrally located between Marina Del Rey with eight (8) lanes and Cabrillo Beach with four (4) lanes. Most boaters that live closer to Redondo Beach will utilize our ramp.

Page 4-296 reports that:

“Each of the boat launch ramp facility options include either one-lane or two-lane ramps with 20 or 40-stall parking lots.”

However, the DBW Design Handbook for Small Craft Launching Facilities advises that:

“Generally, single lane launching ramps are not practical... They can be difficult to use because of their narrowness, particularly for the inexperienced boater.”

“The typical minimum parking requirement per launching lane is 20-30 car/trailer spaces.”

The City should not design to the minimums of the minimums.

Public Outreach

In November 2014, the City Council approved a contract with Noble Consultants, which included:

“2.3 Public Outreach

Consultant shall assist the City to conduct up to three public and Commission meetings with stakeholders and the public to review alternative boat launch plans and solicit comment for further consideration.”

It was somewhat surprising when the City chose to move forward with the DEIR, without first availing itself of the expertise of the boating community. The DEIR would have been more complete and accurate.

Methodology

Although the public can add up the charted scores on pages 4-428 and 4-429, to achieve the rank and score of the Alternatives, there appears to be no clear published underlying methodology for achieving those underlying scores. Absent a clear methodology, it must be assumed there is a significant level of subjectivity in assigning those underlying scores.

Conclusion – Feasibility, Rank and Score

When all of the identified omissions and errors are reviewed, it should be determined that the Boat Ramp on Mole A is not a feasible year round public amenity, does not meet the project objectives related to public recreational amenities and has potential environmental impacts that would be greater than the proposed project. Therefore, Mole A should be eliminated from consideration as an alternative to the proposed public boat launch ramp on Mole C.

Response to Comment PC425-1

For response and information associated with comments on the boat ramp, breakwater, and transportation, please refer to Master Response #8: Boat Ramp in King Harbor. The commenter asserts that a boat ramp at Mole A would be inconsistent with the project objective of reducing seasonality, because the commenter asserts such a boat ramp at Mole A would be closed four to five months of the year.

The commenter appears to be referencing the first project objectives in Draft EIR Section 2.2, which reads in part:

Optimize the full potential of approximately 36 acres of Redondo Beach Waterfront (see Figure 2-3) 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.

The concept of reducing seasonality first arose when the City was discussing the zoning for the project site. 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... a key to revitalization is the ability to expand hotel/hospitality offerings and to smooth out the seasonality of activity... If the Harbor area is to be revitalized as a year-round asset, the uses that will need to be focused on are hotels..." Similarly, the City Council's report state "...that expanded hotel and hospitality uses and offices are an important component of revitalization of the Harbor and Pier area. These uses smooth out the seasonality of activity and provide the day-time and year-round population to help provide for viability of other restaurant, retail and service uses."

As noted above, the concept of reducing seasonality was focused upon providing a cohesive "mixed-use environment" which is focused upon daytime and year round population. As noted above, this was largely addressed by providing uses such as hotels and hospitality uses, as well as other uses that are not necessarily fully dependent upon weather and ocean conditions (e.g., uses which can be utilized and enjoyed during cold/stormy weather). Furthermore, while some boat launch users will likely utilize other uses when entering or existing on the project site, these users are not anticipated to provide a large "daytime...population." Furthermore, different uses will have different levels of interests throughout the year; the concept of reducing seasonality was focused upon providing a *cohesive mix of uses* that complement one another. This does not mean that a single use is inconsistent with this project objective if it is not accessible every day of the year. Furthermore, the City does not believe that a boat launch location at Mole A would be closed for four to five months of the year, as suggested in the comment. Unlike the King Harbor Yacht Club facilities, the boat launch facility would not include "rigging docks" which need to be removed during stormy weather. Please see Master Response #8: Boat Ramp in King Harbor for additional discussion.

The commenter incorrectly infers that the boat ramp would include public docks and public restrooms: this is not the case. As for the need for a breakwater for the proposed boat ramp that the commenter throughout the letter indicates is required based on previous studies, the feasibility studies for the boat ramp have included this

feature as part of a “best case” scenario; however, as noted by staff from Noble Consultants Inc. (Mr. Jon Moore) at several boat ramp public meetings, a boat ramp in King Harbor could be constructed (one or two lane) without a breakwater and with extra heavy duty construction that could require additional boarding float maintenance than a dock/ramp with the breakwater.

The commenter states that “The DEIR fails to acknowledge the prior expert consensus of the South Turning Basin as the best location for the boat Ramp.” The purpose of the EIR is to analyze the environmental impacts of the proposed project, not to provide a comparison of the benefits of each project component. As discussed in Response to Comment PC406-1, these prior planning studies are not CEQA analyses, and are based upon the net benefits of individual boat launch locations and other non-environmental considerations. “Neither CEQA nor the CEQA Guidelines require that an EIR include studies comparing the project’s environmental costs with its benefits...the only direct comparison required in an EIR is the comparison of the project alternatives..., and a cost benefit analysis is not required in making that comparison.” (Kostka & Zischke, Practice Under the California Environmental Quality Act, (2d ed Cal CEB, 2016), p. 643-644, § 13.34.) Under “Small Craft Traffic,” the commenter also states that the Draft EIR fails to address that the water to the immediate east of the breakwater, near Mole A, silts in, making it un-navigable and a hazard to boaters without local knowledge. Should Mole A or any of the other alternative ramp locations be chosen, coastal engineering would be performed that would locate and design a ramp that considers site-specific concerns.

The commenter appears to place more weight upon providing “enhanced fish utilization” instead of providing habitat for soft bottom marine communities. As noted in Draft EIR Section 4.6, there are different tradeoffs for each alternative and resource area (e.g., while some alternatives would reduce impacts compared to the proposed project, some of the project benefits would not be implemented).” As also discussed the Council for Environmental Quality’s Forty Questions, “The Council recognizes that the identification of the environmentally preferable alternative may involve difficult judgments, particularly when one environmental value must be balanced against another.” As noted in the DEIR, individuals will weigh different environmental factors in different ways, this does not make the Draft EIR inadequate. Under “Biological,” the commenter is correct that there are some benefits to hard bottom habitat over the soft bottom. However, this is not the only factor that was considered in the comparing the potential biological impacts of the Alternative 8 boat ramp options to the proposed project. Under the proposed project, as discussed under Impact BIO-3 beginning on page 3.3-54 in Section 3.3 Biological Resources of the Draft EIR, the breakwater would result in fill of federally protected waters of the U.S. This is considered a significant impact (although, as described under Impact BIO-3, this impact may be offset by the opening of Seaside Lagoon if Seaside Lagoon is not considered historically jurisdictional). Conversely, under each of the Alternative 8 boat ramp options, no fill of federally protected waters of the U.S. would occur, and thus, a significant impact that would occur under the proposed project would be avoided. Therefore, the Alternative boat ramp options are correctly ranked as having a lesser environmental impact than the proposed project in comparison to existing conditions. Additionally, without construction of the breakwater, there would be less direct disturbance of existing habitats and organisms and there would also be less potential for indirect effects, such as turbidity, to occur in the immediate vicinity of construction. While these construction impacts would be less than significant under both the proposed project and the Alternative 8 boat ramp options, the impact under the Alternative 8 boat ramp options would be slightly reduced as compared to the proposed project. Please also see Response to Comment PC406-1.

Under “Air Quality and Greenhouse Gases,” and “Impact on Coastal Dependent Yacht Club” the commenter states that, “Additionally, since the original publication of the DEIR, a review of the required parking has revealed that the boat ramp and the yacht club will not both fit on Mole A, so the clubhouse, which is equivalent in size to Joe’s Crab Shack would also need to be demolished.’ Parking at each of the proposed boat ramp alternative locations were shown on each site (Figures 4-5a through 4-5f of the Draft EIR). The siting of the Mole A one and two-lane boat ramps considered the existing yacht club building and use. Depending on a one or two lane boat ramp, parking some minor access would need to be reconfigured. Please see Response to

Comment PC349-1 for discussion of different options at Mole A.

Under “Recreational Demand,” as for previous studies on trailered boat launches in King Harbor, Noble Consultants’ King Harbor Small Craft Traffic Assessment (Appendix L2 of the Draft EIR) provides an up to date assessment of small craft boating traffic in King Harbor. Please also see Master Response #8: Boat Ramp in King Harbor for discussion of demand of other boat launch facilities in the region.

Under ‘Public Outreach,’ although the public outreach associated with the recent Noble Consultant feasibility effort has occurred post-feasibility study as well as post-Draft EIR, enough information was available from the current feasibility effort and previous boat ramp public meetings to perform the alternatives analysis.

As for the commenter’s issues with the alternative rank and score, as shown in Table 4-63, and described in the accompanying notes and text, the alternatives are ranked relative to the environmental impacts that may occur in comparison to the proposed project. The criteria used are the thresholds analyzed for both the proposed project in Sections 3.1 through 3.14 and the alternatives in Chapter 4.

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. PC426**ADELE GLEICHMAN**

Comment PC426-1

Please see the attached document.

Comments on the Waterfront Draft Environmental Impact Report

As a long time resident of Redondo Beach I do not approve of the Center Cal plans for our waterfront because it has too many flaws. It is not at all in keeping with the ocean and beach atmosphere of our town. It is too tall and will block our current harbor and marina views that we currently enjoy along Harbor Drive. Residents and visitors alike come to our harbor for the pleasant atmosphere that would be destroyed by the much, much too large development proposed by Center Cal.

The Center Cal project neither accurately nor appropriately plans for the estimated 12,500 additional car trips per day to our waterfront. The current plan includes three left turn lanes for westbound cars at the 190th/ Anita and Pacific Coast Highway intersection. Currently there are two left turn lanes at that intersection for drivers who are turning left many of whom are very confused about which lane they need to be in for getting onto either Catalina or onto PCH. Adding a third left turn lane would be even more confusing to drivers creating a very dangerous intersection. Also, close to that is where northbound Catalina ends at PCH. Currently at busy traffic times of day the lanes that are turning left from Catalina onto northbound PCH have an almost gridlock situation. The Center Cal project plans to add even more cars turning north which would most certainly create gridlock. For the cars that will arrive to the project site when it is completed there will be an insufficient number of parking spaces. The project needs to be downsized in order to avoid these potential problems.

The Center Cal project plans do not provide sufficiently for the recreational needs of waterfront users. The plan to open Seaside Lagoon to the harbor has serious flaws. Most importantly, it would no longer be a healthy place for children to swim. The area around the Redondo Beach Pier typically has very poor water quality due to the high bacterial count when the ocean water there is evaluated. Both children and adults would have a much healthier and pleasant place to swim if an in ground aquatic center would be built. If Seaside Lagoon is to be opened to the harbor it would no longer be an enclosed safe place for children. It needs to remain fenced in order to remain safe. The Center Cal plan reduces in size the recreational area of Seaside Lagoon but adds to it

the additional waterfront activities that would not be compatible with keeping it a children's place to play.

The Center Cal plan indicates walkways as recreational areas. We need more real recreational areas in our harbor, not fewer. A flower bed and a sidewalk do not make for real recreational space. Also, their written description mentions a children's play area; but there is none in the actual drawings of the plans.

Response to Comment PC426-1

The commenter's opinions are noted. Views are detailed in Section 3.1, Aesthetics and Visual Resources of the Draft EIR and Master Response #9: Views and Scale of Development. Several alternatives were studied in the Draft EIR (in Chapter 4), including a reduced density alternative (Alternative 7) As shown on Figure 3.13-10 of the Draft EIR, the project is not proposing to add an additional westbound left-turn lane at Intersection #7 PCH/Catalina Avenue & Herondo/Anita Street as a mitigation measure. Please refer to Section 3.13, Traffic and Transportation of the Draft EIR and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project regarding intersection impacts and mitigation. Please see Section 3.13 of the Draft EIR and Master Response #7: Waterfront Parking regarding parking. Regarding Seaside Lagoon, please see Section 3.8, Hydrology and Water Quality and Section 3.12, Recreation of the Draft EIR and Master Response #4: Modifications to the Seaside Lagoon. The final configuration of the project (including location of a children's play area) will be part of final design. 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 project is not final until approved by the City's decision-making body.

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. PC427

GERRY O'CONNOR

Comment PC427-1

Please accept this letter as a response to The Waterfront Draft Environmental Impact Report, submitted during the public review period ending on January 19, 2016 at 5:30PM (PST).

Questions and input are provided in the following categories:

Recreational Harbor Use/Access

Views, Sunlight, Esthetics

Traffic Volume Determination; Arterial, Community and Regional Impacts

Parking Replacement of Pier Parking Structure; Omission of New Structure in Total Square Footage

Seaside Lagoon Impacts of Size Reduction/Opening to Harbor on Recreation, Water Quality, Sea Life

General Process Questions Omission of AES Parcel Development; EIR Scoping Meeting Public Input Actively Discouraged; Conflicts of Interest

Response to Comment PC427-1

The comment includes a list of items detailed below. Please refer to Responses to Comments PC427-2 to PC427-9 below.

Comment PC427-2

Recreational Harbor Use/Access

With the decrease in parking for vehicles with trailers from 67 to 20 spaces, there will be greatly decreased access for boaters, kayakers, stand up paddleboarders, etc. Hauling gear from the parking garage to the water is unworkable. Seaside Lagoon will be reduced to 1/3 its current size.

Question: How then does the DEIR conclude 'No Impact' on Recreation?

Response to Comment PC427-2

Please refer to Master Response #7: Waterfront Parking regarding parking on the site, including SUP parking. Regarding the size of the Seaside Lagoon, please refer to Master Response #4: Modifications to the Seaside Lagoon.

As detailed in Section 3.12, Recreation of the Draft (as well as the Executive Summary), two thresholds of significance were used in the recreation analysis: REC-1 and REC-2. The analysis in the Draft EIR concluded that a less than significant impact would occur for REC-1 as the proposed project would not 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. The analysis concluded no impact for REC-2 that 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. Please also see Response to Comment PC323-82.

Comment PC427-3

Views / Sunlight / Esthetics

With the addition of a 3 story, 4 level, 261,000 square foot, *560 FOOT LONG* parking structure, immediately followed by a *240 FOOT LONG* movie theater ... plus a 523,000 square foot shopping mall behind that, approximately 80% of the views of Palos Verdes and the ocean will be eliminated from Harbor Drive. The sunny bicycle path will be converted into a darkened concrete canyon.

Question: How then does the DEIR conclude 'Less Than Significant Impact' on 'Aesthetic and Visual Resources'?

Response to Comment PC427-3

As shown in the Draft EIR, the proposed specialty cinema is located on the west side of the proposed northern parking structure, and not along Harbor Drive. Please refer to Response to Comment PC323-43. In addition, please refer to Section 3.1, Aesthetics and Visual Resources, and Master Response #9: Views and Scale of Development regarding methodology, views along Harbor Drive, and building massing.

Comment PC427-4Traffic

The addition of 12,550 additional car trips per day (which seems underestimated, given the sales levels required for financial success) will further snarl traffic locally, at nearby intersections already rated at 'F' level of service, and regionally. South Redondo residents will become sequestered.

Question: How then does the DEIR conclude 'Less Than Significant Impact After Mitigation' on 'Traffic and Transportation'?

Response to Comment PC427-4

As detailed traffic study (Appendix L1 of the Draft EIR) was performed for the proposed project. For information on the traffic analysis, results/impacts, and mitigation, please refer to Section 3.13, Traffic and Transportation and Master Response #6: Summary of Traffic Impacts Associated with the Operation of the Proposed Project.

Comment PC427-5Parking

The pier parking structure is removed and replaced, and a new 3 story, 4 level, 261,000 square foot, 560 foot long parking structure is planned at Harbor Drive and Portofino Way.

Question: Why is the pier parking structure being removed and replaced, rather than repaired - especially in light of the city report presented to Council today (1/19/16) defining the feasible option to repair it?

Question: Why is the square footage of parking structures omitted from the total new development square footage?

Question: Why does ~140% more development only require ~8% more parking?

Response to Comment PC427-5

As addressed in the Draft EIR (such as on page 2-9 of Chapter 2, Project Description), the Pier Parking likely has only five to ten years of service life remaining. At the end of 2015, the City has tasked the Walker Restoration Consultants to do an additional conditions assessment of both the Plaza and Pier Parking Structures, and a few months ago began the necessary repairs to maintain the structure until a permanent solution can be found. The Draft EIR evaluated an 'infrastructure only' alternative to the proposed project (Alternative 2 - No Project – Necessary Infrastructure Improvements). As detailed in 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. Alternative 2 would be a City project that would be solely funded by City funds. Please see Response to Comment PC323-2 for additional discussion of the Walker Report (which appears to be the report referenced by the commenter).

Regarding the square footage of parking structures being omitted in new development square footage, please refer to Response to Comment PC323-55. Please see Master Response #7: Waterfront Parking regarding parking on the site.

Comment PC427-6

Seaside Lagoon

Seaside Lagoon is reduced to 1/3 its current size and opened to the ocean. Recent measurements have exceeded health standards for E-coli and fecal matter.

Question: What will prevent sea life (sea lions, seals, etc.) from inhabiting Seaside Lagoon and its beaches once it is opened to the ocean?

Question: Why won't water quality decline even further from already unacceptable and often illegal levels?

Question: Why won't usage decline considerably, due to significantly smaller size (and presumably decreased water quality)?

Question: How then does the DEIR conclude 'No Impact' on Recreation?

Response to Comment PC427-6

Details on the Draft EIR's conclusion of less than significant impacts on water quality and pinnipeds related to the Seaside Lagoon can be found in Section 3.8 and Section 3.3, respectively. In addition, please refer to Master Response #4: Modifications to the Seaside Lagoon. Refer to Response to Comment PC427-2 above regarding recreation impact determinations.

Comment PC427-7

General Process Questions

Question: Why does the DEIR not consider the potential development of the abutting 50 acre AES parcel?

Response to Comment PC427-7

The proposed project would not modify AES' property. As for the future AES project, refer to Master Response #1: AES Power Plant Site.

Comment PC427-8

Question: Why did the referenced EIR Scoping Meeting of July 9, 2014 so actively discourage public participation by: 1) being held 3 weeks into the public review period that was less than 5 weeks long; 2) being held in the lobby of the Redondo Performing Arts Center with no seating, when the adjoining auditorium with seating was fully available; 3) offering presentations that could not be seen by most of the standing audience, offered by inexperienced presenters obviously unfamiliar with both the presentation materials and the proposed project; and 4) prohibiting oral comments and/or discussion by the public?

(It must be noted that of the referenced ~260 written comments received during this June 19 to July 21, 2014 review period, I counted well over 90% to be in clear opposition to the project as proposed - yet the DEIR states that since those comments were received "...the project elements and overall site design concept of the proposed

project have not materially changed.")

Response to Comment PC427-8

The preparation of the Draft EIR, as well as the public participation portion of the process associated with the Draft EIR, was 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 well as the applicable provisions of the Redondo Beach Municipal Code. Please refer to Section 2.1 of Chapter 2 of this Final EIR for details on the extended public outreach associated with the Draft EIR approved by the Mayor and City Council on November 3, 2015 for this project. 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 PC427-9

Question: How does it not reflect a significant conflict of interest for the employee of CDM Smith (the DEIR author under contract to the City of Redondo Beach) who is listed in the DEIR as the staff Planner for the DEIR, to also be hired, under contract, by the City of Redondo Beach to be the Lead Planner for the project in the City's Community Development Department?

Thank you for the opportunity to comment on The Waterfront Draft EIR, and I look forward to these questions, and many more, being adequately and fully addressed as an integral and very important part of the Final EIR.

Response to Comment PC427-9

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 states an opinion and does not introduce new environmental information.

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. PC428

BETH METZGER

Comment PC428-1

I support the Waterfront project and the partnership the City of Redondo Beach is interested in entering into with CenterCal. We believe this new waterfront will not only allow, but encourage current Redondo Beach resident to frequent their own waterfront instead of visiting neighboring cities as an entertainment destination.

The public recreation enhancements are important to our community, and the plan to replace the parking structure is long over due. The boat launch ramp, which is a requirement, needs to be thoroughly thought out and placed in an area that best suits its purpose while disrupting the surrounding area the least. Allowing the seaside lagoon to be utilized year round by both swimmers and water sport enthusiasts will have a

positive impact on the community. We are in favor of an access road between International Boardwalk and Basin 3 for easy access by emergency vehicles offering an added safety measure for our community.

Response to Comment PC428-1

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. PC429

RUSSELL BURRUSS

Comment PC429-1

Please keep Redondo beach Sport fishing in Redondo Beach> It would be a huge negative to rid Redondo of its sport fishing heritage It has been around longer than any of the business' AS the (new business come and go thru the revolving door) Redondo sport fishing remains. leave this one alone !!!!! Its good for the kids .If you want to pick on something ,take a hard look at Kincades never seen a more run down looking restaurant !!! Do something about that !!!!!.

Response to Comment PC429-1

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. PC430

PAUL SCHLICHTING

Comment PC430-1

Dear Mayor, City Council, City Clerk, Staff, and Residents,

I am providing my input to this specified EIR and associated project as follows:

- 1) Considering the project of this size, scope, and cost, there has been insufficient notice and process available to the public by way of:
 - a. Inadequate notice and communications to the general public. Where the prior "Heart of the City" had banners around the city, nothing anywhere comparing to that reach-out effort was performed for this project.
 - b. Mailings to the residents have been woefully inadequate, if not non-existent. I asked my wife, and we don't recalling receiving anything about this project, save maybe a single notice months ago – but with no follow-up about the availability of the Draft EIR and the deadline for public input.
 - c. Because of the above, the public has been cut out of the input and deliberation process. This is contrary to the responsibility the City Staff and elected officials owe to their employers and constituents., respectively.

This process for disseminating information to the public, and allowing the public its rightful ability to provide feedback and input on this project, needs to be extended for at least a number of months – until sufficient public notifications, workshops, and input, are provided in a manner that truly provides for not only public participation in this, but actual public "ownership" of such a plan/project. Any efforts to argue and effect otherwise would clearly demonstrate the desire to minimize both public notification and input, and try to hasten a "solution" that may be perceived as one that the public may very well find contrary to its interest.